

Sabrina Brennan
165 La Grande Ave.
Moss Beach, CA 94038

February 14, 2012

Kenneth Kirkey, Director of Planning
Association of Bay Area Governments
PO Box 2050
Oakland, CA 94604-2050

Re: Application by San Mateo County for Priority Development Area (PDA) for the unincorporated Midcoast

Dear Mr. Kirkey,

For the reasons given below, I request that ABAG not approve the request to designate the semi-rural San Mateo County Midcoast as a PDA.

I appreciate regional development and conservation strategies that limit urban sprawl and promote urban open space, green street programs, farmers markets, wetland restoration, parks, community colleges, school bus service, food-hubs that provide professional food buyers with fresh produce grown by local farmers, and bicycle/pedestrian safety and mobility improvements near Bay Area transit and jobs.

I live in Moss Beach, one of five small unincorporated farming, fishing, and eco-tourism communities located along the semi-rural San Mateo County Midcoast. The unincorporated Midcoast communities of El Granada, Miramar, Princeton, Montara, and Moss Beach are not located near Bay Area transit or jobs. Infrastructure is extremely limited in all five communities — they lack sidewalks, street lights, curbs, and storm drainage. The lack of storm drainage in the unincorporated urban Midcoast results in significant flooding, runoff, and erosion during the rainy season. The Midcoast has woefully inadequate transit service and no school bus service. Chronic backups on 10 scenic miles of Highway 1, the only transportation corridor, bring traffic to a crawl on a daily basis. The Midcoast does not have a supermarket, library, or community center. The Midcoast lacks public and private school capacity. We do have one small hospital. Most voting age citizens commute daily over the Santa Cruz Mountains to jobs on the Bayside of San Francisco, San Mateo, and Santa Clara counties.

I am concerned about a number of issues that impact ABAG designation of the San Mateo County Midcoast as a Priority Development Area (PDA).

The Midcoast is located entirely within the Coastal Zone. I am concerned about the inherent policy conflicts between PDA designations, the California Coastal Act and San Mateo County Local Coastal Program (LCP) policies for the Midcoast. I have not been able to find any information on ABAG, FOCUS, and OneBayArea websites as to how Coastal Act and LCP policy conflicts would be resolved. If the ABAG Executive Board designates the unincorporated Midcoast as a PDA, the Midcoast could become a target for state mandated, higher density development than allowed by the LCP. Any proposed Coastside development could be subject

to appeal to the California Coastal Commission, which is likely to deny it.

A PDA designation is not appropriate for areas with significant constraints on new development. The Midcoast has inadequate infrastructure, including water, sewer, schools, and highway capacity, to accommodate planned buildout. All new development must be consistent with the County's LCP, which was certified in 1980. An update to the Midcoast LCP has been in limbo for more than a decade, and is still under review by the California Coastal Commission.

The low-lying portions of the Midcoast are located within a tsunami inundation zone, flood zone, and sea level rise zone. Specifically all of Princeton, areas along Airport Street including the proposed Big Wave project, and the Manufactured Home Park, nearly all of Miramar, and a small part of El Granada are within the mapped flood zone. Strategies for coping with coastal erosion, landslides, and sea level rise include Planned Retreat. Designating a PDA in a semi-rural unincorporated area that must plan for sea level rise impacts and is far from transit and jobs is not a sustainable growth strategy.

Designating PDAs in unincorporated areas located in the Coastal Zone that are far from transit/jobs would force counties plagued by budget problems and aggressive housing allocation numbers to change zoning regulations to maximize infill development. Rezoning the Coastal Zone for high density development in an area that is projected to experience sea level rise is not smart planning. PDAs are envisioned to "support focused growth by accommodating growth as mixed use, infill development near transit and job centers, with an emphasis on housing." That's an urban Bayside strategy, and has the potential to conflict with the Coastal Act and LCP.

The FOCUS Application Guidelines require that a PDA must meet all of the following criteria: (a) the area is within an existing community, (b) the area is near existing or planned fixed transit (or is served by comparable bus service), and (c) the area is planned or is planning for more housing.

The Midcoast area does not meet all of these criteria:

- 1) There is no plan for fixed transit and SAMTRANS bus service is marginal.
 - a. Route 17 (Montara to HMB) 90-min interval 8-6 daily (9-5 Sun); 60-min interval 6-8 AM weekdays.
 - b. Route 294 (Pacifica to San Mateo) 90-min interval 8-6 weekdays only.
- 2) The coastside has a significant surplus of housing compared to jobs, and residents must commute "over the hill" to jobs on the Bayside of San Mateo, Santa Clara, and San Francisco counties.
- 3) Housing is the lowest priority land use under the Coastal Act.

Another Midcoast issue which severely impacts PDA growth and development objectives is the inadequate water supply and delivery capacity. Coastside County Water District (CCWD) receives a limited supply of water from the Hetch Hetchy system, but by agreement with the City and County of San Francisco, cannot increase this supply. Montara Water and Sanitary District (MWSD) must rely entirely upon wells for its drinking water supply, which are even less robust than CCWD's.

