CITY OF DALY CITY

Regular Meeting - PLANNING COMMISSION

AGENDA

Tuesday, December 5, 2023 - 7:00 PM
City Hall Council Chambers – 2nd Floor
City Hall 333 – 90th Street
Daly City, CA 94015

Public Participation:

There are three ways to submit public comments: (1) email your comment directly to the Planning Division, (2) submit written comments via the City's website and (3) attend the meeting in person.

1. To email your comment, simply email a comment to the planner identified in the public hearing notice or send the email to mvanlonkhuysen@dalycity.org. Public Comments may also be emailed to mvanlonkhuysen@dalycity.org by including "Planning Commission Public Comment" in the subject line.
2. To submit a comment via the City's website, please visit www.dalycity.org/agendas to complete the Public Comment form. In the comment field box, include the item number and/or title of the item as well as your comments.
3. To speak at the meeting in person, please complete a "Speaker Card" located at the entrance to the Council Chambers and submit it to a staff member as early in the meeting as possible.

Please note: All written comments received by 4:00 pm on the meeting day will be provided to the Planning Commission prior to the meeting. Comments are not read aloud into the record. Any written comments received after 4:00 p.m. on the meeting date are not guaranteed to be received by the Planning Commission prior to the meeting.

Persons with disabilities who require auxiliary aids or services in attending or participating in this meeting should call the office of Michael Van Lonkhuysen at 991-8158 as soon as possible.

OPENING OF MEETING:

PLEDGE TO THE FLAG:

ROLL CALL:

APPROVAL OF MINUTES:

1. Approval of November 7, 2023 Planning Commission Meeting Minutes

AVAILABILITY OF PUBLIC RECORDS:

All public record to an open session item on this agenda, which are not exempt from disclosure pursuant to the California Public Records Act, that are distributed to a majority of the legislative body will be available for public inspection at the City Clerk's Office, City Hall located at 333 90th Street, Daly City, CA during normal business hours, at the same time that the public records are distributed or made available to the legislative body.

STAFF:

RECOMMENDATION:

PUBLIC HEARINGS:

2.

1. **General Plan Amendment GPA-04-21-014998, Planned Development PD-04-21-014997, Major Subdivision SUB-04-21-014999, and Design Review DR-04-21-015000**. The applicant, Jefferson Union High School District (JUHSD), proposes amend the Daly City General Plan and existing Planned Development PD-31 for the site to allow a Precise Plan approval that would allow the redevelopment of the 22-acre Serramonte Del Rey Campus to include up to 1,235 units of affordable and market-rate rental housing, up to 14,000 square feet of neighborhood-serving retail/commercial uses, and square footage allotted for a Head Start childcare facility. The project also includes a request for design review approval for a proposed six-story, 210-unit mixed-use building with approximately 345 parking spaces and approximately 8,000 square feet of retail space, a park, play structure, and various resident amenities on proposed Parcel B. The proposal would create a new Planned Development for the site, amend the General Plan designation to Commercial-Mixed Use (C-MU), and allow for a subdivision of land necessary to implement the project. The Planning Commission will also consider whether the proposed Development Agreement for the site is consistent with the City's General Plan. In accordance with the California Environmental Quality Act (CEQA), the City has prepared a Final Environmental Impact Report (FEIR) to assess the potential environmental consequences of implementing the proposed Precise Plan. This document can be viewed at www.dalycity.org/feir. APN 091-211-230.

STAFF: Michael VanLonkhuysen

RECOMMENDATION:

PUBLIC APPEARANCES, STAFF COMMUNICATIONS:

ACQUISITIONS, VACATIONS, ETC. - SECTION 65402(A)

ADJOURNMENT:

CITY OF DALY CITY
PLANNING COMMISSION
MEETING
Draft
MINUTES

Tuesday, November 7, 2023 – 7:00 PM

http://bit.ly/dalycitynov7

OPENING OF MEETING:

PLEDGE TO THE FLAG:

ROLL CALL:

PRESENT: T. Faapuaa, R. Paniza, T. Proaño, R. Satorre

APPROVAL OF MINUTES: Of June 6, 2023, Planning Commission Meeting

PUBLIC HEARING:

1. **General Plan Amendment GPA-10-23-16407 and Zone Change ZC-10-23-16496.** The City of Daly City propose an amendment to the Daly City General Plan, Zoning Ordinance, and the Bay Area Rapid Transit (BART) Station Area Specific Plan) so that the parcels that make up the Mission Street and Geneva Avenue corridors will have the same General Plan and Specific Plan land use designation and zoning district. The proposed project also establishes Commercial Mixed-Use (C-MU) Objective Design Standards to provide key, objective requirements for a clear and straight forward application and approval process for future multifamily housing and mixed-use construction within the C-MU zoning district. Pursuant to CEQA Guidelines Section 15164, the City has prepared an addendum to 2013 General Plan Environmental Impact Report. For a full list of APNs, visit **www.dalycity.org/cmu.**

   Staff report presented by: Michael Van Lonkhuysen, Planning Division Manager

   On November 7, 2023, the Planning Commission voted unanimously (4-0) to recommend the City Council approve the proposed changes to the Zoning Ordinance, General Plan, and BART Station Area Specific Plan.

Moved by Commissioner Paniza, seconded by Commissioner Faapuaa to close the public hearing. Motion carried 4-0.

Moved by Commissioner Faapuaa, seconded by Commissioner Paniza to adopt the findings as outlined in the staff report of November 7, 2023. Motion carried 4-0

Moved by Commissioner Paniza, seconded by Commissioner Faapuaa to recommend that the City Council accept the General Plan EIR addendum. Motion carried 4-0 (unanimous roll call vote).

Moved by Commissioner Paniza, seconded by Commissioner Faapuaa to recommend approval of the General Plan Amendment GPA-10-23-16407 AND Zone Change ZC-10-23-16496 subject to the Findings outlined in the staff report of November 7, 2023. Motion carried 4-0 (unanimous roll call vote).

PUBLIC APPEARANCES, STAFF COMMUNICATIONS:

ACQUISITIONS, VACATIONS, ETC. - SECTION 65402(A):

ADJOURNMENT: Moved by Commissioner Satorre, seconded by Commissioner Paniza to adjourn the meeting at 7:55 p.m.

For further information regarding the above projects or to obtain staff report for any of the above projects, please contact Michael VanLonkhuysen at mvanlonkhuysen@dalycity.org. Persons with disabilities who require auxiliary aids or services in attending or participating in this meeting should notify the Office of the City Clerk at 991-8078 as early as possible.

Availability of Public Records: All public records relating to an open session item on this agenda, which are not exempt from disclosure pursuant to the California Public Records Act, that are distributed to a majority of the legislative body will be available for public inspection at the City Clerk's Office, City Hall located at 333 90th Street, Daly City, CA during normal business hours, at the same time that the public records are distributed or made available to the legislative body.

Draft

Daly City Planning Commission
Agenda Report

333 - 90th Street ◆Daly City ◆ California ◆ 94015 ◆ 650-991-8033

Meeting Date:	December 5, 2023
Application:	General Plan Amendment GPA-04-21-14998, Planned Development PD-04-21-14997, Major Subdivision SUB-04-21-14999, and Design Review DR-04-21-15000
Project Planner:	Michael Van Lonkhuysen, Planning Manager
Project Location:	699 Serramonte Boulevard (APN 091-211-230)
Project Description:	Precise Plan (final) review of proposal to redevelop the Serramonte Del Rey Campus to a new commercial-mixed use neighborhood
Applicant/Property Owner:	Jefferson Union High School District 699 Serramonte Boulevard Daly City, CA 94015
Environmental Assessment:	Environmental Impact Report
Applicable Daly City Municipal Code Sections:	Chapter 17.28 – PD Planned Development District Chapter 17.45 – Design Review Title 16 – Subdivisions

Site Information

Property Sizes	Existing Use	Proposed Use	General Plan Designation	Current Zoning
22-acre project site	School building (closed) currently used for JUHSD administrative offices and other uses	Commercial mixed-use	Residential – High Density (northwest corner of site), Commercial – Office (remainder of site)	Planned Development PD-31A (northwest corner of site), Planned Development PD-31 (remainder of site)

Area Information

Land Use	Zoning
North: Residential	R-3 Multiple-Family Residential
South: Residential, School	Planned Development PD-31
West: Residential	R-1 Single-Family Residential
East: Gas Station, Cemetery	Planned Development PD-2, Cemetery

Background

The Serramonte Del Rey Precise Plan (PD-31) was approved for the Serramonte Del Rey Campus in 1985 (see Attachment A – Location Map) and allowed up to 175 residential units and approximately 700,000 square feet of office space within the campus area. An amendment to the Precise Plan (PD-31A) was approved in January 2020 for the northwest section of the site to allow for the construction of a Jefferson Union High School District (JUHSD) faculty and staff housing project which was completed in 2022.

The project site is bounded by Serramonte Boulevard to the north, Callan Boulevard to the east, existing residential development to the west, and multi-family residential development, a school, and medical office to the south (Phase I of the 1985 Serramonte Del Rey Precise Plan). The project site currently consists of a main building occupied by JUHSD offices and non-profit organizations, temporary buildings, surface parking, and JUHSD faculty and staff housing. There is also a school garden located in the southwest corner of the project site. This garden has been used by JUHSD for adult education as a demonstration garden.

The applicant and property owner, JUHSD, has submitted an application that proposes a new Precise Plan for the campus (see Attachment B – Draft Precise Plan). The proposed Precise Plan would allow for the redevelopment of the campus to include up to 1,235 units (122 existing) of affordable and market-rate rental housing, up to 14,000 sq. ft. of neighborhood-serving retail/commercial uses, and a Head Start childcare facility. The site would be divided into six development parcels and additional street parcels with public access easements (see parcel plan below). Build-out of the site is anticipated to be over a ten-year period.

After considerable public input, the Planning Commission voted unanimously (5-0 vote) to recommend that the City Council approve the Preliminary Plan on August 3, 2021. Also, after considerable public input and gaining input from meetings of the Affordable Housing Committee and joint meetings between the Affordable Housing Committee and members of the Jefferson Union High School District (JUHSD) Board, the City Council granted Preliminary Plan approval (4-1 vote) for the project on January 10, 2022, allowing the project to proceed to the Precise Plan stage.

Since this time, the applicant and staff have worked to draft a Development Agreement that provides guarantees to both the City and the applicant about the timing of off-site improvements, provision of affordable housing, and similar topics. Although the Development Agreement does not require the Planning Commission's approval, it is required that the Planning Commission forward a recommendation to the City Council as to whether the agreement is consistent the

General Plan (see Attachment C - Serramonte Del Rey Draft Development Agreement Summary and Attachment D – Draft Development Agreement). The attached summary was shared with a Council Committee in October 2023 and the Committee took no issue with the overall terms the applicant and staff have agreed to submit for full City Council consideration. Staff has evaluated the Draft Development Agreement, has determined that it is consistent with the General Plan, and is recommending the Planning Commission also find it consistent.

The project, as proposed, requires the following entitlements:

1. General Plan Amendment to change the General Plan designation from Residential – High Density (R-HD) and Commercial – Office (C-O) to Commercial – Mixed Use (C-MU);

2. Rezone project site from Planned Development 31 (PD-31) and Planned Development 31A (PD-31A) to a new Planned Development;

3. Design Review for the site and building design for the proposed development and site improvements on Parcel B;

4. Major subdivision to subdivide the project site into six development parcels and additional street parcels with public access easements;

5. Certification of the Environmental Impact Report for the project; and

6. Development agreement (P.C. recommendation of General Plan conformance required).

The Planning Commission should be aware that the application includes a request for Design Review approval of a 210-unit mixed-use building with approximately 6,000 square feet of retail space that would be located on Parcel B. This building's design qualities are discussed in the Design Review section of this staff report. Because the project is included in the City's Draft Housing Element, it is necessary that approvals of subsequent buildings happen administratively - without additional public hearings. For this reason, the applicant and staff have worked together to develop Objective Design Standards that provide for a streamlined review process that would allow the buildings approved in the Precise Plan to proceed to building permit stage. These Objective Design Standards are contained proposed Precise Plan and reference and incorporated into the Planned Development zoning regulations that would be applicable to the site.

Precise Plan Discussion

As stated in the proposed Precise Plan, the vision for the project is to transform the project site into a new walkable, bikeable, and family-friendly residential neighborhood. JUHSD anticipates attracting investment by the development community through use of long-term ground leases and/or joint venture agreements to develop the neighborhood on a parcel-by-parcel basis. The District's stated intentions for doing so are to provide a much-needed revenue source that will assist chiefly with faculty and staff attraction and retention in a highly competitive job market. The District's achievement in building the 122-unit faculty and staff housing project at the northwest corner of the site has assisted in this effort and the District has made a considerable

investment in the development application before the Planning Commission to leverage its remaining assets in manner that benefits the educational needs of the City's public high schools.

To this end, the Precise Plan establishes an urban design plan for the 22-acre site, including details about development capacity, vehicular and pedestrian circulation, parks and open space, infrastructural needs, and implementation (phasing). The Objective Development Standards are also a large component of the Precise Plan and provide significant details about urban design, architectural, and landscape design concepts, including building height and massing, all of which must be satisfied in any building permit application. The Precise Plan was developed with significant input by Planning, Public Works, and North County Fire Authority staff and its sections are summarized as follows:

Objective Development Standards (pages 15-58). The Objectives Design Standards provide a regulatory framework for land use and urban design, architectural design, parking and loading, landscape design, and lighting. As discussed previously, because implementation of the Precise Plan must occur administratively, i.e., without subjective evaluations from the Planning Commission and City Council, it is necessary to have a detailed and comprehensive design framework against which specific construction proposals may be evaluated by the Planning Division staff. The Planning Commissioners are encouraged to review the concepts contained with the Objectives Design Standards and ask questions at the Planning Commission meeting if there is anything that is unclear or if there are topics not addressed within these regulations that the Commission feels should be addressed.

One of the primary components of the Objective Design Standards is establishing the parcel lines that are currently contemplated and the development intensity that can be expected on each of the resulting six parcels, which are lettered in a clockwise direction on the site "A" through "F," with the existing 122-unit faculty and staff housing project situated at the northwest corner of the Precise Plan area as Parcel "A." The images below and on the next page depict the proposed parcel configuration and development intensity.

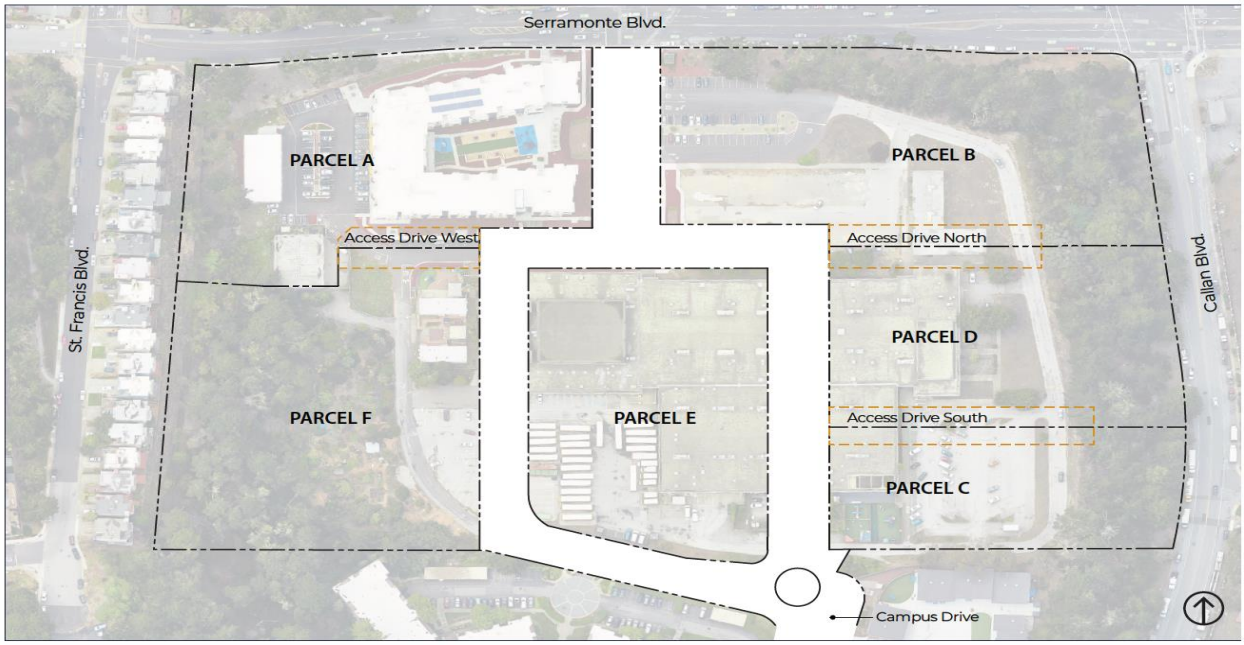


Table 3.2 - Anticipated Development

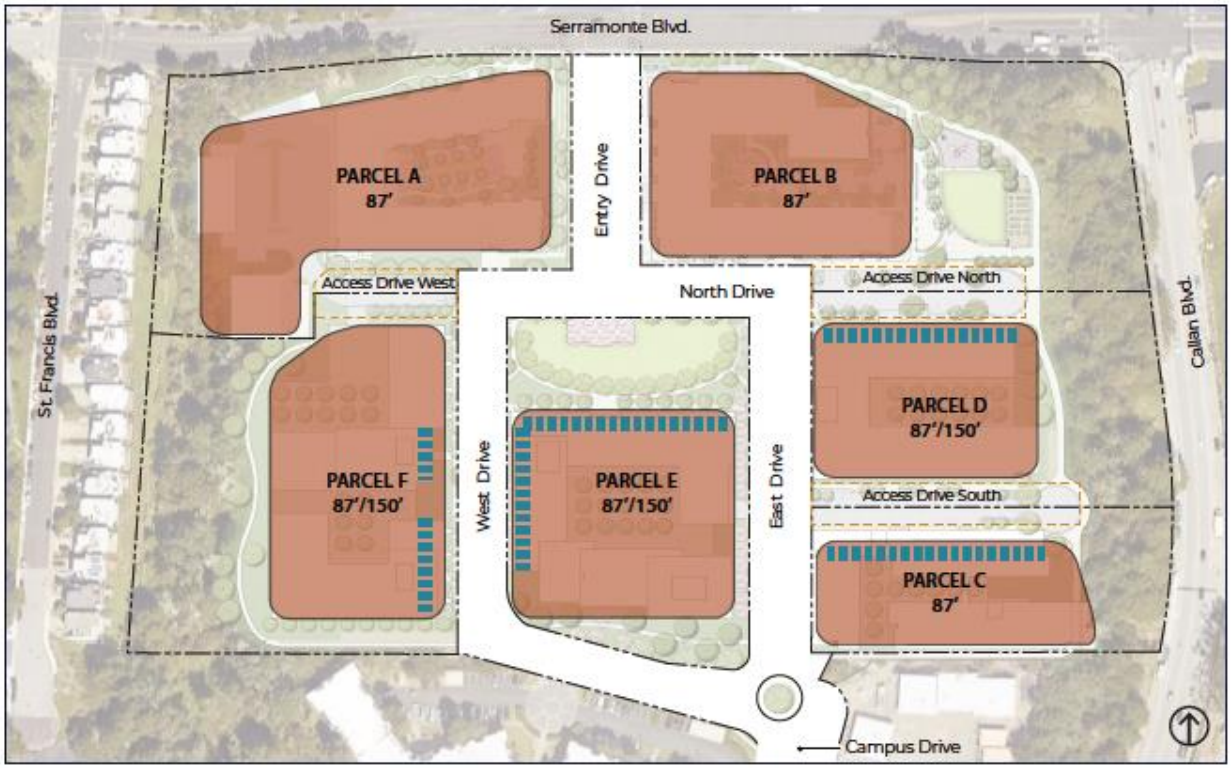
Parcels	Area (Acres)	Housing Units	Density	Retail / Commercial	Other
Parcel B	4.26	201	47 DU/Acre	6,000 sq.ft.	
Parcel C	1.93	152	79 DU/Acre	**	2,800 sq.ft. (relocated Head Start facility)
Parcel D	2.83	188*	66 DU/Acre	**	
Parcel E	2.99	290*	97 DU/Acre	**	
Parcel F	3.99	282*	71 DU/Acre	**	
Total New Development	**15.87**	**1,113**	**70 DU/Acre**	**14,000 sq. ft.**	
Parcel A (existing, not counted as new development)	3.68	122	33 DU/Acre		1000 sq.ft. (existing Comcast facility)
Street Parcels within Plan Area***	2.48				
Total Development	**22.16**	**1,235**		**14,000 sq.ft.**	**3,800 sq.ft.**

(*) Denotes parcels with high-rise building potential (up to 14 stories). Only two of these three parcels may be developed with high-rise buildings. This table includes an assumption that Parcel D and Parcel F will be developed with high-rise residential buildings, but during implementation the high-rise location may be transferred to Parcel E from either Parcel D or F. In any case the overall buildout of the Plan Area is limited to 1,235 residential units.

