APPENDIX A
NOTICE OF PREPARATION AND COMMENT LETTERS
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

SERRAMONTE VIEWS CONDOMINIUMS AND HOTEL PROJECT
General Plan Amendment GPA-9-14-9640, Planned Development PD-9-14-9637,
Major Subdivision SUB-9-14-9643, and Design Review 9-14-9644

As the Lead Agency of the above project under the California Environmental Quality Act (CEQA), the City of Daly City will prepare an Environmental Impact Report (EIR) for the above referenced project and would like your input regarding the scope and content of the environmental information to be addressed in the EIR. The project description, location, and a brief summary of potential environmental effects are attached.

The proposed project would be situated on 6.07-acre site located on the south side of Serramonte Boulevard, between Callan Boulevard and Gellert Boulevard in Daly City. The project proposes to subdivide the property into two parcels, a 4.83-acre parcel to accommodate three residential condominium buildings and a 1.24-acre parcel to accommodate a hotel. The residential component of the project includes 270 condominium units. The condominium units would be constructed in up to 12-story structures above partially below-grade parking garages. The hotel portion of the project includes the construction of an 11-story building with 200 rooms above a six-story, partially below-grade podium parking garage.

On Thursday, July 14, the Daly City Planning Division will hold a public meeting to review the proposed scope and content of the Draft EIR, and to provide individuals, public agencies, and interest groups an opportunity to comment on what they feel the scope and content of the Draft EIR should be. The meeting will held in Daly City City Hall, First Floor Training Room, located at 333 90th Street, Daly City, between 3:00 p.m. to 4:00 pm.

Per State law, the deadline for your response is 30 days after receipt of this notice; however, we would appreciate an earlier response, if possible. If it is not possible for you to attend the meeting, the City will accept written comments until Friday, July 22, 2016, at 5:00 p.m.

If you intend to provide written comments, please identify a contact person in the comments and send them to:

Michael Van Lonkhuysen
City of Daly City – Planning Division
333 90th Street
Daly City, CA 94015
mvanlonkhuysen@dalycity.org

Should you have any questions concerning the project or the EIR scoping meeting, please feel free to contact Michael VanLonkhuysen in the Daly City Planning Division at (650) 991-8158.
Introduction

The purpose of an Environmental Impact Report (EIR) is to inform decision-makers and the general public of the environmental effects of a project that an agency may implement or approve. The EIR process is intended to provide information sufficient to evaluate a project and its potential for significant impacts on the environment, to examine methods of reducing adverse impacts, and to consider alternatives to the project.

The EIR for the proposed project will be prepared and processed in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended. In accordance with the requirements of CEQA, the EIR will include the following:

- A summary of the project;
- A project description;
- A description of the existing environmental setting, environmental impacts, and mitigation measures for the project;
- Alternatives to the project as proposed; and
- Environmental consequences, including (a) any significant environmental effects which cannot be avoided if the project is implemented; (b) any significant irreversible and irretrievable commitments of resources; (c) the growth inducing impacts of the proposed project; and (d) cumulative impacts.

Project Location

The 6.07-acre site is located on the south side of Serramonte Boulevard, between Callan Boulevard and Gellert Boulevard in Daly City. See Figures 1.1-1 and 1.1-2.

Project Description

The applicant proposes to subdivide the property into two parcels, a 4.83-acre parcel to accommodate three residential condominium buildings and a 1.24-acre parcel to accommodate a hotel.

The residential component of the project includes the construction of three new multi-family condominium buildings (Buildings A, B, and C) totaling 270 studio, one-, and two-bedroom condominiums. Each of the three buildings will have an entry lobby, miscellaneous residential amenities (fitness room, social room, etc.), and an open-space roof deck. The condominium units would be constructed in up to 12-story structures above partially below-grade parking garages. Buildings A and B would have approximately three levels of below-grade parking, with lobby entrances located on the ground floor. Building C would have a ground floor lobby entrance and two levels of below-grade parking. The overall proposed maximum height of Building A would be approximately 112 feet, and Buildings B and C would be 123 feet to the top of the building parapets from existing grade at the Serramonte Boulevard property line.

