

## **CALIFORNIA COASTAL COMMISSION**

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# **F14a**

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

**March 12, 2021**

**CORRESPONDENCE**



March 10, 2021

**Memo**

**To:** Erik Martinez, California Coastal Commission [erik.martinez@coastal.ca.gov]

**From:** Craig Stevens

**Cc:** Steve Monowitz; Mike Schaller, San Mateo County Planning and Building Department; Law Offices of Brian Gaffney

**Re:** Responses to Comments in February 8, 2021 Letter from Law Offices of Brian Gaffney on Behalf of Resist Density and MidCoast ECO

## Introduction

MidPen Housing Corporation has submitted applications to San Mateo County for County entitlements, and San Mateo County has submitted applications to the Coastal Commission for the pending Local Coastal Plan Amendment and Implemental Program amendments. In support of these applications, environmental review has been conducted to support the application. (See Preliminary Environmental Evaluation; Supplemental Environmental Evaluation Report; and supporting technical studies<sup>1</sup>). The following responds to points raised in the February 8, 2021 letter submitted by Brian Gaffney on behalf of Resist Density and MidCoast ECO regarding these environmental documents. Comments are presented in the same order as in the letter from Gaffney, and numbering from the letter has been incorporated, where available. The comments are summarized in *italics*, followed by the responses.

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

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<sup>1</sup> See San Mateo County, Cypress Point Affordable Housing Community Project webpage, available here: <https://planning.smcgov.org/cypress-point-affordable-housing-community-project>.



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

MidPen prepared and the County reviewed the report *Cypress Point Project-Policy Consistency Analysis* that evaluates in detail the consistency of the proposed project with the San Mateo County Local Coastal Program, the San Mateo County Zoning Ordinance, the California Coastal Act, and the Montara-Moss Beach-El Granada Community Plan (see footnote 1).

***(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);***

Please see response to item (1) above.

***(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);***

The Coastal Commission’s filing letter dated September 29, 2020 stated: “Thank you for providing the summary of public participation which includes the list of hearing dates, copies of the public comments received and staff responses to public comments submitted.” This indicates that public comments were submitted to the Coastal Commission.

## **I. Law**

No responses required.

## **II. 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 project will result in numerous significant and unavoidable traffic impacts.***

The traffic study prepared for the proposed project (Kittelston & Associates 2020, see Footnote 1) includes a detailed evaluation of the project's anticipated traffic impacts on various intersections, related to both operations and safety considerations. The traffic study concludes that mitigation would be required to reduce impacts at a number of intersections to a less-than-significant level, and discusses mitigation options for each such impact.

However, San Mateo County is in the process of completing the Connect the Coastside, a community-based transportation plan to help improve mobility and safety for Coastside residents and visitors. A final Administrative draft of this plan was issued by the County on January 20, 2021. When the plan is finished, the County will identify the required transportation improvements for the specific intersections evaluated in the project traffic study, including improvements to intersections and transit services and facilities. During the process of approving the Coastal Development Plan (CDP) for the proposed project, it is expected that MidPen Housing may negotiate a fair share agreement to fund portions of relevant improvements. Such an agreement will need to be completed before the County approval of the CDP.

***There has been no analysis yet of vehicle miles traveled.***

An August 14, 2020 memo from Mike Alston of Kittelson & Associates to Mike Schaller at San Mateo County Planning & Building Department addresses the issue of evaluating vehicle miles traveled (VMT) per new requirements incorporated into CEQA pursuant to Senate Bill 743. The memo states:

San Mateo County is currently revising its transportation analysis guidelines, which when updated will include screening thresholds for applying VMT in transportation analysis.

For the time being it is also noted that the Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in*

CEQA (December 2018) includes a less than significant VMT presumption for affordable housing projects (p. 14-15)<sup>2</sup>.

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

The transportation analysis completed by Kittelson & Associates, Inc. proposed mitigation measures for all identified significant traffic and transportation impacts. The mitigation measures would reduce impacts to a less-than-significant level, if implemented. However, some mitigation measures cannot be implemented directly by San Mateo County because they do not have direct authority over certain facilities like Highway 1. In locations where the County does not have direct authority to implement the proposed mitigation measures and would have to work with another agency, the transportation analysis has concluded that the impacts would be significant and unavoidable. This is standard CEQA practice when implementation of the mitigation measure cannot be assured by the County due to lack of jurisdiction over the facility.

As noted above, MidPen is expected to work with San Mateo County to negotiate fair share contributions to intersection and other transportation improvements within Moss Beach identified in the final Connect the Coastside report. MidPen will prepare a detailed analysis of the operation of each intersection with the recommended improvements during the CDP process.

***MidPen's use of a ratio approach to justify traffic impacts...violates well established CEQA law.***

MidPen's traffic study does not use a ratio approach to identify transportation impacts. Transportation impacts and mitigations are identified using typical transportation engineering procedures used in traffic analyses in CEQA documents. The ratio discussion is used not to evaluate the significance of the impact, but to identify the project's contribution to the overall traffic at locations where significant impacts were identified. The ratios were also used to assist in the identification of the project's fair share contribution to transportation improvements.

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<sup>2</sup> Available at [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).

***There has not been adequate consideration of cumulative traffic impacts.***

The Kittelson report (see Footnote 1) contains a detailed analysis of the impacts of the proposed project under cumulative conditions, beginning on Page 37.

## **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.***

The public access provisions of both the Coastal Act and the San Mateo County Local Coastal Plan refer to maintaining or enhancing opportunities for members of the public to access coastal resources, such as beaches. The proposed project is located inland of SR 1, and nothing about the proposed project would inhibit or prevent any member of the public from accessing the coast. To the contrary, MidPen proposes sidewalks and pathways to improve pedestrian access in the neighborhood of the proposed project.

## **C. Community Character**

***Pursuant to LCP 3.13, new development providing 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...the reasonably foreseeable development may include building heights which are out-of-character with the surrounding community...and Moss Beach.***

MidPen has been working with the County and neighbors of the project to refine the project design to ensure that it is compatible with the surrounding neighborhood, including:

- Increasing setbacks from Carlos Street,
- Modifying the method for calculating building heights to reduce building heights, and
- Proposing a density for the site to that is similar to the surrounding neighborhood.

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

***Discharge of storm water to Montara Creek and the Fitzgerald ASBS would violate Coastal Act provisions providing “special protection” to areas and species of special biological significance.***

The Supplemental Environmental Evaluation Report (see Footnote 1) evaluates the potential for the proposed project to result in hydrologic or water quality impacts to Montara Creek and the Fitzgerald Area of Special Biological Significance (ASBS). The report notes that the proposed project will be required to obtain coverage under the SWRCB’s General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ, and to be consistent with the County’s Municipal Regional Permit for stormwater and the County’s Fitzgerald ASBS Pollution Reduction Program for stormwater discharge during and post-construction. For these reasons, the Supplemental Environmental Evaluation Report concludes that the proposed project would not result in significant impacts on Montara Creek or the Fitzgerald ASBS. This comment does not provide any evidence that would change this conclusion.

***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.***

As noted above, the proposed project will need to demonstrate coverage under San Mateo County water quality permits, both for project construction and project operations. San Mateo County’s Municipal Regional Permit for stormwater requires development to ensure that the duration and flow of runoff from the site remains at pre-project levels. BKF Engineers, MidPen’s consultants prepared a Hydromodification Report (see Footnote 1) which contains preliminary calculations for the size of on-site detention ponds to both control site runoff and capture sediment in runoff. These calculations will be revised, as needed, during the CDP process, when more details about project design are available, and when MidPen applies for coverage under the Municipal Regional Permit.

In addition, the proposed project includes HydroModification features to ensure that post-project stormwater runoff does not exceed pre-project levels.

***The proposed project may have adverse impacts on a known ESHA in the project vicinity and impact sensitive habitat.***

The Biological Resources Assessment prepared by MidPen's consultants De Novo Planning Group and WRA Environmental Consultants evaluated the project site and found no evidence of an ESHA on the project site based on records searches and multiple field surveys. This comment does not provide evidence that would contradict this conclusion.

Also note that the Coastal Commission staff report states "to date ESHA has not been identified on the property to which LUP amendments apply, and the closest known ESHA is Montara Creek, a perennial stream, which is located approximately 250 feet to the northeast of the site running parallel to the site's northern border." (p. 12) The Coastal Commission staff report further notes that "all LCP habitat protections would continue to apply to future development proposed at the site through the CDP process to appropriately address any ESHA and/or habitat issues, including through avoidance, required buffers, and construction best management practices." (p. 12)

***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. There is expert comment that "there is a potentially significant adverse wastewater impact that should be evaluated further before project approval."***

As stated in the Coastal Commission staff report LCP policies "prioritize affordable housing in a manner that will not have adverse impacts...(LUP Policy 1.18(c)). These policies ensure that affordable housing is served with adequate water supplies and wastewater treatment facilities (LUP Policies 1.19, 2.8 and 3.12)."

The *Cypress Point Project - Public Services and Utilities* report (see Footnote 1), prepared by MidPen consultant Stevens Consulting, evaluates the potential impacts of the project on a variety of public services, including wastewater services, and concludes that the proposed project would not result in a significant impact.

BKF and MidPen have, and will continue to, closely coordinate with the Montara Water and Sanitary District during the project's design process to ensure that the district's water and sewer needs and standard requirements are met. During the CDP review process, the County will review and approve all such improvements. There is no evidence to suggest that implementation of the proposed project will result in sewage spills.

***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.***

As noted above, a preliminary analysis of drainage was completed for the *Hydromodification Report* (see Footnote 1). In addition, the proposed project includes HydroModification features to ensure that post-project stormwater runoff does not exceed pre-project levels.

A more detailed analysis of on-site and off-site drainage will occur during the CDP process, at which time, any potential impacts of changes in drainage to biological resources will be evaluated.

## **E. Minimizing Risks in Areas of High Fire Hazard**

***The Proposed Project, by adding a minimum of 142 new vehicles...to this tightly constrained area of Moss Beach decreases traffic circulation in the event of an emergency.***

The Preliminary Environmental Evaluation Report (see Footnote 1) evaluates the potential for the proposed project to lead to increases in risk related to wildland fires. This comment does not provide any evidence that the proposed project would substantially contribute to an impact related to emergency access.

***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.***

The Coastal Commission staff report notes that the "water and sewer services providers for the subject site (Montara Water and Sanitary District and Sewer Authority Mid-Coastside) have indicated that there is enough water and sewer capacity to service an affordable housing project at the proposed density, because they have already reserved

capacity for such uses at the higher density associated with existing LCP requirements.” (p. 9)

Further analysis of water availability for fire fighting will be completed during the CDP phase of project approval.

## **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...In contrast, the reasonably foreseeable development as a result of the proposed amendment proposes to build all 71 units at once.***

Policy 3.16 in the Local Coastal Plan states:

### Phasing the Development of Designated Housing Sites

- a. Limit the number of affordable housing units given building permits for construction on the designated sites to 60 during any 12-month period in order to allow the affordable housing units constructed on the designated housing sites to be assimilated into the community a few at a time.
- b. Allow the County Board of Supervisors to increase the number of affordable housing units permitted if they make the finding that the above phasing requirement threatens the implementation of affordable housing on a designated site by prohibiting the developer(s) from building when circumstances are uniquely favorable for a limited period of time (i.e., low interest rate financing or public subsidies are available).

MidPen has requested that the County concur with their conclusion that this limitation would “threaten the implementation of affordable housing”. The significant challenges of financing and constructing affordable housing, which include continued escalation of construction costs in the Bay Area, increases in interest rates over time, a shifting financial environment, and limited income from rental units, means that requiring the project to be approved and built over two years would significantly increase costs and jeopardize feasibility. Also, tight project deadlines and high competition for tax credit financing would not allow the project to be developed in two phases.



While Policy 1.23 in the Local Coastal Plan does include a provision limiting the number of units to be built in any 12-month period in the Midcoast to 40 until certain infrastructure improvements have been completed, it also contains the following provision in Section 1.23(d):

“If the number of issued building permits for any given year has reached the 40-unit maximum, building permits for affordable housing, including second dwelling units, may still be issued under the following circumstances: (1) the units are “affordable” as defined by Section 6102.48.6 of the certified zoning regulations and subject to income and cost/rent restrictions for the life of the development; and (2) the growth rate average over the three-year period, that includes the year of building permit issuance and the following two years, does not exceed 40 units/year.” Section 6102.48.6 defines affordable housing as “Housing with a contract rent or price which is affordable by low and moderate income households.”

The proposed project, an 100% low income affordable housing project, meets the requirements provided in Policy 1.23, Section (d), and should thus be exempted from the requirements contained in Policy 1.23. The project would provide affordable housing and it is likely that the growth rate over a three-year period would not exceed either 40 or 60 units per year. That being said, the referenced policy relates to the eventual project buildout and phasing and not the currently pending LCP and IP amendments.

***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.***

The *Cypress Point Project - Public Services and Utilities* report, prepared by Stevens Consulting on behalf of MidPen (see Footnote 1), evaluates the potential impacts of the project on a variety of public services, including wastewater services, and concludes that the proposed project would not create a significant impact. Further, the Cumulative Impacts Analysis report prepared by Stevens Consulting (see Footnote 1) evaluates the potential impacts of the proposed project on wastewater services, and concludes that the proposed project would not make a significant contribution to a cumulative impact. Finally, MidPen will need

to demonstrate compliance with various environmental permits intended to protect water quality when it applies for a CDP (as described above under II.D). This comment does not provide evidence that would contradict these conclusions.

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

*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 the reasonably foreseeable development will result in traffic, public access, emergency evacuation, hazardous material, and discharge impacts. Thus, the project violates the Coastal Act*

The proposed project is located in a developed portion of Moss Beach, with housing units adjacent to the parcel on the east and south sides. This comment does not provide any evidence that would contradict the conclusions of the Supplemental Environmental Evaluation Report regarding the environmental impacts of the proposed project, nor is there any evidence that it would violate the California Coastal Act.

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

During this first stage of project approval, San Mateo County, on behalf of MidPen is acting as the applicant to the California Coastal Commission (Commission) in requesting an amendment to the San Mateo County Local Coastal Program (LCP) to accommodate the land uses requested in the proposed project application. The requested approvals include:

- Amending the LCP Implementation Plan and existing Planned Unit Development (PUD) for the site to reduce the number of units from 148 to 71;
- Amending the LCP Land Use Plan to change the site's zoning designation from Medium-High Density Residential to Medium Density Residential; and
- Amending section 3.15(d) of the LCP to allow for 100% of units, apart from a resident manager's unit, to serve low-households.

Thus, the County appropriately described the proposed changes as a reduction in allowable density on the project parcel. Further, a leading CEQA practice guide explains that when reviewing changes to a project that was previously reviewed under CEQA, it is appropriate to limit the review to impacts from the revised project. It provides (Kostka and Ziske, *Practice Under the California Environmental Quality Act*, §12.23):

When an agency is reviewing a proposed change to a project that has previously been reviewed under CEQA, the agency must apply CEQA's standards limiting the scope of subsequent environmental review. 14 Cal Code Regs §15162; *Abatti v Imperial Irrig. Dist.* (2012) 205 CA4th 650; *Sierra Club v City of Orange* (2008) 163 CA4th 523, 542; *Temecula Band of Luiseño Mission Indians v Rancho Cal. Water Dist.* (1996) 43 CA4th 425, 437; *Benton v Board of Supervisors* (1991) 226 CA3d 1467, 1477. Under these standards, once an EIR has been certified or a negative declaration adopted for a project, further CEQA review is limited. *Communities for a Better Env't v South Coast Air Quality Mgmt. Dist.* (2010) 48 C4th 310. These standards apply whether or not the project has been constructed. *Benton v Board of Supervisors*, supra. In effect, "the baseline for purposes of CEQA is adjusted such that the originally approved project is assumed to exist." Remy, Thomas, Moose & Manley, *Guide to CEQA* 207 (11th ed 2007). See chap 19.

It follows that the same applies to a project previously reviewed under a certified regulatory program. Similarly, because PUD-124 was previously approved pursuant to the Coastal Commission's certified regulatory program, it is appropriate to review the proposed PUD-140 as compared to previously reviewed and approved PUD-124. It is then relevant that

the proposed PUD-140 *reduces* density and environmental impacts as compared to PUD-124.

That said, the Supplemental Environmental Evaluation Report appropriately used “existing conditions” or the current conditions within and near to the parcel as the baseline for the analysis of the project’s impacts, anticipating that Supplemental Environmental Evaluation Report may, in part, serve as CEQA compliance for the next phase of work, approval of the CDP. Thus, for the purposes of CEQA, the impacts of the project were evaluated against existing conditions.

***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 Biological Resources Assessment (see Footnote 1) contains a detailed description of species and habitats present on the project site (starting on Page 5), and a detailed assessment of impacts on the California red-legged frog (starting on Page 36). This assessment concludes:

It is noted, that the project site does not provide the appropriate aquatic habitat necessary for this species, it was not observed on the project site, and there are no records of this species on the project site. Nevertheless, the potential for impacts exists, so this impact is considered significant. With implementation of Mitigation Measures Bio-2 and Bio-3, the proposed project would avoid, minimize, and mitigate the impact on CRLF by ensuring that appropriate protection measures are implemented during project construction.

***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.***

The analysis in the Biological Resources Assessment (see Footnote 1) was based on a *current* review of publicly available databases and multiple detailed surveys of the project site to characterize *current* site conditions.

Recent surveys failed to find the prairie grassland identified in that earlier survey.

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

*The proposed project – by adding a minimum of 142 new vehicles...to this tightly constrained area of Moss Beach – decreases traffic circulation in the event of an emergency.*

See response to comment II.E above.

*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.”*

The potential impacts of the proposed project related to wildfire risk are evaluated in *Section 5. Hazards and Hazardous Materials* in the Supplemental Environmental Evaluation Report (see Footnote 1). This analysis concludes that the proposed project would not have a significant impact related to wildland fires. An additional analysis of risks related to wildland fire may also be conducted during the CDP phase of project approval.

**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 stormwater runoff and project hydromodification, as well as the biological impacts of foreseeable discharges.*

Please see the response to Comments II.D above.

**D. The County’s Analysis of Traffic Impacts is Flawed**

*The analysis failed to evaluate the impacts of truck traffic during the construction phase of the proposed project or the air quality impacts of these trips.*

San Mateo County guidance for the preparation of traffic impact studies does not require the analysis of construction traffic impacts, because those impacts are temporary. Construction impacts are typically addressed through the preparation and implementation of a Traffic Management Plan. A Traffic Management Plan addresses the management of construction traffic-related impacts, including potential road closures and detours, and the maintenance of access for emergency vehicles. Such a plan will be prepared during the CDP phase of project approval.

Further, with respect to air quality impacts, the BAAQMD CEQA Air Quality Guidelines consider these construction impacts to be less than significant if best management practices are implemented to reduce these emissions. As noted in the *Air Quality & Greenhouse Gas Emissions Assessment* prepared by MidPen consultants Illingworth & Rodkin (see Footnote 1), with implementation of Mitigation Measure AQ-1, which would implement BAAQMD-recommended best management practices, this impact would be less than significant. Further, the *Air Quality and Greenhouse Gas Emissions Assessment*, evaluated the exposure of nearby existing residences to project construction-related toxic air contaminants (see Impact 4b). With implementation of Mitigation Measure, AQ-2 (requiring use of low diesel particulate construction equipment) this impact would be less than significant.

***MidPen's Cypress Point Traffic Impact Analysis failed to address issues raised by the California Department of Transportation's 2018 letter regarding this proposed project.***

MidPen received two comment letters from Caltrans on the Kittelson & Associates traffic study, one in April 2018 and one in August 2018. These comments were reviewed in detail, and MidPen consultants Kittelson & Associates met with Caltrans to discuss them. In 2019 Kittelson & Associates revised the traffic study and incorporated the feedback received from Caltrans. During the next phase of project approval (application for a Coastal Development Permit) further revisions to the study may be undertaken to reflect further discussions with Caltrans.

**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.***

The potential impacts of the proposed project related to hazardous materials are evaluated in *Section 5. Hazards and Hazardous Materials* in the Supplemental Environmental Evaluation Report (see Footnote 1).

The report states:

The transport and use of hazardous materials during construction of the proposed project would be a significant impact. To reduce this impact to a less than significant level, implement Mitigation Measure HAZ-1.

***The Phase I Environmental Site Assessment and the Phase II Subsurface Investigation were not presented to the Coastal Commission.***

All of the reports comprising the environmental analysis, including the Phase I and Phase II reports (see Footnote 1) were provided to the Coastal Commission by San Mateo County.

***MidPen's environmental evaluation doesn't opine on whether the soil contamination constitutes a significant impact or not...***

As noted above, the Supplemental Environmental Evaluation Report (see Footnote 1), found that the transport and use of hazardous materials during construction (which includes the movement of any contaminated soils) was a significant impact. The Site Management Plan to be prepared under Mitigation Measure HAZ-1 during the CDP phase of project approval, will include the results of more detailed soil analysis and will include specific requirements regarding the handling of potentially contaminated soils present on the project site during construction, as well as methods for ensuring that residents are protected from any contaminated soils.

***...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.***

Detailed testing of site soils for contaminants will be done as part of the next phase of project approvals, review of the CDP.

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

***...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.***

The County has not impermissibly deferred discussion of traffic, safety, and circulation mitigation measures. Although the improvements to be required at various intersections cannot be known until the County completes the Connect the Coastside study, the traffic study includes a description of the type of improvements that the County is considering. Decisions regarding the transportation improvements to be made and the project's fair share contribution requirements will be made as part of the CDP process.

#### **G. The County Did Not Evaluate Cumulative Impacts**

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

MidPen's hired consultants prepared and the County reviewed a stand-alone report entitled *Cypress Point Project-Cumulative Impact Analysis* (see Footnote 1) which includes a thorough analysis of the contribution of the proposed project to cumulative impacts related to all Appendix G resource topics. The analysis includes a list of all past, present, and reasonably foreseeable projects in the MidCoast portion of San Mateo County that could contribute to the identified environmental impacts of the proposed project.



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RESOURCES AND TRANSPORTATION  
SELECT COMMITTEES  
CHAIR: BIOTECHNOLOGY  
CALIFORNIA WORKFORCE  
DEVELOPMENT BOARD

March 4, 2021

California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

Dear Commissioners,

I write in strong support of the MidPen Housing Corporations' application for the Cypress Point affordable housing development in Moss Beach, located in my Assembly District.

The need for housing, and more importantly, affordable housing, has reached a crisis point throughout California. The need is even more acute in San Mateo County, with one of the highest for-sale and rental housing markets in the nation. Addressing our housing crisis is one of my top priorities, and we need to increase housing production throughout San Mateo County, including the coastal region. Those working in the agricultural, hospitality, medical services and retail industries deserve the opportunity to live in quality homes near their jobs.

I support the Cypress Point development for the following reasons:

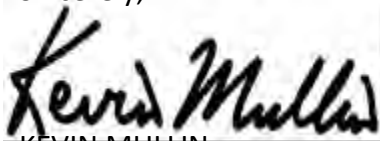
- I represent constituents of all income levels in my district and this proposal helps meet a vital need for my low-income constituents on the coast.
- The nearly 11-acre site for the proposed project in one of only three sites in the San Mateo County Midcoast designated for affordable housing, and the only one currently available.
- MidPen Housing has a strong record of accomplishment of building high quality projects and is a leading nonprofit housing developer in the San Francisco Bay Area and in San Mateo County.
- The project includes a preference for those working or living in the area, helping to ensure that the development benefits those already associated with the coast.
- The proposal reserves nearly half the parcel for open space, and clusters 71 units in a medium-density two-story design. MidPen Housing has been responsive to the community by proposing a reduced density while also increasing the allowable number of affordable homes.

- Water and sewer capacity, two challenges for the San Mateo County Midcoast, are already allocated for the proposed project through San Mateo County's Local Coastal Plan.

