

Comment Letter R-3: County of San Mateo Planning and Building, Chanda Singh



County Government Center
455 County Center, 2nd Floor
Redwood City, CA 94063
650-363-4161 T
planning.smcgov.org

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Via Email – john.seal@dot.ca.gov
Caltrans, District 4
Office of Environmental Analysis
ATTN: John Seal, Associate Environmental Scientist
P.O. Box 23660, MS: 8B
Oakland, CA 94623-0660

SUBJECT: Comments on the Draft Initial Study with Proposed Negative Declaration for the State Route 1 Multi-Asset Roadway Rehabilitation Project (EA 04-0Q130)

To Whom It May Concern:

R-3-1

San Mateo County appreciates the opportunity to submit the following comments on the San Mateo State Route (SR) 1 Multi-Asset Roadway Rehabilitation Project (EA 04-0Q130) Draft Initial Study with Proposed Negative Declaration (IS/ND) (<https://dot.ca.gov/-/media/dot-media/district-4/documents/d4-environmental-docs/0q130-sr-1-multi-asset-roadway-rehabilitation/2022-07-07-0q130-ded-final-508-a11y.pdf>). The Project seeks to rehabilitate existing pavement, improve existing traffic facilities, install Complete Streets elements, and install traffic operations system (TOS) elements along SR 1 from post mile (PM) 27.5 to PM 34.8, and install TOS on SR 92 at PM 0.2. We appreciate Caltrans' efforts in ongoing coordination with the County and finding opportunities to refine the Project to better meet community needs. The following comments are based on staff's review of the Project's IS/ND, the County's Certified Local Coastal Program, proposals in County plans, and County processes to inform the future Coastal Development Permit.

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Community Needs, Project Description, and Ongoing Coordination

We appreciate that the Project intends to implement several of the much-needed complete streets improvements identified Connect the Coastside: the San Mateo County Midcoast Comprehensive Transportation Management Plan, adopted by the County Board of Supervisors adopted in July 2022, and the Unincorporated San Mateo County Active Transportation Plan. These include Class 2 bike lanes on SR 1, ADA curb ramp improvements, completing pedestrian crossings at SR 1 / Coronado Street, and others. We look forward to continued coordination with Caltrans during the Project's future phases to ensure consistency in implementation with Connect the Coastside's recommendations and continue to seek opportunities to leverage the Multi-Asset Project to further community goals.

We appreciate IS/ND's Section 1.4.9.1 Coordination with Local Transportation Plans, and Pedestrian Crossings on SR 1 at Surfer's Beach (p.1-13), which identifies the need to coordinate moving forward to evaluate a pedestrian crossing of SR 1 near Surfer's Beach.



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In addition to the County, coordination with the City of Half Moon Bay, County Harbor District, Granada Community Services District, and others will be necessary. We also recommend updating this section for the final environmental document to reflect that the Board of Supervisors adopted Connect the Coastsides in July 2022. The County recently updated its webpage as well: to access Connect the Coastsides, please visit: <https://www.smcgov.org/planning/connect-coastside>.

Section 1.4.9 Complete Streets (p.1-10) identifies that "Transit stops would be paved, and new sidewalks would be connected along SR 1." We encourage Caltrans to continue working with SamTrans to implement additional transit stop amenities as part of this project, such as benches, shelters, lighting, and bike racks. At minimum, we encourage Caltrans to ensure the design includes adequate pavement and sidewalk width for future transit stop amenities while maintaining ADA accessibility. This would be consistent with Connect the Coastsides' recommendations to improve existing bus stops to create a safer and more comfortable waiting environment, given the long waiting times between buses.

During stakeholder engagement for Connect the Coastsides, community members shared that there are opportunities to improve the culverts at Arroyo de en Medio in Miramar to support pedestrian crossings of SR 1. We encourage Caltrans to look for opportunities to address pedestrian access as part of the Project's culvert replacement and/or repair at this location.

Connect the Coastsides includes data and evaluation recommendations, including providing annual reports on projects and conditions in the Plan's area. Section 1.4.6 describes locations for new traffic management systems that will provide data on conditions on SR 1 and SR 92. The County would like to coordinate with Caltrans to access and/or analyze this data for reporting and to support future project development.

In 2023, the County will be undertaking roadway projects in El Granada to improve school safety to Wilkinson School and El Granada Elementary School, including the addition of a stop sign with marked crossing on northbound Coronado Street at Avenue Alhambra. We can coordinate with Caltrans as needed.

