

**APPENDIX H:  
COMMENTS ON THE DRAFT EIR**



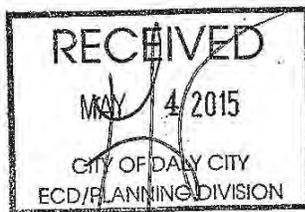


STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN, Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 4  
P.O. BOX 23660, MS-10D  
OAKLAND, CA 94623-0660  
PHONE (510) 286-5528  
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<http://www.dot.ca.gov/dist4/>



Serious Drought,  
Help save water!

May 4, 2015

SMVar023  
SCH# 2014052029

Mr. Michael Van Lonkhuysen  
Planning Division  
City of Daly City  
333 90<sup>th</sup> Street  
Daly City, CA 94015

Dear Mr. Van Lonkhuysen:

**Serramonte Shopping Center Expansion – Draft Environmental Impact Report**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system; provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl. The following comments are based on the Draft Environmental Impact Report.

A01-01

**Multi-Modal Facilities**

1. Appendix F, page 52, Design and Compatible Use Hazards: Many streets and intersections are located within the Caltrans right-of-way (ROW). There are some new Class I bicycle paths, Class II bicycle lanes, and Class III bicycle roads, sidewalks, and curb ramps involved in this project. All new facilities, such as those mentioned above located within the Caltrans ROW must follow the Caltrans standards. Please modify this paragraph to reflect the change.
2. The City of Daly City's (City) Bicycle and Pedestrian Master Plan includes a planned Class III bicycle route along Serramonte Boulevard between Gellert Boulevard and Junipero Serra Boulevard, we strongly encourage the City to provide a more separated facility for bicyclists given the vehicle volumes and speeds. We also recommend that the bike facility extend to the intersection directly to the west of the Serramonte Boulevard/Gellert Boulevard intersection so that it connects to the existing bike lane.

A01-02

A01-03

Mr. Van Lonkhuysen/City of Daly City  
May 4, 2015  
Page 2

- 3. Please confirm that the intersections of Callan Boulevard and Serramonte Center West and Callan Boulevard and Clarinada Avenue will have crosswalks and directional curb ramps on all four legs of the intersection. We recommend that you install stop bars ahead of the crosswalks to reduce a multiple threat situation where one vehicle blocks the view for another motorist of pedestrians crossing in the crosswalk.
- 4. To encourage use of the nearby SanTrans bus stops the proposed parking ratio should be lowered. A Transportation Demand Management program (Transportation Demand Management) should be established that builds off of the proposed employee trip commute reduction program (CTR) with goals to reduce all vehicle trips and a monitoring program. As in the CTR, future employees should be provided with transit subsidies as one of the amenities covered in the TDM program and bicycle parking facilities which can include bicycle lockers or secure indoor parking for all-day storage and bicycle racks for short-term parking.

A01-04

A01-05

***Transportation Permit***

Project work that requires movement of oversized or excessive load vehicles on state roadways, such as I-280 requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to the following address: Transportation Permits Office, 1823 – 14<sup>th</sup> Street, Sacramento, CA 95811-7119.

A01-06

See the following website link for more information: <http://www/hq/traffops/permits/>.

***Transportation Management Plan***

If it is determined that traffic restrictions and detours are needed on or affecting the state highway system, a Transportation Management Plan (TMP) or construction TIS may be required and approved by Caltrans prior to construction. TMPs must be prepared in accordance with *California Manual on Uniform Traffic Control Devices (CA-MUTCD)*.

Further information is available for download at the following web address:  
<http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>.

A01-07

Please ensure that such plans are also prepared in accordance with the transportation management plan requirements of the corresponding jurisdictions. For further TMP assistance, please contact the Office Traffic Management Plans at (510) 286-4579.

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***Encroachment Permit***

Work that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: Mr. David Sallady, Office of Permits, California Department of Transportation, District 4, P.O. 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information. <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

A01-08

Please feel free to call or email Sandra Finegan at (510) 622-1644 or [sandra.finegan@dot.ca.gov](mailto:sandra.finegan@dot.ca.gov) with any questions regarding this letter.

Sincerely,



PATRICIA MAURICE  
Acting District Branch Chief  
Local Development – Intergovernmental Review

A01-09

c: State Clearinghouse

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TOWN OF COLMA  
PLANNING DEPARTMENT

1190 El Camino Real • Colma, California 94014  
Phone: (650) 757-8888 • FAX: (650) 757-8890

May 5, 2015

Mr. Michael VanLonkhuysen  
City Hall - Daly City Planning Division  
333 - 90th Street  
Daly City, CA 94015

**RE: Serramonte Mall Draft EIR Comments**

Dear Michael:

Thank you for meeting with us on Friday April 17, 2015 to discuss the Town of Colma's concerns with the traffic section of the Serramonte Mall EIR. As a follow up to this meeting, the Town requests the City of Daly City address or comment on in the following concerns in the Final EIR:

**Executive Summary:**

*Pg. 1-5: Under section 1.5, the text notes that three alternatives were analyzed, but only two are listed.*

**Traffic Comments:**

*General Comment:* Summary mitigation table in Executive Summary (Table 1-1) should be updated to include the name of the intersection related to the mitigation measure.

