

Date: September 26, 2017

To: Michael Schaller, Senior Planner, San Mateo County Planning & Building Dept.

From: Resist Density

Re: Pre-Application Meeting for proposed MidPen Housing Cypress Point, Moss Beach

PRE2017-00032, APN 037-022-070

Via Email

Dear Mike,

Thank you for hosting the pre-application meeting for MidPen Housing's proposed Cypress Point project. Attached is a list of Resist Density's concerns for the record. In addition, we would like to submit the following questions to MidPen, and add these to the record.

- 1) The project site was formerly a Naval 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.
- 2) 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 fire fighting. 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.
- 3) There have been numerous sewage system overflows both from the Sewer Authority Midcoast 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 sewer system, and for the cumulative sewage impact of this proposed project in conjunction with past, present and future projects. In addition, there should be 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.
- 4) MidPen had a preliminary traffic study prepared by Kittelson Associates in June, 2017 which admitted that the proposed project would increase traffic at the Etheldore/Highway 1 and/or the California/Highway 1 intersections for existing and future trips that would otherwise access Highway 1 at Carlos Street. However, Resist Density believes this study underestimated existing traffic conditions, particularly weekend traffic since the opening of the Lantos Tunnel. This study has underestimated traffic that would be added by the proposed project. The study also did not consider Highway 1 pedestrian crossing proposed under the LCP for this area.



Key Concerns for MidPen Pre-App Meeting 9/20/17

Proposed Development of Parcel APN 037-022-070 in Moss Beach (across from Point Montara Lighthouse)

MidPen's proposed 71-unit housing development discussion has two tracks — the critical housing shortage, which we all recognize, and the inappropriate location for such a large development. Resist Density's concerns focus on the inadequate infrastructure and health / safety dangers of this project.

Increased Traffic

There are no alternative routes on the coast – there is only one road in, through and out. The Midcoast section of HWY 1 is a critical daily travel corridor, and it is limited to one lane in each direction along the scenic portion of Montara. Adding a large housing development to the Midcoast will only compound increased traffic that has occurred since the Lantos tunnel opened in 2013. MidPen has not provided any traffic mitigation solutions for the hundreds of additional cars of this development. Furthermore, "Connect the Coastside" Transportation Management Plan proposes the addition of multiple crosswalks and at least 2 traffic lights in Moss Beach without any recommendation to improve public transit. Questions of disaster preparedness and emergencies requiring first-responder access are coming to head as traffic worsens.

MidPen Traffic Assessment is Lacking

As part of MidPen's Pre-Application, it has released an initial traffic assessment by KAI consultants. The whole premise of KAI's findings that the MidPen project will not significantly impact the HWY 1 / Carlos Street intersection is flawed. We question KAI's numbers of projected car trips the MidPen development will create. How did they arrive at these numbers? Further, it does not take into account the cumulative impact the MidPen project will have when combined with the Big Wave large-scale commercial project, 2 proposed hotels, infill building and second units, and increasing coastal tourism traffic.

No Solution to Dangerous Blind Curve

The proposed MidPen Housing development is located at a dangerous blind curve on Highway 1. KAI field measurements at the HWY I/Carlos Street intersection found that the sight distance to the South was 305 feet, or about half of Caltrans' required corner sight distance of 605. By KAI's own assessment, grading and/or tree removal will be insufficient to meet the required sight distance due to the vertical dip.

All 3 Possible Intersection Controls are Unacceptable

In addition to the insufficient sight distance, KAI's traffic study recognizes that there are overlapping and conflicting left turns using the same lane for drivers entering Carlos and drivers entering Pt Montara Lighthouse. The pedestrian crossing of HWY 1 is also unsafe. Three intersection controls are evaluated but all have drawbacks and none solve the sight distance problem for drivers or pedestrians:

- 1) Signal/Traffic light control evaluated, and not warranted
- 2) Roundabout does not solve the sight distance problem and may be too expensive
- 3) Stop Control essentially what already exists except add a no-left-turn off Carlos.

