



October 10, 2022

Manuel Ramirez, Chair and Members of the
San Mateo County Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Item #4 on the October 12, 2022 Agenda: Caltrans Wireless Traffic Operation System in the unincorporated MidCoast; PLN 2022-00009

Dear Chair Ramirez and Commissioners,

On behalf of Green Foothills, I write in strong support of the Staff Recommendation for Denial of the Coastal Development Permit (CDP) for the proposed Variable Message Signs (VMS) and associated infrastructure in the unincorporated Midcoast area.

We agree with the staff's determination that the proposed illuminated message signs would conflict with the Visual Resources policies of the Local Coastal Program (LCP), the Community Design Manual, and the relevant sections of the California Coastal Act.

The San Mateo coast is a unique and precious resource of great significance. Its scenic and visual quality is recognized world-wide, and must be protected from unnecessary degradation.

The Half Moon Bay Planning Commission, at its August 23, 2022 meeting, voted to deny a similar proposed VMS installation at Miramontes Point Road at the southern end of the city.

There are many alternative means by which motorists can obtain current traffic information, including SMC Alert, KCBS news radio, Google Maps, Waze, and other social media. A more suitable place to locate information on traffic conditions in the Half Moon Bay-Midcoast area would be at the junction of Highway 92 and Lower Skyline Boulevard, where motorists would have the ability to take alternative routes, and if necessary, avoid the Half Moon Bay-Midcoast area entirely.

Please deny the CDP for the proposed Variable Message Signs.

Sincerely,

Lennie Roberts, Legislative Advocate

cc: Michael Schaller, Project Planner
Alice Kaufman, Green Foothills Advocacy Director



October 10, 2022

Manuel Ramirez, Chair and Members of the
San Mateo County Planning Commission
455 County Center, 2nd Floor
Redwood City, CA 94063

Re: Item #5 on the October 12, 2022 Agenda: Local Coastal Program Map and Text Amendments to facilitate construction of a replacement Fire Station for the Rural Service Center of Pescadero, and to enable a water line extension to serve the replacement Fire Station and the existing Pescadero Middle/High School; File Number PLN2021-00056

Dear Chair Ramirez and Commissioners,

On behalf of Green Foothills, I write in support of the Staff Recommendation to amend the Local Coastal Program (LCP) and enable the extension of a water line to provide potable water to the Pescadero Middle/High School and the relocation of the Pescadero Fire Station.

The Staff Report details the long-standing need for potable water for the Pescadero Middle/High School, and the urgent need to relocate the Fire Station. We commend the County for the many efforts to resolve these two challenges in a way that also complies with the Coastal Act and LCP.

We note that the Staff Report does not make any reference to Measure A, the Coastal Protection Initiative, approved in 1986 by a 63% majority vote county-wide. Measure A voters enacted some 37 policies of the County Local Coastal Program, and mandated that these policies may not be weakened or discarded without a county-wide vote. We believe that the proposed LCP Map and Text Amendments do not trigger the need for a county-wide vote due to the careful wording of LCP Policy 2.39 Service Area Boundary that limits water connections to uses within the boundary of the rural service center and the essential services provided by fire protection facilities and public schools.

However, to correctly describe the unincorporated community of Pescadero, we recommend that the proposed new Policy 2.80 be changed to reference the Pescadero Rural Service Center, instead of the Town of Pescadero.

We also note that the Staff Report and Resolution attached to the Staff Report only references the Land Use Plan and 2 Map Amendments (Land Use (Pescadero) and Land Use (South Coast)); we wonder whether there is also a need to amend the LCP Zoning Map for the Middle/High School Site to appropriately recognize the existing and proposed institutional uses there?

We look forward to working with San Mateo County Planning, LAFCo, and the California Coastal Commission to enable this project to move forward.



Thank you for considering our comments.

Sincerely,

Lennie Roberts, Legislative Advocate

cc: Michael Schaller, Project Planner
Erik Martinez, Coastal Planner, California Coastal Commission
Alice Kaufman, Advocacy Director, Green Foothills



October 11th, 2022

REGARDING PLN #2022-00009 CALTRANS

Commissioners,

I am writing to **Oppose** the VMS system on the rural San Mateo County Coastside starting at the Clarinada Exit in Daly City to Miramontes Point Road Intersection (Half Moon Bay).

I particularly detest the idea of mounted Digital Signage and Midwest Guardrail Systems, and especially the accompanying paved Maintenance Vehicle Pullouts so that a CalTrans truck

can park to do periodic maintenance. I do **not** object to the proposed Wireless Detection Systems.

The digital signs and Midwest Guardrail Systems plus paved Maintenance Pull-outs are a visual blight to our rural Coastal ambiance.

Money would be better spent on these signs along Hwy 92 East and West, where a need exists for a system alerting visiting tourists and residents of road closures or incidents that will cause delays.

The seemingly continuous closures on Hwy 92 (BOTH EAST & WEST BOUND) are all too common, nearly any day of the week there are accidents, or delays such as: Pumpkin Traffic, Christmas Tree Farm Visitors and various delay-producing events such as a recent Mavericks Festival at the Harbor, the Mid October Pumpkin Festival, the Winter Mavericks Surf Contest not to mention past events (Dream Machines) that took place in April (pre-Covid) at the Eddie Andreini Air Field formerly called The Half Moon Bay Airport. A majority of these events draw visitors who must traverse the twisty road which is Hwy 92.

Money would also be better spent improving the Moss Beach section of Highway One where a Round-a-Bout at Cypress and Highway One has been studied and promised for nearly two decades. Last Wednesday, a community member lost his life while riding his bicycle on the Eastern shoulder of the road. I have been attending "Meetings and Study sessions" for two decades regarding that section of Highway. Yet, still no safety improvements (but for a controversial Crosswalk) have been enacted to date. And, that section of Highway has only ONE streetlight throughout the entire Moss Beach Corridor, while Montara has 6-7 (albeit some with burned-out light bulbs) however, Montara's business district is located on only one side of the Highway (on the East side.) While Moss Beach has businesses and Attractions on both sides.

As part of the ORIGINAL Big Wave Development Agreement with the County, they were supposed to pay to fund the Improvements at Cypress but, in 2017, the County permitted the Developer to proceed with his building plans without funding the Round-a-bout or a signal at that intersection which continues to be Level of Service F (LOS F is the worst delay).

For my friend Harald Herrmann, he will never see the “Safety and Mobility Improvements” that are continuously studied but NEVER Funded.

Virtual Message Signs are a waste of money when residents are losing their lives on Highway One within the unimproved Moss Beach Corridor.

Sincerely,

Carlisle Ann Young

180 San Lucas Avenue

Moss Beach, CA 94038

Moss Beach Resident since 1988

From: [Mike Ferreira](#)
To: [Janneth Lujan](#)
Cc: [Barbara Kelsey](#); [James Eggers](#); [Gladwyn d'Souza](#)
Subject: Re: October 12, 2022 Planning Commission Agenda Item 4: PLN 2022-00009
Date: Monday, October 10, 2022 6:13:49 PM

CAUTION: This email originated from outside of San Mateo County. Unless you recognize the sender's email address and know the content is safe, do not click links, open attachments or reply.

Dear Planning Commission Chair Ramirez and Commissioners,

On behalf of the Sierra Club Loma Prieta Chapter I wish to express our concurrence with the staff report's recommendation for denial of the above referenced Coastal Development Permit. In particular we are opposed to the project's glaring inconsistency with the San Mateo County Local Coastal Program's Visual Resources policies, said policies being intended to preserve the rural charm of the San Mateo County coastline for the aesthetic benefit of visiting Californians.

The applicant's proposal for wireless electronic signs on Highway 1 may be well meaning in that it reflects other projects in inland areas but the San Mateo County coastline needs to be viewed in the context of the more protective policies of the San Mateo County Local Coastal Program.

We close in appreciation of the San Mateo County Planning Department staff report's assertion of inconsistency and we urge the Commission's support for the staff recommendation for denial.

