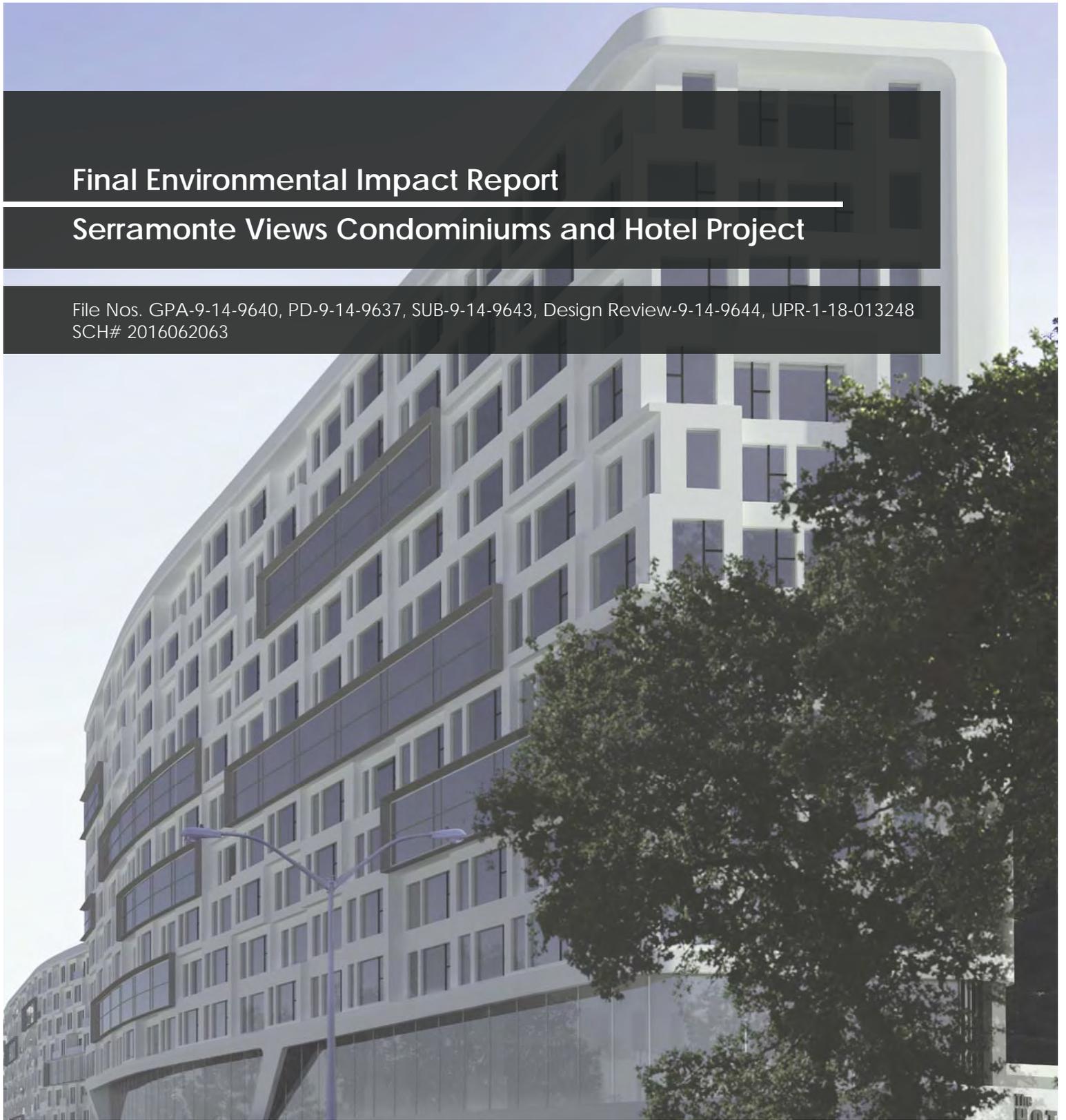


# Final Environmental Impact Report

## Serramonte Views Condominiums and Hotel Project

File Nos. GPA-9-14-9640, PD-9-14-9637, SUB-9-14-9643, Design Review-9-14-9644, UPR-1-18-013248  
SCH# 2016062063



Prepared by



In Consultation with



**DAVID J. POWERS**  
& ASSOCIATES, INC.  
ENVIRONMENTAL CONSULTANTS & PLANNERS

## PREFACE

---

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (FEIR) for the Serramonte Views project. The Draft EIR was circulated to affected public agencies and interested parties for a 45-day review period from January 24, 2018 to March 12, 2018. This volume consists of comments received by the City of Daly City (City), the Lead Agency on the Draft EIR, during the public review period, responses to those comments, and revisions to the text of the Draft EIR.

In conformance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the FEIR provides objective information regarding the environmental consequences of the proposed project. The FEIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The FEIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the FEIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the DEIR by making written findings for each of those significant effects.

According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
  - (1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.
  - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
  - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

In accordance with CEQA and the CEQA Guidelines, the FEIR will be made available to the public prior to consideration of the Environmental Impact Report. All documents referenced in this FEIR are available for public review in the office of the Department of Planning, Building and Code Enforcement, 333 90<sup>th</sup> Street, Daly City, CA 94015 on weekdays during normal business hours.

## TABLE OF CONTENTS

---

Section 1.0	LIST OF AGENCIES AND ORGANIZATIONS TO WHOM NOTICE OF THE DRAFT EIR WAS SENT .....	4
Section 2.0	LIST OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR.....	6
Section 3.0	RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR.....	7
Section 4.0	REVISIONS TO THE TEXT OF THE DRAFT EIR.....	28
Section 5.0	COPIES OF THE COMMENT LETTERS RECEIVED ON THE DRAFT EIR.....	34

## **SECTION 1.0 LIST OF AGENCIES AND ORGANIZATIONS TO WHOM NOTICE OF THE DRAFT EIR WAS SENT**

---

Copies of the Draft EIR and/or Notice of Availability for the Draft EIR were sent to the following agencies, organizations, and individuals:

### **State Agencies**

California Department of Transportation (District 4)  
California Department of Fish and Wildlife (Region 3)  
California Department of Water Resources  
California Department of Parks and Recreation  
California State Water Resources Control Board  
Native American Heritage Commission  
California Office of Emergency Services  
Regional Water Quality Control Board  
California Department of Toxic Substances Control  
California Highway Patrol  
SamTrans  
State Clearinghouse

### **Regional Agencies**

Association of Bay Area Governments  
County of San Mateo Health Policy and Planning  
Bay Area Air Quality Management District  
Metropolitan Transportation Commission

### **Local, Public, and Quasi-Public Agencies**

City/County Association Governments Airport Land Use Committee  
City/County Association Governments San Mateo County  
Town of Colma

### **Organizations, Businesses, and Individuals**

Aetos Chi Ming Chung  
Alto Serramonte LLC  
Azucena Maxino  
Benjamin Jayme  
Boris Slepniov  
Caran Colvin  
Chinese Cemetery Association  
Christian Fernandez  
Christina Camille Vergara  
Claude Salame  
Crown Colony Homeowners Association  
Cypress Point Homeowners Association  
Daly City Chamber of Commerce

Daly City COHRA  
Daly City Serramonte Center LLC  
Dan Manzon  
Dmitri Mayzus  
Fan Zhao  
Franchise Realty Interstate  
Gary Feliciano  
Greenbelt Alliance  
Housing Leadership Council of San Mateo County  
Hitoshi Kawamata  
Jefferson Elementary School District  
Jefferson Union High School District  
John Kelly  
Joselito Tengco  
Kam-Tong Lee  
Katherine Fung  
Leah Anne Luistro  
Loulia Nedzvetski  
Mario Escobar  
Merwin Lai  
Natalia Raysberg  
Original Daly City Protective Association  
Pacific Gas and Electric Company  
Pacific Services Group Inc.  
Perla Dizon  
Richard Brugger  
Rose Odone  
San Mateo County Board of Supervisors  
Serramonte Highlands Homeowners Association  
Serramonte Homeowners Association  
Serramonte Terraces LLC  
Sherry Brazil  
Skyline Pallasades Homeowners Association  
Southern Hills Homeowners Association  
Southport Land & Commercial Company  
St. Francis Heights Homeowners Association  
Stella Tse  
Sustainable San Mateo County  
Target Corporation Lessee  
Village Serramonte Homeowners Association

**SECTION 2.0 LIST OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR**

---

<u>State Agencies</u>	<u>Date of Letter</u>	<u>Response on Page</u>
A. Caltrans	March 7, 2018	7
<b><u>Local, Public, and Quasi-Public Agencies</u></b>		
B. City/County Association of Governments of San Mateo County	March 7, 2018	11
C. Town of Colma	March 12, 2018	12
<b><u>Organizations and Individuals</u></b>		
D. Betty Shepard	March 5, 2018	20
E. Cathy Pantazy	March 10, 2018	20
F. George Rodriguez	March 11, 2018	24
G. Aislinn De Leon	March 12, 2018	25
H. Marian Seiki	March 12, 2018	25
I. Nadine Baroudi Salame	June 2, 2018	26

## **SECTION 3.0      RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR**

---

The following section includes all the comments on the Draft EIR that were received by the City in letters and emails during the 45-day review period. The comments are organized under headings containing the source of the letter and the date submitted. The specific comments from each of the letters or emails are presented as “Comment” with each response to that specific comment directly following. Each of the letters submitted to the City of Daly City is attached in its entirety in Section 5.0 of this document.

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. Section 1.0 of this document lists all of the recipients of the Draft EIR.

One comment letter was received from a state agency and two comment letters were received from public agencies, none of whom are Responsible Agencies under CEQA for the proposed project. An additional five comments letters were received by individuals.

Regarding mitigation measures identified by commenting public agencies, the CEQA Guidelines state that:

Prior to the close of the public review period, a responsible agency or trustee agency which has identified what the agency considers to be significant environmental effects shall advise the lead agency of those effects. As to those effects relevant to its decisions, if any, on the project, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible or trustee agency is not aware of mitigation measures that address identified effects, the responsible or trustee agency shall so state. [§15086(d)]

The CEQA Guidelines state that the lead agency shall evaluate comments on the environmental issues received from persons who reviewed the DEIR and shall prepare a written response to those comments. The lead agency is also required to provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report. This FEIR contains written responses to all comments made on the Draft EIR received during the advertised 45-day review period. Copies of this FEIR have been supplied to all persons and agencies that submitted comments.

### **A.      RESPONSE TO COMMENTS FROM CALTRANS, MARCH 7, 2018:**

**COMMENT A-1:** Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Serramonte Vistas Residential Condominiums and Hotel (project). In tandem with the Metropolitan Transportation Commission’s (MTC) Sustainable

Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' Strategic Management Plan 2015-2020 aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the January 24, 2018 DEIR.

### Project Understanding

The project proposes to subdivide the 6.07-acre property into two parcels, a 4.76-acre parcel to accommodate three residential condominium buildings and a 1.30-acre parcel to accommodate a proposed hotel. The project is located at 525-595 Serramonte Boulevard. The residential component of the project includes the construction of three new multi-family condominium buildings comprising 323 one-, two-, and three- bedroom condominiums. The hotel component of the project includes the construction of a 12-story, 153,756 square-foot (sq. ft.) building with 176 rooms over a multi-level parking podium with 187 parking stalls. The proposed project is located approximately 0.33 miles south of the State Route (SR) 1/Interstate (I-) 280 interchange, situated between the two State facilities and accessed via Serramonte Boulevard.

