

## Response to County Summary of Public Comments Received on Cypress Point Pre-Application

MidPen Housing (MidPen) submitted a pre-application package for the Cypress Point affordable housing proposal to San Mateo County on June 26, 2017. The County compiled feedback from members of the public in the run to and at a pre-application workshop on September 20, 2017. On November 15, 2017 the County released a summary of the comments in a public document entitled “Summary of Comments and Questions Received at a Public Workshop held on September 20, 2017 regarding a Planned Unit Development Re-Zoning Located on a Vacant Parcel at 1993 Carlos Street in the unincorporated Moss Beach area of San Mateo County.” Per the text of this letter, “it is hoped that these questions/issues can be addressed by the project design or supporting analysis if/when an application is submitted.”

At this point in time, MidPen is submitting a formal request for an amendment to San Mateo County’s Local Coastal Program and General Plan, which are required for the project to proceed. These amendments must be approved by San Mateo County, and in the case of the Local Coastal Program amendment, must be certified by the California Coastal Commission.

The documents that are being submitted for the request include an illustrative site plan and other preliminary design documents as well as a number of environmental and technical reports for the project. Because these documents contain significant technical analysis that was not previously available, MidPen is now providing responses to the pre-application workshop based on most recent information.

Although there is no requirement to respond to the comments received, MidPen is committed to a transparent public outreach process. Many of the questions listed here also encapsulate similar comments provided by various individuals and groups throughout the public outreach process conducted since 2016, before the pre-application was submitted.

Please note that materials currently submitted at this time do not represent an application for a Coastal Development Permit (project-level approval). This submission is solely intended to request approval for an amendment to the LCP and General Plan, which is required for a project-level application to proceed. The Coastal Development Permit cannot be approved until these updates are approved by San Mateo County and certified by the California Coastal Commission, at which point a full project-level review will take place in accordance with County requirements.

Below are responses from MidPen to the questions and comments provided by the County of San Mateo as an official summary of the public workshop. Questions or comments are shown in bold, and MidPen responses are non-bolded.

### 1. Scale (Too Big)

- **The proposed 71-unit housing development seems to be way out of scale for such a small neighborhood.**

The existing zoning designation for the site is medium-high density, or 8.8 to 17.4 units per acre, which would permit between 95 and 189 total housing units on site. The existing PUD for the site, which was approved in 1986, allows for 148 units. MidPen believes this level of development would be out of scale for the existing neighborhood, which is we are proposing to amend the PUD/zoning to allow for a less intense development.

MidPen's proposal of 71 units on the 10.875 site equates to 6.53 homes per acre. This level of development is consistent with the surrounding neighborhood, which is considered medium density, or 6.1 to 8.7 units per acre. Although our proposal to lower the density will require a more extensive approval process than would be necessary if we build a project that matched the existing zoning, we are committed to developing a project that fits within the character of the existing community.

Additionally, by clustering the buildings in the center of the site, we can retain a significant portion of the site for natural undeveloped space and trails that we will open to the public.

## 2. Traffic (Overall Traffic Volume on the Coastside)

- **What mitigation measures will be put in place to address traffic during the construction of this project?**

As with all major construction projects, there will be a construction management plan in place to help address traffic flow and minimize effects on the neighborhood. Fortunately, this site is not located directly on Highway 1 and the set-back from Highway 1 will help mitigate any traffic delays. The site is also a large parcel of land, with the developed area covering just about half the site, which will provide sufficient room to keep construction trucks on-site, minimizing effects on the surrounding community. We work with experienced general contractors who are aware that our goal is to minimize traffic delays as well as maintain motorist and worker safety, traffic flow, and access for local residents. There will be a superintendent on-site during construction hours who will monitor work zone impacts. Section 4.88.360 of the San Mateo County Code of Ordinances establishes allowable hours of construction between 7:00 a.m. and 6:00 p.m. on weekdays and 9:00 a.m. and 5:00 p.m. on Saturdays. We will also meet any San Mateo County requirements for parking and traffic management during construction.