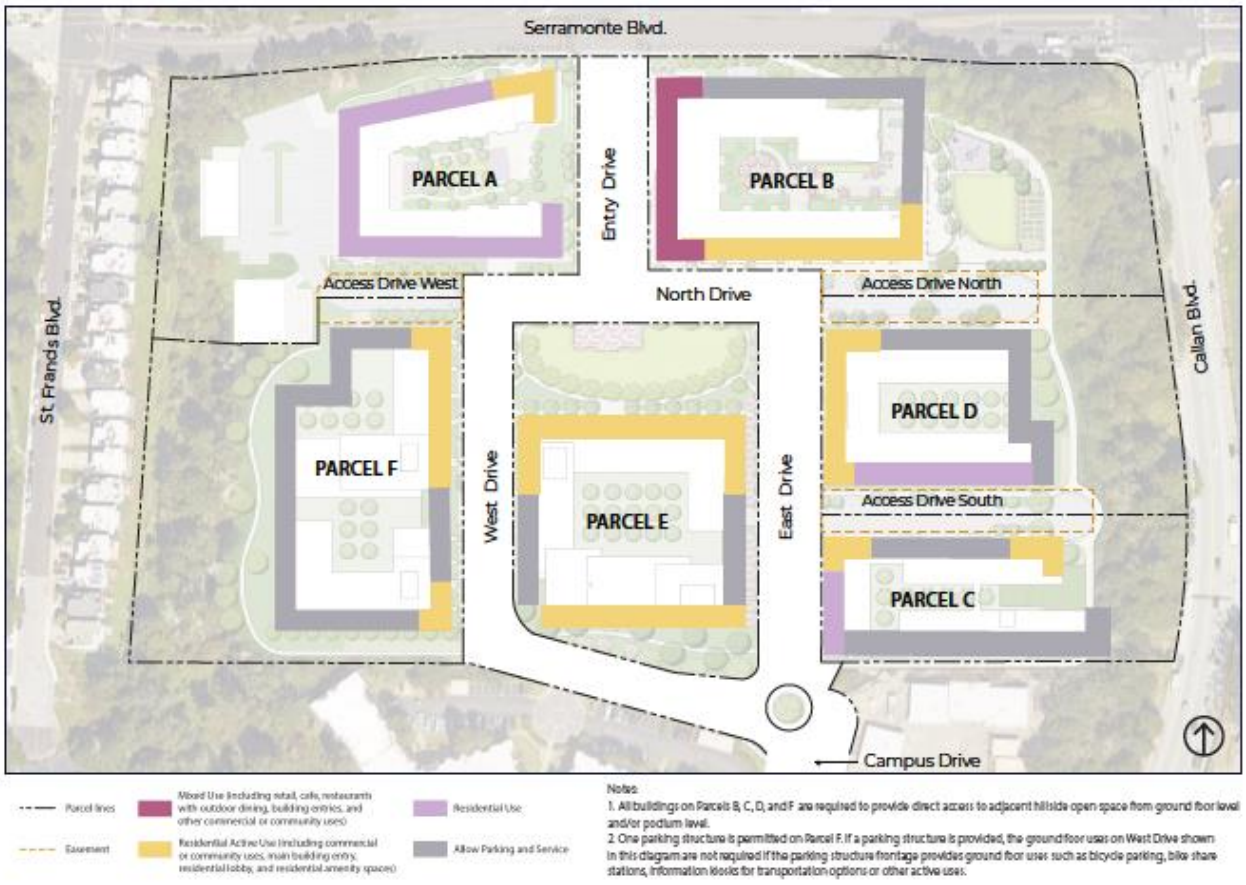
(**) Denotes parcels that may provide retail/commercial square footage on the ground floor in addition to 8,000 sq.ft. assumed for Parcel B. Each of these parcels may or may not build commercial square footage on the ground floor; in any case the total retail/commercial square footage for the overall buildout of the Plan Area is limited to 14,000 sq.ft.

(***) Does not include the 2.59 acres of "Lot 3" on the Tentative Map, comprised of West Drive south of Parcel E, the roundabout and Campus Drive south to Hickey Boulevard.

Perhaps the most significant regulations contained in the standards relates to permissible building height, which is identified in the image below. While the height limits for Parcels B and C would be contained in an 87-foot podium, the permitted building height limits for Parcels D, E and F could extent to 150 feet for tower, which are subject to a dimensional maximum above the podium.



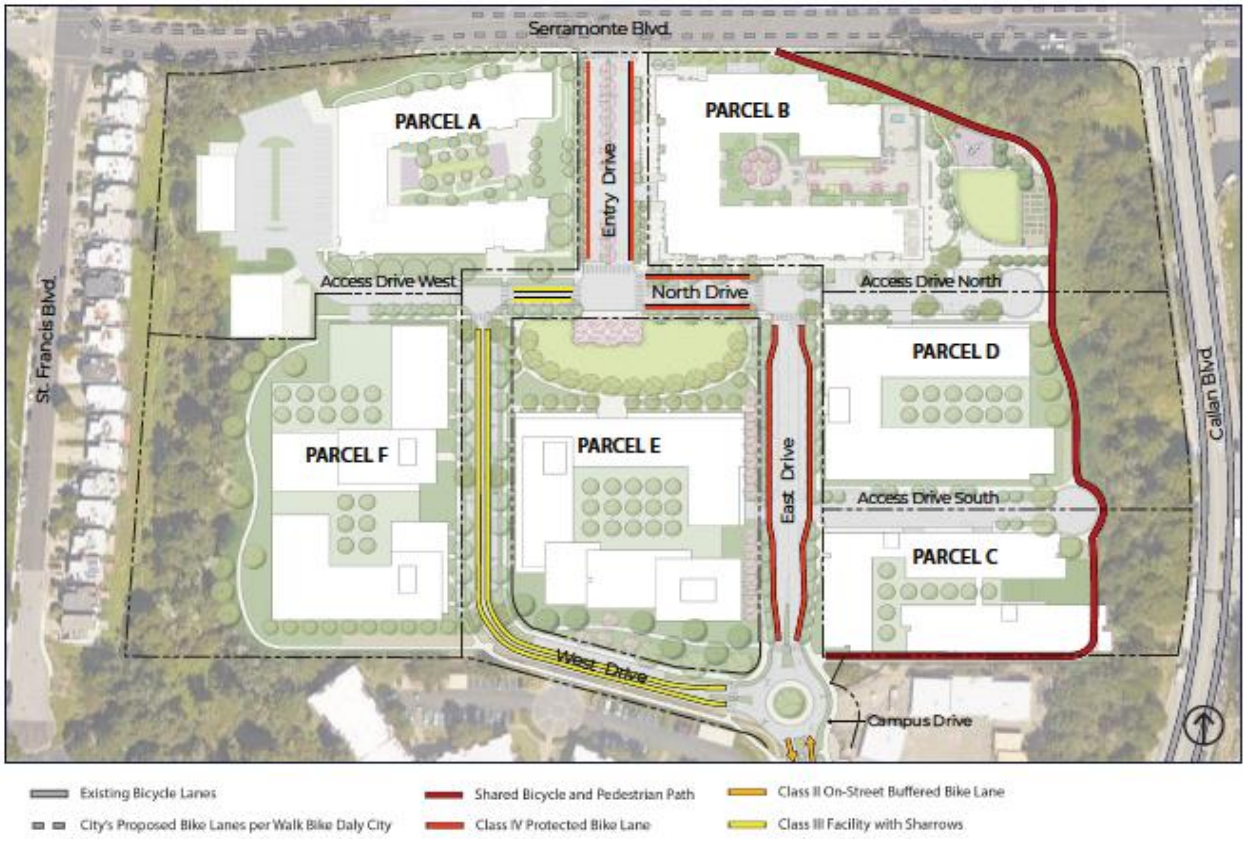
To provide some context for these allowances, the proposed Parcel B building is a six-story building and 73 feet in height from finished grade to the top of the parapet. Assuming similar plate heights in new buildings on Parcels D , E, and F, building heights as tall as 12 stories could be expected. It is for this reason that staff and the applicant have worked on including strong regulatory concepts within the Precise Plan for architectural character, massing, and façade composition. The Objective Design Standards, for example, require that specific percentages of a building's frontage be constructed to a "build to" line, as identified in the image below, to ensure that future buildings are not overly set back from the street and provide a lively interface with the adjacent street and sidewalk. Figures 3.4 and 3.6 (below) in the Precise Plan provide a graphic example of how these regulations would mandate an activated street frontage for new buildings.



While all the urban design and architectural concepts included in the Precise Plan are too numerous to discuss in this staff report, the Planning Commissioners are encouraged to review the Objective Design Standards and raise issues or ask questions at the Planning Commission meeting.

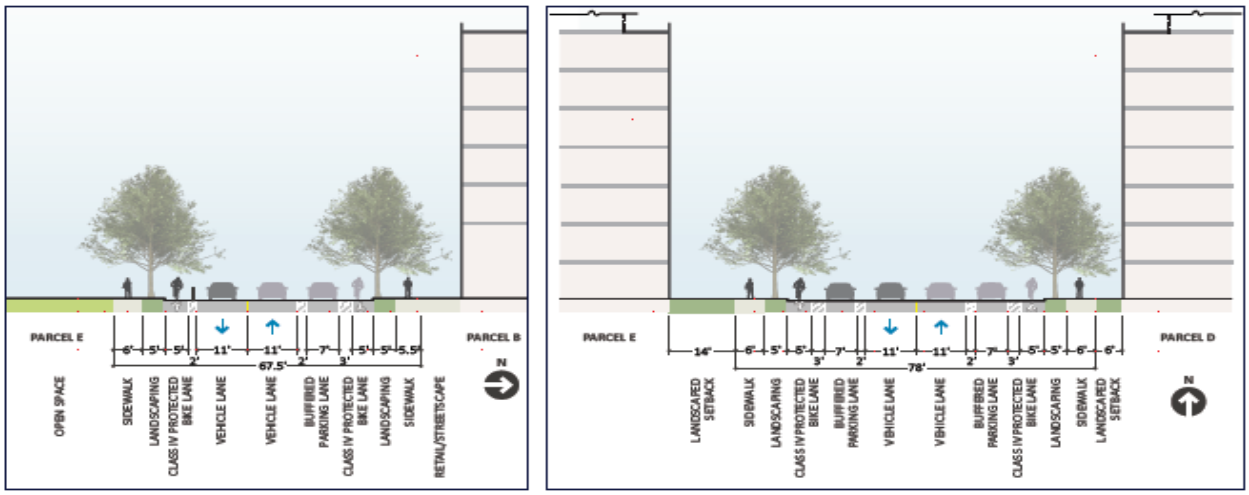
Circulation (pages 59-84). The Circulation component communicates the roadway and pedestrian network the staff and applicant have agreed to for the Precise Plan area, all of which will be private and maintained by a Master Association established and maintained by JUHSD. The establishment for the Master Association is specified in the Planned Development regulations and would be required prior to any construction.

As represented in figures below, the circulation system in the Precise Plan would essentially be a looped system of traffic calmed low-speed roadways, connected to Serramonte Boulevard to the north and Hickey Boulevard to the south. This section communicates the roadway lane configurations that have been agreed to by the Public Works Department.



Entry Drive has been conceived as the Precise Plan area's "main street," the design of which is characterized by adjacent retail uses to its east (contemplated in the future Parcel B first floor) and a linear pedestrian plaza extending from Serramonte Boulevard to the Central Green, north of Parcel E. The street section on the next page shows the agreed-to lane configuration for Entry Drive, which is comprised of two 11-foot travel lanes, two 10-foot continuous through/turn lanes, five-foot protected bike lanes with a two-foot buffer, and a six-foot landscape median. Sidewalks would be constructed on both sides of the street, with a six-foot-wide sidewalk on the west side separated from the street by a five-foot planting strip. On the east side, a wide sidewalk would be installed that would be comprised of three zones: a planting and street furniture zone, a through-zone for pedestrians, and a frontage zone for active ground floor uses to extend onto the sidewalk.

The Precise Plan includes several pedestrian facilities that would allow residents to walk and bike through the site and access on-site recreation and retail amenities. Sidewalks are provided on every street within the Plan Area, with curbside planting strips for street trees and storm water filtration. A trail loop separated from vehicles would also provide pedestrian access around the site in a more natural setting. Sidewalk and trails have been designed to provide residents the ability walk between the Plan Area's parks, open spaces, residences, and retail shops.



North Drive and East Drive - Local Connector Streets

North Drive and East Drive are connector streets as a through route from Entry Drive to Campus Drive for vehicles and cyclists to travel from Serramonte Boulevard and Highway 1 ramps intersection to Campus Drive and Hickey Boulevard intersection. The street sections, as shown in Figures 4.3 and 4.4, are comprised of:

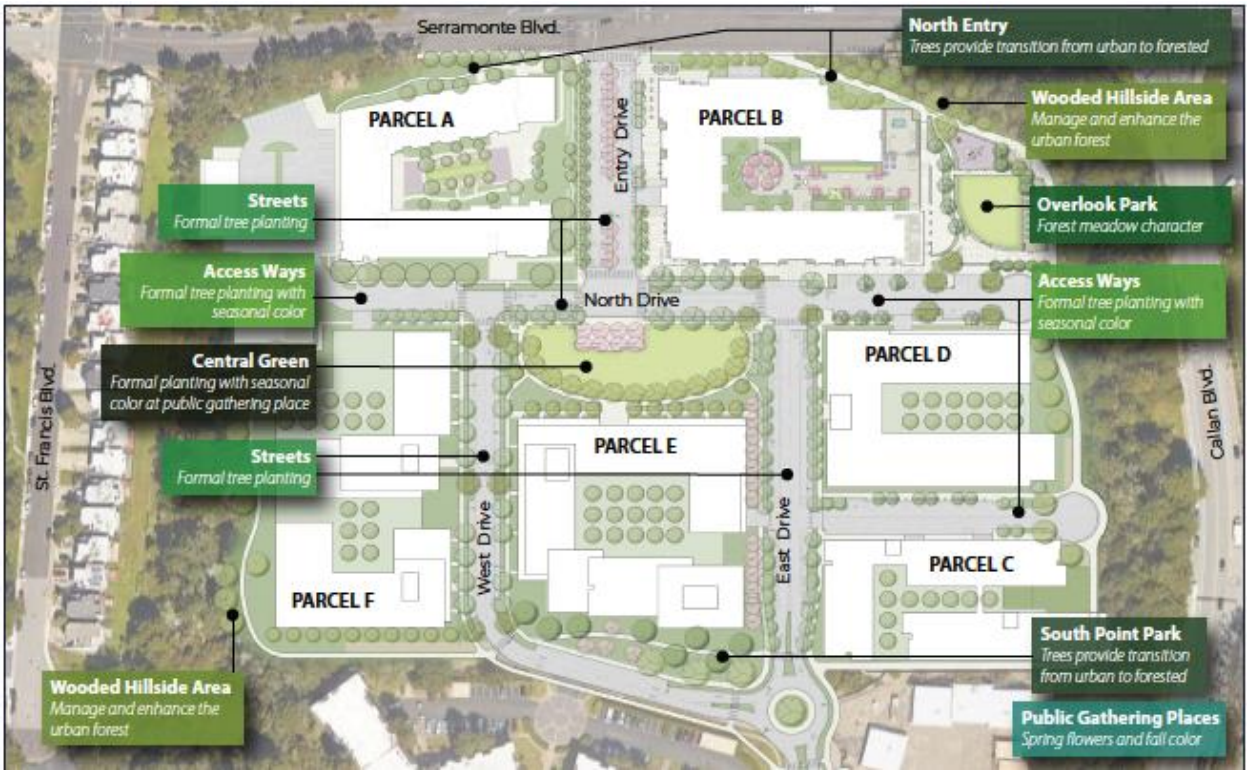
- Five-foot Class IV protected bike lanes in both directions and two 11-foot travel lanes with buffered on-street parking.
- Five-foot tree-lined planting strips with six-foot sidewalks on both sides of the street
- Existing Campus Drive is to be improved with Class II bike lanes on both sides of the street from East Drive to Hickey Boulevard.

In addition to Entry Drive, cross sections of all roads in the Precise Plan area are represented graphically in the Precise Plan *Circulation* section. Like Entry Drive, these sections have been accepted by the Public Works and Fire Department. As will be discussed subsequently, roadways like all improvements will be phased over several years and the applicant and staff have worked to ensure that the proposed plan is realistic and can be implemented in a way that meets both the City and District's objectives.

Parks and Open Space (pages 69-78). As shown in the figure on the subsequent page, the Precise Plan proposes the provision and configuration of common open space for the Precise Plan area essential in five spaces:

1. Central Green (the plan area's focal park) – Parcel E
2. Overlook Park (includes community garden accessible to all Daly City residents) – Parcel B
3. South Point Park - Parcel E
4. Eastside Recreational Trail – Parcel F
5. Westside Walking Trail – Parcels B, C, and D

Each of these open spaces area would be built at the same time as their respective parcel and all would count, in combination with private open space, toward the Planned Development zoning requirement of 150 square feet of open space per unit. Additionally, all these areas would be accessible to all residents of Daly City though the recordation of public access easements.



Because not all parcels contain significant amounts these common open space areas, i.e., Parcels D, C, and F, the Planned Development zoning has been written so to allow the allocation of open space on any given parcel to be provided on another Precise Plan parcel, provided previously developed parcels have a surplus of the 150 square foot requirement.

Utilities (pages 79-84)). This section provides an overview of the public infrastructure that would be necessary to implement the Precise Plan. As indicated in the Conditions of Approval, the applicant has completed water and sewer analyses, and would be required to install all the improvements mandated by these studies.

Implementation (pages 85-100). As contemplated, the project is anticipated to be built out in three phases:

1. The first phase would maintain the existing JUHSD building and demolish the surface parking lot located between the existing school building and Serramonte Boulevard. The proposed mixed-use development on Parcel B would be constructed as well as Entry Drive, North Drive, and Overlook Park. North Access Way as needed for access to Overlook Park.

2. The second phase would include demolition of the existing JUHSD building and the remaining surface parking lots and access roads within the project site. All outbuildings will be either relocated or demolished and housing on Parcels C and D would be constructed. A new Head Start facility would also be constructed on Parcel C. The improvements would include construction of East Drive and any necessary utilities.

3. The third phase would include the build out of Parcels E and F, Central Green, and the open green space at the entry to the site from the south of the Precise Plan area.

To allow for a variety of phasing scenarios, the applicant has worked with the Public Works and Fire Departments to the ensure that buildout of the project occurs in an orderly manner, as identified in the footnotes of the following figure and its footnotes.

Table 7.1 Phasing of Parcels and Plan Elements

Phase	Parcels	Streets	Parks and Open Space
1	B Including retail*	▪ Entry Drive ▪ North Drive ▪ North side of North Access Way**	Entry Drive Plaza, Overlook Park, Eastside Recreation Trail within parcel
2	C Including Head Start***	▪ If Parcel C before Parcel D: East Drive from Campus Drive to South Access Way ▪ South Access Way	Eastside Recreation Trail within parcel
	D*	▪ East Drive from North Access way to South Access way ▪ South side of North Access Way	Eastside Recreation Trail within parcel
3	E	▪ West Drive from North Drive to Campus Drive (whichever parcel is built first)	Central Green & South Point Park
	F	▪ West Drive from North Drive to Campus Drive (whichever parcel is built first)	Westside Walking Trail

* Callan Boulevard frontage improvements within parcel.

** North side of North Access Way includes a two-way travel way up to eastern end of on street parking on north side of street and pavement to access way along eastside of Parcel D, until the time that Parcel D is built..

*** The Head Start facility may be located on other parcels.

Notes:

1. If Parcel E is built before Parcels C and D, then East Drive and North Drive will be constructed including the roundabout.
2. If Parcel F is built before Parcels C. D and E, then West Drive and the roundabout will be constructed.
3. Serramonte Boulevard and Highway 1 ramp intersection improvements will be constructed with the first market rate development per the Development Agreement.
4. Bike lanes on Campus Drive to Hickey Blvd will be constructed concurrent with the roundabout.
5. See Development Agreement for timing of additional off-site improvements.
6. A Storm Drain Memo shall be submitted for conformance review for each phase in accordance with the Master Plan Drainage Memo. At Building Permit submittal: a Hydrology & Hydraulics report based on final design will be provided with the Building Permit submittal in accordance with the Master Plan Drainage Memo.

In addition to Precise Plan phasing information, the *Implementation* section outlines the process for "Conformance Review," which is essentially the Precise Plan's ministerial, streamlined process for staff approval of new buildings in each of the Precise Plan's phases. As indicated previously, these approvals would essentially ensure that the proposed phase has demonstrated consistency with the Precise Plan and Objective Development Standards described in this section. As is the case with almost all development – and especially a project this size – changes are inevitable and the Precise Plan provides for administrative relief from the numerical standards contained within it, up to 20 percent. Deviations from the minimum and maximum densities prescribed in the Precise Plan, the required amount of private open space (150 square feet per dwelling unit), and the quantity and general location of common open space shall not be permitted, as are modifications to the Precise Plan pattern of streets and blocks, shape of open space areas, site layout, orientation or location of buildings.

Design Review (Building B)

The application includes a request for Design Review approval of Parcel B, a 210-unit mixed-use building with approximately 6,000 square feet of retail immediately east of the existing facility and staff housing development, adjacent to Serramonte Boulevard (see Attachment E – Design Review Submittal for Parcel B). The application for Design Review contemplated that this building would be constructed first, although that may no longer be the case.

The proposed building is six-stories of apartments over a parking podium and retail that would be 73 feet tall. The building would provide 21 studio units, 75 one-bedroom units, 86 two-bedroom units, and 28 three-bedroom units. Although the City is precluded from regulating parking in the Precise Plan pursuant to Assembly Bill AB 2097, the applicant has proposed 334 parking spaces, 301 for residents and 33 for the public, within the lower and ground levels of the proposed mixed-use building.

It is staff's conclusion that Parcel B building would meet all the Objective Design Standards contained within the Precise Plan. It exhibits high design quality and provides a contemporary architectural design. The pedestrian level façade setbacks from the build-to-line do not exceed 10 feet, helping to create a pedestrian level setback for active uses with occupied floors above. Also, the first level of the building is differentiated from the upper floors to provide a visual enhancement for the floors above. The proposed building facades provide high quality materials appropriate for the area and the proposed design would be very complimentary to the adjacent faculty and staff housing building to the west.

Staff has no recommendations for Conditions of Approval for the proposed apartment building.

Subdivision Requirements

The application includes a Tentative Subdivision Map to subdivide the 22-acre Precise Plan area into six development parcels and five common parcels for private roadways (see Attachment F – Tentative Subdivision Map). Pursuant to Section 66474 of the Subdivision Map Act, a legislative body of a city or county may approve a subdivision map, including a condominium map, if it makes the following findings:

1. The proposed subdivision and/or design or improvement must be consistent with applicable general and specific plans.

    - The project includes a proposal to amend the General Plan designation from Residential – High Density (R-HD) and Commercial – Office (C-O) to Commercial – Mixed Use (C-MU). According to the City's General Plan, this designation is intended for mixed-use development in areas where the City intends to provide, through the Zoning Ordinance, regulatory incentives and/or requirements for developers to construct buildings which contain a vertical mix of uses, e.g. retail or restaurant uses at the street level and office or residential uses at levels above the street. The applicant's project exhibits these characteristics and therefore the Commercial – Mixed Use (C-MU) General Plan Land

Use Designation is appropriate for the proposed project and the project is consistent the policies contained within the General Plan for this land use designation.

2. The site must be physically suitable for the type and density of the proposed subdivision.

   - The project site is physically suitable to the development proposed by the Precise Plan, which are apartment buildings that would be built on large podiums. The subject site flat, easily allowing this type of construction, and has been previously disturbed and extensively graded to allow the construction of a high school with similar building footprints.

3. The design of the proposed subdivision or improvements must not cause substantial environmental damage or injure fish or wildlife or their habitat.

   - The environmental impact of the proposed Precise Plan was thoroughly evaluated in Environmental Impact Report (EIR). The EIR found that the Precise Plan would not cause substantial environmental damage or injure fish or wildlife or their habitat.

4. The design of the proposed subdivision must not cause serious public health problems.

   - There are no foreseeable public health problems that could arise from the implementation of the Precise Plan.

5. The design of the proposed subdivision or improvements must not conflict with any easements, acquired by the public at large, for access through or use of, property within the proposed subdivision.