R-3-3

Permitting

IS/ND Sections 1.8 Necessary Permits and Approvals (p.1-22), 2.2.11 Land Use and Planning (p.2-35), and 3.1.4 Coastal Zone Coordination (p.3-2) acknowledge that the project is in the coastal zone and would be governed in part by the County's Local Coastal Program (LCP) and that it must comply with the policies of the LCP. San Mateo County's LCP characterizes the proposed improvements as Public Works (LCP Policy 2.2(b)) and requires that all public works projects within the County's coastal zone obtain a Coastal Development Permit (CDP) or exemption from CDP requirements. The IS/ND should clarify that the proposed Project is partially within San Mateo County's CDP permit jurisdiction; however, any issued CDP will be appealable to the California Coastal Commission (CCC) (PRC Section 20603).

LCP Consistency

As part of the CDP process, it will be necessary for Caltrans to demonstrate consistency with the County's LCP. IS/ND Section 2.2.11 Land Use and Planning (p.2-34) includes a preliminary consistency analysis, with Table 2-4 (p.2-38) summarizing the Project's potential impacts per key components of the LCP. LCP Policy 2.48(b) requires roadway improvements be consistent with all applicable policies of the Local Coastal Program, including, but not limited to, the Sensitive Habitats Component. Potential LCP consistency issues are described further below:

Sensitive Habitats Components

LCP Policy 7.1 defines sensitive habitats as any area in which plant or animal life or their habitats meets certain criteria, including habitats containing or supporting "rare and endangered" species as defined by the State Fish and Game Commission. Applicable policies include but are not limited to Policy 7.3 Protection of Sensitive Habitats, Policy 7.5 Permit Conditions, and Policy 7.42 Development Standards. Section 2.2.4 Biological Resources (p.2-7) states that the biological study area (BSA) is the Project's footprint, along with buffer areas that construction activities may directly or indirectly impact. Section 2.2.4.1(a) (p.2-8) states that the BSA contains potential habitat for special-status species that have moderate to high potential to occur. As part of the permit process, Caltrans will need to coordinate closely with the County to avoid, minimize and mitigate temporary and permanent impacts to sensitive habitats and species, including implementation of the IS/ND's identified avoidance and minimization measures.

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Public Works Components

LCP Policy 2.50 Improvements for Bicycle and Pedestrian Trails (h) states, "Ensure that no roadway repair or maintenance project blocks or damages any existing or formally planned public trail segment or, if such an impact is not avoidable, that an equal or better trail connection is provided in conjunction with that repair and maintenance project either directly by CalTrans or through CalTrans' funding to a third party." As part of the permit process, it will be necessary to demonstrate consistency and that the proposed project will not preclude implementation of adopted plans.

Section 1.4.10 Utility Relocation states "existing utilities may need to be relocated during construction" (p.1-13). The Montara and Granada Lighting Districts have lighting facilities along SR 1. Care must be taken to protect the existing light poles and any wiring associated with them during construction. At the time Caltrans intends to seek a Coastal Development Permit, project plans will need to state that any damages to the Lighting District facilities during construction shall be repaired by the Contractor per the Lighting District standard details and at the Contractor's expense; and the Lighting Districts must be notified of any damages to the lighting facilities and any repairs must be inspected by Lighting District representatives. The Lighting Districts will review for consistency.

Visual Resources Component

LCP Policy 8.30(b) designates SR 1 north of Half Moon Bay as a County Scenic Corridor; therefore, LCP Policy 8.31 Regulation of Scenic Corridors in Rural Areas applies to the

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project, which includes application of policies of the Scenic Road Element of the County General Plan, rural design policies of the LCP, and section 6325.1 of the Resource Management Zoning District as special regulations protecting scenic corridors in the Coastal Zone. The Project includes guardrail replacement (Section 1.4.3) to standard Midwest guardrail systems and incorporation of flush and raised median treatments where feasible (Section 1.4.9). IS/ND Section 2.2.1 Aesthetics (p.2-2) states that the guardrail finish will include a matte finish on exposed metal surfaces to address reflectivity; it does not discuss potential materials for the medians. As part of the CDP process, Caltrans will need to demonstrate consistency with the policies above, ensuring coastal views are not impacted and materials chosen will align with stated policies.

