

July 17, 2020

Joe LaClair  
Katy Faulkner  
San Mateo County Planning and Building  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

**Re: Connect the Coastside (Comprehensive Transportation Management Plan) Public Working Draft, January 15, 2020 and Virtual Conversations**

Dear Joe and Katy,

Green Foothills has a long-standing interest in coastal protection, and the San Mateo County Local Coastal Program. We participated in the development of the LCP (1978-1980) and in all subsequent LCP Amendments. On behalf of Green Foothills, I have the following comments.

As stated in the Draft, the CTMP is a requirement of LCP Policy 2.53 which states:

***Policy 2.53: "Develop a comprehensive transportation management plan to address the cumulative traffic impacts of residential development, including single-family, two-family, multi-family, and second dwelling units, on roads and highways in the entire Midcoast, including the City of Half Moon Bay. The plan shall be based on the results of an analysis that identifies the total cumulative traffic impact of projected new development at LCP buildout and shall propose specific LCP policies designed to offset the demand for all new vehicle trips generated by new residential development on Highway 1, Highway 92, and relevant local streets, during commuter peak periods and peak recreation periods; and policies for new residential development to mitigate for residential development's significant adverse cumulative impacts on public access to the beaches of the Midcoast region of San Mateo County.***

***The plan shall thoroughly evaluate the feasibility of developing an in-lieu fee traffic mitigation program, the expansion of public transit, including buses and shuttles, and development of a mandatory lot merger program."***

Despite the clear mandates of this Policy (required by the certified Midcoast LCP Update, approved by the Board of Supervisors in 2012), the Draft CTMP continues to fall woefully short of the required analysis and development of specific LCP policies that will offset the demand for all new vehicle trips generated by new residential development on Highway 1, Highway 92, and relevant local streets, during

commuter peak periods and peak recreation periods. Green Foothills is concerned that the shortened time frame of just 20 years (due to the passage of five years since the 2016 Draft CTMP was issued) will not adequately address the Coastal Act and LCP requirements to analyze cumulative traffic impacts of new residential development at Buildout and could potentially evade the necessity of changes to land use plan policies and zoning regulations to reduce the residential buildout of the urban Midcoast. LCP Policy 2.53 is a companion to Policy 2.52 Traffic Mitigation for all development in the Urban Midcoast, which addresses impacts of non-residential development on Highways 1 and 92; this Policy's traffic mitigation requirements and provisions for assessing and mitigating significant adverse cumulative impacts on public access to the beaches of the Midcoast region should be specifically referenced in the CTMP.

While the Land Use Recommendations (Overview Factsheet and Land Use Proposed Policies Factsheets) briefly mention a Lot Merger and a Lot Retirement Program, these programs are relegated to future actions or studies at an unknown time. In fact, the Board of Supervisors adopted a policy in 2006 authorizing a mandatory lot merger program, yet nothing has been done to date to implement Mandatory Lot Mergers. Why is Connect the Coastside now proposing another voluntary merger program, per the Land Use Recommendations handout? How many lots are held in contiguous ownership, with at least one parcel undeveloped which would make them eligible for Mandatory Lot Mergers? How do the Witt and Abernathy court decisions affect Mandatory Lot Mergers? Aren't contiguous lots that are in common ownership (that have been sold or deeded as such since their creation), already deemed just one legal lot or parcel, per Witt and Abernathy?

Please include an accurate count of the number of lots in the Midcoast urban area that may well be unbuildable due to their location within extremely high hazard areas (Seal Cove Zone 1), are located either under water or in the path of Sea Level Rise (Seal Cove and Princeton), or are within Environmentally Sensitive Habitat Areas or their buffers (Montecito Riparian Area and other areas).

Specific comments on the January 15, 2020 Draft and Handouts:

Planning Context and Relationship to Other Plans, page 3: states that the Connect the Coastside was developed over a five-year period, from 2014-19, but the traffic data is from 2014. This is woefully out of date. 2019 data should be used, as COVID-19 strictures in place in 2020 render current data unusable.