Best Regards,

Mike Ferreira
Executive Committee
Sierra Club Loma Prieta Chapter



Midpeninsula Regional
OpenSpace

Midpeninsula Regional Open Space District

GENERAL MANAGER
Ana M. Ruiz

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October 11, 2022

Mr. Steve Monowitz, Community Development Director
County Planning Commission, County of San Mateo
400 County Center
Redwood City, CA 94063

SENT VIA E-MAIL TO: smonowitz@smcgov.org and jlujan@smcgov.org

Subject: San Mateo County's Draft Updated 2023-2031 Housing Element of the County General Plan

Dear Mr. Monowitz and County Planning Commissioners:

On behalf of the Midpeninsula Regional Open Space District (Midpen), we respectfully submit the following comments regarding the County of San Mateo (County) draft Updated 2023-2031 Housing Element. Midpen has been following the draft Updated Housing Element process and appreciates the County's collaborative public engagement process. Moreover, Midpen values the County acknowledging that, "...housing shortages in urbanized areas throughout the region have contributed to sprawling and inefficient development patterns, loss of open space and damage to natural resources, and increasingly long worker commutes with concomitant increased automobile traffic, greenhouse gas emissions, and contributions to climate change."

With over 65,000 acres of acquired and protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California. Our braided mission is to acquire and preserve in perpetuity open space and agricultural land of regional significance, to protect and restore the natural environment, to preserve rural character and encourage viable agricultural use of land resources, and to provide opportunities for ecologically sensitive public enjoyment and education.

While much of Midpen's open space lands in our regional greenbelt lie along the ridge of the Santa Cruz Mountains, Midpen owns and manages several open space preserves in the unincorporated skyline and coastal areas of San Mateo County. These preserves include Miramontes Ridge, Purisima Creek Redwoods, La Honda Creek, and El Corte de Madera Creek Open Space Preserves, among others, making Midpen the second largest landowner in San Mateo County with almost 32,000 acres protected and managed within the County's boundaries.

In accordance with the Metropolitan Transportation Commission's adopted *Plan Bay Area 2050*, per SB 375 (2008, Steinberg), a critical regional goal is to reduce greenhouse gas emissions by focusing housing near jobs and transit. However, at the same time, the 6th cycle of the Regional Housing Needs Allocation (RHNA) process has increased the County's housing allocation by over 200% from the last RHNA cycle. We recognize the County's challenge in finding adequate viable sites to meet the allocation requirement of 2,833 units while remaining consistent with County General Plan policies to curtail sprawl by implementing strategies that encourage infill construction within the existing urban footprint. Since 2020, Midpen has been tracking the current RHNA process and advocating for drastic reductions in allocations to unincorporated counties where the vast acreage of available natural and agricultural lands with the goal of avoiding the situation the County is faced with today (see Attachments 1 and 2).

Among the six goals presented in the draft Updated Housing Element, Midpen is encouraged by two specific housing goals: (1) to promote sustainable communities through regional coordination efforts and locating housing near employment, transportation and services, and (2) to require or encourage energy efficiency, resource conservation and climate resiliency design in new and existing housing as the County considers how best to address the region's housing needs. We understand these environmentally conscious goals support the County's adopted Share Vision where, "[o]ur natural resources are preserved through environmental stewardship, reducing our carbon emissions, and using energy, water and land more efficiently."

Based on the Housing Sites Inventory presented in the draft updated Housing Element, we would like to share specific considerations to addressing the County's environmental stewardship goals.

In reviewing the draft document, a large number of sites that have been identified as potential housing sites pose significant concerns regarding (1) impacts to high conservation value areas as defined by Conservation Lands Network, (2) increasing the number of homes in *very high* to *high* fire severity zones, and (3) encroaching further into the wildland urban interface area (WUI). These sites include:

- ***Vacant single family residential sites along Higgins Canyon Road*** (APNs: 066210190, 066121010, and 066140090). These properties, with Open Space Land Use designation, are located in either *Very High* or *High* Fire Severity Zones and within the WUI adjacent to Purisima Creek Redwoods preserve. (See Exhibit A)
- ***Vacant single family residential sites along Bear Gulch Road*** (APN: 072343130) and on Highway 35 (APNs: 072332060 and 072332210). These properties, with Open Space Land Use designation, are located in either *Very High* or *High* Fire Severity Zone and within the WUI adjacent to El Corte de Madera and La Honda Creek preserves. APN 072343130 is also located in an area deemed as *Essential Habitat* by the regional Conservations Lands Network described below. (See Exhibit B)

- **A vacant highway and street site and multiple vacant sites designated as open space along Highway 84** (APNs: 078021010, 075322020, 075310030, 078300060, 078140100, 078220050, 078190130) These properties are located in *Very High* (fully or partially) or *High* Fire Severity Zone. In addition, APNs 078220050 and 078190130 are located in areas deemed as *Essential Habitat* by the Conservation Lands Network. (See Exhibit C)
- **A vacant site (3200 BARRANCA KNOLLS DR) currently wooded and used for timber along Gazos Creek Road** (APN: 089180090) Located in a *Very High* Fire Severity Zone (VHFHSZ), this site, with Open Space Land Use designation, falls within the footprint of the 2020 CZU Lightning Complex fire, which experienced significant fire damage. In addition, the property is located in an area deemed as *Essential Habitat* by the Conservation Lands Network. (See Exhibit D)

As part of the County’s site selection criteria, we recommend that the following environmental factors be taken into consideration for the above-mentioned sites and other sites located in rural, unincorporated areas.

Environmental Factor: Conservation Values

As identified in Midpen’s Conservation Atlas Map, there are lands located in southern San Mateo County with high conservation values. (See Attachment 3 for Midpen’s Conservation Atlas Map). These areas are also designated as *Essential Habitat* by the regional Conservation Lands Network¹ due to their significant conservation value and contribution to interconnected landscapes that are critical to safeguarding healthy, climate resilient ecosystems. Although intensified development may be necessary to meet regional housing needs, increased human activity — particularly from light, noise, and chemical applications (such as rodenticides)— is known to negatively harm proximate ecological systems. As such, care must be taken to ensure the pattern of development considers the vital role of natural and agricultural lands in sustaining our society, as well as the ecological systems that depend on them. Statutorily, the County is obligated to take this into account. Government Code Section 65584(d)(2) clearly states:

*The regional housing needs allocation plan shall further all of the following objectives: Promoting infill development and socioeconomic equity, **the protection of environmental and agricultural resources**, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

Environmental Factor: Wildfire Threat

As evidenced by the 2020 CZU Lightning Complex Fire, the damage caused by catastrophic wildfire can be devastating to both communities and the natural environment. The approximately 86,500-acre fire destroyed 1,490 buildings, many of which were in San Mateo County. It also burned in both Butano and Big Basin Redwoods State Parks, where a number of historic buildings were destroyed, including the visitor center at Big Basin State

¹ <https://www.bayarealands.org/wp-content/uploads/2019/10/CLN%202.0%20Final%20Report.Web.pdf>

Park. While this CZU fire ignited due to natural causes, according to the National Parks Service, “Nearly 85 percent of wildland fires in the United States are caused by humans.”² Zoning for additional residences in these high-fire and very high-fire areas only increases the risk and may force costly upgrades to rural roads and infrastructure. The Board of Forestry recently adopted revisions to their State Minimum Fire Safe Regulations in May 2022, setting certain minimum standards for structures, subdivisions and developments in State Responsibility Area (SRA) and LRA VHFHSZ and providing for basic emergency access and perimeter wildfire protection, as well as standards for fuel breaks, greenbelts, and measures to protect undeveloped ridgelines. In addition, California Attorney General Rob Bonta recently issued guidance with best practices and mitigation measures for local governments considering approval of development projects in fire-prone areas³. He stated that,

“Residential developments in the wildland-urban interface and other wildfire prone areas can significantly increase the risks of wildfires and the related risk to public safety. Introducing more people via additional development increases the likelihood of fire ignition, which may then develop into a wildfire. Building housing in the wildland-urban interface also puts more people in harm’s way, and may hinder evacuation routes and emergency access.”

