

April 15, 2019

Mike Schaller
Senior Planner, County of San Mateo
Planning and Building Department
455 County Center
Redwood City, CA 94063

Re: Cypress Point – Local Coastal Program (LCP) Amendment Re-Submittal

Dear Mr. Schaller:

On behalf of MP Moss Beach Associates, LP, we are pleased to re-submit a request to amend the Local Coastal Program (LCP) for San Mateo County as required for the development of the Cypress Point affordable housing community. Cypress Point is a proposed 71-unit, 100% affordable family development on a 10.875-acre site in Moss Beach that would be the first income-restricted housing for families in the County's Midcoast region.

You provided a letter on September 20, 2018 which collected comments from various State and local agencies in response to the initial submittal. As part of our response to these comments, we are providing updates of the following documents:

- Project Plans: updated site views and site survey
Executive Summary: updated to match the changes made in various documents
- Introduction and Project Description: updated to match the changes made in various documents
- Policy Consistency Evaluation: various updates
- Preliminary Environmental Evaluation Report: updated to include wildfires analysis
- Alternatives Analysis: updated to include energy use and wildfires analysis
- Cumulative Impact: updated to include additional projects in the region
- Aesthetic: updated site views
- Transportation Impact Analysis: various updates
- Energy use report: completed new report

For the updated submittal, we have included the following items:

- Five (5) copies of conceptual design plans
- One (1) copy of any updated environmental technical report and analysis
- One (1) USB drive containing soft copy files of the above

In addition to updating various reports, MidPen has identified individual comments and questions that were included in referral letters and is providing responses as part of this re-submittal. These responses are available starting on page 3 of this document and are organized by the agency that provided each set of comments.



Since the current submittal is a request to amend the LCP, we understand a project-level approval through a Coastal Development Permit cannot be provided until this amendment is approved by San Mateo County and certified by the California Coastal Commission. Therefore, project plans are still preliminary and many questions about the project will be addressed as part of the application and review for the Coastal Development Permit. In our responses we have noted cases where details will be provided at later points in the pre-development process.

Please feel free to contact me with any questions at (650)-235-7675. We look forward to discussing this proposal with you further.

Sincerely,

A handwritten signature in black ink that reads "A. Bielak".

Andrew Bielak

Cypress Point Resubmittal – Response to Comments

California Historical Resources Information System

- *The entire project should be considered sensitive for prehistoric and historic archaeological materials.*
- *We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values*
- *Prior to commencement of project activities, it is recommended that these resources be assessed and recorded on DPR 523 historic resource recordation forms*
- *...It is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of San Mateo County conduct a formal CEQA evaluation*

MidPen will follow all best practices and required procedures under the California Environmental Quality Act (CEQA) to identify any cultural and historic resources and properly mitigate any impacts where necessary.

Midcoast Community Council

- *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.*

The proposed live-work preference for the project will ultimately be determined by San Mateo County. MidPen recognizes the community's interest in having a local live-work preference that would apply to as many units as possible.

- *San Mateo County AMI is significantly higher than what local Coastside jobs provide... Please clarify how the proposed income restrictions would provide a Coastside jobs-housing fit.*

According to the Longitudinal Employer-Household Dynamics (LEHD) program at the U.S. Census Bureau, as of 2015 (most recent year for which data is available) there are 1,364 total jobs in the MidCoast (from Montara to El Granada) and 11,258 jobs in the broader coastal area that includes Half Moon Bay and Pacifica. Of these 11,258 jobs in the region, 68% pay less than \$40,000 per year – which suggests that a significant portion of households with two working adults earn less than \$80,000 per year.

The Cypress Point development will provide opportunities specifically for households in these income ranges who struggle to find affordable living opportunities in the area. The units will be offered for households at a range of income levels, all of which are considered “low-income” or below. For example, based on 2018 San Mateo County income limit, and assuming a household size of four people, some households at Cypress point could earn up to \$44,000/year or less, (30% Area Median Income), some could earn up to \$73,300/year (50% Area Median Income), and a small portion could earn up to \$117,000/year (80% Area Median Income). All households will pay no more than 30% of their annual income on rent.