Finally, as a region, we have failed to produce the needed housing and much more so affordable housing. We can no longer continue to say no to low-income housing because some believe it does not belong in a particular community, because some think it will affect community character or because it will add trips to an area. Such reasons are exclusionary.

We need to be more inclusive and we have a duty to provide adequate housing for all socioeconomic levels. All communities have a responsibility to do their part. Cypress Point will be an asset to San Mateo County, the Midcoast region, and the community of Moss Beach.

Sincerely,

A handwritten signature in black ink, reading "Kevin Mullin", is written over a light blue rectangular background.

KEVIN MULLIN

Speaker pro Tempore

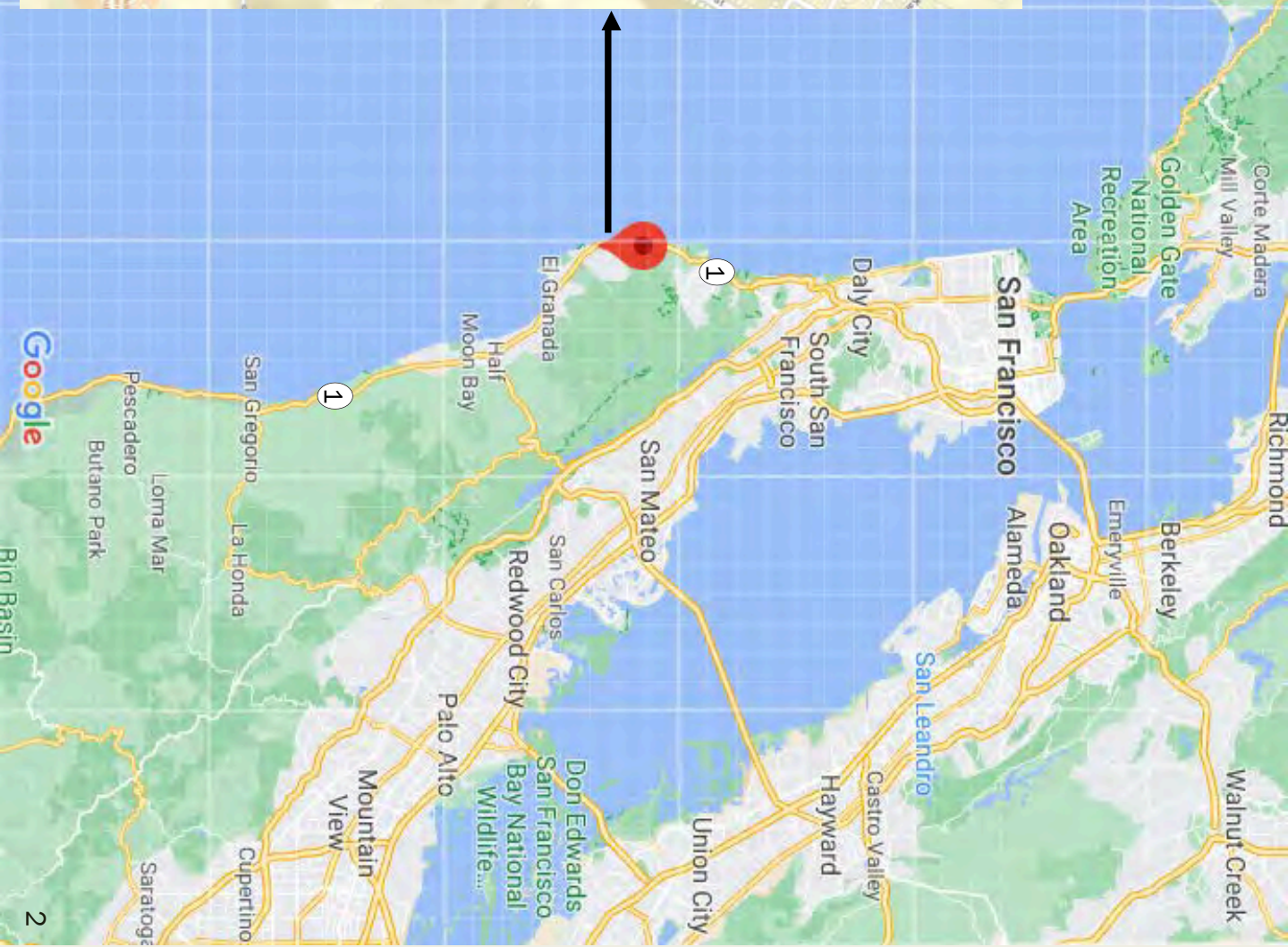


**COUNTY OF SAN MATEO**  
**LCP AMENDMENT**  
**LCP-2-SMC-20-0054-1**  
MidPen Housing Corporation  
Cypress Point Housing Project, Moss Beach  
Item F14a \* March 12, 2021

*A copy of these briefing materials has been provided to CCC staff.*

# LOCATION

The map shows the project area in San Diego, California. The project area is highlighted in yellow and labeled "Project Area". It is located on the coast, near the intersection of the San Diego River and the San Diego Bay. The map also shows the coastline, the San Diego River, and the San Diego Bay. Major roads like Highway 163 and Highway 56 are visible. Other landmarks include the San Diego River, the San Diego Bay, and the San Diego coastline.



# PROPOSED LCPA

- Amend Land Use Plan and Implementation Plan to modify land use designation and zoning, as well as applicable land use plan policies and zoning regulations, for 11-acre parcel in Moss Beach
- Proposed amendment would reduce total number of allowed dwelling units on subject site from 148 (mix of market rate and affordable units) to 71 (all affordable units), resulting in density of 6.5 dwelling units per acre
- Local Coastal Program Amendment (LCPA) necessary to allow MidPen Housing to construct 71-unit affordable Cypress Point Family Community housing project approved pursuant to County CDP



# MIDPEN HOUSING

Our mission is to provide safe, affordable housing of high quality to those in need; establish stability and opportunity in the lives of residents; and foster diverse communities that allow people from all ethnic, social and economic backgrounds to live in dignity, harmony and mutual respect.



# WHO WE SERVE

- Families, seniors, and individuals with special needs
- Low, extremely-low, and moderate income households
- Resident services and property management are critical to our mission





# EXISTING LAND USE

- 11-acre infill site designated Medium-High Density Residential
- Planned Unit Development (PUD) approved in 1986 and allows for 148 units
- One of three priority affordable housing sites identified in LCP in 1982 and in 12 subsequent updates; included in County Housing Element





# AFFORDABLE HOUSING NEED

- No income-restricted affordable housing in Midcoast area of San Mateo County
- 1,544 jobs in Montara, Moss Beach and El Granada \*
  - 61% have salaries <\$40,000
  - 42% commute >10 miles to work
  - Major industries: retail, accommodations and food services
- Options for many workers are:
  - Long commutes or
  - Unstable, substandard housing
- LCPA ensures site will be 100% affordable

*\*Source: U.S. Census Bureau, OnTheMap Application, <https://onthemap.ces.census.gov>, 2018 data*

# COMMUNITY OUTREACH

- Extensive outreach carried out, including:
  - 3 Community Open Houses
  - 50+ meetings with neighbors, business owners, and groups
  - 2 public presentations to community (independent of project hearings)
- Significant updates to project proposal in response to feedback, including:
  - Reduced number of units from 80 to 71
  - Increased parking ratio to 2:1
  - Lowered building heights



# PREVIOUSLY APPROVED PUD

- Density: 148 units
- Parking: 2 spaces per unit = 296 total
- Open space: limited due to density
- Affordability: 35% low- and moderate-income

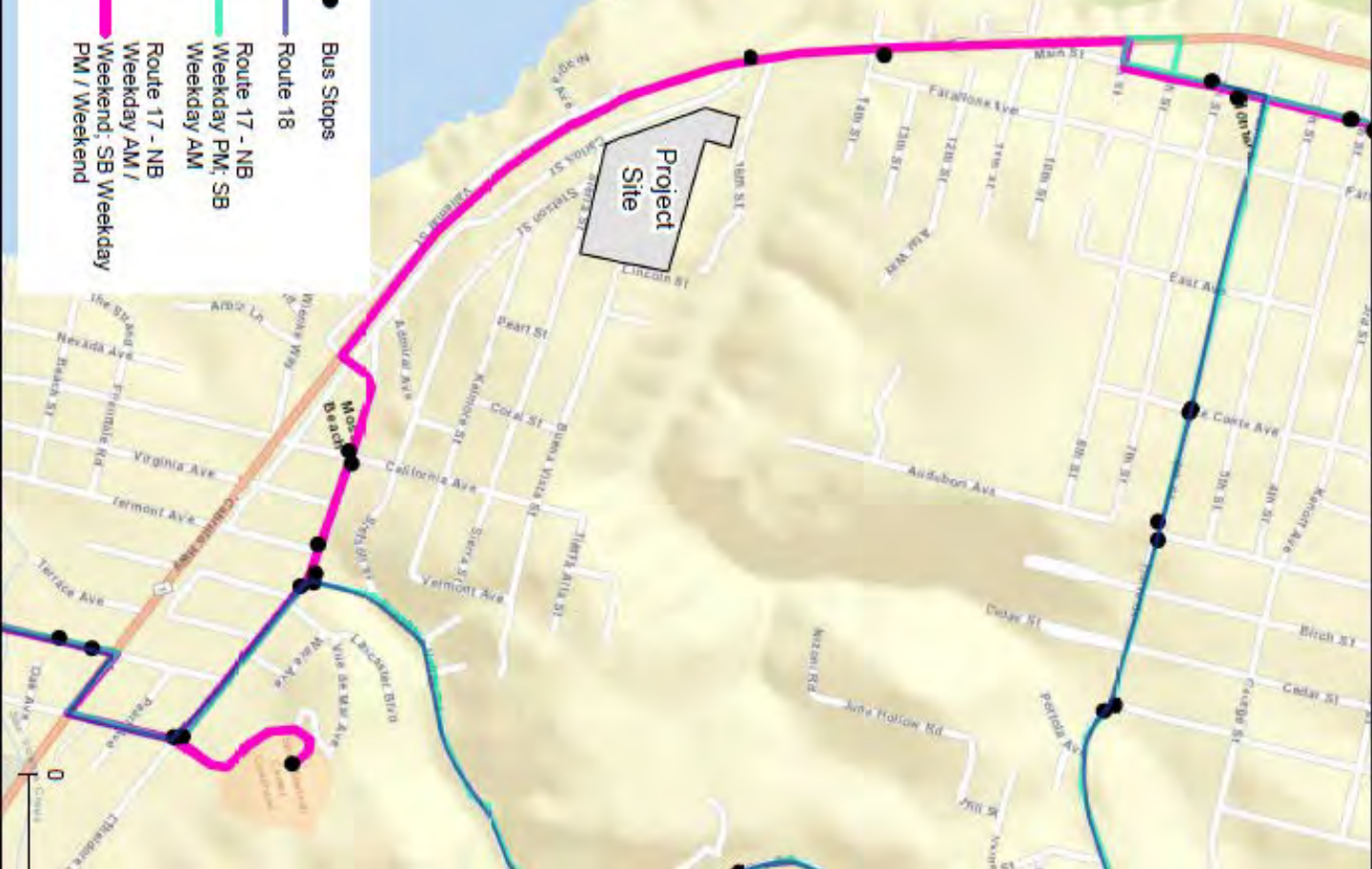




# MIDPEN PROPOSAL

- **Density:** 71 units
- **Parking:** 2 spaces per unit = 142 total
- **Open space:** Half of site to remain undeveloped
- **Affordability:** 100% low-income (excluding manager's unit)
- LCPA approved unanimously by County Board of Supervisors





# TRAFFIC AND MOBILITY

- MidPen to pay fair share contribution to regional transportation improvements
- Project to include street upgrades in the neighborhood that will:
  - *address pre-existing safety issue near Highway 1 intersection*
  - *improve pedestrian/bike facilities*
  - *strengthen connections to regional transit*



# PROTECTION OF NATURAL RESOURCES

- No ESHA/wetlands on site
- ~50% of site to remain in natural state
- Project to incorporate passive recreation and trails throughout site
- Reduction of intensity from existing land use reduces impact on all resources



# BALANCING SITE CONTEXT and COMMUNITY NEED

- Proposed density is consistent with surrounding neighborhood
  - Surrounding area = *6.1 to 8.7 units per acre*
  - Proposed project = *6.5 units per acre*
- Proposed layout that will
  - *Preserve open area for residents and community*
  - *Protect scenic/visual qualities*
- 75% of units will have a lease-up preference for existing residents/workers on the Coastside



# PROJECT AFFORDABILITY

Range of Bedrooms Per Unit

1 Br	2 Br	3 Br	Total
16	37	18	71

Range of Affordability

Area Median Income (AMI)	Income Range (across unit types)	Number of Units
30% AMI	\$22,200 - \$54,540	7
40% AMI	\$29,604 - \$72,720	18
50% AMI	\$37,020 - \$79,200	35
80% AMI	\$71,100 - \$145,440	10
Manager	N/A	1

*\*Based on 2018 Income Limits for San Mateo County from California's Tax Credit Allocation Committee. Final income and rent levels to be established based on final regulatory agreements and tenant population*



# PROPOSED RENT RANGES

INCOME LEVEL (% of Area Median Income)	1 BEDROOM	2 BEDROOM	3 BEDROOM
30%	\$740	\$888	\$1026
40%	\$987	\$1185	\$1369
50%	\$1234	\$1481	\$1711
80%	N/A	\$2370	\$2738

*\*Based on 2018 Income Limits for San Mateo County from California's Tax Credit Allocation Committee. Final income and rent levels to be established based on final regulatory agreements and tenant population*

# STAFF RECOMMENDATION

- Staff is recommending approval of LCPA as submitted by the County
  - Certify LUP amendment as submitted
  - Certify IP amendment as submitted
- Findings of LCPA as submitted will:
  - Require any future development on site to be 100% affordable for low-income households
  - Help achieve environmental justice objectives
  - Protect coastal resources

# CONCLUSION

County and project proponent are in ***agreement*** with the staff recommendation for approval of the LCPA as submitted.





*Sensible planning and protection  
for the San Mateo County Midcoast*

March 5, 2021

Dear Honorable Commissioners,

We are writing to urge that the Coastal Commission require a further review of this project and the impacts of an LCP amendment for this site.

Midcoast ECO recognizes the need for affordable housing, and urges the building of housing projects to be focused in opportunity-oriented, transportation-efficient communities that support income-challenged residents to advance economically. Housing projects should be developed where there is sufficient infrastructure, and supporting services, schools, shopping, local jobs, community offerings, public transit and walkability.

The San Mateo County Coast is unique in that there is just one road in through and out. Increased housing and development in isolated semi-rural areas without adequate supporting infrastructure and services is a disservice to current residents and to the affordable housing beneficiaries who would face an increased transportation burden.

The Coastal Commission's environmental justice mission requires balancing of affordable housing needs with the public coastal access and water-oriented recreation needs of People of Color and economically disadvantaged persons. The Staff Report is lacking review of potential alternative sites that could better serve the interest of social justice.

We ask that further review to explore the alternatives be considered before the LCP amendment is finalized.

Thank you for your consideration,

Midcoast ECO Board of Directors

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)

March 5, 2021

*Via Email*

California Coastal Commission  
[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)

**RE: San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1  
Cypress Point Project  
Agenda Item 14a – March 12, 2021**

Dear Honorable Commissioners,

This office submits the following comments on behalf of Midcoast ECO regarding the California Coastal Commission Staff's review pursuant to the California Environmental Quality Act (CEQA) and the California Coastal Act of 1976 (Coastal Act) of the above-referenced proposed amendment to San Mateo County's Local Coastal Program (LCP). The LCP Amendment consists of both a proposed Land Use Plan (LUP) Amendment and a Local Implementation Plan (LIP) Amendment for the proposed Cypress Point Planned Unit Development (PUD).

For the reasons discussed below and in those comment those previously submitted to the Coastal Commission, Midcoast ECO respectfully requests that the proposed LCP Amendment be denied, or, alternatively, that consideration of the proposed LCP Amendment be continued to a future date after the required CEQA evaluation and Coastal Act Chapter 3 consistency analyses have been provided for public review and comment.

**I. Coastal Commission Staff's Environmental Review of the Proposed San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 Fails to Comply With CEQA.**

**A. The Coastal Commission's CEQA Duties.**

Approval of the proposed LCP Amendment by the Coastal Commission must comply with all of CEQA's substantive requirements. (Pub. Res. Code, §§ 21080.5, 21080.9.)

Specifically, the Coastal Commission's duties under CEQA are those of a state agency with a regulatory program subject to Public Resources Code section 21080.5 (§ 21080.5), which is part of CEQA. Section 21080.5 allows the Secretary of the Resources

Agency to certify a state agency as exempt from CEQA's formal EIR preparation requirement if the program requires that the project be preceded by the preparation of a plan or written documentation "containing sufficient environmental . . . information." (*Environmental Protection Information Center, Inc. v. Johnson* (1985) 170 Cal.App.3d 604, 620, 610 (*EPIC*); see *Mountain Lion Foundation v. Fish & Game Com.* (1997) 16 Cal.4th 105, 113-114, 116.) Section 21080.5, subdivision (d), prescribes what sufficient environmental information must consist of, as well as additional public review procedures a state agency with a regulatory program certified under section 21080.5 must follow. (*Mountain Lion Foundation*, 16 Cal.4th at pp. 126-127; *EPIC*, 170 Cal.App.3d at pp. 610-611.) The Secretary of the Resources Agency has determined that the Coastal Commission's regulatory program of approving LCPs and LCP amendments qualifies for certification under section 21080.5. (CEQA Guideline 15251, subd. (f).) This then means the Coastal Commission's staff reports -- its "written documentation" in the jargon of CEQA (§21080.5, subdivision (a)) -- "serve as a functional equivalent of an EIR." (*Mountain Lion Foundation*, 16 Cal.4th at p. 113; see *EPIC*, 170 Cal.App.3d at p. 611.)

Courts have made clear that section 21080.5 establishes but "a limited [CEQA] exemption" (*Mountain Lion Foundation*, 16 Cal.4th at p. 126; see *EPIC*, 170 Cal.App.3d at p. 616.) This means that as a state agency certified under section 21080.5, the Coastal Commission is exempt *only* from CEQA's formal EIR requirement. (See § 21080.5, subd. (c).) As a state agency with a regulatory program certified under section 21080.5, the Coastal Commission still "must comply with *all* of CEQA's other requirements. [Citations.]" (*Mountain Lion Foundation*, 16 Cal.4th at p. 114, emphasis added; see *EPIC*, 170 Cal.App.3d at pp. 616-618, 620.) These requirements include, among other things, the fundamental public duties set forth in sections 21000 and 21002 to fully identify and evaluate in its staff reports a project's adverse environmental effects, and to mitigate those effects through adoption of feasible alternatives or mitigation measures. (§ 21080.5, subd. (d).) Furthermore, the environmental documentation prepared by a certified state agency must support its conclusions with "references to specific scientific and empirical evidence." (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043, 1047.) It "must *demonstrate* [in the written documentation available for public review] strict compliance with its certified regulatory program. [Citations.]" (*Mountain Lion Foundation*, 16 Cal.4th at p. 132, emphasis added.)

In summary, the Coastal Commission's staff report here must fulfill a critical information disclosure role. It is intended to serve as both the functional equivalent of an EIR and the purveyor of the Coastal Commission's findings explaining its decisions and tracing the findings to substantial supporting evidence (see Cal. Code Regs., tit. 14, §§ 13057, subd. (c)(1), (2), 13092, subd. (a), 13096, subd. (a)); and so the staff report is the vehicle for the Coastal Commission to demonstrate strict compliance with its regulatory program. In the Coastal Commission's decisionmaking process, the staff reports are to the public and the members of the Coastal Commission what EIRs are to the public and other decisionmaking bodies with permit programs that do not fall under section 21080.5. Therefore, if the Coastal Commission approves a local government's proposed LCP amendment, but the data and environmental evaluations within its staff report fall short of CEQA's information disclosure requirements and the Coastal Commission's own CEQA

regulations, then the Coastal Commission prejudicially abuses its discretion under CEQA and its decision is vulnerable to writ of mandate relief from the courts.

As described in greater detail below, the Coastal Commission will violate CEQA (1) if it fails to analyze the reasonably foreseeable impacts of the proposed LCP Amendment, (2) if it fails to analyze the impacts of the proposed LCP Amendment to the existing environment, (3) if it fails to evaluate and respond to public comments, (4) if it fails to evaluate the cumulative impacts of the LCP Amendment, and (5) if its conclusion of no significant environmental impact is not supported by substantial evidence. In addition, Midcoast ECO raises the CEQA deficiencies raised in its previous correspondence to the Coastal Commission detailed in Section I.E. below.

B. The Coastal Commission Staff Report Fails to Analyze the Reasonably Foreseeable Impacts of the Proposed LCP Amendment.

The proposed LCP Amendment is a fundamental land use decision that will guide the future growth and development of the site and will result in reasonably foreseeable physical changes in the environment. 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.) The Coastal Commission’s Staff Report acknowledges that the LCP Amendment includes specific development plan requirements, permitted uses, density, height, setbacks, lot coverage, floor area, landscaping, outdoor lighting, and parking provisions for the MidPen project, and even includes a site plan with which future development must conform, referencing Exhibit 5 and its proposed 18 two-story residential apartment buildings. Evidently, the LCP Amendment directly serves to facilitate MidPen’s project, a more than reasonably foreseeable project, thus resulting in direct and indirect physical changes in the environment, onsite and offsite, many of which MidPen itself admits will be significant adverse impacts.<sup>1</sup>

Because the LCP Amendment thus will likely result in ultimate physical changes in the environment, the scope of the Coastal Commission’s CEQA review must be the reasonably foreseeable effect of these changes (the site-specific development) on the environment. (See *DeVita v. County of Napa* (1995) 9 Cal.4th 763, 793–794; see also *Black Prop. Owners Assn. v. City of Berkeley* (1994) 22 Cal.App.4th 974, 985.) Environmental effects include “[i]ndirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or

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<sup>1</sup> For CEQA and Coastal Act purposes, a project’s impacts (or “effects”) on the environment include cumulative effects. The Coastal Act specifically defines such effects and requires their review by the Coastal Commission where it is reasonably foreseeable that an LCP amendment or other project before the Coastal Commission will result in new residential, commercial or industrial development. “‘Cumulatively’ or ‘cumulative effect’ means the incremental effects of an individual project *shall be reviewed* in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” (Pub. Resources Code, § 30105.5, emphasis added; see *id.*, § 30250; CEQA Guideline 15355 & 15358.)



growth rate, and related effects on air and water and other natural systems, including ecosystems.” (CEQA Guideline 15358, subd. (a)(2).) Again, in evaluating the significance of the environmental effect of a project, a public agency must consider not only direct physical changes in the environment which may be caused by a project, but also reasonably foreseeable indirect physical changes. (CEQA Guideline 15064, subd. (d).)

Despite this unequivocal legal requirement, Coastal Commission Staff has failed to analyze the reasonably foreseeable impacts of the residential development allowed by the LCP Amendment. Rather than engage in the analysis needed for informed decision making and public participation, Staff has impermissibly forestalled that analysis to a “subsequent process” in regards to *inter alia* reasonably foreseeable traffic, biology, hazardous soils, wastewater and fire risk impacts.

Based on its impermissibly truncated review, Coastal Commission Staff have found that “the proposed LCP amendment is not expected to result in any significant environmental effects.” The conclusion of no significant adverse impacts from reasonable foreseeable development is in fact contradicted by substantial evidence of potentially significant impacts. That evidence was submitted to the Coastal Commission’s North Central Coast District.

