

## MEMORANDUM

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Date: August 14, 2020

Project #: 20616

To: Mike Schaller  
San Mateo County Planning & Building Department  
455 County Center, 2nd Floor  
Redwood City, CA 94063

From: Mike Alston, RSP; Aaron Elias, PE

Project: Cypress Point

Subject: Update Regarding Cypress Point Transportation Analysis

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In April 2019 Kittelson & Associates, Inc. (Kittelson) and MidPen Housing submitted a draft traffic impact analysis (2019 TIA) for the Cypress Point affordable housing Project (Project) to San Mateo County Public Works (County). This memorandum documents recent changes to the California Environmental Quality Act (CEQA) guidelines that have occurred since the 2019 report was prepared, changes to County policy that are in the process of being revised, and the effect on Project analysis that these changes may have. Revisions to the 2019 report will not be made at this time but will be undertaken in the future when the uncertainties described below are resolved.

### 2019 TRAFFIC IMPACT ANALYSIS

The 2019 TIA analyzed the transportation effects of the proposed Project and identified a number of significant impacts. This analysis was based on the County's 2014 transportation study guidelines and California Environmental Quality Act (CEQA) guidelines. At the time the report was written, the CEQA Guidelines allowed the impacts of a project on roadways and intersections to be analyzed in terms of automobile level of service (LOS), and the 2019 TIA used County guidelines LOS criteria in evaluating the project's impacts. The 2019 TIA also recommended a set of intersection improvements as mitigation for the LOS and safety impacts at intersections.

### CEQA UPDATES

SB 743, signed in 2013, mandated environmental impact findings to be based on a metric other than automobile level of service (LOS) after July 1, 2020. The California Office of Planning & Research (OPR) has issued technical advisory guidance for implementing SB 743 changes and using vehicle miles

traveled (VMT) rather than LOS to evaluate environmental impacts.<sup>1</sup> The OPR guidance indicates that lead agencies (e.g., the County) have discretion to select an appropriate screening threshold, below which a project would not be expected to have a significant impact.

OPR, which publishes the CEQA Guidelines, provides this additional guidance regarding projects involving affordable housing:

“...[A] project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less than significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations. Lead agencies may develop their own presumption of less than significant impact for residential projects (or residential portions of mixed-use projects) containing a particular amount of affordable housing, based on local circumstances and evidence.”

## CHANGES IN COUNTY POLICIES

San Mateo County is currently revising its transportation analysis guidelines, which when updated will include screening thresholds for applying VMT in transportation analysis. In addition, the County is in the process of preparing a transportation improvement plan for the MidCoast region of the County, called *Connect the Coastside*, which will make recommendations for transportation improvements, including for roadways and intersections in Moss Beach.

## LEVEL OF SERVICE POLICY IN THE SAN MATEO COUNTY LOCAL COASTAL PROGRAM

The San Mateo County Local Coastal Program (LCP) contains the following policy regarding level of service:

### **2.43 Desired Level of Service**

In assessing the need for road expansion, consider Service Level D acceptable during commuter peak periods and Service Level E acceptable during recreation peak periods.

The consistency of the proposed LCP amendment with all policies, including Policy 2.43, in the San Mateo County LCP is provided in the report *Cypress Point Project Policy Consistency Analysis*, prepared by Stevens Consulting.

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<sup>1</sup>California Office of Planning and Research. *Technical Advisory on Evaluating Transportation Impacts in CEQA*. December 2018. Page 15. [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf). Accessed August 10, 2020.

## ANTICIPATED CHANGES TO THE TIA

Until the changes in County policy have been resolved, revision of the 2019 TIA would be premature. However, it can be anticipated that the next revision of the report will include the following types of changes:

- Environmental impacts related to transportation will be evaluated using the County's VMT threshold, rather than the LOS standard;
- A separate analysis of the effects of the proposed project on roadways and intersections will be conducted using County methods and thresholds, but this will be separate from the CEQA analysis;
- The analysis will consider consistency with relevant Local Coastal Plan policies, including LOS criteria;
- Improvements to roadways and intersections that are expected to become conditions of approval during the Coastal Development Permit portion of the process, will be determined through negotiations with the County and possibly Caltrans, and with consideration of the recommendations in the *Connect the Coastside* report, should it be finalized at that time.