### Multimodal Planning

This project will be sited in a location poorly conditioned to accommodate access by transit and active modes. The identified location alternative located in proximity to the Colma BART station would represent much better regional accessibility should be strongly considered. As proposed, the project should be conditioned to make improvements to nearby bicycle and transit facilities including the completion of bike lanes along Serramonte Boulevard between St. Francis Boulevard and Junipero Serra Boulevard, proposed in the Daly City General Plan Circulation Element (Circulation Element), as well as the improvement of SamTrans bus stops at Serramonte and Callan Boulevards (Stop IDs: 332264, 332263). These improvements would serve project employees, guests, and residents. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

**RESPONSE A-1:** The project area is already well-served by transit, with seven SamTrans bus routes that stop at the transit hub at Serramonte Shopping Center, less than one-quarter mile from the project entrance. These include four routes that directly serve a BART station.

The City recently awarded a project that will install bicycle routes on Serramonte Boulevard, in accordance with the City's current Bicycle Master Plan. The project is largely paid for by grant funds the City has received.

The project will improve pedestrian circulation by adding a sidewalk along the street frontage on the south side of Serramonte Boulevard, and adding a crosswalk between the project driveway and Serramonte Shopping Center.

**COMMENT A-2:** The project should provide bicycle facilities consistent with Circulation Element Policy CE-19: “Take proactive steps to ensure that owning and using a bicycle in Daly City is a viable transportation option.” Task CE-19.1 states that the City should “Require the provision of secure covered bicycle parking for large multifamily residential, commercial and office/institutional uses, and other key destinations, including public facilities such as transit stations.” While the City has not yet updated its zoning ordinance to reflect this task, the project should nonetheless take steps to provide secured bicycle parking for its residents.

Consider adopting policies and providing bicycle parking volumes consistent with City of San Francisco Ordinance 183-13, which sets the following standards for bicycle parking at large multifamily residential developments:

- One class I (long-term bicycle parking space such as locker, cage, or other secured facility) parking space for every 100 dwelling units up to 100 dwelling units, plus one class I parking space for every four dwelling units over 100.
- One class II (short-term bicycle parking space such as a standard bicycle rack) parking space for every twenty dwelling units.

Additionally, the ordinance requires the following bicycle parking spaces for hotels:

- One class I parking space for every 30 rooms.
- Two class II spaces per room, minimum two spaces, plus one class II space per 5,000 square feet of occupied conference, meeting, or function rooms.

**RESPONSE A-2:** As offered by the Applicant, the proposed project would provide 156 Class 1 bicycle parking spots, in a secure covered area – and 16 Class 2 bicycle parking spots, adjacent to the residential front entry. Additionally, the proposed hotel component of the project would provide six Class 1 bicycle parking spots, in a secure covered area, and six Class 2 bicycle parking spots, adjacent to the hotel front entry.

**COMMENT A-3:** The project’s primary and secondary effects on pedestrians, bicyclists, disabled travelers, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. New bicycle and pedestrian facilities should be built in accordance with current best practices and design standards. These smart growth approaches are consistent with MTC’s Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

**RESPONSE A-3:** As described in Section 2.7 of the Draft EIR, the project proposes bicycle parking facilities for residents and guests, and a bike repair station onsite. Existing pedestrian, bicycle, and transit facilities serve the project site. The project proposes sidewalk improvements along project frontages and would provide pedestrian access through the project site between Serramonte Boulevard and the Serramonte Shopping Center. The proposed pedestrian and bicycle facilities would be built in accordance with current best practices and design standards (refer to Response A-2).

#### **COMMENT A-4: Vehicle Trip Reduction**

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as Place Type 4c: Suburban Communities (Dedicated Use Areas) where location efficiency factors, such as community design, are weak and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Shuttle service for guests, residents, and employees serving transit centers and major regional destinations including San Francisco International Airport;
- Transit subsidies on an ongoing basis for residents and employees;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/formation in/of a transportation management association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

**RESPONSE A-4:** Shuttle service for the proposed project, residential and hotel uses, will be provided. As a condition of approval, the shuttle service would loop through the shopping center and the Colma BART Station at least twice between 7 AM and 9 AM and between 4 PM and 6 PM on weekdays. In addition to shuttle service, the project proposes other TDM

measures to reduce VMT including, but not limited to, reduced vehicle parking, charging stations and designated parking spaces for electric vehicles, secured bicycle storage facilities, and bicycle repair station(s).

**COMMENT A-5: Lead Agency**

As the Lead Agency, the City of Daly City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

**RESPONSE A-5:** Fair share calculations are not required as part of the CEQA document. The project's contribution to the traffic volumes at each intersection have been calculated, and these may be used to determine the fair share. As a condition of approval, the mitigations would be required prior to issuance of a building permit. The design to install a traffic signal at the intersection of Serramonte Boulevard/SR 1 Ramps is currently proposed to begin in FY 2020-21. Caltrans has not identified any specific mitigation measures on the State Transportation Network for which it believes the project is responsible.

**COMMENT A-6: Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 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/>.

**RESPONSE A-6:** An encroachment permit is not required as the project would not encroach onto the state ROW. No additional response is needed.

**B. RESPONSE TO COMMENTS FROM CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY, MARCH 7, 2018:**

**COMMENT B-1:** Thank you for offering C/CAG the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Serramonte Views Condominiums and Hotel project. The following comments are provided for your consideration in complying with the San Mateo County Congestion Management Program (CMP) Land Use Guidelines. In preparing an EIR for this project, refer to this policy, which is included as Appendix I of the 2017 CMP: <http://ccag.ca.gov/wp-content/uploads/2018/02/2017-Final-Draft-CMP-Appendix-1.pdf>.

Because the project is expected to generate a net of 100 or more peak-hour trips in either the AM or PM peak period on the CMP roadway network (274 trips in the PM peak hour), mitigation measures are required to reduce the impact of the project. Potential mitigation strategies are documented in the

Land Use Guidelines policy and include, but are not limited to, reducing project scope, building roadway and/or transit improvements, collecting traffic mitigation fees, and requiring project sponsors to implement transportation demand management (TDM) programs.

**RESPONSE B-1:** The project would provide pedestrian connectivity to the Serramonte Shopping Center by modifying the existing traffic signal to include a south leg and crosswalk on the east leg and providing a sidewalk along Serramonte Boulevard. The project would also provide shuttle service that would loop through the shopping center and the Colma BART Station at least twice a day between 7 AM and 9 AM and between 4 PM and 6 PM on weekdays.

The project would contribute a proportional fair share of the cost to signalize the intersection of the SR 1 Northbound Ramps and Serramonte Boulevard, which would improve the average intersection delay from LOS E to LOS C (*Section 2.7.2.3 Existing Plus Project Conditions*, MM TRANS-1.1). It should be noted that none of the study intersections are CMP intersections.

### **C. RESPONSE TO COMMENTS FROM TOWN OF COLMA, MARCH 12, 2018:**

#### **COMMENT C-1: Traffic**

In response to the Notice of Preparation, the Town of Colma requested the study of a series of intersections and other factors relating to traffic impacts to the Town. The following items listed in our letter of July 8, 2016 were not included in the Draft EIR and are requested to be addressed in the Final EIR:

1. A study of the following intersections in the Town of Colma:
  - a. Serramonte Boulevard and Junipero Serra Boulevard. While this intersection is included in the analysis for traffic volume and LOS, Study of this intersection should include a queuing analysis of vehicles during weekday and weekend peak hours. In the Serramonte Mall EIR, a queuing impact was identified on Junipero Serra Boulevard northbound for the two left hand turn lanes. This project will undoubtedly exacerbate this impact, and the queuing impact is requested to be quantified. Kittelson has performed recent work from the Town of Colma that can be added to the analysis. In addition, W-Trans recently prepared a queuing analysis, attached, which can be used as base data in the analysis. This information will assist the Town in determining the queuing impact to the intersection and possible fair-share contribution to future improvements at this intersection.
  - b. Junipero Serra Boulevard and Southgate Avenue.
  - c. Serramonte Boulevard and Serra Center Drive. The traffic analysis projects that 8%-10% of all project trips will use Serramonte Boulevard in Colma, and a discussion of this corridor must be included in the analysis. It is anticipated that numerous trips to and from the airport to and from the hotel will use Serramonte Boulevard and Hillside Boulevard in Colma.

- d. Serramonte Boulevard and El Camino Real (listed in the Draft EIR as providing local access to the site but not analyzed). As stated above, 8%-10% are projected to go through this intersection.

**RESPONSE C-1:** The selection of the study intersections was based on the anticipated origin/destination patterns of the vehicle-trips generated by the project and the corresponding assignment to the local and regional roadway network, based on output from the City of Daly City's regional travel demand model. Given that the project site is located in close proximity to I-280 and SR-1, it was projected that the majority of the trips would not utilize local streets. It is anticipated that the potential for impacts at the three intersections listed would be minimal.

Potential impacts to the intersection of Serramonte Boulevard and Junipero Serra Boulevard are discussed in responses C-1(a) to C-1(d).

**RESPONSE C-1(a):** The comment requests additional information on queue impacts at the intersection of Junipero Serra Boulevard and Serramonte Boulevard. Draft EIR Appendix E, page 35, Figure 9 shows that the proposed project would add traffic to one turn lane where queueing would be an issue, the northbound left-turn lanes on Junipero Serra Boulevard. The project would add 12 vehicles in the AM peak hour and 26 vehicles in the PM peak hour. Information provided by the Town of Colma indicates that the northbound left-turn lanes provide 590 feet of vehicle storage and current 95<sup>th</sup> percentile queues are 267 feet in the AM peak hour and 389 feet in the PM peak hour, with a maximum queue of 404 feet during the weekend peak hour. The traffic operations analysis included in the appendices to the Appendix E traffic study show that the proposed project would add up to 10 feet to the 95<sup>th</sup> percentile queue in the AM peak hour and up to 24 feet to the 95<sup>th</sup> percentile queue in the PM peak hour, with a maximum total queue of 428 feet under 2035 cumulative plus project traffic conditions. The total queue lengths would still be within the available storage length and there would be no queue impacts associated with the project at the intersection.

**RESPONSE C-1(b):** Draft EIR Appendix E, page 35, Figure 9 shows that the project would add a maximum of 11 directional peak hour vehicles to the section of Junipero Serra Boulevard north of Serramonte Boulevard, or six vehicles per lane per hour. This level of traffic would not be expected to have a significant impact on traffic operations on intersections north of Serramonte Boulevard, and therefore the intersection was not included as a study intersection.

**RESPONSE C-1(c):** Draft EIR Appendix E, page 35, Figure 9 shows that the project would add a maximum of 14 directional peak hour vehicles to the section of Serramonte Boulevard east of Junipero Serra Boulevard, or seven vehicles per lane per hour. This level of traffic would not be expected to have a significant impact on traffic operations on intersections east of Junipero Serra Boulevard, and therefore the intersection was not included as a study intersection.

**RESPONSE C-1(d):** Draft EIR Appendix E, page 35, Figure 9 shows that the project would add a maximum of 14 directional peak hour vehicles to the section of Serramonte Boulevard east of Junipero Serra Boulevard, or seven vehicles per lane per hour. A portion of this traffic would turn off of Serramonte Boulevard to access adjacent businesses (such as Serra Center) prior to reaching El Camino Real. This level of traffic would not be expected to have a significant impact on traffic operations on intersections east of Junipero Serra Boulevard, and therefore the intersection was not included as a study intersection.