- **Traffic analysis should include entire commute corridor beyond choke points on 92 and Pacifica.**

The full traffic analysis includes ten intersections as identified by County staff, and is not narrowly focused on choke points on 92 and Pacifica. The traffic report also includes analysis of impacts on Route 92, but is focused more specifically on the area closer to the project site, where there would be more direct impacts.

MidPen is working with San Mateo County on establishing a preference for housing to existing local employees and residents, which will help reduce the regional traffic that currently exists from workers commuting in and out of the area.

- **The Highway 1 Safety and Mobility Study was based on Caltrans data from before the opening of the tunnel. This data is 7 years old. Coastside residents frequently**

**speak of the increase of the traffic since the opening of the tunnel. Also, the MidPen project was not considered in the study at the time of its adoption (2012).**

Although we have examined the Highway 1 Safety and Mobility study for background research, this document is not being used as the basis for our analysis. MidPen's traffic study includes up-to-date traffic counts from the past year that reflect current conditions for the area.

- **The crossings as presented in the Cypress Point Preliminary Traffic Assessment do not sufficiently represent the traffic impact of the MidPen project. Nor can either be presented as a future condition that mitigates the impact of the pedestrian and vehicle traffic.**

The assessment submitted with the County pre-application in June 2017 was not intended to be a complete traffic analysis, but an initial study of the conditions and options for improvement at the Carlos Street/Highway 1 intersection. We are not claiming that this report represents a full analysis of the project impacts.

The full traffic impact analysis included in the current submission is a thorough and detailed evaluation of the traffic impacts generated by the proposed project. The analysis includes evaluation of both existing conditions, background conditions (which includes foreseeable projects not yet built), and cumulative conditions (which assumes for traffic growth through 2040), as well as the project impacts on all of these scenarios. In addition to analyzing these impacts, the report identifies necessary mitigations to address any impacts where necessary.

- **The KAI traffic study is looking only at the MidPen development and ignores the surrounding measures that are planned by the County. Moss Beach is one of the access choke points for Big Wave and current plans show two additional traffic lights (Connect the Coastside) in Moss Beach.**

The KAI traffic study referred to in the comment was a preliminary traffic assessment, focusing primarily on conditions at the Carlos Street/Highway 1 intersection. The full traffic analysis includes evaluation of project impacts when added to future foreseeable projects, including Big Wave and information from Connect the Coastside. We have met with the Connect the Coastside team and will coordinate efforts to implement improvements planned by the County and planned by MidPen. New traffic lights have not been approved within the vicinity of the project, but where a traffic light is proposed as a mitigation in our report, the analysis accounts for the impact.

- **How will the traffic flow on Highway 1 be impacted with all the additional signals (maybe one turns into a roundabout), increased traffic volume resulting out of the MidPen and Big Wave developments (ignoring the two proposed hotels in Montara for now), and an estimated 2 million annual visitors to the Coastside?**

The full traffic analysis evaluates traffic conditions at intersections along Highway 1 with project traffic added to existing traffic volumes, and with project traffic added to anticipated future traffic conditions, which will account for traffic from the Big Wave project as well as other reasonably foreseeable future development. The traffic data to be used in the analysis will account for varying traffic at different times of the year, by evaluating weekday am peak hour and pm peak hour conditions, as well as the peak tourist season conditions. Where project volumes are shown to contribute to significant impacts at study intersections, we are proposing traffic mitigations (which may include the installation of roundabouts or traffic signals). If a traffic signal or roundabout is proposed as a mitigation, we account for its impact in our analysis.

- **What is the impact on neighborhood streets and Farallone View Elementary School (many kids walk and bike to school and many roads do not have sidewalks) in Montara and Moss Beach as commuters and tourists try to bypass the gridlock on Highway 1 that will be created by the additional traffic measures and the MidPen and Big Wave developments?**

The traffic analysis includes evaluation of impacts on neighborhood intersections, transit, and bicycle and safety impacts, and MidPen is proposing mitigations for any significant impacts created by our project. The proposed mitigations include addition of sidewalks and relocation of the SamTrans bus stop at Highway 1 to improve pedestrian infrastructure and avoid unsafe crossing at Highway 1. MidPen is not involved in the Big Wave development, but our evaluation does account for the Big Wave development in examining cumulative conditions.