We recommend concentrating development – through increased building heights and densities - in more urbanized areas, which have greater access to water and transportation infrastructure. We appreciate the County adopting new high-density residential zoning of up to 120 units/acre in proximity to transit within the North Fair Oaks community. Prioritizing housing in urban, transit-connected areas is in line with fundamental smart growth principles and consistent with the goals of SB 375.

The draft Housing Element discusses how the County should “...[c]ontinue County Participation in and Facilitation of Inter-Jurisdictional and Cross-Sectoral Collaborations for housing planning and development.” As a regional open space district, Midpen welcomes working with the County on supporting new housing policies that ensure the protection of open space lands and natural resources and meet the goals of reducing vehicle miles traveled/greenhouse gas emissions to promote climate resiliency.

For many decades, Midpen has regarded the County of San Mateo as a strong partner in protecting open space and agricultural resources and preserving the region’s environmental values and unique biodiversity. We urge the County to reconsider the above-mentioned housing sites and others that pose serious environmental and safety concerns and further accelerates impacts to the WUI.

² <https://www.nps.gov/articles/wildfire-causes-and-evaluation.htm#:~:text=Humans%20and%20Wildfire,and%20intentional%20acts%20of%20arson.>

³ <https://oag.ca.gov/news/press-releases/attorney-general-bonta-issues-guidance-local-governments-mitigate-wildfire-risk>, October 10, 2022

Thank you for your consideration of these comments, and we welcome further discussions with the County, where we may be able to help with environmentally sustainable revisions to the Draft Updated Housing Element to balance the needs of the built environment and the protection of natural and working lands. Please direct questions to Jane Mark, AICP, Planning Manager, jmark@openspace.org.

Sincerely,

A handwritten signature in black ink that reads "Ana M. Ruiz". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Ana M. Ruiz
General Manager

CC:

Midpeninsula Regional Open Space District Board of Directors
Susanna Chan, Assistant General Manager, Midpeninsula Regional Open Space District
Jane Mark, AICP, Planning Manager, Midpeninsula Regional Open Space District
William Gibson, Planner, San Mateo County Planning Department

Attachments

1. Midpen letter to Association of Bay Area Governments regarding high RHNA allocations to unincorporated counties dated October 15, 2020
2. Midpen joint letter to Association of Bay Area Governments regarding high RHNA allocations to unincorporated counties dated January 21, 2021
3. Midpen's Conservation Atlas Combined Conservation Values Map (2014)

Exhibit A. Proposed Housing Sites along Higgins Canyon Road (adjacent to Lower Purisima Creek Redwoods Preserve)

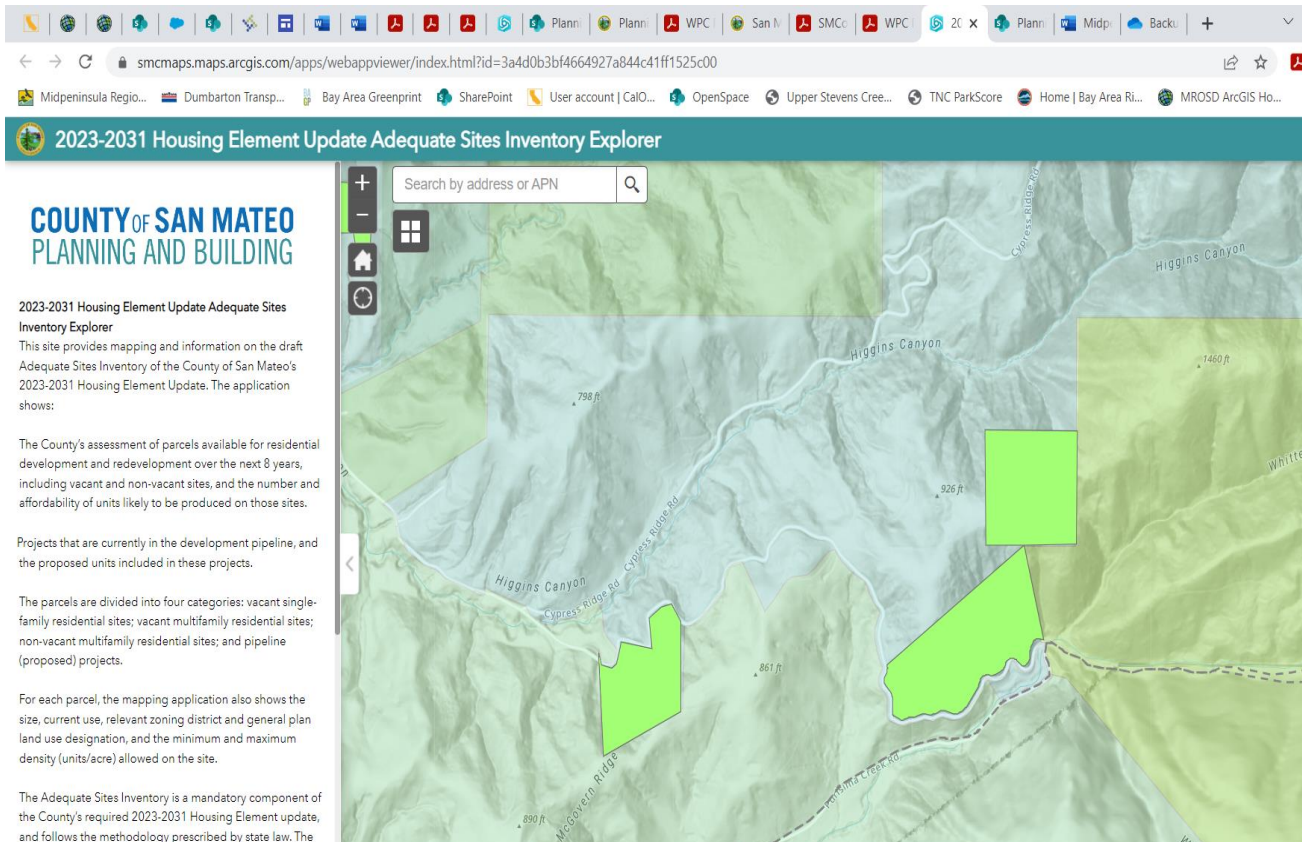


Exhibit B. Proposed Housing Sites along Highway 35 and Bear Gulch Road (adjacent to El Corte de Madera and La Honda Creek Preserves)