**COMMENT C-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 1-280 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.

**RESPONSE C-2:** Since the project is not a retail project and, therefore, would not generate substantial additional traffic during the holiday season, the EIR is not required to include an analysis of peak period traffic during the holidays.

**COMMENT C-3:** McDonald's stacking impacts/illegal U-Turns at south mall entrance.

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 occurs at other times of the day. This condition must be factored into the project traffic and queuing impacts since residents and hotel guests/employees will immediately need to move to the number 2 lane of traffic upon exiting the project site. 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. Attached is a limited windshield survey of dates and times when a travel lane was observed to be blocked.

**RESPONSE C-3:** It is noted that the queuing observed at the McDonald's driveway would affect vehicles exiting the proposed project. However, the effects of this queuing at McDonald's would not create impacts relative to the significance criteria in the EIR. The proposed project would not cause additional impacts at this location relative to significance criteria beyond those described in the EIR.

**COMMENT C-4:** 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. This will greatly reduce VMT for the project. While the EIR states that the project is in a transit rich environment, it is likely that a majority of residents will not use the bus services at the mall, and will drive to their destination or to the BART station.

**RESPONSE C-4:** SamTrans Route 120 has stops on Serramonte Boulevard adjacent to the west end of the project site and directly serves the Colma BART station. Although, a separate parallel shuttle bus service was not determined to be necessary to provide adequate levels of transit service, the project proposes to provide shuttle service that would loop through the shopping center and the Colma BART Station at least twice a day between 7 AM and 9 AM and between 4 PM and 6 PM on weekdays.

**COMMENT C-5: 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. While the traffic analysis identifies existing conditions, the EIR should 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. The EIR should include this discussion in the context of how improvements will serve to reduce VMT for the project.

**RESPONSE C-5:** Page 88 of the Draft EIR describes pedestrian improvements that will be implemented as part of the project. The additional sidewalk and crosswalk would improve pedestrian access between the project, Serramonte Mall, and Gellert Marketplace as well as transit stops. Improved pedestrian and bicycle access to the project would be expected to help reduce vehicle trips and vehicle-miles of travel (VMT) generated by the project, but these reductions cannot be easily quantified. The traffic analysis in the Draft EIR conservatively assumed no reductions in vehicle traffic from the construction of pedestrian facilities when assessing potential traffic impacts.

**COMMENT C-6: 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.

**RESPONSE C-6:** During the issuance of a building permit and final tentative map approval, the EIR would require the collection of fair-share contribution funds from the developer for the SR 1 Northbound Ramps and Serramonte Boulevard intersection impact.

### **COMMENT C-7: Bike and Pedestrian Facilities and VMT Discussion**

The Draft EIR notes the presence of bikeways in the following locations. The following are Class III bikeways with extremely minimal signage:

- Callan Boulevard between Southgate Avenue and Serramonte Boulevard;
- Southgate Avenue between Junipero Serra Boulevard and St. Francis Boulevard; and
- Gellert Boulevard between Hickey Boulevard and King Drive (lanes start at Serra Vista Avenue, south of Hickey Boulevard)

The project, as proposed, could include 1,000 new residents and several hundred hotel guests at maximum occupancy. The EIR analysis should clearly state the developer's obligation to provide bicycle and sidewalk improvements (or pay an in-lieu fee) that will connect existing bikeways to one another (or upgrade of bikeways from Class III to Class II) in the vicinity of the project site. A priority should be the striping of a bike-lane on Callan Boulevard to Southgate Avenue and any other connections required to provide safe travel to and from the project site.

**RESPONSE C-7:** The City recently awarded a project that will install approximately 10 miles of bicycle routes remaining in the City's current Bicycle Master Plan. Construction is expected to commence in September 2018 and will be substantially completed by December 2018.

### **COMMENT C-8: Aesthetics**

The discussion in the EIR incorrectly states that the project "is in an urban neighborhood with tall buildings in the vicinity." Buildings at the mall, west of the project site, along Gellert Boulevard east of the project site and areas north of the project include buildings which are no more than 3 stories in height. The proposed buildings will be the tallest buildings in Daly City. The tallest buildings currently in Daly City are Seton Medical Center (9 Stories) and Daly City Station (10 Stories), both a significant distance from the site. The project introduces a building that is sixteen stories in height above a multi-level podium as viewed from Serramonte Boulevard looking west from Gellert Boulevard. The project does not comply with the Daly City General Plan. Specifically, the project is a massive contemporary development out of context with the area surrounding the site. In addition, the project creates an inhospitable blank wall at street level on Serramonte Boulevard. General Plan Task RME-20.4 requires that new development "incorporate design features in new development that reflect the character of the neighborhood." The project is a stark contrast to the existing neighborhood. In order for the project to meet this General Plan task, the project should transition in height from the existing one-story development adjacent to the site (Mc Donald's) and utilize terracing, buffering and landscaping techniques to transition the building mass to reflect the character of the largely one and two-story neighborhood surrounding the site.

**RESPONSE C-8:** The Seton Medical Center and Daly City Station are approximately one mile from each other, and the Seton Medical Center is approximately one mile from the project site, and therefore are generally in the vicinity of one another. While the project may seem larger in scale than the rest of the development in the area, Daly City is an urban city

with little room for expansion given all of the existing development. Therefore, in order to provide more opportunity for housing, per the Housing Element of the City's General Plan, taller buildings are necessary.

**COMMENT C-9:** The Town requested in our letter dated June 28, 2016, attached, that the EIR should include visual simulations with vantage points from Highway 280 and from Highway 1 northbound. These images are necessary to fully analyze the visual impacts of the project from these highways and provide decision makers with additional information on the visual impacts of the project.

**RESPONSE C-9:** The project site would not obstruct views of San Bruno Mountain from I-280 or SR 1, which is considered a scenic view in the City's General Plan. Therefore, visual simulations from I-280 or SR-1 were not deemed necessary as the project does not affect scenic views. As stated in *Section 2.1 Aesthetics* of the Draft EIR, the project site is not visible from any state or County designated scenic highways or roadways.

**COMMENT C-10:** Air Quality Impacts

The discussion in the EIR and Table 2.2.-3 regarding construction Criteria Pollutant Emissions takes the total number of construction days to determine that the daily average of pollutants is below the BAAQMD threshold. If the developer chooses to expedite construction activities, BAAQMD Thresholds could easily be exceeded for ROG, NO<sub>x</sub>, and particulate matter especially during the grading phase. A mitigation measure is necessary to establish a maximum level of construction activity per day to protect sensitive receptors in the vicinity of the project site and assure that daily construction activity does not exceed the assumptions provided in the construction schedule.

**RESPONSE C-10:** The construction activity assumptions for this project were based on the CalEEMod air model defaults for a project of this type and size, which provides for a conservative assessment of project construction emissions. Project construction impacts were then evaluated using BAAQMD-recommended methodology and, in fact, found construction NO<sub>x</sub> impacts to be potentially significant and are mitigated with MM AQ-2. If the project had an expedited construction schedule, as the commenter suggests, the total construction emissions that are averaged would be less since the total project construction schedule would be reduced, and, thus, the average estimated daily emissions would not be expected to change substantially. The emissions of construction criteria pollutants (ROG, NO<sub>x</sub> and particulate matter) are related to regional air quality impacts. The protection of sensitive receptors that the commenter mentions is addressed under section 2.2.2.3 "Expose sensitive receptors to substantial pollutant concentrations" which requires mitigation in the form of MM AQ-2, which ensures project emissions are minimized. No additional mitigation is necessary.

Furthermore, although not required as a project mitigation measure, the applicant has committed to installing 13 electric vehicle charging stations and providing electric service so that eventually as many as ten percent of the spaces in the project parking garage could ultimately accommodate such charging facilities.

## **COMMENT C-11: 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. Up to 270 units 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 already has an unusually high permissible density given the residential densities in the vicinity of the site.

**RESPONSE C-11:** Daly City is located in one of the least affordable housing markets in the country. The City of Daly City recognizes this fact and adopted an Affordable Housing Ordinance in 2014. The project proposes to make available 56 moderate-income units. As outlined in the Ordinance, its purposes include the following:

- To encourage the development and availability of housing affordable to a broad range of households with varying income levels within the City;
- To promote the City's goal to add affordable housing units to the City's housing stock in proportion to the overall increase in new jobs and housing units; and
- To offset the demand on housing that is created by new ownership and rental development and mitigate environmental and other impacts that accompany new residential development by protecting the economic diversity of the City's housing stock.

The Planning Division does not consider the proposed density of 66.9 housing units per acre as unusually high given the density of the following approved projects:

- 4619 Brunswick Street – 179 apartment units/acre
- 6098 Mission Street – 144 apartment units/acre
- 493 Eastmoor Avenue – 95 apartment units/acre
- 165 Pierce Street – 84 apartment units/acre
- 1590 Bryant Street – 77 apartment units/acre
- 88 Hillside Blvd – 52 apartments units/acre

These projects were also located near major roadways with lower density residential in the vicinity of the project site. Furthermore, like the housing developments above, the proposed project density advances numerous State, regional, and local policies with regard to the construction of infill housing on sites close to existing transportation networks, major job centers, shopping, and resident services. The proposed project, which would provide a shuttle service in the morning and evening commute hours, is 4.0, 1.2, and 2.4 miles from the Daly City, Colma, and South San Francisco BART Stations, respectively. The project would be constructed across the street from a regional shopping center at which exists a major Sam Trans transit hub (serving seven bus routes) which provides connections to the Daly City, Colma, and South San Francisco BART Stations, and other intercommunity destinations.

**COMMENT C-12: 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 323 units in this location will give new residents limited convenient access to improved recreation facilities necessary for families and further burden existing parks. The EIR does not address this direct impact, but instead only mentions regional open space amenities such as San Bruno Mountain.

**RESPONSE C-12:** The proposed project is located in a dense, urban area, with hilly topography. By nature of the site location and topography, the project residents would likely drive to parks (the closest park to the site is on the corner of Hickey Boulevard and Callan Boulevard) in the City of Daly City, as walking or biking would require crossing high volume roadways and/or walking/biking up steep slopes. The project would also include 36,257 square feet of common usable open space and private balconies totaling 13,810 square feet. The City of Daly City would maintain and increase the user capacity of its park facilities with the fees required by developers in lieu of dedicating park land elsewhere in Daly City.

**COMMENT C-13: Alternatives**

The EIR includes various alternatives which demonstrate that project objectives can be met, and that impacts can be reduced by considering a lower density alternative. The Town of Colma supports a lower residential density alternative since it would reduce traffic, will reduce the stark visual impact of the project (specifically building A), reduce impacts to parks and schools, and reduce the ongoing public service requirements of the new residents that may not be fully offset by property tax revenue. Development of a project that includes the current general plan maximum number of units (241 or 270 with a density bonus) along with the proposed 176-room hotel would provide the economic benefits of the hotel while minimizing effects to public services that new residents will require in perpetuity. A reduction in the number of residential units would allow for a lowering or terracing of residential tower A to better transition the building height to the lower density development to the east and allow the four towers to stair-step up Serramonte Boulevard with the topography.

**RESPONSE C-13:** This comment describes the Reduced Development Alternative and expresses an opinion to the City Council about the benefits of constructing this alternative over the proposed project. The comment has been acknowledged and no further response is necessary.