The hotel component (Building D) of the project includes the construction of an 11-story building with 200 rooms above a six-story, partially below-grade podium parking garage. The hotel amenities include a restaurant, small conference room, presentation room, two conference rooms, and a gallery/exhibition space.
Potential Environmental Impacts of the Project

The EIR will identify the significant environmental effects anticipated to result from construction of the proposed residential and hotel project. The EIR will include the following specific environmental categories as related to the proposed project:

1. **Land Use and Planning**

The EIR will describe the existing land uses within and/or adjacent to the proposed project site. Land use impacts that would occur as a result of the proposed project will be analyzed, including conformance with existing plans and policies of the City of Daly City. Mitigation measures will be identified for significant land use impacts, as warranted.

2. **Traffic and Circulation**

The project site is vacant and generates no traffic currently. A Transportation Impact Analysis will be prepared to identify the impacts of the residential and hotel uses to the existing local and regional transportation system. Mitigation measures will be identified for significant transportation impacts, as warranted.

3. **Biological Resources**

The project site occurs on an undeveloped hillside and contains numerous mature trees on-site and along the site perimeter. The EIR will describe the proposed removal of existing vegetation and new landscape plans. Mitigation measures will be identified for significant biological resource impacts, as warranted, including standard pre-construction survey mitigation measures to ensure that any trees on the site used for avian nesting are documented and protected for the duration of nesting activity in accordance with State and Federal law.

4. **Hydrology and Water Quality**

The EIR will describe existing hydrologic conditions in the project area and generally assess construction impacts that could result from implementation of the project. Program-level mitigation measures based upon the City’s Municipal Code and National Pollutant Discharge Elimination System (NPDES) permit requirements will be identified to minimize hydrological and water quality impacts. The EIR will discuss the project’s conformance with the Municipal Regional Permit based on a stormwater control plan and calculations of pre- and post-project construction impervious areas on the site. Mitigation measures will be identified for significant hydrology and water quality impacts, as warranted.

5. **Air Quality**

The EIR will describe the existing regional air quality conditions in the Bay Area. The potential for the proposed project to result in local and regional air quality impacts during both construction and operation will be evaluated as recommended in the Bay Area Air Quality Management District (BAAQMD) CEQA guidelines.

The project site is adjacent to existing housing southeast of Serramonte Boulevard which could be exposed to toxic air contaminants (TACs) during project construction. The EIR will provide an analysis of impacts resulting from construction TAC emissions upon nearby residences, and emissions
The project site is near several stationary (i.e., generators) and mobile (Interstate 280 and Highway 1) sources of TACs; therefore, future residents could be exposed to significant levels of air toxics. To address the potential community risk impacts, vehicular emissions along with all stationary source emissions within 1,000 feet of the project site will be assessed. Cancer risks, chronic and acute hazards, and annual PM$_{2.5}$ concentrations will be predicted at the project site. Mitigation measures will be developed as required to reduce identified resident exposures to acceptable levels.

6. **Greenhouse Gas Emissions**

New GHG emissions associated with the project will contribute incrementally to climate change. Project GHG emissions will be evaluated pursuant to current BAAQMD methodologies that quantify construction and operational GHG emissions. Results will be estimated as annual greenhouse gas emissions and annual emissions per service population (resident population and number of workers). These results will be compared against BAAQMD’s GHG significance thresholds. Mitigation measures such as reducing vehicle miles traveled, building to LEED certification, and waste minimization programs will be identified, if needed.

7. **Cultural Resources**

According to the City of Daly City 2030 General Plan EIR, there are multiple archaeological sites in the City from which artifacts have been uncovered. The project site is an undeveloped hillside and it is unlikely, though possible, that archaeological resources will be found on the site. The potential to impact cultural resources will be described in the EIR, including Tribal Cultural Resources as required under Assembly Bill (AB) 52. Mitigation measures will be identified for significant impacts, as warranted.

Neither the project site nor adjacent properties are listed on the California Register of Historic Places, the City of Daly City Historic Resources Inventory, or the San Mateo County Historic Resources Inventory.

8. **Noise**

The proposed project would locate a new noise-sensitive use near existing busy roadways and highways. The EIR will describe the anticipated noise level exposures for the proposed residences and hotel. The potential for the project construction to temporarily increase noise levels at nearby residences and other sensitive receptors will also be described. Mitigation measures will be identified to reduce significant noise impacts upon sensitive receptors, as warranted.