### 3. Traffic (Project Specific – Safety)

- **Blind Curve: MidPen’s preliminary traffic report states that there is no room for a deceleration lane for those making a right turn from Highway 1 onto Carlos. Drivers who yield to bicyclists/pedestrians or slow as southbound cars turn left will be at risk of being rear-ended. The traffic report indicates that it might be possible to cut the hillside back to improve visibility south, but feasibility and Caltrans funding for this are not established.**

MidPen acknowledges the existing safety challenges at Carlos Street/Highway 1 intersection and developed a draft assessment of these conditions in order to engage early on with the community and identify potential solutions. Our traffic consultant has conducted a thorough evaluation of the options to address these safety challenges and proposed mitigation strategy in the traffic impact analysis. A combination of conditions that include 55 mph speed limits, relatively low traffic levels at the intersection, and limited right-of-way make the addition of a traffic light or roundabout a less optimal solution, but final decisions on any improvements would be developed by San Mateo County and Caltrans. MidPen’s proposal for this intersection is to close Carlos Street between Highway 1 and the project entrance to all automobiles except emergency

vehicles. This approach would eliminate the safety issue caused by the limited sight line at the Highway 1/Carlos Street intersection and is more fully discussed in the traffic impact analysis. As noted, Caltrans has jurisdiction over Highway 1 and any and all improvements in the right of way will need to be approved by Caltrans.

- **Car Traffic on Narrow Residential Streets: I am concerned that traffic from the new homes will divert to Carlos and Stetson Streets. Carlos and Stetson will become the most highly trafficked automobile, pedestrian, and bicycle routes in Moss Beach, and the roads are not wide enough to accommodate these activities safely.**

We recognize concerns about the width of Carlos Street, and would note that Stetson is both wider than Carlos and includes sidewalks. By proposing to close off Carlos Street between the project entrance and the Highway 1 intersection, the project would significantly increase safety on this portion of the road. As part of our mitigations, we are proposing a sidewalk connection from the project entrance at Carlos Street to the sidewalks on Sierra Street and Stetson Street.

- **Signalization of the Highway 1/Carlos intersection, or roundabout and a pedestrian crossing in close proximity will most likely result in a significant increase of accidents. Drivers from the South do not have visibility beyond the curve, and stopped traffic or a pedestrians crossing on Highway 1 will add to the accident risk. A reduction of speed will most likely be ignored by many residents and visitors to the Coastside.**

Signalization, roundabouts, and prominent pedestrian crossings are all traffic improvement tools that can increase safety. Caltrans requires standard intersection evaluations before any improvements can take place, and safety considerations must be considered before recommending any improvements. Based on our assessment of traffic impacts from the project and conditions at the current intersection, we are not recommending a traffic signal or roundabout at the Highway 1/Carlos Street intersection. The closure of a portion of Carlos Street to all automobiles except emergency vehicles would address the sight visibility that creates a safety issue at the intersection.

- **Highway traffic calming measures would substantially improve safety at the Carlos and 16<sup>th</sup> Street intersections with Highway 1 where sight distance is limited. Lower highway speed shortens the sight distance required for safe stopping and cross-traffic movements. The Mobility Study suggests raised medians and other features for traffic calming. In addition to further analysis and refinement of Mobility Study concept plans for the area, please fully assess the feasibility of rerouting Carlos Street to 16<sup>th</sup> Street for safer vehicle highway access.**

The traffic consultant for the project evaluated a range of options to improve safety at the Carlos Street/Highway 1 intersection. This analysis includes evaluating the possibility of merging Carlos Street and 16<sup>th</sup> Street – however our current analysis shows this

improvement would not necessarily be the most effective strategy to improve safety and mobility, since it would require significant grading work and would increase delay at the 16<sup>th</sup> Street intersection.