Goals and Objectives, page 4: Objective 2.1 should be corrected to include "residential" between "likely" and "development" in order to accurately reflect the requirements of LCP Policy 2.53. Objective 2.3 should be changed to read: "Implement a mandatory lot merger program...". Objective 2.4 should be changed to read: "Implement a mandatory lot retirement program to reduce traffic impacts from new residential subdivisions within the urban Midcoast area. (n.b., the potential for subdivisions within the rural areas zoned RM-CZ or PAD in the Coastal Zone is de minimus, as most of these lands are now owned by public agencies (GGNRA, State Parks, Midpeninsula Regional Open Space District, San Mateo

County Parks) or land trusts (POST and Coastside Land Trust). Other major rural land parcels are used for landfill (Ox Mountain) or quarry (Vulcan). Restrictive RM-CZ and PAD zoning permits only one residence per 40-160 acres.)

Buildout Conditions, page 36: The Buildout Land Use Projections (3.1.1) uses outdated data as the basis for the Maximum Buildout Forecast (MBF). The MBF projects a total of 12,352 housing units within the Study Area at Buildout; this total was also in the November 20, 2014 CTMP Buildout Analysis and Traffic Projections Report (Table 9). The analysis states: “the maximum buildout projections were developed using currently adopted plans and zoning for each area and an inventory of vacant or underutilized parcels in the Study Area, which includes the Midcoast, Half Moon Bay and certain surrounding rural lands” For Half Moon Bay, the “currently adopted plans and zoning” is the outdated 24 year-old Local Coastal Program. The City’s comprehensive LCP Update includes updated and more accurate data for existing and potential residential units (Half Moon Bay Local Coastal Land Use Plan Public Review Draft June 2019, Appendix B). Please use these numbers. For the Urban Midcoast, the San Mateo County Midcoast LCP Update (June, 2013) projected 6,757-7,153 units in the Midcoast (note these projections did not include the Midcoast rural area, and no updated forecast was included for Half Moon Bay). Green Foothills criticized the projections of 12,352 housing units at Buildout in the November 24, 2014 Report in our letter of November 2, 2015 re: Workshop #3 for Connect the Coastsides, as several thousand acres of rural land within the Study Area including McNee Ranch State Park, Rancho Corral de Tierra, Scarper Ridge, Pillar Point Bluff, Johnston Ranch, Madonna Creek Ranch, Miramontes Ridge, and hundreds of undeveloped lots within Half Moon Bay (Wavecrest, West of Railroad) have been acquired by public agencies, Coastside Land Trust, and Peninsula Open Space Trust since 1980. Additionally several of the PUDs in Half Moon Bay have been developed with far fewer residential units than the estimated maximum allowable under the City’s 1996 LCP; for example Pacific Ridge (Ailanto) is being developed with 63 residential units instead of 228; no additional units are permitted, and Ocean Colony is developed with 636 units (with 50 more permitted) instead of 1050 total units. (see Table B-2 Changes in Residential Buildout in PDs 1996 LUP vs. 2019 LUP Update, Appendix B, Half Moon Bay Local Coastal Land Use Plan June 2019). Please update the Buildout projections to ensure they are accurate and use the best available current data.

Highway 92 proposed projects (pages 47,53, 84) include replacement of the traffic signal at the Lower Skyline Blvd/Highway 92 intersection with a roundabout, as well as a proposed roundabout at the Upper Skyline Blvd/Highway 92 intersection. Both of these roundabouts, while commendable intersection improvements in terms of safety and highway operations, present significant environmental challenges. The Lower Skyline intersection is adjacent to significant environmentally sensitive habitats that support special status species, including the California red-legged frog, and the San Francisco garter snake. Adjacent serpentine grasslands also support several special status plants and butterflies. Topographical challenges and safety concerns for pedestrians, bicyclists and equestrians crossing Highway 92 at the Upper Skyline intersection are cited in the Draft EIR for the Southern Skyline Boulevard Ridge Trail Extension Project (June 24, 2020) to propose relocation of a new parking lot and trailhead to an area 1 ½ miles south of the Highway 92-Skyline Boulevard intersection.

The DEIR notes this would reduce hazards to people parking at the existing overlook at Highway 92/Upper Skyline Blvd. and attempting to cross the highway in order to use northern segment of this trail. See: <https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=d887d80d2bee913b66917f01b7ee3a05faa8b6f9d8b84fba-d90a943ffa69a4e5&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0> Any SF PUC owned land required for Roundabouts or other Highway 92 widening will require mitigation for loss of important watershed values and habitat protection. Footnote 1 to Table 19 (page 68), notes the estimated costs of projects do not include details such as extensive grading, retaining walls, and land acquisition; for the two Roundabouts and Highway 92 Passing/Climbing lanes the costs of mitigation for loss of watershed land, increased stormwater runoff, and loss of wildlife habitat(s) is likely prohibitive.