In addition, based on the Coastal Commission’s finding that there are no potential significant adverse environmental effects from the proposed amendment, Staff commits another CEQA error of failing to even consider project alternatives or mitigation measures.<sup>2</sup> Put another way, if the Coastal Commission approves the LCP Amendment premised on the Staff Report’s short-sighted environmental review, the Commission will have taken action that significantly furthers the reasonably foreseeable site-specific residential development while foreclosing alternatives or mitigation measures that would otherwise be part of the CEQA review for the coastal development permit for that development. An alternative site-specific project inconsistent with the LCP Amendment will no longer be considered legally feasible. This manner of proceeding violates CEQA. (See *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 138 and cases cited.) Simply put, disclosure and evaluation of the reasonably foreseeable impacts of MidPen’s housing development, as well as evaluation of alternatives (including alternative locations that would better serve the environmental and environmental justice, economic and social interests at stake) may not be deferred to the later coastal development permit stage.

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<sup>2</sup> The public, as far back as June 2019, submitted comments to the Coastal Commission questioning whether traffic impacts would be adequately mitigated. Proposed mitigations impermissibly defer mitigations until after project approval. TRAF-1B consists of a vague “Transportation Demand Management Plan” which will not even be formulated for public review or the Coastal Commission’s consideration until after project approval. As MidPen acknowledged, the effectiveness of this plan can “not” be guaranteed.



C. The Coastal Commission Staff Report Fails to Analyze the Impacts of the Proposed LCP Amendment to the Existing Environment.

Coastal Commission Staff has also improperly skirted adequate evaluation of the potential environmental impacts of the LCP Amendment by comparing the amendment to the hypothetical development allowable under the existing LCP (the current but never implemented site designation of PUD-124), rather than to the existing physical conditions on the ground. For example, the Staff Report argues (at p. 9):

“With regard to road and traffic capacity, the project site would be accessible from existing roadways with primary access from Carlos Street and a second emergency vehicle access point from Lincoln Street. There are existing noted traffic deficiencies in the surrounding area, including an existing Level of Service E or F for Etheldore and California Street intersections with Highway 1 during commute periods, that could be exacerbated by any development at the proposed location. However, the proposed reduction in density at the site, *as compared to the existing land use designation*, would reduce the potential traffic generated from any subsequent development.” (Emphasis added.)

This manner of proceeding violates CEQA. The error pervades not only the traffic impacts review (VMT, circulation, energy consumption, capacity), but also Staff’s evaluation of water and sewer impacts, fire risk and evacuation impacts, visual/aesthetic impacts, cultural/archeological impacts, as well as biological and sensitive habitat impacts.

“Under CEQA, a public agency must determine what, if any, effect on the environment a proposed project may have. To do so, a public agency must first make a fair assessment of existing physical conditions (i.e., baseline physical conditions) and then compare it to the anticipated or expected physical conditions were the project to be completed, thereby allowing the agency to focus on the nature and degree of changes expected in those physical conditions after the project and whether those changes result in any significant effect on the existing environment.” (*Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1037, citing CEQA Guideline 15125, subd. (a) and *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 319–321, 328.) The existing environment is not the existing LCP.

The comparison must be “between existing physical conditions without the project and the conditions expected to be produced by the project.” (*County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 955.) Without such a comparison, the agency’s environmental review will not inform decision makers and the public of the project’s significant environmental impacts. (*Communities*, 48 Cal.4th at p. 328.)

“A long line of Court of Appeal decisions holds, in similar terms, that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, rather than to allowable conditions defined by a plan or regulatory framework. This line of authority includes cases where a plan or regulation allowed for greater development or more intense activity than had so far actually occurred.” (*Communities*, 48 Cal.4th at p. 321.) The California Supreme Court has explained that “[i]n each of these decisions, the appellate court concluded the baseline for CEQA analysis must be the ‘existing physical conditions in the affected area’ (*Environmental Planning Information Council v. County of El Dorado*, 131 Cal.App.3d at p. 354) that is, the ‘real conditions on the ground’ (*Save Our Peninsula Committee v. Monterey County Bd. of Supervisors*, 87 Cal.App.4th at p. 121; see *City of Carmel-by-the-Sea v. Board of Supervisors*, 183 Cal.App.3d at p. 246), rather than the level of development or activity that could or should have been present according to a plan or regulation.” *Communities*, 48 Cal. 4th at 321.)

The case of *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229 is particularly instructive. There, a hotel subject to a coastal LUP permitting the development of up to 75 residential units sought rezoning. The court of appeal expressly rejected the argument that no significant impacts could result because the maximum number of units allowed under the rezoning would be lower - 65. The court explained: “A comparison between what is possible under the LUP and what is possible under the rezoning bears no relation to real conditions on the ground.” (*Id.* at p. 246.)

The Coastal Commission Staff Report’s approach using hypothetical allowable conditions under PUD-124 as the baseline results in an “illusory” comparison that “can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts,” a result directly at odds with CEQA. (*Communities* at p. 322, citing *Environmental Planning Information Council*, 131 Cal.App.3d at p. 358.)

D. The Coastal Commission Staff Report Improperly Defers Analysis of Project Impacts Until After Approval of the LCP Amendment

It is a fundamental principle of CEQA that potentially significant project environmental impacts must be analyzed before project approval.

Despite this, the Coastal Commission Staff Report improperly defers the required analysis of the impacts of the LCP Amendment to a subsequent process in regards to traffic, environmental justice, coastal resources (water, sewer, and circulation), sensitive habitats, fire risk, aesthetics, and water availability impacts.

Each of these errors violates CEQA, but the California Supreme Court has provided important relevant guidance particularly regarding water availability.

First, CEQA's informational purposes are not satisfied by environmental analysis “that simply ignores or assumes a solution to the problem of supplying water to a proposed land use project. Decision makers must, under the law, be presented with

sufficient facts to “evaluate the pros and cons of supplying the amount of water that the [project] will need.” (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 430–31 citing *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 829.)

Second, an adequate environmental impact analysis “cannot be limited to the water supply for the first stage or the first few years. ...CEQA's demand for meaningful information “is not satisfied by simply stating information will be provided in the future.” *Id.* at 431.

“Third, the future water supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations (“paper water”) are insufficient bases for decisionmaking under CEQA. An EIR for a land use project must address the impacts of likely future water sources, and the EIR's discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water's availability. [citations omitted.] *Id.* at 432.

E. The Coastal Commission Staff Report Fails to Evaluate and Respond to Public Comments.

The Coastal Commission Staff Report must provide written responses to significant environmental points raised during the public evaluation process for the project. (§ 21080.5, subd. (d)(2)(D); see Cal. Code Regs., tit. 14, § 13057, subd. (c)(3).) Failure to do so is prejudicial error under CEQA. (*Mountain Lion Foundation*, 16 Cal.4th at pp. 122-123, 133; *EPIC*, 170 Cal.App.3d at pp. 627-629.) CEQA Guideline 15088 likewise requires that an agency evaluate comments on environmental issues and prepare a written response describing the disposition of significant environmental issues raised, particularly where the agency's position is at variance with recommendations and objections raised in the comments. (See *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 882 [agency response “did not provide a detailed, reasoned analysis of why the suggested measure for clustering of wells and infrastructure when feasible was not accepted. As such, the response did not comply with the requirements of Guidelines section 15088, subdivision (c) or CEQA”].)

As reflected in the Coastal Commission's correspondence file for this proposed project, this office commented to the Coastal Commission on October 16, 2020 and February 8, 2021. The February 8, 2021 submittal attached copies of comments previously submitted to San Mateo County on January 22, 2020, June 8, 2020 and July 21, 2020, and the Coastal Commission's own two prior comment letters on this project. In addition, on January 21, 2021, this office submitted to the Coastal Commission significant expert comments from Pang Engineers, Matt Hagemann (SWAPE), Steve Powell (BioMaAS Inc.), Robert W. Emerick and Bryan Jessop related to project traffic and transportation, soil contamination, sewage wastewater, and biological impacts, and the lack of adequate analysis of and mitigation for these impacts.

Regrettably, the Coastal Commission Staff Report contains no written response to the significant environmental points we raised. As we noted before, the fact that the Coastal Commission need not circulate a final EIR does not exempt it from compliance with CEQA's substantive environmental review requirements, including providing written responses to public comments.

F. The Coastal Commission Staff Report Fails to Evaluate the Cumulative Impacts of the Proposed LCP Amendment.

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. (See fn. 1, *ante*.)

Despite this, the Staff Report avoids the required analysis of cumulative impacts while cursorily concluding that the proposed LCP Amendment will not result in any significant adverse environmental effects, including with regard to potential cumulative impacts. But the Staff Report jumps to this conclusion without discussing the cumulative traffic impacts from tourism and related projects, such as the Big Wave project, Best Western Hotel Half Moon Bay, Pacific Ridge, Mavericks Multiplex and other approved and reasonably foreseeable projects in the San Mateo County coastal zone.

Further, there has been no analysis of whether the expanded sewage line and potential pump station for the reasonably foreseeable residential development will increase development intensity or facilitate other off-site development by facilitating second units or ADUs (Accessory Dwelling Units) in the project vicinity.

**II. The Proposed Project is Inconsistent with the Coastal Act.**

As Midcoast ECO commented in its February 8, 2021 correspondence, the proposed LCP Amendment project is inconsistent with the Coastal Act as it 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. (Pub. Resources Code, § 30001.5.)

The LCP Amendment does not conform with the requirements of Coastal Act Chapter 3 commencing with section 30200. (See Pub. Resources Code, §§ 30512 – 30514, 30200.) The Chapter 3 policies are the standards for judging the adequacy of an LCP. (*McAllister v. County of Monterey* (2007) 147 Cal.App.4th 253, 272.)

The comments above -- regarding Staff's failure under CEQA to adequately analyze the reasonably foreseeable impacts of the proposed LCP Amendment, improper comparison of the LCP Amendment to the current PUD-124 designation, and failure to

evaluate the cumulative impacts of the LCP Amendment -- are equally applicable to the analysis of whether the project is consistent with the Coastal Act.

A. LCP Amendment Inconsistency with 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, and will not be served by adequate public services or offsite road infrastructure.

Even the inadequate traffic analysis conducted by MidPen to date concludes that the reasonable foreseeable development 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.

Significant questions have been raised by peer review (Pang Engineers) of MidPen’s traffic discussion, showing that it is deeply flawed. Caltrans and the San Mateo County Department of Public Works have raised serious points about how the reasonably foreseeable development will overburden the Highway 1 and not be adequately served by transit services. Also, 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.<sup>3</sup>

In addition, serious wastewater issues have been raised because of the location of the site and the condition of the sewer system. The reasonably foreseeable development is located within the Montara Water & Sanitary District (MWSD), which is located at the

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<sup>3</sup> Courts have recognized time and again that the more degraded a baseline condition is, the greater the potential for cumulative harm from an individual project that incrementally increases the harm, and the greater the need to prevent incremental degradation, even if, in and of itself, the incremental degradation is below a threshold of significance. (See *Coastal Southwest Development Corp. v. California Coastal Zone Conservation Com.* (1976) 55 Cal.App.3d 525, 538 [degraded visual setting; “a site which represents a diminishing coastal resource is to be preserved and gives a stronger reason for its preservation as such resource”]; accord, *Kirkorowicz v. California Coastal Com.* (2000) 83 Cal.App.4th 980, 994-995 [degraded wetlands]; *Bolsa Chica Land Trust v. Superior Court* (1999) 71 Cal.App.4th 493, 507-508 [degraded environmentally sensitive habitat area]; *Los Angeles Unified School Dist. v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1027-1028 [degraded urban acoustic environment]; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721 [degraded air basin].)

furthest end of the Intertie Pipe System (IPS) from the Sewer Authority Mid-Coastside (SAM) wastewater treatment facility. 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 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 released into the Pacific Ocean and Half Moon Bay.

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 acre offsite generating runoff that drains through the project site and contributes to the overall drainage area. Drainage out of the project retention ponds and stormwater runoff has the potential to adversely impact wetlands.

An adequate analysis of the wastewater impacts of the reasonably foreseeable development has not been completed or released to the public to date. To assure consistency with the public (ocean) recreation policies of Chapter 3 of the Coastal Act (§§ 30220–30224) as well as Coastal Act sections 30230–30232, Staff must evaluate potential project impacts in light of the history of sewage spills, the SAM Infrastructure Plan, the Force Main segment replacements and Pump Station as the status of each program element described within the Capitol Improvement Plan.

Coastal Act section 30232 specifically mandates "[p]rotection against the spillage of crude oil, gas, petroleum products, or [other] hazardous substances . . . in relation to any development or transportation of such materials." (Emphasis added.) The Coastal Commission staff report completely ignores Coastal Act sections 30230–30232. As such, it offers no analytic basis for finding the LCP Amendment consistent with Coastal Act sections 30230–30232. This is not a minor Chapter 3 inconsistency. The Project site drains into Montara Creek within the James V. Fitzgerald Area of Specific Biological Significance watershed area. Coastal Act section 30230, which requires that "[m]arine resources . . . be maintained, enhanced, and, where feasible, restored[,]" expressly calls for "[s]pecial protection [to] be given to areas and species of special biological or economic significance." "Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes."

No utility plans have been completed for the proposed project yet. Therefore, what actually is proposed is not adequately described, and thus cannot demonstrate, based on substantial evidence, that the LCP Amendment is consistent with Chapter 3 policies it

implicates. No sanitary sewer infrastructure currently exists 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.

It is reasonably likely that a pump station will be needed for the project and if improperly designed could result in more raw sewage spills into the coastal waters and waters of the United States. The Coastal Commission may not ignore these risks under Chapter 3 of the Coastal Act. At its closest point, the project site is located only 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 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 site's northern border before 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 geomorphology 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, and to prevent future disputes about developer obligations at the CDP stage, that impact must be evaluated now and it must be fully mitigated as part of the LCP Amendment.

**B. LCP Amendment Inconsistency with Coastal Act section 30253.**

The reasonably foreseeable development will not minimize energy consumption because it will be located far from any commercial uses or development. Also, there has been no analysis yet of vehicle miles traveled. Coastal Act section 30253 requires energy consumption and vehicle miles traveled to be minimized. (*Id.*, subd. (d).) The Coastal Commission Staff Report does not offer any standard or threshold for the Coastal Commission to use to find consistency with this Chapter 3 policy, as applied in the impacted coastal zone area.

Midcoast ECO, through this office, has submitted substantial evidence of the known high fire risk and landslide risks at this site, yet the Coastal Commission Staff Report does not consider these risks in evaluating Chapter 3 consistency. 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, adversely impacts 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. These are significant issues that cannot be swept under the proverbial rug in a LCP amendment process (Coastal Act section 30253, subds. (a), (c)) -- certainly not in the wake of the mega-fires of 2020 which have only confirmed that catastrophic

wildland fires are the new normal in California, including along the central coast, as climate change increases fire intensity (predisposing dried out vegetation into ever drier conditions, augmenting fuel loads), the length of the fire season, and public water systems are at increasing risk of public safety power shutoffs (PSPSs or de-energizing events).<sup>4</sup>

C. LCP Amendment Inconsistency with Coastal Act Section 30254.

As discussed above, new or expanded sewage facilities will likely be required and there is evidence of potentially significant adverse impacts from such facilities.

State Highway Route 1 in this rural area of the coastal zone may not remain a scenic two-lane road with the addition of the reasonably foreseeable development. MidPen and the County have considered the need for roundabouts or additional lanes to handle the expected traffic from the reasonably foreseeable development.

There has been inadequate analysis of the effects on public recreation, commercial recreation, and visitor-serving land from the reasonably foreseeable development and whether such uses will be precluded or coastal visitor access interfered with.

The reasonably foreseeable development from the proposed LCP Amendment will likely preclude basic traffic, sewage, and water services to other developments.

D. LCP Amendment Inconsistency with Coastal Act Sections 30107.3 and 30604, subdivision (h).

The Coastal Commission Staff report does not consider pollution burdens. It fails to consider the evidence submitted regarding 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 including an incinerator.

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 areas of the property. Despite these baseline conditions, the project site apparently has

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<sup>4</sup> Analyses of decades of data tracking California wildfires and the destruction they've wrought show that wildfires and their compounding effects, including effects on air quality, have intensified in recent years. "The last 10 years have shattered records. 2020 tops them all. Record-breaking wildfires are occurring more often. Eight of the 10 largest fires in California history have burned in the past decade." (Krishnakumar & Kannan, *The Worst Fire Season Ever. Again*, L.A. Times (Aug. 15, 2020), available at <https://www.latimes.com/projects/california-fires-damage-climate-change-analysis/> [as of Mar. 5, 2021].)

Fire hazard and associated air quality impacts raise an LCP Amendment issue that should not have been ignored. (Coastal Act section 30253, subs. (a), (c).)



not been tested for asbestos in soil and groundwater by MidPen or San Mateo County.

This testing must be performed before findings of LCP Amendment consistency with Coastal Act sections 30230–30232 may be made, and such findings, supported by substantial evidence, must be made before the LCP Amendment may be approved. (See Coastal Act §§ 30200, subd. (a), 30512.)

A Phase II ESA sampling investigation 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 based on terrestrial habitat exposure. An additional investigation found the concentration of lead in soil at boring CS-3 was found to be 290 mg/kg – nine times the ESL.

To these points, note that MidPen’s Public Services and Utilities report (Stevens Consulting, July 2018) does not address pollutant loads. In regards to wastewater, pollutant loads ultimately become sludge that requires its own treatment and disposal. There has been no analysis of sludge treatment capacity and long-term sludge disposal capacity from the reasonably foreseeable development as well as associated with likely ADUs.

E. LCP Amendment Inconsistency with Coastal Act Section 30240.

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 San Mateo County 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 **project surface runoff will discharge to Montara Creek within the Fitzgerald Area of Specific Biological Significance watershed area:**

“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 thereafter (e.g., accounting for atmospheric river events, also on the rise due to climate change), 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, given the likelihood that asbestos or other hazardous substances are present on this site, the discharges to the Creek, the ASBS and the wetlands may also transport these hazardous substances into the ASBS.

There is no discussion or evidence in the Coastal Commission Staff Report addressing the level of significance of these impacts to the ASBS and Montara Creek ESHA. Hence, there is no evidence before the Coastal Commission to allow the Coastal Commission to find that the ESHA will be protected against any significant disruption of its habitat values, or that the stormwater discharges to Montara Creek and the James V. Fitzgerald ASBS may be considered “uses dependent on” these ESHA resources. (See Coastal Act § 30240.)

F. The LCP Amendment Conflicts With the LCP.

The proposed LCP Amendment conflicts with the Land Use Plan policies of the LCP and the Coastal Commission Staff Report has not adequately analyzed the inconsistencies for the reasons stated and in the comments previously submitted to the Coastal Commission.

Thank you for your careful consideration of these issues.

Sincerely,



Brian Gaffney



San Mateo, Santa Clara & San Benito Counties

March 5, 2021

California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105

Via Email to: Manna, Jeannine@Coastal <[Jeannine.Manna@coastal.ca.gov](mailto:Jeannine.Manna@coastal.ca.gov)>, Rexing, Stephanie@Coastal <[Stephanie.Rexing@coastal.ca.gov](mailto:Stephanie.Rexing@coastal.ca.gov)>, Carl, Dan@Coastal <[Dan.Carl@coastal.ca.gov](mailto:Dan.Carl@coastal.ca.gov)>

Re: San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

Dear Coastal Commissioners,

The Sierra Club Loma Prieta Chapter does not dispute that the density reduction in this LCP Amendment per your staff report is something of an improvement over the existing LCP designation but we do not share staff's implied optimism that the project's numerous problems can be cured through a CDP process and we continue to hold that a completely auto dependent development (market rate or affordable) in this location does not reflect 21st century awareness of the need to significantly constrain Vehicle Miles Travelled (VMT). The site is not bikeable or walkable, not served by transit and has very questionable circulation mitigations under consideration. Burdening the lower income community with inescapable and significant automotive costs is counter-productive to the intended purpose of the development.

The nearest supermarket is 6 + miles to the north in Pacifica but is unlikely to be frequented because other services are 7+ miles to the south in Half Moon Bay. Those physically remote services are the Middle School, the High School, the Library, the Boys & Girls Club, the County Medical Center, Sonrisas Dental Clinic, physicians' offices, and 2 shopping centers containing Safeway and New Leaf Supermarkets plus CVS and Rite-Aid pharmacies.

None of the preceding amenities are credibly available in Moss Beach.

We have yet to have heard a credible rationale for the applicant's withdrawal from participation in negotiations for a much superior walkable/bikeable site in Half Moon Bay. This is what the affected community prefers. Their preference should have some importance in the decision-making process.

If the Commission approves this density reduction then we will yet need to continue to participate in the CDP process and hold a candle to the project's innate deficiencies.

Thank you for your attention and service,

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, Conservation Committee, Sierra Club Loma Prieta Chapter

CC: James Eggers, Executive Director, Sierra Club Loma Prieta Chapter

Steve Padilla, Chair, California Coastal Commission



March 2, 2021

*SENT VIA EMAIL*

California Coastal Commission  
North Central Coast District  
455 Market Street, Suite 300  
San Francisco, CA 94105

***RE: Support – Cypress Point***

Dear California Coastal Commission,

The Bay Area Council endorses the Cypress Point affordable housing project.

At the intersection of business and civic leadership, the Bay Area Council is a public-policy advocacy organization for the nine-county Bay Area working to solve the most challenging regional issues. The Council proactively advocates for a strong economy, a vital business environment, and a better quality of life for everyone who lives here. California is currently experiencing an unprecedented housing crisis that, without significant intervention, will only get worse. The California Department of Housing and Community Development estimates the state needs to build 180,000 new units of housing annually by 2025 to meet projected growth - over 100,000 more units than we are currently building annually. The region has long been an engine of growth and prosperity, but it has also increasingly become marked by unaffordability and income inequality. The bottom 25% of income earners are spending 76% of their income on housing. The Bay Area's nine counties and 101 cities permitted only 57% of the new homes needed to meet the demands of population growth and maintain baseline levels of affordability. This is clearly not acceptable or sustainable.

Every city in our region must play their part to house its workforce. The Council is disheartened to hear that no deed-restricted affordable housing exists in this coastal community. There is a significant need for additional housing in Moss Beach, especially at affordable levels. For this and other reasons described below, the Bay Area Council supports this proposed development:

- **Deep Affordability Levels** - The proposed project is Moss Beach's first 100% affordable housing project - ever. Affordability levels range from 30-80% AMI and reserves 4 units for formerly homeless households.
- **Amenities** – The proposal includes a community center for residents and is pedestrian and bicycle-friendly. It also includes a community garden and a play area for children. MidPen Housing will also provide programming and community activities for residents.
- **Neighborhood Collaboration** – Over the course of the past four years, MidPen has held multiple open houses, small group sessions, and one on one meetings in addition to numerous presentations to local community/business groups. The project has been modified to alleviate neighborhood concerns regarding height, density, parking, proximity to neighbors, and local traffic.

Although the Council encourages approval of the Cypress Point project, we are concerned that this project does not maximize the site's potential. As one of only three Local Coastal Plan (LCP) designated sites for affordable housing, the 7 units per acre proposal is a missed opportunity to deliver more units of much-needed affordable housing to the community.

Furthermore, the 2:1 parking ratio yields a project with a footprint for parking larger than the housing itself. The Council recommends that as the project progresses, MidPen Housing work closely with current stakeholders, decision-makers and future potential partners to find ways to increase the number of affordable homes delivered as a result of this project. This is a time for leadership. We have a responsibility to our community to realize the change we seek through sound housing policy. We ought to do what we know to be right, absent the influence of entrenched interests that work against that vision.

The Council applauds MidPen Housing for their responsiveness to the community and encourages the California Coastal Commission to consider the severe lack of affordable housing in this coastal community when deciding whether to certify the San Mateo County LCP amendment. Please let us know if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Matt Regan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Matt Regan  
Senior Vice President  
Bay Area Council



February 25, 2020

Chair Steve Padilla  
And Members of the California Coastal Commission

Re: Support Item 14 - Changes to San Mateo County's Local Coastal Program,

Dear California Coastal Commission,

On behalf of the **Housing Leadership Council of San Mateo County (HLC)**, I am writing to express our support for Midpen's 71 affordable homes in Moss Beach, as well as the needed changes to San Mateo County's Local Coastal Program. The Housing Leadership Council of San Mateo County works with communities and their leaders to create and preserve quality affordable homes.