#### 4. Hazardous Waste/Site Contamination

- **What documents are available regarding the real estate transfer of the property? Was some sort of detailed environmental clearance done and is it available to the public?**

MidPen has signed an option to purchase agreement with the current owner of the property. The transfer has not occurred and there are no documents available to the public at this time. MidPen has completed detailed environmental evaluation of existing conditions, including a Phase I, Phase II, additional subsurface investigation, sampling from an existing well on site, and destruction of an unused well. These reports are included in the package that has been submitted to San Mateo County and are available for the public. San Mateo County and the California Coastal Commission are responsible for evaluating these reports as part of their environmental review of the project.

- **The project site was formerly a Navy anti-aircraft training center. We request that soil sampling be conducted at the project site, in consultation with the community regarding what contaminants to test for and what locations to sample on the site.**

MidPen is aware of the history of the site. We have hired an environmental consultant to assess existing environmental conditions on site, which is a standard part of our process. An analysis of site soil conditions is included in the environmental review for the site. The soils testing and analysis did not identify levels of any substances that would pose a potential human risk as a result of the development. The reports recommended no further investigation or remedial action, but we will be implementing a Site Management Plan (SMP) to ensure safety procedures around construction and handling of materials.

#### 5. Sewer Problems

- **There have been numerous sewage system overflows both from the Sewer Authority Mid-Coast sewage treatment plant and pipes, and locally within the Montara Water Sewer District. These repeated, significant sewage spills appear to result, at a minimum, from antiquated and failing pipes. The proposed project should be evaluated for its impact on this failing water system, and for the cumulative sewage impact of this proposed project in conjunction with past, present, and future projects. In addition, there should be an analysis of what monetary contributions will be necessary from MidPen to ensure that there are no additional sewage spills resulting from adding the proposed project to the already failing sewage system.**

The 2013 Local Coastal Program identifies this site as a priority for affordable development (a designation which has been affirmed in 12 LCP updates) and therefore, the site has designated allocations to provide water and sewer capacity. In order to

approve the project, the Montara Water and Sanitary District (MWSD) must conduct a thorough examination of its ability to serve the proposed development, including an evaluation as to whether any capacity improvements are required. MWSD will also determine the appropriate fees for connecting the project to their water and sewer systems. MWSD publishes this fee schedule on their website, which you can find here: <http://mwsd.montara.org/rates-and-budget/rates-and-fees>.

As part of its own analysis, MidPen has completed a review of public services and utilities impacts. Our evaluation shows that the Sewer Authority Mid-Coast has adequate capacity to serve the project and would not require or result in construction of wastewater treatment facilities or expansion of existing treatment facilities.

We encourage members of the public concerned with water and sewer system conditions address concerns to MWSD and the Sewer Authority Mid-Coast (SAM), the wastewater treatment agency for the MidCoast region, of which MWSD is a member. However, based on publicly available data regarding sewer overflows, the number of sewage spills and volume of those spills for both MWSD and SAM was lower in 2017 than for the equivalent systems in Pacifica and Half Moon Bay, and lower than many other systems in the region. This data is available at the following link: <http://baykeeper.org/articles/sanitary-sewer-overflows-ssos-water-year-2017>

MidPen is working closely with MWSD during the design and development of this project and will comply with MWSD specifications and regulations. Cypress Point will have efficient appliances to conserve water, such as high efficiency washers with a water factor of 5 or less, toilets that use less than 1.6 gallons per flush in all residential units, and metering or self-closing faucets in all non-residential lavatories.

## 6. Parking

- **With room for one or two cars in front of each house, increasing automobile density has the potential to generate a lot of conflict.**

MidPen's proposed ratio of 2 parking spaces to each unit is designed to ensure adequate space for all residents and guests who may be parking on site. The design of the project, with one main entrance off of Carlos and all units facing the center of the site, directs residents to follow pathways within the site for easy parking and entry to units and the community building. The internal roadways will also be designed to minimize any conflict and ensure drivers have sufficient space to navigate. Our parking plan will also comply with County Code requirements.

