

August 29, 2002

Board of Directors Mid-Peninsula Regional Open Space District 330 Distel Circle Los Altos, CA 94022-1404

## Dear Directors:

The San Mateo County Association of REALTORS® wishes to express our concerns about the Mid-Peninsula Regional Open Space District's (MPROSD) San Mateo Coastal Annexation Draft Environmental Impact Report (EIR). We wish to comment on what we believe to be inadequacies in the EIR with regard to the increased traffic congestion that the annexation will generate in the proposed annexation area. In several respects, we think the study is flawed.

The issue of increased traffic is addressed in the Draft Environmental Impact Report, Page IV-C-7. We agree that the majority of preserve visitors would arrive via car predominantly on weekends and holidays, but we suggest that using the traffic experience from MPROSD's current preserves as a predictor for estimating the future traffic impact to the new acquisitions would not be accurate. In Appendix B: Traffic and Parking Study of the San Mateo Coastal Annexation Program Environmental Impact Report, four traffic counts were conducted at MPROSD's current preserves of Windy Hill and Purisima Creek. We think that four counts are inadequate to effectively assess the potential traffic impact on the San Mateo Coast, especially since the counts were all conducted within the months of July and August of 2001. We suggest that a more comprehensive study over the better part of a year, including traffic counts from three seasons (excluding Winter because of the colder weather), would be a better study of potential traffic impact.

Additionally, the study failed to encompass the wide range of determinates influencing visitor traffic to any given preserve on any given weekend, such as weather, proximity to potential preserve visitors' homes, and other local events in the Bay Area that attract visitors who might otherwise visit the preserves on those weekends studied. The proposed coastal annexation area is much closer, and, therefore, much more accessible and convenient to San Francisco and northern San Mateo County residents than are MPROSD's current preserves of Windy Hill and Purisima Creek. Residents from these areas would constitute a whole new set of potential visitors to MPROSD lands if the annexation were to occur. While some may argued that San Francisco residents would be more attracted to the open space preserves in Marin County, we would counter that the upcoming Golden Gate Bridge toll increase to \$5 and the possibility of peak traffic pricing would influence many to go south instead to the Coastside for open space with similar terrain.

According to Table IV-C-2, the capacity of a *typical* two-lane, undivided road are 2800 cars. We would suggest, however, that the highways leading to the proposed Coastal Annexation area are

atypical due to the intersection of U.S. Highway 1 and U.S. Highway 92, whose logistics already cause backups in the area in and around Half Moon Bay. Further, U.S. Highway 1 is already in itself a destination for visitors to the Bay Area as well as the residents of the nine counties in the San Francisco Bay Region.

The highways leading to the coast are described as operating below capacity, based on the assumption that the capacity is 2800 cars for *both lanes*, an assumption that does not take into account peak traffic. In the proposed Coastal Annexation area, most of the traffic flow is in one direction in the early afternoon and the opposite direction in the early evening. Dividing the capacity in half (2800 / 2), gives a capacity of 1400 per lane. Given the normal weekend traffic scenario in the San Mateo Coastside, where at least 70% of the traffic flow is inwards towards Half Moon Bay, we would posit that the capacity has already been reached and surpassed during these peak use periods. Below is a table of the proposed actual traffic flow and impact which indicates that in some areas capacity has been reached, if not already surpassed. Any additional traffic caused by visitors to the proposed annexation would only exacerbate this problem.

Road	Location	Traffic Flow	Capacity for One
		towards Coastside	Lane towards
		during peak traffic	Coastside <sup>3</sup>
		hours $(12 - 3 \text{ PM})^2$	
Route 1	Route 84 – Tunitas Creek	701.4	1400
	Road		
	Main Street – Half Moon	907.9	1400
	Bay Road		
Skyline	Alpine Road – Woodside	133.7	1400
Boulevard	Drive		
	Kings Mountain Road – SR	126	1400
	92		
	SR 92 – I-280	310.1	1400
Route 84	Skyline Boulevard	328.3	1400
	Woodside – Portola Road	270.9	1400
	Kings Mountain Road –	555.8	1400
	Whiskey Hill Road		
	Whiskey Hill Road - I-280	1475.64	1400
Route 92	Route 1 – Half Moon Bay	1173.9	1400
	Half Moon Bay – Skyline	1396.5	1400
	Boulevard		
	Skyline Boulevard – I-280	1113.7	1400

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<sup>&</sup>lt;sup>1</sup> We believe this to be a conservative estimate of the one-way directional flow of traffic in the area on weekends.

<sup>&</sup>lt;sup>2</sup> This is calculated using an estimated 70% of Estimated Traffic Flow from Table 2 in Appendix B of the San Mateo Coastal Annexation Draft Environmental Impact Report.

<sup>&</sup>lt;sup>3</sup> This is calculated by dividing the Capacity from Table 2 in Appendix B of the San Mateo Coastal Annexation Draft Environmental Impact Report in half to get the capacity for one lane.

<sup>&</sup>lt;sup>4</sup> We have bolded the routes that are near or above capacity.

Further, the estimate of a 1400 capacity per lane might need to be adjusted down to account for the *atypical* nature of the road due to inadequate maintenance. Therefore, some of the other routes, such as 'Route 1 – Half Moon Bay' and 'Skyline Boulevard – I-280' might also be above capacity if the atypical nature of the routes were taken into account.

In conclusion, we would like to reaffirm our opposition to the current draft of the Mid-Peninsula Regional Open Space District's San Mateo Coastal Annexation Environmental Impact Report. We feel that before any decision of annexation can be made, a more comprehensive study and analysis of the potentially negative impacts of increased traffic must be thoroughly addressed.

Thank you for your consideration of our views in this matter. Should you have any questions of us, please feel free to call me or our Governmental Affairs Director, George Mozingo, at (650) 696-8214.

Sincerely,

Dennis J. Pantano

President, Board of Directors