Roadway Widening – providing passing lane/climbing lane on Highway 92 between Half Moon Bay City Limit and existing two-lane segment (page 48). We are unsure what segment of Highway 92 this refers to. Previous CTMP Draft called for a continuous uphill passing lane between Half Moon Bay City Limits and the Pilarcitos Creek Bridge. There is no justification for “uphill” passing lanes in this segment as there is no significant grade. It would be important to provide new left turn acceleration/deceleration lane in locations where there is significant traffic from adjacent businesses or side streets (HMB Nursery, Vulcan Quarry, Santa’s Tree Farm, Cozzolino, etc. In fact, the EIR for the Pilarcitos (now Vulcan) Quarry expansion deferred improvements to the intersection of Highway 92 and the quarry road until there was a more comprehensive plan for Highway 92. For the segment of Highway 92 between Pilarcitos Creek Bridge and Upper Skyline, there are generous shoulders that cyclists use.

The listed Bicycle and Pedestrian projects for Highway 92 in the 2011 Comprehensive Bicycle and Pedestrian Plan (page 53) include 7-foot wide shoulders between Highway 1 and State Route 35. For the Highway 92 segment between Half Moon Bay City Limits and Pilarcitos Creek, the Regional Water Quality Control Board requirements will include costly stormwater collection and treatment facilities for any widening of Highway 92. Caltrans does not own sufficient Right of Way throughout this segment to accommodate widening; there will be significant additional costs of land acquisition. For the segment between Upper and Lower Skyline Blvd., prior requirements by the SFPUC to mitigate for loss of 28 acres of Peninsula Watershed Lands resulted in Caltrans dropping the planned straightening of curves and widening Highway 92. Table 18, pages 65-66 includes estimated costs and network impacts. “Lower Roundabout”, “SR 92 Passing/Climbing Lanes” and “Lower Roundabout” all have “High” costs and “High” network impacts. As detailed above, we believe that the actual costs are much greater than the CTC assumes due to the stormwater facilities and mitigation for loss of watershed land/habitat mitigation requirements.

Public Process: The recent virtual conversations were wholly inadequate. Leaders and recorders of the small group breakouts did not have adequate background to understand and convey comments or questions by attendees of the individual groups. There was no opportunity for all attendees to hear one another, or ask questions of the presenters. Green Foothills objected to a similar controlled format at early CTC workshops in 2015, and as a result the County provided a Town Hall format for Workshop #3.



This format, with an initial presentation by Planning Staff and Consultants also provided time for the 60-70 people in the audience to ask questions and for everyone to hear the answers as the presentation went along. Staff was able to duly record the comments.

Plan Implementation, pages 80 et seq: This section is limited to discussion of implementation of proposed projects. Under 6.1.1 Actors, the San Mateo County General Plan is mentioned, yet there is no mention of the County's Local Coastal Program, which has specific requirements for sizing, timing and conditions applicable to major Public Works projects, and which also provides for Appeals of Coastal Development Permits to the California Coastal Commission. Under Partners (6.1.2), for the California Coastal Commission there is no mention of the requirement for a Coastal Development Permit for Development (which includes Public Works projects) within the Coastal Zone, nor is there mention of the Commission's authority as an appellate body for Coastal Development Permits .

Green Foothills is concerned that the Draft CTMP does not call for relevant policies and actions, including lot retirement and lot consolidions to be incorporated into the Local Coastal Program. Yet Policy 2.53 requires (in relevant part) that the CTMP: ***"... shall propose specific LCP policies designed to offset the demand for all new vehicle trips generated by new residential development on Highway 1, Highway 92, and relevant local streets, during commuter peak periods and peak recreation periods; and policies for new residential development to mitigate for residential development's significant adverse cumulative impacts on public access to the beaches of the Midcoast region of San Mateo County... and policies for new residential development to mitigate for residential development's significant adverse cumulative impacts on public access to the beaches of the Midcoast region of San Mateo County."***

Green Foothills strongly recommends revisions to correct errors and inconsistencies, as detailed above. We also recommend that requirements of Policy 2.53 be fully met, including appropriate amendments to the Local Coastal Program to help ensure that they will be implemented.

Thank you for consideration of our comments.

Sincerely,

Lennie Roberts, Legislative Advocate, Green Foothills