## 7. Drainage

- **When will storm drainage be addressed? How big is the culvert that passes under Highway 1 for Montara Creek, and what is its capacity? What is the coverage (pavement and roofs) for the planned development, and how will this affect a 10-**

**minute runoff in a 100-year storm event? Will the runoff be considered as point source for NPDES purposes?**

Storm drain design and stormwater strategies will be included in the Coastal Development Permit Application, which will be reviewed after the amendment to the zoning/Local Coastal Program is approved. This application will include a conceptual on-site private storm drain system, low impact development, stormwater treatment measures, and an off-site storm drain connection to the existing public system.

The project's new improvements are not anticipated to impact the Montara Creek and culvert capacity. In compliance with hydromodification requirements, peak stormwater runoff flow rates from the new development will remain below or equal to the pre-development condition.

The project is utilizing the Bay Area Hydrology Model (BAHM) to analyze peak flow comparisons for the 2, 5, 10 and 25-year storm events and is designing the development to fully comply with San Mateo County requirements. Caltrans' standard culvert design typically sizes for a 25-year storm event, which is included within the BAHM modeling for the development site. The project anticipates utilizing bio-retention areas as the main best management practice treatment strategy for hydromodification compliance.

Impervious stormwater runoff from the entire site will be treated and controlled per the Municipal Regional Permit (MRP) and San Mateo County requirements. Similar to the surrounding tributary area, the development's 100-year storm event design will comply with San Mateo County requirements and be managed by overland release contained within the public right-of-way.

The development's stormwater runoff will be treated via low impact development best management practices which will help remove potential pollutants from the treatment storm and control flow rates prior to discharging to the existing storm drain system.

## **8. Pedestrian Traffic**

- **A safe crossing is needed at the Lighthouse/16<sup>th</sup> Street for the southbound bus stop and for the Coastal Trail which crosses the highway there. A raised median refuge island, proposed in the Mobility Study, would enable two-stage crossing.**

We understand the concern regarding the Highway 1/Carlos Street/16<sup>th</sup> Street crossing, and recognize that the current configuration does not have a marked crossing to allow pedestrians to easily access the SamTrans Route 17 bus stop across the highway. Our traffic consultant examined existing conditions, project impacts, and potential solutions for addressing this challenge. Adding pedestrian infrastructure across Highway 1, which is managed by Caltrans, would present significant operational challenges due to the 55 mph speed limit and limited sight distance for drivers approaching the intersection from



the south. Therefore, we recommend the consideration of relocating the bus stop to an alternative location to avoid the requirement of crossing Highway 1.

- **If this housing project is to proceed, the Parallel Trail segment in this area must be prioritized and implemented, at a minimum between downtown Moss Beach and 14<sup>th</sup> Street.**

The Parallel Trail is a potential project under the County's jurisdiction. MidPen is working closely with the County and supports the implementation of pedestrian/bicyclist safety and access improvements.

## 9. Jobs (Source of Numbers)

- **They stated that we have 1,400 local jobs in El Granada/Princeton, Moss Beach, and Montara but miss to provide the source information. Jan Lindenthal, MidPen's Vice President of Real Estate Development is quoted in the SM Journal, "Still with 1,300 low-income jobs on the MidCoast." 1,400 vs 1,300 with no source information? Where are the jobs?**

MidPen hosted a series of Open House community outreach meetings in 2016, where we shared information about jobs in the MidCoast region. We provided the following data source and an explanation of the data in two published summaries of these meetings, available on the project's website ([www.midpen-housing.org/moss-beach/](http://www.midpen-housing.org/moss-beach/)). The data is from the Longitudinal Employer-Household Dynamics (LEHD) program at the U.S. Census Bureau. Please see the link at: [www.midpen-housing.org/moss-beach/frequently-asked-questions/](http://www.midpen-housing.org/moss-beach/frequently-asked-questions/). Of the 1,364 total jobs in the MidCoast (from Montara to El Granada): 44% commute 10 miles or more to their work, 69% pay less than \$40,000 a year, and 36% are in the Accommodation and Food Services industry sector. Of the 318 jobs filled by residents in the MidCoast, 40 jobs are in the "Goods Producing" Industry Class, 43 are in the "Trade, Transportation and Utilities" Industry Class, and 235 are in "All Other Services" Industry Class. Of the 1,046 jobs in the MidCoast held by those residing outside the area, 233 are in the "Goods Producing" Industry Class, 112 are in the "Trade, Transportation, and Utilities" Industry Class and 701 are in the "All Other Services" Industry Class.