9. **Aesthetics**

The EIR will describe the existing visual setting and include photographs of the existing views. The visual changes resulting from the project will be evaluated based upon project plans, elevations, and illustrations. The EIR will evaluate the conceptual project design and its impacts on the surrounding neighborhood from public viewpoints. Mitigation measures will be discussed, as appropriate.
10. **Hazardous Materials**

The proposed residential and hotel project involves substantial excavation and grading. Depending on the historic use of the properties, hazardous materials may be present. The EIR will describe the potential for the proposed construction to result in hazardous material impacts. Mitigation measures to reduce significant hazardous material impacts will be identified, as warranted.

11. **Geology (Soils and Topography)**

The EIR will describe the existing geologic conditions of the project area and the potential for the project to result in significant geology and soil impacts. Mitigation measures to reduce significant geology and soil impacts will be identified, if necessary.

12. **Alternatives**

The EIR will evaluate possible alternatives to the proposed project, including the No Project Alternative. The alternative discussion will focus on those alternatives that could feasibly accomplish most of the basic purposes of the project while also avoiding or substantially lessening one or more of the significant effects.

13. **Significant Unavoidable Impacts**

The EIR will identify those significant impacts that cannot be avoided, if the project is implemented as proposed.

14. **Cumulative Impacts**

The potential for the proposed project, when considered with other past, present, and reasonably foreseeable future projects in the project area, to result in a significant cumulative impact will be evaluated in the EIR.

In conformance with the CEQA Guidelines, the EIR will also include the following sections: 1) consistency with local and regional plans and policies, 2) growth inducing impacts, 3) significant irreversible environmental changes, 4) references and organizations/persons consulted, and 5) EIR authors.
Notice of Preparation

June 27, 2016

To: Reviewing Agencies

Re: Serramonte Views Condominiums and Hotel Project
SCH# 2016062063

Attached for your review and comment is the Notice of Preparation (NOP) for the Serramonte Views Condominiums and Hotel Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Michael VanLonkhuyzen
Daly City
333 90th Street
Daly City, CA 94015

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

[Signature]
Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency
**Document Details Report**

**State Clearinghouse Data Base**

<table>
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<tr>
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<tr>
<td>Lead Agency</td>
<td>Daly City</td>
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**Type**  NOP  Notice of Preparation

**Description**  The proposed project would be situated on 6.07 acre site located on the south side of Serramonte Boulevard, between Callan Boulevard and Gellert Boulevard in Daly City. The project proposes to subdivide the property into two parcels, a 4.83 acre parcel to accommodate three residential condominium buildings and 1.24 acre parcel to accommodate a hotel. The residential component of the project includes 270 condominium units. The condominium units would be constructed in up to 12-story structures above partially below grade parking garages. The hotel portion of the project includes the construction of an 11 story building with 200 rooms above a six story, partially below grade podium parking garage.

**Lead Agency Contact**

<table>
<thead>
<tr>
<th>Name</th>
<th>Michael VanLonkhuyse</th>
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<tbody>
<tr>
<td>Agency</td>
<td>Daly City</td>
</tr>
<tr>
<td>Phone</td>
<td>650-691-8158</td>
</tr>
<tr>
<td>Address</td>
<td>333 90th Street</td>
</tr>
<tr>
<td>City</td>
<td>Daly City</td>
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<td>State</td>
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<tr>
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**Project Location**

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**Proximity to:**

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<td>Schools</td>
<td>Dan Webster/Jun Serra</td>
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<tr>
<td>Land Use</td>
<td>Vacant land/Planned Development zoning/Residential High Density</td>
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**Project Issues**  Air Quality; Biological Resources; Drainage/Absorption; Geologic/Seismic; Noise; Population/Housing Balance; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Landuse; Other Issues

**Reviewing Agencies**  Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 3; Native American Heritage Commission; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 4; State Water Resources Control Board, Division of Drinking Water, District 2; Regional Water Quality Control Board, Region 2

**Date Received**  06/27/2016  **Start of Review**  06/27/2016  **End of Review**  07/26/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.
Notice of Completion & Environmental Document Transmittal

**Mail to:** State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044  (916) 445-0613
**For Hand Delivery/Street Address:** 1400 Tenth Street, Sacramento, CA 95814

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**Project Title:** Serramonte Views Condominiums and Hotel Project

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<td>333 90th Street</td>
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<tr>
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**Document Type:**