**COMMENT C-14: General Comment**

The Initial Study (prepared in January 2018) for the project (Appendix B) includes discussion and Mitigation Measures for Biology (BIO - 1.1 ), Cultural Resources (CUL - 1.1 to 1.4), Hazardous Materials (HAZ 1.1 , 2.1 ), Noise and Vibration (NV - 1.1 ). Hydrology and water quality impacts are

mitigated by MM GEO - 1.1 and MM HAZ - 1.1. However, MM GEO - 1.1 is referenced but not included in the Initial Study document, instead, it is in the Draft EIR which was prepared later. Having mitigation measures in the Initial Study and Draft EIR make it difficult for the reader to review all of the mitigation measures in one document. A suggestion would be to include a summary table of mitigation measures from the Initial Study in the summary section of the EIR.

**RESPONSE C-14:** A copy of the MMRP would be adopted as part of the project approvals that includes a description of all of the mitigation measures implemented by the project, during what timeframe the mitigation would occur, and who is responsible for implementing mitigation measures. As shown in *Section 4.0 Revisions to the Text of the Draft EIR*, the EIR summary has been revised to identify the Initial Study impacts and mitigation measures that would be included in the MMRP.

**D. RESPONSE TO COMMENTS FROM BETTY SHEPARD, MARCH 5, 2018:**

**COMMENT D-1:** I would like the link above to review Serramonte Views Condominiums and Hotel Project. I think relocating this project to the Serra Bowl site would be a great idea, less traffic and congestion for the St. Francis Height area, which is already busy. Hopefully the Associate Planner City of Daly City Economic and Community Development Department will subject this to the developers.

**RESPONSE D-1:** Per the traffic impact analysis prepared for the project, the project would add a total of 235 trips (or approximately four cars every minute) during the morning peak hour, and a total of 274 trips (five cars every minute) during the PM peak hour. The results of the intersection LOS analysis show that all study intersections would operate at an acceptable LOS D or better during the AM and PM peak hours of traffic, except for the intersection of SR 1 Northbound Ramps and Serramonte Boulevard. The project provides mitigation measure MM TRANS- 1.1 to improve the SR 1 Northbound Ramp and Serramonte Boulevard intersection from an LOS E to an acceptable LOS C standard.

Additionally, the developers, *Serramonte Terraces, LLC*, do not own the Serra Bowl site and therefore cannot construct the project on this property.

**E. RESPONSE TO COMMENTS FROM CATHY PANTAZY, MARCH 10, 2018:**

**COMMENT E-1:** There is little point in addressing, in detail, the Serramonte Views Condominiums and Hotel Project's DEIR as written because the conclusion is that there are two "Significant Unavoidable Cumulative Impacts" that prohibit the project, as submitted, from going forward (Freeways and intersection LOS).

**RESPONSE E-1:** The City of Daly City shall prepare a statement of overriding considerations upon project approval due to the significant unavoidable impacts which reflects the ultimate balance of competing public objectives, including environmental, legal, technical, social, and economic factors. A statement of overriding considerations supports

the lead agency's views on the ultimate balance of the merits of approving the project despite its effects on the environment.

**COMMENT E-2:** However, it is important to address the choice of the “Alternatives to the Project.” The city must identify the ‘environmentally superior alternative.’ And if that is ‘No Project,’ they then can further identify the environmentally superior alternative among the other alternatives (sort of a second chance to develop something).

**RESPONSE E-2:** CEQA requires that an EIR identify alternatives to a project as it is proposed. The CEQA Guidelines specify that the EIR should identify alternatives which “would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The purpose of this section is to determine whether there are alternatives of design, scope, or location which would substantially lessen the significant impacts, even if those alternatives “impede to some degree the attainment of the project objectives” or are more expensive (§15126.6). The Draft EIR included a range of alternatives to address the significant unavoidable impacts of the project as required by CEQA.

**COMMENT E-3:** It is always important to note that this particular project is located less than a mile from the very active San Andreas Fault. It is also within 8 miles of the San Gregorio Fault and the active Hayward and Calaveras Faults are within 18-24 miles of the site.

**RESPONSE E-3:** The project site is located in a seismically active region of the Bay Area, and while the likelihood of fault rupture at the project site is extremely low, strong ground shaking would likely occur at the project site during seismic activity throughout the life of the project. As a result, the project would be required to conform to the standard engineering and building practices and techniques specified in the California Building Code. The proposed buildings would be designed and constructed in accordance with the recommendations of a design-level geotechnical report prepared for the site, which identifies the specific design features related to the seismic conditions. Therefore, as stated in *Section 2.4.2.3 Seismicity and Seismic-Related Impacts* of the Draft EIR, the project would not result in significant impacts from seismic-related hazards.

**COMMENT E-4:** In addition, as noted in 2.4.2.2 Soil Impacts, “According to the geotechnical investigation, cemetery service road runoff onto the site has caused considerable erosion historically. Additionally, project excavation and grading will expose soils to wind and rain. Thus, there is potential for soil erosion on the project site.”

**RESPONSE E-4:** As stated in *Section 2.4.2.2 Soil and Groundwater Impacts*, MM GEO-1.1 requires preparation of a final design-level geotechnical investigation to address geology and soils impacts including soil erosion. The report would be reviewed and approved by the City prior to issuance of grading and/or building permits.

**COMMENT E-5: Alternatives**

*No Project - No Development* - This is the ‘hands-down’ best choice for the environment, but it does not generate any income for the city nor provide housing and lodging.

**RESPONSE E-5:** The comment is acknowledged. No response is required.

**COMMENT E-6: No Project Alternatives**

*Current entitlement* - I believe that this means that previously the city allowed a developer the right to construct a hotel with 137 rooms and 200 condominiums (337 total at full hotel occupancy), but the buildings were limited to 90 feet in height. The traffic impacting the freeways would be less because of fewer rooms/condos than the current project that cannot be built (see first sentence), but would still be significant. Again, another argument against this choice is that this option would mean the city would receive less from the transient occupancy tax (hotel) and less tax monies from fewer condominiums. But that would be true of the below as well.

**RESPONSE E-6:** No response is required since this comment does not ask any questions or raise any issue about the adequacy of the Draft EIR.

**COMMENT E-7: Reduced Development**

The city identified this option as the ‘Environmentally Superior Alternative’

This choice would reduce the number of condominiums to 156 and hotel rooms to 116 (271 total at full hotel occupancy). The impact of this size development would earn a ‘less than significant impact’ rating as far as clogging the freeway on-ramps and “substantial impact reduction” as far as intersections. The hotel and condos would afford additional housing and provide tax monies to the city.

Author’s Rebuttal- There is no indication here of the height or number of buildings that would be built with this ‘reduced development’ option. Would they all be half the size of the initial plan keeping 3 buildings for condos and one hotel? Would they incorporate the condo buildings into two tall ones? How would it look, and would the parking still be built in front with the buildings themselves recessed? Even if it were built with buildings from 6 to 8 stories high (rather than 12-17), these buildings would cast a shadow on Serramonte Blvd. putting it in the shade most of the day. The project’s entrances and exits all flow onto Serramonte Blvd. creating an enormous amount of additional traffic on Serramonte Blvd. and requiring modifications to the boulevard. Lastly, in the event of a strong earthquake, it would have catastrophic consequences for this heavily-traveled boulevard and to the people and their cars driving it. The potential for soil erosion on this project site still remains.

**RESPONSE E-7:** The Reduced Development Alternative would be similar in scale to the existing Planned Development zoning on the project site, which allows for construction of a 137-room hotel and 200 dwelling units. The purpose of the Reduced Development was to

achieve a reduction in total unit count to avoid the I-280 freeway impact, not to achieve a specific design related to the construction of the project or building of the project (i.e. building height, number of buildings, etc.). The Reduced Development Alternative is approximately 80 percent smaller in size in comparison to the existing zoning, suggesting that it could be designed as four buildings that are approximately four to five stories.

The Traffic Impact Analysis evaluated the conditions of the project driveway on the existing roadway network. The analysis estimated that an exclusive westbound left-turn lane into the project driveway since the project would generate 113 westbound left-turn vehicles during the PM peak hour. As stated in *Section 2.7.2.3 Existing Plus Project* conditions of the Draft EIR, re-striping the westbound approach on Serramonte Boulevard to provide a left-turn lane, two through lanes, and one right-turn lane would improve proposed driveway operations. Additionally, reconfiguring the signal to allow for a protected left-turn for the westbound approach and split phasing for the northbound and southbound approached would also improve project driveway operations.

In response to the seismic shaking and soil erosion issues, please see Responses D-3 and D-4 above.

**COMMENT E-8:** Design Alternative

This choice would have the same number of buildings, but they would have less height: one 11-story and two 9-story residential buildings, all one-bedrooms. The hotel would be 9 stories as well. This alternative would not lessen the traffic impact, or the potential for soil erosion.

**RESPONSE E-8:** This comment describes the Design Alternative in *Section 6.5.4* of the Draft EIR and expresses an opinion to the City Council about the benefits of constructing this alternative over the proposed project. The comment has been acknowledged and no further response is necessary.

**COMMENT E-9:** Location Alternative

The only alternate locations mentioned are the vacated Serra Bowl and the SamTrans Park & Ride lot sites. They are near the Colma Bart station located on Junipero Serra Blvd. and D Street. The land is flat (not the steep, slippery slope on Serramonte Blvd.); it is near Bart and there is more than one way to enter and exit the site. Currently, there is an offer on the property, but it has yet to be accepted. Is this the only site for development near BART?

The General Plan implies it wants to build these large developments near public transportation (would really help the environment), while selecting an ‘environmentally superior alternative.’ And it wants to provide a diversity of housing (low income et al). It also wants to generate income for the city via taxes on these entities. All of these goals would be met by moving the development to an alternate location, and some of the negatives would be avoided.

**RESPONSE E-9:** This comment describes the Location Alternative in *Section 6.5.5* of the Draft EIR and expresses an opinion to the City Council about the benefits of constructing this alternative over the proposed project. The comment has been acknowledged and no further response is necessary.

**COMMENT E-10:** I support the city's choice of the "Reduced Development" option in combination with the "Location Alternative," and suggest they build it on flat ground near BART. They can use the Serra Bowl site (if it becomes available and the pending public application is not accepted), or build on another site that is also near BART. It would make it easier to build on a flat surface that does not have the erosion concerns or as many earthquake worries. Since the project is reduced in size, it will not need as much property. Also, there is really no need to build the condos and hotel adjacent to one another. They can be built on separate lots.

Quoting from the DEIR on page xv, it states, "The Location alternative would meet many of the project objectives since it would construct high-density housing near transit thereby ensuring the project provides minimal disruption to traffic conditions in the area. Due to the gently sloping and developed sites proposed under the Location alternative, grading and tree removal would be minimized on the sites. Additionally, this alternative would provide additional housing types to diversify the housing mix in the City and provide additional residential development to support commercial development."

"The Location Alternative may reduce the traffic impacts and construction period impacts of the project while meeting the project objectives."

In conclusion, I favor reducing the size of the development by half, and building it next to public transportation such as BART. Use two sites if necessary, one for the condominiums and one for the hotel. There is no reason that they need to be built on the same site at the same time or adjacent to each other.

**RESPONSE E-10:** This comment is in support of a combination of the Reduced Development and Location Alternatives and expresses an opinion to the City Council about the benefits of constructing a combination of these alternatives over the proposed project. The comment has been acknowledged and no further response is necessary.