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Hydrology and Water Quality

Section 1.47 Drainage Inlet, Culvert, and Dike Replacement (p.1-9) describes the anticipated work based on a preliminary review of existing drainage elements. Section 2.2.10 Hydrology and Water Quality (d) (p.2-33) states a single location on SR 1 at Surfer's Beach is susceptible to tsunami and seiche inundation and is in a Federal Emergency Management Agency (FEMA) management system for sites with potential to affect water quality in the project area. FEMA FIRM panel 06081C0138F lists flood zone AE for El Granada Creek (also known as Deer Creek) and Denniston Creek. Please confirm that the culverts at these creeks, at approximately PM 32.7 and PM 33.4 respectively, were included in the assessment of existing drainage facilities, as the impacts to flood hazard areas should be accounted for if these culverts require replacement.

R-3-6

Land Use and Planning

The County is in the process of developing Plan Princeton (<https://www.smcgov.org/planning/plan-princeton>). The purpose of this project is to make a comprehensive update to the policies, plans, and standards regulating the Princeton area, including an update to the land use plan for Princeton. The County suggests referencing the draft Plan in the final environmental document, and specifically as part of Section 2.2.11 Land Use and Planning (p.2-34).

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Transportation

Section 2.2.17 Transportation (a) on p.2-48 references consistency with applicable plans. The section should reference and evaluate consistency with the 2021 Unincorporated San Mateo County Active Transportation Plan, 2022 Connect the Coastside, and Plan Princeton (draft).

Section 2.2.17 Transportation (d) includes TRANS-01: Development of a Transportation Management Plan (p.2-49) as a proposed avoidance and minimization measure. The County looks forward to coordinating with Caltrans on the Plan and requests a minimum of three weeks for the County to review and comment on the draft Transportation Management Plan prior to finalization.

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Geology and Soils

Section 2.2.7.1 Geology and Soils (c) (p. 2-24) discusses unstable soil conditions and refers to future geotechnical and geological study during the final design phase. The potential hazards discussed in this section did not include coastal effects, including but not limited to bluff retreat, coastal erosion, and sea level rise. The County notes that some of these hazards are preliminarily discussed in the Section 2.3 Climate Change (comments below). Additional evaluation should be included in the future geotechnical and geological study in collaboration with the County's geotechnical reviewer.

Section 2.2.7.1 (d) cites the Uniform Building Code (1994) as the reference section. In the future geotechnical and geological study, Caltrans should use current code sections to guide investigations and design.

Climate Change

Section 2.3 Climate Change (p.2-58) describes applicable policies and the project's potential impacts. As described in Section 2.3.5.1 Sea-Level Rise Analysis, the IS/ND uses a high emissions scenario with a 1-in-20 probability of 4.4 feet of sea level rise by 2100 for its analysis (closest scenario is 5 ft in the NOAA viewer and 4.9 ft with 100-year storm in the OCOF viewer). The State of California Sea-Level Rise Guidance 2018 Update (Guidance) generally recommends decisionmakers use the medium-high, or 1-in-200 probability, sea-level rise projection for "longer lasting projects with less adaptive capacity and medium to high consequences should sea-level rise be underestimated" (p.27). The Guidance further recommends using an extreme risk aversion scenario (10.2 ft of SLR by 2100) for critical infrastructure. However, the Guidance provides flexibility to choose scenarios based on the lifespan of the project and risk tolerance.

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San Mateo County's Local Hazard Mitigation Plan uses a scenario of 6.6 feet with 100-year storm by 2100 for its analysis (this is the closest available OCOF data comparable to a high emissions scenario with a 1-in-200 probability or 6.9 ft of SLR). This scenario puts the water level along the border of SR 1. If using an extreme risk aversion scenario (9.8 feet sea level rise in the OCOF viewer), sections of SR 1 around Surfer's Beach are inundated by water with or without the 100-year storm. In addition to inundation, the Our Coast Our Future Hazard Map (<https://ourcoastourfuture.org/hazard-map/>) shows cliff retreat (erosion) overlapping with Highway 1 at 2.5 feet of sea level rise. Under the IS/ND's 1-in-20 probability scenario, 2.4 feet of sea level rise would occur by 2070. Under the 1-in-200 probability scenario used by the County for its Local Hazard Mitigation Plan, 2.6 feet of sea-level rise would occur by 2060. Under the extreme risk aversion scenario, 2.7 feet of sea-level rise would occur by 2050.