   - Although several easements exist on the site, the proposed subdivision will be subject to a thorough plan check by the Public Works Department prior to recordation. Any issues related to underlying easements will be remedied at that time.

General Plan, Zoning, and Project Density

The General Plan land use designation for the JUHSD faculty and staff housing site (Parcel A) is Residential – High Density (R-HD) and the remainder of the project site is Commercial – Office (C-O). The Precise Plan would allow residential and commercial uses (some uses would require a Conditional Use Permit) on any parcel. The development program in the Precise Plan also provides guidelines for the proposed build out of the site with residential densities ranging from 34 to 96 dwellings units per acre. Since the Precise Plan would allow both residential and commercial uses on each parcel within the Plan Area, an amendment to the General Plan to change the land use designation to Commercial – Mixed Use (C-MU) is required.

The proposed Precise Plan would also implement the General Plan Housing Element which encourages the development of infill housing on sites that are underutilized, where residential development represents the highest and best use, and where public infrastructure exists to support the intensity of the proposed development. The Housing Element identifies this site specifically as

being capable of providing housing opportunities that contribute to the City's fulfillment of its Regional Housing Need Allocation.

Regarding zoning, Parcel A is currently zoned PD-31A while the remainder of the project site is zoned PD-31. Since the Precise Plan identifies a new vision and goals, development standards, and guidelines for the project area, a new Planned Development is required. Because Phase I of the 1985 Precise Plan located south of the project site is already built out with multi-family rental housing and school and medical uses, this area is excluded from the project and the General Plan designation and zoning shall remain Commercial – Office and PD-31 respectively.

The new zoning, which would pertain to the Precise Plan area only, would be PD-31B, replacing PD-31A for the staff and faculty housing site (see Attachment G – Draft Planned Development 31B Regulations).

Office Market and Fiscal Impact Study

JUHSD submitted an office market and fiscal impact study prepared by BAE Urban Economics, Inc. (BAE) to supplement their request for a zone change and commercial-mixed use neighborhood proposal (see Attachment H – Office Market Assessment and Fiscal Impact Review). The analysis evaluated the project site's potential to attract commercial office use and presented the results of the fiscal impact analysis of three recently approved residential projects in Daly City to demonstrate the potential for residential development to generate positive fiscal benefits for the City.

After review of the site's characteristics and Daly City's relative position in the regional economy and San Mateo County office market, the analysis concluded the project site is not a competitive location to attract office development. Office uses have been permitted with the PD-31 Plan area since 1985, but only one medical office building has been constructed. Located outside the Highway 101/Caltrain Corridor, the office sector in Daly City has failed to gain traction over the past few decades despite the presence of two Bay Area Rapid Transit (BART) stations and City efforts and investment to stimulate Class A office development. Further, the economic impacts of the COVID-19 pandemic have led to a short-term reduction of office demand driven by shelter-in-place orders and uncertainty on the long-term impact of the pandemic on regional office market demand.

As for residential development, the review of three fiscal impact analyses for recently approved Daly City residential projects concluded that in-fill development projects have yielded net positive impacts such as injecting additional retail spending power into the city that can support the City's existing and expanded retail centers and corridors.

The analysis also concluded that there is an important indirect fiscal benefit associated with new residential development specifically at this project site. Since JUHSD intends to ground lease the site for development which will generate an ongoing stream of cash rental payments, the new source of revenue will enhance JUHSD's operating budget and thus improve the quality of education in Daly City. The analysis noted that improved school quality has been documented to increase housing values in the communities where the schools are located and thus will increase

tax revenue for both JUHSD and Daly City. The project would stimulate a virtuous cycle that could improve the quality of City services and school district operations.

Affordable Housing

The terms of JUHSD providing affording housing in the Precise Plan area is contained in both the Development Agreement and proposed Planned Development 31B zoning regulations. Staff, the District, and the City Council's Affordable Housing Committee have made a significant effort to establish deeper levels of affordability for the project than City's current Inclusionary Housing Ordinance would otherwise require. The following summarizes the agreement reached between the City and JUHSD:

- Parcel C will provide 150 affordable housing units ranging from 23 percent AMI to 60 percent AMI;
- 24 units will be set aside for residents with Intellectual and Developmental Disabilities (IDD);
- 12 units will be at 23% AMI, with the intention that these families can qualify to utilize the on-site Head Start facility;
- 20 percent Affordable Housing representing double the affordable housing required by City's Inclusionary Housing Ordinance:
- Parcel C will include 150 affordable units plus 2 manager's units (13.5% of the proposed units in Parcels B through F) at Very Low and Low Income levels;
- Parcels D through F will include up to 73 units at Moderate Income levels; and
- The affordable housing developer will offer wrap-around support services for Parcel C residents.

Under the terms of the agreement, one market rate building may be built prior to the affordable housing and without Moderate Income units. After the first market rate building, each subsequent market rate building will be built with 10 percent of the units at Moderate Income. The final market rate building will be built with the number of Moderate-Income units necessary to bring the overall percentage of affordable units to 20 percent overall. Furthermore, the affordable housing parcel may be built with two affordable housing buildings. One affordable housing building with at least 60 units will be built before a second market rate rental housing building can built. After the first market rate building is built, the overall percentage of Very Low- and Low-Income affordable housing will not drop below 13.5% of the overall unit count (Parcels B through F).

In the unlikely event that the affordable housing project takes longer than anticipated to be built after the first market rate building is completed, contingencies will ensure affordable housing representing 13.5% of the units are provided.

Utility Providers

The subject property is located within a fully urbanized area and is already connected to all public services capable of serving the proposed master plan area.

Utility	***Provider***
Water, Sanitary Sewers, Storm Drains	City of Daly City / Bayshore Sanitary District
Gas & Electric	PG&E
Telephone	AT&T
Cable Television	Wave Cable Services and/or Comcast
Fire/Police Protection	Daly City

As indicated in the Conditions of Approval for the project, the applicant has completed water and sewer analyses, which make specific recommendations for infrastructure improvements that must be implemented by the project. The requirements to do are embodied in Conditions of Approval issued by the Department of Water and Wastewater Resources (DWWR).

Environmental Assessment

In accordance with the California Environmental Quality Act (CEQA), the City has prepared a Final Environmental Impact Report (FEIR) to assess the potential environmental consequences of implementing the proposed Precise Plan (see Attachment I – Final Environmental Impact Report). The FEIR incorporates the Draft EIR (DEIR), which the City made available for public review from July 25, 2023, through September 8, 2023. Copies of all written comments received on the DEIR are contained in the FEIR, as are responses to these comments. During the public review period, the City received comments from 38 interested parties. These comments are contained within the FEIR Appendix A: EIR Comment Letters.

In consideration of recommending that the City Council certify the Final Environmental Impact Report, the Planning Commission should be aware that the Draft Environmental Impact Report (DEIR) identified several significant environmental impacts associated with the project, including impacts to air quality, biology, cultural resources, geological resources, hazardous materials, noise, and transportation. A summary of these mitigation measures is provided in the Mitigation and Monitoring Program (MMRP) that has been prepared for the project and recommended for adoption (Attachment J – Mitigation and Monitoring Program).

Findings

Staff finds that, as conditioned, the proposed General Plan Amendment GPA-04-21-14998, Planned Development PD-04-21-14997, Major Subdivision SUB-04-21-14999, and Design Review DR-04-21-15000, comply with Title 17 (Zoning) of the Daly City Municipal Code. Approval of the proposed project would not be detrimental to the health, safety, morals, comfort and general welfare of persons residing in or working in the neighborhood, nor be injurious or detrimental to the property and improvements in the neighborhood or the general welfare of the city. Approval of the proposed Major Subdivision General Plan Amendment GPA-04-21-14998, Planned Development PD-04-21-14997, Major Subdivision SUB-04-21-14999, and Design

Review DR-04-21-15000**,** as conditioned herein, is in the best interest of the public health, safety, and general welfare of the community, and that the general site aesthetics have been incorporated to ensure compatibility with adjacent buildings and to provide an attractive environment. Staff recommends that the Planning Commission adopt the following findings, should it decide to forward the proposed project to the City Council with a recommendation for approval:

1. In accordance with Title 17 of the Daly City Municipal Code, as well as applicable State zoning enabling legislation, the Planning Commission conducted a public hearing to consider the project on December 5, 2023; notice of said hearing was by newspaper publication on November 23, 2023, posting and first class mailing to property owners within 300 feet;

2. The site is physically suitable for the type of proposed project and amending the General Plan designation for the Precise Plan area from Residential – High Density (R-HD) and Commercial – Office (C-O) to Commercial – Mixed Use (C-MU), and rezoning the Precise Plan area from Planned Development 31 (PD-31) and Planned Development 31A (PD-31A) to Planned Development 31B (PD-31B);

3. The proposed project is consistent with Daly City General Plan. The project in fact includes a proposal to amend the General Plan designation from Residential – High Density (R-HD) and Commercial – Office (C-O) to Commercial – Mixed Use (C-MU). According to the City's General Plan, this designation is intended for mixed-use development in areas where the City intends to provide, through the Zoning Ordinance, regulatory incentives and/or requirements for developers to construct buildings which contain a vertical mix of uses, e.g. retail or restaurant uses at the street level and office or residential uses at levels above the street. The applicant's project exhibits these characteristics and therefore the Commercial – Mixed Use (C-MU) General Plan Land Use Designation is appropriate for the proposed project and the project is consistent the policies contained within the General Plan for this land use designation;

4. The project also implements the policies in the Housing Element, which encourages the development of infill housing on sites that are underutilized, where residential development represents the highest and best use, and where public infrastructure exists to support the intensity of the proposed development. The Housing Element identifies the subject site specifically as being capable of providing housing opportunities that contribute to the City's fulfillment of its Regional Housing Need Allocation;

5. The site is physically suitable for the type and density of the proposed subdivision. The project site is physically suitable to the development proposed by the Precise Plan, which are apartment buildings that would be built on large podiums. The subject site flat, easily allowing this type of construction, and has been previously disturbed and extensively graded to allow the construction of a high school with similar building footprints;

6. The design of the proposed subdivision or improvements does not cause substantial environmental damage or injure fish or wildlife or their habitat. The environmental impact of the proposed Precise Plan was thoroughly evaluated in Environmental Impact Report (EIR);

The EIR found that the Precise Plan would not cause substantial environmental damage or injure fish or wildlife or their habitat;

7. The design of the proposed subdivision will not cause serious public health problems. There are no foreseeable public health problems that could arise from the implementation of the Precise Plan;

8. The design of the proposed subdivision and improvements do not conflict with any easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. Although several easements exist on the site, the proposed subdivision will be subject to a thorough plan check by the Public Works Department prior to recordation. Any issues related to underlying easements will be remedied at that time;

9. The proposed building for Parcel B complies with applicable provisions of Design Review Section 17.45 of the Zoning Ordinance and the Objective Design Standards set forth in the Precise Plan and Planned Development zoning, both herein recommended for approval to the City Council;

10. Architectural considerations have been incorporated in order to ensure the general compatibility of this development with the character of other adjacent buildings. These considerations include, but are not limited to, the character, scale and quality of the design, the architectural relationship with the site and other buildings, building materials, and colors;

11. In accordance with the California Environmental Quality Act (CEQA), the City issued a Notice of Completion for a Draft Environmental Impact Report (DEIR) prepared to evaluate the environmental impacts that could result from the shopping center expansion. The DEIR was submitted to the State Clearinghouse for public dissemination on July 25, 2023. The DEIR was circulated for comment for at least 45 days (from July 25, 2023 through September 8, 2023) in accordance with the requirements of CEQA;

12. The City has prepared a Final Environmental Impact Report (FEIR), incorporating the comments and responses to comments of the Draft Environmental Impact Report (DEIR), in accordance with the requirements of CEQA.

13. The Certification of the FEIR affirms the documentation that all of the project's environmental impacts have been mitigated to a level of insignificance. A Mitigation and Monitoring Reporting Program (MMRP) has also been adopted for the project;

14. The Planning Commission has reviewed the proposed Development Agreement and found it consistent with the City's General Plan; and

15. The project will minimize the risk to existing public improvements and adjacent private property by providing controlled stormwater runoff from the site to City facilities in full compliance with Order R-2 NPDES Permit No. CAS612008 and Order No. 2010-0014-

DWQ, NPDES No. CAS000002, the statewide National Pollutant Discharge Elimination System (NPDES) General Construction Activity Storm Water Permit.

Conditions of Approval

Staff recommends approval of General Plan Amendment GPA-04-21-14998, Planned Development PD-04-21-14997, Major Subdivision SUB-04-21-14999, and Design Review DR-04-21-15000, based on the following conditions as specified by each Department and Division. These conditions need to be complied with prior to, or as part of, any building permit for the proposed improvements.

A. DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT (PLANNING DIVISION)

General

1. The project shall be valid only in conjunction with detailed plans submitted with this project. Any modifications required, due to the Conditions of Approval, and minor changes to the plan, must be reviewed and approved by the Planning Division prior to the change. Major site or architectural modifications shall be treated as an amendment and shall be subject to review by the Planning Commission and City Council.

2. The tentative subdivision map approval granted herein shall be valid for a period of two years. If a final map has not been approved within this timeframe, the applicant shall apply for a time extension.

3. The design review approval granted herein shall be valid for a period of one year. If building permits have not been issued within this timeframe, the building shall comply with the Objectives Design Standards contained within Planned Development PD-31B.

Building Design

4. All retail/office areas shall be constructed to a "tenantable" condition and shall provide restroom facilities and receive wall, ceiling, and flooring finishes that render them in a leasable condition prior to final occupancy of the building. This includes commercial-grade wall and floor plugs, overhead lighting, and any other systems the Planning Division staff identifies at the time of plan check.

5. All ground floor windows shall be dark-colored aluminum and all upper-floor windows shall be metal framed or high-quality PVC with color to match the adjacent wall.

6. Any metal materials used on the exterior of any building shall be galvanized or treated in a manner acceptable to the Planning Division to prevent corrosion.

7. The applicant shall, prior to building permit submittal, provide a sign program for Planning Division review and approval. The final building elevation design shall consider sign placement and plans submitted for building permit approval shall reflect such placement.

8. All rooftop mechanical equipment shall be screened from the view of all adjacent public rights-of-way by screenwalls, painting, and similar treatments acceptable to the Planning Division. The Division may require screenwalls for equipment located within 20 feet of the rooftop parapet wall.

9. Backflow preventers, check devices, and other visible mechanical equipment shall be painted black, dark green, red (if required by the Fire Department), or other color complimentary to the building design.

10. The applicant shall have all trash storage capacity and pick-up locations approved by Republic Services.

11. The material of retaining walls visible from the public right-of-way shall be approved by the Planning Division in building permit plan check.

Stormwater Treatment

12. The applicant shall develop and submit a stormwater management plan that illustrates full compliance with Section C.3 of Order R-2-2009-0074 NPDES Permit No. CAS612008. The project must comply with Order No. 2010-0014-DWQ, NPDES No. CAS000002, the statewide National Pollutant Discharge Elimination System (NPDES) General Construction Activity Storm Water Permit.

13. The applicant shall receive approval of the stormwater management plan from a third-party reviewer appointed by the City prior to building permit submittal. The applicant shall pay the entire cost of the third-party reviewer, beginning with a $10,000 deposit from which the Planning Division may draw to pay for the costs from the third-party review and associated inspections.

14. All stormwater treatment facilities shall be inspected during construction to ensure eventual compliance with the stormwater management plan. The applicant shall pay the entire cost of these inspections.

15. The applicant shall enter into a Operation and Maintenance Agreement with the City to ensure long-term maintenance and servicing by the Property Owner of stormwater site design and treatment control measures according the approved Operation and Maintenance Plan.

16. The applicant shall arrange and pay for final inspection of installed treatment measure by the City's Special Inspector within 45 days of installation or project construction completion, whichever comes first.

B. DEPARTMENT OF PUBLCI WORKS (ENGINEERING DIVISION)

PRECISE PLAN

GENERAL

17. All improvements shall be consistent with the plans approved by the City Engineer and the Conditions of Approval. All improvements shall meet the latest California Building Code, California Fire Code, Daly City Municipal Code, and the City Standards and Specifications.

18. Provide "will serve letters" from the Pacific Gas and Electric Company (PG&E) for gas and electric services.

19. All improvements shall be installed, inspected and approved by the City Engineer prior to Engineering sign off for occupancy permits. In addition, as-built record plans of all improvements shall be submitted in a form acceptable to the City Engineer prior to Engineering sign off for occupancy permits.

20. All electrical and telecommunications services shall be provided through underground connections. There shall be no overhead drops. All existing overhead services and supporting poles along the project frontage and/or on the private property shall be removed, at the applicant's expense.

21. All utility services shall be underground. Said improvements shall conform to City of Daly City and affected Agency's standards.

22. All plans shall be accompanied by all required calculations and studies including geotechnical and impact studies to justify design signed and sealed by a licensed professional engineer.

23. Grading and improvement plan review and approval by the City Engineer are required before permit issuance. The improvement plans shall include details for on-site and off-site improvements for vehicular and pedestrian access, parking, traffic signs and markings, utility service connections, modifications and extensions of the City's sewer, water, storm drain, safety lighting, landscaping, and other public service facilities.

24. Securities for all improvements (on-site and off-site), and applicable fees and charges, shall be submitted with any site/building permits. The applicant shall obtain all required permits before commencing work.

25. The applicant and/or Contractor shall have a project sign with a 24-hour Project contact information for public concerns such as off-site tracking, dust control, noise complaints, ground shaking and any related construction activities. The complaints and responses shall be logged, and copies provided to the City Engineer with action status on a weekly basis.

26. Provide erosion and storm water pollution plan incorporating best management practices, including operation and maintenance provisions per the requirements applicable at the time of construction permit application. During the wet/rainy season (October 1 to April 30) the developer shall submit a revised erosion control plan as necessary (every five working days) or as required by the City Engineer and/or his representative.

27. Concurrent with each demolition, grading and drainage permit submittal or as a part of the Improvement Plan package, the Applicant shall prepare a dust control plan. The plan shall conform to the City Standards and comply with the requirements of the Bay Area Air Quality Management District (BAAQMD) Best Management Practices for dust control. The Applicant shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. The person shall respond and take corrective action within 48 hours.

28. No permanent building encroachment including but not limited to: awnings, canopies, marquees, signs, windows, balconies, architectural features and mechanical equipment shall be allowed in the Right-of-Way without the written authorization of the City Engineer.

29. The project's electrical transformer shall not be installed within the public right-of-way.

30. Phasing for the development of the JUHSD Serramonte Del Rey site shall follow the Development Agreement between the City and JUHSD.

31. A current title report shall be submitted with the development of each phase/parcel.

32. Prior to requesting approval for any Parcel Map or Final Map, all improvements, including on- and off-site improvements, and all public service and utility facilities required to serve the development, shall be completed by the applicant, or the applicant shall enter into a Subdivision Improvement Agreement with the City to secure the completion of the improvements within the time limit specified by the City.

33. The improvements shall be consistent with the plans approved by, and to the satisfaction of the City Engineer and the Conditions of Approval. All construction shall meet the latest California Building Code, California Fire Code, Daly City Municipal Code and the City Standard Specifications and Drawings. Securities for all required improvements, and applicable fees and charges, shall be submitted prior to permit issuance, and/or submission of the subdivision improvement agreement for approval. The applicant shall obtain all required permits before commencing work. All required improvements shall be constructed at no cost to the City except where specifically agreed to by the City under the provisions of a written agreement. Grading and improvement plan review and approval by the City Engineer are required before any City Permit is issued. The improvement plans shall include details for on-site and off-site improvements for vehicular and pedestrian access, parking, traffic signs and markings, utility service connections, modifications and extension of the City's sewer, water, storm drain, safety lighting, landscaping, and other public service and common facilities. All utility services shall be underground unless

otherwise approved. Said improvements shall conform to Daly City and affected Agency's standards. Plans shall be accompanied by all required calculations and studies including geotechnical and impact studies to justify design.

34. The applicant shall comply with the applicable requirements of the "City of Daly City General Conditions of Approval: Use Permits, Variances, Design Reviews, Planned Developments, and Subdivisions", in effect at the time of subdivision and design review application submittal, final map submittal and/or at the time of building permit application.

SITE

35. The applicant shall repair and/or replace additional areas of street pavement, sidewalk, curb, and gutter, streetlights, manhole, catch basins, or any other public infrastructure within the right-of-way damaged by construction activities associated with the project (utility installation, etc.) as required by the City Inspector during construction. Such repair shall be per the City's Standards and Specifications.

36. Bike parking for each phase shall be at street level and shall not require travel across parking lots to access.

37. Streets within the property shall be private streets with public access easements and public utility easements. All private streets parcels shall have a public access easement over the entire width and length of the parcel, and shall encompass the roadway, shoulders, and all sidewalks as part of the roadway sections. All proposed parks, bike and pedestrian paths, and trails for the project shall also have a public access easement over their areas.

38. Building overhangs for each parcel shall not be permitted unless an exception is provided by all City Departments.

39. Curb ramps in and around the project site shall utilize the case types in the Caltrans Standard Plans.

40. Design of the pavement sections shall be prepared by a licensed Civil Engineer and shall be reviewed and approved by the City Engineer. The design shall comply with City Standard Detail S-1.

41. Pavement design for Serramonte Blvd. shall be per a TI = 9 or shall match existing pavement section, whichever is more stringent.

42. Final striping plan shall be reviewed and approved by the City Engineer as part of the Site Improvement Permit.

43. Plans prepared by a licensed Civil Engineer shall be provided for the striping improvements along Campus Drive, Hickey Boulevard, and at the following intersections: Highway 1 ramps/Serramonte Boulevard, Skyline Boulevard/Hickey Boulevard, Callan Boulevard/Hickey Boulevard.

44. Radius of curves shall be clearly shown on the plans for all proposed streets.

GRADING

45. WDID number shall be provided to the City prior to the issuance of a Grading Permit for any project greater than one acre in size.

46. Grading exceeding 50 cubic yards shall require approval of plans and a grading permit. A licensed Civil Engineer shall prepare the grading plans and erosion control plan in conformance with a soil report prepared by a licensed soil engineer or qualified civil engineer in compliance with the NPDES requirements prior to any development on the property.

47. Grading plans shall be reviewed by an independent qualified Consulting Engineer or Geologist as well as the City Engineer; a letter of compliance from the independent qualified Consulting Engineer or Geologist shall be provided to Engineering prior to the issuance of any permit. The Engineer and/or Geologist, of record, shall be present on-site during the excavation and grading phases of the project and shall submit a written certification that the project civil plans has been implemented as approved.