- CEQA: [ ] NOP
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- CEQA: [ ] Neg Dec
- CEQA: [ ] Mit Neg Dec
- CEQA: [ ] NEPA: NOI
- CEQA: [ ] NEPA: Other
- CEQA: [ ] Final Document
- CEQA: [ ] FONSI
- NEPA: [ ] Final Document
- NEPA: [ ] FONSI
- NEPA: [ ] NOI
- NEPA: [ ] Other

**Local Action Type:**

- General Plan Update
- General Plan Amendment
- General Plan Element
- Community Plan
- Specific Plan
- Master Plan
- Rezone
- Use Permit
- Land Division (Subdivision, etc.)
- Annexation
- Redevelopment
- Coastal Permit
- Other:

**Development Type:**

- Residential: Units 270 Acres 4.83
- Office: Sq.ft. Acres Employees
- Commercial: Sq.ft. Acres Employees
- Industrial: Sq.ft. Acres Employees
- Educational:
- Recreational:
- Water Facilities/Type MGD
- Transportation: Type
- Mining: Mineral
- Power: Type MW
- Waste Treatment: Type MGD
- Hazardous Waste: Type
- Other: 200-room hotel on 1.24 acres

**Project Issues Discussed in Document:**

- Aesthetic/Visual
- Agricultural Land
- Air Quality
- Archeological/Historic
- Biological Resources
- Coastal Zone
- Drainage/Absorption
- Economic/Jobs
- Fiscal
- Flood Plain/Flooding
- Forest Land/Fire Hazard
- Geologic/Seismic
- Minerals
- Noise
- Population/Housing Balance
- Public Services/Facilities
- Recreation/Parks
- Schools/Universities
- Septic Systems
- Sewer Capacity
- Soil Erosion/Compaction/Grading
- Solid Waste
- Toxic/Hazardous
- Traffic/Circulation
- Vegetation
- Water Quality
- Water Supply/groundwater
- Wetland/Riparian
- Growth Inducement
- Land Use
- Cumulative Effects
- Other: Greenhouse gases

**Present Land Use/Zoning/General Plan Designation:**

Vacant land/Planned Development zoning/Residential High Density

**Project Description:** *(please use a separate page if necessary)*

The proposed project would be situated on 6.07-acre site located on the south side of Serramonte Boulevard, between Callan Boulevard and Gellert Boulevard in Daly City. The project proposes to subdivide the property into two parcels, a 4.83-acre parcel to accommodate three residential condominium buildings and a 1.24-acre parcel to accommodate a hotel. The residential component of the project includes 270 condominium units. The condominium units would be constructed in up to 12-story structures above partially below-grade parking garages. The hotel portion of the project includes the construction of an 11-story building with 200 rooms above a six-story, partially below-grade podium parking garage.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Revised 2010
## Resources Agency

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<tr>
<td>Dept. of Boating &amp; Waterways</td>
<td>Denise Peterson</td>
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<tr>
<td>California Coastal Commission</td>
<td>Elizabeth A. Fuchs</td>
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<td>Colorado River Board</td>
<td>Lisa Johansen</td>
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<td>Dept. of Conservation</td>
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<td>California Energy Commission</td>
<td>Eric Knight</td>
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<td>Cal Fire</td>
<td>Dan Foster</td>
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<td>Central Valley Flood Protection Board</td>
<td>James Herota</td>
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<td>Office of Historic Preservation</td>
<td>Ron Parsons</td>
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### Other Departments

- Food & Agriculture: Sandra Schubert, Dept. of Food and Agriculture
- Dept. of General Services: Public School Construction
- Dept. of Water Resources: Resources Agency, Nadell Gayou

### Fish and Game

- Dept. of Fish & Wildlife: Scott Flint, Environmental Services Division
- Fish & Wildlife Region 1: Curt Babcock

### Independent Commissions Boards

- Delta Protection Commission: Michael Machado
- CEQA Coordinator: Housing Policy Division

### County: San Mateo

#### OES (Office of Emergency Services)

- Monique Wilber

#### Native American Heritage Comm.

- Debbie Treadway

#### Public Utilities Commission

- Supervisor

#### Santa Monica Bay Restoration

- Guanyu Wang

#### State Lands Commission

- Jennifer Deleon

#### Tahoe Regional Planning Agency (TRPA)

- Candy Jacques

#### Cal State Transportation Agency CalSTA

- Caltrans - Division of Aeronautics
  - Philip Crimmins
- Caltrans - Planning
  - HQ LD-IGR
  - Terri Pencovic
- California Highway Patrol
  - Suzann Ikeuchi, Office of Special Projects