We need to provide housing at all income levels so that we can preserve our community and protect our most vulnerable residents. However there is currently no deed-restricted affordable housing in the mid-coast of San Mateo County. Midpen's Cypress Point can provide those desperately needed affordable homes with dignity and privacy. Moss Beach can continue to benefit from diversity and inclusion with these proposed homes. **The California Coastal Commission's approval of changes to San Mateo County's Local Coastal Program are critical to unlocking these potential homes.**

Cypress Point's 71 affordable homes have been in the planning process for quite some time. Many residents facing rent burdens and those living in their cars do not have any time to spare. Vulnerable coastside individuals and families desperately needed these homes yesterday. Our public health crisis has highlighted how housing is healthcare. **We appreciate the California Coastal Commission leadership in moving these needed changes forward.**

Sincerely,

Alexander Melendrez  
Digital Organizer, Housing Leadership Council

**Housing Leadership Council of San Mateo County**  
2905 S. El Camino Real, San Mateo, CA 94403 • (650) 242-1764 • hlcsmc.org



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Tuesday, March 9, 2021 6:17 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

*Maria Elena Marquez*



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**From:** Richard Klein <richk@richk.com>  
**Sent:** Tuesday, March 09, 2021 4:10 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I enthusiastically support MidPen's plans for affordable housing at this site. We are in desperate need of more affordable housing everywhere in the region. This plan has been repeatedly revised based on community input, and is almost ready to go. Any delays will result in more homelessness and people living in dangerous crowded conditions. Affordable housing right here on the Coastside should result in fewer trips "over the hill" as folks have the option of living close to work. Opponents argue that they are "for" affordable housing but just not at this location. Unfortunately, there are very few other suitable locations, and it would probably delay construction by 10 years or more if an alternative site was mandated. We certainly need affordable housing at any alternative locations as well. Please support this well-designed project which helps meet our desperate need for more affordable housing.

Richard Klein  
El Granada

## Martinez, Erik@Coastal

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**From:** Ann Rothman <honzey3@comcast.net>  
**Sent:** Tuesday, March 9, 2021 1:40 AM  
**To:** NorthCentralCoast@Coastal; Martinez, Erik@Coastal; cgroom@smcgov.org  
**Cc:** Ann Rothman ♡  
**Subject:** Subject: FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Attachments:** Video.MOV; Video\_1.MOV

Dear Commissioners,

I am Ann Rothman, a 28 year resident of Moss Beach and am writing to ask you to Oppose the proposed LCP amendment change from planned unit development PUD - 124 to PUD - 140 which reduces density and increases future development to 100% affordable from the current designation of 35% affordable housing and the remainder as market rate. Market rate housing on the coast is half the cost of housing on the peninsula. The coast offers an affordable option of housing for all income levels and provides an inclusive environment for people of all races, income, age, disabilities, sexual orientation etc.. Moss Beach provides market rate housing at half the cost of the peninsula, 227 space rent controlled manufactured homes, housing for developmentally disabled adults (recently broke ground) , a new RV Park just approved, and Cypress Point as is currently planned would provide 148 mixed income housing units. Just 6 miles down the road in Half Moon Bay is a 52 room homeless hotel which may be converted into permanent housing in the future. Middle class families who during the pandemic have been negatively impacted but may not qualify for low income benefits need mixed rate housing that the current PUD 124 allows for. Many are living on the edge of needing assistance themselves. Once they get back to work they will need a place to live and may not qualify for affordable housing but can't afford the market rate of towns like Burlingame and San Mateo. The coast offers them a housing option at market rate significantly less expensive than surrounding areas. Change to the current LCP would lead to the loss of 96 units of desperately needed market rate housing units in order to gain 18 affordable units. Market rate housing allows for preference of those who work on the coast to live there. HUD requirements does not allow for these preferences.

Regardless of LCP designation further research needs to be conducted to the viability of building anything at this site as it is home to an endangered species, the California Red- Legged Frog.

The site for the proposed project is in the migration zone of an endangered species, the federally protected California Red-Legged Frog. I have attached a video where you can hear the mating calls of male California Red- Legged frogs located in front of the Moss Beach Post Office in the culvert which runs alongside highway 1. On the north end of the property sits Montara Creek, an identified ESHA and south of the property down Carlos Street is where the culvert is located and where I have video of mating California red- legged frogs. Clearly this places the proposed development in the middle of the migration area. According to [federalregister.gov](https://www.federalregister.gov) , "California's red legged frogs's terrestrial activity in coastal forest and grassland habitats and recommends at least a 328 ft bufferzone for protection of adjacent aquatic and upland habitat, as well as seasonal restrictions for activities within this zone. In a recent study also specific to the California red legged frog, Fellers and Kleeman(2007,pp.278-280) recommend establishing zones around breeding habitat, non-breeding habitat, and migration corridors that are sufficient to protect function of the amphibian habitat. However, Fellers and Kleeman(2007, p.279) discourage setting specific distances for these zones due to differences in biological or site-specific requirements; they further state that any distances set for avoidance of upland habitat should be made on a case by case basis, taking into account the need to protect breeding and non-breeding habitat as well as any migration corridors." Experts have found California red-legged frogs migration can cover 2 miles. The proposed site of the development and proposed traffic mitigation areas fall directly in the migration zone and established habitat of the California red-legged frogs. According to Page 20 of the Summary of Staff Recommendation (LCP-2-SMC-20-0054-1 Cypress Point PUD states that Montara Creek is the closest sensitive habitat on sight at 250 feet from the northern property line which puts it inside of the bufferzone that should be a minimum of 328 feet +. The newly identified site at the Moss Beach post office suggests migration and places the proposed development in ESHA . Article 5 of the Coastal

Act specifically protects sensitive habitats. According to [fws.gov](https://www.fws.gov) "The California red-legged frog recovery plan provides a strategy for recovery of the species. Recovery objectives in the recovery plan include: 1) protecting existing populations by reducing threats; 2) restoring and creating habitat that will be protected and managed in perpetuity; 3) surveying and monitoring populations and conducting research on the biology of and threats to the species; and 4) re-establishing populations of the species within its historic range."

In order to protect the California red-legged frogs the roads and coastal trail cannot be built in the proposed areas of the Connect the Coastside plan. Traffic mitigation is not possible in and around the endangered species locations. This endangered species has been found by Connect the Coastside and Caltrans and is documented. According to [coastal.ca.gov](https://coastal.ca.gov) Article 5 Section 30240" Environmentally sensitive habitat areas; adjacent developments a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values and only uses dependent on those resources shall be allowed within those areas. b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas." A full environmental review is necessary to evaluate the legality and feasibility of any housing development at Cypress Point and any traffic mitigation measures necessary for the development.

The proposed changes to the LCP would create an environment of segregation. I participated in a TeleTown Hall June 24, 2020 with Congresswoman Jackie Speier and Dr John Gates, a diversity training specialist and "one of our country's thought leaders on issues of diversity and racial bias". Dr John Gates is Vice Provost for Diversity and Inclusion and Clinical professor in the Krannest School of Management at Purdue University. Please see attached video of my question regarding 100% affordable housing causing segregation vs mixed income housing which is affordable and market rate housing. Both Dr Gates and Congresswoman Speier said that it did. Dr Gates said " that mixed housing provides a gateway to equality economically and otherwise. He stated that more mixed income housing is necessary and we should do more."

The current LCP provides the mixed income housing Dr Gates said we should strive to have and Congresswoman Speier agreed. Equality and Equity is achieved through the current LCP. To change that would be regressive and cause segregation hurting the very people you hope to help with affordable housing.

Furthermore it hurts the surrounding community in reduced building fees and connection fees to the water and sewer system that is owned by the residents of Moss Beach and Montara. Homeowners of Moss Beach and Montara own MWSD and are paying for it through property taxes. Any and all improvements to the water and sewer systems fall squarely on the shoulders of homeowners. If Cypress Point were mixed income housing higher fees would be paid by the developer and could be passed on to market rate renters. Now any additional fees have to be paid by homeowners. Please review the below videos and Vote No on the proposed amendments to the LCP and do not approve changes to the PUD 124. Thank you for your consideration.

Sincerely,  
Ann Rothman

Sent from my iPhone

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 6:48 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Sue Digre <suedigre@gmail.com>  
**Sent:** Monday, March 8, 2021 4:12 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

3 12 Friday agenda item 14.

Regarding Affordable Housing.

Sue Digre

[suedigre@gmail.com](mailto:suedigre@gmail.com)

PARCA Family Services & ADVOCACY DEPARTMENT Director ( serving those who have a devopmental disability & their families).

.....

Item 14 COMMENT:

Regarding those who have a developmental disability, Coastal Commiasion Leadership is needed to set aside a reasonable percentage of affordable housing units per project for those who have a devopmental disability.

These folks are capable persons ,eager to contribute to their local community.

Without your mandates towards housing set asides they will have to be "shipped" far away from familiar people and places.

Yes, they need various degrees of "wrap around services" to be indendent renters..

These supporta do exist .

But

housing units are not available.

Your leadership is needed to enable equitable access to housing where they can live, work and contribute to their local communities.

Thank you for caring.

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** scott graham <scottg08123@gmail.com>  
**Sent:** Sunday, March 7, 2021 8:05 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Coastal Comission,

The proposed project in Moss Beach heights should not be allowed to proceed. The traffic will truly be a nightmare, disastrous to Montara and Moss Beach residents affecting all. There is no possible mitigation strategy to accomodate the size and scope of this project. This will truly destroy the last rural open space in our community. No resident here wants it. Please reconsider the zoning as roads don't exist for one thousand-1500 added trips on highway 1.

Sincerely distraught,

Scott Graham 495 stetson st Moss Beach

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Paula Amen Judah <paulaamenjudah@gmail.com>  
**Sent:** Sunday, March 7, 2021 12:04 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** midcoasteco@gmail.com  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

TO: California Coastal Commission

FROM: A deeply concerned citizen

RE: Proposed Zoning Amendment for Midpen Housing Project

Unfortunately, I've only recently been made aware of this project, which will greatly affect the welfare of our family who live in Moss Beach. It's clear that the project is being rushed through solely to expedite profit for Midpen developers and with callous disregard for the well-being of nearby residents, whose safety, serenity, and property values will be affected. I urge the CCC to consider the existing studies, which advise against such a project. CCC must require in-depth assessments of the environmental, economic, and sociological effects on the citizens of surrounding areas before moving ahead with this ill-advised project.

Multiple legitimate concerns exist regarding the proposed project, and none have been fully examined and discussed. The load on the highway is a huge consideration. I've had to enter busy Hwy 1 from Moss Beach, and it's already very dangerous. Drivers must wait long for a safe opening in the flow of high-speed traffic. To load it up even more is idiotic. Worse, is to allow this project--ANY project--to be approved without a thorough EIR. It's simply unconscionable to rush a project solely in service of Midpen's bottom line without regard for the impact on the families who LIVE in the beautiful small town of Moss Beach.

Do the right thing. Put a stop on this poorly studied mercenary project.

Thank you,

Mark Schmitt  
Paula Amen-Judah Schmitt  
Elders of a Moss Beach family



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Adela Vanremoortere <plagedemoss@icloud.com>  
**Sent:** Saturday, March 6, 2021 11:36 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear California Coastal Commission,

I'm writing out of concern regarding the proposed construction of MidPen Housing Cypress Point project to be constructed in Moss Beach. I feel it is the wrong location for. Multi-family housing due to many reasons, one being that the traffic along HWY 1 at the corner of California Ave and Hwy 1 is a particularly a dangerous corner. There have been numerous accidents at that intersection and even after the county installed a cross walk, crossing the street is still a risky maneuver for any pedestrian. Irresponsible drivers (and they are many) do not slow down, not even for pedestrians. It is even more dangerous for young student to have to cross over in order to commute to the local elementary school known as Farallone View Elementary located in Montara CA. Many children along this intersection are driven to school because the speed limit is 50 miles hour and like I mentioned, drivers often do obey local speed limits or take time to slow down for a pedestrian attempting to cross the highway. This makes it dangerous for a child even a teenager to walk to school and easily cross the highway. I cannot imagine another 300 residents plus adding to the traffic issues. The commutes to schools are already arduous.

Introducing another 72 units and potentially 360 additional residents, not to mention even more people with sub-leasing to more residents, will only impact the area more seriously making for crossing that intersection even more difficult local residents, It's difficult enough for a vehicle to merge onto the highway.

Another reason that the Cypress Project is not a good location is that there are no no local grocery market and upper grade level schools require commuting by car.

Moss Beach does not have a local market in this area other than a small liquor store located at the same dangerous intersection. Introducing more residents, particularly at such large numbers will only increase the further more traffic issues that have not been resolved. A greater number of people will have to commute in their cars to the nearest grocery stores for their shopping and locals will be burdened with having to drive their students to school since most families in this locality find Local Sam Trans is not adequate for commuting. Our local junior high and high school is much to far for for walking and even taking the bus is a timely process.

Half Moon Bay is a more adequate location for additional apartment complexes since there are more grocery stores, schools and necessary commerce.

Regards,  
Adela Van Remoortere

The California Coastal Commission (CCC) will hold a public hearing to approve a zoning and LCP amendment in support of MidPen Housing's oversized Cypress Point project proposed for Moss Beach. While we support affordable housing efforts, this proposed project continues to present

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item 14a (Cypress Point Affordable housing project)

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**From:** Ginny McShane <ginny@coastside.net>  
**Sent:** Saturday, March 6, 2021 12:40 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item 14a (Cypress Point Affordable housing project)

It was about ten years ago that the MWSD water district was unable to provide water to the children's park in Moss Beach. About the same time, this same MWSD water company was unable to provide water to my neighbor on Etheldore St. when their well failed. How is it possible now for MWSD to provide water to the proposed multiple housing development off of Sierra in Moss Beach?

I have seen alot in the past 40 years of living in Moss Beach. The most recent was the outrageous water/sanitary rates/taxes in MWSD. Also, there exists the difficult working consolidation of SAM. The litigation rates we pay on our tax bills is suffocating families who have moved here in good faith to raise their families.

Also, let's not forget the conflagration we had in 2020 on the Coastside. Do we have enough water to service such a conflagration if it occurs within our Moss Beach, Montara, and El Granada/Princeton boundaries?

I am not convinced MWSD has the ability/compacity to protect our homes and inhabitants.

Sincerely,  
Ginny McShane  
local citizen

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** skipbarbara <skipbarbara@sbcglobal.net>  
**Sent:** Saturday, March 6, 2021 2:36 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I wish to voice my strong opposition to San Mateo Amendment LCP-2-0054-1 Cypress Point. The project simply will not accomplish the purpose being put forth. The coast does not have the transportation nor employment for low income residence. Nor can the school district support it. It appears to me that the real intent of this project and perhaps hidden purpose and support is not for low income.

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:36 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



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**From:** Alastair Duncan <aduncanmbca@icloud.com>  
**Sent:** Friday, March 05, 2021 5:00 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** aduncan8888@gmail.com  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

5 March 2021

530 Buena Vista Street

Beach, CA 94038

Moss

Dear Coastal Commission Representatives,

As the Coastal Commission moves to consider The Cypress Point Housing development in Moss Beach, CA, near the Pacific Ocean coastal area, I urge you reject the proposal as inappropriately situated in an area without enough facilities to promote healthy economic and social living, as you carefully consider the many limitations and impediments to creating supportive, sustainable housing to residents. Although the goal to provide housing is worthy, the specified project and its remote location presents many obvious drawbacks which need to be directly considered and evaluated. The project would be better suited to a location in Half Moon Bay, and should be rejected for the Carlos Street location currently requested for your approval.

The access is constricted and dangerous. The local infrastructure is severely limited for potential new residents, as there is limited government support, grocery and clothing shops, health care, adequate public transportation, auto repair, parks, social workers, libraries, bookstores, tool supplies, sport sites, trades providers, kindergarten, high schools, pet care, and all the facets of a developed area. Most of those are readily available in Half Moon Bay and Pacifica, but not in Moss Beach.

Please reject the proposed project and changes to zoning. Thank you.



Shown: The proposed Carlos Street access is dangerously narrow and has no room for enlargement, making access unsuitable.

Sincerely,

Alec Duncan  
530 Buena Vista Street  
Moss Beach, CA 94038




**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:37 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Ann Rothman <honzey3@comcast.net>  
Sent: Friday, March 05, 2021 5:19 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: Ann Rothman  <honzey3@comcast.net>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear commissioners, I had written an extensive letter to be submitted to the commission prior to the deadline at 5 PM today. However when I tried to submit it just prior to 5 PM all data appears to be lost. Please allow me an extension to re-type my letter and submit so that the commissioners may review my important information. Thank you for your consideration of this matter.

Sent from my iPhone

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:34 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Brittani Baxter <brittani.baxter@gmail.com>  
**Sent:** Friday, March 05, 2021 3:32 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners,

Thank you for your service to our region.

I wanted to voice my strong support for changes to the Local Coastal Program that would allow the affordable housing project at Moss Beach to go forward -- related to Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project ).

I feel passionately about affordable housing since I'm a homeowner here in San Mateo County and I've seen the impact of our housing crisis firsthand:

- Many of our favorite small businesses struggle to hire or retain workers due to the unaffordable cost of housing here
- Most of our friends have had to move out of the area due to the high cost of housing
- As someone invested in the community, it makes me worried about our future if we can't retain a local workforce. I like to visit local restaurants, shops, and services, and want these businesses to be able to hire workers and stay open. I would like our local schools and city/emergency services to be able to retain employees as well.

When we talk with friends, or workers at our favorite local businesses, they often share their stories of how much time and energy the search for decent housing consumes in their day to day life. We've heard of landlords selling buildings and forcing renters to scramble, or a long-married couple debating whether they would be able to raise a child in a small apartment -- knowing they're tight on space, but struggling to figure out what's possible before they're too old to have kids. Others have to commute in to work here from unthinkable distances -- 2 hours each way from the central valley. Not only is that commute untenable for workers, it's also unfortunately terrible for the environment. My partner and I have also struggled with figuring out how we would afford both housing and childcare here in our region, even though we're well-compensated -- and if it's tough for us, we know it's even worse for others. We are all truly at a breaking point with the cost of housing.

We all have to work together to figure out how to solve our regional housing crisis, and solutions like this project at Moss Beach should be one of many tools in our toolbelt. I know there are many employees who work in hospitality, tourism, agriculture, food service, and more along the coast, and I think this would be a fantastic site to allow them to live close to work.

Although 71 homes is barely a drop in the bucket compared to what we need region-wide, it's a start, and I think it would be a great addition to the coastside area, where so much has already been built for tourism and commerce. Please help support the essential workers who power our community by enabling this essential housing project.

Thanks again,  
Brittani Baxter  
San Carlos, CA

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:34 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: beresini@coastside.net <beresini@coastside.net>  
Sent: Friday, March 05, 2021 3:48 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Coastal Commission Officers,

As one of the residents of the unincorporated community of Moss Beach where the proposed project is to be located I urge you to not approve the LCP amendments at this time. The developer, Mid Peninsula Housing and San Mateo County have not address basic issues that the project creates at the coastwise and in the small surrounding communities. This are and not limited to:

Traffic into and out of the development. Although the parcel is less than 50 yards from a road that enters directly to Highway 1. All the proposed development shows traffic going through your neighborhood streets to use an intersection over 500 yards away. This will mean an estimated 200+ cars traveling on narrow streets with room for only one car at a time where cars are legally parked. A main proposed route is on a narrow street without sidewalks which is constantly used by pedestrians. The road runs parallel to HWY 1 from the highway access they don't want to use to the one they do want to use. The local firetruck has difficulty making its way through the streets at times.

Infrastructure: The local sewer service has been fined a substantial number of times for hunderds of thousands of dollars for waste discharge into the ocean. Adding this many housing units will greatly increase the need for additional sewer capacity. The local residents will bear the cost of additional fines caused by the lack of capacity. We were just hit with a large additional increase billed on our property taxes to help cover ongoing penalties and infrastructure to supply water to another development, 'Big Wave'. We have to expect that we will bear the brunt of the cost on the new project as well given the exemptions they will be granted. Water in this area is provided by wells only. In drought years we do to have access to additional resources. The local area has been on water restrictions for the 30 plus years we have lived in the area. With the new development of proposed hotels, Big Wave development with the expansion of a brewery and local home builders and ADU units being built nobody is willing ti discuss the long term impact on out water supply.

Additional Highway traffic on Highway 1 which typically is backed up from Linda Mar in Pacific into Moss Beach, 5 miles on most weekend afternoons and some weekdays. Traffic is also stalled on weekends from just north of El Granada into

Half Moon Day for most of the day. Many locals couldn't travel on the weekends due to the long delays. This new development which has no shopping, health services or much local employment opportunity within at least 5 miles will add to the issues.

The original LCP was done many years ago. They thought a 4 lane freeway was going to come over Montara Mountain, skirt around the back side of Montara and Moss Beach then converge with the existing road near the local airport. Instead a 2 lane tunnel was ultimately built in keeping with area's scale. The development's reduction in the number of units, from 140 or so single family homes on lots to higher density housing with fewer units seems on the surface to be a nice concession. This is not the case. We do not have the roads envisioned nor do we have the infrastructure that would have come with that 4 lane highway development, i.e. jobs, local shopping, possible incorporated cities, etc.

As we move through this process I generally get the response from governing bodies that the next phase or county will ultimately resolve the issues I've described. However we are not seeing any interest by the county or the developer to address the communities and coast's concerns. Something as simple as providing access to the development directly from HWY1 and not through the communities narrow streets has not been done on any of the proposals presented. Water and Sewage concerns are waived off and kicked down the road. The project keeps changing as well. With your approval we expect yet another development proposed which will not be close to the past renditions.

I ask that you delay the LCP approval until the above issues are addressed. We are a small community with our local representation heavily weighted by the populations on the east side of the local coastal range. So our leverage to get a project that works with the community is not strong unless we have others working to assure we have a strong process.

Best Regards,

Brian Beresini  
Maureen Beresini

611 Stetson Street,  
Moss Beach, ca. 94038

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:36 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Bryan Jessop <bryan@morchellawildfoods.com>  
**Sent:** Friday, March 05, 2021 4:59 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I live on 14th Street in Montara, which is just across Montara Creek from the proposed Cypress Point development. As a forager and naturalist, I spend more time than anyone hiking in the riparian zone along Montara Creek. I am concerned that the environmental impacts of this development have not been adequately assessed. I previously submitted a letter to the San Mateo County Planning Commission with some of my concerns:

[https://aba8fa87-438c-463e-9c20-e5efea553b42.filesusr.com/ugd/23fa31\\_a53298bd5ff54413aef0da829882d5da.pdf](https://aba8fa87-438c-463e-9c20-e5efea553b42.filesusr.com/ugd/23fa31_a53298bd5ff54413aef0da829882d5da.pdf)

Specifically, I want to reiterate that the environmental review that has been relied on in this matter incorrectly labels the parcel's ecology as "invasive grasslands" when it is in fact forested with Monterey pine trees that are native to San Mateo County. This review also omits dozens of species of native plants that I observed there during a brief survey. If even some of the most prominent native plants were missed or omitted, one can have no confidence that sufficient effort was made to search for the rare and protected species known to exist in the area.

I have also observed our California red-legged frogs in this riparian zone and well above the creek along 14th Street. There is no question that development here would have some level of impact on this endangered species.

We are living in a time that's calling on all of us to act urgently to steward our natural resources for future generations. I urge you to require a full Environmental Impact Report before allowing this approval process to progress further.



Sincerely,  
Bryan Jessop

--

Bryan Jessop  
Morchella Wild Foods  
(619) 994-8668  
[www.morchellawildfoods.com](http://www.morchellawildfoods.com)

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:35 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



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**From:** Christine Corwin <christine@greensrc.com>  
**Sent:** Friday, March 05, 2021 4:40 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear California Coastal Commission:

As a Moss Beach resident since 2010, I am writing to express my deep concern about the Cypress Point Affordable Housing Project. While I recognize that low-income housing is needed in the San Francisco Bay Area, the rural community of Moss Beach is a poor location for a large-scale housing development project.