The IS/ND states on p.2-71 that "Surfer's Beach adjacent to SR 1 in the community of El Granada is vulnerable to erosion and wave run up at locations under the sea level rise scenarios examined for this analysis. However, the projected sea level rise scenario to the end of the century would extend beyond the service life of the proposed pavement work at this location." Caltrans should clarify the service life of the Project's various components, especially in the Surfer's Beach area, to justify the use of the 1-in-20 probability scenario.

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The IS/ND goes on to state on p.2-71 "Flood risk management at Surfer's Beach to address inundation of these adjacent features over the long term would require substantial shoreline protection efforts that are outside the purpose and need, and the service life of the work proposed for the project. Caltrans welcomes coordination and expects to participate in discussions with stakeholder groups to identify long term solutions to address sea level rise at Surfer's Beach that may also affect the existing transportation facilities." Inundation and soil erosion has been and will continue to be a concern that principally impacts SR 1. The County looks forward to Caltrans taking a leadership role in bringing stakeholders together to identify long term solutions that preserve access and mobility.

R-3-10

Errata

In our review, we found a few discrepancies that Caltrans should consider revising for clarity in the final environmental document:

- Section 1.8 Necessary Permits and Approvals: Table 1-3 (p.1-22) should list appropriate agency as "San Mateo County," not "San Mateo County Local Coastal Plan". Similarly, the appropriate agency should be listed as "City of Half Moon Bay," not "City of Half Moon Bay Local Coastal Plan."
- Section 2.2.13.1 Noise (a) on p.2-43, references "the closest sensitive noise receptors would be residences and commercial businesses in the Moss Beach, El Granada and Miramar areas of Half Moon Bay..." This should be revised as it conflates unincorporated communities with Half Moon Bay. Suggested revision: "The closest sensitive noise receptors would be areas within 0.5 miles north and south of project locations, including residences and commercial businesses in the unincorporated communities of Moss Beach, Princeton, El Granada, and Miramar, and areas in the City of Half Moon Bay."
- Section 2.2.21 Mandatory Findings of Significance (b), references findings from the Highway 1 Safety and Mobility Improvement Study. We suggest expanding this language to additional plans that include recommended projects, such as Connect the Coastside, Plan Princeton (draft), and the Unincorporated San Mateo County Active Transportation Plan.

Sincerely,



Chanda Singh
Senior Transportation Planner

CC: Steve Monowitz, San Mateo County, Community Development Director
Lisa Aozasa, San Mateo County, San Mateo County, Deputy Director of Community

Development

Katie Faulkner, San Mateo County, Planner III
Melody Eldridge, San Mateo County, Associate Civil Engineer
Sherry Liu, San Mateo County, Associate Civil Engineer
Ann Stillman, San Mateo County, Director of Public Works
Khoa Vo, San Mateo County, Deputy Director of Public Works
Hanieh Houshmandi, San Mateo County, Associate Civil Engineer
Ryan Rasmussen, San Mateo County, Road Maintenance Manager
Alan Velasquez, San Mateo County, Senior Civil Engineer
Nicholas Calderon, San Mateo County, Director of Parks and Recreation
Chris Hunter, San Mateo County, Chief of Staff
Maz Bozorginia, Half Moon Bay, City Engineer
Claire Toutant, Midcoast Community Council, Member
Len Erickson, Midcoast Community Council, Member
Peter Allen, California Coastal Commission, Senior Transportation Program Analyst
Kelly Ma, Caltrans, Project Manager

Response to Comment Letter R-3: County of San Mateo Building and Planning

R-3-1. Thank you for your introductory statements. Please see the ensuing comment responses.

R-3-2. Caltrans appreciates the input on the Build Alternative and looks forward to continued coordination with San Mateo County and SamTrans on Project elements that serve common goals.

Regarding updates to Section 1.4.9.1, the final Initial Study has been revised to update this section, providing a link to the current Connect the Coastside webpage.

Regarding recommendations for the transit stop amenities, Caltrans will coordinate with SamTrans during the final design phase to consider elements that are appropriate for inclusion in the final build.

Regarding the use of drainage culverts for pedestrian passage, please see the responses to Comments I-13-1 and I-16-1. Drainage culverts are not intended for pedestrian passage and are not a safe use of this facility. Caltrans does not condone, support, or approve of pedestrian passage through its drainage systems. Please do not enter drainage culverts.

