



COMMITTEE FOR  
GREEN FOOTHILLS

February 10, 2012

Ken Kirkey, Director of Planning  
ABAG  
P. O. Box 2050  
Oakland, CA 94604-2050

Attn: Jackie Reinhart, Regional Planner

**Re: Application by San Mateo County for Priority Development Area (PDA) status for the Midcoast urban area**

Dear Mr. Kirkey,

Committee for Green Foothills (CGF) has been interested and deeply involved in land use and transportation planning in San Mateo and Santa Clara Counties for the past 49 years. CGF generally supports funding through FOCUS and One Bay Area Grants for Bay Area jurisdictions that are planning for more housing and jobs near transit, consistent with coordinated housing and transportation planning.

However, CGF questions the appropriateness of the proposed designation of the unincorporated Midcoast urban area as a PDA under the Rural Corridor place type. CGF's understanding is that PDAs are areas where there is a local commitment to developing housing along with amenities and services to meet the day-to-day needs of residents in a pedestrian friendly environment served by transit.

The Midcoast area consists of the five small unincorporated communities of Montara, Moss Beach, El Granada, Princeton, and Miramar, and is located entirely within the County's Coastal Zone. The area is comprised primarily of antiquated subdivisions created in the early 1900s, and has significant constraints to new development, including: steep/unstable slopes, geological hazards associated with the active Seal Cove Fault, cliff/bluff retreat along the coast, and low lying areas in Moss Beach, Princeton, Miramar and El Granada that are vulnerable to hazards associated with flooding, tsunamis, and sea level rise. There is inadequate infrastructure, including water, sewer, and highway capacity, to accommodate the planned buildout of the area. All new development must be consistent with the County's Local Coastal Program, (LCP), which was certified in 1980. An Update to the LCP for the Midcoast area has taken 11 years to develop, and is still under review by the California Coastal Commission.

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 appear to meet all of these criteria. Specifically:

Criterion (b), which requires the area to be near existing or planned fixed transit (or served by comparable bus service), appears not to be met, as the Midcoast area has no fixed transit, and has only marginal SAMTRANS bus service. While the criteria for effective bus service for Rural Corridors is unstated, other PDA place types must have at least one route that has minimum 20-minute headways. The SAMTRANS routes serving the Midcoast fall short of this requirement:

- \* Route 17 (Montara to HMB) 90-min interval 8-6 (9-5 Sun); 60-min interval 6- 8 AM weekdays
- \* Route 294 (Pacifica to San Mateo) 90-min interval 8-6 weekdays only

It is notable that even this minimal SAMTRANS service has been difficult to maintain over the past several years due to revenues from ridership not justifying the costs.

Criterion (c), which requires that the area is planned or is planning for more housing, raises several issues as to potential conflicts with the certified County LCP. Housing is the lowest priority land use under the Coastal Act. The vast majority of new housing within the Midcoast area is planned as infill on scattered, already subdivided lots. The area has two designated affordable housing sites, which could accommodate up to 322 units of a combination of market and below market housing. These two sites have not been developed since certification of the LCP in 1980, for various reasons. It is unlikely that more housing can be accommodated beyond what is already planned, particularly since the coastside has a significant surplus of housing compared to jobs, and residents must commute “over the hill” to jobs in San Mateo, Santa Clara, and San Francisco counties.

CGF is particularly concerned about the lack of public participation in the County’s decision to apply for the PDA designation. CGF is on the County list for notification of permit and planning matters within the County’s Coastal Zone. Yet our organization was informed of this Application only four days before the Board of Supervisors meeting of January 31, 2012, when the Agenda was published. The County apparently did not anticipate any public interest, as the Board Resolution was on the Consent calendar. The Application states that the concept of a PDA designation was discussed in 2011 with the Midcoast Community Council, which is advisory to the Board of Supervisors. Yet none of the four members of the MCC who were on the Council during 2011 can recall being informed of the details and implications of the proposal, nor was there any community outreach at that time.

CGF notes that there are existing County funding sources to implement some of the Midcoast pedestrian and bicycle initiatives. For example, 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 the City, San Mateo County has not yet submitted an application for the unincorporated section, despite two calls for project submittals in the past four years.

In conclusion, CGF feels that the proposed designation of the San Mateo County unincorporated Midcoast area as a PDA does not meet the criteria in the Application Guidelines, has not been fully vetted within the affected community, could potentially conflict with the certified LCP, and

therefore is not warranted for consideration at this time. Therefore we respectfully request that ABAG not approve the proposed PDA for the San Mateo County Midcoast.

Thank you for consideration of our views.

Sincerely,

A handwritten signature in black ink that reads "Lennie Roberts". The signature is written in a cursive, slightly slanted style.

Lennie Roberts, San Mateo County Legislative Advocate

cc: 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  
Midcoast Community Council  
Cynthia D'Agosta, Executive Director, Committee for Green Foothills