**F. RESPONSE TO COMMENTS FROM AISLINN DE LEON, MARCH 12, 2018:**

**COMMENT F-1:** I'm writing on behalf of myself and my extended family to voice our disagreement with the proposed housing development on Serramonte Blvd across from Serramonte mall.

At this point the traffic around that area is already challenging and I can't imagine what it would be like after adding more housing. The freeway exit for Serramonte is frequently backed up & is dangerous to navigate. Especially so during the holidays. Gellert Blvd is also very congested & we are gravely concerned with adding more traffic to the area.

Please reconsider the development and look at all aspects, traffic flow included, prior to moving forward.

**RESPONSE F-1:** The EIR evaluated the traffic conditions with the project at three freeway segments, providing access to the Serramonte Boulevard area. As discussed in *Section 2.7 Transportation*, the freeway LOS standard is D. The weaving section on I-280 southbound is planned for improvements by Caltrans, however, as explained in mitigation measure MM TRANS-2.1, the timing for such improvements is outside the City's jurisdiction and is not currently known.

The EIR also evaluated three intersections on Gellert Boulevard under Existing Plus Project conditions and were determined to operate at acceptable levels of service (LOS D or better).

Under the Existing Plus Project freeway conditions, all freeway segments would operate at LOS D or better, except for the weaving segment on I-280 southbound between SR 1 and Serramonte Boulevard, which would operate at LOS E without and with the project during the PM peak hour.

#### **G. RESPONSE TO COMMENTS FROM GEORGE RODRIGUEZ, MARCH 11, 2018:**

**COMMENT G-1:** We have seen the plans for redevelopment and are wondering why so much so soon. We are already experiencing the crush of cars on the road. The gridlock not only on the road but going shopping etc., will truly be getting worse with all of the redevelopment. The mayors and city councils of most of our cities have given in to the developers, why? They are building without even taking care of the infrastructure to handle the crush of people. Our quality of life is already being destroyed by turning homes into motel 6? What happened to protecting our residential communities? Our streets are jammed with cars and the streets are getting dirtier, dumping etc. Daly City used to be a nice and clean community. The treeless metropolis we see for the future is not what it should be. Not to worry, we have plenty of water.

**RESPONSE G-1:** This comment is acknowledged. No response is required since this comment does not ask any questions or raise any issue about the adequacy of the Draft EIR.

#### **H. RESPONSE TO COMMENTS FROM MARIAN SEIKI, MARCH 12, 2018:**

**COMMENT H-1:** Good morning. Just wanted to let you know my concerns regarding this outrageous development. The size is ridiculous and the traffic will be a nightmare!!!!

I not sure if you shop at the mall . Traffic ...the congestion is already at full capacity and that is ALL DAY LONG ....so if this complex happens people will be so stressed and full of rage and not even shop at the mall!!!!

Moving it Serra bowl lot is also not a good idea traffic on Junipero Serra Boulevard will be another nightmare for the freeway entrance. If you must build REDUCE THE SIZES OF OCCUPANCY no need for a 17 story or 15 story bldg. Please let me when this goes before the board for discussion

would like to attend. How does the Brown Act work... will you contact me via email or just post it on a board at City Hall???

**RESPONSE H-1:** The Traffic Impact Analysis evaluates the traffic conditions with the project. The result of the intersection LOS analysis under existing plus project conditions shows that all of the study intersections would operate at an acceptable LOS D or better during the AM and PM peak hours of traffic, with the exception of SR-1 northbound ramps and Serramonte Boulevard. The increase in delay at the SR 1 Northbound Ramps and Serramonte Boulevard would be mitigated by installing a new traffic signal (MM TRANS-1.1).

**I. RESPONSE TO COMMENTS FROM NADINE BAROUDI SALAME, JUNE 2, 2018**

**COMMENT I-1:** To whom it my concern,

I am a Daly City resident on Innisfree Dr, Cypress Point Community. I am emailing you to STRONGLY object the building of Serramonte View Condominium and Hotel Project...

The impact this project is going to have on this community is grave... and here is why:

Aesthetics: The 21 story building would be the tallest in Daly City and would tower above the area like a sore thumb. The overall complex would be huge and dominate the area. The original zoning for this property was for Buildings not to exceed 90 feet. The proposed project would require Zoning a change to allow building heights up to 255 feet. This is a 165 feet increase in allowable height. This project is a MASSIVE increase in size compared to current zoning proposals.

**RESPONSE I-1:** The tallest building (Building A) would be 17 stories and approximately 252 feet in height. The proposed project is located in an urban neighborhood with tall buildings in the vicinity (Seton Medical Center is located approximately one mile from the project site). The hotel would extend above the height of the existing ridgeline when viewed from the south by approximately 40 feet. The condominium towers would extend approximately 20 feet over the existing ridgeline. While the visual character of the site would change, the change is not considered a substantial degradation due to the urban environment in the vicinity of the project site, which includes a major regional mall, condominium residential buildings, and commercial thoroughfare development.

**COMMENT I-2:** Population Density: Daly City is already the second most densely populated City in California. This proposal would bring in families to fill the 323 units plus employees and guests for a 176 room hotel. All of this in a very narrow piece of land, cut far into a very steep hillside. This project requires a Zoning change to Very High Density, or more than 50 dwellings per acre.

**RESPONSE I-2:** Please see Response C-11 above of this Final EIR.

**COMMENT I-3:** Traffic: The recent development within the Serramonte Mall Complex has greatly increased the traffic in the area. Can you imagine what the traffic will be like when you add the traffic for 176 hotel rooms and the cars from the families occupying 323 housing units.

**RESPONSE I-3:** The Transportation Impact Analysis reports the project's effects on traffic conditions in the vicinity of the project. The results show that in the Existing Plus Project scenario, all intersections would operate at an acceptable level of service, with the exception of the SR 1 Northbound Ramps & Serramonte Boulevard intersection. The project would mitigate this impact by installing a traffic signal at the intersection which would reduce delay and allow the intersection to operate at an acceptable LOS C.

Under the Existing Plus Project freeway conditions, all freeway segments would operate at LOS D or better, except for the weaving segment on I-280 southbound between SR 1 and Serramonte Boulevard, which would operate at LOS E without and with the project during the PM peak hour. Caltrans is planning to implement improvements on the weaving section on I-280 southbound between SR 1 northbound off-ramp and the Serramonte Boulevard off-ramp which would reduce the project's impact, but since the freeway is under Caltrans' jurisdiction, the implementation and timing of the improvements to the affected segment are not under the City's control. For that reason, the impact is disclosed as significant and unavoidable.

**COMMENT I-4:** Parking: For 323 Condominium Units, the project has only designed 420 parking spaces. This is only 1.3 parking spots per unit on average. Drive around the Daly City area and you will notice few homes with only 1 car. Most housing units within the city probably average 2-4 cars per household. Where are the extra cars these residents are going to have going to park? I'll tell you where, in the surrounding neighborhoods which are already struggling to provide adequate parking for their residents.

**RESPONSE I-4:** The proposed project would be required to meet the Parking Demand Study prepared for the project. Parking is not considered an environmental impact analyzed under CEQA and, therefore, this comment is not further addressed.

**COMMENT I-5:** Last but not least... Environmental: Even the Cities own Environmental Impact Study states: "...the No Project Alternative is an environmentally superior alternative to the proposed project". "No Project Alternative would also allow for the development of the site under the existing General Plan land use designations. Currently the PD-57 zoning district allows the construction on a 137-room hotel and 200 condominium units with building heights up to 90 feet. Please vote no!!

**RESPONSE I-5:** This comment describes the No Project Alternative and expresses an opinion to the City Council about the benefits of constructing this alternative over the proposed project. The comment is acknowledged and no further response is necessary.

## SECTION 4.0 REVISIONS TO THE TEXT OF THE DRAFT EIR

This section contains revisions to the text of the Draft Environmental Impact Report for the Serramonte Views Condominiums and Hotel Project, dated January 2018. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page viii Summary; **REVISE** the first heading as follows:  
Summary of EIR Significant Impacts and Mitigation Measures

Page viii Summary; **INSERT** the following heading and table after the Summary of EIR Significant Impacts and Mitigation Measures:

### Summary of Initial Study Impacts and Mitigation Measures

<b>Impact</b>	<b>Mitigation Measures</b>
<b><u>Biological Resources</u></b>	
<p><u>Impact BIO-1: The project may disturb nesting birds on and adjacent to the site during construction.</u></p>	<p><u>MM BIO-1.1: In order to protect nesting birds on and adjacent to the project site the following measures will be implemented:</u></p> <ul style="list-style-type: none"> <li>• <u>Pre-construction nesting bird surveys shall be completed prior to tree removal if removal or construction is proposed to commence during the breeding season (February 1 to August 31) in order to avoid impacts to nesting birds. Surveys shall be completed by a qualified biologist no more than 14 days before construction begins. During this survey, the biologist or ornithologist shall inspect all trees and other possible nesting habitats in and within 250 feet of the project boundary.</u></li> <li>• <u>If an active nest is found in an area that would be disturbed by construction, the ornithologist shall designate an adequate buffer zone (~250 feet) to be established around the nest, in consultation with the California Department of Fish and Wildlife (CDFW). The buffer would ensure that nests shall not be disturbed until the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts.</u></li> <li>• <u>The applicant shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the Director of</u></li> </ul>

	<p><u>Community Development, prior to the issuance of a grading permit or demolition permit.</u></p>
<p><b><u>Cultural Resources</u></b></p>	
<p><u>Impact CUL-1: Construction of the proposed project and associated off-site improvements could result in significant impacts to archaeological resources, unique paleontological resources/sites, unique geologic features, or human remains, if present on-site.</u></p>	<p><b><u>MM CUL-1.1: Unique Paleontological and/or Geologic Features and Reporting.</u></b> Should a unique paleontological resource or site or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the City Planning Manager notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. The identified mitigation measures shall be implemented. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is carried out. Upon completion of the paleontological assessment, a report shall be submitted to the City and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.</p> <p><b><u>MM CUL-1.2: Undiscovered Archaeological Resources.</u></b> If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity (“midden”), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for</p>

Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

**MM CUL-1.3: Human Remains.** If human remains are discovered at any project construction site during any phase of construction, all ground disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager and the San Mateo County coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Daly City shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of Daly City, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

**MM CUL-1.4: Report of Archaeological Resources.** If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City's Planning Manager prior to issuance of building permits. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and



	<ul style="list-style-type: none"><li>• <u>Use quiet construction equipment whenever possible;</u></li><li>• <u>Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Compressed air exhaust silencers shall be used on other equipment. Other quieter procedures, such as drilling rather than using impact equipment, shall be used whenever feasible;</u></li><li>• <u>Prohibit unnecessary idling of internal combustion engines; and</u></li><li>• <u>Select routes for movement of construction-related vehicles and equipment in conjunction with the Daly City Community Development Department so that noise-sensitive areas, including residences and schools, are avoided as much as possible.</u></li><li>• <u>The project sponsor shall designate a “disturbance coordinator” for construction activities. The coordinator would be responsible for responding to any local complaints regarding construction noise and vibration. The coordinator would determine the cause of the noise or vibration complaint and would implement reasonable measures to correct the problem.</u></li><li>• <u>The construction contractor shall send advance notice to neighborhood residents within 300 feet of the project site regarding the construction schedule and including the telephone number for the disturbance coordinator at the construction site.</u></li></ul>
--	--

Appendix B Section 4.9 Hydrology and Water Quality; **REVISE** CEQA Checklist on page 54 to mark questions 7 and 8 to show No Impact, as shown below:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
7. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1-3,14
8. Place within a 100-year flood hazard area structures which will impede or redirect flood flows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1-3,14

**SECTION 5.0 COPIES OF THE COMMENT LETTERS RECEIVED ON  
THE DRAFT EIR**

---

The original comment letters received on the Draft EIR are provided on the following pages.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

FAX (510) 286-5559

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life.*

March 7, 2018

SCH #2016062063

GTS # 04-SM-2016-00154

GTS ID: 283

PM: SM – 280 – R24.65

Mr. Corey Alvin  
City of Daly City  
333 90th Street  
Daly City, CA 94015

**Serramonte Vistas Residential Condominiums and Hotel – Draft Environmental Impact Report (DEIR)**

Dear Mr. Corey Alvin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Serramonte Vistas Residential Condominiums and Hotel (project). In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the January 24, 2018 DEIR.