An additional consideration is that while MWSD issues permits based on safe yield, meaning how much water they can reliably expect to get in drought years, CCWD issues permits based on

average yield (across wet and dry years). This means that half the time, CCWD is over-committed on the water supply, and every new connection increases the probability of mandatory rationing in dry years. Many homes in the unincorporated urban Midcoast are on private wells; salt water intrusion has been a problem in the past and is an on-going concern for some property owners. There are hundreds of people who paid in the 1980s to have the right to hook up. All they have to do is go to San Mateo County, pull a building permit and go to CCWD and say "hook me up" and CCWD has to do it. If/when CCWD actually hooks up all of the pre-sold water connections, there would be mandatory rationing about half the time. The bottom line is that if the Midcoast is currently at 50% buildout as the San Mateo County Planning Department states, there is simply no water available to get to full buildout, and especially not for increasing the amount of development.

The ABAG memo dated 8/30/11 finds that building homes in the right places — near jobs and transit options — reduces the need to drive for everyday needs, with the associated benefits of improved air quality and reduced greenhouse gas emissions. SB 375 requires the California Air Resources Board (CARB) to develop regional greenhouse gas emission reduction targets to be achieved from the automobile and light truck sectors for 2020 and 2035. San Mateo County has a jobs/housing imbalance, which leads to long commute distances from around the Bay Area to Bayside jobs. The county needs more housing near jobs and transit corridors to reduce vehicle miles traveled (VMT) and greenhouse gas emissions. The San Mateo County Coastside is one of the outlying areas providing housing for Bayside jobs, and thus has the opposite jobs/housing imbalance. There is no viable transit connection to Bayside jobs. Building more housing on the Coastside, far from the jobs center and transit corridor will not help reduce VMT and greenhouse gas emissions, but will actually contribute to the problem.

The Coastside's unique scenic and environmental resources are a treasure to be shared with all Californians. This area, without transit connections and isolated from the Bayside jobs centers, is best preserved as a small town farming, fishing, and visitor-serving destination, and the jobs it supports. Coastside VMT and greenhouse gas emissions can be reduced by improving local bus service and building the Hwy 1 multi-modal trail and safe highway crossings. Funding for these projects should come from Measure A. The new ABAG Priority Development Area guidelines ('Rural Mixed-Use Corridor' and the 'Rural Town Center') are too vague to ensure that grant funding incentives would go towards building pedestrian and bicycle friendly projects such as trails.

Over the past four years San Mateo County has missed two opportunities to apply for Measure A funding for Midcoast pedestrian and bicycle initiatives. This has been frustrating for residents who are concerned about the growing number of pedestrian and bicycle accidents and fatalities on Highway 1. The Route One pedestrian/bike trail from Montara through Half Moon Bay is specifically identified in the County Transportation Authority's Strategic Plan 2009-2013 as eligible for Pedestrian and Bicycle Funds from Measure A. Although Half Moon Bay has successfully applied for funds for a significant portion of the Trail within Half Moon Bay city limits, San Mateo County has not yet submitted an application for the unincorporated Midcoast segment, despite two calls for project submittals in the past four years.

The ABAG memo dated 8/30/11 states that Priority Development Areas are areas that are ripe for growth. "PDAs comprise a network of neighborhoods that are expected to accommodate the majority of the region's population and employment growth." Though ABAG and MTC can't

force cities to accept their projections, these agencies can withhold transportation grants from cities and counties that don't comply. Development of these areas would be bolstered by state grants, with 70% going to PDAs. ABAG & MTC propose regional funding program: OneBayArea Grant to support SCS (Sustainable Communities Strategy) implementation. \$211 million for Bay Area counties, based on population, Regional Housing Needs Allocation (RHNA), and actual housing production.

I'm concerned about the alarming lack of local participation in the County's recent decision to apply for a PDA designation in the unincorporated Midcoast. I did not receive adequate notification about the County PDA application. I was informed of this application only four days before the Board of Supervisors meeting of January 31, 2012, when the agenda was published online. I receive both the County list-serve notifications regarding permit and planning and Midcoast Community Council meeting agendas and I do not recall any public discussion or public notice regarding a proposed PDA in my community. I'm very concerned that this item was put on the Board of Supervisors consent calendar without first vetting it through the public.

I respectfully request that ABAG not approve the proposed PDA for the San Mateo County unincorporated Midcoast.

Sincerely,
Sabrina Brennan

cc: Bill Kehoe, Chair, Midcoast Community Council
Laura Stein, Vice-Chair, Midcoast Community Council
Lisa Ketcham, Secretary, Midcoast Community Council
San Mateo County Board of Supervisors
Steve Monowitz, Deputy Director, San Mateo County Planning Division
Ruby Pap, California Coastal Commission
Madeleine Cavalieri, California Coastal Commission
Dan Carl, California Coastal Commission