## 10. Water

- **We request that the project be evaluated for the volume of water (gallons/day) needed for the proposed project, and that these estimates include realistic estimates of water for project residential units, project landscaping, and water for firefighting. Also, the impact of this increased water demand should be evaluated for its impact on water quality to residents in the proposed project and the surrounding Moss Beach community.**

Under policies outlined in the San Mateo County MidCoast Local Coastal Program, both water and sewer capacity have been reserved for the project.

MidPen is working closely with Montara Water and Sanitary District (MWSD) to assess water and wastewater requirements. As a reflection of MidPen's commitment to efficient water usage, Cypress Point will include efficient appliances, such as high efficiency washers with a water factor of 5 or less, toilets that use less than 1.6 gallons per flush in all residential units, and metering or self-closing faucets in all non-residential lavatories. Cypress Point's irrigation system will include an automatic weather-based controller, manual shut-off valves, matched precipitation rate sprinkler heads, a proper setback from non-permeable surfaces, and separate valves for different hydrozones. It will be designed to prevent runoff, low head drainage, and overspray.

Like any development project, the development must receive a formal "will-serve" letter from MWSD before it can proceed.

## 11. Population

- **The MidPen housing proposal is for 71 units totaling 144 bedrooms. At maximum occupancy, there would be 359 residents, and this does not include guests or visitors to the community center. This development would increase the population of Moss Beach east of Highway 1, where this will be built, by 26%. This population increase will take place in one location all at once, as opposed to several decades of gradual development.**

Based on our experience managing more than 100 properties, we seldom see the maximum occupancy reached; the average occupancy is typically much lower than the maximum. We estimate a total of 213 residents for Cypress Point (3 residents per unit). This estimate is based on our experience of managing more than 100 properties. Our on-site property management staff will ensure compliance with our strict limits on the number of residents per unit.

According to the American Communities Survey (ACS), the total estimated population of Moss Beach in 2016 was 3,706. The addition of an estimated 213 residents from the Cypress Point project would therefore increase the population of Moss Beach by 5.7%, not 26% -- however, since population would be likely to increase before the project is constructed, the actual percentage increase would be even smaller.

## 12. Public Transit

- **This project highlights the urgent need for expanded Coastside public transit and the funding that it requires. Quite simply, without convenient school and commuter bus service at this location on the highway corridor, this project cannot be justified.**

MidPen is working collaboratively with local public transit agencies as well as the school district on these issues. We will be paying all required school impact fees and any mitigation fees required by the County for traffic and/or transit improvements.

- **This site is near a SamTrans bus stop serving the #17 bus. Measures should be taken to ensure safe and convenient access and waiting areas for passengers. These measures should include crosswalks and appropriate pedestrian access to the bus stop. This bus operates on headways of approximately one hour. Measures to increase the level of service should be taken.**

MidPen is also interested in ensuring the safety and convenient access to public transit for residents and the local community. We are studying the project's impact on transit service, and are working with SamTrans and the County to determine what improvements, if any, may be required to mitigate for the impacts of the proposed project. As previously stated, we recognize that there is currently no marked crossing to access the bus stop on the opposite side of Highway 1, and we recommended a potential relocation of that bus stop to provide better access. We will continue to coordinate with SamTrans and San Mateo County to determine potential operations and access improvements to strengthen the quality of transit in the area.

- **Given the size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and to reduce transportation impacts associated with the project.**

MidPen is preparing a robust transportation impact analysis that will meet all requirements under the California Environmental Quality Act (CEQA). The analysis includes a commitment to develop a TDM and lists measures that could be included in the project.