***Project Understanding***

The project proposes to subdivide the 6.07-acre property into two parcels, a 4.76-acre parcel to accommodate three residential condominium buildings and a 1.30-acre parcel to accommodate a proposed hotel. The project is located at 525-595 Serramonte Boulevard. The residential component of the project includes the construction of three new multi-family condominium buildings comprising 323 one-, two-, and three- bedroom condominiums. The hotel component of the project includes the construction of a 12-story, 153,756 square-foot (sq. ft.) building with 176 rooms over a multi-level parking podium with 187 parking stalls. The proposed project is located approximately 0.33 miles south of the State Route (SR) 1/Interstate (I-) 280 interchange, situated between the two State facilities and accessed via Serramonte Boulevard.

### ***Multimodal Planning***

This project will be sited in a location poorly conditioned to accommodate access by transit and active modes. The identified location alternative located in proximity to the Colma BART station would represent much better regional accessibility should be strongly considered. As proposed, the project should be conditioned to make improvements to nearby bicycle and transit facilities including the completion of bike lanes along Serramonte Boulevard between St. Francis Boulevard and Junipero Serra Boulevard, proposed in the *Daly City General Plan Circulation Element (Circulation Element)*, as well as the improvement of SamTrans bus stops at Serramonte and Callan Boulevards (Stop IDs: 332264, 332263). These improvements would serve project employees, guests, and residents. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

The project should provide bicycle facilities consistent with *Circulation Element Policy CE-19*: “Take proactive steps to ensure that owning and using a bicycle in Daly City is a viable transportation option.” Task CE-19.1 states that the City should “Require the provision of secure covered bicycle parking for large multifamily residential, commercial and office/institutional uses, and other key destinations, including public facilities such as transit stations.” While the City has not yet updated its zoning ordinance to reflect this task, the project should nonetheless take steps to provide secured bicycle parking for its residents.

Consider adopting policies and providing bicycle parking volumes consistent with City of San Francisco Ordinance 183-13, which sets the following standards for bicycle parking at large multifamily residential developments:

- One class I (long-term bicycle parking space such as locker, cage, or other secured facility) parking space for every 100 dwelling units up to 100 dwelling units, plus one class I parking space for every four dwelling units over 100.
- One class II (short-term bicycle parking space such as a standard bicycle rack) parking space for every twenty dwelling units.

Additionally, the ordinance requires the following bicycle parking spaces for hotels:

- One class I parking space for every 30 rooms.
- Two class II spaces per room, minimum two spaces, plus one class II space per 5,000 sq. ft. of occupied conference, meeting, or function rooms.

The project’s primary and secondary effects on pedestrians, bicyclists, disabled travelers and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. New bicycle and pedestrian facilities should be built in accordance with current best practices and design standards. These smart growth approaches are consistent with MTC’s

Regional Transportation Plan/Sustainable Community Strategies and would help meet Caltrans Strategic Management targets.

### ***Vehicle Trip Reduction***

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4c: Suburban Communities (Dedicated Use Areas)** where location efficiency factors, such as community design, are weak and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Shuttle service for guests, residents, and employees serving transit centers and major regional destinations including San Francisco International Airport;
- Transit subsidies on an ongoing basis for residents and employees;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Showers, changing rooms and clothing lockers for employees that commute via active transportation;
- Emergency Ride Home program;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating*

Mr. Corey Alvin, City of Daly City  
March 7, 2018  
Page 4

*Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8).  
The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

***Lead Agency***

As the Lead Agency, the City of Daly City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the state ROW requires an encroachment permit that is issued by the Department. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating state ROW must be submitted to: Office of Permits, California DOT, District 4, P.O. Box 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/>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at 510-286-5518 or [jake.freedman@dot.ca.gov](mailto:jake.freedman@dot.ca.gov).

Sincerely,



PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse



Atherton • Belmont • Brisbane • Burlingame • Colma • Daly City • East Palo Alto • Foster City • Half Moon Bay • Hillsborough • Menlo Park  
Millbrae • Pacifica • Portola Valley • Redwood City • San Bruno • San Carlos • San Mateo • San Mateo County • South San Francisco • Woodside

March 7, 2018

Corey Alvin  
Associate Planner  
City of Daly City, Economic and Community Development Department  
333 90<sup>th</sup> Street  
Daly City, CA 94015

**RE: Draft Environmental Impact Report for the proposed Serramonte Views Condominiums and Hotel Project in the City of Daly City**

Dear Mr. Alvin:

Thank you for offering C/CAG the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Serramonte Views Condominiums and Hotel project. The following comments are provided for your consideration in complying with the San Mateo County Congestion Management Program (CMP) Land Use Guidelines. In preparing an EIR for this project, refer to this policy, which is included as Appendix I of the 2017 CMP: <http://ccag.ca.gov/wp-content/uploads/2018/02/2017-Final-Draft-CMP-Appendix-1.pdf>.

Because the project is expected to generate a net of 100 or more peak-hour trips in either the AM or PM peak period on the CMP roadway network (274 trips in the PM peak hour), mitigation measures are required to reduce the impact of the project. Potential mitigation strategies are documented in the Land Use Guidelines policy and include, but are not limited to, reducing project scope, building roadway and/or transit improvements, collecting traffic mitigation fees, and requiring project sponsors to implement transportation demand management (TDM) programs.

We request the opportunity to review and comment on the TIA, EIR, and project TDM plan (if applicable) upon their completion. If you have any questions, please contact me at [jlacap@smcgov.org](mailto:jlacap@smcgov.org) or 650-599-1455.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey Lacap', written over a white background.

Jeffrey Lacap  
Transportation Programs Specialist



March 12, 2018

Mr. Corey Alvin  
City Hall - Daly City Planning Division  
333 - 90th Street  
Daly City, CA 94015

**RE: EIR Comments for Serramonte Vistas Condominiums and Hotel Project**

Dear Mr. Alvin:

Thank you for notifying the Town of Colma about the Draft Environmental Impact Report for the Serramonte Vistas Condominium and Hotel project. In a review of the draft EIR, the Town of Colma would like to submit the following comments:

**Traffic**

In response to the Notice of Preparation, the Town of Colma requested the study of a series of intersections and other factors relating to traffic impacts to the Town. The following items listed in our letter of July 8, 2018 were not included in the Draft EIR and are requested to be addressed in the Final EIR:

1. *A study of the following intersections in the Town of Colma:*
  - a. Serramonte Boulevard and Junipero Serra Boulevard. While this intersection is included in the analysis for traffic volume and LOS, Study of this intersection should include a queuing analysis of vehicles during weekday and weekend peak hours. In the Serramonte Mall EIR, a queuing impact was identified on Junipero Serra Boulevard northbound for the two left hand turn lanes. This project will undoubtedly exacerbate this impact, and the queuing impact is requested to be quantified. Kittelson has performed recent work from the Town of Colma that can be added to the analysis. In addition, W-Trans recently prepared a queuing analysis, attached, which can be used as base data in the analysis. This information will assist the Town in determining the queuing impact to the intersection and possible fair-share contribution to future improvements at this intersection.
  - b. Junipero Serra Boulevard and Southgate Avenue.
  - c. Serramonte Boulevard and Serra Center Drive. The traffic analysis projects that 8%-10% of all project trips will use Serramonte Boulevard in Colma, and a discussion of this corridor must be included in the analysis.<sup>1</sup> It is anticipated that numerous trips to and from the airport to and from the hotel will use Serramonte Boulevard and Hillside Boulevard in Colma.
  - d. Serramonte Boulevard and El Camino Real<sup>2</sup> (listed in the Draft EIR as providing local access to the site but not analyzed). As stated above, 8%-10% are projected to go through this intersection.

---

<sup>1</sup> Appendix E, Traffic Analysis, Figure 7 and Figure 8

<sup>2</sup> Draft EIR, Section 2.7.1.3, pg. 78



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.* 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 occurs at other times of the day. This condition must be factored into the project traffic and queuing impacts since residents and hotel guests/employees will immediately need to move to the number 2 lane of traffic upon exiting the project site. 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. Attached is a limited windshield survey of dates and times when a travel lane was observed to be blocked.
4. *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. This will greatly reduce VMT for the project. While the EIR states that the project is in a transit rich environment, it is likely that a majority of residents will not use the bus services at the mall, and will drive to their destination or to the BART station.
5. *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. While the traffic analysis identifies existing conditions, the EIR should 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. The EIR should include this discussion in the context of how improvements will serve to reduce VMT for the project.
6. *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.



## **Bike and Pedestrian Facilities and VMT Discussion**

The Draft EIR notes the presence of bikeways in the following locations<sup>3</sup>. The following are Class III bikeways with extremely minimal signage:

- Callan Boulevard between Southgate Avenue and Serrramonte Boulevard;
- Southgate Avenue between Junipero Serra Boulevard and St. Francis Boulevard; and
- Gellert Boulevard between Hickey Boulevard and King Drive (lanes start at Serravista, south of Hickey Boulevard)

The project, as proposed, could include 1,000 new residents and several hundred hotel guests at maximum occupancy. The EIR analysis should clearly state the developer's obligation to provide bicycle and sidewalk improvements (or pay and in-lieu fee) that will connect existing bikeways to one another (or upgrade of bikeways from Class III to Class II) in the vicinity of the project site. A priority should be the striping of a bikelane on Callan Boulevard to Southgate Avenue and any other connections required to provide safe travel to and from the project site.

## **Aesthetics**

The discussion in the EIR incorrectly states that the project "is in an urban neighborhood with tall buildings in the vicinity."<sup>4</sup> Buildings at the mall, west of the project site, along Gellert Boulevard east of the project site and areas north of the project include buildings which are no more than 3 stories in height. The proposed buildings will be the tallest buildings in Daly City. The tallest buildings currently in Daly City are Seaton Medical Center (9 Stories) and Daly City Station (10 Stories), both a significant distance to form the site. The project introduces a building that is sixteen stories in height above a multi-level podium as viewed from Serrramonte Boulevard looking west from Gellert Boulevard. The project does not comply with the Daly City General Plan. Specifically, the project is a massive contemporary development out of context with the area surrounding the site. In addition, the project creates an inhospitable blank wall at street level on Serrramonte Boulevard. General Plan Task RME-20.4 requires that new development "incorporate design features in new development that reflect the character of the neighborhood." The project is a stark contrast to the existing neighborhood. In order for the project to meet this General Plan task, the project should transition in height from the existing one-story development adjacent to the site (Mc Donald's) and utilize terracing, buffering and landscaping techniques to transition the building mass to reflect the character of the largely one and two-story neighborhood surrounding the site.