### Dept. of Transportation

- Caltrans, District 8: Mark Roberts
- Caltrans, District 9: Gayle Rosander
- Caltrans, District 10: Tom Dumas
- Caltrans, District 11: Jacob Armstrong
- Caltrans, District 12: Maureen El Harake

### Cal EPA

#### Air Resources Board

- Cathi Slaminski
  - Transportation Projects
  - Nesaneni Kalandiyur
- Industrial/Energy Projects
  - Mike Tolsstrup

#### State Water Resources Control Board

- Regional Programs Unit
  - Div. of Financial Assistance
- State Water Resources Control Board
  - Cindy Forbes - Aesst Deputy Division of Drinking Water

#### State Water Resources Control Board

- Div. Drinking Water # 2
- State Water Resources Control Board
  - Student Intern, 401 Water Quality Certification Unit Division of Water Quality

#### State Water Resources Control Board

- Phil Orader
  - Division of Water Rights

#### Dept. of Toxic Substances Control

- CEQA Tracking Center

#### Department of Pesticide Regulation

- CEQA Coordinator

### Regional Water Quality Control Board (RWQCB)

- RWQCB 1: Cathleen Hudson, North Coast Region (1)
- RWQCB 2: Environmental Document Coordinator, San Francisco Bay Region (2)
- RWQCB 3: Central Coast Region (3)
- RWQCB 4: Teresa Rodgers, Los Angeles Region (4)
- RWQCB 5: Central Valley Region (5)
- RWQCB 6: Lahontan Region (6)
- RWQCB 7: Colorado River Basin Region (7)
- RWQCB 8: Santa Ana Region (8)
- RWQCB 9: San Diego Region (9)

### Other

- Conservancy

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Last Updated 4/25/2016
July 8, 2016

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

RE: NOP Comments for Serramonte View Condominiums and Hotel Project

Dear Mr. VanLonkhuyzen:

Thank you for notifying the Town of Colma about the NOP for the Serramonte Views Condominium and Hotel project. In a review of the notice and project plans, the Town of Colma would like the EIR to include the study of the following topics:

**Traffic**

Given the significant amount of development recently built or expected in the City of Daly City, including the Serramonte Mall expansion, Gellert Marketplace and In-and-Out Burger, the traffic study will need to include (in addition to studied intersections in Daly City) the following:

1. **A study of the following intersections in the Town of Colma and South San Francisco:**
   a. Serramonte Boulevard and Junipero Serra Boulevard. Study of this intersection should include a stacking analysis of vehicles during weekday and weekend peak hours. In the Serramonte Mall EIR, a stacking impact was identified on Junipero Serra Boulevard northbound for the two left-hand turn lanes. This project will undoubtedly exacerbate this impact. If the project impact is found to be significant, the Town is requesting the study of an intersection improvement that includes an extension of the left turn pockets and widening/realignment of Junipero Serra Boulevard within the existing right-of-way. A preliminary improvement diagram which addresses the stacking impact should be included in the EIR as an exhibit.
   b. Junipero Serra Boulevard and Southgate Avenue
   c. Junipero Serra Boulevard and Hickey Boulevard
   d. Serramonte Boulevard and Serra Center Drive
   e. Serramonte Boulevard and El Camino Real

2. **An analysis of increased traffic during holiday periods.** The EIR should quantitatively address the known increase in traffic experienced in the region during November, December and early January of each year. Near gridlock conditions occur on the I-280 off-ramp, along Gellert Boulevard, on Hickey Boulevard, along Junipero Serra Boulevard and along the Serramonte Boulevard corridor during the holidays, particularly on weekends. Mitigation measures which require intersection improvements or impact fee contributions should factor in this additional traffic and the developer’s fair share contribution to these improvements.

3. **Mc Donald’s stacking impacts/illegal U-Turns at south mall entrance.** On weekdays during the school year, the Mc Donald’s drive-thru line extends onto Serramonte Boulevard blocking the number one travel lane just east of the project site during the AM Peak hour, and this condition
may occur at other times of the day. This condition must be factored into the project impacts since residents and hotel guests/employees will be exiting the project and immediately need to move to the number 2 lane of traffic upon exiting the project site. In addition, Mcdonald’s customer regularly make illegal u-turns from westbound Serramonte Boulevard at the south mall entrance signal, creating a hazard for motorists traveling westbound on Serramonte Boulevard. A practical solution would be to look for an opportunity for Mc Donald’s to reconfigure their site to extend the drive-through lane on their property.