48. The applicant shall provide fail-safe conditions for catastrophic events such as 100-year storms, seismic events, system overflows or failures. Drainage swales shall be provided at the top, intermediate and bottom of slopes and embankments to prevent erosion and degradation of slopes. The project geotechnical report shall include appropriate recommendations regarding the protection of existing and proposed slopes.

49. The soils report shall be finalized and resubmitted prior to any parcel or final map approval, and prior to building permit issuance. The preliminary soils report dated April 20, 2021 indicates that the "east slope has the potential for significant permanent displacements under the considered earthquake loads and could adversely undermine portions of the proposed structure foundations on Parcels B, C, and D." As required by the engineering division, the applicant shall be responsible for the costs associated with a third-party peer review of soils reports provided for buildings or subdivision, and the applicant's soils engineer shall address and incorporate the recommendations of the third-party peer review. Prior to subdivision improvement or building permit issuance, the applicant's soils engineer shall provide a letter stating that they have reviewed such plans and the plans incorporate the recommendations contained in their report.

STORM WATER/UTILITY

50. Runoff calculations shall be provided verifying that post development stormwater runoff from the site does not exceed the pre-development stormwater runoff. Additional stormwater runoff generated from the design storm as a result of this development shall be retained on-site.

51. Drainage from the site to a public storm drain system or street shall not flow over any sidewalk. On site drainage retention shall be provided to limit the flow rate entering the City's storm drain system to the pre-development rate. The retention facility shall accommodate the excess runoff from a storm of 10-year frequency and two-hour duration.

52. All stormwater retention, stormwater treatment, or other stormwater BMP improvements shall be located outside of the public right-of-way and maintained by the property owner. All privately owned and maintained improvements shall be located outside of the public right-of-way. There shall be no private improvements within the public right-of-way.

53. The applicant shall be financially responsible for all project-related storm drainage improvements on- and off-site, as required and approved by the City Engineer in accordance with City Standards.

54. Full trash capture devices approved by the City Engineer shall be installed on the drainage system.

55. Storm drain laterals and mains shall be CCTV'ed at the end of construction. Owner is responsible for providing videos of laterals and mains prior to the City Engineer's permit signoff/acceptance. It is the owner's responsibility to make required changes to provide camera access.

56. The applicant shall coordinate review of the on-site sanitary sewer system with the Department of Water and Wastewater Resources (DWWR). The new sewer mains shall require CCTV inspection by DWWR.

57. The applicant shall contribute a fair-share cost of the new 30-inch relief sewer crossing I-280. The fair share contribution shall be based on the added flows relative to the additional capacity needed for the new I-280 crossing as determined by the Department of Water and Wastewater Resources.

58. Post-development storm runoff discharged shall be discharged a rate and volume less than or equal to the pre-development runoff rate and volume and supported by satisfactory hydraulic calculations along with a letter from the engineer of record indicating that the proposed storm drain system does not increase runoff above the pre-development condition for the entirety of the project site. Individual phases shall not increase runoff rate above the pre-development condition for the entirety of the project site at any time. The hydraulic calculations and letter shall be submitted for review and approval by the City Engineer prior to approval of each set of Improvement Plans. The master plan's on-site drainage system shall be designed to limit runoff volumes to those during a ten-year frequency storm, to the extent feasible and limited to areas where not otherwise unsupported by an approved Geotechnical report or environmental document, to the satisfaction of the Engineering Division.

59. At no point or particular during Master Plan development will the peak flow or volume exceed pre-project conditions at any point on the site perimeter where flow enters the City

system. A particular phase may overcompensate but will not cause the Master Plan to undercompensate at any time. Phased retention systems will be subject to review by the Engineering Division of Public Works and may require each project to enter into a stormwater retention agreement that will be recorded against the property.

60. Regardless of how the project is phased, at no point shall the project peak runoff exceed the pre-project peak runoff.

61. The existing City-owned stormwater system shall be modeled/analyzed during each phase for all private connections to the City's storm drain system to ensure that existing City facilities have sufficient capacity. Any public stormwater improvements or capacity increase shall be studied and borne by the developer in accordance with City standards. As part of the analysis, investigate how the water outflows when all site drainage is plugged and provide the water elevation in relation to the lowest finished building grade.

TRAFFIC

62. Recommendations from the JUHSD Precise Plan traffic study shall be implemented by the applicant.

63. Final layout for Serramonte Blvd. and the Serramonte Blvd./Highway 1 on/off-ramp intersection shall be reviewed and approved by the City Engineer.

MAPPING

64. All ROW dedication/easement (public and private) language shall be reviewed and approved by the City Engineer.

65. The width and locations of Public Easements shall be specified for review and approval by all utility companies and the City Engineer.

PERMIT

66. An encroachment permit shall be required to be issued by the Public Works Department for all work proposed within the public right-of-way.

67. The applicant shall provide verification, in writing, that the joint trench design has been reviewed and approved by each utility company.

PARCEL B DEVELOPMENT

GENERAL

68. All improvements shall be consistent with the plans approved by the City Engineer and the Conditions of Approval. All improvements shall meet the latest California Building Code,

California Fire Code, Daly City Municipal Code, and the City Standards and Specifications.

69. Provide "will serve letters" from the Pacific Gas and Electric Company (PG&E) for gas and electric services.

70. All improvements shall be installed, inspected and approved by the City Engineer prior to Engineering sign off for occupancy permits. In addition, as-built record plans of all improvements shall be submitted in a form acceptable to the City Engineer prior to Engineering sign off for occupancy permits.

71. All improvements shall be ADA compliant. Curb ramps in and around the project site shall utilize the case types in the Caltrans Standard Plans.

72. Traffic signalization plans for the intersection of Serramonte Blvd. and Highway 1 shall be included in the improvement plans for review and approval by the City Engineer. Developer shall also obtain all necessary Caltrans permits and approvals.

73. All electrical and telecommunications services shall be provided through underground connections. There shall be no overhead drops. All existing overhead services and supporting poles along the project frontage and/or on the private property shall be removed, at the applicant's expense.

74. All utility services shall be underground. Said improvements shall conform to City of Daly City and affected Agency's standards.

75. All plans shall be accompanied by all required calculations and studies including, but not limited to, storm drain, geotechnical, and impact studies to justify design signed and sealed by a licensed professional engineer.

76. Grading and improvement plan review and approval by the City Engineer are required before permit issuance. The improvement plans shall include, but not limited to, details for on-site and off-site improvements for vehicular and pedestrian access, parking, traffic signs and markings, utility service connections, modifications and extensions of the City's sewer, water, storm drain, safety lighting, landscaping, and other public service facilities.

77. Securities for all improvements (on-site and off-site), and applicable fees and charges, shall be submitted with any site/building permits. The applicant shall obtain all required permits before commencing work.

78. The applicant and/or Contractor shall have a project sign with a 24-hour Project contact information for public concerns such as off-site tracking, dust control, noise complaints, ground shaking and any related construction activities. The complaints and responses shall be logged, and copies provided to the City Engineer with action status on a weekly basis.

79. Provide erosion and storm water pollution plan incorporating best management practices, including operation and maintenance provisions per the requirements applicable at the time of construction permit application. During the wet/rainy season (October 1 to April 30) the developer shall submit a revised erosion control plan as necessary (every five working days) or as required by the City Engineer and/or his representative.

80. Concurrent with each demolition, grading and drainage permit submittal or as a part of the Improvement Plan package, the Applicant shall prepare a dust control plan. The plan shall conform to the City Standards and comply with the requirements of the Bay Area Air Quality Management District (BAAQMD) Best Management Practices for dust control. The Applicant shall post a publicly visible sign with the telephone number and person to contact regarding dust complaints. The person shall respond and take corrective action within 48 hours.

81. No permanent building encroachment including but not limited to: awnings, canopies, marquees, signs, windows, balconies, architectural features and mechanical equipment shall be allowed in the Right-of-Way without the written authorization of the City Engineer.

82. The project's electrical transformer shall not be installed within the public right-of-way.

83. Phasing for the development of the JUHSD Serramonte Del Rey site shall follow the Development Agreement between the City and JUHSD.

84. A current title report shall be submitted with the development of each phase/parcel.

85. Prior to requesting approval for any Parcel Map or Final Map, all improvements, including on- and off-site improvements, and all public service and utility facilities required to serve the development, shall be completed by the applicant, or the applicant shall enter into a Subdivision Improvement Agreement with the City to secure the completion of the improvements within the time limit specified by the City.

86. The improvements shall be consistent with the plans approved by, and to the satisfaction of the City Engineer and the Conditions of Approval. All construction shall meet the latest California Building Code, California Fire Code, Daly City Municipal Code and the City Standard Specifications and Drawings. Securities for all required improvements, and applicable fees and charges, shall be submitted prior to permit issuance, and/or submission of the subdivision improvement agreement for approval. The applicant shall obtain all required permits before commencing work. All required improvements shall be constructed at no cost to the City except where specifically agreed to by the City under the provisions of a written agreement. Grading and improvement plan review and approval by the City Engineer are required before any City Permit is issued. The improvement plans shall include details for on-site and off-site improvements for vehicular and pedestrian access, parking, traffic signs and markings, utility service connections, modifications and extension of the City's sewer, water, storm drain, safety lighting, landscaping, and other public service and common facilities. All utility services shall be underground unless

otherwise approved. Said improvements shall conform to Daly City and affected Agency's standards. Plans shall be accompanied by all required calculations and studies including geotechnical and impact studies to justify design.

87. The applicant shall comply with the applicable requirements of the "City of Daly City General Conditions of Approval: Use Permits, Variances, Design Reviews, Planned Developments, and Subdivisions", in effect at the time of subdivision and design review application submittal, final map submittal and/or at the time of building permit application.

88. Homeowners Association (HOA) agreements to be reviewed and approved by the City Attorney. This includes, but is not limited to, details regarding street sweeping, street maintenance, streetlight maintenance, landscape maintenance, private storm drain maintenance, etc.

89. The Applicant shall design and construct the traffic signal and certain bicycle and pedestrian improvements at the Highway 1 Ramps/Serramonte Boulevard intersection.

90. Haul route to the project site shall be from the Highway 1 off-ramp, across the intersection of Serramonte Blvd. and the Highway 1 on/off-ramps, to Entry Dr. Haul route from the project site shall be from Entry Dr., across the intersection of Serramonte Blvd. and the Highway 1 on/off-ramps, to the Highway 1 on-ramp. No trucks shall be allowed on Serramonte Blvd. outside of the intersection with Entry Dr., and no other City streets aside from Hickey Blvd. shall be used as a truck route.

SITE

91. The applicant shall repair and/or replace additional areas of street pavement, sidewalk, curb, and gutter, street lights, manhole, catch basins, or any other public infrastructure within the right-of-way damaged by construction activities associated with the project (utility installation, etc.) as required by the City Inspector during construction. Such repair shall be per the City's Standards and Specifications.

92. Bike parking for each phase shall be at street level and shall not require travel across the parking lot to access.

93. Streets within the property shall be private streets with public access easements and public utility easements. All private streets parcels shall have a public access easement over the entire width and length of the parcel, and shall encompass the roadway, shoulders, and all sidewalks as part of the roadway sections. All proposed parks, bike and pedestrian paths, and trails for the project shall also have a public access easement over their areas.

94. The existing sidewalk along Callan Blvd. shall be repaired to prolong its life and eliminate tripping hazards as needed.

95. Applicant shall widen the existing sidewalk on Callan Blvd. at three locations along the 740' frontage. This will create three passing zones approximately 8' long with a width of 5', at locations to be determined during site improvement permit plan check.

96. Applicant shall provide a treated lumber retaining wall along the hillside adjacent to the sidewalk on an as-needed basis to reduce sloughing of soil onto the sidewalk. The length of retaining wall that will be needed is estimated at approximately 50% of the 740' sidewalk.

97. The improvements described above will be completed as each building on parcel fronting Callan Blvd. (parcels B, C and D) is built. City and Applicant shall enter into the City's standard landscape maintenance agreement of the lumber retaining wall if placed within the City's right-of-way on Callan Blvd., which will be recorded against the property fronting the improvements.

98. Design of the pavement sections shall be prepared by a licensed Civil Engineer and shall be reviewed and approved by the City Engineer. The design shall comply with City Standard Detail S-1.

99. Pavement design for Serramonte Blvd. shall be per a TI = 9 or shall match existing pavement section, whichever is more stringent.

100. The developer shall construct pavement improvements within the boundaries of the intersection of Serramonte Blvd. and Entry Dr. (Highway 1 on/off-ramps).

GRADING

101. WDID number shall be provided to the City prior to the issuance of a Grading Permit for any project greater than one acre in size.

102. Grading exceeding 50 cubic yards shall require approval of plans and a grading permit. A licensed Civil Engineer shall prepare the grading plans and erosion control plan in conformance with a soil report prepared by a licensed soil engineer or qualified civil engineer in compliance with the NPDES requirements prior to any development on the property.

103. Grading plans shall be reviewed by an independent qualified Consulting Engineer or Geologist as well as the City Engineer; a letter of compliance from the independent qualified Consulting Engineer or Geologist shall be provided to Engineering prior to the issuance of any permit. The Engineer and/or Geologist, of record, shall be present on-site during the excavation and grading phases of the project and shall submit a written certification that the project civil plans has been implemented as approved.

104. The applicant shall provide fail-safe conditions for catastrophic events such as 100-year storms, seismic events, system overflows or failures. Drainage swales shall be provided at the top, intermediate and bottom of slopes and embankments to prevent erosion and

degradation of slopes. The project geotechnical report shall include appropriate recommendations regarding the protection of existing and proposed slopes.

105. The soils report shall be finalized and resubmitted prior to any parcel or final map approval, and prior to building permit issuance. The preliminary soils report dated April 20, 2021 indicates that the "east slope has the potential for significant permanent displacements under the considered earthquake loads and could adversely undermine portions of the proposed structure foundations on Parcels B, C, and D." As required by the engineering division, the applicant shall be responsible for the costs associated with a third party peer review of soils reports provided for buildings or subdivision, and the applicant's soils engineer shall address and incorporate the recommendations of the third party peer review. Prior to subdivision improvement or building permit issuance, the applicant's soils engineer shall provide a letter stating that they have reviewed such plans and the plans incorporate the recommendations contained in their report.

STORM WATER/UTILITY

106. Runoff calculations shall be provided verifying that post development stormwater runoff from the site does not exceed the pre-development stormwater runoff. Additional stormwater runoff generated from the design storm as a result of this development shall be retained on-site.

107. Drainage from the site to a public storm drain system or street shall not flow over any sidewalk. On site drainage retention shall be provided to limit the flow rate entering the City's storm drain system to the pre-development rate. The retention facility shall accommodate the excess runoff from a storm of 10-year frequency and two-hour duration.

108. All stormwater retention, stormwater treatment, or other stormwater BMP improvements shall be located outside of the public right-of-way and maintained by the property owner. All privately owned and maintained improvements shall be located outside of the public right-of-way. There shall be no private improvements within the public right-of-way.

109. The applicant shall be financially responsible for all project-related storm drainage improvements on- and off-site, as required and approved by the City Engineer in accordance with City Standards.

110. Full trash capture devices approved by the City Engineer shall be installed on the drainage system.

111. Storm drain laterals and mains shall be CCTV'ed at the end of construction. Owner is responsible for providing videos of laterals and mains prior to the City Engineer's permit signoff/acceptance. It is the owner's responsibility to make required changes to provide camera access.

112. The applicant shall coordinate review of the on-site sanitary sewer system with the Department of Water and Wastewater Resources (DWWR). The new sewer mains shall require CCTV inspection by DWWR.

113. The applicant shall contribute a fair-share cost of the new 30-inch relief sewer crossing I-280. The fair share contribution shall be based on the added flows relative to the additional capacity needed for the new I-280 crossing as determined by the Department of Water and Wastewater Resources.

114. Post-development storm runoff discharged shall be discharged a rate and volume less than or equal to the pre-development runoff rate and volume and supported by satisfactory hydraulic calculations along with a letter from the engineer of record indicating that the proposed storm drain system does not increase runoff above the pre-development condition for the entirety of the project site. Individual phases shall not increase runoff rate above the pre-development condition for the entirety of the project site at any time. The hydraulic calculations and letter shall be submitted for review and approval by the City Engineer prior to approval of each set of Improvement Plans. The master plan's on-site drainage system shall be designed to limit runoff volumes to those during a ten-year frequency storm, to the extent feasible and limited to areas where not otherwise unsupported by an approved Geotechnical report or environmental document, to the satisfaction of the Engineering Division.

115. The existing City-owned stormwater system shall be modeled/analyzed for all private connections to the City's storm drain system to ensure that existing City facilities have sufficient capacity. Any public stormwater improvements or capacity increase shall be studied and borne by the developer in accordance with City standards. As part of the analysis, investigate how the water outflows when all site drainage is plugged and provide the water elevation in relation to the finished building grade.

TRAFFIC

116. Recommendations from the JUHSD Precise Plan traffic study shall be implemented by the applicant.

117. The restriping and timing of the signalization at the Hickey Blvd/Callan Blvd. intersection will be complete no later than at final Certificate of Occupancy for the first housing project to be built.

MAPPING

118. All ROW dedication/easement language shall be reviewed and approved by the City Engineer.

119. The width and locations of Public Easements shall be specified for review and approval by all utility companies and the City Engineer.

PERMIT

120. An encroachment permit shall be required to be issued by the Public Works Department for all work proposed within the public right-of-way.

121. The applicant shall provide verification, in writing, that the joint trench design has been reviewed and approved by each utility company.

C. DEPARTMENT OF WATER AND WASTEWATER RESOURCES

122. The project is within the I280 drainage basin which is deficient in capacity. A project is in the planning stages to increase capacity. The Serramonte Del Rey Development shall pay its fair share cost in in the I280 Sewer Capacity Project. Until they determine exactly what they will construct, we cannot provide the exact dollar amount for their contribution.

123. The water and sewer systems, both public and private, shall be constructed per the Daly City Standard Specifications and Drawings and be constructed as if it were public infrastructure.

124. All costs associated with any water and sewer improvements, relocations and abandonments, as a result of this project, shall be borne by the developer.

125. If the project changes form, additional water and sewer studies may, at DWWR's discretion, be required, and all costs for any required studies shall be at the cost of the developer.

D. NORTH COUNTY FIRE AUTHROITY / DALY CITY FIRE DEPARMENT

126. Comply with California Fire & Building Codes, as well as the Daly City Municipal Code, specifically regarding fire apparatus access and Emergency Escape & Rescue Opening (EERO) requirements.

127. Fire sprinkler systems required. Submit plans to NCFA under separate fire permit.

128. Provide fire flow information per CFC, Appendix B.

129. Fire extinguishing/hood system may be required. Submit plans to NCFA under separate fire permit.

130. Monitored fire alarm systems required. Submit plans to NCFA under separate fire permit.

131. Key Boxes are required. Visit KnoxBox.com for appliances.

132. Portable fire extinguishers(s) are required. Mount fire extinguishers 3-5 feet above floor.

133. Illuminated address identification is required.

134. Utility identification is required.

135. Doors shall be easily openable in one motion without special knowledge, key or effort per CBC. Use of thumb operated deadbolts prohibited unless integrated with latch.

136. Illuminated exit signs and emergency egress illumination is required.

137. Hazardous material use, storage, or operations permit may be required.

138. Ensure Emergency Responder Radio Coverage is provided as required by Fire Code Section 510 and San Mateo County Fire Chief's Policy.

139. Elevators must be designed to accommodate EMS gurneys.

140. Fire Department Air Supply System may be required.

141. The proposed location of equipment required for Fire Service use (i.e. smoke control, fire service control room, fire alarm panels, etc.) must be reviewed and approved by NCFA.

142. An Emergency Plan and signage must be reviewed and approved by NCFA prior to occupancy.

Staff Recommendation

Staff recommends that the Planning Commission recommend to the City Council that it:

1. Approve General Plan Amendment GPA-04-21-14998 to change the General Plan designation from Residential – High Density (R-HD) and Commercial – Office (C-O) to Commercial – Mixed Use (C-MU);

2. Approve Planned Development PD-04-21-14997, rezoning project site from Planned Development PD-31 and Planned Development 31A to a new Planned Development PD-31B;

3. Approve Major Subdivision SUB-04-21-14999, to subdivide the project site into six development parcels and additional street parcels with public access easements

4. Approve Design Review for the site and building design for the proposed development and site improvements on Parcel B;

5. Certify the Final Environmental Impact Report and adopt a Mitigation Monitoring and Report Program for the project.

Staff is available to provide any additional information desired by the Planning Commissioners.

Respectfully submitted,

Michael Van Lonkhuysen
Planning Manager

Tatum Mothershead
Director of Economic and Community Development

Attachments
Attachment A – Location Map
Attachment B – Draft Precise Plan
Attachment C – Serramonte Del Rey Draft Development Agreement Summary
Attachment D – Proposed Draft Development Agreement
Attachment E – Design Review Submittal for Parcel B
Attachment F – Tentative Subdivision Map
Attachment G – Draft Planned Development 31B Regulations
Attachment H – Office Market Assessment and Fiscal Impact Review
Attachment I – Final Environmental Impact Report
Attachment J – Mitigation and Monitoring Program

ATTACHMENT A

Serramonte Del Rey Campus

699 Serramonte Blvd, Daly City

Serramonte Del Rey Precise Plan

9-1-2023

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1. Introduction

A. OVERVIEW

\The Serramonte Del Rey Precise Plan (Precise Plan) will enable the Jefferson Union High School District (JUHSD) to transform their existing outdated high school facilities into a new walkable, bikeable and family-friendly residential neighborhood with retail, park, Head Start, and surrounding recreational trail improvements. The Precise Plan envisions development of up to 1,113 units of affordable and market rate rental housing on leased District lands to be built-out over a multi-year period. The Serramonte Del Rey neighborhood will be an inviting and family friendly place to walk, shop, connect with friends, meet for coffee, or stroll through the park and hillside open spaces.

An example of an open space similar to the proposed Central Green in the Serramonte Del Rey neighborhood.

The entry to the neighborhood will be a lively and welcoming place.

The Precise Plan update focuses on the 22-acre Phase II area of the 1985 Serramonte Del Rey Precise Plan (PD 31). The Phase II area is the location of the existing JUHSD school facilities currently used for District office space, as well as 122 units of multi-family faculty and staff rental housing approved as PD 31A which was completed in 2022. Phase 1 of the 1985 Precise Plan is already built-out with multi-family rental housing, office, and educational uses. See Figure 1.1.

The Precise Plan identifies the vision, goals, and objective design standards for individual development proposals on a parcel basis, as well as park, open space, street, and utility infrastructure improvements associated with development by phase. The development of the neighborhood is guided by a parcelization plan, comprised of streets, development parcels and access easements, that set the walkable scale of the neighborhood. The administration and implementation section provides guidance to developers and Daly City staff on the Precise Plan conformance review and design review approval process consistent with the City's General Plan, ordinances, and procedures.

