

Midcoast Community Council

representing Montara, Moss Beach, El Granada, Princeton, and Miramar
P.O. Box 248, Moss Beach, CA 94038-0248 - www.MidcoastCommunityCouncil.org

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

Date: September 26, 2018

To: Michael Schaller, Project Planner

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

From: Midcoast Community Council/ Dave Olson, Chair

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

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

Hazardous Materials

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

Traffic Impacts and the Comprehensive Transportation Management Plan (CTMP)

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

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

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

MCC 9/27/17 comments¹ on the pre-application for this project focused on the many long-standing community concerns regarding traffic, transit, and bike/pedestrian safety & mobility that are the subject of the Highway 1 Safety & Mobility Improvement Studies (Mobility Study), the Midcoast Highway 1 Crossings Project and the soon-to-be-released final draft of Connect the Coastside's Comprehensive Transportation Management Plan. Many years of Midcoast growth without much-needed and long-identified bike/ped safety and mobility improvements have caught up with us now with too many people dependent on their cars and stuck in traffic without safe and convenient alternative transportation. The key challenge to this project is the isolated rural site without adequate transit or bike/ped facilities, leaving residents dependent on their automobiles to reach jobs and services on already congested roads.

Midcoast Residential Build-out

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

Affordability and Residency Preference for Local Workers

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

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

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

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

Construction Phasing

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

Public Transit

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

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

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

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

Bike/Pedestrian Safety & Mobility

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

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

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

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

Vehicle Highway Access & Safety

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

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

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

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

Discrepancies in submittal documents

Consistency Evaluation

Table 1, LCP Policies:

Policy 3.16(a)

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

Policy 3.3:

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

Table 4 Community Plan 7.2(b):

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

Cumulative Impacts Analysis

Table 3 – List of Reasonably Foreseeable Projects

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

Table 4&5 -- Population & Housing Units

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

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

Responses to Workshop Comments

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

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

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

Thank you for the opportunity to comment.