Regarding traffic data sharing, Caltrans traffic cameras can be viewed online at the Caltrans QuickMap web page (<https://quickmap.dot.ca.gov/>), and camera livestreams can be viewed for shorth durations at <https://cwwp2.dot.ca.gov/vm/iframemap.htm>.

Additionally, traffic data collected by the Project would be posted on Caltrans' performance measurement system (PeMS) site <https://pems.dot.ca.gov/>. Access to the PeMS site is subject to Caltrans approval of an application for site use and Caltrans' terms of use for the site. Currently, there are no data being collected on SR 1 in the Project area available on PeMS because there are no sensors in place for traffic data collection. The Project is proposing TOS elements to address this gap in data collection on SR 1 in the Project area to better inform traffic planning decisions along this corridor. Caltrans and San Mateo County OES have been working together to better integrate incident management operations between the two agencies. Initial efforts have centered around the San Mateo Smart Corridor and the Peninsula cities. One of the key initial activities is to establish a connection to the County EOC building and the Caltrans fiber-optic system that will allow for future sharing of information, including SMC alerts and emergency vehicle preemption to supplement current practices.

Regarding coordination on El Granada roadway project that may intersect efforts in the Caltrans right-of-way, Caltrans looks forward to continued efforts and partnership with San Mateo County.

R-3-3. Caltrans understands that the Project partially occurs within the Coastal Zone that is governed by San Mateo County's LCP. A Coastal Development Permit through San Mateo County's LCP was included in Section 1.8, Table 1-3. Caltrans also understands that any issued Coastal Development Permit may be appealed to the California Coastal Commission, but this scenario is not an assumed course for permit processing. Clarification has been added to Table 1-3, in accordance with the recommendations provided in San Mateo County's comments.

R-3-4. Caltrans appreciates the early technical assistance provided in these comments. Caltrans will work with all agencies with jurisdiction during the Project's final design and permitting phase to provide a complete and appropriate description and analysis of the build alternatives refined design at that stage. Caltrans looks forward to coordinating with San Mateo County, the City of Half Moon Bay, and California Coastal Commission staff during the permitting stage.

R-3-5. No culvert replacement or other instream work is anticipated at Denniston Creek or Deer Creek. The existing culverts at Denniston Creek and Deer Creek were evaluated during field visits in 2019 and found to be in good condition. Therefore, no culvert replacement is proposed at these locations.

R-3-6. Thank you for making Caltrans aware of the scoping work that has been developed by San Mateo County. Please note that the draft plan referenced in this comment does not appear to be posted at the website link provided (checked on September 12, 2022). However, other Project information was available, and it appears that San Mateo County's Plan Princeton Project primarily addresses land use outside of the Caltrans right-of-way, but also includes some recommendations for bicycle, pedestrian, and signage improvements within Caltrans' right-of-way. Caltrans looks

forward to coordinating with and providing oversight on any county plans for improvements that would occur within Caltrans' right-of-way. Caltrans invites the county to reach out to Caltrans to make us aware of any plans or issues where Caltrans input is appropriate. Because there are no land use designations in the Plan Princeton document showing in the Caltrans right-of-way, and the proposed Build Alternative for Caltrans' Project would not impact the existing or proposed land uses, the county's study is not referenced in the final Initial Study.

R-3-7. Thank you for this comment. Caltrans looks forward to coordination with San Mateo County.

R-3-8. Please note that the responses provided in Section 2.2.7 are within the context of the CEQA Guidelines, which identify specific hazards related to geology and soils. Caltrans understands that hazards such as bluff retreat, coastal erosion, and sea-level rise are present in the SR 1 corridor. The Project proposes to extend the lifespan of roadway facilities. However, this does not preclude future projects from studying and making improvements to address long-term threats such as sea-level rise.

R-3-9. Caltrans states in its Project description that the Project is proposing a 20-year flexible rehabilitation strategy. This means that the useful life of the repaved roadway would be 20 years after construction. Caltrans believes that the analysis provided and the assumptions made in selecting a risk scenario are appropriate.

R-3-10. Thank you for these additional considerations.

- Section 1.8, Table 1-3, has been revised as San Mateo County recommended.
- Section 2.2.13.1 has been revised to refer to Moss Beach, El Granada, and Miramar as communities, rather than "areas of Half Moon Bay."
- Section 2.2.21 has been updated to describe local plans and projects that are relevant to the SR 1 corridor, including the plans described in this comment. Please refer to Table 2-7.