

APPENDIX A
NOTICE OF PREPARATION AND
COMMENT LETTERS



CITY OF DALY CITY

333-90TH STREET
DALY CITY, CA 94015-1895

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.

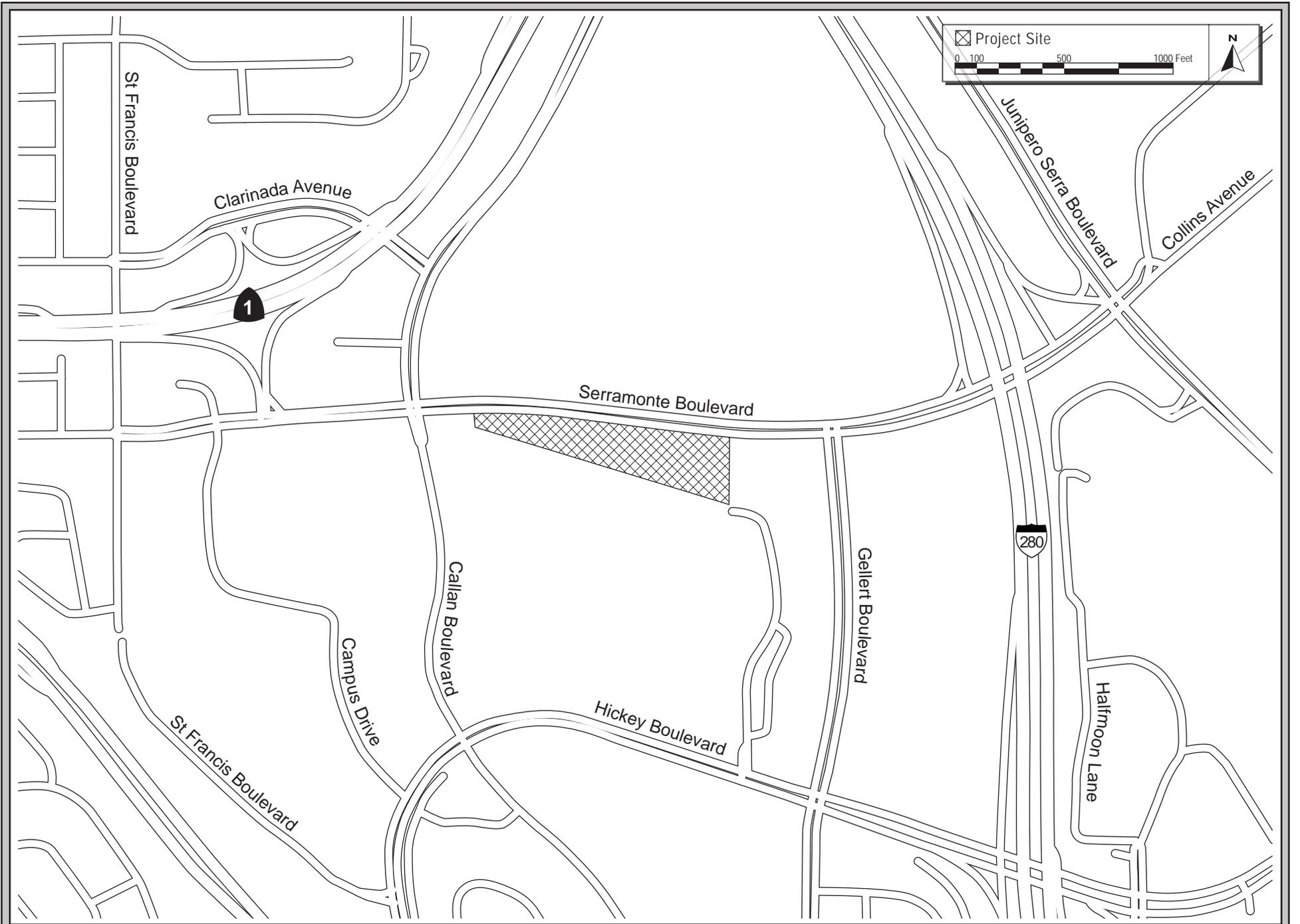
The residential component of the project includes the construction of three new multi-family condominium buildings (Buildings A, B, and C) totaling 270 studio, one-, and two-bedroom condominiums. Each of the three buildings will have an entry lobby, miscellaneous residential amenities (fitness room, 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.