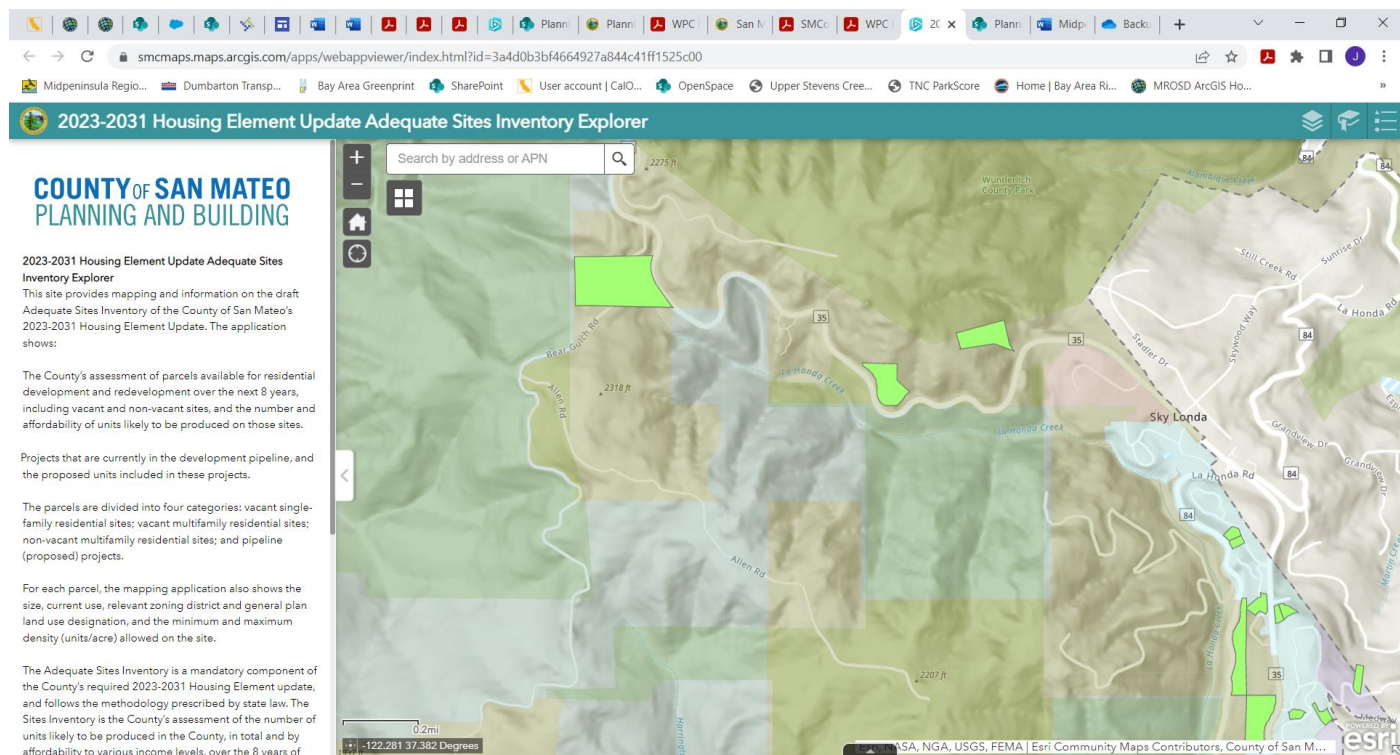


Exhibit C. Proposed Housing Sites along Highway 84 (adjacent to La Honda Creek preserve)

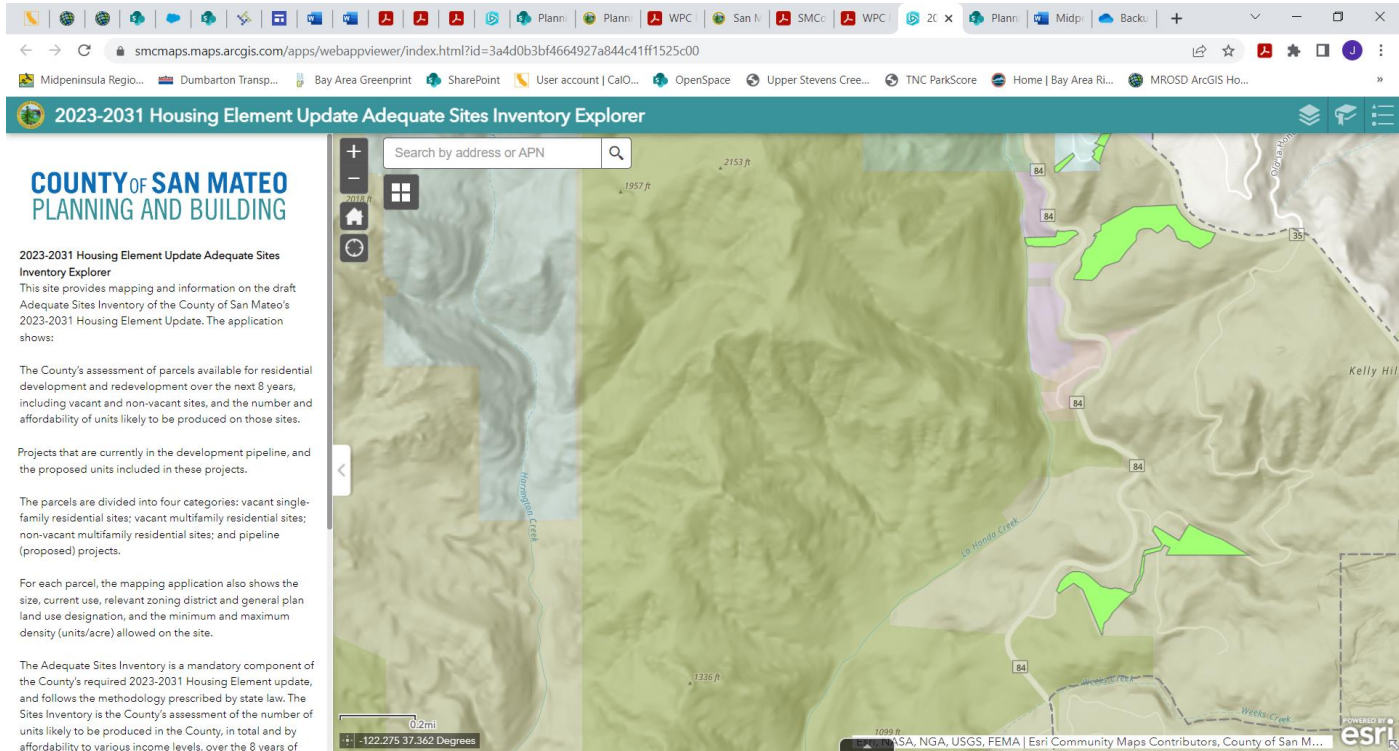
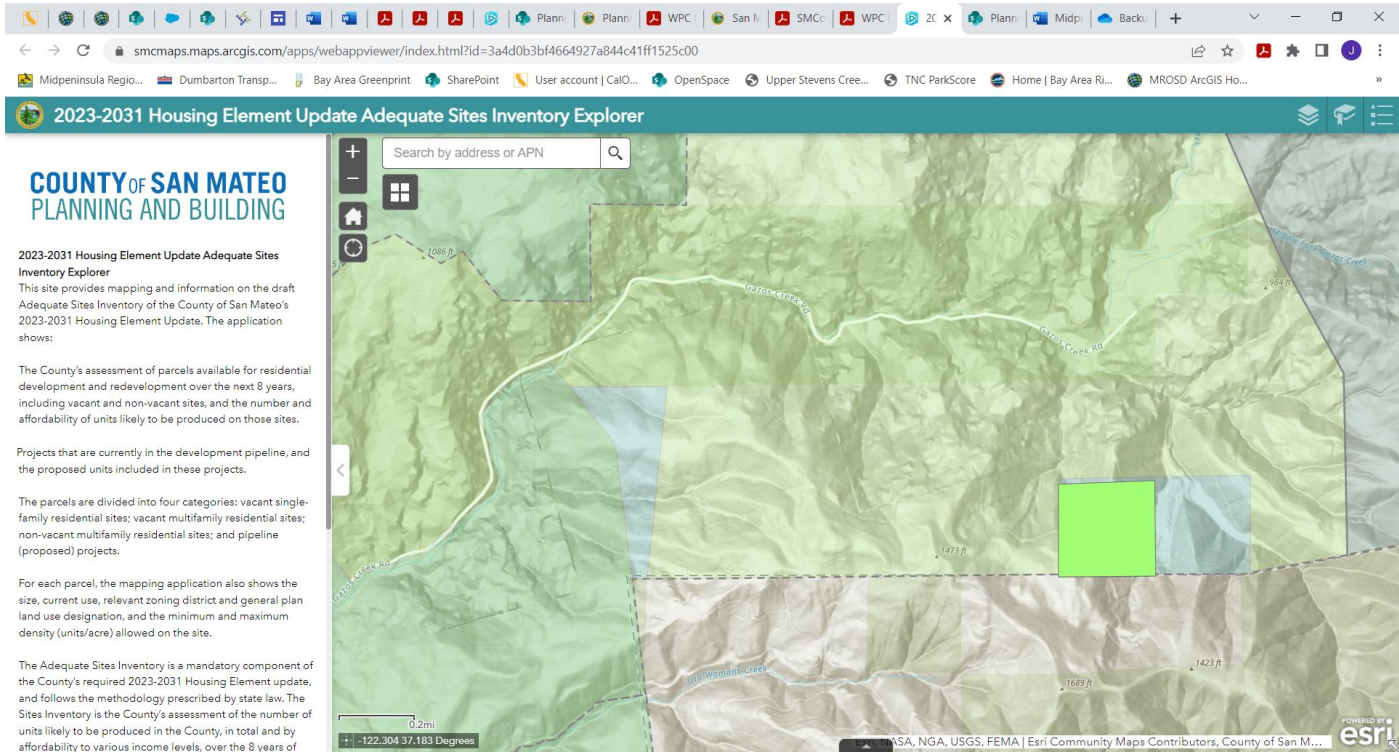