The San Mateo County Coastsides is at a breaking point. Since moving to Moss Beach 11 years ago, my husband and I have experienced the worsening traffic congestion, house building boom, the outdated and inadequate water infrastructure, and emergency evacuation issues with only one road (Highway 1) in and out of the coast. The coast can barely support the population that it has now, and we are bracing for the additional strain of the Big Wave Commercial Development Project, the Harbor Village RV Park, and other approved developments—projects which have been greenlighted in a vacuum without any comprehensive development plan to ensure the protection of our coastal environment, scenic values, and community safety.

Now the County is trying to push through a large-scale housing development (the Cypress Point Affordable Housing Project) in Moss Beach far away from jobs, services, and adequate public transportation. The project fails on all Smart growth fronts.

The California Coastal Commission's mission is:

**To protect and enhance 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.**

I deeply appreciate the work of the California Coastal Commission. As you consider amending the zoning and LCP to allow the large-scale Cypress Point Affordable Housing Project on the already strained Coastsides, I urge you to please consider the mission of your agency. **Please ask yourselves as Commissioners if the location, size, and impacts of the project will protect and enhance California's coast for future generations? Without an Environmental Impact Report, has the project been through careful planning with rigorous use of science?**

For the future of our coast, please do not give in to the pressures of developers and our county government. The California Coastal Commission is the one thing that stands between protecting our precious coastline or losing it to shortsighted, poorly planned development.

Thank you for your consideration.

Sincerely,

Christine Cowdery

1020 Etheldore Street

Moss Beach, CA 94038

**Additional Points**

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable,** guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastside residents for project-specific upgrades.

- **Traffic Impacts are significant and remain unmitigated**

MidPen Housing's application estimates 500 daily new trips will be generated from its proposed project. MidPen Housing's traffic study noted five significant and unavoidable impacts to Highway 1 intersections in Moss Beach. The County and Midpen have downplayed the identified impacts on HWY 1 and neighborhood roads, and defer discussion to the County's Connect the Coastside traffic plan, which is also in process.

- **Connect the Coastside (CTC) traffic plan is being rushed with outdated data**

CTC is being presented by the County in conjunction with MidPen's Cypress Point project. This draft CTC plan is based on outdated traffic data and lacks credible funding sources.

- **Peer Reviews of MidPen's application have been ignored**

Midcoast ECO has engaged the services of experts to peer review MidPen Housing's application. These reports have not been referenced in County presentations or documentation. We have submitted them to the CCC for review and public record, but there has been no response. Click below to read these peer reviews:

- [Traffic](#): Pang Engineers, Inc

- [Hazards, Hazardous Materials and Hydrology](#): SWAPE's Matthew Hagemann

- [Wastewater](#): Civil Engineer Robert W. Emerick, Ph.D., P.E.

- [Biological Resources Assessment](#): Biologist Steve Powell of BioMaAS Inc.

- [Vegetation Assessment](#): Bryan Jessop

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a new reality for the coast. **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and earthquake risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, lack of walkability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

Christine Corwin  
Green Source Consulting  
Office: 650.563.4035  
Mobile: 415.312.8043  
[www.greensrc.com](http://www.greensrc.com)

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:35 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

***Maria Elena Marquez***



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**From:** David <davidjlynn@yahoo.com>  
**Sent:** Friday, March 05, 2021 4:34 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Patricia Chang <patriciaylynn@yahoo.com>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )



We in the community are totally against this project in any form! The following are some of the key salient reasons for our opposition:

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable**, guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastsideresidents for project-specific upgrades.

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• [Hazards, Hazardous Materials and Hydrology](#): SWAPE's Matthew Hagemann

• [Wastewater](#): Civil Engineer Robert W. Emerick, Ph.D., P.E.

• [Biological Resources Assessment](#): Biologist Steve Powell of BioMaAS Inc.

• [Vegetation Assessment](#): Bryan Jessop

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a new reality for the coast. **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and earthquake risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public

transportation, lack of walkability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

Regards,  
David and Patricia Lynn

**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:41 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Dan Haggerty <midcoastdan@gmail.com>  
Sent: Thursday, March 04, 2021 10:03 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I agree with Midcoast ECO's comments regarding the subject line LCP amendment. Please do not approve this LCP Amendment.

Dan Haggerty  
154 Madrid Ave  
El Granada, CA 94018

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:29 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** David Magnuson <tonymag@mac.com>  
**Sent:** Friday, March 5, 2021 6:30 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

The project is oversized under the circumstances. It's being airbrushed as a better alternative to existing zoning, established when the property was transferred out of Navy inventory in the 1980s, around the end of the time the Navy could still dispose of the property with a rubber-stamp FONSI by a GS-9 planner without any environmental assessment.

The 73 units proposed exceeds the original intent of MidPen housing as announced at their opening public meeting to build no more than 39 units at the site. MidPen is largely funded by funds from the county and is thus closely aligned with meeting the metrics of the county planners and supervisors. A little too much metric is being assigned to this location.

Carlos street is a narrow street that sits on a cut over highway 1 at a very steep angle of repose. Twice there have been water main bursts next to the highway below the development in the past 3 years. A slide can be viewed from a point on 16<sup>th</sup> street across the highway in front of the Montara Water office. Carlos street is to provide access to the site and will certainly be subject to heavy loads during construction. These factors have not been considered.

It would be better to leave the zoning the way it is. No commercial developer would be able to do what was proposed without substantial mitigation to the highway one corridor, pedestrian crossing, fire access, stormflow control and firefighting storage capacity. In fact, no commercial developer would be allowed to do what is proposed here without substantial mitigation; yet this project proposes that the traffic impacts will be addressed by the State at sometime in the future. The entire proposal is simply a one-sided justification designed to overwhelm the surrounding residents with paperwork and ram through a project that exceeds the capabilities of the existing infrastructure simply because the county is under pressure to put up single unit housing someplace.

The coastal trail crosses the highway at Carlos street, access to the beach from both Montara and the east side of Moss Beach also crosses the highway at this point, which is a blind curve and a confusing intersection with what is essentially a 3-lane left turn. The area gets more and more outside people here for recreation and the area is dangerous without adding complications.

The county has used this project to develop long term plans for the highway corridor through Moss Beach that provide indefinite and undesirable mitigations such as closure of roads and 'maybe' traffic circles or stop lights. No action has been taken to provide these, yet the county intends to proceed. The State has a long backlog, and a priority system based on accident records and fatalities. Is it fair and reasonable to wait for these to get mitigations that will, frankly, make it much less safe and convenient to access the highway. The proposal for my street, for example, would be to eliminate left turns on the highway and have us drive back down and over a quarter mile to Weinke Way, one-lane wide at the point that meets the intersection of California next to and at 170 degrees to highway one, where traffic frequently

backs up at the stop sign on California. This is typical of the dismissive solutions provided by county and A&E to whitewash this project. I don't take it lightly to say that, it saddens me as a PE and I don't even like writing this but I'm also a bit angry. Sorry.

I would support a smaller affordable housing project at this site. I would support the original zoning with substantial mitigations. I do not support this project as it is. I worked as a planner, civil engineer, and environmental engineer for 27 years, although it was only for the Navy and Army except a little private design work while I was in college, and I have to say I've been horrified by the Risk Communication on the part of San Mateo County planning. Some of the guys I used to work with took jobs at the Engineering Division there, and I always had respect for the county's professionalism until now. The locals here in Moss Beach/Montara include a bunch of old hippies and have been pretty obstreperous and I understand the sense of immovable opposition the planners may have felt. However, that doesn't excuse how serious impacts have not been adequately investigated nor addressed, such as the area drainage system, adjoining creek which underpasses the highway, fire capacity, and slope stability. It doesn't justify tweaking models to show almost no added trips over Hwy92 when you add 200 people to a community where there's about 50 jobs. Neither does it justify saying conditions are satisfied by unplanned and unsubmitted CALTRANS work to be performed at an indeterminate date, while this project is to go forward without mitigation.

Finally, this was a Navy gunnery site and they took pictures. There was an incinerator on the site on the north side, below the existing water tower and above the existing drainage creek. No determination or sampling for heavy metals ever took place to determine if this was an incinerator for silver paper, classified information as the aerial photos would have been. Sampling at those kinds of incinerators would yield heavy metals hostile to marine life; although the clays will adsorb the adipose-loving elements, some leeching could occur. There is a perched aquifer here, my neighbors on the west side of the highway both have wells. The water isn't potable, an old-timer told me about 20 years ago they were told not to drink it, but I don't know if the reason was TCE or fecal coliform. I really wouldn't ask MidPen to study the aquifer, but if the Navy hadn't gotten rid of the property when they did, they might well have done so. I worked at the Western Division Navy Facilities HQ as a PM & later as an environmental engineer, and I know that after 1988, the Navy would never have released this property without investigating an incinerator. There was a garage at the site, but it's not known if any minor maintenance was performed there. They also had munitions, but the old ammo would have been thrown in the ocean back then, over on the Water District property. I worked on environmental closure of small sites at Sonoma, Point Sur, and Ferndale back then, besides being lead RPM at Mare Island before I went overseas, so I have a pretty good idea. I'm not saying it's dangerous, just unknown. Military bases had some strange practices in the old days, in my career I came across a tank filled with hazardous material welding rods at a construction site and 2 buried swimming pools filled with oily dirt (all at different bases), and one concrete tank filled with PCB oil and dirt that sickened the 2 sailors that smashed into it (overseas). What do you know about this base? Why did they have HazMat signs up at the Montara Water HQ area, was it a primary treatment pond for the base? What was there?

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:42 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Frank Bezek <fbez@coastside.net>  
Sent: Friday, March 05, 2021 5:08 AM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Too large a project that strains our infrastructure. Our water, sewage, roads, emergency evacuation(earthquake) are and will be negatively affected by this oversized isolated building site. All the quality of life that my family, friends, neighbors have worked for is degraded by this plan, and at the cost of our existing coastside community. We pay the costs! Include the peer reviews in your report. Cut the size of the project. Don't dump this oversize project on the coastside citizens. The traffic conjection in pandemic times is causing traffic jams now that have secondary roads jammed with cars , and this project would make it worse.



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:38 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



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**From:** Julia M Brinckloe <jmbrinck@comcast.net>  
**Sent:** Friday, March 05, 2021 2:57 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** midcoasteco@gmail.com  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

To the CA Coastal Commission:

My comment is simple. We cannot handle this development!

I have been a resident homeowner in Montara since 1996. Traffic has increased over the years as more people come to the coast to visit or to live. I get that. We all do.

But with the opening of the tunnel, the entire Coastsides experienced a tsunami of traffic that impacted the life of every resident, from Montara to Half Moon Bay. And now plans are in place for massive growth locally. On this two lane road that was never meant to handle the glut of traffic that ALREADY slows travel. Do you seriously think we can handle what you propose?

And forget mass transit. I've taken the bus. It's not New York City transit but very limited bus service for students and adults without cars. Those WITH cars will demolish travel on the roadways. It should not take an hour to drive from Montara to Half Moon Bay, but lately it has. Have you considered the impact on local businesses?

And what about resources? How do we provide mega gallons more water and handle tonnage more sewage? This massive planned complex is ill-conceived and blind to consequence. It will create catastrophic degradation to one of the few remaining places in the Bay Area that is tranquil and protected. Look at Daly City. It was once very much like us.

I sense our pleas are falling on deaf ears. Very likely you've made your decisions to build housing that is **WRONGLY PLACED** in an area that cannot handle it. Can't you come up with a better place for this development plan? You **KNOW** you can.

And as pitiful as it sounds to you who read this—I'm on my knees asking that you do.

We **ALL** deserve better than this plan and you have the authority **not** to approve it.

Thank you for your time.

Very respectfully,

Julia M. Brinckloe  
Montara

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:38 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



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**From:** Geary, Jon (Avison Young - US) <jon.geary@avisonyoung.com>  
**Sent:** Friday, March 05, 2021 3:13 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners:

I write to you today regarding the proposed and highly contentious Cypress Point, Moss Beach project.

First, I wish to express my unwavering support for affordable housing, and smart growth, which is the only sustainable and responsible form of growth, don't you believe?

Towards that end, the Cypress Point project ("Project") fails miserably. And indeed, it even violates their very own *MidPen Mission Statement* as historically indicted on their website 8/22/2018:

"partner w/ cities to promote smart growth strategies that help reduce a city's carbon footprint by bringing much needed housing close to jobs and transit..."

And yet, here they are, doubling the population of a small town in one over-scaled, ill-advised development; MidPen is not, in any way, shape or form 'partnering' with the city it seeks to take over.

There is nothing 'smart' about a high-density housing project in a desert of daily amenities, fully dependent on single-occupancy cars, driving on a highly congested, two-lane, rural road for the most basic needs of daily life, including—

- Job Centers
- General Retail and Automotive services
- Entertainment
- Drug Stores
- Physicians

MidPen also had this to say about their mission, prominently displayed on their website 8/22 2018:

“we created a new paradigm: ..well-managed housing built *near good schools and job*”

(It should be noted that these admirable (yet inconveniently restrictive) values are no-longer found in MidPen’s messaging.)

Public Transit? Forget about it: County bus service that runs once per hour, one-half the day in each direction, is not a viable option for the general public on a daily basis.

I further call your attention to additional claims by MidPen, and how this development so grossly violates their very premise for being:

### **Catalyzing Smart Growth and Revitalizing City Centers**

“MidPen is called upon by city leaders who want to increase their stock of affordable housing <sup>1</sup> as part of their strategy to revitalize underutilized neighborhoods <sup>2</sup>. We partner with them to implement smart growth strategies that help reduce a city’s carbon footprint by bringing much needed housing close to jobs and transit. <sup>3</sup>

1. No, the town of Moss Beach and surrounding communities most certainly Did Not call up MidPen to develop this highly questionable site, and doubling the population
2. No, our area is ‘fully utilized’, and how dare MidPen come here and impose their opinion of our utilization. One only need glance at the traffic, morning, noon, and night; week days and don’t even get started on weekend traffic is tragically over-burdened.
3. This claim is so removed from reality as to be laughable. There is neither jobs nor but the most meager transit in proximity to this abomination.

In short, this project doesn’t even come close to meeting MidPen’s own stated objectives.

### **“...Creating Livable, Walkable, Transit-oriented Communities”**

No, no, and no. Cypress Ridge is none of the above, not even close to it, and should therefore be summarily abandoned.

Additionally, MidPen’s “Advocacy” is stated to be “Building affordable housing close to job centers has also helped to reduce road congestion and negative environmental impacts.”

How is the Cypress Point project even remotely considered in alignment with these objectives? It fails by the most casual scrutiny.

The realities of MidPen’s developments:

Is there any covenant requiring that residents must be employed on the coast? If not, how is this providing anything but additional congestion and car-dependency on all-ready over-burdened, rural roads?

Has there been a parking study at Moon Ridge in Half Moon Bay, to study just how many vehicles per unit occupy the site? If not, how can the parking calculations be accepted as fact and acceptable?

Has there been an audit of Moon Ridge residents to see how many, and who, resides there? Do we know that units are not being sublet for profit?

This doesn’t even touch on the issues of water and waste water, evacuation, blind intersection, etc.

Question: why is there no EIR for such a massive project? Sure, one might say it's not all that big, but viewed in situ and in context, this project is HUGE. And for such a contentious project, wouldn't it be beneficial to have an EIR to lend finality to the local concerns?

Thank you.

Best regards,

Jon Geary

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:34 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Jason Kamin <jkamin@gmail.com>  
Sent: Friday, March 05, 2021 3:38 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I am a resident and home owner in El Granada, 90418.

I'm writing to express my concern with the rushed plan to develop the Cypress Point Affordable Housing Project in Moss Beach.

1. Coastsiders already deal with a great number of power outages and sewer blockages due to insufficient infrastructure along the coast.

Adding more people/units to this can only exacerbate current problems.

Moreover, there are additional environmental issues such as rising sea levels, erosion issues, fires, etc that should also be considered and addressed in any major project injecting such a large number of units (~71) and people (projected ~360) into our community.

2. The traffic on Hwy 1 is already quite congested and constantly backed up. (When I can't drive from El Granada to Half Moon Bay on some afternoons because it'll take 45+ min, that is a real problem!).

This project is projected to increase the number of daily trips by upwards of 500 and this will have a significant impact on the practicality of coastal living.

3. The current (Connect the Coastside) CTC plan is based on outdated data and lacks credible funding sources.

4. Multiple peer reviews of MidPen's application have not been taken into account by the California Coastal Commission (CCC). (for example, Pang Eng Inc; SWAPE - Hagemann; Emerick; BioMaAS Inc - Powell; Jessop)

5. The site currently needs a full environmental report to address the clean up from the '40s and '50s leftover asbestos and lead remnants.

6. The increased strain on coastal evacuation procedures could wind up being very dangerous and/or deadly in the event of fire, earthquake, or tsunami flooding.

7. The impact of 300+ additional residents on the small community environment/infrastructure of available resources is unknown (and questionable, at best). The Coastsides is a small, tight knit community and we need to make sure that we have all of the available resources for all residents who live here.

In conclusion, this project is being considered in a rushed manner ignoring the above points. I am not in support of it moving forward without more thorough investigations (and solutions!) to the problems I've listed.

Thank you for your time.

Sincerely,  
Jason Kamin

531 Isabella Rd  
El Granada, 90418  
412-414-7167



California Coastal Commission: [NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)

RE: San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 Cypress Point  
Project Agenda Item 14a – March 12, 2021

Dear Honorable Commissioners,

I am writing to you in regard to the proposed LCP amendment for Moss Beach. I am a 20-year resident of Moss Beach and I am concerned about the size and impact of such a large project on this semi-rural area of the Coast.

I recognize there is a crisis in the Bay area for affordable housing, and here on the Coast as well. And I support efforts for local solutions that can actually be sustained by our current infrastructure, which is very limited.

On the surface, a decrease in zoning to 71 units seems like a logical reduction, but a large housing development at this site does not adequately consider all the current circumstances of our inadequate local services and limited infrastructure.

This project will produce an estimated 500 daily car trips, entering and exiting from Carlos Street. I have attached photos of Carlos Street and also the intersection of Carlos and Highway 1, where there is a blind curve.

As you can see, Carlos Street is very narrow with no sidewalks and just enough room for one car. The blind curve photos show how challenging it is to turn right on Highway 1 with only about 3 seconds of sight from oncoming vehicles going 50 miles per hour. Here is a link to a video that was produced to show how limited and dangerous these roads are for such a large project: <https://www.youtube.com/watch?v=OaE9hdYPHZE>

When this property was zoned for 148 units back in the 1980's, there was an expectation that we would have the infrastructure to support it. There was to be a multilane highway bypass over the mountain and hundreds of new single and multi-family homes. But when County voters chose the much smaller 2-lane tunnel instead, this permanently constrained the road system. Large-scale developments, like this site, that were planned during that period should have been thoroughly reassessed to better reflect these new realities.

I urge you to require an Environmental Impact Report up front to assess what is an appropriate level of building that can be sustained here. Please base any rezoning on factual research into the current community's needs and the environmental impact of any proposed projects on the community as it currently exists!

Thank you for your consideration,

Karen deMoor, Moss Beach



**Carlos Street, Moss Beach**



Intersection Carlos Street and HWY 1



3 seconds later

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:35 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Katy Tschann-Grimm <katytg@gmail.com>  
**Sent:** Friday, March 05, 2021 4:34 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I would like to encourage the CCC to demand an environmental assessment be completed before any approval of the Cypress Point project. This appears to be an oversized project for the location. I am in favor of low cost housing options. A location within Half Moon Bay, where I live, would put people living close to stores and shops, improving local business without increasing traffic.

Thank you,  
Katy Grimm  
Half Moon Bay

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:39 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Kevin Ma <kevinma.sd@gmail.com>  
**Sent:** Friday, March 05, 2021 12:30 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners,

As a Peninsula resident, and I support the changes to the Local Coastal Program that will allow the current affordable housing proposal to proceed. As the documents show, the changes reduce overall density but do require any development there to support more affordable housing, which is necessary given our regional housing shortage. The modified plan would allow the current derelict site to serve a useful purpose, without significant impact to the surrounding communities and environment.

Sincerely,  
Kevin Ma

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:38 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Karen Rosenstein <karetaker@catsincharge.com>  
Sent: Friday, March 05, 2021 3:09 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Cc: Karen Rosenstein <karetaker@catsincharge.com>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Coastal Commissioners,

I'm greatly concerned about the addition of this housing project to the San Mateo Coastline. As a lifelong Bay Area resident, I understand the need for housing for all, especially at more affordable rates, I believe this project is misplaced.

The project is located in an area of increasing wildfire hazard with limited ways to escape fire danger. My husband and I were evacuated early morning back in late January, 2015 for a grass fire that was burning at our end of Rockaway Canyon. Having friends who have lost their house in the 1991 Oakland Hills fire, we quickly gathered our cat and things and were ready to evacuate in 15 minutes. We then went to the west Rockaway section to watch and hope. We saw it took many of our neighbors over an hour to evacuate because of the narrow road that is Rockaway Beach Avenue. Our neighborhood is just a bit bigger than this project.

Hwy. One no longer provides a quick way up and down the coast between Half Moon Bay and Daly City. Traffic on the weekend in the past year has been beyond capacity many days making it very hard to get out of this area. Even here in Pacifica, we are finding it hard to go to the Linda Mar/Pedro Point area from Rockaway. Adding more cars and more people to this only makes it worse.

And for those who are without a vehicle, bus service in this area is limited to one bus route that operates on an hourly basis. This bus only goes to Linda Mar where passengers would then transfer to another bus to get over the hill to Colma or Daly City. And what are these people to do in case of a mass evacuation???

These are just a few of my concerns about this project. Please listen to and consider our concerns. We live here and we are the ones that have to live with the impacts of this proposed project. I urge the Coastal Commission to ask themselves if this is the best possible use of this land.

Thank you!

Karen Rosenstein

200 Troglia Terrace  
Pacifica, CA 94044



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:39 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Karen Silverstein <karen.silverstein@gmail.com>  
**Sent:** Friday, March 05, 2021 1:23 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

To Whom It May Concern,

I have severe reservations on the MidPen Housing Project, primarily regarding traffic. The congestion on Route 1 is dangerous and unpredictable. Since we moved here 2 years ago, I have become alarmed at how the traffic can be so congested-, that it is even impossible to merge onto Route 1. If there is an emergency, such as what we saw with Paradise City, we could be facing a deadly situation. Even emergency vehicles are threatened. I have been in backed up traffic, where firetrucks and ambulances are unable to get through-- they are slowed down to a standstill and have had to wait and honk horns to get cars to move over. This is not going to be assisted with such a large housing population, that will need vehicles to get to work and daily errands.

Additionally, I've read the peer reviews of the project and I think that there are issues that should be addressed, especially water and hazardous material.

Please consider all the information that you have available, and reject this proposal as it is, and adjust the project so that is a better fit environmentally for the area.

Thank you,  
Karen Silverstein  
912 Hawthorne Street  
Montara, CA 94037

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:38 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

***Maria Elena Marquez***



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**From:** Megan <meg.m.white@gmail.com>  
**Sent:** Friday, March 05, 2021 2:59 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I'm writing today to ask the Coastal Commission NOT to approve a zoning and LCP amendment for MidPen Housing's Cypress Point project proposed for Moss Beach. While I support affordable housing efforts, this proposed project continues to present significant and unaddressed impacts. As I resident of Moss Beach, I can attest that the sewer system is not ready for additional hook ups for such a large housing development. The traffic in unincorporated Half Moon Bay is already terrible and there is nothing planned to help alleviate additional traffic this development will cause. The entry to the development from Hwy 1 is a blind corner where accidents will definitely occur unless a change is made. The road leading to the development, Carlos St., is a single lane. How can this handle hundreds of additional cars trips? A lot of infrastructure needs to be updated before this development should move forward. Please take my comment and the comments of many of my neighbors, those who will be directly affected by this development, into consideration. Thank you.