- *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.*

The housing crisis has created enormous challenges for the Bay Area and is consistently identified as one of the top priorities for residents of the region and the entire State of California. There is currently no income-restricted affordable housing anywhere in the Midcoast region, making the affordable housing challenge particularly acute for residents on the coastside. Considering these challenges, MidPen contends that providing safe, well-designed, high-quality affordable homes is an urgent and badly needed part of the solution. As previously noted, a portion of units will be subject to a live-work preference therefore many residents at Cypress Point may work in the region.

- *Policy 3.16 (a) limits “not building permits, but affordable housing units” to 60 in a 12-month period*

The Consistency Evaluation has been updated accordingly.

- *Other references in this application make no mention of limiting this preference to a portion of units. Please clarify.*

As stated above, San Mateo County will ultimately be responsible for determining the exact number of units that will be subject to the preference. The exact number of units that will be subject to the preference has still not been decided.

- *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.*

MidPen is working collaboratively with SamTrans to identify any opportunities to improve transit in the region. Even though this project is too small to sponsor a shuttle on its own, MidPen will continue to coordinate with SamTrans to identify any improvements to Route 17 and/or 18 to better serve Moss Beach residents.

The updated Transportation Impact Analysis includes a memo that examines the existing transit service in the area.



- *... the Parallel Trail segment in this area must be prioritized and implemented ...*

The Parallel Trail is a potential project under the County's jurisdiction. MidPen is working closely with the County and supports the implementation of pedestrian/bicyclist safety and access improvements.

- *Feasibility of re-routing Carlos to 16th for safer vehicle highway access needs further analysis. [...] It is not sufficient to say it is not feasible due to grading requirements and LOS impact on 16th*

MidPen and its traffic consultant have examined three alternative mitigations to improve the safety and performance of the State Route 1/Carlos Street intersection, which are described in the traffic report. We recognize the County is continuing to examine strategies to improve this intersection through its Connect the Coastsides work and supports the ongoing efforts to develop solutions.

- *Vallemar/Etheldore and Lighthouse/16th – As long as there is lane space on Vallemar [...], 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 [...].*

This recommendation has been removed.

- *MCC and the community are adamantly opposed to any more traffic signals in the Midcoast.*

MidPen recognizes the community's interest in providing practical, cost-effective solutions to improve traffic flow and safety at intersections in the area. The Traffic Impact Analysis does not provide a specific recommendation for a traffic signal or a roundabout at California and State Route 1. A preliminary analysis showed that while installing intersection control (such as a traffic light) at this intersection would ensure a Level of Service (LOS) of B or better, a single-lane roundabout may not improve service sufficiently to meet County standards. Therefore, for traffic modeling purposes we are assuming a traffic signal. However, any improvements would require an Intersection Control Evaluation (ICE) report as part of Caltrans approval process. The ICE would compare signal-control and roundabout alternatives to make a final determination on the appropriate intersection control, and MidPen supports the community, County, and Caltrans working collaboratively to develop the appropriate solution.

- *Project traffic impacts and proposed mitigations are analyzed based on existing LOS standards, whereas the 2016 draft of the long-delayed CTMP [aka Connect the Coastsides] proposes a significant revision of LOS standards.*

MidPen's Traffic Analysis reflects the most up-to-date standards used by the County. Since the Connect the Coastsides document is still in draft form, the Traffic Analysis is using the existing standards.

- *Highway speeds incorrect*

The traffic report has been updated. Please note that the applicable section of State Route 1 has a posted speed limit of 50 miles per hour, which would indicate a design speed of 55 miles per hour, which is the applicable standard for corner sight distance per the Caltrans Highway Design Manual.

- *“The project is within ¼ mile walking distance of the Coastside Market grocery, Mos Beach Park, Farallone View Elementary School, and the Seton Coastside Medical Center”
Correction on the distances*

The Consistency Evaluation has been updated accordingly.

- *... This conflict with PUD-124, #5: “No structure shall exceed two stories or an average height of 25 ft.”*

MidPen proposes to amend the existing PUD for the site.