Exhibit D. Proposed Housing Site along Gazos Creek Road (adjacent to Ano Nuevo and Butano State Parks)





Midpeninsula Regional
OpenSpace

Midpeninsula Regional Open Space District

GENERAL MANAGER
Ana M. Ruiz

BOARD OF DIRECTORS
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Yoriko Kishimoto
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Curt Riffle
Karen Holman
Larry Hassett
Zoe Kersteen-Tucker

October 15, 2020

Jesse Arreguin, President, ABAG Board of Directors
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Regional Housing Needs Allocation – Recommended Methodology and its Impacts to Open Space and Biodiversity Values, Increased Wildfire Risk, Loss of Habitat, and Barrier for Wildlife Corridors

Dear Director Arreguin:

On behalf of the **Midpeninsula Regional Open Space District (Midpen)**, I am writing to provide feedback on the Regional Housing Needs Allocation (RHNA) 6 housing methodology recommended by the ABAG Housing Methodology Committee – Option 8A. Preserving to date nearly 65,000 acres of protected open space on the San Francisco Peninsula, Midpen is one of the largest regional open space districts in California. Midpen spans most of San Mateo County, western Santa Clara County, and the northern reaches of Santa Cruz County. Our mission throughout our jurisdiction is to acquire and preserve a regional greenbelt of open space land in perpetuity, protect and restore the natural environment, and provide opportunities for ecologically sensitive public enjoyment and education, as well as to preserve agricultural land of regional significance, preserve rural character, and encourage viable agricultural use of land resources on the San Mateo County Coast.

Since its first adoption in 2013, Plan Bay Area has served as the urban growth blueprint for the Bay Area, focusing regional growth around transportation infrastructure through its Priority Development Area (PDA) program with a goal for equitable outcomes to all Bay Area residents. Its Priority Conservation Area (PCA) program has created avenues to enhance regionally significant natural landscapes and habitats that surround the built environment as a respite for the densification of PDAs. These Priority Conservation Areas also provide critical ecosystem services to support denser urban and suburban areas that recharge groundwater aquifers, uptake millions of tons of carbon from the atmosphere while producing oxygen, reduce downstream flooding risk, maintain clean fresh water within creeks and waterways, support local food production, and protect sensitive/rare/endemic plants and wildlife including key pollinators. The vision set out by Plan Bay Area is one that seeks balance between growth in the built environment and the vital resources and services provided by our natural and working lands.

While we appreciate the need to continuously evaluate housing needs and further refine Plan Bay Area to better meet the goals of SB 375 (Steinberg, 2009), our sharp concern lies with the housing allocation methodology recommended by the Housing Methodology Committee. **Specifically, we**

wish to raise a deep concern about the enormous increase of housing allocations to unincorporated counties and rural, open space areas. In unincorporated Santa Clara County alone, the allocation of housing units increased from 277 units in RHNA 5 to 4,137 for RHNA 6 – a 1,393% increase. San Mateo County is also seeing a significant increase (913 to 2,933). Our understanding is that other unincorporated counties and rural open space areas around the Bay Area are being allocated similar drastic increases too. We are concerned that such high allocations for primarily rural, agricultural, and open space areas will significantly increase pressure to zone for housing in areas that are at severe risk for fire, impact PCAs, and impact critical habitat linkages that are essential for the sustainability and resiliency of our local biodiversity. Additionally, the proximity to existing PCAs (Attachment 1) raises a host of issues, including loss of habitat connectivity and increased habitat fragmentation, increased wildlife exposure to rodenticides and other hazardous chemicals, increased risk of catastrophic fire and fire ignition sources with severe impacts to both people and natural resources, and loss of scenic landscapes and backdrops that are characteristic and emblematic of the natural beauty that surrounds the Bay Area (Attachments 2, 3, 4).

With the latest megafires in August and September of 2020 serves as a backdrop, the potential for wildland-fire-generated embers that can be carried by winds for miles is well documented. Homes in and near the Wildland-Urban Interface (WUI) (Attachment 5) are at particular risk even with defensible spaces and home hardening measures. In fact, a 2017 insurance analysis shows that almost 350,000 homes in the Bay Area are already located in areas at high or extreme risk of wildfire.¹ Increased, concentrated development in the WUI, incentivized by the pressure of high RHNA allocations, will likely increase wildland fire risk even further – exacerbating the month-long air quality impacts that have affected every single Bay Area resident and negating all the greenhouse gas reduction achievements gained annually by the State of California.

For all of the reasons stated, we recommend that the housing methodology, Option 8A, considered for adoption by the ABAG Executive Board be revised to remain consistent with climate action goals and priority conservation strategies that lie at the heart of Plan Bay Area, are part of state and local jurisdiction goals, and further heightened with Governor Newsom’s recent 30 x 30 executive order issued on October 7, 2020.

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,



Ana M. Ruiz
General Manager

Attachments:

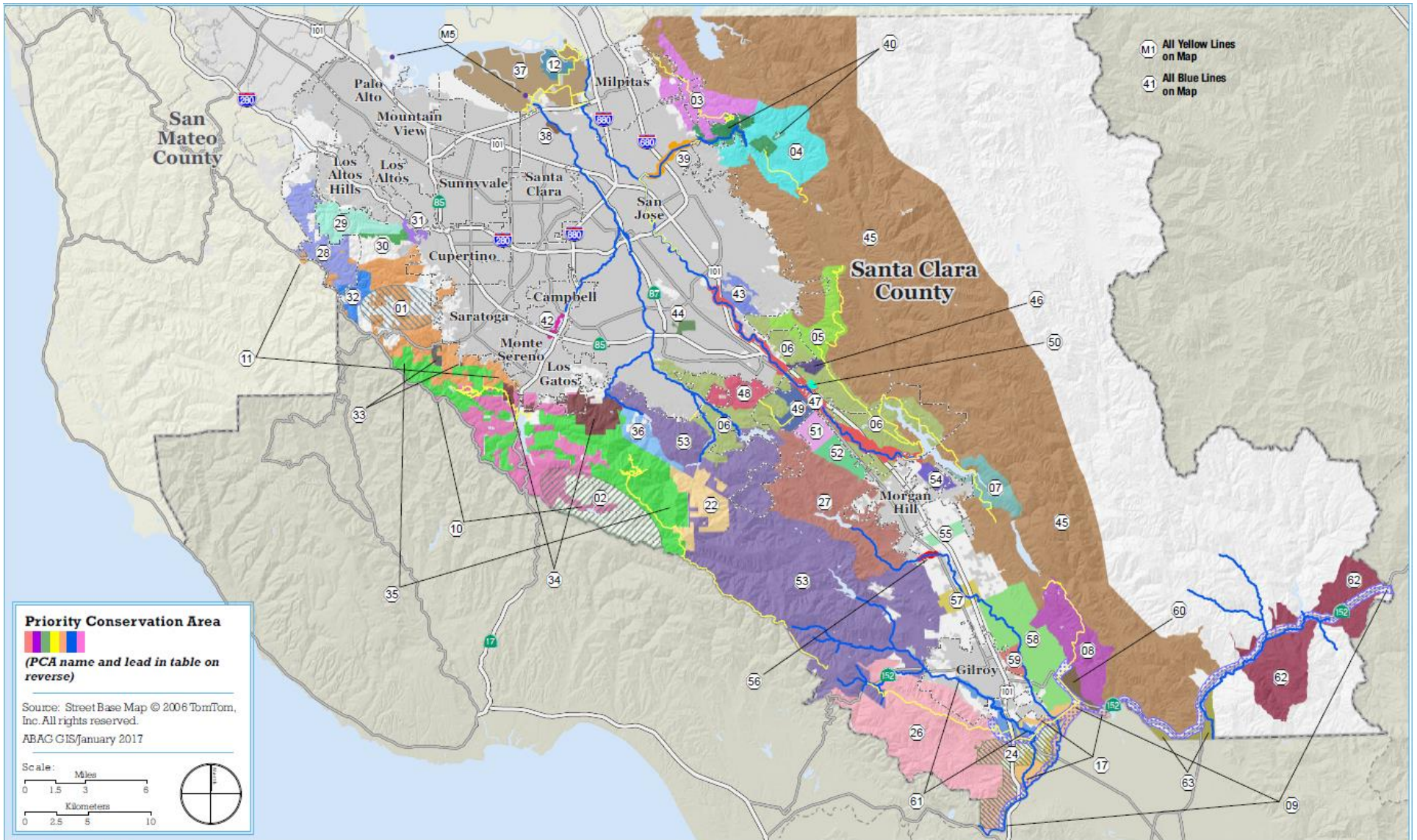
1. Santa Clara County PCA Map (ABAG)