Figure 1.1 Existing and Updated Plan Area Boundaries

B. DISTRICT INTENT

The JUHSD School Board seeks to build upon their past success and advance an innovative plan to stabilize District finances and fund the future of student education. To accomplish this the District plans to attract investment and leverage the development of rental housing through long-term ground leases and/or joint venture agreements on District lands in the Precise Plan Area. The District's key intent is to stabilize education funding and improve the quality of life for students, neighbors, and the City. Improving the quality of education at District schools will boost neighborhood property values, as will the development of new neighborhood character that will serve retail, community, park, and recreation facilities. New housing will increase City tax revenues.

The Faculty and Staff Housing project along Serramonte Boulevard, completed in 2022, is the first step to build-out the Serramonte Del Rey neighborhood. This project provides affordable housing for teachers and staff members, which helps attract and retain highly qualified teachers and staff, as well as build collaborative relationships among teachers, students, and the broader community they serve.

C. PHYSICAL SETTING

The Serramonte Del Rey site (referred to as the Plan Area in this document) is owned by the Jefferson Union High School District (JUHSD). The 22-acre Plan Area is in the southern portion of Daly City with significant frontage along Serramonte Boulevard and Callan Boulevard with access to Highway 1 along the northern edge of the site. This unique location is a gateway into Daly City. Figure 1.2 shows the regional location and Figure 1.3 shows the surrounding context of the Plan Area.

View of Faculty and Staff Housing from Serramaonte Boulevard.

Adjacent Land Uses

A variety of residential and retail uses are located within a quarter mile (five-minute walking distance) from the Plan Area. Direct access to Serramonte Boulevard and Hickey Boulevard connects the Plan Area to many existing community destinations that surround the project site. Destinations include the Serramonte Shopping Center, Serramonte Plaza, Gellert Park, and Serramonte Library, as well as adjacent neighborhoods and schools. The existing site is surrounded by high density rental apartments on the north and south sides, low density residential on the west side, Chinese Cemetery and Gellert Park on the east side. The project site is centrally located within the Jefferson Union High School District with JUHSD schools located north and south of the site.

Site Access

As seen in Figure 1.3, the Plan Area is connected to major arterials, including Highway 1, Interstate 280, and State Route 35 (Skyline Boulevard). The site is also accessible by public transit: the Colma and South San Francisco BART stations are both approximately two miles away from the project site, and there is an existing SamTrans bus stop serving Route 120 at the project entry along Serramonte Boulevard. In addition, many surrounding streets have bicycle facilities, including Class II bicycle lanes on Ser-

ramonte Boulevard south of Callan Boulevard, Callan Boulevard south of Serramonte Boulevard, and Class III bicycle facilities on Serramonte Boulevard west of Callan Boulevard.

Plan Area Character

The existing Plan Area site is a level plateau on an east-facing slope. It is at a higher elevation than the land to the east of Callan Boulevard, and at a lower elevation than the residential neighborhood to the west along St. Francis Boulevard. Because of the site's orientation and high elevation, there are expansive views of the San Bruno Mountains and city skyline to the east and north. Farther to the west is a ridge separating the Plan Area from the Pacific Ocean, providing a temperate marine climate to the Plan Area and surroundings. The site is framed on its eastern and western sides by sloping hillsides with dense evergreen trees. These forested areas, along with the change in grade, create a buffer from developed areas on the west, north and east sides of the Plan Area.

The Plan Area is occupied by 122 units of faculty and staff housing at Parcel A and a decommissioned high school building, partially used as administrative offices. The former high school facility is a large, contiguous single-story building with mostly blank walls facing its surroundings. It needs significant seismic upgrades to the structure. The site itself is clean, flat and of a sufficient size to accommodate a new neighborhood.

Figure 1.2 Regional Location (looking north)

Figure 1.3 Context Map (looking south)

Figure 1.4 Existing Conditions and Topography

D. PLANNING CONTEXT

Daly City General Plan 2030

The Precise Plan update is consistent with the goals and policies of the 2030 Daly City General Plan as amended with the 2015 Housing Element.

Faculty and Staff Housing

On Parcel A is a 122-unit housing project built for and occupied by JUHSD faculty and staff, completed in 2022 and zoned Planned Development PD-31A.

Inclusionary Housing Ordinance

One of the City's housing goals is to encourage the development of housing that is affordable to both renters and owners, and for households of all income levels. The Inclusionary Housing Ordinance identifies requirements for the provision of affordable housing as part of new housing development in the City. The residential development within the Plan Area will provide affordable housing as required by ordinance and per the Serramonte Del Rey Precise Plan Development Agreement and Affordable Housing Agreement.

Municipal Ordinance

The Daly City Municipal Code designates the Plan Area as a "Planned Development District (PD31)". A Planned Development district allows various types of development such as neighborhood shopping centers, professional and administrative areas, commercial service centers, industrial parks, single-family, multi-family residential, or a combination of any of the above-mentioned uses.

Uses in a planned development district shall be permitted based on the general category of uses identified in the Precise Plan. General provisions for a planned development that apply to the Precise Plan are established in Section 17.28.020 of the Municipal Code.

1985 Precise Plan (PD31)

The 1985 Precise Plan extends from Hickey Boulevard at the south to Serramonte Boulevard at the north. The 1985 Precise Plan envisioned two phases of development with the closure of the Jefferson Union High School. The first phase of housing, office and Summit Shasta Charter High School was developed south of the existing high school. The Faculty and Staff housing was entitled under the PD31 Precise Plan by General Plan Amendment GPA-9-18-13666 and Zone Change ZC-9-18-13662. The remainder of the 22-acre second phase of permitted development has not been realized and is the subject of this Precise Plan Update. Provisions for Phase II 1985 Precise Plan are as follows:

Land Use

- Open Space (5.4 acres)
- Residential or Office (5.0 acres)
- Office (9.9 acres)
- Streets (2.0 acres)

Land Density and Intensity

- **Residential:** 35 DU/AC; up to 175 apartments
- **Commercial:** .77 FAR (Floor Area Ratio) if no residential
- **Office space:** Up to 700,000 sq. ft. office (the 22 acre site has two development sites, one that permits 500,000 sq. ft. office and a second that permits 200,000 sq. ft of office or 175 apartments)

Height limits

- Apartment buildings are limited to 3 stories over a partially depressed garage.
- Office buildings are limited to 6 stories along Callan Boulevard, increasing to a maximum of 12 stories at the center of the project.
- Office buildings are to be built along the eastern edge of the site to take advantage of the views and to be visible from the I-280 and Highway 1 freeways. Apartments to be tucked back against the western slope bank.
- Text concerning Visual Quality/Community Character states: "Buildings over six stories will be placed on an east/west axis to minimize impacts on the St. Francis views."
- Structured Parking: Residential: 175 spaces; Office: 1,252 spaces.
- Surface Parking: Residential: 125 spaces; Office: 498 spaces.
- Residential parcels will conform with Daly City parking standards. For multiple-family residential, this amounts to 1 space per studio, 1.5 spaces per one bedroom, and 2 spaces per two-bedroom unit or larger.

These provisions continue to govern the southern part of the PD31 Precise Plan. For the northern part (the Plan Area) they are included for reference only; upon adoption of the Serramonte Precise Plan Update, they will be fully replaced by the provisions included in the following pages.

2. Vision and Goals

A. VISION

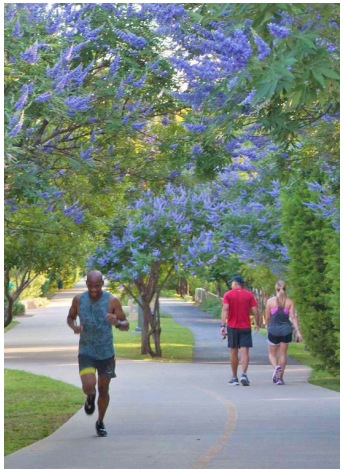
Experience

The Serramonte Del Rey Precise Plan enables the transformation of a 22-acre, former high school site with outdated facilities and surface parking to become the home of future residents who will experience:

- A new walkable, bikeable and family-friendly residential neighborhood with tree-lined streets;
- The convenience and activity of local retail and café life;
- A collection of parks, open spaces and recreational trails for use by all ages;
- Architecture for modern living, with amenities and contemporary, sustainable design;

Walkable tree-lined streets will enhance the neighborhood.

Aerial view of the Plan Area showing proximity to Pacific Ocean.



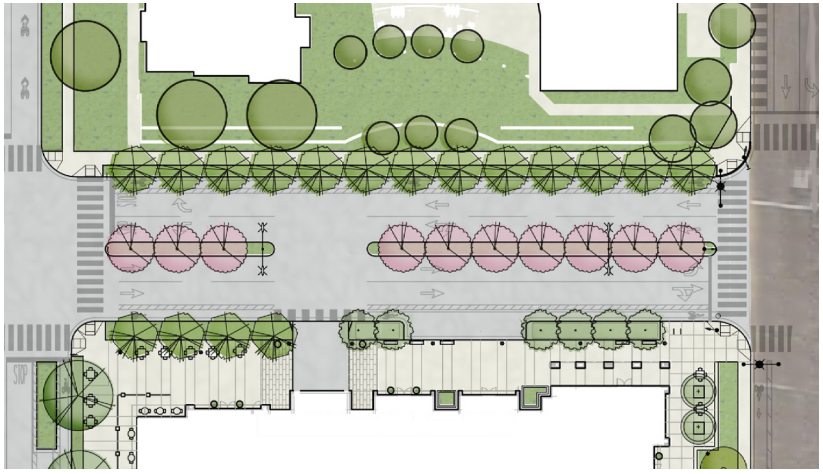
Open space and recreation areas will serve all age groups.

- A diverse residential neighborhood that includes units affordable to low and very low income levels;
- Access "a moment away" to Daly City's coastal bluffs overlooking the Pacific Ocean from Highway 1 and Skyline Boulevard;
- Scenic views to San Bruno Mountain and the San Francisco Bay;
- A highly accessible location with direct transportation and transit access to major job centers in San Francisco and along the San Mateo Peninsula;
- Regional shopping and Gellert Park within walking distance
- One of the world's best climates, with the beautiful, diverse ecology of a coastal zone and a Mediterranean climate with mild, wet, frostless winters and cool summers.

Illustrative Plan

Figure 2.1 is an illustrative plan of the build-out of the plan area, featuring neighborhood-serving retail, public gathering spaces and residential development linked together by a network of pedestrian-scale tree-lined streets. Main features of the plan are:

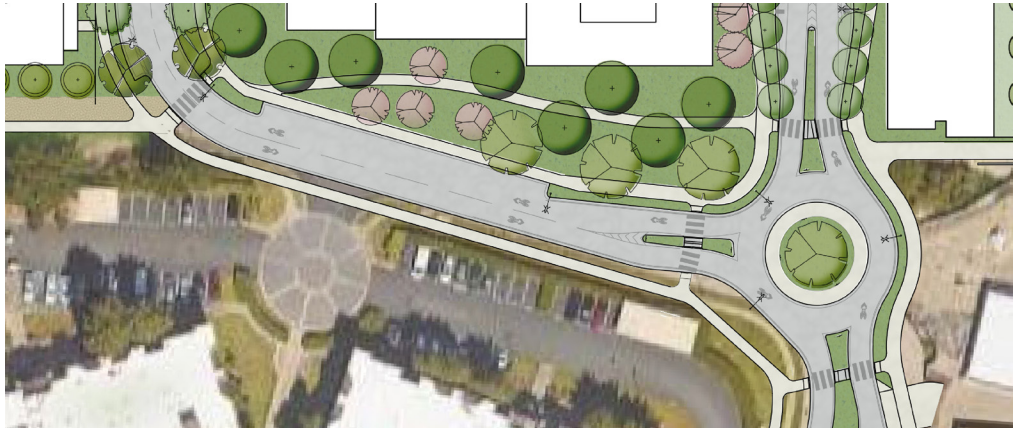
Mixed-Use Main Street. Entry Drive is the plan area's Main Street and entrance to the neighborhood, extending from the intersection of Serramonte Boulevard and Highway 1 ramps to the Central Green on North Drive. On the east side of the street is a mixed-use commercial and residential development with ground floor retail uses. This lively area features uses such as a café and retail shops opening onto tree-lined gathering spaces with outdoor seating. The activity generated during the days and evenings will provide an attractive and welcoming environment for residents, visitors, and surrounding neighbors, visible along Serramonte Boulevard and from travelers entering and exiting from Highway 1.



Entry Drive will provide a landscaped entry into the neighborhood.

Housing Shapes Public Spaces. The streets are lined with residential buildings organized around the Central Green, an urban park at the heart of the neighborhood. Buildings vary from four to seven stories around the Central Green. Up to two 14-story towers are permitted. The buildings are to be of contemporary, high quality architectural design. Design standards shape an attractive pedestrian oriented streetscape experience, with attention to ground floor, podium, and tower building massing. Buildings are designed as courtyard housing, each with an internal landscaped courtyard at grade or above a parking podium. Where a building is adjacent to public Hillside Area open space, the courtyard space opens to connect to the surrounding open space visually and physically.

Pedestrian-Scale Neighborhood. The Plan Area is organized into walkable, pedestrian-scale streets and city blocks, each with a different character. Entry Drive provides a transition from the higher vehicle volumes on Serramonte Boulevard to quieter neighborhood streets. North Drive extends east and west along the Central Green with East Drive and West Drive wrapping around the Central Green so every street in the plan is accessible to this neighborhood park. North Drive and East Drive are local connector streets that prioritize pedestrians and cyclists with protected bike lanes and large street trees. West Drive is a narrower neighborhood



A landscaped roundabout at the south entry will provide a gateway to the neighborhood.

street with individual ground floor unit entries or residential stoops. Three access ways provide access to residential parking, Overlook Park, wooded hillside areas, the eastside recreational pedestrian/bike trail and westside walking path. At the south entrance to the Plan Area is a landscaped roundabout providing a traffic-calmed entrance to the neighborhood.

Bike and Transit Access. The neighborhood is safe and convenient for bicycling with connections to existing and planned Daly City bicycle routes to local destinations such as Serramonte Main Branch library, Gellert Park and Serramonte Shopping Center. Transit users have direct access to frequent SamTrans bus service to BART, Skyline College and other city and regional destinations with SamTrans bus stops at the intersection of Serramonte Boulevard and Entry Drive.

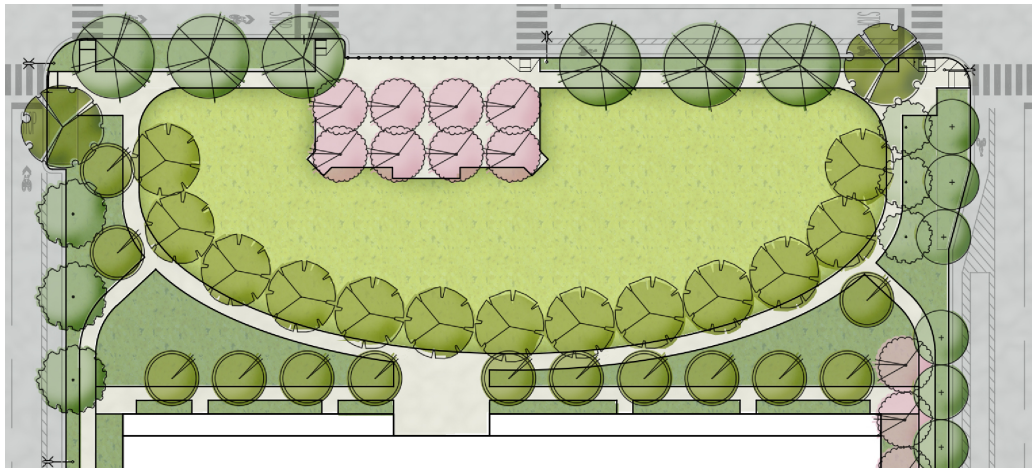
Parking-protected buffered bike lane.

Diversity of Housing. Affordable and market rate rental housing are mixed throughout the site. Parcel A's 122 units of affordable housing for JUHSD Faculty and Staff is approved and constructed, at the corner of Serramonte Boulevard and Entry Drive. Parcel C proposes up to 150[1] units of affordable housing development serving households with low and very low incomes, including the intellectually disabled.

1 The Plan proposes to build a total of 152 units, including 150 affordable units and 2 units that are manager units in two buildings on Parcel C.

Figure 2.1 Illustrative Plan

Neighborhood Parks, Trails and Open Space. The plan features three publicly accessible parks and a loop trail, with walking and biking along the east hillside and walking along the west hillside. The Central Green features a tree-shaded plaza at Entry Drive and a crescent shaped meadow enclosed with oak and evergreen trees. The park is visible and accessible to residents and visitors, with active and contemplative spaces. Overlook Park, in the northeast corner of the Plan Area, is a children-friendly park with community garden, terraced seating, play, and turf areas for family use. Overlook Park will have filtered views through hillside trees of Daly City, San Bruno Mountain, and the San Francisco Bay. South Point Park, at the southern entrance to the plan area, provides a passive recreational landscape and trail linking the western and eastern hillsides together.



The Central Green will have a variety of spaces from active to contemplative.

Urban Parking. Parking for residential and retail uses is "right-sized" based on actual demand. Parking is in secure garages and screened from view from neighborhood streets by building frontages or landscape. On-street parking on private streets and accessways serves residents, retail customers, visitors and neighborhood public spaces. Curbside pick-up and drop-off for Head Start is located along South Access Way.

Together, these features shape a walkable, bikeable, safe, family-friendly neighborhood with a shopping street, parks, and nature trails, with several venues for outdoor gatherings and recreational activities. Development will be built out over time and may not match the illustrative plan precisely.

B. PLAN GOALS

The following goals shaped the master plan and are to guide development in the Plan Area:

B.1 Create an Active Neighborhood

Redevelop the existing underutilized site into a family-friendly, cohesive neighborhood with activities that all ages can enjoy, from cafes and retail to recreational trails and parks that can accommodate a range of play and other activities.

B.2 Promote Housing Equity

Address the housing shortage in Daly City by exceeding the number of units and depth of affordability required by the City's below market rate (BMR) rental housing requirement. The Precise Plan proposes 150 units of affordable housing, exceeding the required affordability levels and the 112 required below market rate units. The balance of units will be market rate rental housing on parcels B, D, E and F.

Residential buildings with nearby parks create a family-friendly neighborhood.

Walkable tree-lined streets will enhance the neighborhood.

B.3 Preserve Head Start

Provide a place to relocate the existing Head Start facility currently on the site, to ensure a long-term home on-site for the preschool. Accommodate Head Start's program needs for a facility with two classrooms, outdoor play areas, and parking. The District is committed to supporting Head Start's effort to fundraise for the buildout of their new facilities.

B.4 Provide Innovative Housing Design

Drawing upon successful projects elsewhere in San Mateo County, accommodate different "types" of buildings, varying in efficiency, parking configuration, ground floor activity and construction technology. Wrap housing around courtyards for efficiency and livability to create attractive urban living.

B.5 Promote Sustainability

Ensure a green and healthy environment for families and our community by planning for green buildings with sustainable, energy efficient and resource conserving operations and performance. Design and construct buildings to reduce our carbon footprint and ensure healthy indoor air quality. Buildings will have roof top solar panels, electric vehicle charging stations, water conservation, waste management, alternative transportation options and green materials that meet or exceed state and local green building requirements. Landscapes will feature storm water treatment gardens, drought tolerant landscapes, street trees to reduce heat island effects, and pedestrian-oriented design.

The Head Start facility will provide dedicated outdoor activity space.

B.6 Fit Hillside Context

Buildings are located in a hillside setting with existing mature trees and supplemental tree planting that will screen views from Serramonte Boulevard and Callan Boulevard. Residential towers are set back from Serramonte Boulevard and oriented east-west to reduce visual prominence for uphill neighbors.

B.7 Provide Active Transportation

Design for active transportation and healthy living. The Precise Plan's streets[2] are designed for daily exercise as walkable and bikeable streets. These "complete streets" advance Daly City's Vision Zero program to reduce pedestrian traffic fatalities to zero.

B.8 Right-size Parking

"Right-size" the supply of parking in relation to parking demand, based on best planning and engineering practices used in places similar to Daly City. Parking can be provided on-site for residents, guests, and retail customers to avoid "overflow" parking in nearby neighborhoods. Use Transportation Demand Management (TDM) strategies to ensure adequate parking for all users.

2 See Development Agreement for off-site improvements, including pedestrian and bike improvements to the Serramonte Boulevard and Highway 1 ramps intersection.

Before view from intersection of Callan Boulevard and Serramonte Boulevard.

After view with trees shown transparent to show new development.

The open space network will include a recreational trail.

B.9 Connect to Nature

Provide diverse, accessible neighborhood park and open spaces for residents and visitors to connect to nature. Create recreational trails open to the public, as well as a series of private and common open spaces available to residents.

B.10 Ensure Long-term Financial Stability for the School District

Plan, design, construct and maintain residential development, park spaces and infrastructure for long-term lease revenues to ensure financial stability of the District.

3. Objective Development Standards

This chapter establishes development standards for the Plan Area. All development planned within the Plan Area will be required to adhere to standards contained in this chapter. Definitions of terms are located at the end of this chapter.

A. LAND USE AND URBAN DESIGN

This section establishes the land use and urban design requirements for the Precise Plan Area. These include comprised of parcelization, land use, development capacity and urban design requirements for building heights, street frontages, ground floor uses and setbacks.