*General Comment:* EIR does not include any meaningful traffic diagrams which illustrate existing and post-mitigation conditions.

*General Comment:* We discussed the need to include a full mitigation monitoring plan that will detail the required mitigation and the responsible parties. As indicated in the meeting, Colma will work with the applicant and the City of Daly City to mitigate intersection impacts in Colma. Since this information was not provided in the Draft EIR, the Town would like to review and comment on this document when it is completed. The Town wants to assure that there are mechanisms in place that will require the developer to meet its fair share obligation to contribute to traffic improvement solutions that can be implemented.

*General Comment:* Portions of Colma and Daly City in the vicinity of the proposed project experience near gridlock conditions during the holiday shopping season in late November through December, particularly aggravating evening and weekend peak traffic. The EIR should include a discussion of this condition and how it may affect any of the intersections studied. While it may not be feasible or required to mitigate for this short-term condition, any practical and feasible adjustments that can be made as part of mitigation implementation should be considered.

*General Comment:* The project is estimated to generate 991 new jobs, which is in addition to the significant number of employees who already work at the mall and in the vicinity of the mall. Discussion in the EIR should include the feasibility of a mall funded (or shared funded) employee shuttle to the Colma BART station and/or other Transportation Demand measures. An employee shuttle has the potential to significantly reduce vehicle trips. A shuttle could greatly benefit employees and patrons of

A02-01

A02-02

A02-03

A02-04

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A02-07



the mall. In addition, mall management should take initiative in providing staff and resources to provide promotions and incentives to mall employees to utilize alternative transportation (in addition to required employer incentives).

**A02-07  
cont.**

*General Comment:* The Traffic Impact Study relies on the Daly City traffic model to forecast future cumulative traffic. Discussion in the EIR should include a description of what is included in this forecast.

**A02-08**

*Tables 7 and 8, Traffic Appendix:* Table 8 of the Traffic Impact Study in the Appendix unilaterally reduces trip generation estimates for the project as a whole by over 40% for the pm peak periods. This reduction is for linked and pass-by trips. The linked trips, as defined by the study, may be deducted. However, the pass-by trips should be distinguished from diverted trips. Trips diverted from El Camino, Junipero Serra Boulevard and from the State Highway will pass through and affect Colma intersections. It appears from Table 7 that approximately 30% of a reduction in overall traffic has been devoted to these pass-by trips. Table 7 presents the adjustment proposed for each of the uses of the project. However, there is no indication given as to how the overall adjustment factors have been derived. This could mean is that the new trips added to the three study intersections are low on the order of 30%. The Traffic Consultant should document these calculations and make appropriate adjustments to the traffic counts if necessary. The current approach to trip generation calculation does not appear to follow standard transportation engineering methodology. This has a moderate effect on the calculations for Colma intersections but has a more substantial effect on the intersection entrances to the project in Daly City.

**A02-09**

*Pg. 4-3: Table 4-1, Current and Future Developments in the City of Daly City:* We discussed the reason not to consider the development at the SamTrans Park and Ride lot by the BART station in the cumulative analysis. SamTrans issued an RFP for development of the site, and developers were selected. A Pre-application Review Application was submitted to the City of Daly City for a transit oriented development with 500 residential units and 15,000-20,000 square feet of retail. The Daly City Council held a study session on this project on August 13, 2014 and voiced no objections to the proposal. Council members also suggested that the retail component of this project be on Junipero Serra Boulevard to attract more visibility and business. Even though a full application has not been submitted to the City of Daly City, CEQA requires consideration of other "reasonably foreseeable plans and projects causing related impacts." Given the discussions of this project and the application submitted, development of the transit site with high density development is a strong possibility. Because of the close proximity of the Serramonte Mall and the transit site, a discussion in the EIR is required. It is our understanding that the Daly City traffic model only uses the current BART Specific Plan low intensity development as the site development option, which would significantly understate the potential trips generated by the proposed development.

**A02-10**

*Figure 4.13-5:* This figure shows a 5(3)% trip distribution down Collins Avenue. Project trips will come from Serramonte Boulevard, north of Collins Avenue (arrow and percentage should be moved north on the diagram adjacent to Serramonte Boulevard – support information in the EIR is correct).