The Town requested in our letter dated June 28, 2016, attached, that the EIR should include visual simulations with vantage points from Highway 280 and from Highway 1 northbound. These images are necessary to fully analyze the visual impacts of the project from these highways and provide decision makers with additional information on the visual impacts of the project.

## **Air Quality Impacts**

The discussion in the EIR and Table 2.2.-3<sup>5</sup> regarding construction Criteria Pollutant Emissions takes the total number of construction days to determine that the daily average of pollutants is below the BAAQMD threshold. If the developer chooses to expedite construction activities, BAAQMD Thresholds

---

<sup>3</sup> Draft EIR, Section 2.7.1.3, pg. 79

<sup>4</sup> Draft EIR, Section 2.1..2.2, pg. 30

<sup>5</sup> Draft EIR, Section 2.2.2.2, pg. 39



could easily be exceeded for ROG, NO<sub>x</sub>, and particulate matter especially during the grading phase. A mitigation measure is necessary to establish a maximum level of construction activity per day to protect sensitive receptors in the vicinity of the project site and assure that daily construction activity does not exceed the assumptions provided in the construction schedule.

### **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. Up to 270 units 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 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 323 units in this location will give new residents limited convenient access to improved recreation facilities necessary for families and further burden existing parks. The EIR does not address this direct impact, but instead only mentions regional open space amenities such as San Bruno Mountain.

### **Alternatives**

The EIR includes various alternatives which demonstrate that project objectives can be met, and that impacts can be reduced by considering a lower density alternative. The Town of Colma supports a lower residential density alternative since it would reduce traffic, will reduce the stark visual impact of the project (specifically building A), reduce impacts to parks and schools, and reduce the ongoing public service requirements of the new residents that may not be fully offset by property tax revenue. Development of a project that includes the current general plan maximum number of units (241 or 270 with a density bonus) along with the proposed 176 room hotel would provide the economic benefits of the hotel while minimizing effects to public services that new residents will require in perpetuity. A reduction in the number of residential units would allow for a lowering or terracing of residential tower A to better transition the building height to the lower density development to the east and allow the four towers to stair-step up Serramonte Boulevard with the topography.

### **General Comment**

The Initial Study (prepared in January 2018) for the project (Appendix B) includes discussion and Mitigation Measures for Biology (BIO – 1.1), Cultural Resources (CUL – 1.1 to 1.4), Hazardous Materials (HAZ 1.1, 2.1), Noise and Vibration (NV – 1.1). Hydrology and water quality impacts are mitigated by MM GEO – 1.1 and MM HAZ – 1.1. However, MM GEO – 1.1 is referenced but not included in the Initial Study document, instead, it is in the Draft EIR which was prepared later. Having mitigation measures in the Initial Study and Draft EIR make it difficult for the reader to review all of the



TOWN OF COLMA  
PLANNING DEPARTMENT

1198 El Camino Real • Colma, California 94014  
Phone: (650) 757-8888 • FAX: (650) 757-8890

---

mitigation measures in one document. A suggestion would be to include a summary table of mitigation measures from the Initial Study in the summary section of the EIR.

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

Sincerely,

Michael P. Laughlin AICP  
City Planner

Attachments:

1. July 8, 2016 Town of Colma letter
2. McDonald's partial windshield survey of lane blockage
3. Draft W-Trans traffic and queuing information

Cc: Town of Colma City Council  
Brian Dossey, City Manager  
Christopher Diaz, City Attorney



July 8, 2016

Mr. Michael VanLonkhuysen  
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. VanLonkhuysen:

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

McDonald's Drive-Through Lane Blockage on Serramonte Boulevard

October 2016-May 2017



Date	Approx. Time
10/25/16	7:55 a.m.
10/28/16	7:55 a.m.
10/31/16	7:55 a.m.
11/8/16	7:55 a.m.
11/9/16	7:55 a.m.
11/15/16	7:55 a.m.
11/29/16	7:55 a.m.
11/30/16	7:55 a.m.
12/2/16	7:55 a.m.
12/13/16	7:55 a.m.

Date	Approx. Time
1/17/17	7:55 a.m.
2/8/17	6:50 p.m.
4/12/17	7:55 a.m.
4/19/17	8:00 a.m.
4/26/17	7:55 a.m.
5/1/17	7:40 a.m.
5/4/17	9:00 a.m.
5/19/17	7:55 a.m.
5/20/17	10:40 a.m.

**Table 3 – Existing Weekday Peak Hour Intersection Levels of Service**

Study Intersection <i>Approach</i>	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
1. Serramonte Blvd/I-280 Southbound Ramps	10.8	B	12.6	B
2. Serramonte Blvd/I-280 Northbound Ramps	1.6	A	3.7	A
3. Serramonte Boulevard/Junipero Serra Blvd	26.1	C	33.6	C
4. Serramonte Blvd/Collins Ave	0.7	A	1.1	A
<i>Northbound Approach</i>	13.7	B	16.8	C
5. Serramonte Blvd/Serra Center Driveway	16.6	C	<b>40.7</b>	<b>E</b>
6. El Camino Real/Serramonte Blvd	26.6	C	35.1	D
7. Serramonte Blvd/Hillside Blvd	27.5	C	28.0	C
8. El Camino Real/Collins Ave	2.7	A	1.7	A
<i>Eastbound Approach</i>	10.3	B	11.3	B
<i>Westbound Approach</i>	12.3	B	11.4	B

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; **Bold** text = deficient operation

**Table 4 – Existing Weekend Peak Hour Intersection Levels of Service**

Study Intersection <i>Approach</i>	Weekend Midday Peak		Weekend PM Peak	
	Delay	LOS	Delay	LOS
1. Serramonte Blvd/I-280 Southbound Ramps	15.7	B	16.0	B
2. Serramonte Blvd/I-280 Northbound Ramps	3.7	A	4.4	A
3. Serramonte Boulevard/Junipero Serra Blvd	41.5	D	40.4	D
4. Serramonte Blvd/Collins Ave	0.8	A	0.6	A
<i>Northbound Approach</i>	17.3	C	15.0	B
5. Serramonte Blvd/Serra Center Driveway	<b>48.9</b>	<b>E</b>	<b>41.4</b>	<b>E</b>
6. El Camino Real/Serramonte Blvd	34.4	C	33.9	C
7. Serramonte Blvd/Hillside Blvd	23.9	C	18.8	B
8. El Camino Real/Collins Ave	1.6	A	1.3	A
<i>Eastbound Approach</i>	10.7	B	10.1	B
<i>Westbound Approach</i>	29.4	D	0.0	A

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; **Bold** text = deficient operation

## Queuing

Under Existing Conditions, the projected maximum queues in left-turn lanes at the study intersections were determined using the SIMTRAFFIC application of Synchro and averaging the 95<sup>th</sup> percentile queues projected queue for each of ten runs. Summarized in Table 5 are the 95<sup>th</sup> percentile left turn queues at the study intersections where left-turn lanes are present, and the queue spillback has the potential to impede the flow of traffic in the adjacent travel lane. Copies of the SIMTRAFFIC projections are contained in Attachment A.

**Table 5 – 95<sup>th</sup> Percentile Left Turn Queues at Study Intersections with Left-Turn Lanes**

Study Intersection Approach	Available Storage	95 <sup>th</sup> Percentile Queues			
		Weekday AM	Weekday PM	Weekend Mid	Weekend PM
2. Serramonte Blvd/I-280 Northbound Ramp Eastbound Left	400	74	195	318	<b>536</b>
3. Serramonte Blvd/Juniper0 Serra Blvd Northbound Left	590	267	389	404	373
Eastbound Left	500	141	326	<b>512</b>	452
Southbound Left	320	108	119	184	209
Westbound Left	145	112	<b>176</b>	<b>173</b>	<b>175</b>
6. El Camino Real/Serramonte Blvd Northbound Left	200	114	<b>240</b>	<b>247</b>	<b>244</b>
Southbound Left	300	139	123	93	101
7. Serramonte Blvd/Hillside Ave Northbound Left	300	236	300	196	157
Southbound Left	75	34	62	37	28
8. El Camino Real/Collins Ave Northbound Left	130	36	36	36	30

Notes: Maximum Queue based on the average of the maximum value from ten SIMTRAFFIC runs; all distances are measured in feet; **Bold** text = queue length exceeds available storage

Left-turn storage is expected to exceed existing storage capacity at three study intersections during at least one peak period. At the Serramonte Boulevard/I-280 Northbound Ramp intersection, the eastbound left-turn queue exceeds the capacity during the weekend p.m. peak period. The westbound left-turn queues at the Serramonte Boulevard/Juniper0 Serra Boulevard intersection extend through the Serramonte Boulevard/Collins Avenue intersection and could impede vehicles attempting to turn left off of Collins Avenue on to Serramonte Boulevard during all peak periods except for during the weekday a.m. peak period. The northbound left-turn queues at the El Camino Real/Serramonte Boulevard intersection exceed the storage capacity during all peak periods except for during the weekday a.m. peak period.

**From:** Betty Shepard  
**To:** [calvin@dalycity.org](mailto:calvin@dalycity.org)  
**Subject:** Fwd: draft environmental impact report  
**Date:** Monday, March 05, 2018 4:17:33 PM

---

---

From: rshepard825@aol.com  
To: pantazyjc@beglobal.net  
Sent: 3/5/2018 4:10:49 PM Pacific Standard Time  
Subject: draft environmental impact report

I would like the link above to review Serramonte Views Condominiums and Hotel Project. I think relocating this

project to the Serra Bowl site would be a great ideal, less traffic and conjection for the St. Francis Height area,

which is already busy. Hopefully the Associate Planner City of Daly City Economic and Community

Development Department will subject this to the developers.

Thank You

st.

## Serramonte Views Condominiums and Hotel Project:

Comments by Cathy Pantazy:

There is little point in addressing, in detail, the Serramonte Views Condominiums and Hotel Project's **DEIR as written** because the conclusion is that there are two "Significant Unavoidable Cumulative Impacts" that prohibit the project, as submitted, from going forward (Freeways and intersection LOS).

However, it is important to address the choice of the "Alternatives to the Project." The city must identify the 'environmentally superior alternative.' And if that is 'No Project,' they then can further identify the environmentally superior alternative among the other alternatives (sort of a second chance to develop something).

It is always important to note that this particular project is located less than a mile from the very active San Andreas Fault. It is also within 8 miles of the San Gregorio Fault and the active Hayward and Calaveras Faults are within 18-24 miles of the site.

In addition, as noted in 2.4.2.2 Soil Impacts, "According to the geotechnical investigation, cemetery service road runoff onto the site has caused considerable erosion historically. Additionally, project excavation and grading will expose soils to wind and rain. Thus, there is potential for soil erosion on the project site."

Alternatives are below:

No Project:

No Development

This is the 'hands-down' best choice for the environment, but it does not generate any income for the city nor provide housing and lodging.

No Project Alternatives:

Current entitlement

I believe that this means that previously the city allowed a developer the right to construct a hotel with 137 rooms and 200 condominiums (337 total at full hotel occupancy), but the buildings were limited to 90 feet in height. The traffic impacting the freeways would be less because of fewer rooms/condos than the

current project that cannot be built (see first sentence), but would still be significant. Again, another argument against this choice is that this option would mean the city would receive less from the transient occupancy tax (hotel) and less tax monies from fewer condominiums. But that would be true of the below as well.