Land Use

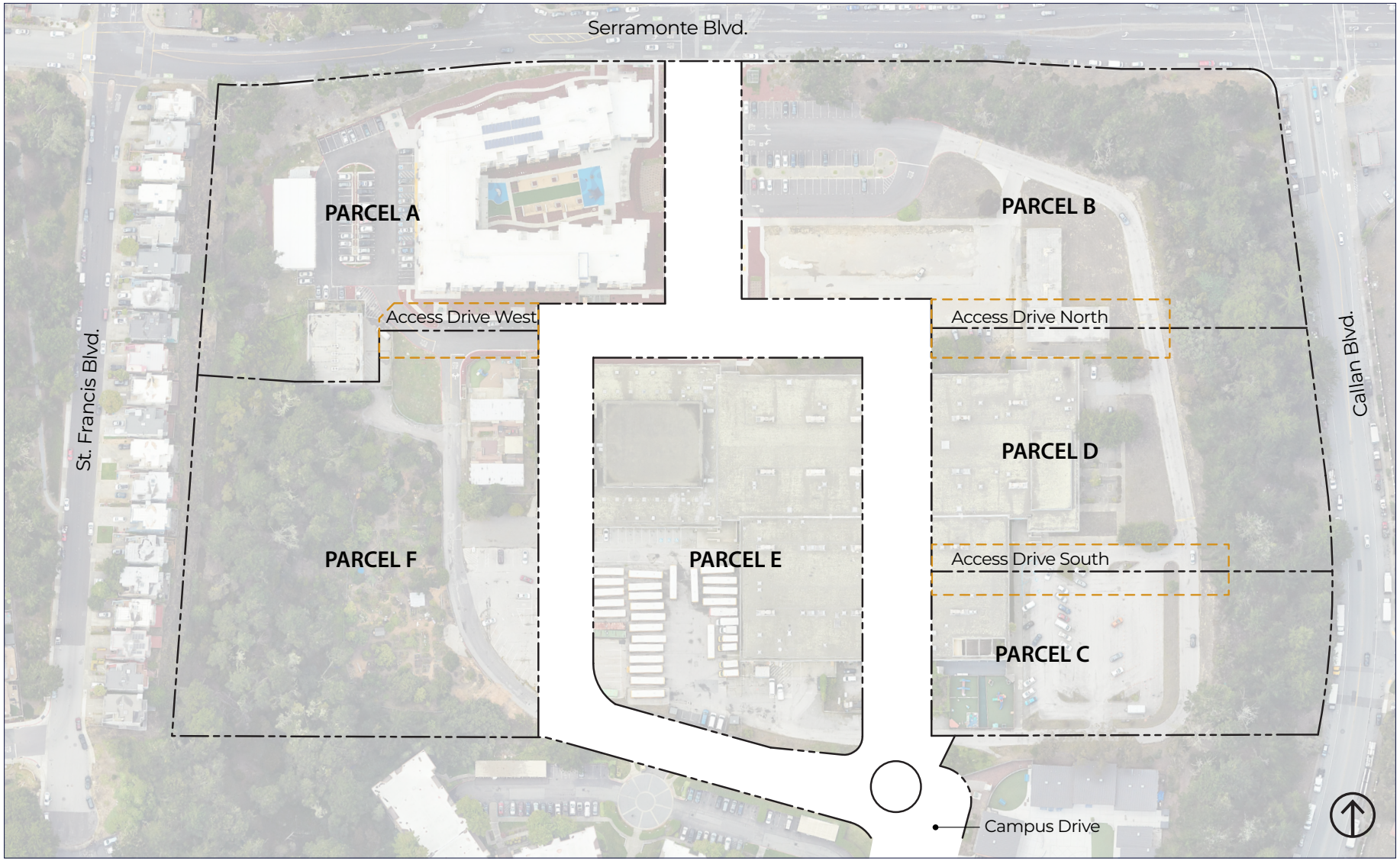
Parcelization

The 22-acre Precise Plan Area is subdivided into six development parcels A through F organized by a street grid into six blocks, per Figure 3.1 Parcelization Plan. In addition to the development parcels, streets are either separate parcels or public access easements as follows:

- Access Drive West between Parcel A and Parcel F
- Access Drive North between Parcel B and Parcel D
- Access Drive South between Parcel C and Parcel D

Parcels can be further subdivided to create lots so long as uses remain consistent with the land use requirements of the Precise Plan and the provisions of the 2023 Daly City subdivision ordinance.

Figure 3.1 Parcelization Plan



Land Use

The General Plan land use designation for the Precise Plan Area is Commercial - Mixed Use (C-MU) as shown in Figure 3.2 Precise Plan Land Use. The following land uses table establishes permitted land uses within the Precise Plan Area. Permitted uses are marked with a P; uses requiring a Use Permit are marked with a UP, blanks indicate uses not permitted in that district.

Table 3.1 - Permitted Land Uses

Table Of Land Uses	Mixed Use District
Residential Uses	
Townhouses	**P**
Multiple-family dwellings	**P**
Live work dwelling units[1]	**P**
Day care center	**P**
Commercial Uses[2,3,4]	
Animal grooming not involving overnight boarding; Athletic clubs and health studios; Assembly uses, including churches, lodges, and social and meeting halls; Business and trade schools; Childcare facilities and play gyms; Movie theaters and complexes; Offices uses, including professional offices, medical and dental offices, and medical clinics; Personal service uses, including nail and hair salons, massage businesses where employees are licensed by the State of California; Restaurants that do not provide a drive-through window; Retail uses, including alcohol sales, not specified as requiring a use permit; and Seasonal temporary uses (e.g., Christmas tree lots).	**P**

1 Live-work units combine residential and non-residential uses. Live-work units require business owner occupancy of the unit and no less than 50 percent of the floor area is workspace. Live-above is permitted, where residential living space is above the workspace, including a separation between the two uses, so that the commercial section can be independently leased out for limited use. Occupants of a live-work unit are required to maintain either a Daly City business license, or a Home Occupation Permit per City code requirements, and as permitted by San Mateo County, such as a microenterprise home kitchen operation. Live-work uses are not included in retail/commercial floor area limits.

2 Other commercial uses not listed here can be permitted at discretion of the Planning Manager.

3 When a use is not specifically listed, it shall be assumed that when the unlisted use is similar to or less objectionable than a permitted use, such use shall be permitted in the district to the same requirements of the most similarly listed use. Otherwise, the use shall be presumed to be not allowed.

4 Small theaters are 99 seats or less, non-profit run, experimental places to develop artists.

(Table Continued)

Table 3.1 - Permitted Land Uses	
Table Of Land Uses	**Mixed Use District**
Animal hospitals and kennels; Businesses whose principal use is for the operation of amusement devices, i.e., arcades; Emergency medical care, including urgent care clinics and hospitals; Food sales on temporary basis, including farmers markets and food truck sales; Hotels, including extended stay hotels; Retailers where more than 50 percent of the store stock retail value is products containing tobacco, electronic cigarettes, personal vaporizers, or electronic nicotine delivery systems; Vehicle or equipment rental; Vehicle storage.	**UP**
Community Service Uses	
Community center, library (as part of a mixed-use building)	**P**
Public Utility and Public Service Uses	
Pumping stations, public utility buildings and uses	**P**
Wireless communications facilities in accordance with the regulations specified in Chapter 17.39 of the Municipal Ordinance	**P**

Note: The following uses are not allowed.

Retailers where more than 10 percent of the store stock retail value is products that are firearms, such as handguns and long guns, to individuals in an open shopping format, or firearm parts, or any business that engages in the repair of firearms and/or firearm parts; Car wash and detailing shops; Manufacturing uses; Outdoor retail sales; Restaurants providing a drive-through window; Service stations, including operational and physical expansions thereto.

Figure 3.2 Precise Plan Land Uses

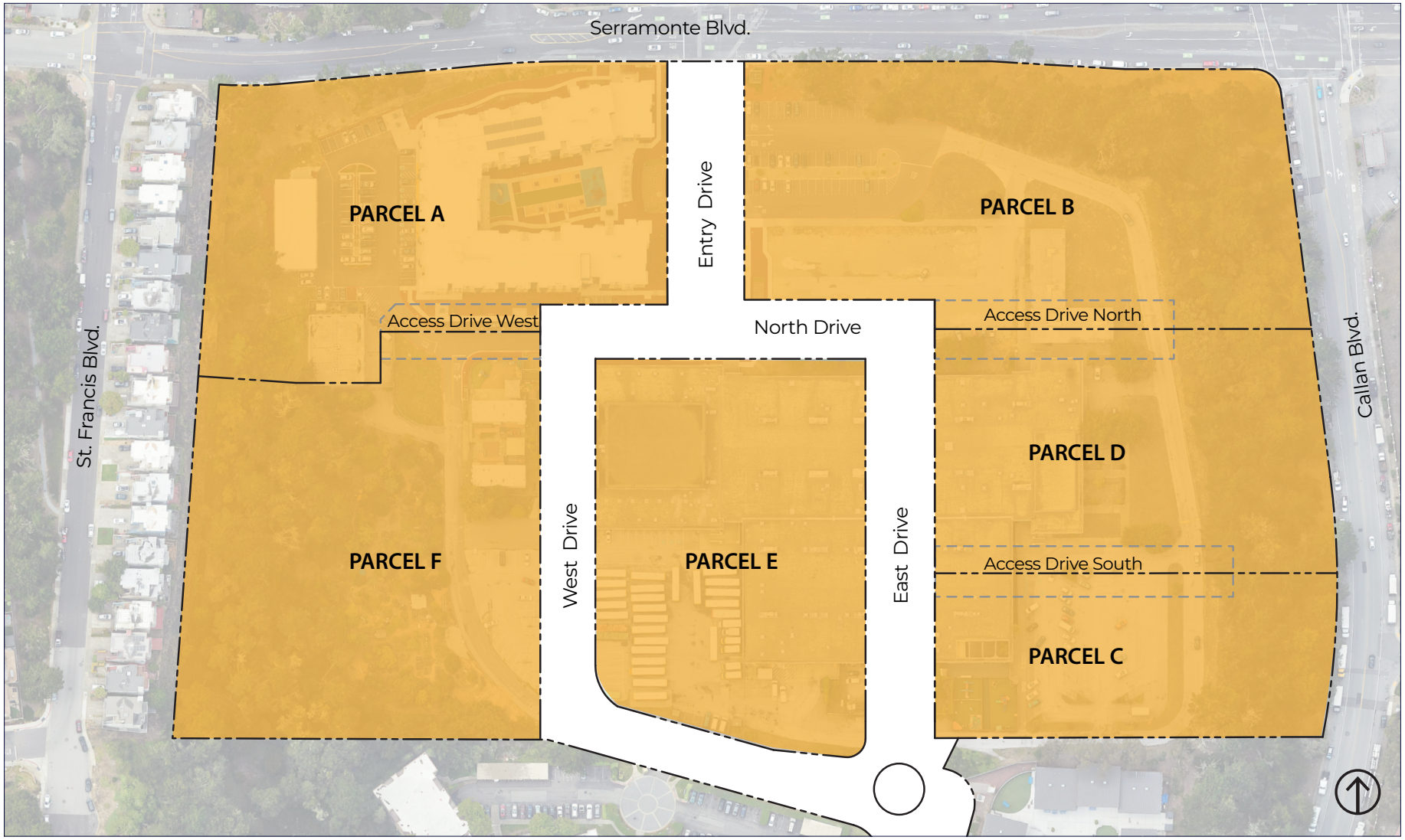


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Table 3.2 - Anticipated Development

Parcels	Area (Acres)	Housing Units	Density	Retail / Commercial	Other
Parcel B	4.26	201	47 DU/Acre	6,000 sq.ft.	
Parcel C	1.93	152	79 DU/Acre	**	2,800 sq.ft. (relocated Head Start facility)
Parcel D	2.83	188*	66 DU/Acre	**	
Parcel E	2.99	290*	97 DU/Acre	**	
Parcel F	3.99	282*	71 DU/Acre	**	
Total New Development	**15.87**	**1,113**	**70 DU/Acre**	**14,000 sq. ft.**	
Parcel A (existing, not counted as new development)	3.68	122	33 DU/Acre		1000 sq.ft. (existing Comcast facility)
Street Parcels within Plan Area***	2.48				
Total Development	**22.16**	**1,235**		**14,000 sq.ft.**	**3,800 sq.ft.**

(*) Denotes parcels with high-rise building potential (up to 14 stories). Only two of these three parcels may be developed with high-rise buildings. This table includes an assumption that Parcel D and Parcel F will be developed with high-rise residential buildings, but during implementation the high-rise location may be transferred to Parcel E from either Parcel D or F. In any case the overall buildout of the Plan Area is limited to 1,235 residential units.

(**) Denotes parcels that may provide retail/commercial square footage on the ground floor in addition to 8,000 sq.ft. assumed for Parcel B. Each of these parcels may or may not build commercial square footage on the ground floor; in any case the total retail/commercial square footage for the overall buildout of the Plan Area is limited to 14,000 sq.ft.

(***) Does not include the 2.59 acres of "Lot 3" on the Tentative Map, comprised of West Drive south of Parcel E, the roundabout and Campus Drive south to Hickey Boulevard.

Development Density

The following table summarizes the anticipated development densities in dwelling units and square feet of floor area at build-out for each parcel within the Plan Area. These numbers may be less than the total capacity of each site.

Table 3.3 - Development Maximum Per Parcel

Parcel Number	Maximum Residential Units Allowed Per Parcel*	Maximum Retail/ Commercial Square Footage Per Parcel**
Parcel A	122	0
Parcel B	210	6,000 sq.ft.
Parcel C	152	8,000 sq.ft.***
Parcel D	270	8,000 sq.ft.
Parcel E	330	8,000 sq.ft.
Parcel F	400	8,000 sq.ft.

*The total number of units may not be realized on every parcel. As noted in Chapter Two, Urban Design Framework, the total buildout of the Plan Area is limited to 1,235 residential units.

** The total square footage of retail/commercial may not be realized on every parcel. As noted in Chapter Two, Urban Design Framework, the total buildout of the Plan Area is limited to 14,000 sq.ft. of retail/commercial space. There is no restriction on the amount of Amenity Space (to be used primarily by residents) per parcel.

***Parcel C is permitted to build up to 2,400 sq. ft of daycare center facilities within its allotment of retail/commercial square footage.

Urban Design

Building Height

Permitted building height for the Plan Area is shown in Figure 3.3 Building Heights. For Parcels D, E and F, the height limit for a podium is up to 87 feet, and the height limit for a tower is up to 150 feet. Buildings can be any height up to these limits. Stepbacks are required at 65 feet in height, with locations as shown on Figure 3.3 Building Heights. Exceptions to the height limit are:

A.1.1 Ornamental architectural features, such as turrets, parapets, corner towers, or other accentuating features.

A.1.2 Mechanical and roof-mounted elevator core equipment up to a maximum of 18 feet above maximum height, provided their combined coverage does not exceed 30% of building roof area. Equipment less than 4 feet above maximum height is exempt from the coverage calculation.

A.1.3 Architectural and landscape screening designed to conceal mechanical and roof mounted equipment.

A.1.4 Sustainability elements, such as photovoltaic cells, small-scale wind turbines suitable for residential development, storm water catchment / treatment equipment, solar water heating equipment.

A.1.5 Enclosed amenity spaces to a height of 12 ft where roof is designed as an accessible outdoor common area if coverage of enclosed amenity space is no more than 20% of building roof area.

Street Frontage

The Precise Plan utilizes build-to lines to define urban street and park frontages for buildings. Figure 3.4 Street Frontages indicates the location and percentage of building walls required to be located at a build-to line. A build-to line sets the location of the primary building wall. Table 3.4 Location of Build-to Line for Parcels specifies the distance in feet of the build-to line from a parcel boundary. Together, these standards set the location and street wall for buildings throughout the neighborhood.

Building frontage standards are:

A.2.1 The building frontage on all parcels shall comply with the percentage of building that is required to be aligned along the build-to-line, as shown in Figure 3.4.

A.2.2 The primary wall of a building shall align with the build-to line. The primary wall can be located up to 6 feet from a build-to-line. Ground floor building frontages may be recessed from the build-to line.

Figure 3.3 Building Heights

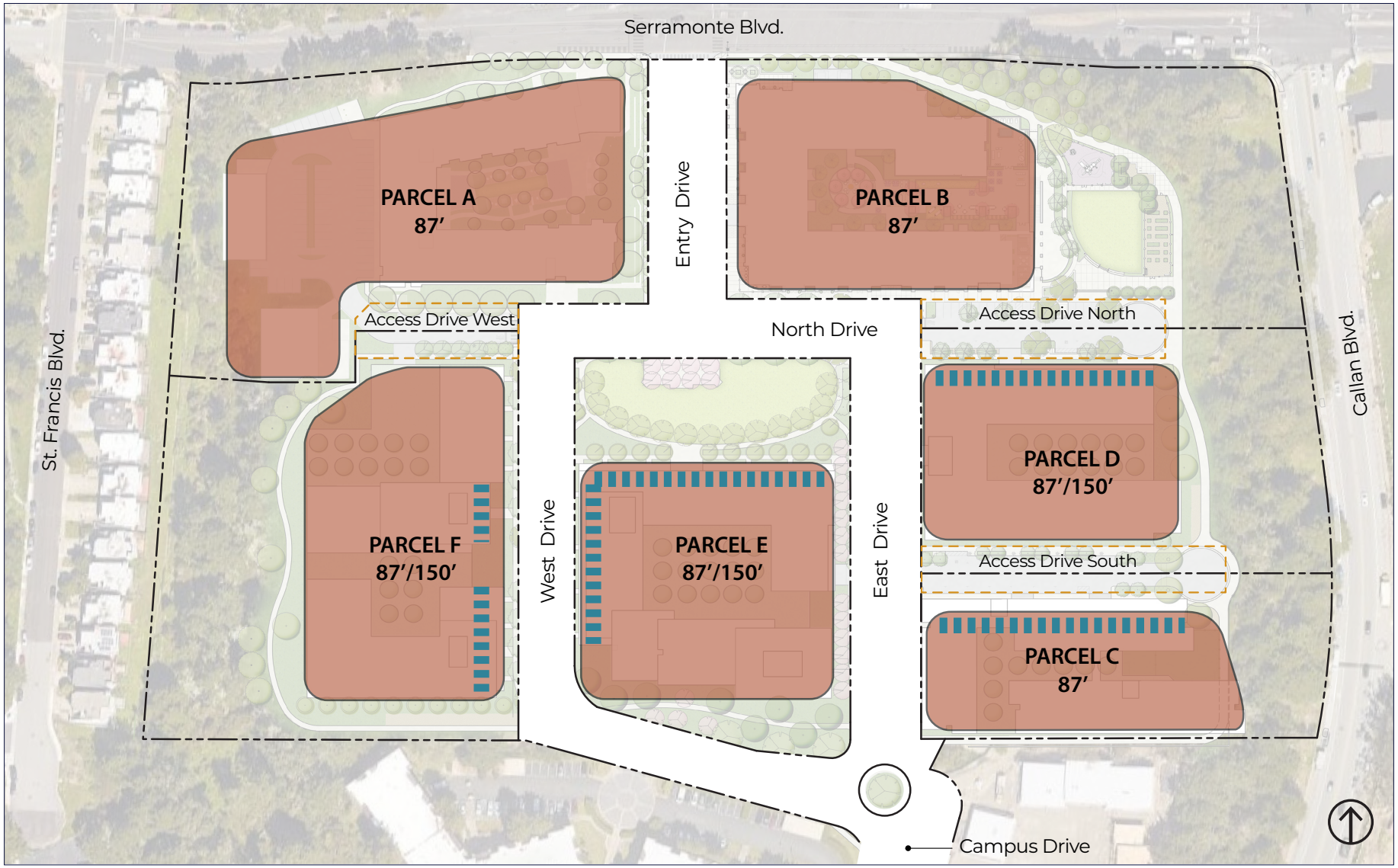


Figure 3.4 Street Frontage

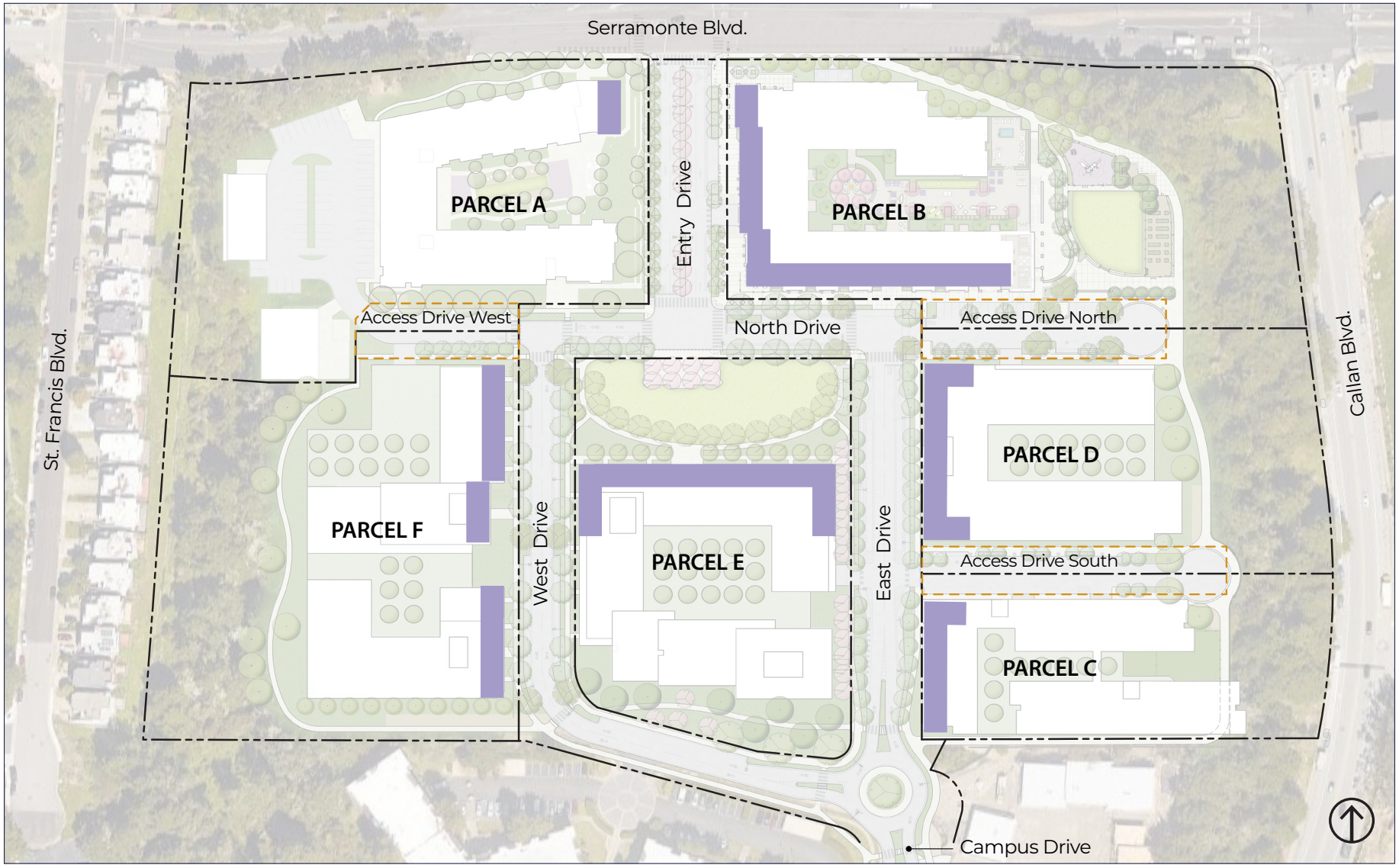


Table 3.4 - Location of build-to-line for Parcels		
Parcel	**Frontage**	**Build-to Line**
Parcel A	Entry Drive	N/A
	Access Drive West	N/A
Parcel B	Entry Drive	Varies from 7.5 feet to 28 feet from north to south
	North Drive/Access Drive North	43 feet
Parcel C	East Drive	2 feet
	Access Drive South	25 feet 9 inches
Parcel D	East Drive	6 feet
	Access Drive North	40 feet
	Access Drive South	40 feet
Parcel E	East Drive	14 feet
	West Drive	10 feet
	West Drive (southside)	15 feet (setback measured from Public Access Easement)
	Central Green	10 feet (setback measured from Public Access Easement)
Parcel F	West Drive	10 feet
	Access Drive West	40 feet

Example of Residential Active Use.