- *List of Reasonably Foreseeable Projects - [...] the many Midcoast single-family dwellings in the permitting process should be included.*

At the time that the Cumulative Impacts Analysis was prepared, MidPen requested a list of reasonably foreseeable projects from San Mateo County. The projects listed in Table 3 reflect the information provided by the County at that time, which focused on the larger projects proposed. In preparing this revised version of the report, MidPen made another request for reasonably foreseeable projects from the County and from the cities of Pacifica and Half Moon Bay. MidPen has added all projects identified by these jurisdictions with the potential to contribute to cumulative impacts to the table of cumulative projects.

- *Population & Housing Units – [...] El Granada, Princeton, and Miramar should be included.*

Tables 4 and 5 in the Cumulative Impacts Analysis report have been updated to include information for the El Granada Census Designated Place (CDP). The information for unincorporated portions of the MidCoast area in these two tables are from Tables 3-2 (population) and 3-18 (housing units) in the San Mateo County Housing Element 2014-2022. These tables do not include entries for Princeton and Miramar, which are folded into the tables from El Granada, Moss Beach, and Montara

- *Census data for area – Does this include jobs in Princeton and unincorporated Miramar*

Yes, this analysis does include Princeton and Miramar. The Map tool used by the U.S. Census does not contain independent data for these communities and instead includes them in El Granada, Moss Beach, and Montara.

- *Additional soil sampling should be performed [...] to assess the horizontal extent of lead-impacted surface soils.*

Additional soil sampling was already performed and was included in the document entitled "Additional Subsurface Investigation and Water Well Evaluation," which was part of the submittal.

- *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.*

The existing building pads will be assessed for asbestos prior to demolition, and the Site Management Plan will incorporate proper controls if asbestos is identified.

California State Transportation Agency

- *The applicant should further analyze alternatives for improving pedestrian and bicycle access in the area*

We recognize the community's interest in improving pedestrian and bicycle access and safety in the Midcoast. Our project will address any impacts associated with our building and we will continue to work with the County to advocate for key projects such as the Coastal Trail.

- *Please revise the Transit Service part the Existing Conditions section of the July 2018 TIA, which appears to omit or incorrectly locate various SamTrans bus stops [...]*

The Traffic Impact Analysis has been updated to include additional detail regarding transit service in the neighborhood.

- *[...] consider relocating [this transit stop] to a location across from the existing northbound stop at SR1 and 14th and providing a Pedestrian Hybrid Beacon at this location [...]*

Based on current roadway conditions and speed limit on State Route 1, MidPen's traffic consultant does not believe 16th or 14th Street would not be an optimal location for a pedestrian crossing. We understand the County has examined this option and others as part of its Connect the Coastside work and support any efforts to improve pedestrian and bicycle access for the area.

- *The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases.*

The Transportation Impact Analysis documents the impact on pedestrians, bicycles, and transit users and includes a recommendation to connect the Project entrance with nearby sidewalks.

- *There appears to be a discrepancy between the plans shown and the written text [...]. The plans show two detention ponds with 4,600 sf capacity, while the text [...] describes four detention ponds to be utilized with a capacity of 20,000 sf.*

The project description text has been corrected to reflect a bio-retention pond capacity of 6,500 square feet, the current estimate of required capacity. It should be recognized that these calculations are still preliminary, and are expected to be further updated as the project site plan is refined.

- *The proposed movement restrictions require a traffic study that re-assigns the prohibited movements to alternate intersections using peak hour volumes in each scenario. [...] The intersection analysis with the proposed project trip assignments to the SR 1 intersections listed should be provided for all project scenarios for our review and comment: 14th Street ([...] #1); Vallemar Street/Etheldore Street (#6); California Avenue/Wienke Way (#7)*

The Traffic Impact Analysis includes an analysis of secondary impacts from any proposed re-assignment of traffic patterns and an analysis of storage capacity has also been included. The updated Analysis no longer includes a recommendation to restrict movements at Highway 1 & Vallemar Street / Etheldore Street (#6) or Highway 1 & 16th Street (#2).