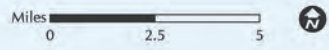
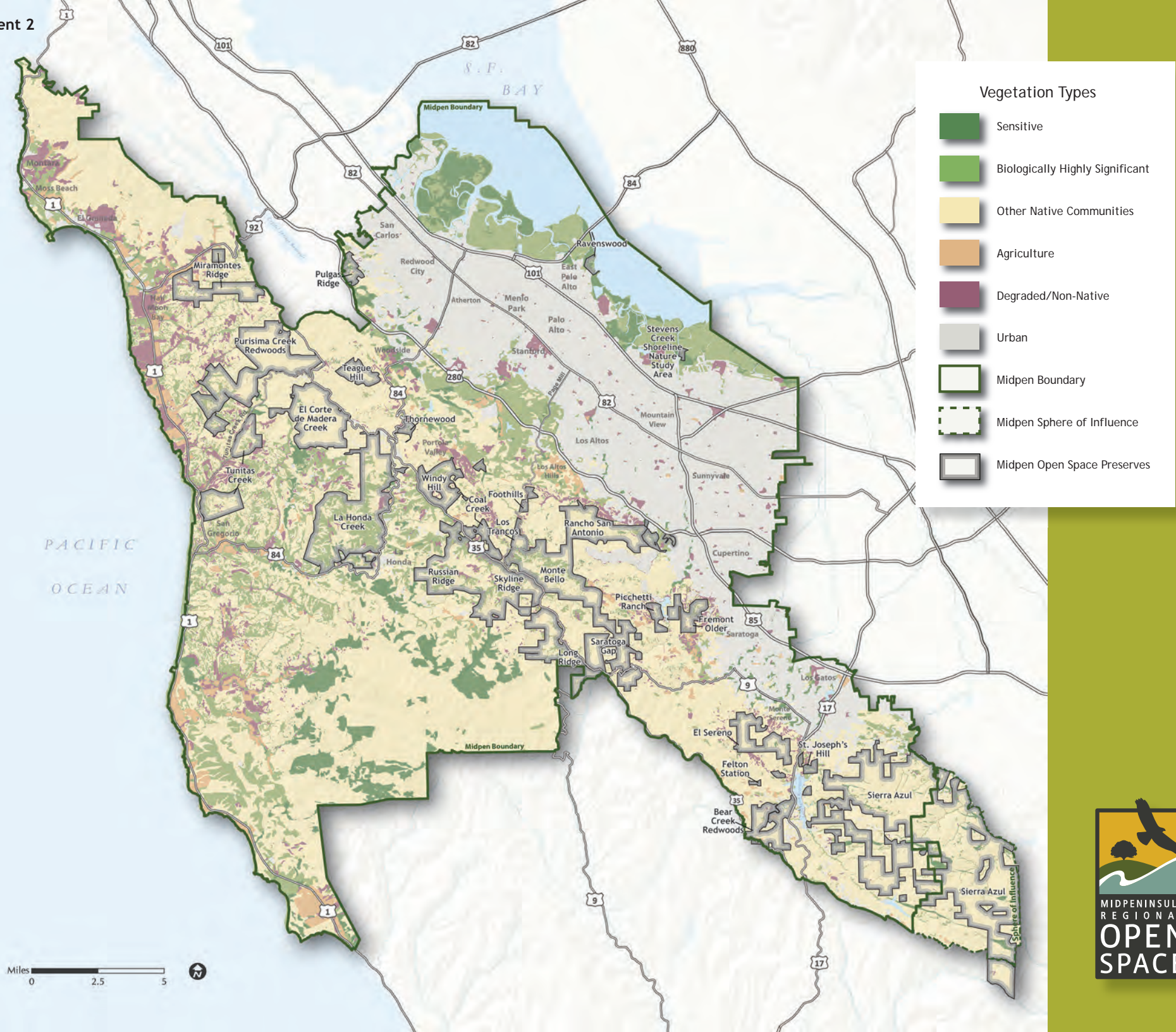
¹ <https://www.sacbee.com/news/california/fires/article216076320.html>

2. MROSD Sensitive Vegetation Map
3. MROSD Rare and Threatened Species Map
4. MROSD Habitat Linkages and Patches Map
5. High Resource Areas and Wildland-Urban Interface Map (MROSD)

.cc:

MROSD Board of Directors
Honorable Senator Jerry Hill
Honorable Senator Jim Beall
Honorable Assemblymember Marc Berman
Honorable Assemblymember Kevin Mullin
Honorable Assemblymember Mark Stone
Santa Clara County Board of Supervisors
San Mateo County Board of Supervisors



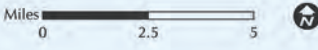
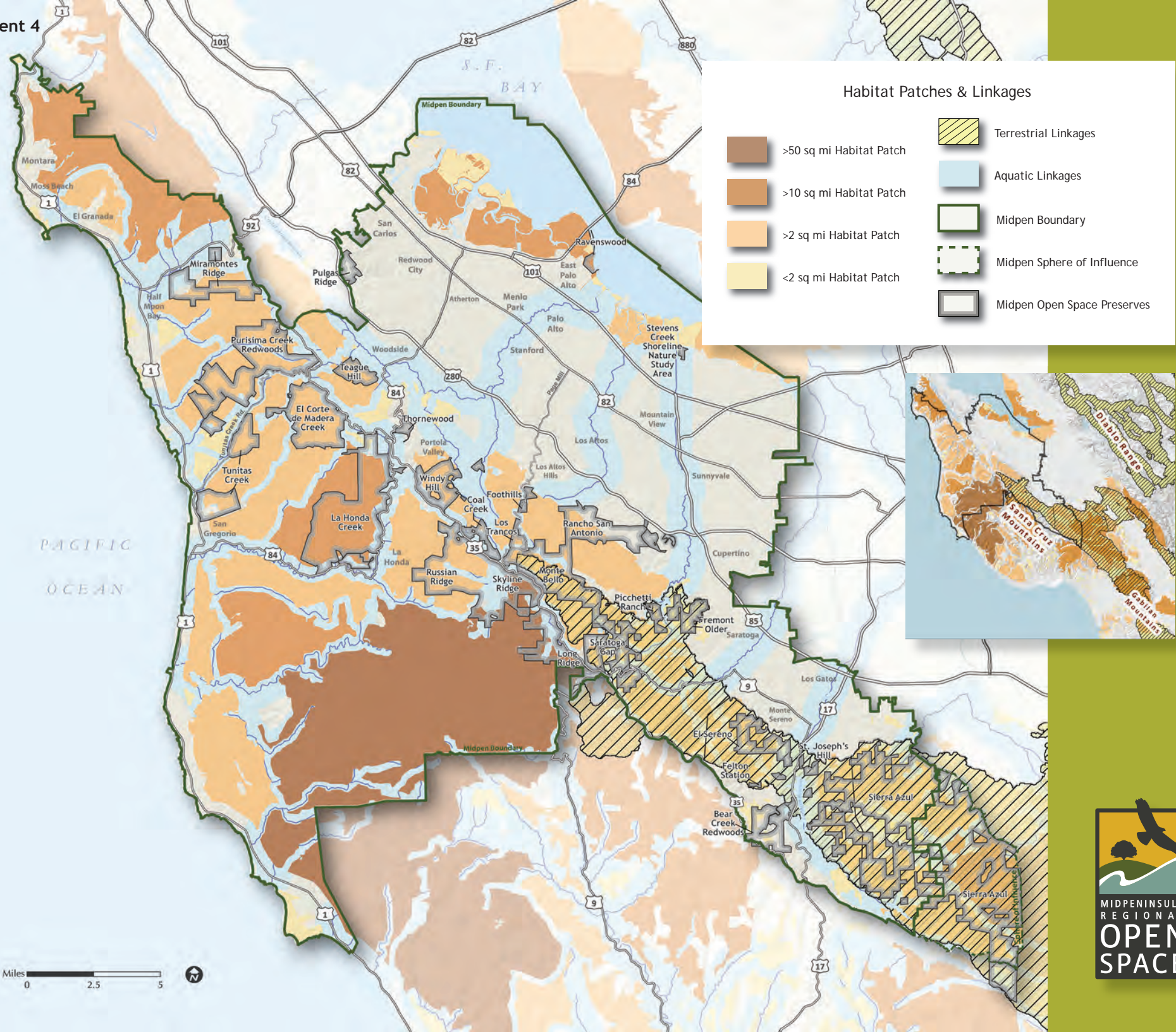