**A02-11**

*Pg. 4.13-32 Impact Trans-4E:* This mitigation measure states that feasible mitigation is not available. While Caltrans controls the intersection, the right-of-way of Junipero Serra Boulevard is under the control and jurisdiction of the Town of Colma, and mitigation is feasible. As discussed at our meeting, a diagram was provided showing that ample right-of-way is available on Junipero Serra Boulevard south of Serramonte Boulevard. The project engineer should provide a diagram suggesting a possible design option to mitigate the impact and identify the steps to implement the improvement. The analysis should

**A02-12**



identify the mall expansion fair share percentage contribution to a future improvement by mall improvement phase.

A02-12  
cont.

*General Comment:* Consistent with Daly City General Plan Circulation Element Task CE-1.6, mitigation measures shall include construction of or financial contribution toward traffic improvements that can effectively mitigate the impact within a ten-year timeframe from the project approval date. The EIR should discuss how this guarantee will be secured by Daly City for off-site improvements required by the developer for this time frame.

A02-13

*Pg. 4.13-42 Impact Trans-8B:* The Town of Colma supports the implementation of Mitigation Measure Trans-8B, the optimization of the traffic signal green time at the intersection of Serramonte Boulevard and Junipero Serra Boulevard. This improvement should be implemented by the project proponent, with coordination with CalTrans, Colma and the City of Daly City. The Town of Colma will assist the project proponent and City of Daly City in any way required to assure the implementation of this mitigation measure during the first phase of the project. The proper functioning of this intersection is vital to the Daly City and Colma retail areas.

A02-14

*Pg. 4.13-42 Impact Trans-8C:* The Town of Colma supports the optimization of signal timing at the Serramonte and El Camino Real intersection. Since the project contributes impacts under the cumulative analysis, the mall developer should be involved in mitigation. The Town of Colma will assist Caltrans, the City of Daly City and the developer in the implementation of this measure.

A02-15

**Alternatives:**

*Pg. 6-2, Section 6.2.* The discussion of the No Project Alternative mentions the expiration of a lease by Sears, who is not a tenant of this mall.

A02-16

Thank you in advance for your consideration of these items. We look forward to working with you and the developer in implementing mitigation measures in the Town of Colma. Please contact me at (650) 757-8896 if you would like to discuss any items in this letter.

Sincerely,

  
Michael P. Laughlin AICP  
City Planner

A02-17

Cc: Town of Colma City Council  
Sean Rabe', City Manager

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# COMMENT LETTER # B01

-----Original Message-----

From: Zachary Moore [mailto:trains4ever14@gmail.com]

Sent: Saturday, March 28, 2015 4:41 PM

To: Steve Flint

Subject: Response To The Serramonte Shopping Center Expansion Draft Environmental Impact Report

Dear Mr. Steve Flint,

I am writing in response to the Draft Environmental Impact Report for the Serramonte Shopping Center Expansion Project. I live less than a mile from the Serramonte Shopping Center and I have many problems with this project.

**B01-01**

This project will lead to substantial increase in traffic not just in my neighborhood, but in the entire area surrounding the Serramonte Shopping Center. It used to take me five minutes to pass through the area surrounding the Serramonte Shopping Center, but now I fear it will take me fifteen to twenty minutes.

**B01-02**

If this project moves forward, there will need to be a traffic signal placed at the Intersection of Serramonte Blvd. and Callan Blvd., at the Intersection of Southgate Blvd. and Callan Blvd., and at the Intersection of Southgate Blvd. and Serramonte Center North.

**B01-03**

I also have concerns with the Interstate 280 exit at Serramonte Blvd. If no improvements occur at this exit, there will be severe traffic backups, with people trying to enter Interstate 280 from State Highway 1, and people trying to exit Interstate 280 at Serramonte Blvd. Accidents will be a regular occurrence.

**B01-04**

I believe the key to good economics is an equal balance of land use and an equal variety of business establishments. I believe we have not been successful at this. The plan for a medical building along Callan Blvd. is not a good idea because we already have medical buildings at Seton Hospital, along Southgate Ave., and along Hickey Blvd. The plan for a movie theater is also not a good idea because we have a movie theater up at the Daly City B.A.R.T. Station, as well as down at the Tanforan Mall in the City of San Bruno. The plan to demolish Daiso and replace it with a Supermarket is also not a good idea because we already have enough Supermarkets in the surrounding area.

**B01-05**

The plan to tear down Denny's is a horrible idea because we have a severe shortage of traditional full service American restaurants in this area. If they must close down Denny's, they should replace it with another traditional full service American restaurant such as Applebee's, Black Bear Diner, Claim Jumper, Home Town Buffet, Johnny Rockets, or Mountain Mike's, or they should bring back the Marie Callender's that they also closed down four years ago. If we lose Denny's, then that is another place that I can't have dinner with my family at.

**B01-06**

Thank you for listening to my concerns about this project.

Sincerely,

**B01-07**

A Concerned Daly City Resident

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