Roads Safety - Concerns for Children and Pedestrians

There is no safe way to make a left (southbound) turn off Carlos onto HWY1. The KAI study fails to mention the impact that hundreds of additional cars will have on neighborhood roads, and doesn't note that these roads are substandard - too narrow and lacking sidewalks - posing a safety risk for pedestrians and children

who will have to share the same roads with impatient drivers. Even the proposal to make Carlos one-way southbound doesn't assess traffic impacts to neighborhood streets or the Etheldore intersection.

Population Increase of 26%

The MidPen housing proposal is for 71 units totaling 144 bedrooms. At maximum occupancy, there would be 359 residents. And this doesn't include guests or visitors to the community center. This development would increase the population of Moss Beach East of HW 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.

Failing Sewer System – SSOs

The sewer infrastructure on the coast is failing. There have been approximately 101 Sanitary Sewage Overflows (SSOs) over the last 5.5 years, many of which are a result of failed or broken pipes and root intrusion. These overflows endanger public health and the environment. This failing sewer system must be addressed before additional development is approved. What is the assessment of bringing a 71-unit housing development online all at once?

Water Capacity

Montara Water and Sanitary District states it has plenty of water for this project. In addition to water quantity, there is concern for water allotment, pressure and distribution. Is the water distribution system capable to handle the added burden of an emergency such as a large fire? Is the water infrastructure capable to handle this pace of growth and emergencies? Has this been assessed?

Potential for Environmental damage and the Critical Coastal Area (CCA)

The 11-acre property is located approximately 200 feet from the Fitzgerald Marine Reserve, an identified CCA. It deserves special protection due to its close proximity to Montara Creek that runs directly into the Fitzgerald Marine Reserve. The scale of the MidPen development would cause substantial disruption and removal of earth, trees and structures with possible toxic hazards. Comprehensive testing must be made throughout the site to check for contamination and toxins such as asbestos, lead, solvents and other chemical compounds that were commonly used at military facilities like these. The site is located on a hill, so any runoff would head directly toward the creek and ocean below.

Cumulative Effects

The impacts of a large housing development, when combined with other nearby developments such as the approved Big Wave project in Moss Beach (estimated 1500 car trips per day), two proposed hotels in Montara, and the annual infill of new homes, second units, and buildings, will further stress the environment and the public utility infrastructure of this coastal community. With a large brewing company proposed for Big Wave In Moss Beach, what is the projected cumulative impact of these projects on Hwy 1, traffic, the environment and the infrastructure?

Inappropriate / Isolated Location

Moss Beach is isolated, located seven miles in either direction from the nearest town centers of Half Moon Bay and Pacifica. The Sierra Club Loma Prieta chapter has come out against the MidPen project stating: "there could hardly be a much worse location for affordable housing in the urbanized Mid-Coast." This potential development would have a significantly high Vehicle Miles Traveled (VMT) designation, limited walkability, and offers no meaningful public transportation. Lack of access to groceries, jobs, schools, pharmacies, and community-oriented services will make residents dependent on driving, which is a financial burden for affordable housing residents, plus increases traffic problems.

Antiquated Zoning

The outdated zoning for this parcel was completed in 1986 based on plans for a multi-lane Hwy 1 bypass around Devil's Slide, and additional infrastructure that never was, nor will be, carried out due to legislation and the purchase of Rancho Corral de Tierra by POST. This 11-acre parcel should have been rezoned to reflect the revised situation and population projections, but was not. We advocate for a rezoning of this property to more accurately reflect infrastructure constraints and current realities.

- 5) Additional traffic analysis with input from the community should accurately evaluate existing traffic conditions, project traffic impacts and cumulative traffic impacts at Carlos Street, Etheldore Street and California Street.
- 6) The last EIR that was done for this site was completed in 1985. This prior EIR did not consider the impacts of the current sewage failures, nor consider greenhouse gas impacts. In addition, there have been numerous changed circumstances in the intervening period. We request that a new EIR be prepared for the project given these factors and given that the last review was done 32 years ago.
- 7) The current zoning for this site allows for affordable housing on 6 acres leaving approximately 5 acres as open space. We request that MidPen consider scaling back the currently proposed project, in order to have the project better fit with the neighborhood and in recognition of the existing zoning.

Thank you for the opportunity to comment.