- *Please provide traffic analysis using Synchro/Simtraffic models and include the level of service (LOS), delays, and 95th percentile queuing from the Simtraffic Model [...].*

The Traffic Impact Analysis does not include microsimulation of queues using SimTraffic because this model is typically developed during the design phase of a project. For a planning level study, industry practice is to use the Synchro outputs.

The model has been updated to include storage capacity.

- *Please clarify the volume of traffic from Wienke Way and provide an Intersection Control Evaluation (ICE) that provides justification for the project-proposed signal-control-intersection as opposed to roundabout intersection control; Carlos Street and California Avenue (#8); and Carlos Street & Etheldore Street.*

MidPen Housing has not completed an Intersection Control Evaluation (ICE) at this point, but we recognize an ICE will be necessary before any final decision is made regarding intersection improvements.

San Mateo County Department of Public Works - Traffic

- *Please provide LOS analysis and results of all movements and not just intersections as a whole, for all study intersections and scenarios.*

Detailed calculations showing the delay and LOS for all movements are included in the appendices. The body of the text presents the overall and critical movement intersection delay/LOS to be consistent with the standards established by the County.

- *Provide all traffic counts and Synchro models electronically. Include all assumptions and changes made to default values in the Synchro models.*

Electronic version of the traffic models are included along with the traffic report.

- *Provide all the appendices to the TIA document along with a detailed site plan.*

The Traffic Impact Analysis has been updated to include all appendices.

This submittal is the first step in the entitlement process as a request for an amendment to the Local Coastal Program (LCP). A project-level approval cannot be provided until the LCP amendment is approved and certified by the California Coastal Commission. Therefore, more detailed site plans are not yet available but will be provided when MidPen applies for the Coastal Development Permit.

- *The proposed turn restrictions as mitigation measures are not acceptable. Provide alternate mitigation measures to address project significant impact at Highway 1 and Vallemar/Etheldore and Highway 1 and 16th.*

The turn restrictions have been removed from the Traffic Impact Analysis as mitigations.

- *The closure of Carlos Street to all motor vehicles other than emergency vehicles is not acceptable as a mitigation measure. Provide other mitigation measure/s to address the project's significant impacts.*

The traffic report includes analysis of three different mitigation measures for the Carlos Street/SR1 intersection, including: (a) closing Carlos Street between State Route 1 and the Project to all but emergency vehicles, (b) connecting Carlos Street with 16th, and (c) grading the east side of SR1 to provide clear side distance. Please see pages 44-46 for additional discussion of these options. We recognize the County is continuing to examine strategies to improve this intersection through its Connect the Coastside work and supports the ongoing efforts to develop solutions.

- *SamTrans bus stop relocation is not a County project. It is up to the applicant to coordinate with SamTrans and provide all necessary approvals from SamTrans to the County for review and consideration before the TIA can be approved. Provide alternate mitigation measure in case SamTrans does not approve the proposed re-routing.*

The updated Traffic Impact Analysis no longer includes a proposed re-routing of the SamTrans Route 17 bus line. Instead, the updated TIA proposes that residents receive materials and guidance directing them to use the bus stop at Etheldore Street and California Street instead of the Carlos Street/State Route 1 stop.

- *Provide documentation that supports the premise that a fully funded project is currently moving forward. Absent an assurance that a fully funded project is in the process of being implemented, the applicant will be responsible for mitigating the project's impacts.*

MidPen has a thorough and fully feasible financing plan for the Cypress Point project. All financing will be in place prior to project construction.

- *If the applicant is proposing any TDM measures as mitigation, the measures need to be clearly defined and calculations shown as how many trips will be reduced by each measure and how that will impact the operations and LOS at the applicable intersection(s). In addition, please provide a monitoring measure to each of the TDM measures proposed and an alternate measure in case the monitoring shows that TDM is not effective as assumed.*

As part of the analysis we have conservatively assumed that the project will not have a reduction in trip generation resulting from TDM measures in order to fully assess the project's impact. Once this project clears the environmental process and receives conditions of approval stipulating a TDM plan is required, a TDM plan can be developed with clearly defined measures and calculations to estimate the potential trip reduction.