Example of Residential Unit Entries at Ground Floor.

A.2.3 Balconies and other projections above 16' from ground level may encroach across the build-to line up to 6 feet.

A.2.4 Building entry canopies, arcades, and galleries with a height no greater than 16 feet may encroach up to 15 feet across the build-to-line.

A.2.5 Stairs to podium level courtyards overlooking parks, stoops, and appropriate fencing can encroach up to 10' on the park side of a build-to line.

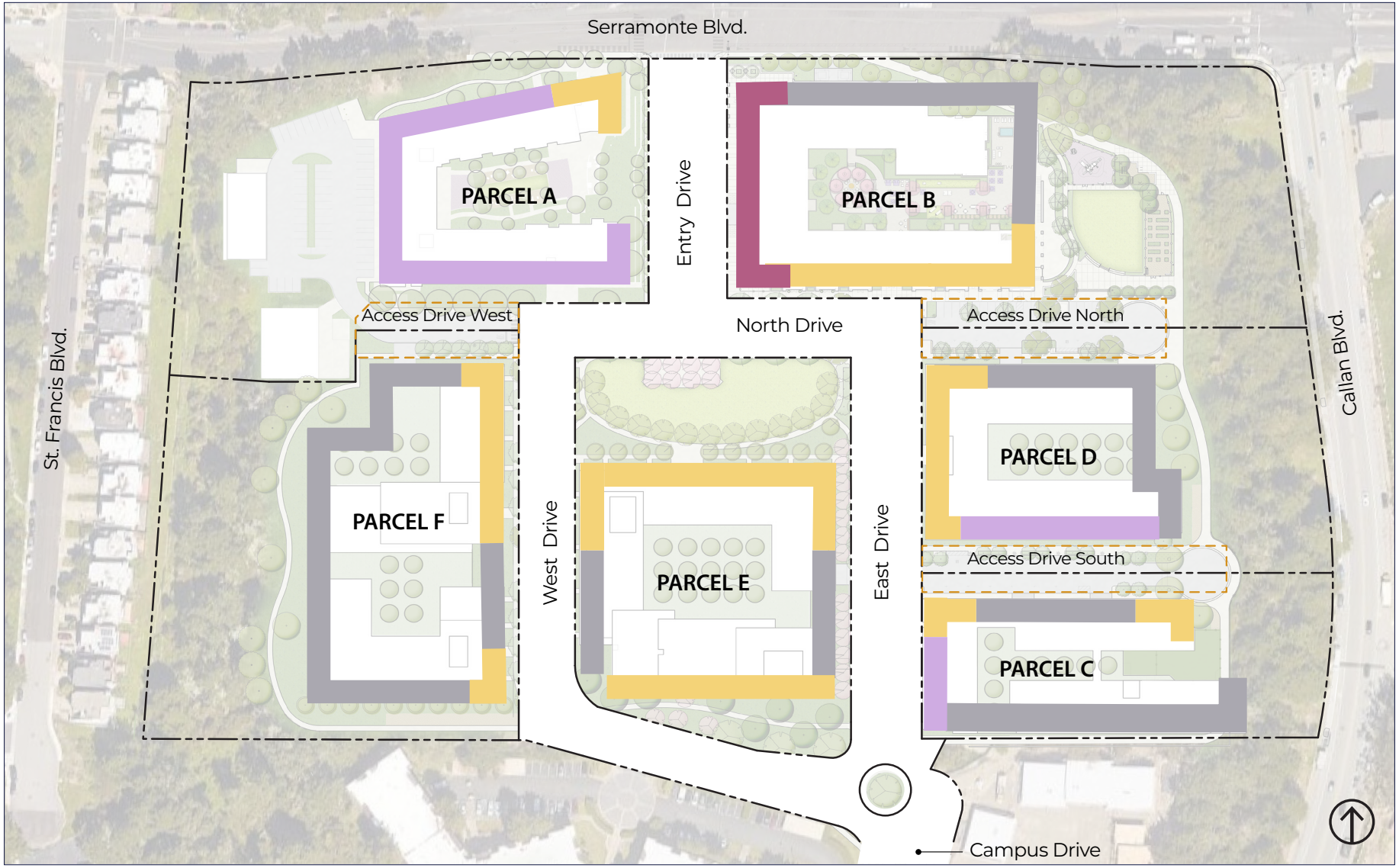
Ground Floor Use

The distribution of ground floor uses is essential to creating an active pedestrian environment. Figure 3.5 Ground Floor Use identifies the location, type and orientation of ground floor uses by parcel for the Plan Area. Five types of ground floor uses are defined as follows:

1. **Mixed- Use**. This requires retail, café, and restaurant uses with outdoor dining, building entries, residential lobbies, commercial or community uses that attract pedestrian activity with physical and visual access to and from the adjacent sidewalk.

2. **Active Residential Use**. Ground floors shall have one or more of the following: commercial or community uses; main building entry, residential lobby, residential amenity spaces, and individual ground floor residential unit entrances. Ground floor residential unit entrances

Figure 3.5 Ground Floor Use



Notes:
1. All buildings on Parcels B, C, D, and F are required to provide direct access to adjacent hillside open space from ground foor level and/or podium level.
2. One parking structure is permitted on Parcel F. If a parking structure is provided, the ground foor uses on West Drive shown in this diagram are not required if the parking structure frontage provides ground foor uses such as bicycle parking, bike share stations, information kiosks for transportation options or other active uses.

Example of Active Use.

shall be accessible units at grade or elevated ground floor units with transitional space such as a stoop or porch not greater than five feet in height above grade.

3. **Residential Use**. This requires ground floor residential use, such as residential units without individual unit entries accessible from the street (which can have a back porch, garden, or patio), or other residential use, and excludes parking, loading and services areas.

4. **Parking, Loading and Service Use**. The location for parking, loading and service uses fronting streets, yards and accessways which are not permitted elsewhere.

Where Mixed-Use, Active Residential Use, and Residential Use frontages are required:

A.3.1 No more than one 24' wide vehicle access driveway or two 12' wide vehicle access driveways are permitted. Loading docks are not permitted at active ground floor use frontages.

A.3.2 Blank walls or walls opening to structured parking areas at the ground floor are limited to 30' maximum.

Setbacks

The perimeter of the Plan Area should have the following setbacks along neighboring properties or street right-of-way. These are minimum setback dimensions. For build-to lines, see Table 3.5.

Table 3.5 - Setbacks

Location	Setback
North Perimeter Property Line	20 feet from Serramonte Boulevard
East Perimeter Property Line	75 feet from Callan Boulevard
South Perimeter Property Line	Parcel C: 7.5 feet Parcel F: 40 feet
West Perimeter Property Line	30 feet
Within a parcel	Minimum separation between buildings shall comply with local and state building codes.

B. ARCHITECTURAL DESIGN

Buildings conforming to the architectural design standards will visually and functionally fit and contribute to the pedestrian-oriented urban realm of the Plan Area. Architectural design standards define the architectural character, form and function of buildings including building massing, façade composition, architectural details, materials, color, and sustainability features.

Architectural Character

Architectural character is the appearance of a building created by its form, function, construction technology and visual features.

B.1.1 Buildings shall be of high quality, contemporary architectural design. Contemporary architectural design is 21st century design: it reflects current trends in architecture. Contemporary architectural design does not adhere to a particular style of set of standards; rather, it seeks to distinguish itself from the past by incorporating the latest innovations in building technology and design.

B.1.2 Buildings shall not directly reference historic architectural styles or use materials associated with specific periods or styles.

B.1.3 Avoid the use of terracotta tile roofing, mansard roofs, asphalt roof tiles or shingles.

B.1.4 Avoid ribbon windows and flat building facades.

B.1.5 Avoid auto-oriented ground floor building design, such as continuous, open to the street, at grade covered parking spaces and extended curb cuts.

Proportion

Proportion is the correspondence of the size of building elements to human scale, to each other and to the whole building, thus creating a balanced, harmonious composition of elements that achieve a visually coherent architectural aesthetic related to scale of human experience.

B.1.6 The size of the pedestrian, podium and tower levels shall be in proportion to one another.

B.1.7 Avoid visual discord due to the mixing of too many differently shaped and sized building elements, forms, colors, or textures.

B.1.8 Avoid random, oversized building elements.

Building Massing

Building massing is the three-dimensional configuration of a building's size and shape. Vertically organized massing standards for pedestrian, podium and skyline levels are:

Pedestrian Level

B.2.1 To create a pedestrian level setback for active uses with occupied floor above, pedestrian level façade setbacks from the build-to-line shall not exceed 10 feet.

B.2.2 Where Active Uses or Required Building Entry, Lobby or Residential Amenity Space uses are required, the minimum floor-to-floor height for the ground floor is 16 feet.

Tall ground floor level provides differentiation from floors above.

Podium Level

Podium level building massing shapes the spatial definition of the public realm. Building street walls up to 87 feet are considered the podium level.

B.2.3 The first one to three levels of all buildings shall be differentiated from the upper floors to provide a visual support for the floors above. They shall have high quality materials appropriate for a pedestrian environment.

B.2.4 Stepbacks are required as shown on Figure 3.3, Building Heights. Where required, stepbacks shall be no higher than 65 feet above grade with the building set back no less than six feet from the street wall.

Tower Level

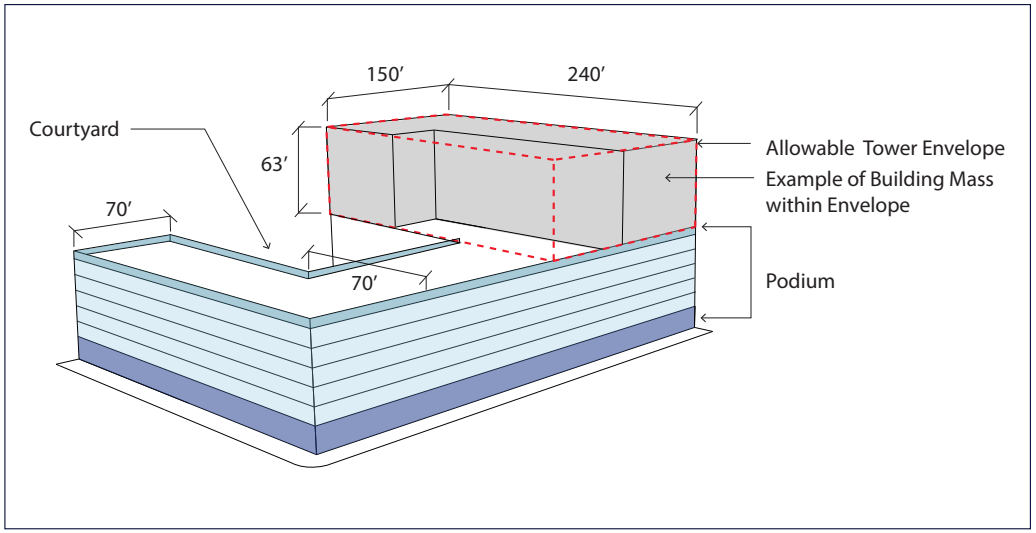
The tower, or skyline level consists of all building levels above 87 feet from grade. The skyline level contributes to the visual identity of the Plan Area.

B.2.5 Tower massing to extend to ground level to visually anchor the tower to the ground.

B.2.6 Towers extending to ground shall be set back 10 feet minimum from the build-to line.

B.2.7 Towers shall be oriented in an east-west direction to minimize impacts to views from residences along Saint Francis Boulevard.

Figure 3.6 Podium Level and Skyline Level Massing

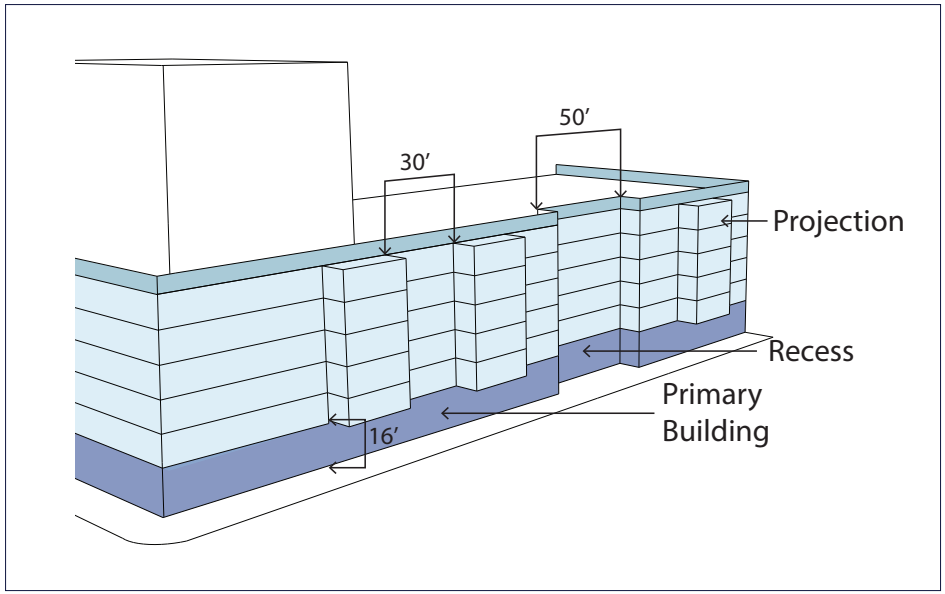


B.2.8 Each tower shall not exceed a massing envelope of 240 feet long by 150 feet wide.

B.2.9 A minimum separation of 60 feet is required between any two towers or portions of skyline level building massing.

B.2.10 Towers are not permitted adjacent to the central open space.

Figure 3.7 Façade Modulation



Façade modulation provided by vertical shifts and balconies.

Façade Composition

Façade composition is the organization of horizontal massing of the overall shape of a building to be relation to human scale experience.

Façade Modulation

B.3.1 Long continuous facades that extend the length of a parcel or city block are to be avoided. Buildings over 100 feet in width require vertical breaks in building massing in the form of projections and recesses to reduce the overall scale of the building.

B.3.2 Occupiable projections, such as balconies or bay windows, are permitted to project up to six feet from building face above streets and open spaces above the pedestrian level. The recess or projection shall be a minimum of 3 feet in depth.

B.3.3 The façade shall be divided into segments of 30 to 50 feet in width using one or more of the design approaches below:

- Vertical shifts
- Balconies or bay windows
- Corner expression
- Volumetric recesses (including balconies)
- Volumetric projections

- Change of Material: to achieve modulation by a change of material, the material change must occur for at least 20% of the façade and must change in plane at least 18 inches in depth from the facade.

Fenestration

Fenestration is the arrangement of the location, grouping and scale of windows and doors as part of the wall system that comprises the façade of a building.

B.3.4 Building fenestration shall incorporate recessed and/or projecting window bays, balconies, canopies, and architectural elements, contrasting surfaces, and/or a rhythm to the building's light and shadow.

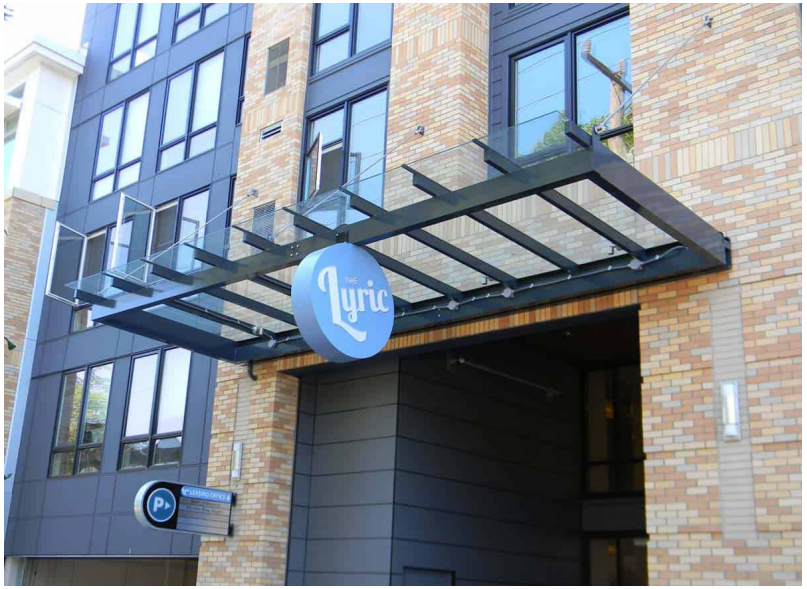
B.3.5 Avoid featureless expanses of fenestration that eliminate a sense of human scale.

Blank Facades

A blank façade is a building wall without any windows or doors, and is a featureless expanse with no variation in plane in terms of horizontal and vertical projections, openings or change in materials.

B.3.6 Blank facades are to be avoided at building walls facing public spaces or streets.

B.3.7 At the ground floor, blank facades longer than 50 feet should provide landscaping or public art.



Building lobby with canopy to give the entry prominence.

Building showing facade modulation, including vertical shifts and corner expression.

Ground Floor Design

B.3.8 Transparent windows, storefronts, show windows, building entries, dwelling entries, and/or other active uses shall be placed along street and public open space frontages, as required in the Ground Floor Active Frontage standards.

B.3.9 Doors or sliding windows shall be used by ground-floor restaurants, eating and beverage services to enable outdoor dining along sidewalks and plazas.

Windows and Doors

The selection, design and proportion of windows and doors highly influence the appearance of a building.

Entries

B.4.1 Buildings shall have identifiable main entrances that are directly visible and accessible from public rights-of-way. An entry canopy, recessed building volume, a sculptural volume, change in scale or identifiable architectural treatments are acceptable features.

B.4.2 In mixed-use buildings, residential entries are to be differentiated from commercial entries.

B.4.3 Pedestrian seating and bicycle parking shall be located near building entrances.

Façade modulation provided by recesses and projections of architectural elements.

Windows

B.4.4 Upper story windows shall have architectural details, such as sills, or lintels, that recess or project from the facade.

B.4.5 Reflective glazing is not permitted.

B.4.6 Non-reflective coatings, low-emissivity glass, external shade devices and other elements shall be used.

Materials and Color

Materials and color play a powerful role in creating the visual experience of a building. For the exterior of buildings:

B.5.1 Building materials, colors and finishes shall be coordinated to create a visually harmonious color palette appropriate for a family-oriented residential neighborhood, consistent with contemporary building design.

B. 5.2 High quality building materials and architectural detailing, with a preference for natural materials at the ground level, shall be used where people directly experience buildings.

B.5.3 Changes in color, texture or materials shall be used to differentiate architectural elements and building massing.

B.5.4 Avoid monolithic use of color, where an entire building is one color or tone.

B.5.5 Avoid garish, or discordant use of color.

C. PARKING AND LOADING

Parking Ratios

C.1.1 All parking standards that differ from the Daly City municipal code are designed and necessary to maintain the unity or livability of the Project.

C.1.2 Per AB-2097, cities can no longer impose minimum parking requirements on new developments within a half-mile of major public transit stops, for which Serramonte Del Rey qualifies. The bill does not prevent property owners from building parking and JUHSD anticipates building the appropriate amount of parking, at their discretion.

C.1.3 The following parking ratios currently anticipated for Parcels B through F:

- Parking ratios are based on current conditions and assumptions. The City and JUHSD acknowledge that future parking demand will be in considerable flux over the lifetime of the Development Agreement, and may increase or decrease significantly. The intent of this approach is to provide adequate parking within the Precise Plan area based on demand as determined by a parking analysis study provided at the Applicant's discretion that will be based on objective analysis, and to minimize parking impacts to on-street parking in the surrounding neighborhood.

- The parking ratio assumed for market rate housing is approximately 1.5 spaces per dwelling unit[5].
- By way of example, at Parcel C, the parking ratio for the affordable housing is the state affordable housing standard at time of City Council adoption of at least 0.5 parking space per dwelling unit for projects located within ½ mile of a major transit stop. Development of Parcel C may provide parking at a parking ratio up to 1.5 spaces/unit, To the extent parking is provided, the parking ratio will be included in the documents submitted to the City for review and approval of Parcel C.

C.1.4 Parking for pick-up and drop-off for the Head Start Program at Parcel C may be accommodated by on-street parking marked by appropriate signage, with such signage reserving parking spaces for this use during the appropriate hours. Parking for Head Start Program staff can be accommodated with reserved on-street parking designated by appropriate signage.

C.1.5 Overflow parking for Parcel A may be accommodated within the Plan Area with surface parking, on-street parking, or within future parking podiums or structures on Parcels B through F. To the extent that JUHSD demonstrates that overflow parking is not needed for a particular development, it will be eliminated as a requirement in the future.

C.1.6 Residential parking can be accommodated in mechanical puzzle lifts.

C.1.7 No more that 10% of residential parking can be tandem, and tandem spaces may only be assigned to users of the same dwelling unit. Tandem units may be designed as either front to rear spaces or mechanical lift spaces (stackers).

C.1.8 Parking Enforcement: JUHSD or a delegee will be responsible for enforcement of any parking rules on JUHSD property. If private parking restrictions for on-street parking are put in place, parking spaces available for public use will be designated to access publicly accessible parkland, trails, and open space during time periods of private parking restrictions.

C.1.9 One bicycle parking stall per unit shall be provided and accessible from street level. Bicycle parking in excess of one stall per unit can be located anywhere on site.

Design of Off-Street Parking and Loading

C.2.1 Parking shall be located behind, within, or under buildings, or within separate structures. Surface parking areas are prohibited between a building and Entry Drive, North Drive, East Drive and West Drive street frontages.

5 This may vary, based on AB-2097, see C.1.3. By way of example, the Applicant plans for 302 residential parking spaces for the 201 dwelling units for Parcel B.

C.2.2 Parking stall and drive aisle dimensions for each parcel may comply with either approach 1 or 2 below, or a combination of both approaches:

C.2.2.1 The current City standards for off-street parking (including the ratio of standard spaces to compact spaces) at the time of the Applicant's submittal for conformance review, and/or

C.2.2.2 A "Uni-stall" standard size parking space which is based upon a stall dimension of 8'–6" x 18'–0", unless constrained by a wall on one or both sides, in which case the minimum stall width will be 9'–0" minimum. The drive aisle shall maintain a minimum of 24' clear.

C.2.3 For mixed-use projects, shared parking is encouraged to allow uses with different peak hours of operation to utilize off-street parking facilities of other buildings in the Precise Plan.

