

From: [Ann R](#)
To: [Planning Commission](#)
Subject: Re: MidPen Housing Project PLN 2022-00220
Date: Wednesday, September 13, 2023 12:05:00 AM

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On Tue, Sep 12, 2023 at 11:39 PM Ann R <midcoastann@gmail.com> wrote:

Dear Commission and Mr. Schaller:

I am Ann Rothman 30 year resident of Moss Beach and living within the 300ft. Notification map for the proposed Cypress Point development. The DEIR remains incomplete, inaccurate and not in compliance with CEQA. The EIR references outdated maps, manuals and methodologies. Why? Was this intentional?

The most important information in the EIR is tucked at the end 5.3 Significant Unavoidable Environmental Effect:

“ CEQA guidelines section 15126.2(c) requires the EIRs provide a discussion of significant impacts that cannot be mitigated to a level of insignificance without imposing an alternative design, their implications and reasons why the project is proposed, notwithstanding their effect. ...

Based on the analysis provided in Chapter 3, the project would have 4 significant unavoidable impacts associated with transportation Section 3.10

The project’s daily VMT vehicle miles traveled per capita by resident would be above the VMT Threshold for the Bay Area regional average, the County average, or the coastal transportation analysis zone average. Mitigation is not possible. There are transportation related hazards on Hwy 1 including lack of crossing opportunities, high speed traffic, vegetation and roadway design that limits visibility or safe lines of sight, and limited lighting. In the project site, pedestrians and bicycles currently travel along HWY 1 at Unsignalized intersections in Moss Beach, is identified hazards due to lack of facilities, line of sight deficiencies and traffic speeds. THE PROJECT’S PEDESTRIAN SAFETY IMPACT WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE WITH MITIGATION. The project would also cumulatively contribute to a SIGNIFICANT CUMULATIVE TRANSPORTATION IMPACT RELATED TO HAZARDS.”

What is not mentioned anywhere is the impact the proposed project would have on fire and medical response times for Coastside Fire Station 44 which is on Stetson St. at the junction of Stetson and Kenmore Sts. Kelmore Street was not even studied for traffic effects even though it is equally traveled as Stetson Street. There is no evidence that Coastside Fire Department Station 44 leadership has been consulted regarding how the development would affect emergency response. Shouldn’t a study be conducted to evaluate how an evacuation would affect surrounding neighbors as well as the fire station response times. Because a majority of Coastside Fire Station 44 calls are medical in nature time is of the essence. Every second counts when someone is experiencing a heart attack, stroke, etc. Coastside Fire Station 44 is located on Stetson St. If Carlos Street backs up and residents of Cypress Point begin using Stetson and Kelmore Streets as alternative routes, traffic will pass directly in front of the fire station and potentially interfere with fire response. There is barely room

on the road for 2 cars to pass. How will cars get out of the way of fire vehicles with residents parked cars and 2 way traffic flow? Many residents in the surrounding neighborhood have hillside driveways that they must back out of. Increased traffic will hinder their ability to vacate their homes. In an emergency evacuation situation they may get trapped with no way out. The same could happen to the Fire Station with trucks unable to get out of the neighborhood. PUBLIC SAFETY is far more IMPORTANT than meeting RHNA housing goals for the county.

16th Street sits in an Earthquake liquefaction zone. Because outdated earthquake maps were used in the EIR this data is not presented properly. This is another potential hazard. A signal at 16th Street has the potential to cause more accidents than help since it sits on a blind curve. Because power goes out frequently in Moss Beach during storms a signal at 16th Street could prove dangerous and potentially deadly due to the blind curve.

CA Red Legged Frogs, an endangered and almost extinct species, has been identified in the Moss Beach corridor around the proposed development per Joe La Clair. Specific habitat in front of Moss Beach Post Office next to highway 1 is one site that has been identified. This is important because the multimodal trail is planned for this location. As 90% of CA Red Legged Frog habitat has been lost resulting in extinction in the Central Valley and Sierra Nevada this habitat is critical for species survival.

During last year's winter storms SAM flooded and shut resulting in a major burst pipe in Montara leading to raw sewage dumped into the ocean. Imagine what environmental catastrophe could happen with all these new units, possibility of 359 new people utilizing the sewer system in addition to other newly proposed developments. The current sewer system is in need of significant upgrades. Half Moon Bay is involved in litigation with MWSD regarding the sewer system. This is of significant importance. Not mentioned in EIR.

When calculating occupancy rates why wasn't the 2+1 rule not utilized. MidPen has undercounted the possible number of residents. Occupancy rules would allow for 359 adults. This should be assumed. This would add to the number of cars on the road and VMT. There is NO ON DEMAND SAM TRANS in Moss Beach as there is in El Granada. Ride share services are very expensive and not readily available on the coast. There is no school bus service. Moss Beach is a car dependent community.

Services that MidPen promises are supplied by local nonprofits. What happens if they do not have funding and cannot provide services such as after school programming and child care? Is there a potential for the services to be eliminated?

When Alternatives are suggested in the EIR, reducing the number of units to 30 still creates significant traffic and pedestrian hazards. This proves what neighbors have been saying that this site is not appropriate for car dependent development. Other alternative sites presented in the EIR seemed more appropriate than the proposed site. Why hasn't anyone been contacted since 2017 for potential sale of land owned by Cabrillo School District?

Lack of reliable Broadband internet and cell phone service and non redundant communications create major hazards for all residents and potential residents to the coast. First responders lost all communication while highway 1 and 92 became blocked during winter storms putting all residents in harms way. Moss Beach is surrounded by very high

fire danger evacuation routes which can easily cause entrapment during a wildfire. Lack of a published county evacuation plan presents a significant risk for all coastal residents.

Throughout the EIR many questions remain. The EIR is incomplete and needs to evaluate the above mentioned concerns. A Statement of Overriding Consideration should not be issued by the county at this time. There are too many safety and environmental concerns remaining.

Thank you for your consideration.

Best,

Ann Rothman

Moss Beach