REGIONAL MAP

FIGURE 1.1-1



VICINITY MAP

FIGURE 1.1-2

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

will be measured against BAAQMD thresholds for cancer risk and PM_{2.5} exposures at adjacent properties. Mitigation measures will be identified for significant air quality impacts, as warranted.

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.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

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 VanLonkhuysen
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,

Scott Morgan
Director, State Clearinghouse

SCANNED
6-29-16

Attachments
cc: Lead Agency

RECEIVED
JUN 29 2016
ECON/COM DEV DEPT

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016062063
Project Title Serramonte Views Condominiums and Hotel Project
Lead Agency Daly City

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

Name Michael VanLonkhuysen
Agency Daly City
Phone 650-991-8158 **Fax**
email
Address 333 90th Street
City Daly City **State** CA **Zip** 94015

Project Location

County San Mateo
City Daly City
Region
Cross Streets Serramonte and Gellert Blvds (south side of Serramonte Blvd)
Lat / Long 37° 40' 08.1" N / 122° 28' 14.9" W
Parcel No. 091-247-080
Township **Range** **Section** **Base**

Proximity to:

Highways I 280; HWY 1
Airports
Railways
Waterways
Schools Dan Webster/Jun Serra
Land Use Vacant land/Planned Development zoning/Residential High Density

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

Notice of Completion & Environmental Document Transmittal

2016062063

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

SCH #

Project Title: Serramonte Views Condominiums and Hotel Project

Lead Agency: City of Daly City

Contact Person: Michael VanLonkhuysen

Mailing Address: 333 90th Street

Phone: (650) 991-8158

City: Daly City

Zip: 94015

County: San Mateo

Project Location: County: San Mateo City/Nearest Community: City of Daly City

Cross Streets: Serramonte and Gellert Boulevards (south side of Serramonte Blvd) Zip Code: 94044

Longitude/Latitude (degrees, minutes and seconds): 37 ° 40 ' 08.1 " N / 122 ° 28 ' 14.9 " W Total Acres: 6.07

Assessor's Parcel No.: APN 091-247-080 Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: Interstate 280/Highway 1 Waterways: Schools: Dan Webster/Jun Serra

Airports: Railways: Schools: Dan Webster/Jun Serra

Document Type:

- CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other: FONSI

Governor's Office of Planning & Research

JUN 27 2016

STATE CLEARINGHOUSE

Local Action Type:

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

Development Type:

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

Project Issues Discussed in Document:

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

MJ

- Resources Agency
- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Denise Peterson
- California Coastal Commission
Elizabeth A. Fuchs
- Colorado River Board
Lisa Johansen
- Dept. of Conservation
Elizabeth Carpenter
- California Energy Commission
Eric Knight
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation
Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
Sue O'Leary
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Dept. of Water Resources
Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife
Scott Flint
- Environmental Services Division
- Fish & Wildlife Region 1
Curt Babcock
- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Craig Weighman
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
- Fish & Wildlife Region 6
Tiffany Ellis
- Fish & Wildlife Region 6 I/M
Heidi Calvert
- Dept. of Fish & Wildlife M
Becky Ota
- Food & Agriculture
Sandra Schubert
- Dept. of Food and Agriculture
- Dept. of General Services
Public School Construction
- Dept. of General Services
Cathy Buck/George Carollo
- Environmental Services Section
- Delta Stewardship Council
Keyvan Samsam
- Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division
- Independent Commissions Boards
Delta Protection Commission
Michael Machado

- OES (Office of Emergency Services)
Monique Wilber
- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Supervisor
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry 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 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North
- Caltrans, District 4
Patricia Maurice
- Caltrans, District 5
Larry Newland
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson

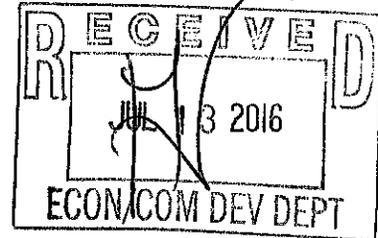
- Caltrans, District 8
Mark Roberts
- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake
- Air Resources Board
Airport & Freight
Cathi Slaminski
- Transportation Projects
Nesamani Kalandiyur
- Industrial/Energy Projects
Mike Tollstrup
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Cindy Forbes - Asst 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 Crader
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 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other _____



July 8, 2016

SCANNED
7-15-16



Mr. Michael VanLonkhuisen
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. VanLonkhuisen:

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, Mc Donald'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