Sincerely,  
Megan McDow  
Kelmore St., Moss Beach

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:37 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** moots madness <nealschlatter996@gmail.com>  
**Sent:** Friday, March 05, 2021 2:26 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear CCC,

I am writing to express my concerns regarding the proposed MidPen Cypress Point Zoning and LCP Amendment. I am a long term resident of Montara/MossBeach and support affordable housing but concerned about the size, location, and lack of consideration to concerns expressed and presented to you by the MidCoast Eco organization and others in the community.

As noted, the size of this project is out of balance to the size of our community, the infrastructure, and environment. These concerns have been well documented by MidCoast Eco, and have been presented to you so I will not reiterate or copy them here, however I am voicing my opposition to this project.

I am submitting a speaker's slip and plan on attending the CCC meeting on 3/12.

Respectfully,  
Neal Schlatter

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:35 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



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**From:** patricia lynn <patriciaylynn@yahoo.com>  
**Sent:** Friday, March 05, 2021 4:34 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** David Lynn <davidjlynn01@gmail.com>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear California Coastal Commission:

I support sustainable development and low income housing. But this project is completely in the wrong location. I can't think of a worse site. This project should be stopped as Midpen look for an alternative site with adequate infrastructure, sewer, water, roads, and jobs.

The site access is dangerous. There's potential toxic materials in the soil. Building it there will be a recipe for disaster for the neighborhood and especially for the occupants of this proposed project.

When MidPen put in a high density development called Vineyard Place in American Canyon, Napa County in 2009, within the first 18 months of opening, the police responded to the development 250 times related to assault and burglary. That was more than half of the violent crime statistics for the entire town in the same year. High density low income development in rural area with no jobs and infrastructure doesn't work.

The life safety risks are extremely high shall this development is allowed to proceed. As in a natural disaster whether fire or earthquake, we are all going to be trapped. What do we tell our children of this community? That we can't protect them from harm because the SMCO officials disregard consistent warnings since 2015 from countless stakeholders, want to ram this project through.

Camp fire, Sonoma/Napa and Berkeley hills fire where thousands of acres burned and hundreds of lives lost should have taught us and especially you the elected officials about responsible development. Can't put a high density development when there's only 1 way in and out such as the narrow streets and one way Highway 1. We the taxpayers elected you to represent us and do what's right and responsible. It's our tax dollars that you are providing as subsidies to MidPen. We are your constituents and key stakeholders. You need to work with us rather than against us.

The life safety risks are extremely high shall this proposed project is allowed to proceed. Would you, decision makers of the California Coastal Commission, want to be negligent or be involved in potential class action legal suits related to

potential wrongful deaths and the destruction of environment? This letter shall serve as a notice to you that not only do we object, but also that we formally notify you of serious life safety and liability concerns in addition to suitability and compatibility of the existing neighborhood. Bear in mind that this letter is a public document and is discoverable under the FOIA (Freedom of Information Act).

Please take the responsible action to stop this project and find another site that is connected to appropriate infrastructure. As your constituents and local residents, we can help you and let's work cooperatively to find an alternative site/solutions.

Please consider and address the following

## Unaddressed Key Concerns

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a new reality for the coast. **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and earthquake risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, lack of walkability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already

overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable**, guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastside residents for project-specific upgrades.

- **Traffic Impacts are significant and remain unmitigated**

MidPen Housing's application estimates 500 daily new trips will be generated from its proposed project. MidPen Housing's traffic study noted five significant and unavoidable impacts to Highway 1 intersections in Moss Beach. The County and Midpen have downplayed the identified impacts on HWY 1 and neighborhood roads, and defer discussion to the County's Connect the Coastside traffic plan, which is also in process.

- **Connect the Coastside (CTC) traffic plan is being rushed with outdated data**

CTC is being presented by the County in conjunction with MidPen's Cypress Point project. This draft CTC plan is based on outdated traffic data and lacks credible funding sources.

- **Peer Reviews of MidPen's application have been ignored**

Midcoast ECO has engaged the services of experts to peer review MidPen Housing's application. These reports have not been referenced in County at all.

Sincerely,  
David and Patricia Lynn  
Residents and Taxpayers of Montara, CA

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:35 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Richard Gates <silvagates@sbcglobal.net>  
Sent: Friday, March 05, 2021 4:36 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I am writing as a resident of Moss Beach to request that the California Coastal Commission please consider the significant impact to public safety that MidPen's proposed housing development at Farallon Heights (Cypress Point) will create. Carlos Street, which intersects with Coast Highway 1, and would serve as the main entrance and exit for the proposed development, is narrow and offers poor visibility to drivers entering the highway, especially of northbound traffic. It is estimated (conservatively) that the 71-unit development would generate an additional 150-plus resident vehicles to the community. MidPen has estimated that there would be 500 vehicle-trips a day from the development. Traffic consultants retained by MidPen to study the impact of vehicles generated by their proposed development, stated that development's vehicle impact would be "significant and unavoidable". Currently, traffic on Coast Highway 1 along the midcoast is severely congested, sometimes at a standstill. The majority of this traffic is created by people from out of the area visiting the coast. The heavy volume of traffic is no longer limited to the weekends. This proposed project is outsized and will significantly increase traffic, making it more difficult for people to visit the coast, and endangering local residents, especially during an emergency - any emergency.

Respectfully,

Richard Gates  
Moss Beach



**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Monday, March 8, 2021 9:28 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

-----Original Message-----

**From:** Randy Weaver <weaversjanitorial@yahoo.com>  
**Sent:** Friday, March 5, 2021 6:31 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

There are many unaddressed concerns related to health and safety of the community and the lack of infrastructure.

It is not fair for people to not have convenient access to food and be very isolated between two cities which can provide this and other necessary services.

This is an ill conceived plan which causes more problems than it solves.

Randy Weaver  
650-563-9698

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:39 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 21 Agenda Item Friday 14a San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

*Maria Elena Marquez*



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**From:** Curran, Susan <susan.curran@informatica.com>  
**Sent:** Friday, March 05, 2021 1:47 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Curran, Susan <susan.curran@informatica.com>  
**Subject:** Public Comment on March 21 Agenda Item Friday 14a San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

To whom it concerns re:

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**From:** Susan Curran <[susan\\_m\\_curran@yahoo.com](mailto:susan_m_curran@yahoo.com)>  
**Sent:** Friday, March 5, 2021 1:12 PM  
**To:** Curran, Susan <[susan.curran@informatica.com](mailto:susan.curran@informatica.com)>  
**Subject:** Fwd: Reminder! Urgent Update: CA Coastal Commission Meeting to Approve Zoning Amendment for Midpen Housing Project

Cheers! ~S

While I ideologically support affordable housing efforts, this proposed project continues to present significant and unaddressed impacts. This LCP amendment would all but guarantee the developer's project without adequate review, which is never ok, but is unconscionable during a global pandemic! An environmental impact report is ABSOLUTELY ESSENCIAL in this

time of increasing danger of climate change impacts on not only our community but the entire planet. It is time to put community health and safety above inappropriate and dangerous developer profits. The exponential increase in traffic and traffic accidents along Highway 1 during the past year is highly indicative that this project is untenable for this location. Power outages and fire risks along with evacuation corridor limitations makes this location patently absurd for any development.

But at a minimum, the community's ongoing and unaddressed concerns **MUST BE CONSIDERED AND RESOLVED** or **NO GO** on this project:

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable**, guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastside residents for project-specific upgrades.

- **Traffic Impacts are significant and remain unmitigated**

MidPen Housing's application estimates 500 daily new trips will be generated from its proposed project. MidPen Housing's traffic study noted five significant and unavoidable impacts to Highway 1 intersections in Moss Beach. The County and Midpen have downplayed the identified impacts on HWY 1 and neighborhood roads, and defer discussion to the County's Connect the Coastside traffic plan, which is also in process.

- **Connect the Coasts (CTC) traffic plan is being rushed with outdated data**

CTC is being presented by the County in conjunction with MidPen's Cypress Point project. This draft CTC plan is based on outdated traffic data and lacks credible funding sources. Especially the increase in traffic since start of pandemic.

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **EXTREME Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a DEADLY new reality for the coast, along with resultant power outages. Anyone who has experienced trying to leave the Coast during an extended power outage knows it can take 2-3 hours to get from Montara through Pacifica! **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and earthquake risks, as well as flood and landslide risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, dangerous lack of walkability and

access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. It's a completely inappropriate location for low income housing! This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

PLEASE put our Community health and Safety first in considering this inappropriate project!!

Thank you,

Susan Curran

Montara resident

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:43 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** Stephanie Reyes <sreyes.bayarea@gmail.com>  
**Sent:** Friday, March 05, 2021 8:47 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners,

I am writing to express my strong support for the proposed LCP Amendment for the Cypress Point affordable housing project.

This area along the coast suffers from a severe lack of affordable housing. Low-income workers must choose between commuting far distances--which has a negative impact on their quality of life and the environment--or paying more than they can afford for housing. MidPen has a sterling reputation for building and managing high-quality affordable housing. This is the right project for Moss Beach. Please vote yes.

Sincerely,  
Stephanie Reyes,  
2831 Olivares Ln  
San Mateo, CA 94403

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:37 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Tracey Kehir <tiki.kehira@gmail.com>  
Sent: Friday, March 05, 2021 2:57 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hi!

I am strongly requesting you do not approve this LCP Amendment. A lot has changed on the Coastsidesince the early 1980's when this land was approved for housing. The Coastsides is already experiencing an unmanageable influx of traffic just about year round now and all of the existing building plans(Big Wave,RV park at Harbor) are going to cause unsafe gridlock on Highway 1. Have any of you actually visited the Coastsides on a sunny weekend or during a winter season big surf or during pumpkin season or during the mustard blooming season(yes...that is a thing now) or during extreme low tides? The community wants and deserves sustainable growth and representatives that here our voices. Please slow down all of the build outs and allow our infrastructure and precious resources(water,sewer),safety (coastal emergency evacuation plan), catch up to what is already been approved and in the building process. Is it really appropriate to agree to this LCP amendment without addressing all of the concerns brought forth by the local community? All I am asking is for you to be fair and unbiased in your decision and to think about the residents that would housed in an isolated area without health services, reliable public transportation, grocery stores,etc. unless they own a vehicle. Thank you, Tracey Kehir Moss Beach resident

Sent from my iPad

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:42 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: please vote against the zoning change for the incomplete MidPen proposal in Moss Beach - dangerous access from SR-1, former military base, isolated location experiencing erosion

*Maria Elena Marquez*



**From:** Theresa McLaughlin <theresamcl.625@gmail.com>  
**Sent:** Friday, March 05, 2021 7:20 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Don Horsley <DHorsley@smcgov.org>  
**Subject:** please vote against the zoning change for the incomplete MidPen proposal in Moss Beach - dangerous access from SR-1, former military base, isolated location experiencing erosion

When I first heard of plans to build medium-to-high density housing on the north end of Moss Beach I was surprised but excited to learn about the planned development, fully expecting to be a supporter of much needed affordable housing. It pains me that I must implore you to vote against this badly flawed project for the sake of current and future residents and visitors.

**The MidPen project access from SR-1 at Carlos Street is a dangerous blind curve.** There are no plans or funding to improve this intersection. In fact, CalTrans noted that there is no room for a deceleration lane - cars turning right onto Carlos will be stopped on SR-1 when yielding to pedestrians/cyclists. The Coastal Trail, also planned for Carlos St, will increase cross-traffic at this especially dangerous intersection with very poor visibility for cars traveling on SR-1 north.

Many streets in Moss Beach, including Carlos between California Ave and 16th St, are narrow and cars traveling in opposite directions pass each other carefully. For now the streets are walkable/bikeable because car traffic is infrequent and there is little street parking on Carlos. Carlos parallels SR-1 but higher uphill - the different elevations make widening Carlos to support increased car/bicycle/pedestrian traffic unusually expensive.

This area is being impacted by erosion. The Coastal Trail is planned on Carlos St east of SR-1 because the bluffs have already eroded to the private property lines on the west side. West of SR-1 you find access to small beaches limited by steep cliffs, the sewer plant, and the Fitzgerald Marine reserve.



The original zoning, siting affordable housing across from the sewer plant, on a former military base with limited environmental testing, over 5 miles from the nearest supermarket or library and with generally reduced access to publicly funded amenities, was questionable. Further it assumed that SR-1 would be expanded to two lanes in both directions, no longer possible even if funding were available. Now the property also suffers from reduced access to natural coastal amenities due to erosion, which will further limit publicly funded investments nearby.

There is land approved for affordable housing in El Granada and Half Moon Bay, both much more walkable, accessible especially for the disabled, and better protected from coastal erosion. **Concerns about Carlos St were flagged at the initial MidPen meetings with residents in 2016, and their response has been that it is up to CalTrans to fund and fix them - MidPen will build whatever the zoning allows. Please do not approve the zoning change without a plan to address the intersection, an environmental report that covers remediation of the former military installation, and an estimate of the cost to implement and funding sources.**

Thank you for your consideration and service on the Coastal Commission.

Best regards,  
Theresa

Theresa McLaughlin  
670 Stetson St  
Moss Beach, CA

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 5:34 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

*Maria Elena Marquez*



**From:** flickflackmb@aol.com <flickflackmb@aol.com>  
**Sent:** Friday, March 05, 2021 4:24 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

as a resident of Moss Beach for 51 years, am wondering how many of you on the coastal commission have bothered to come and look at the parcel that Mid Pen is proposing to build, a totally out of context 74 ( or thereabouts) units of affordable housing?  
there are no sidewalks from this venue going to the minimal amount of so called 'downtown Moss Beach' which in actuality is as far fetched from being called 'downtown ' as it is for any of you to go to the moon....  
we have one post office, we have a 6 or 8 seat small restaurant next to the post office, a nice SMALL grocery store, a Mexican restaurant, if one can all it that across the highway from the grocery store, and a Chevron gas station.....and narrow streets in the immediate vicinity of the proposed location.

PLEASE DON'T JUST GO BY PLANS THAT HAVE BEEN SUBMITTED WITHOUT GOING AND ASSESSING THE PARCEL WITH YOUR OWN EYES....

THIS PROPOSAL IS TOTALLY, TOTALLY, TOTALLY OUT OF CONTEXT WITH THE HOUSES IN THE IMMEDIATE AREA.

DO NOT JUST RUBBER STAMP THIS PROPOSED GARGANTUAN PROJECT..

Walt von Hauffe  
Moss Beach resident of 51 years.....

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:41 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

*Maria Elena Marquez*



**From:** Pete F <petef2896@gmail.com>  
**Sent:** Thursday, March 04, 2021 8:30 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

Dear California Coastal Commission,

Thank you for the opportunity to provide comments. I'm raising the following concerns about the LCP amendment. MidPen misstates in their application that there is no affordable housing in Moss Beach.

The opposite is true - according to the 2019 US Census Bureau the population of Moss Beach was 3,604. This includes the **Pillar Ridge Manufactured Home Community (South Moss Beach)** which is a dedicated affordable housing site and **contains 227 units with approx. 1000 residents.**

The new and approved **Big Wave Commercial and Housing development (South Moss Beach)** will provide **50 affordable housing units for approx. 50-100 residents.**

The new **Cypress Point Affordable Housing development (North Moss Beach)** will provide housing for **359 new residents at maximum capacity.**

**The Big Wave and Cypress Point developments will add approx. 430 new residents in affordable housing to the already existing 1000 residents in Pillar Ridge.**

In summary, **Moss Beach will have approx. 1430 residents in affordable housing** with a total population of approx. 4030 (3604 according to 2019 US Census Bureau plus 430 new residents). **This translates to approx. 35% of the population in affordable housing in Moss Beach.**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, lack of walkability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

**What is the impact of a relatively high percentage of the population in affordable housing on a small isolated coastal community? What measures will be taken by San Mateo County and the developer to accommodate this significantly above average affordable housing quota (in comparison to other small coastal communities and / or other communities in general)?**

The existing PUD for the Cypress Point location states the following:

**HAS ECONOMIC DIVERSITY AS IMPORTANT FACTOR FOR THE HOUSING TO BLEND INTO THE COMMUNITY — CHANCE OF OWNERSHIP AS WELL**

I'm asking you to reject this out of scale development as planned and to disapprove the LCP amendment in regards to the 100% affordable housing allocation (the existing PUD dedicates 21% for affordable housing).

Thank you for consideration.

Sincerely,

Pete F

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[https://www.hmbreview.com/community/supervisors-issue-ordinance-to-protect-mobile-home-parks/article\\_15466a44-8e21-11e5-bb1e-a7e4f593fde9.html](https://www.hmbreview.com/community/supervisors-issue-ordinance-to-protect-mobile-home-parks/article_15466a44-8e21-11e5-bb1e-a7e4f593fde9.html)

Lisa Ketcham Nov 18, 2015 4:52pm

Just to clarify, the City of Half Moon Bay's two mobile home parks are not covered by the County ordinance. **Pillar Ridge Manufactured Home Community in Moss Beach is already protected by the County's Local Coastal Program which designates it as an affordable housing site** which shall not be demolished or displaced. It was the residents of Pillar Ridge who organized in 2001-2003 to persuade the County Board of Supervisors to pass a mobile home rent control ordinance which has worked out very well for us.

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Thursday, March 4, 2021 10:49 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Mid Pen Cypress Point / LCP - OBJECT

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**From:** Dave Schorr <davesaway2020@gmail.com>  
**Sent:** Wednesday, March 3, 2021 9:30 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Mid Pen Cypress Point / LCP - OBJECT

Dear CCC and staff;

With all due respect to staff, I raise objection to the recommended approval of the LCP amendment for this project.

Staff notes that the amended and proposed project is smaller than would be allowed under the existing/original LCP. However, common sense must allow for the admission that the existing/original LCP was developed long ago, at a time when development and traffic pressures on the Coastsides were not as pronounced and obvious as they plainly are now.

Relying on this procedural interpretation to allow this project to go forward will cause irreparable harm to the Coastsides, and indeed to the very purpose which the CCC devotes itself, that of preservation of and access to the coastal resources for the general population.

It must be well acknowledged that traffic patterns have worsened significantly, with the reality day to day far exceeding the scope of any traffic studies which have been incorporated into this project. With a projected 500 additional vehicle trips per day, this will only worsen the situation locally, impeding access to the coast for others.

Other objections cogently raised by more organized opposition to this project may not specifically be within the purview of the CCC, but must be considered as context. Putting a low income housing development in this location will force its low income residents to drive for any and all services and shopping, and for getting their kids to school, absent bus service from Cabrillo USD. This imposes a financial burden on the residents which would be avoided with more properly locating this development in a more urbanized, better serviced area.

It is also of great concern, and very likely legally actionable, that it appears the CCC is about to approve this project without adequate review of existing studies, and without adequate and required Environmental Impact Review. Leaving concerns to supposedly be handled with a future CDP is simply caving to the desires of the applicant/developer and the County of San Mateo, as we know full well from previous track record that once the CCC greenlights this project, San Mateo County will rubberstamp anything the developer subsequently requests, including a very predictable project creep, with some elements being deemed "required" to "make the project work", even if that increases it from what is proposed today.

I urge the CCC to stand firm for the interests of both coastal access, and local residents.

All other concerns raised by others are incorporated by reference year, including the size and scope of the project, traffic impacts, traffic safety concerns, site safety and hazardous material mitigation issues, and significant increase in VMT due to the location of this proposed residential development as compared with available services and shopping and jobs.

The VMT component could be better addressed, at least in part, if the project were to provide housing for needy coastal residents who are already living and/or working on the coast. But that is not part of the project conditions, so we can be assured that this will not be the case, and the traffic impacts will be as described, significant and unavoidable.

I urge the CCC to reject the applicant's proposed development at this time. Adequate environmental review, proper traffic evaluation using current real-time data, and concerns of the local community must be taken into account if this project is to go forward on a greatly reduced scope and scale.

If you are going to approve this ill conceived project, at least require the developer to separately fund school bus service in perpetuity to reduce twice daily traffic loading on our roads, as a mitigation measure for traffic impacts.

Sincerely,

Dave Schorr  
Half Moon Bay, California

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Thursday, March 4, 2021 6:37 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** David Rokosky <jorokosky@gmail.com>  
**Sent:** Thursday, March 4, 2021 12:18 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Members of the Coastal Commission,  
I am writing in support of the San Mateo County LCP Amendment to approve the Cypress Point Affordable Housing Project in Moss Beach, California.

As a local resident, I am well aware of the longstanding need for affordable housing on the Coastsides. The property in Moss Beach was originally designated as an affordable site in the 1980's. Since initiating development plans, MidPen has faced ongoing opposition despite having meetings with community members to address their concerns and has redesigned the project in response to specific objections. Yet the opposition continues. Those opposed to the project continue to benefit from the services provided by the very people most in need of affordable local housing.

I believe it is time for those of us fortunate enough to own property on the Coastsides to recognize that ongoing objections are just another way of saying, "not in my back yard." Instead, we all should embrace this development, which is one step toward stable housing for the many Coastsides families in need of safe and affordable homes in this community.

Thank you,  
Joanne Rokosky, Resident of El Granada

Sent from [Mail](#) for Windows 10

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Thursday, March 4, 2021 6:38 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Kathy White <further@coastside.net>  
**Sent:** Thursday, March 4, 2021 2:23 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Members,

I have been a homeowner in Montara for over 40 years and have seen many changes on the coast for better and worse. Since the tunnel was opened connecting Pacifica and Montara, we have experienced a significant increase in visitors to our beautiful coast. It is truly a tourist destination mainly because the area is open and accessible, something urban dwellers don't have. Traffic crawls on weekends and on any day the weather is nice.

The Cypress Point project is a good idea in the wrong place. Montara Lighthouse is right across the highway from the proposed development. People come from all over the world to enjoy the access to the ocean views and tidepools. I am very concerned with the additional erosion, runoff and pollution that will flow directly into the ocean from the oversized development. Our community agreed to buy and run our own Montara Water and Sanitary district in the 1970's. We have paid higher monthly bills to have a system that is maintained and reliable. Adding so many new customers will put too much of a strain on our system putting all of the current residents at risk. So why would the Coastal Commission approve a project with no environmental impact report? San Mateo County looks at open space as someplace to move their problems. The Affordable Housing Project in Half Moon Bay has been pretty successful. Families have grown up in those houses and the children have children and nobody ever moves out resulting in miles of new cars parked on the streets. I spoke with someone from Mid Pen concerned about the number of parked cars and the fact that residents will have to drive eight miles to Pacifica or to Half Moon Bay to go to the store, school, Doctor etc. Walking and bike riding is not much of an option because the highway is so dangerous.

I really think that this location is wrong, especially for families. Please review the reports submitted by Midcoast Eco to understand the impacts on our natural environment and safety concerns.

Sincerely,

Kathryn L White  
340 12<sup>th</sup> Street  
Montara, CA 94037  
[further@coastside.net](mailto:further@coastside.net)



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Thursday, March 4, 2021 6:37 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Linda B. Goldstein <lindabgold@coastside.net>  
**Sent:** Thursday, March 4, 2021 12:49 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Members of the Coastal Commission,

I am writing in support of the San Mateo County LCP Amendment to approve the Cypress Point Affordable Housing Project in Moss Beach, California.

As a Coastsides resident, I am aware of the longstanding need for affordable housing locally. The property in Moss Beach was originally designated as an affordable site in the 1980's. Since initiating development plans, MidPen has faced ongoing opposition despite having meetings with community members to address their concerns and has redesigned the project in response to specific objections. Unfortunately, the opposition continues. Those opposed to the project continue to benefit from the services provided by the very people most in need of affordable local housing.