#### Reduced Development:

#### **The city identified this option as the ‘Environmentally Superior Alternative’**

This choice would reduce the number of condominiums to 156 and hotel rooms to 116 (271 total at full hotel occupancy). The impact of this size development would earn a ‘less than significant impact’ rating as far as clogging the freeway on-ramps and “substantial impact reduction” as far as intersections. The hotel and condos would afford additional housing and provide tax monies to the city.

#### Author’s Rebuttal:

There is no indication here of the height or number of buildings that would be built with this ‘reduced development’ option. Would they all be half the size of the initial plan keeping 3 buildings for condos and one hotel? Would they incorporate the condo buildings into two tall ones? How would it look, and would the parking still be built in front with the buildings themselves recessed? Even if it were built with buildings from 6 to 8 stories high (rather than 12-17), these buildings would cast a shadow on Serramonte Blvd. putting it in the shade most of the day. The project’s entrances and exits all flow onto Serramonte Blvd. creating an enormous amount of additional traffic on Serramonte Blvd. and requiring modifications to the boulevard. Lastly, in the event of a strong earthquake, it would have catastrophic consequences for this heavily-traveled boulevard and to the people and their cars driving it. The potential for soil erosion on this project site still remains.

#### Design Alternative:

This choice would have the same number of buildings, but they would have less height: one 11- story and two 9-story residential buildings, all one-bedrooms. The hotel would be 9 stories as well. This alternative would not lessen the traffic impact, or the potential for soil erosion.

## Location Alternative:

The only alternate locations mentioned are the vacated Serra Bowl and the SamTrans Park & Ride lot sites. They are near the Colma Bart station located on Junipero Serra Blvd. and D Street. The land is flat (not the steep, slippery slope on Serramonte Blvd.); it is near Bart and there is more than one way to enter and exit the site. Currently, there is an offer on the property, but it has yet to be accepted. Is this the only site for development near BART?

The General Plan implies it wants to build these large developments near public transportation (would really help the environment), while selecting an ‘environmentally superior alternative.’ And it wants to provide a diversity of housing (low income et al). It also wants to generate income for the city via taxes on these entities. All of these goals would be met by moving the development to an alternate location, and some of the negatives would be avoided.

I support the city’s choice of the “**Reduced Development” option in combination with the “Location Alternative,”** and suggest they build it on flat ground near BART. They can use the Serra Bowl site (if it becomes available and the pending public application is not accepted), or build on another site that is also near BART. It would make it easier to build on a flat surface that does not have the erosion concerns or as many earthquake worries. Since the project is reduced in size, it will not need as much property. Also, there is really no need to build the condos and hotel adjacent to one another. They can be built on separate lots.

Quoting from the DEIR on page xv, it states, “ The Location alternative would meet many of the project objectives since it would construct high-density housing near transit thereby ensuring the project provides minimal disruption to traffic conditions in the area. Due to the gently sloping and developed sites proposed under the Location alternative, grading and tree removal would be minimized on the sites. Additionally, this alternative would provide additional housing types to diversify the housing mix in the City and provide additional residential development to support commercial development.”

“The Location Alternative may reduce the traffic impacts and construction period impacts of the project while meeting the project objectives.”

In conclusion, I favor reducing the size of the development by half, and building it next to public transportation such as BART. Use two sites if necessary, one for the

condominiums and one for the hotel. There is no reason that they need to be built on the same site at the same time or adjacent to each other.

**From:** George Rodriguez  
**To:** [Corey Alvin](#)  
**Subject:** Redevelopment  
**Date:** Sunday, March 11, 2018 7:19:27 PM

---

#### Comments from George and Lynne Rodriguez

We have seen the plans for redevelopment and are wondering why so much so soon. We are already experiencing the crush of cars on the road. The gridlock not only on the road but going shopping etc., will truly be getting worse with all of the redevelopment. The mayors and city councils of most of our cities have given in to the developers, why? They are building without even taking care of the infrastructure to handle the crush of people. Our quality of life is already being destroyed by turning homes into motel 6? What happened to protecting our residential communities? Our streets are jammed with cars and the streets are getting dirtier, dumping etc. Daly City used to be a nice and clean community. The treeless metropolis we see for the future is not what it should be. Not to worry, we have plenty of water.

**From:** Aislinn De Leon  
**To:** [Corey Alvin](#)  
**Subject:** Proposed Development  
**Date:** Monday, March 12, 2018 4:54:18 PM

---

Dear Mr. Alvin,

I'm writing on behalf of myself and my extended family to voice our disagreement with the proposed housing development on Serramonte Blvd across from Serramonte mall.

At this point the traffic around that area is already challenging and I can't imagine what it would be like after adding more housing. The freeway exit for Serramonte is frequently backed up & is dangerous to navigate. Especially so during the holidays. Gellert Blvd is also very congested & we are gravely concerned with adding more traffic to the area.

Please reconsider the development and look at all aspects, traffic flow included, prior to moving forward.

Thanks so much.  
Best,  
Aislinn De Leon

Sent from my iPhone

**From:** Marian Seiki  
**To:** [Corey Alvin](#)  
**Subject:** Serramonte development  
**Date:** Monday, March 12, 2018 8:44:58 AM

---

Good morning

Just wanted to let you know my concerns regarding this outrageous development. The size is ridiculous and the traffic will be a nightmare!!!!

I not sure if you shop at the mall . Traffic ...the congestion is already at full capacity and that is ALL DAY LONG ....so if this complex happens people will be so stressed and full of rage and not even shop at the mall!!!!

Moving it Serra bowl lot is also not a good idea traffic on Junipers Serrated blvd will be another nightmare for the freeway entrance.

If you must build **REDUCE THE SIZES OF OCCUPANCY**

no need for a 17 story or 15 story bldg.

please let me when this goes before the board for discussion would like to attend. How does the Brown Act work...

will you contact me via email or just post it on a board at City Hall???

Marian Seiki

Daly City resident

Sent from my iPhone

**From:** Nadine B. Salamé [<mailto:cnsalame@yahoo.com>]  
**Sent:** Saturday, June 02, 2018 11:15 AM  
**To:** City Clerk <[cityclerk@dalycity.org](mailto:cityclerk@dalycity.org)>; [countyclerk@dalycity.org](mailto:countyclerk@dalycity.org)  
**Cc:** Claude Salame <[claude@sfbaysystems.com](mailto:claude@sfbaysystems.com)>  
**Subject:** Serramonte View Condominium and Hotel Project

To whom it my concern,

I am a Daly City resident on Innisfree Dr, Cypress Point Community. I am emailing you to **STRONGLY object** the building of Serramonte View Condominium and Hotel Project...

The impact this project is going to have on this community is grave... and here is why:

*Aesthetics:* The 21 story building would be the tallest in Daly City and would tower above the area like a sore thumb. The overall complex would be huge and dominate the area. The original zoning for this property was for Buildings not to exceed 90 feet. The proposed project would require Zoning a change to allow building heights up to 255 feet. This is a 165 feet increase in allowable height. This project is a MASSIVE increase in size compared to current zoning proposals.

*Population Density:* Daly City is already the second most densely populated City in California. This proposal would bring in families to fill the 323 units plus employees and guests for a 176 room hotel. All of this in a very narrow piece of land, cut far into a very steep hillside. This project requires a Zoning change to Very High Density, or more than 50 dwellings per acre.

*Traffic:* The recent development within the Serramonte Mall Complex has greatly increased the traffic in the area. Can you imagine what the traffic will be like when you add the traffic for 176 hotel rooms and the cars from the families occupying 323 housing units. Parking: For 323 Condominium Units, the project has only designed 420 parking spaces. This is only 1.3 parking spots per unit on average. Drive around the Daly City area and you will notice few homes with only 1 car. Most housing units within the city probably average 2-4 cars per household. Where are the extra cars these residents are going to have going to park? I'll tell you where, in the surrounding neighborhoods which are already struggling to provide adequate parking for their residents.

Last but not least... *Environmental:* **Even the Cities own Environmental Impact Study states:** "...the No Project Alternative is an environmentally superior alternative to the proposed project". "No Project Alternative would also allow for the development of the site under the existing General Plan land use designations. Currently the PD-57 zoning district allows the construction on a 137-room hotel and 200 condominium units with building heights up to 90 feet.

Please vote no!!

Respectfully,

Nadine Baroudi Salame

**ERRATA**  
**Final Environmental Impact Report**  
**Serramonte Views Condominiums and Hotel Project**  
**SCH No. 2016062063**

**File Nos.** GPA-9-14-9640, PD-9-14-9637, SUB-9-14-9643, Design Review-9-14-9644, UPR-1-18-013248

**Location** 525 to 595 Serramonte Boulevard, Daly City

The Final Environmental Impact Report for the Serramonte Views Condominiums and Hotel Project is revised to include the following errata to correct and address an additional comment letter that was previously omitted from the document. Deletions are shown as ~~striketrough~~ text and additions are shown in underlined text.

Page 6 Section 2.0 List of Comment Letters Received on the Draft EIR; **INSERT** the following comment letter to the list of Organizations and Individuals:

J. Lacey Bastian January 30, 2018 27

Page 27 Section 3.0 Responses to Comments Received on the Draft EIR; **INSERT** the text below following Response I-5:

**J. RESPONSE TO COMMENTS FROM LACEY BASTIAN, JANUARY 30, 2018:**

**COMMENT J-1:** Way too many units being allowed for the area. How can the condominiums being proposed not even have a clear floor plan?

**RESPONSE J-1:** The comment regarding the size of the project is acknowledged. Full plan sets for the project including detailed floor plans are on file with the City's Planning Division. Representative floor plans for the project were provided in the Draft EIR.

**COMMENT J-2:** Difference between 13 and 17 stories is huge! It will be an eyesore. Should either let a hotel OR condos go in, and limit height of buildings.

**RESPONSE J-2:** The comments regarding the building heights and aesthetics are addressed in Response I-1. The comment regarding the proposed uses is acknowledged and does not raise any specific concern regarding the adequacy of the EIR.

**COMMENT J-3: TRAFFIC**

**Traffic is the main problem with this project. Residents and visitors in the surrounding areas will be hugely affected by the number of cars that come into the**

area because of this project. There are many intersections where there are only stop signs and not signals, and several areas that are not able to handle the influx of people this will cause.

**RESPONSE J-3:** The traffic impacts of the project were analyzed in the Traffic Impact Analysis and identified in the Draft EIR. As stated in the Draft EIR, MM TRANS-1.1 requires installation of a signal to address increased delays at the SR 1 Northbound Ramps and Serramonte Boulevard. The project would also result in a significant and unavoidable impact to the I-280 southbound weaving segment between SR 1 and Serramonte Boulevard as discussed in the Draft EIR. The proposed project would not result in any other significant impacts to intersections or freeway segments.

**COMMENT J-4:** Additionally, it will be harder to drive or walk safely, park, and visit the area, negatively impacting the surrounding house prices.

**RESPONSE J-4:** The project will improve pedestrian circulation and safety by adding a sidewalk along the street frontage on the south side of Serramonte Boulevard, and adding a crosswalk between the project driveway and Serramonte Shopping Center. The commenter's opinion regarding the economic effects of the project are acknowledged. The Draft EIR analyzes the environmental impacts of the project as CEQA does not require analysis of the economic effects of a project.