4. A comprehensive list of probable future projects producing cumulative impacts. For the cumulative traffic analysis, the consultant should use a list which includes not only projects for which the City of Daly City has active applications or recently approved, but also where developer interest or preliminary plans have been submitted to the City. This includes the proposed mixed-use development surrounding the Colma BART station at the SamTrans park and ride lot, which was the subject of a City Council study session. If not quantitatively included in the analysis, a qualitative discussion should be included.

5. Shuttle Feasibility and Funding. The EIR should include a discussion of all feasible alternative ways to mitigate traffic impacts, including the requirement that the project fund and maintain (perhaps in cooperation with Serramonte Mall) regular free shuttle service to the Colma BART station for project residents, employees, shoppers and hotel guests.

6. Pedestrian and Bicycle Access and Improvements. The EIR should identify how vehicle trips for the project can be reduced by providing pedestrian and bicycle access to the project. The EIR should discuss pedestrian, bicycle and ADA right-of-way deficiencies in the vicinity of the project site and discuss the project’s obligation to provide improvements or fair-share contributions that will be necessary for project residents, hotel guests and employees to safely access the bus stop at Serramonte Mall, Serramonte Mall and shops/restaurants on Gellert Boulevard.

7. Clear mitigation triggers for intersection improvements and a clear discussion in the EIR. If a fee is required for a fair-share contribution to a traffic improvement instead of the construction of the improvement, the EIR should clearly state the extent of the developer’s contribution, the timing of the actual improvement, or the trigger for the improvement. The EIR should also state the funds already held by the City to improve the intersection where impacts occur and the total expected cost of intersection improvements. The discussion in the EIR should relate to the mitigation measures required for the Serramonte Mall project (Serramonte Mall MMRP, Page 1-10), and reference as an appendix the Mitigation Fee Program study that was required by the mall developer. This request is being made to assure that necessary traffic improvements are made prior to the impact occurring and to clearly disclose the developer’s obligations in relationship to other developments occurring in the vicinity.

Aesthetics

The project will create a significant visual change in the vicinity of the project. An analysis of the visual impacts, though the use of visual simulations, should include vantage points from Highway 280, Serramonte Boulevard east of the project site, Serramonte Boulevard west of the project site and from Highway 1 northbound.
Grading and Construction Impacts

The project description in the NOP did not indicate grading quantities. In a review of the project plans, it appears that the project will involve the removal of thousands of yards of material, requiring thousands of truck trips over an extended period of time. The EIR should discuss and fully disclose the haul route for this material and include a discussion of the project applicant’s obligation to prevent roadway damage, repair roadway damage and to keep surrounding streets clean during the construction process. A pre-construction photo survey of existing roadway conditions along the haul route may be appropriate.

Land Use

The project site is included in the General Plan Housing Element as one of the City’s housing sites with a density maximum of 50 units per acre. For the 4.83 acre housing site, this equates to a maximum of 241 housing units. The project proposes 270 units, which would be permissible under the current General Plan parameters if the project includes the appropriate number of affordable units to qualify for a state density bonus. If the project is not eligible for a density bonus but is instead requesting a General Plan Amendment for increased density for a market rate product, the EIR should include an extensive discussion on the justification for increased density for a site which is not adjacent to transit and which already has an unusually high permissible density given the residential densities in the vicinity of the site.

Park Facilities

The Daly City General Plan identifies that the City currently only provides 0.26 acres of parkland per 100 dwelling units, which is well below the State Recreation Commission standard of 2.6 acres of parkland per 100 dwelling units. General Plan Policy RME-12 encourages a “diverse, equitable and integrated system of park facilities throughout Daly City,...” The EIR should include a discussion of the impact of the project on recreation facilities since the addition of over 200 units in this location will give new residents limited convenient access to recreation facilities and further burden existing parks.

Alternatives

The EIR should include an analysis of a lower density alternative for the residential portion of the project that will lessen project impacts while still meeting most of the project objectives and which meets minimum Housing Element objectives.

Thank you in advance for your consideration of these items and we look forward to reviewing the draft EIR once it is prepared.

Sincerely,

Michael P. Laughlin AICP
City Planner

Cc: Town of Colma City Council
    Sean Rabe’, City Manager
    Christopher Diaz, City Attorney