I believe it is time for those of us who are privileged and own property on the Coastsides to recognize that ongoing objections are just another way of saying, "not in my back yard." Instead, we all need to embrace this development, which will provide housing for the many Coastsides families in need of safe and affordable homes.

Thank you,

Linda B. Goldstein, resident of Half Moon Bay

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Friday, March 5, 2021 10:41 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Maria Elena Marquez

-----Original Message-----

From: Mark Hilvert <hilvertm@gmail.com>  
Sent: Thursday, March 04, 2021 7:42 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear CCC,

I am a lifelong Moss Beach resident. I have lived here for 54 years and seen plenty of changes to our small town over the years. I am not against growth in our area, it is inevitable, and this project has significant value if it can provide affordable housing to the local workers in our area. However, I feel this project will not truly help our small town. The project has extremely limited access to any real services or local employment opportunities. The location of the project will require its residents to utilize cars to do anything. Employment, shopping, and school access require a commute. The current state of traffic on HWY 1 ( the only transportation route ) has degraded to a point that "sunny coastal days" can create slow bumper to bumper traffic. The developer has been leaning on historical traffic data that is out of date and does not reflect the state of HWY 1 on the entire coastside. You need to consider the entire Half Moon Bay coastside traffic when looking at the impacts of development just because we only have one way in and one way out. When considering this permit at least make the commitment to studying the traffic impacts at a more current level.

In that same vein of thought, the current infrastructure is significantly burdened. Unfortunately for the developers of this project they are trying to build this project when the systems are "maxed out". These services need to also be studied at a more current level to asses the system's feasibility.

This is a large scale project for our area. All I really am asking for is that entire infrastructure and resources be studied and the information used in those studies be current. Not utilizing, past studies as the sole means for decisions being made.

Mark Hilvert

**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 4:32 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Agenda Item 14 Local Coastal Plans

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**From:** D Gold <dgold184@gmail.com>  
**Sent:** Wednesday, March 3, 2021 3:36 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Agenda Item 14 Local Coastal Plans

Hello,

I am a resident of Pacifica CA and am writing to support the proposal that would allow creation of affordable housing units as part of changes to the local plan. We need much more low income housing on the coast, and I believe that the Coastal Commission should take this action to ensure that coastal communities are not limited to the rich and super-rich. Thank you for your consideration.

D. Gold  
Pacifica CA

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 7:36 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Liz Pearlson <lizanah@sbcglobal.net>  
**Sent:** Wednesday, March 3, 2021 6:09 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** marco constant <sailsmc1@gmail.com>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

To the coastal commission,  
As a resident of Moss Beach, I am deeply concerned about how during a pandemic when there is less community involvement, the cypress point housing project seems to be moving forward, disregarding several red flags that have been professionally uncovered.

To not ask for an environmental impact report at this point is negligent of this commission. After the worst wild fire season in the history of the Coastside to be pushing through this development without further evaluation is careless and dangerous. With one road out of our Coastside , not acknowledging the impossibility of evacuating safely during a wildfire or earthquake is unthinkable.

Why hasn't Midpen responded to Midcoast ECO's peer review by experts? There are some serious concerns regarding traffic, water, hazardous wastes, lead, the list goes on. Shouldn't these reports be take seriously?

The inappropriateness of this location for a large housing development is concerning. There is inadequate public transit, lack of walk ability and no access to stores or jobs.

In the very least there needs to be an Environmental Impact Report done now before this goes any further. Wouldn't that be a good use of time while we get over the pandemic and people can't participate fully in this process?

Sincerely,  
Elizabeth Pearlson, L.Ac  
Moss Beach Resident

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:53 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** George Wikle <gwikle@earthlink.net>  
**Sent:** Wednesday, March 3, 2021 10:39 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners,

We have significant concerns about the proposed Cypress Point LCP Amendment No. LCP-2-SMC-20-0054-1 as follows:

### Unaddressed Key Concerns:

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable,** guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastside residents for project-specific upgrades.

- **Traffic Impacts are significant and remain unmitigated**

MidPen Housing's application estimates 500 daily new trips will be generated from its proposed project. MidPen Housing's traffic study noted five significant and unavoidable impacts to Highway 1 intersections in Moss Beach. The County and Midpen have downplayed the identified impacts on HWY 1 and neighborhood roads, and defer discussion to the County's Connect the Coastside traffic plan, which is also in process.

- **Connect the Coastside (CTC) traffic plan is being rushed with outdated data**

CTC is being presented by the County in conjunction with MidPen's Cypress Point project. This draft CTC plan is based on outdated traffic data and lacks credible funding sources.

- **Peer Reviews of MidPen's application have been ignored**

Midcoast ECO has engaged the services of experts to peer review MidPen Housing's application. These reports have not been referenced in County presentations or documentation. We have submitted them to the CCC for review and public record, but there has been no response. [Click below](#) to read these peer reviews:

- [Traffic](#): Pang Engineers, Inc

- [Hazards, Hazardous Materials and Hydrology](#): SWAPE's Matthew Hagemann

- [Wastewater](#): Civil Engineer Robert W. Emerick, Ph.D., P.E.

- [Biological Resources Assessment](#): Biologist Steve Powell of BioMaAS Inc.

- [Vegetation Assessment](#): Bryan Jessop

- **Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a new reality for the coast. **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and

earthquake risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, lack of walkability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

George and Ellen Wikle  
506 Sierra Street  
Moss Beach, CA 94038

**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 12:10 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** jeff olson <jefdolson@gmail.com>  
**Sent:** Wednesday, March 3, 2021 11:50 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Many of us believe this project is inappropriate in this location. I am a strong believer in building affordable housing, but this one is going to cause terrible and dangerous traffic problems. Affordable housing needs to be near public transit and there is very little in this area. Highway one is already overburden and just crazy, especially on weekends.

Please deny the building of this project or lower the density.

Thank you,  
Jeff Olson



## **Martinez, Erik@Coastal**

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**From:** Judy.Staniotes@nikon.com  
**Sent:** Wednesday, March 3, 2021 2:49 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** Moss Beach Large-Scale Housing Project

Dear Erik Martinez,

re: Moss Beach Large-Scale Housing Project

As residents of Moss Beach for 35 years, we strongly protest the proposed project. The lack of infrastructure alone makes this project not feasible. Moss Beach is not a city, not even a town. Moss Beach is a very small coastal hamlet consisting of a small population. There is no room to increase the population in Moss Beach by such a high percentage! The entrance and exit to this project would be on Carlos Street, which is a narrow road barely able to fit two passing vehicles. Seventy-one units would bring an enormous amount of additional vehicle traffic.

Additionally, in this proposed area, there are very few sidewalks, if any, and even some streets are unpaved dirt roads. MidPen Housing's attempt to push this project through despite all of the scientific evidence of the environmental destruction it will cause is simply wrong.

**We strongly urge you to not allow this project to proceed!**

Thank you,  
James and Judy Staniotes  
Moss Beach, CA

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 12:10 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Leea Henderson <leeaghenderson@yahoo.com>  
**Sent:** Wednesday, March 3, 2021 12:05 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I am very concerned about the Cypress Point Mid Pen. housing project. The coast already has horrible traffic and to add more traffic is concerning. Additionally, the evacuation route is already concerning and to add more traffic is not what the community needs or wants. Please vote against this project.

Leea Henderson

**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 11:04 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: MID COAST ECO - Moss Beach MidPen Housing Project

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**From:** Mark B <mark.brasfield@gmail.com>  
**Sent:** Wednesday, March 3, 2021 10:57 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** MID COAST ECO - Moss Beach MidPen Housing Project

**To the Members of the California Coastal Commission,**

**I was a docent at the Fitzgerald Marine Preserve for several years and my husband and I have a great love and respect for this special area. We have lived in Moss Beach for over 38 years.**

**It has been very depressing for us to see the marine life at the Fitzgerald Marine Preserve being destroyed until now it is probably just 10% of what it used to be. We are nearly past the tipping point of being able to preserve the tide pool ecosystem now. Huge projects like this, which are typical by MidPen, are “not appropriate” for sensitive coastal areas like ours, as outlined in the comments at the end of this email.**

**The Coastal Commission should protect the coast by not approving this boondoggle of a project that will further degrade the fragile marine life at the Fitzgerald Marine Preserve and endanger the lives of the children of the families, who live on the access streets to this MidPen project, like us.**

**Best Moss Beach Regards,**

**Kristan and Mark Brasfield**

**PS - Here are the key points, drafted by our neighborhood committee MID Coast ECO, that show why this project should not be approved by the Coastal Commission.**

- **No current Environmental Impact Report**

This property was part of a World War II top-secret military site that has never been officially assessed

or cleaned up. Neither the County nor MidPen Housing has committed to perform an EIR, despite **documentation of asbestos and high levels of lead on the site.**

- **The Project is too big for the infrastructure**

Adding 71 units with up to 359 new residents at maximum capacity will be a major burden on the infrastructure. Highway 1 and our Midcoast sewer and water infrastructure are already overburdened and at risk from rising seas. **MidPen should reduce the size of the project to what's sustainable**, guided by a true assessment of today's challenges with infrastructure and traffic, and the significant costs to coastside residents for project-specific upgrades.

- **Peer Reviews of MidPen's application have been ignored**

Midcoast ECO has engaged the services of experts to peer review MidPen Housing's application. These reports have not been referenced in County presentations or documentation. We have submitted them to the CCC for review and public record, but there has been no response. [Click below](#) to read these peer reviews:

- [Traffic](#): Pang Engineers, Inc
- [Hazards, Hazardous Materials and Hydrology](#): SWAPE's Matthew Hagemann
- [Wastewater](#): Civil Engineer Robert W. Emerick, Ph.D., P.E.
- [Biological Resources Assessment](#): Biologist Steve Powell of BioMaAS Inc.
- [Vegetation Assessment](#): Bryan Jessop

- **Threat to coastal evacuation**

Our coast has just one road in, through, and out with no alternate routes. Extreme and elevated wildfire risk is a new reality for the coast. **Neither the County nor MidPen Housing have adequately addressed evacuation concerns** and they use outdated maps to assess fire and earthquake risks.

- **Inappropriate / Isolated Location**

Moss Beach is isolated, located five to seven miles in either direction from the nearest town centers of Pacifica and Half Moon Bay. There is inadequate public transportation, lack of walk-ability and access to groceries, doctors, jobs, schools, pharmacies, and community-oriented services. This project would also reduce the Level of Service (LOS) at several HWY1 intersections and likely increase the Vehicle Miles Traveled (VMT) for residents.

- **Traffic Impacts are significant and remain unmitigated**

MidPen Housing's application estimates 500 daily new trips will be generated from its proposed project. MidPen Housing's traffic study noted five significant and unavoidable impacts to Highway 1 intersections in Moss Beach. The County and MidPen have downplayed the identified impacts on HWY 1 and neighborhood roads, and defer discussion to the County's Connect the Coastside traffic plan, which is also in process.

- **Connect the Coastside (CTC) traffic plan is being rushed with outdated data**

CTC is being presented by the County in conjunction with MidPen's Cypress Point project. This draft CTC plan is based on outdated traffic data and lacks credible funding sources.

**Note about our family: We have lived on Sierra St in Moss Beach for over 38 years and raised our 3 children here. There is no local shopping, jobs, county services or other support structure for this project. Also, we have seen the endangered San Francisco Garter Snake on the proposed site in prior years.**

**Please help us protect the Fitzgerald Marine Preserve by not approving this project.**

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LAW OFFICES OF  
**EPSTEIN & FRIEDMAN LLP**

2025 CARLOS STREET  
MOSS BEACH, CA 94038

TELEPHONE (650) 728-5040  
FACSIMILE (650) 728-8318  
MLEPSTEIN@MSN.COM

March 3, 2021

Sent by email to : [NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)

**Re: MidPen Cypress Point Project**

Dear Ladies and Gentlemen:

I have been a resident of Moss Beach since 1982 and I have seen the developments on the mid-coast first hand. I also live on Carlos Street, less than 100 yards from the proposed Cypress Point project. Any independent observer would conclude that the proposed high-density project at the top of Carlos Street is not consistent or compatible with the surrounding community.

I 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, who almost unanimously oppose this project; 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 for housing.

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, pharmacies, 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 street which is absolutely inadequate now, before the addition of another 200 car trips twice a day. Or, you could try to enter Highway 1 going *north* on Carlos Street from the project where you will experience another blind curve that hides 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 respectfully urge you to *require* an environmental impact report that addresses these issues before allowing the development of this project.

Very truly yours,

Mark L. Epstein

MLE

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Thursday, March 4, 2021 10:50 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Maria Real <sitara7.mr@gmail.com>  
**Sent:** Wednesday, March 3, 2021 9:47 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

To all that this concerns,

As a resident adjacent to this proposed project I urge you to do your job to the fullest. This includes reviewing all reports concerning this development and ensuring that all impact studies are done thoroughly. Cutting any corners in this matter would be unethical especially considering this was once a military site that borders a creek our children play in. We have lived in this neighborhood for 18yrs and can't begin to imagine the impact an additional 77 families will have on our little street. Moss Beach is a very isolated town that cannot support such a sudden increase in population. We have few jobs with little turn over, and have always lacked adequate public transportation. It makes no sense to put low income families where there are no jobs, poor transportation, no support services. We have expensive water rates that are destined to increase, electricity that goes out often, and roads that cannot handle evacuations as it is. This is a real threat to our community if you have ever been to the coast on the weekend you would experience the two hour traffic to get off the coast. This is only getting worse with the current housing developments and will be unbearable with the new giant community complex that is being built on highway 1 in El Granada. Yes, literally across the highway from the beach. The roadways cannot handle these increases in transportation. Living here has been a blessing but that is quickly turning into the traffic experience of driving on the bay bridge at work hours.

I implore you to give this development serious thought and consider the concerns of families that have lived here for many,many years.

Maira Real

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 12:10 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Pierceall, Rich (NBCUniversal) <Rich.Pierceall@nbcuni.com>  
**Sent:** Wednesday, March 3, 2021 11:50 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Ladies and Gentlemen:

Being a long-time resident of the area one block from the proposed MidPen project, I want to voice my concerns over the scope of the residential project being considered. I have read the reports, as well as the reports from independent experts and think this is totally inappropriate for the location that I am very familiar with.

Please consider additional resources and experts beyond the current scope of findings before this project is green-lit. There is too much potential negative impact for this to be considered without further study.

Sincerely,

Rich Pierceall, Veronica Ciari  
587 Sierra Street  
Moss Beach, CA 94038  
650.219.5413



## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 4:31 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Suzanne Moore <suzygettu2@gmail.com>  
**Sent:** Wednesday, March 3, 2021 3:06 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Coastal Commissioners,

I am a Pacifica homeowner and sitting board member for Healthcare for the Homeless and Farmworkers Program writing to you as a coastal resident. I seek your support for Cypress Point in Moss Beach. Affordable housing on the Coast was difficult before the pandemic, but COVID has created a desperate situation - especially for those of low income, essential low-wage workers, and people of color. I am so grateful that Mid Pen is petitioning the Commission to move forward with Cypress Point.

If the Coast is to have an equitable recovery from the pandemic, we need to have housing for those of low income. I understand concerns of local residents, but I implore you to do what is right and proceed with this project. Thank you.

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 1:13 PM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Ted Morton <theodoremorton@gmail.com>  
**Sent:** Wednesday, March 3, 2021 1:11 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

To Whom It May Concern,  
We are Moss Beach residents. My wife and I have called the area home for the past 30 years. We have owned our home in Moss Beach for 22 years.

We are very concerned about the proposed MidPen housing project. The arguments against it have been clearly communicated, but the county seems to ignore us.

Pushing forward a project of such magnitude without a proper environmental report from every possible angle is ludicrous. This project smells of nothing but detrimental impact, greed, and governmental quota procurement. A decent environmental report would demonstrate quite clearly that this project is a very bad idea.

Respectfully,  
Ted & Caroline Morton  
707 Sierra Street  
Moss Beach, CA 94038

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:51 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

-----Original Message-----

From: Carolyn Jaramillo <cderby37@icloud.com>  
Sent: Tuesday, March 2, 2021 6:01 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear Commissioners,

I am writing to express my support for the approval of the Cypress Point Affordable Housing Project. Affordable housing for people of low income and very low income is so essential to health and well being of our larger coastal community. People working in this region at ordinary jobs, which service all of us, will be able to afford to live here.

It is a real joy to think that workers making less than 80% of the median income will be able to afford housing. It is the right and just action to take to make this possible.

Thank you for your consideration.

Carolyn Jaramillo  
Pacifica Home owner  
524 Manor Dr.

Sent from my iPad

To: The CA Coastal Commissioners

455 Market Street, Suite 300

San Francisco, CA 94105

Tuesday, March 2<sup>nd</sup>, 2021

REGARDING: SAN MATEO COUNTY LCP AMMENDMENT # **LCP-2-SMC-20-0054-1**

(CYPRESS POINT PUD)

Dear Commissioners,

I am in support of downzoning this parcel from the allowable 148 units to 71. While there is a need for affordable housing on the MidCoast, this location is ill-suited for the proposed future residents due to the necessity to get to work in a private vehicle. Some of the planned 71 units are three or two bedrooms, and as my attached Satellite image shows of the Moon Ridge Apartments in Half Moon Bay, Mid Pen Housing never seems to provide ample on-site parking for their residents. Plus, when parking is not included in the rent, anyone desiring to park on-site will be required to pay extra due to the MidPen plan to “**un-bundle**” the parking to “**encourage**” the use of public transit. (Note the image of the Moonridge Apartments in Half Moon Bay with many of the cars are parked outside the perimeter of the complex - which are open fields.) However, this Moss Beach project will not provide enough parking for the planned number of bedrooms, and therefore “Overflow” parking will either spill-over into the adjacent neighborhood of single-family homes, causing potential neighborhood disputes, or out onto the shoulders of Highway One, or even down into the commercial area of the village of Moss Beach, a 12 minute up-hill walk in the dark, after working all day.

**In most Cities, affordable housing is built close to public transit AND jobs, but not only is the unincorporated MidCoast a car-dependent community, but on weekends the residents who live here are trapped in their homes, due to the influx of visitor traffic. MidPen residents who work on weekends will battle traffic to get to & from their jobs.**

Furthermore, there are **no school buses** to and from the Middle School or High School 7 miles away (14 miles round trip) located in Half Moon Bay. Additionally, there currently are **no safe routes to the elementary school**, located to the north, in Montara at 1100 Le Conte Ave., for a younger student to walk (25 minutes on foot) or bike the 1.2 miles one-way, because the shoulders of Highway One have no separate, designated bicycle paths, and only very narrow shoulders for a dirt walking path. **Most local children are driven to school by parents, which causes yet more traffic and a burden on working couples.**

This site is better suited as a **senior complex**, since many seniors do not still commute to work, or have large families living with them, therefore lack of school bus service would be less of an issue. The nearest major grocery stores are 7 miles either way, North to Pacifica or South, to Half Moon Bay (besides the Coastsides Market, a liquor/convenience store in Moss Beach, that carries some food items). The Coastsides lacks a Hospital, although Seton Coastsides, a convalescent facility, has a small emergency room. There are multiple traffic chokepoints on Highway One should an **emergency evacuation**, as in last year’s fires, be necessary. San Mateo County’s Comprehensive Traffic Management Plan is now **under review** but **un-funded**, but has no evacuation plan, nor did the City of Half Moon Bay include any in their recently completed Land Use Update. It seems that everybody is just **kicking the “TRAFFIC CAN” down the road.**

Our MidCoast Community lacks a Community Center for after-school activities or a Senior Center. The nearest Parks and Recreation Facility is 7 miles South in Half Moon Bay, which is **gridlock central**, therefore putting yet more burden on parents to ferry kids 14 miles round trip in traffic, for activities or a library visit. Therefore, due to traffic concerns and the inconvenient location, most Coastsiders do not avail themselves of those facilities often, if at all.

As for the **inadequate on-site parking**, especially considering that owning a car is a “must” to efficiently get around from this location, I truly feel that MidPen should be **mandated** to provide **adequate on-site** parking, at no extra cost to its residents, which could easily be two parking spots per bedroom. Consider that an adult couple with a family might need

three parking spots for a 3-bedroom unit, if one child drives, while both the one- and two-bedroom units might also have the need for at least two parking spots. That would be a total of more than the planned 142 on-site spots.

**Current plans call for :**

16 - 1 BEDROOM UNITS (INCLUDING 1 DESIGNATED AS ADA) AND 1 FOR THE RESIDENT MANAGER (Potentially **32 drivers** if 2 adult drivers share a single bedroom Unit)

38 - 2 BEDROOM UNITS (INCLUDING 2 DESIGNATED AS ADA) (Potentially up to **76 drivers** if 2 driving adults reside in each bedroom)

18 - 3 BEDROOM TOWNHOUSES (INCLUDING 2 – DESIGNATED AS ADA) (Potentially up to **108 drivers** if 2 drivers per bedroom)

**\*\* 71 TOTAL UNITS (146 bedrooms) ON MORE THAN 10 ACRES, THERE IS AMPLE VACANT LAND FOR MORE PLANNED PARKING. \*\***

ALLOWING FOR 142 TOTAL PARKING SPOTS (with a potential occupancy of 216 car-owning adults, if most units are occupied by working couples who must drive to get to work on time.)

**Example:** A three-bedroom apartment where likely two adults need cars to get to work, and possibly one or two driving-age teenagers also live there, there would need to be a minimum of 3-4 parking spots for the 3-bedroom units. If the one-bedroom units only are only allocated 1 dedicated parking spot, and two drivers live there, that creates a need that is not being planned for. Likewise, in the two-bedroom units if two driving-aged adults each share a bedroom that could create a need for up to 4 parking spots for each 2-bedroom unit.

**Where** will the extra approximate **75 “overflow”** cars park? The nearest parking lot is at the Mormon Church on California St. & Hwy. 1, which can accommodate 164 regular cars plus some handicap designated spots, but it is both private property and a bit of a walk, (.6 miles or 12 minutes uphill, and it is across Highway One from the Coastside Market. (Map attached) Also, there is **only one streetlight** on Highway One, so visibility is greatly reduced at night.

My analysis is being stressed here, so that the “POWERS” that approve this will be considerate of the future residents, and so that Mid Pen will be mandated to plan for adequate on-site parking, in the beginning, not eventually, considering the lack of adequate public transit, the likely distance to their jobs, the remoteness of the location to shopping, recreation, schools and healthcare and the need for the project to be affordable to the future occupants. Should MidPen be allowed to “get by” with only providing the 142 parking spots for a 146-bedroom project, I predict that will create an extra burden for MidPen future residents in this car-dependent location, who then must jockey each night, to locate off-site parking and also burden those residents who own homes near the site, who will suddenly be forced to deal with the over-flow parking on narrow, and some unpaved streets in front of their homes. I think it is inconsiderate that MidPen Housing might charge extra for parking on site or force the extra cars to park “off campus” and “hike in” in our dark, foggy, and often windy coastal conditions. It is estimated that this project will create 500 trips per day but, it could be even more without school buses and many driving-aged adult residents who need to get to work efficiently. It is my desire to see ample permeable parking created onsite from the get-go, and a minimum of one EV Charging station per building. I can NOT over-state the remoteness of the project, or the gridlock drivers will face as traffic worsens.

Note attached images from Google Satellite Maps.

SINCERELY,

Carlyle Ann Young

180 San Lucas Avenue

Moss Beach, CA 94038

[cid4houses@gmail.com](mailto:cid4houses@gmail.com)

650-728-9271

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

-----Original Message-----

From: dennis shapses <dennis.shapses@gmail.com>  
Sent: Tuesday, March 2, 2021 9:48 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

My properties are located on 16th street, (297 16th street and 300 sixteenth St. It is very dangerous making a right turn or left onto HWY 1 from 16th street due to the curvature of hwy 1 at that intersection.

This property is significantly higher than ours, and run off of water from this property could significantly increase slippage ( as tons of concrete will replace the natural flow of water dissipating into the ground) this issue has not been addressed.