San Mateo County Department of Public Works - Civil

- *Project appears to introduce more than 10,000 sq ft of impervious surface so it is subject to C3 stormwater treatment regulations for pollution control, and San Mateo County Stormwater Runoff requirements for flood control. Project proposes to install storm drains on San Carlos Ave: point of discharge is unknown, maintenance of storm drain is unknown, etc.*

The project will comply with Provision C.3, and includes conceptual treatment solutions and preliminary sizing on Sheet C3.0 of the planning submittal. Final Stormwater Management Plans will be submitted for approval as part of the construction document permitting process.

- *Project will require an O&M agreement*

MidPen will follow necessary requirements for establishing an operating and maintenance agreement prior to project construction

- *Project missing topographic and boundary survey sheet with references - please submit*

The project topographic survey has been added to the planning package materials.

- *Provide profile of point of access from Carlos Ave, will also need sight distance analysis shown on the plans to determine if this is the best location for access for this project or if additional mitigation measures are required.*

Conceptual grading of the entrance drive is shown on sheet C1.0 of the Planning package and has considered vertical curves as part of the design. We will provide a detailed profile as part of the future construction document permit package.

- *Provide drainage calculations per county drainage guidelines and per NPDES C3/C6 guidelines*

MidPen has prepared and submitted a hydromodification memo, which confirms County hydromodification requirements will be met. We will provide detailed drainage studies with the construction document permit package.

- *Provide proper BMP show on plans; separate permanent measures from temporary measures on plan.*

The proposed conceptual BMPs, locations, and preliminary sizing are included on sheet C3.0 of the Planning package. Detailed designs and a stormwater control plan will be provided as part of the construction document permit package and Stormwater Management Plan.

California Coastal Commission

- *The Applicant does not discuss the likelihood that Caltrans will issue the necessary encroachment permit. We recommend that the Applicant coordinate early with Caltrans to evaluate the appropriateness and feasibility of these proposed mitigation measures.*

MidPen has participated in multiple meetings with Caltrans and will continue to coordinate closely on the development of mitigation measures. We expect San Mateo County will release an updated Connect the Coastside draft report in 2019 which will various improvements that are key to improving transportation conditions on the coastside. We plan to further assist with planning and implementation efforts between San Mateo County and Caltrans to ensure project traffic mitigations can be advanced.

- *We suggest that the Applicant work closely with the County to increase and improve the availability of public transportation in the area [...] by encouraging SamTrans to expand bus service to and along the Coastside [...]*

MidPen will continue to work with SamTrans and San Mateo County to identify any potential improvements to Route 17 and/or 18 to better serve Moss Beach residents.

- *A discussion or analysis of a proposed project that has fewer than 71 units of housing should be performed to determine if impacts to traffic could be further reduced or avoided.*

The application includes an Alternatives Analysis report that evaluates multiple alternatives to the proposed project and their associated impacts on various issues including transportation. Based on our analysis, a project with a reduced number of units would have a similar traffic impacts, but would be less competitive for tax credit financing and would providing fewer affordable units in the region.

- *The Applicant indicates that there is no need to increase the size of the Montara Water and Sanitary District [...]. Future review of the amendment will need to consider consistency with LCP Policy 1.19 [...].*

The Local Coastal Program requires a reservation of adequate capacity for water and sewer to serve a development significantly larger than the Cypress Point proposal, and the project will not move forward without approval by the Montara Water and Sanitary District (MWSD). As is noted in the Utilities Report provided in MidPen's submittal, the Sewer Authority Midcoast (SAM) has sufficient wastewater treatment capacity to serve the proposed project.

Publicly-available data from the State Water Resources Control Board (available at https://ciwqs.waterboards.ca.gov/ciwqs/readOnly/PublicReportSSOServlet?reportAction=criteria&reportId=sso_main) shows that as of April 2019 neither SAM nor MWSD have had a single Category 1 Sanitary System Overflow since May 2017, and have been below regional averages for Category 2 and Category 3 overflows during that same time period.