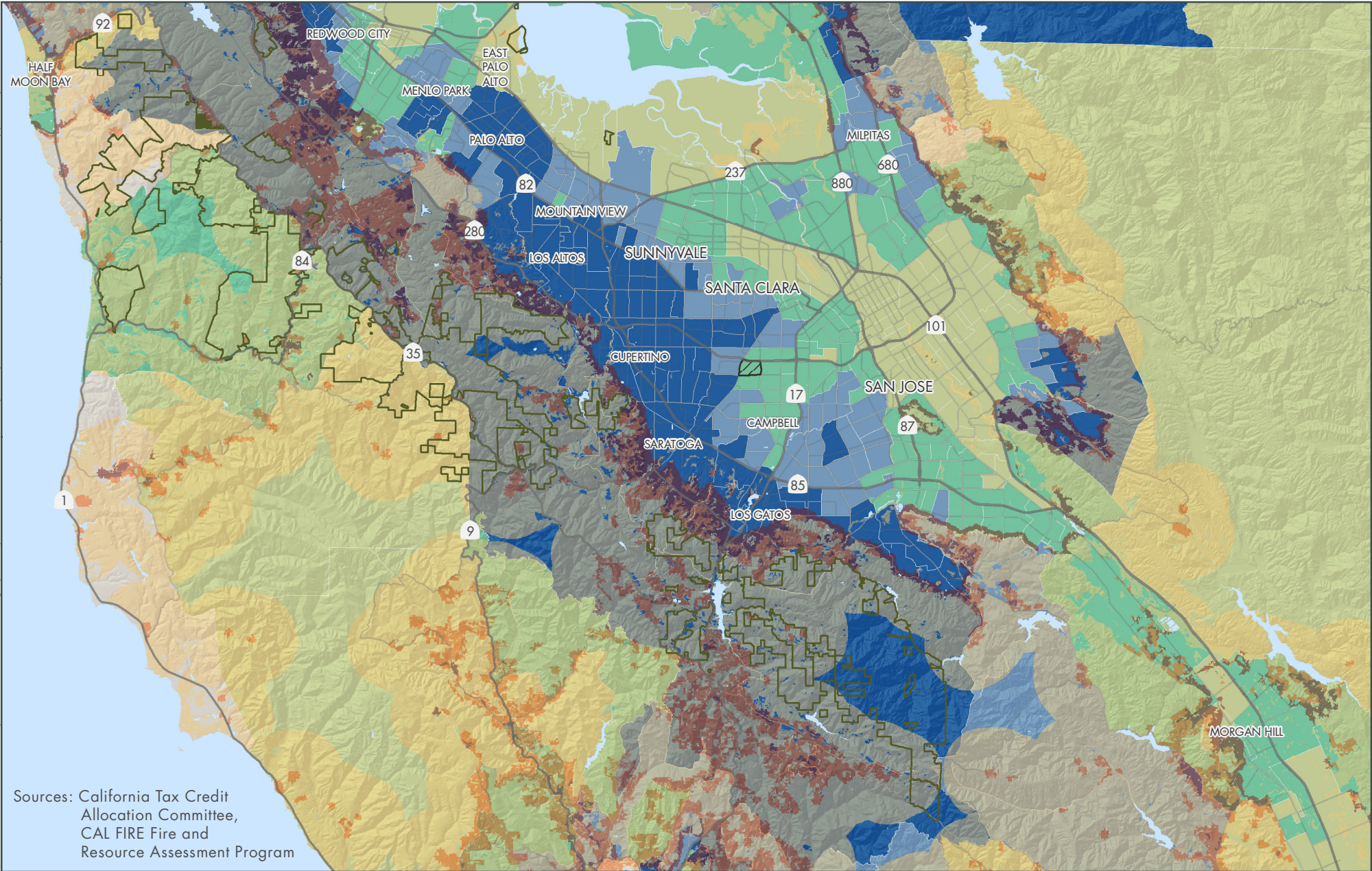
Rare and Threatened Species

- Plant species
- Animal Species
- Streams
- County Boundary
















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Sources: California Tax Credit Allocation Committee, CAL FIRE Fire and Resource Assessment Program

TCAC/HCD Opportunity Areas

Opportunity	 Highest resource	 Low resource	FRAP WUI	 Midpen preserves
	 High resource	 High segregation & poverty		 Influence zone
	 Moderate, resource (rapidly changing)	 Missing or insufficient data		 Intermix
	 Moderate resource			 Interface

Midpeninsula Regional Open Space District
(Midpen)
10/9/2020



Created By: ngreig

While the District strives to use the best available digital data, these data do not represent a legal survey and are merely a graphic illustration of geographic features.



January 21, 2021

Mayor Jesse Arreguin, President Executive Board
 Association of Bay Area Governments (ABAG)
 375 Beale Street, Suite 700
 San Francisco, CA 94105

Submitted via email to RHNA@bayareametro.gov

Re: Proposed RHNA Methodology and Subregional Shares – Continuing Concern Regarding Overallocation to Unincorporated Counties

Dear President Arreguin and ABAG Executive Board,

On behalf of the Midpeninsula Regional Open Space District (Midpen) and Santa Clara Valley Open Space Authority (Authority), we are writing to express our **continuing concern regarding the significantly increased allocations to unincorporated areas** in the recommended housing allocation methodology - Option 8A (methodology) - for the Regional Housing Needs Allocation (RHNA) Cycle 6 and its potential to impact the natural and working lands of our region. We appreciate the response to our comment letters dated January 19, 2021. **As we have stated previously, we support the production of much needed housing in our region, consistent with statutory requirements.** Thank you for this opportunity to communicate our responses.

Unfortunately, we have found that ABAG’s response to our comments fails to address our underlying issues and raises new concerns. In the response letter, ABAG states,

“In identifying future locations for housing, ABAG supports the region’s county governments encouraging housing in these existing communities where most of the unincorporated population already lives, especially in locations within unincorporated counties that are near major job centers and high-quality transit stations.”

In the unincorporated areas in San Mateo and Santa Clara Counties with appreciable populations, captured in Census-designated place (CDP) or urban cluster designations, there is a glaring lack of major job centers, a lack of water and sanitation infrastructure, and lack of significant transportation hubs. This is consistent with the goals of Plan Bay Area and SB 375, which directs infrastructure and growth into incorporated areas for livability and climate mitigation objectives. In addition, many of these areas are surrounded by regionally recognized Priority Conservation Areas (PCAs), which seek to protect and enhance regionally significant natural landscapes, public access, and habitats surrounding the built environment, and to provide respite for the densifying Priority Development Areas (PDAs).