In addition the project shares a border with our ranch as we rescue wild mustangs and are extremely concerned that children from this project will cross over to our property and get hurt by a wild untamed mustang. These are serious concerns which have not been addressed fully by mid pen.

Sincerely,

Dennis and Sylver Shapses

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)  
**Date:** Tuesday, March 2, 2021 4:03:04 PM

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**Maria Elena Marquez**



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**From:** Frank Noto <Frank@fnstrategy.com>  
**Sent:** Tuesday, March 02, 2021 2:38 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

I strongly support the creation of affordable housing on the coast, and this project helps. Supporting changes to the Local Coastal Program is crucial to that goal.

Many families with low-income and moderate-incomes find it difficult to afford homes, making for long commutes and overcrowding.

Frank Noto

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## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Julz <julian@coastside.net>  
**Sent:** Tuesday, March 2, 2021 7:32 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Cc:** Maria Real <sitara7.mr@gmail.com>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Good day.

I am extremely concerned that your noble organization will not be looking at this rushed inappropriate proposed project with the thoughtful consideration it requires-

I would ask, have any of your staff or governing body visited our one lane in one lane out town during nice weather or a weekend?

An evacuation would be impossible- and SMC has NO evacuation plan. I am a volunteer first responder & the joke of a plan they are 'simulating' is not funny at all - frankly it's criminal.

Moss Beach also has 227 units of low income housing (Pillar Ridge) that is a royal mess, smack dab in a Tsunami zone.

The overflow of cars onto surrounding streets has always been a problem.

I am good friends with a few long time residents of Pillar Ridge and they agree that the location is not ideal for getting to work.

This last past few years the influx of traffic / people has been unbearable. We have lived here 17 years now and due to apps such as Waze or even google maps people get rerouted down residential streets (90% have no sidewalks) driving over 30 miles an hour.

Just a few months ago it took our neighbors over an hour to travel 8 miles to get children's Tylenol for their child.

Speaking of children- Moss Beach has 1 basketball hoop, no soccer, baseball, tennis, swimming pool, skate park - the children from 8 to 18 have nothing to do locally. Yet the purposed development claims to be family based.

All intelligently planned housing developments are placed in or near urban centers where work exists and other types of support services are. There are a total of maybe 20 jobs in Moss Beach. (All taken with very little turnover) The reason this project is attempting to be pushed through without proper review is because of it's old outdated zoning status- it would allow the team of SMC & mid plen to not have to do important work / honest research that would expose the extreme flaws and shortsightedness in this purposed project.

Please, please just look at the facts - this delicate area can't even handle the 2% growth that has been happening-



A few months of objective review and comparisons would be the only appropriate action  
I'm sure you have read but in case you have not .....

<https://midcoasteco.us12.list-manage.com/track/click?u=edbf90919b7ad45df3149d938&id=a9f6d1bc54&e=85bfb4eeb8>

Thank you for your time and service

Sincerely and truthfully  
Julian & family

## **Martinez, Erik@Coastal**

---

**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Jonathan Dixon <jdixon\_67@yahoo.com>  
**Sent:** Tuesday, March 2, 2021 7:30 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

How dare you people try to fast track the mid-pen housing development in force it on the residents who are paying the property taxes on the coastside. This is clearly a terrible place for development of this size, will cause massive problems for current residents. Our infrastructure is simply insufficient, and it's an awful place for this type of development. Honestly it's crazy, and please know that many of us residents will hold horsely and the other proponentselse accountable if you continue to push this down our throats.

Jonathan Dixon

## **Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Joan Dower <pacifica\_joan@yahoo.com>  
**Sent:** Wednesday, March 3, 2021 10:18 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

This is a letter to support the Cypress Point Affordable Housing Project in Moss Beach. The needs are so great.

Thank you

Joan Dower-Wilson  
334 San Pablo Terrace  
Pacifica, Ca. 94044

[Sent from Yahoo Mail on Android](#)

**Martinez, Erik@Coastal**

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

-----Original Message-----

From: ravn miller <ravnmontara@yahoo.com>  
Sent: Wednesday, March 3, 2021 10:14 AM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

I support the Midcoast ECO concerns about the Cypress Point Zoning. The project is too big for infrastructure here, traffic issues need to be addressed, peer reviews have been ignored, it will stress water, sewer and habitat. An environmental study needs further study. I oppose approving this now

## Martinez, Erik@Coastal

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**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

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**From:** Rohan Thakur <raethakur@gmail.com>  
**Sent:** Tuesday, March 2, 2021 7:46 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

The risk to human life due to inadequate earthquake evacuation planning, especially using outdated coastal traffic planning data is borderline negligent. This blatant disregard to the safety of these future occupants needs to be addressed. Poor planning and ignoring inconvenient facts seems to be endemic on this project. Sad to see this happen.-

-

Rohan  
650-823-1970  
[raethakur@gmail.com](mailto:raethakur@gmail.com)  
<http://www.linkedin.com/pub/9/aa8/35>

## **Martinez, Erik@Coastal**

---

**From:** NorthCentralCoast@Coastal  
**Sent:** Wednesday, March 3, 2021 10:52 AM  
**To:** Martinez, Erik@Coastal  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

-----Original Message-----

From: Todd Enders <toddenders@hotmail.com>  
Sent: Tuesday, March 2, 2021 6:54 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

We need an environmental impact statement for this poorly located oversized development. Who knows what lead, cadmium, and hydrocarbons are located on this former military base? And how will this many people evacuate in the next disaster?

Why are we putting 300+ Lower income residents at a place with no viable public transit and no jobs? Do you want to guarantee the cycle of poverty? Why not put this development in town, where there are jobs?

This is the worst sort of corruption. Using taxpayer dollars to support developers doing something against the interests of the people.

Todd Enders  
Moss Beach

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Monday, March 1, 2021 4:14:31 PM

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**From:** Jan Stokley <[jan@housingchoices.org](mailto:jan@housingchoices.org)>  
**Sent:** Sunday, February 28, 2021 10:47 AM  
**To:** NorthCentralCoast@Coastal <[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear California Coastal Commission,

I urge your approval of Item 14a on the March 12th agenda, MidPen's Cypress Point application. I support Cypress Point because it is an environmentally sensitive effort to create much needed affordable housing for working families on a Coastsidesite that was originally zoned for higher density.

I am a 20 year resident of El Granada and have watched with dismay as the cost of a rental apartment on the Coastsides of San Mateo County has inexorably climbed to more than \$3,000/month. It's not unusual to see a rental listed at \$5,000/month. With home purchase prices above \$1 million, we have become a community that is unable to house the working families on whom all of us depend. None of my three adult children can afford the cost of housing here where they grew up and have strong ties.

It's vital to the Coastsides' environmental sustainability and its social identity that we plan for the development of housing for all income levels. In the many community meetings about this project up to now, I have listened respectfully as MidPen attempted to make changes to satisfy the band of older white homeowners who have turned out to kill the project under the banner of "Resist Density". This organization has recently re-branded itself with an environmental name (Midcoast ECO), but no amount of environmental window-dressing can disguise an ugly, polarizing effort to organize older white homeowners to exclude low- and moderate-income working families (who are majority people of color) from having a home at Cypress Point.

I strongly urge your vote in favor of Mid-Pen's Cypress Point application because it proposes a well-designed, reduced-density use of the site with extraordinary attention to environmental factors, while addressing a critical need for housing equity and inclusion. Let's all work together to plan for housing that will create a more inclusive Coastsides community.

Thank you.  
Jan Stokley  
Resident of El Granada

--

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Monday, March 1, 2021 4:14:55 PM

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**From:** Milo Trauss <milotrauss@gmail.com>  
**Sent:** Monday, March 1, 2021 1:50 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I am emailing to urge the necessary steps be taken to enable the approval of Midpen's Cypress Point housing proposal.

Affordable housing is urgently needed and this proposal delivers on the need. Half Moon Bay has gone decades without building housing in this magnitude; projects like this are long over due. The site is safe and close to bus lines and grocery stores.

If this opportunity is squandered it will only mean longer commutes and further environmental degradation from workers having to travel greater distances from homes built further into the exurbs.

Please support these homes.

Thank you,  
Milo Trauss

*Milo Trauss*  
[milotrauss@gmail.com](mailto:milotrauss@gmail.com)



**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 12, Agenda item 14a, zoning change for affordable housing  
**Date:** Friday, February 26, 2021 3:26:14 PM

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**From:** Carol Steinfeld <carol@carol-steinfeld.com>  
**Sent:** Thursday, February 25, 2021 12:37 PM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 12, Agenda item 14a, zoning change for affordable housing

Commissioners:

If you change the density allowed on this Moss Beach site to allow an an affordable housing development, please require:

1. 100% local preference: Traffic on Route 1 and the connecting roads is often very heavy and bottlenecked, so residents should not be adding to that by commuting to other cities.
2. Model best coastal-development practices, such as green infrastructure, water reuse, ultra conservation (insulation, water conservation, etc.), sustainable landscaping (xeriscaping and no need for gas-powered equipment), and perhaps energy and water microgrid
3. Consideration for de-construction should Route 1 be moved inland (since the road is crumbling there).

Thank you.  
Carol Steinfeld  
One San Mateo

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Friday, February 26, 2021 3:25:28 PM

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**From:** Cornejo, Don <dcornejo@ggrc.org>  
**Sent:** Thursday, February 25, 2021 11:13 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello Commissioners,

Please approve changes to the local coastal program.

The reason why is that MidPen's design for Cypress point meets the needs of such a wide ranch of people in a very thoughtful creative way. Developments such as this add to the fabric of the local community and region.

In my work I help develop and maintain support services for people who have very severe developmental disabilities throughout San Mateo County. These are among the most vulnerable people in our community. They, their families and the direct care staff who support them are essential members of this community. They deserve the support of your commission.

Sincerely,

Don Cornejo  
Supported Living Specialist  
Golden Gate Regional Center  
(415) 832-5724 messages  
(415) 359-7647 direct

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**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Friday, February 26, 2021 3:25:11 PM

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**From:** Joanne Wong-Lam <jwonglam@gmail.com>  
**Sent:** Thursday, February 25, 2021 11:04 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Dear California Coastal Commission Members:

I am writing in support of the proposed affordable homes by Midpen at Cypress Point. I am a property owner in Half Moon Bay and know first hand of the dire need for affordable housing in the area.

I am in support of the changes to the Local Coastal Program to "designate an 11-acre parcel at the corner of Carlos and Sierra Streets in the unincorporated Moss Beach area of San Mateo County from "PUD-124/CD" to "PUD-140/CD", reducing density from medium high to medium, and to provide regulations for the potential future development of a 100% affordable housing project at the site."

Thank you for your consideration of this worthy project that will positively impact so many families and the community of Moss Beach/Half Moon Bay coastal area.

Best regards,

Joanne Wong-Lam  
Property Owner of 160 San Mateo Road, Half Moon Bay

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Friday, February 26, 2021 5:06:04 PM

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-----Original Message-----

From: Marya Ouro-Gbeleou <marya9@gmail.com>  
Sent: Friday, February 26, 2021 4:51 PM  
To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
Subject: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )

Hello,

I am a community center supervisor in San Mateo County and I have seen first hand from my experience here how important housing and affordable housing is to the community. MidPen has created many wonderful affordable housing developments with meaningful support services in our county and I have seen the truly beautiful work they do daily to get their residents to self-sufficiency. They are engaged and responsive to the local community needs and honor and respect their residents. I have also experienced the real struggle of finding housing for a family with young children in this area and it is very difficult to find anything and impossible to find anything affordable. Please do your part to take steps toward a more livable area that can be welcoming to all.

Thank you,

Marya Ouro-Gbeleou

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)  
**Date:** Friday, February 26, 2021 3:25:19 PM

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**From:** Robert <rfruchtose@gmail.com>  
**Sent:** Thursday, February 25, 2021 11:11 AM  
**To:** NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>  
**Subject:** Public Comment on March 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

California Coastal Commission:

The Bay Area has a desperate need for affordable housing. As a resident in the region, I firmly support Midpen's Cypress Point project, and I support the changes to the Local Coastal Program. This item will create 71 affordable homes for those in need.

Sincerely,  
Robert Fruchtman

**From:** [NorthCentralCoast@Coastal](mailto:NorthCentralCoast@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez_Erik@Coastal)  
**Subject:** FW: San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)  
**Date:** Friday, February 26, 2021 3:25:52 PM

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**From:** Robert Whitehair <[robert@sustainablesanmateo.org](mailto:robert@sustainablesanmateo.org)>  
**Sent:** Thursday, February 25, 2021 12:01 PM  
**To:** NorthCentralCoast@Coastal <[NorthCentralCoast@coastal.ca.gov](mailto:NorthCentralCoast@coastal.ca.gov)>  
**Cc:** Alexander Melendrez <[amelendrez@hlcsmc.org](mailto:amelendrez@hlcsmc.org)>; [cgroom@smcgov.org](mailto:cgroom@smcgov.org)  
**Subject:** San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project)

Honorable Chair Steve Padilla and Honorable Commissioners

I am emailing you today to urge you to act on LCP-12-SMC-20-0054-1, allowing the construction of 71 desperately needed affordable housing units in San Mateo County - **Cypress Point.**

Affordable housing is desperately needed in this county. Under the Regional Housing Needs Allocation (RHNA) requirements, builders in my county have constructed far too few homes. For example, In the first 5 years (with just 3 to go) of the current RHNA cycle, only 23% of the needed very low income homes have been built in San Mateo County. Only 43% of the needed low income housing have been built.

Instead of providing homes for our construction workers and farm workers, and for our service industry, we torture them by forcing long, dangerous, unhealthy and tiring commutes just to find jobs here.

We can do better!

Please do what is needed to allow 71 more desperately needed housing units to be constructed.

Thank you

Robert Whitehair  
San Mateo

**From:** [Marquez, Maria Elena@Coastal](mailto:Marquez.MariaElena@Coastal)  
**To:** [Martinez, Erik@Coastal](mailto:Martinez.Erik@Coastal)  
**Subject:** Public Comment on MMarch 2021 Agenda Item Friday 14a - San Mateo County LCP Amendment No. LCP-2-SMC-20-0054-1 (Cypress Point Affordable Housing Project )  
**Date:** Friday, February 26, 2021 3:35:27 PM

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Hi Erik

Este email esta completo en el NCC inbox. (Zoe Siegel <[zsiegel@greenbelt.org](mailto:zsiegel@greenbelt.org)> Fri 2/26/2021 11:27 AM)

Dear Chair Padilla, Vice Chair Brownsey, and the California Coastal Commission,

I would like to urge you to approve the zoning changes for Cypress Point Family community development. Given the pace of climate change we must pick up the pace of our housing development, especially the affordable housing development and in places like this that are zoned for infill housing and not in a climate risk area, we need to approve them in an expedited manner.

The 71-unit development will bring much needed affordable housing to the Midcoast region and the developer has worked closely with the community to come up with a design and density that fits into the existing community. This site is zoned infill and this is the perfect type of infill housing for a region that desperately needs affordable housing.

Residents who live here will be able to shorten their commutes to their job. We need to work to eliminate the “super commute” and make sure that everyone can afford to live near where they work. The design of this project has prioritized the protection of open space and encourages public interaction through a public walking path.

This is the kind of climate-smart development that we need in the Bay Area to meet our housing goals, reduce greenhouse gas emissions, and make sure that local residents are able to grow and thrive in their own communities. In closing, the development of the Cypress Point Family community is another smart step for Moss Beach to ensure the creation of homes and vibrant communities near jobs, retail, and transit. I hope its approval will inspire communities around the Bay Area to redouble their efforts to grow smartly.

Sincerely,

Zoe Siegel  
Director of Climate Resilience, Greenbelt Alliance

**CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT OFFICE  
45 FREMONT STREET, SUITE 2000  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5260  
FAX: (415) 904-5400  
WEB: WWW.COASTAL.CA.GOV

**October 1, 2018**

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

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

Dear Mr. Schaller,

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

[https://documents.coastal.ca.gov/assets/la/TipsLCPAmend\\_Nov2013.pdf](https://documents.coastal.ca.gov/assets/la/TipsLCPAmend_Nov2013.pdf) The County's LCP amendment submittal must include:

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

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



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

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

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

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

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

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

#### **Traffic and Public Access**

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

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

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

### **Transit for Scale of Development**

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

### **Wastewater Treatment Capacity**

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

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

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

Sincerely,

A handwritten signature in cursive script that reads "Renée T. Ananda". The signature is fluid and elegant, with the first and last names being more prominent than the middle initial.

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

**CALIFORNIA COASTAL COMMISSION**

NORTH CENTRAL COAST DISTRICT OFFICE  
45 FREMONT STREET, SUITE 2000  
SAN FRANCISCO, CA 94105  
PHONE: (415) 904-5260  
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**August 3, 2017**

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

**RE: Major Development Pre-Application (Andrew Bielak (MidPen Housing))  
PRE2017-00032 (APN 037-022-070)**

Dear Mr. Schaller,

We received San Mateo County's project referral, dated July 18, 2017 and received in our North Central Coast District office on July 20, 2017, for the above-referenced Major Development pre-application. The proposed project is a new, affordable housing development in Moss Beach located at 1993 Carlos Street. The site is on an approximately 11-acre (10.875-acre) parcel currently zoned as PUD-124. The proposed project is for the construction of a community that includes a total of 71 units (16 1-BR, 37-2BR, and 18 3-BR). This community comprises two-story and one-story structures and dedicated open space and walking trails (as shown on the *Preliminary Site Plan* included with the referral). The proposed project would require a Coastal Development Permit (CDP) and re-zoning. The following are our preliminary comments.

The certified Local Coastal Program (LCP) provides that the purpose of the PUD-124 zoning is specifically to govern the use and development of the subject parcel for a residential complex for affordable and market rate housing. PUD-124 provides an approved Development Plan for the subject parcel. The LCP requires that all development be in conformity with 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. We recommend that the County evaluate the proposed project's consistency with the LCP, as the authorized use of the site is for 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 LCP; and recreational uses for residents of the housing complex as specified by the PUD-124 zoning designation.

We recommend that the proposed project be evaluated for consistency with the requirements for the PUD District, particularly Section 6191 (Review and Findings). LCP Section 6191 for PUDs requires that PUDs not be detrimental to the character and the social and economic stability of an area and its environs. The LCP also requires that PUDs be in harmony with the zoning in any adjoining unincorporated area and that no interference with existing or prospective traffic movements on highways results from the PUD. The PUD must not result in overcrowding of the land or congestion of population. We suggest that the review of the proposed project evaluate its consistency with the required findings provided in LCP Section 6191.

A CDP is required for the proposed project, and as the parcel is zoned Coastal Development ("CD") it must be consistent with LCP Sections 6328.1 and 6328.4, which requires a CDP for development within the Coastal Zone. LCP Section 6328.1 requires that regulations for CD districts be applied in addition to the regulations of the underlying zoning/district, in this case the PUD-124. We suggest that the analysis address the proposed project's consistency with LCP policies for Locating and Planning New Development including LCP Policy 1.19 (Ensure Adequate Public Services and Infrastructure for New Development in Urban Areas), and 1.23 (Timing of New Development). LCP Policy 1.19 requires that no CDP for development in the urban area be approved unless it can be demonstrated that the development will be served with adequate water supplies and wastewater treatment facilities. We recommend that you analyze the proposed project for consistency with the subsections of LCP Policy 1.19 in order to ensure adequacy of a water supply and wastewater treatment for this residential use. LCP Policy 1.23 is to ensure that roads, utilities, schools and other public works facilities and community infrastructure are not overburdened by rapid residential growth. LCP Policy 1.23 also addresses the limits of new dwelling units built in the urban Midcoast. It allows for building permits to be issued for affordable housing even if the number of issued building permits for any given year has reached the 40-unit maximum required by LCP Policy 1.23a. The proposed affordable housing should be reviewed for compliance with LCP Section 6102.48.6, which defines "affordable" ; and LCP Policy 1.23d(1) that requires such affordable housing to have income and cost/rent restrictions for the life of the development. We suggest that the County analysis include a discussion of the proposed project with respect to build-out and consistency with LCP Policy 1.23.

The subject parcel is currently vacant and located immediately adjacent to land (on APN 037-022-280) located northerly of the parcel zoned open space/rural. LCP Policy 1.6 defines rural areas as those lands suitable for different types of land uses, including residential, which are consistent with maintaining open space (as defined in Section 65560 of the Government Code (as of January 1, 1970)) in order to: (1) preserve natural resources, (2) manage the production of resources, (3) provide outdoor recreation, and (4) protect public health and safety. We recommend that the County discuss the proposed project's potential to result in impacts to the adjacent area. The proposed project site should be evaluated to determine what biological resources occur on the parcel, including sensitive habitat. The County analysis should identify potential biological resource impacts and proposed measures to avoid, reduce, and mitigate those impacts.

We recommend that the County evaluate the proposed project's consistency with the policies in the Housing Component of the LCP, including LCP Policies 3.15 and 3.16. LCP Policy 3.15 designates the subject parcel as a potential site for affordable housing; and specifies criteria required in order to develop the subject site for residential use. Development at the subject 11-acre site must assist with meeting LCP housing objectives. The County analysis should include a discussion/review of the proposed project's consistency with the criteria as provided by LCP Policy 3.15. LCP Policy 3.15 specifies the percentage of units to be reserved for low income and moderate income households. LCP Policy 3.16 provides for the phasing of development of LCP-designated housing sites, which includes the subject Moss Beach parcel. This policy limits the number of affordable housing units that can be developed during any 12-month period in order to allow the affordable housing units constructed on LCP-designated housing sites to be

Michael Schaller  
PLN2017-00032 (Bielak, MidPen Housing)  
August 3, 2017

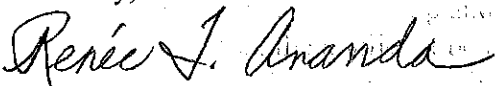
assimilated into the community a few at a time. The proposed project would entail the construction of 71-units. LCP Policy 3.16 provides for the phasing of development of LCP-designated housing sites, which includes the subject Moss Beach parcel, as this policy limits the number of affordable housing units that can be developed during any 12-month period to 60 units. The limit is to allow the affordable housing units constructed on LCP-designated housing sites to be assimilated into the community a few at a time. LCP Policy 3.16, however, allows for increasing the number of affordable housing units permitted if phasing threatens the implementation of affordable housing on an LCP-designated site. We recommend that the review of the proposed project include an analysis and discussion with respect to phasing under the requirements of LCP Policy 3.16a and b.

LCP Policy 3.12 requires that new development providing affordable housing contribute to maintaining a sense of community character by being of compatible scale, size and design. This policy also requires an assessment of negative traffic impacts. LCP Policy 2.52 requires that applicants for new development (except for a single-family dwelling, a second dwelling unit, or a two-family dwelling) in the urban Midcoast that generates any net increase in vehicle trips on Highways 1 and/or 92, to develop and implement a traffic impact analysis and mitigation plan. We recommend that the applicant be required to ensure that the proposed project is in conformity with LCP Policy 2.52. The referral includes a preliminary assessment of traffic impacts, dated June 26, 2017, and prepared by Kittelson and Associates, Inc. Kittelson recommends further coordination with relevant entities regarding mitigation opportunities. We look forward to an opportunity to review the more detailed traffic study, also suggested Kittelson's preliminary assessment.

Finally, because the western portion of the parcel (~1/3 of it) is within a County scenic corridor, we recommend that the analysis of the project address/discuss potential impacts to scenic resources and measures proposed to mitigate those impacts. It should be evaluated for consistency with LCP Policy 8.32 (Regulation of Scenic Corridors in Urban Areas).

Staff is available to answer any additional questions you may have. We look forward to meeting with you, as well, on August 15, 2017 at our North Central Coast District office in San Francisco. Please feel free to call me at 415-904-5292 or contact me via e-mail at [renee.ananda@coastal.ca.gov](mailto:renee.ananda@coastal.ca.gov) if you have questions regarding our comments.

Sincerely,



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