The reply letter further states,

“The Final Blueprint Growth Geographies not only exclude CAL FIRE designated “Very High” fire severity areas, but they also exclude “High” fire severity areas in unincorporated communities as well as county-designated wildland-urban interface (WUI) areas where

applicable. Communities can also choose to take these risks into consideration with where and how they site future development, either limiting growth in areas of higher hazard or by increasing building standards to cope with the hazard.”

While we appreciate the exclusion of High and Very High fire severity areas from designated growth areas, these growth areas do not extend appreciably into unincorporated areas in that would attempt to absorb its growth. San Mateo County’s only appreciable urban infill area is North Fair Oaks, which is limited in its ability to handle significant increases beyond what it has already planned for. Primary alternatives fall to the unincorporated coastside communities, which lack significant transit, as well as water and sanitation infrastructure and are proximate to these designated high and very high fire zones.

Similarly, in Santa Clara County, the only unincorporated urban infill areas are very limited as to their ability to absorb additional units. Stanford, adjacent to the City of Palo Alto, is the only location in which the County has an opportunity to negotiate housing units, and will not physically be able to absorb anywhere close to 3,000 units. The unincorporated pockets surrounded by the City of San Jose are governed by an agreement with the City that leaves planning for housing and urban services to City processes. Therefore, a significant proportion of units allocated to unincorporated Santa Clara County would result in sprawl into rural areas without urban services, counter to the intent of Plan Bay Area.

Furthermore, the response letter from ABAG states:

“...ABAG-MTC staff has facilitated discussions with local jurisdictions about opportunities to direct additional RHNA units to incorporated areas.”

While transfers from unincorporated to incorporated areas after the fact may be allowed, such “post approval of the RHNA methodology and allocations” agreements leave in place fundamentally flawed methodology, resulting high unit allocations to county unincorporated areas. This sets a precedent to for the next RHNA rather than establishing RHNA methodology and allocations that meet the statutory requirements, make sense and can be built. It is during the RHNA process, not after it has concluded, that the methodology and allocations must be set right.

While we appreciate the latest adjustments made to reduce unincorporated county allocations, we continue to feel the methodology fails to comply with statutory objectives laid out in Government Code (GOV) section 65584. In particular GOV 65584(d)(2):

(d) The regional housing needs allocation plan shall further all of the following objectives:

(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region’s greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.

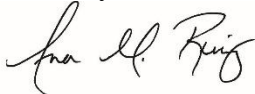
The methodology, as it is reflected through its excessive allocations to unincorporated areas, will force counties that lack the ability to meet their allocation requirements within its urbanized, transit-accessible areas into zoning lands that are inappropriate for housing and dangerous to local habitats and wildlife corridors in order to meet those requirements. It neither protects

environmental and agricultural resources as these lands are consumed, nor reduces greenhouse gas emissions due to the lack of transit alternatives in these rural areas where residents are forced to rely on automobiles.

For all of the reasons stated, while we support Option 8A and believe it contains important housing equity elements, we assert the methodology fails in regard to allocations to unincorporated areas, and request that the methodology be revised so that remaining housing allocations for unincorporated counties across the region be significantly reduced or eliminated, to maintain consistency with climate goals and strategies of SB 375, Plan Bay Area and the State of California.

We appreciate your consideration for these concerns and look forward to speaking with you should you have any questions.

Sincerely,



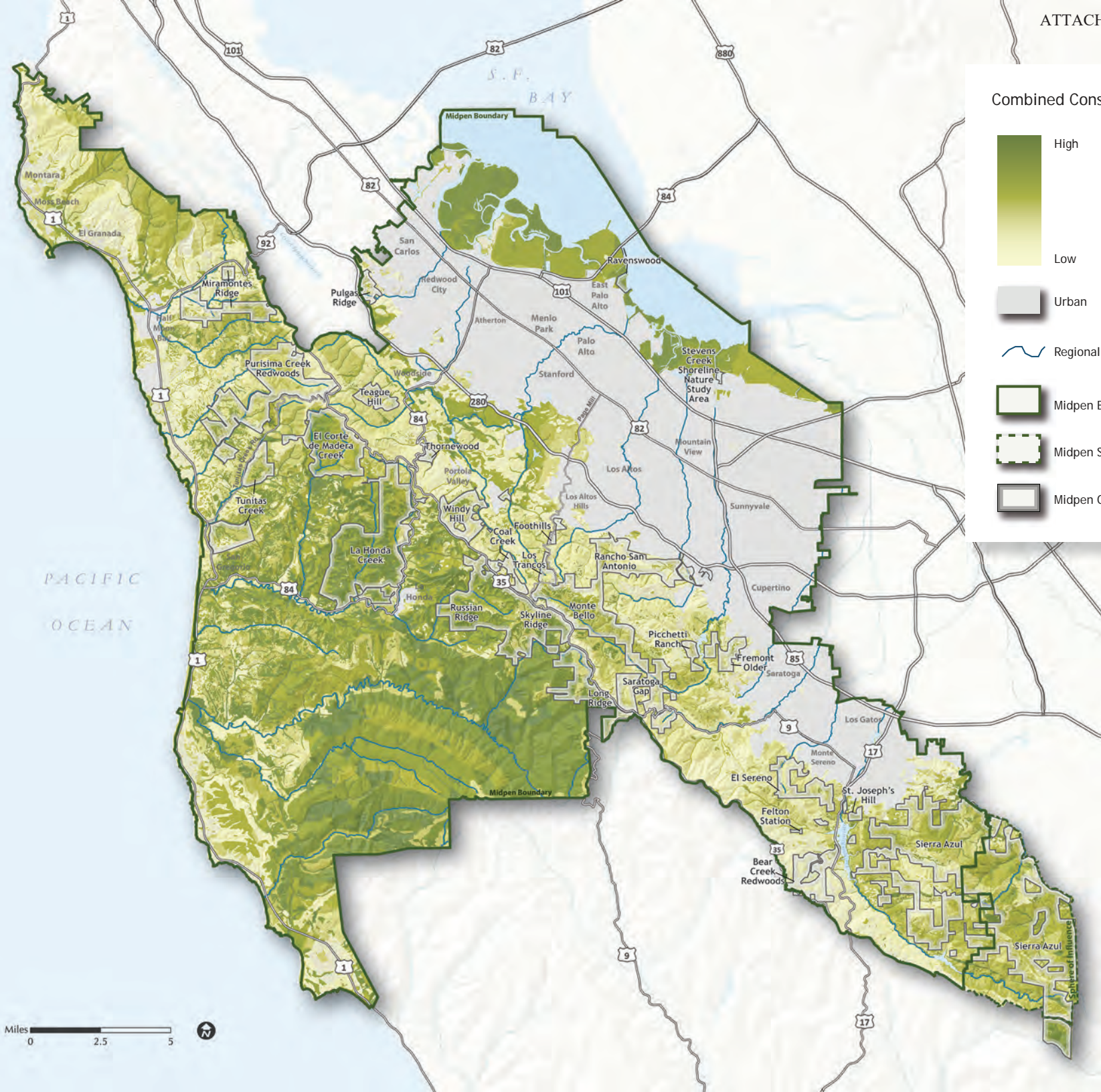
Ana M. Ruiz
General Manager
Midpeninsula Regional Open Space District



Andrea Mackenzie
General Manager
Santa Clara Valley Open Space Authority

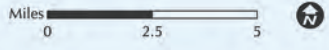
Attachments:

1. ABAG letter of response to earlier comments by the Midpeninsula Regional Open Space District dated January 19, 2021



Combined Conservation Values

- High
- Low
- Urban
- Regional Streams
- Midpen Boundary
- Midpen Sphere of Influence
- Midpen Open Space Preserves



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