C.2.4 Loading docks and service areas shall be located at the rear of the development or inside parking structures for parcels deeper than 80 feet, separate from parking areas. For smaller parcels, loading docks and service areas must be located on the side street, wherever possible. Loading zones should not disrupt the flow of traffic within a given project area.

C.2.5 Loading docks shall be located on Access Drives North, South, and West. If this is not possible, loading docks may be provided on East, North or West Drive, if enclosed within a building.

Vehicle and Bicycle Access

C.3.1 Location of vehicular parking entrances shall be as follows:

- Parcel A shall be accessed from Access Drive West.
- Parcel B shall be accessed from Serramonte Blvd, Entry Drive or Access Drive North; or any combination of these.
- Parcel C shall be accessed from East Drive or Access Drive South, or any combination of these.
- Parcel D shall be accessed from East Drive, Access Drive North, Access Drive South; or any combination of these.
- Parcel E shall be accessed from East Drive or West Drive; or any combination of these.
- Parcel F shall be accessed from West Drive or Access Drive West; or any combination of these.

C.3.2 Vehicular entries shall be located a minimum of 100 feet from intersections and crosswalks except for driveways located along access ways.

C.3.3 Bicycle access shall be from street level, and not required through garage entrances. Bicycle storage for each building shall be accessible from ground level, as close to the driveway entry as practicable, and clearly signed. Bicycles in excess of one per unit can be stored anywhere on site.

Vehicle Access Design

C.4.1 Two-way vehicular entrances designed as a single driveway shall have a maximum width of 24'.

C.4.2 Where a driveway crosses a sidewalk, clearly demarcate the sidewalk across the entire width of the driveway by using colored paving or materials.

C.4.3 On-street parking may be provided in the form of parallel parking or angled parking based on the width of the street.

Parking Structure with screening to reduce visual impact.

Parking Structures

Parking for mixed-use and residential buildings can be in underground, partially above-ground, or above-ground garages.

C.5.1 Above-ground garages not screened by residential uses shall include façade treatments or screening.

C.5.2 Parking garages shall be lined with ground floor active uses or residential entries where indicated per street frontage requirements, and designed with building façades that screen structural elements of the garage where not required by street frontage requirements.

C.5.3 The design of entries to parking garages shall not be more prominent on the building façade than the primary pedestrian entry.

C.5.4 Above-ground parking garages shall be designed with human scale design elements that complement and do not contrast with buildings and public spaces of the Precise Plan.

C.5.5 Parcels B, C, D, E, and F may contain above-ground parking garages.

C.5.6 Parking structure lighting shall be designed to avoid direct glare towards adjacent residential buildings.

Bicycle Facilities

C.6.1 Bicycle parking should be in close proximity to building entrances and bicycle routes for user convenience.

C.6.2 Bicycle parking shall accommodate a range of bicycle types, including standard bicycles, E-bikes, tandem bicycles, and trailers.

C.6.3 On-street bicycle parking shall be separated from automobile parking by use of a landscaped buffer or curb.

C.6.4 Off-street bicycle parking shall be in secure locations in each building in the Precise Plan area.

Example of a public open space.

D. OPEN SPACE

Open Space Requirement

Projects within the Plan Area shall provide a minimum of 150 sq. ft. of open space per dwelling unit[6]. The requirement for open space is to be met parcel-by-parcel through a combination of the following:

- Publicly accessible private open space, which are public spaces, such as park, trails, and open space areas, which are publicly accessible to residents, visitors, and public users may have limited hours of availability.
- Private open space such as balconies, patios, or other open spaces for the exclusive use of an individual unit.
- Common area open space such as are communal open spaces or recreational areas with access limited to tenants of a residential or mixed-use development. Examples include at grade open space or plazas, podium level courtyards, rooftop terraces, and similar areas that can provide communal amenities, such as swimming pools, play areas, and cabanas.

6 Per Daly City zoning code section 17.38.020 requirement for 150 sq. ft. of usable open space.

Allocation of open space can be off-site of the specific parcel and within the Plan Area, including the areas designated by easement, such as allocation to Overlook Park, Central Green, South Point Park and the Recreation Trail at parcels B, C and D.

The Recreation Trail, Overlook Park, Central Green, and South Point Park will be counted towards satisfaction of the Open Space requirements for individual parcels as designated by the JUHSD. The allotted Open Space will be assigned to a specific parcel at the time the parcel is submitted for conformance review.

The open space at the Retail Plaza at Entry Drive is allocated to Parcel B exclusively.

Land that does not meet the City's gradient criteria for usable space (e.g., excessive slopes in the Hillside Area) will not be counted toward satisfaction of open space required for any parcel.

Example of common open space with rooftop garden.

Common Open Space

D.1.1 Buildings shall provide spatial enclosure for common open spaces to create privacy, limit views from streets, and wind protection.

D.1.2 Common open space shall be visible and accessible to and from building amenity areas.

Building with balconies as private open space.

Private Open Space

D.2.1 Private open spaces shall be directly accessible from the unit and large enough to permit outdoor activities with a minimum of five feet width and depth.

D.2.2 Private open space shall be constructed with high quality durable materials.

D.2.3 Fencing or screening between ground floor private open spaces shall permit visibility in and out of the open space for the top 18 inches.

E. LANDSCAPE DESIGN

This section establishes landscape standards for park, open space, street, and development site planting.

Hillside Woodlands

To care for the hillside wooded areas to reduce fire hazards, enhance existing vegetation and promote urban forestry, the Precise Plan requires:

E.1.1 A tree succession operations plan for aging mature trees prepared by a qualified arborist will guide the replacement of existing trees over time due to age or fire vulnerability.

E.1.2 Removed trees shall be replaced with a diverse plant ecology governed by the area's unique coastal/Mediterranean climate including evergreen and deciduous species as recommended by an arborist.

E.1.3 The project's wooded hillside perimeter to the west and east shall be cleaned of surface and ladder fuels. Replacement trees shall include evergreen and deciduous species as described in the Project Tree List.

Planting

E.2.1 Plant material shall be comprised of at least 75% drought tolerant plant species. Planting plans shall comply with Daly City's Water Conservation in Landscaping regulations and the Water Use Classification of Landscape Species (WUCOLS).

E.2.2 Where turf grass is used, low water use hybrids and/ or no mow varieties shall be used. A variety of shrubs and ground covers should be used to create layering around building foundations, keeping shrubs at or below windowsills. Plant selections should be such that sightlines remain open and clear, and places of concealment are not fostered. Plants should be used to screen above-ground utilities. Along streets and sidewalks, plants shall be used in planters within the right of way to create spatial separation between sidewalk and vehicular traffic.

E.2.3 Pollinator plants that attract native birds and insects should be used strategically in locations well-suited to attract and sustain native populations. Use of fruiting plant material should occur away from hardscape areas to prevent staining of pavements and to minimize maintenance.

Planters

E.3.1 Landscape planters within the street right of way shall be a minimum of four feet wide.

E.3.2 Tree wells shall be 4'x 4' minimum. Tree grates shall be cast iron with a baked oil finish in plaza areas and be an ADA accessible design consistent with the neighborhood.

E.3.3 Where landscape planting is provided under trees, planters shall be 4'W x 6'L minimum.

E.3.4 Planted medians shall provide at least a five feet wide planting area in addition to a minimum 12 inches wide maintenance band at the back of curb consisting of concrete, pavers, or fixed cobbles.

Site Irrigation

E.4.1 Site Irrigation systems shall comply with all local and state requirements as of time of project approval

E.4.2 All irrigation equipment shall be controlled with weather-based controllers located in easily accessible, locked stainless steel pedestal boxes. The equipment should include flow sensors and automatic shut off valve capability with a wi-fi based alarm system to alert maintenance controller team(s).

E.4.3 Irrigation systems shall provide quick couplers or hose bibbs in lockable wall boxes in all common use areas.

Soil & Drainage

E.5.1 On-grade planting areas shall be comprised of amended topsoil import or amended native soil as required, based on a soil analysis report and soil laboratory recommendations. Excavation, clearing and grubbing, or soil preparation shall occur within established tree protection zones as per the advice of a landscape architect or arborist.

E.5.2 Planting areas shall by dressed with a 3-inch layer of mulch.

E.5.3 Cast iron or similar drain grates shall be used in turf and pedestrian circulation areas. Landscape planters shall be drained with cast iron, decorative metal, plastic or similar flat or atrium-style grates and factory-fabricated bodies.

Site Furnishings

E.6.1 Site furnishings shall be comprised of materials designed to withstand outdoor conditions.

E.6.2 Short term bicycle parking shall be dispersed throughout the Plan Area, as required to meet project requirements, city standards, and bicycle parking standards. Bicycle racks shall be galvanized, vinyl covered, or stainless steel, and meet all City requirements. In ground- or surface-mounted attachment is acceptable.

E.6.3 Seating shall be provided at retail, parks, open spaces, adjacent to the trails, and in front of primary building lobbies. Benches shall be made of metal and/or wood. Where wood is used, it should be thermally modified, or a suitable hardwood built to withstand weather and heavy public usage.

E.6.4 Café tables with chairs shall be movable with a variety of sizes for public use in gathering spaces and shall be constructed of materials suitable for outdoor public usage.

E.6.5 At least one drinking fountain shall be provided at each of the following: Overlook Park, Central Green, and the Recreation Trail. Dog bowl and water bottle filling attachments are recommended but not required.

E.6.6 Within Overlook Park, Applicant shall provide play equipment for children ages two through twelve. All play areas will be designated for children between the ages of two to five and for ages five to twelve years old.

Trees

E.7.1 Trees within the street right of way, in plazas, and high-visibility open space areas should be provided in 24-inch box size or larger and be secured with tree stakes or below-grade root ball guying systems appropriate for the windy conditions found in Daly City. Above-ground cabling guying shall not be used in public spaces. Trees shall be pruned up to 6 feet to 8 feet clear off the ground or as required by ADA or City guidelines.

E.7.2 Individual developments within the Plan Area shall use trees that are provided in minimum 15-gallon size or larger.

E.7.3 Entries at the north and south shall have unique tree plantings.

E.7.4 Seasonal interest shall be created with deciduous trees providing spring flowers and fall color.

E.7.5 Driveway entries, curb cuts, and curb ramps shall be constructed of concrete and shall match sidewalks to provide a consistent look and feel for hardscape along vehicular and pedestrian circulation routes.

E.7.6 Enhanced finishes and/or striping shall be used for crosswalks.

Trail and Paths

E.8.1 Trail surfaces shall be asphalt or concrete, provide for adequate clearances along the edges and overhead, and be suitable for their intended use. Refer to trail sections in Chapter 5 for trail dimensions.

E.8.2 Signage, ornamental landscaping, and trees shall be provided along the trail system to enhance user experience.

Stormwater Management

E.9.1 Project submittals shall comply with the Precise Plan's phased, performance-based approach to stormwater management, consistent with the San Mateo County Municipal Regional Stormwater Permit, and Daly City's municipal code pertaining to stormwater management. Projects shall minimize the amount of paved area. Where feasible, paved areas shall include "green" stormwater collection and treatment, and employ Low Impact Development (LID) features that minimize surface water runoff. LID features may include bioretention systems, swales, green roofs, and permeable pavers.

E.9.2 Stormwater retention features that minimize runoff into streets, parking lots, landscaped areas, and open spaces shall be incorporated, where feasible. Stormwater retention features include drainage swales and rain gardens.

Open Space Landscaping Standards

E.10.1 Landscaping shall define the edges of paths, plazas, and seating areas.

E.10.2 Trees shall be planted to shade walkways, gathering areas, parking, and other larger expanses of pavement.

E.10.3 Landscaping in setback areas shall create a transition zone between the sidewalk and street-level residential units and entries.

E.10.4 Landscaped areas shall be regularly maintained to keep them aesthetically pleasing, and to remove dead and dying plants.

E.10.5 Gateway or entry points shall be emphasized with distinctive trees and plants.

E.10.6 Existing trees, to the extent feasible, and healthy, are to be preserved and integrated into site designs.

E.10.7 To reduce water usage, all development shall employ water-efficient irrigation techniques, including micro–irrigation, drip systems, and weather-based irrigation controllers, instead of conventional sprinklers.

E.10.8 Native, drought-tolerant, or well-adapted tree and plant species shall be used.

E.10.9 Seasonal and year-round flowering shrubs and trees shall be located where they can be most appreciated by site users and passersby, such as adjacent to walks and open space areas, or as frames for building entrances and stairs.

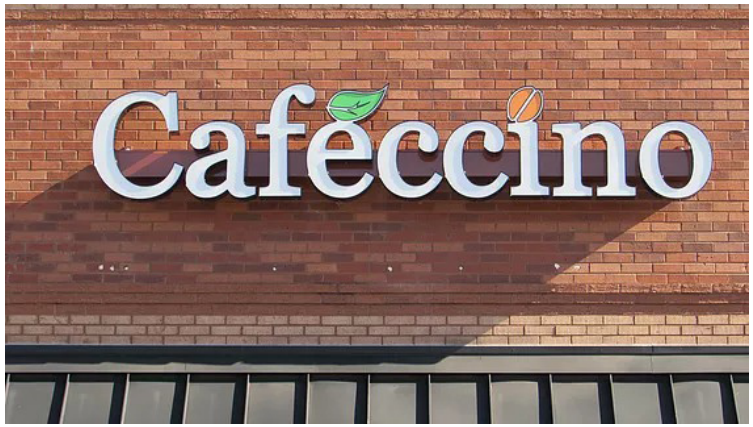
F. SIGNAGE

The following section establishes substantive and procedural standards for signage proposed within the Plan Area, to ensure high quality signage for the Plan Area. Where this section does not set standards, the Applicant and City staff shall use the Daly City Code. City review and approval of wayfinding signage shall be part of Design Review. Signage can be a separate application from conformance review and design review. Where there is a conflict with the Daly City sign ordinance, this Precise Plan governs.

Types of Signage

Monument/ Gateway Signage

Monument or Gateway signs are used to mark an entry into a neighborhood or district with a primary purpose to inform pedestrians and vehicular traffic.



Example of building signage.

Building Signage

Building signs are mounted on building surfaces and may include colorful and illuminated feature signs, parapet signs (that do not extend above the parapet), building entry signs, and address signs. Parapet signs are intended for long distance viewing, whereas building entry signs are oriented to closer viewing.

Storefront Signage

Storefront signage is intended to emphasize the presence of retail stores and other commercial development, such as leasing offices. This signage type includes retail signage, business identification, and residential tenant information. Signage for storefronts may be designed as hanging signage under canopies or mounted on the building.

Temporary/Moveable Signage

Temporary signs augment the storefront character and provide timely information regarding available products and services. This sign type includes poster display cases, banners, display stands or easels, and painted sandwich signs.

Wayfinding Signage

The purpose of wayfinding signage is to establish a sense of place by directing pedestrians, bicyclists, and vehicle motorists to destinations within the neighborhood.

Blade sign as storefront signage.

Moveable signage placed to leave open zone for pedestrians.

Example of wayfinding signage.

Signage Standards

F.1.1 Signs within the Plan Area shall comply with all regulations stated in the City's Zoning Ordinance (Chapter 17.32) unless otherwise specified in the Precise Plan.

F.1.2 Signs shall be made of high-quality, durable, and environmentally friendly materials.

F.1.3 Multi-tenant development anchor-identity signs should be complementary to any Plan Area signage or established by the Master Developer. Individual property owners will be allowed to use letter styles, but the overall sign should have one consistent material for letters and background.

Monument/Gateway Signage

F.2.1 The Precise Plan shall include up to two freestanding monument/gateway signs: at the Serramonte Boulevard and Entry Drive intersection and at the West Drive and Campus Drive intersection, which form major entry points to the Plan Area.

F.2.2 If provided, a single gateway or monument sign at the southern portion of the Plan Area near the roundabout shall be located at Parcel E and be less than 4 feet high. The sign shall not obstruct sightlines for drivers to the extent safety is compromised.

F.2.3 If provided, a single gateway or monument sign at the northern portion of the Plan Area near the Retail Plaza shall be located at Parcel B. It may either be less than 4 feet high and no longer than 20 feet, or may be a tower structure--either integrated with the Parcel B building corner or separate from the building. If an integrated tower structure, the structure shall not project more than five feet beyond the face of the building in any direction.

If an independent tower structure, it may not be greater than 32 feet in height and not more than 64 sq. ft. in area. The maximum face area of signage of the tower structure shall not exceed 200 sq. ft.

F.2.4 Gateway or monument signs shall not have internal illumination but will be lighted with externally mounted luminaires.

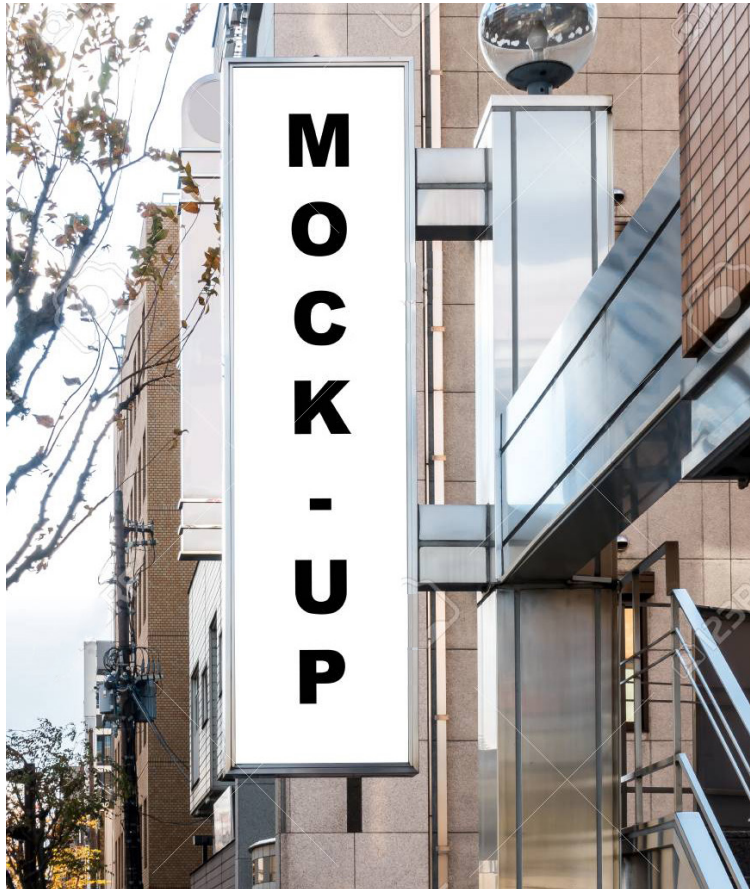
Building Signage

F.3.1 The physical design of signage shall conform to the architectural detailing of the associated building.

F.3.2 Signage shall not obstruct architectural details such as recesses, structural bays, or windows.

F.3.3 Externally illuminated or halo lit signs are encouraged. The use of internally lighted or box type signs are prohibited. Internally lighted signs measuring 2 sq. ft. or less are allowed.

F.3.4 No more than three (3) building residential signs shall be provided per building. These shall be limited to address number, street name, and/or a building name if desired. If only one is provided, it shall be placed close to the main entry to the building. If signage is provided at more than one location, a minimum of one shall be placed close to the main entry. The second and third can be located such that the top of the signage is not greater than 25' feet from grade. The aggregate sign area shall not exceed 150 sq. ft.



Wall mounted vertical building signage.

F.3.5 Durable, vandal-resistant materials and finishes shall be utilized for address signs.

F.3.6 Conduit, tubing, or raceways shall be concealed. Transformers and other equipment for the signage shall also be concealed.

Storefront Signage

F.4.1 Signage for multi-tenant retail buildings shall be developed to minimize potential visual conflict, clutter, and competition.

F.4.2 Maximum size for sign area per retail tenant is 30 sq. ft. on the face of a building. A second sign per retail tenant, not exceeding 20 sq. ft., may be hung as either a banner or a rigid sign perpendicular to the building face. Either of these two sign types may be attached to a building's architectural canopy.

F.4.3 For ground floor retail uses, hanging or projecting signs should be located near the front entry of a store. Coordinate with the overall design of the street wall. Hanging or projecting signs shall meet Americans with Disabilities Act (ADA) clearance requirements.

F.4.4 Ancillary retail space or leasing offices shall be signed in a manner consistent with the storefront signage standards in this section.

Prohibited Signs

Prohibited signs include:

F.5.1. Signs which rotate, move mechanically or by the wind, flash, blink or reflect light by means of a polished or mirrored surface.

F.5.2 Open flames, balloons, loudspeakers used to call attention to a product, service, or a property.

F.5.3 Signs which identify or advertise a product or service not available on the premises.

F.5.4 Externally illuminated signs where the source of light is directly visible or cause glare or reflections that are a traffic hazard or nuisance.

F.5.5 Signs which emit or reflect light by means of direct fluorescence, phosphorescence, or "day-glow" colors.

F.5.6 Any sign illumination which exhibits undue glare.

F.5.7 Any sign placed or displayed on vehicles parked primarily for the purpose of displaying the sign. (This does not apply to food trucks that are parked while they provide service.)

F.5.8 Internally lit signs where the entire face of the sign is illuminated, rather than just the graphics.

F.5.9 Advertising bench signs, unless required by SamTrans at Serramonte Blvd.

F.5.10 Off-site directional signs.

F.5.11 Roof signs.

F.5.12 Outdoor advertising billboard signs.

F.5.13 Abandoned signs.

G. LIGHTING

Lighting in the Plan Area will be comprised of street lighting, pedestrian-scale lighting, lower-illumination pedestrian lighting, and building lighting. See Figure 3.8 Lighting Diagram for Locations. A uniform lighting approach will contribute to overall community aesthetic and ensure safety for walkways, bikeways, and roadways. All lighting implemented within the Plan Area shall adhere to the following standards[7].

General Lighting Standards

G.1.1 Lighting shall incorporate dark sky principles by shielding fixtures to prevent light from emitting above a 90-degree angle. Any lighting source located on parking or rooftop parking shall be a full cutoff type.

G.1.2 Light shall be designed to minimize glare and light trespass into neighboring buildings and properties.

G.1.3 High-efficiency technology such as LED lighting with advanced controls shall be utilized to minimize energy consumption.

G.1.4 The use of energy–efficient, long-life LEDs with light color rendered as a warm white (maximum K 3000) is encouraged.

Street Lighting

G.2.1 Provide streetlights in general locations shown on Figure 3.8, Lighting Diagram for Locations.

G.2.2 Streetlights shall comply with Daly City standards.

Pedestrian Lighting

G.3.1 Provide pedestrian lighting in general locations shown on Figure 3.8, Lighting Diagram. Additional locations for pedestrian lighting are along pedestrian pathways in open spaces and in surface parking areas.

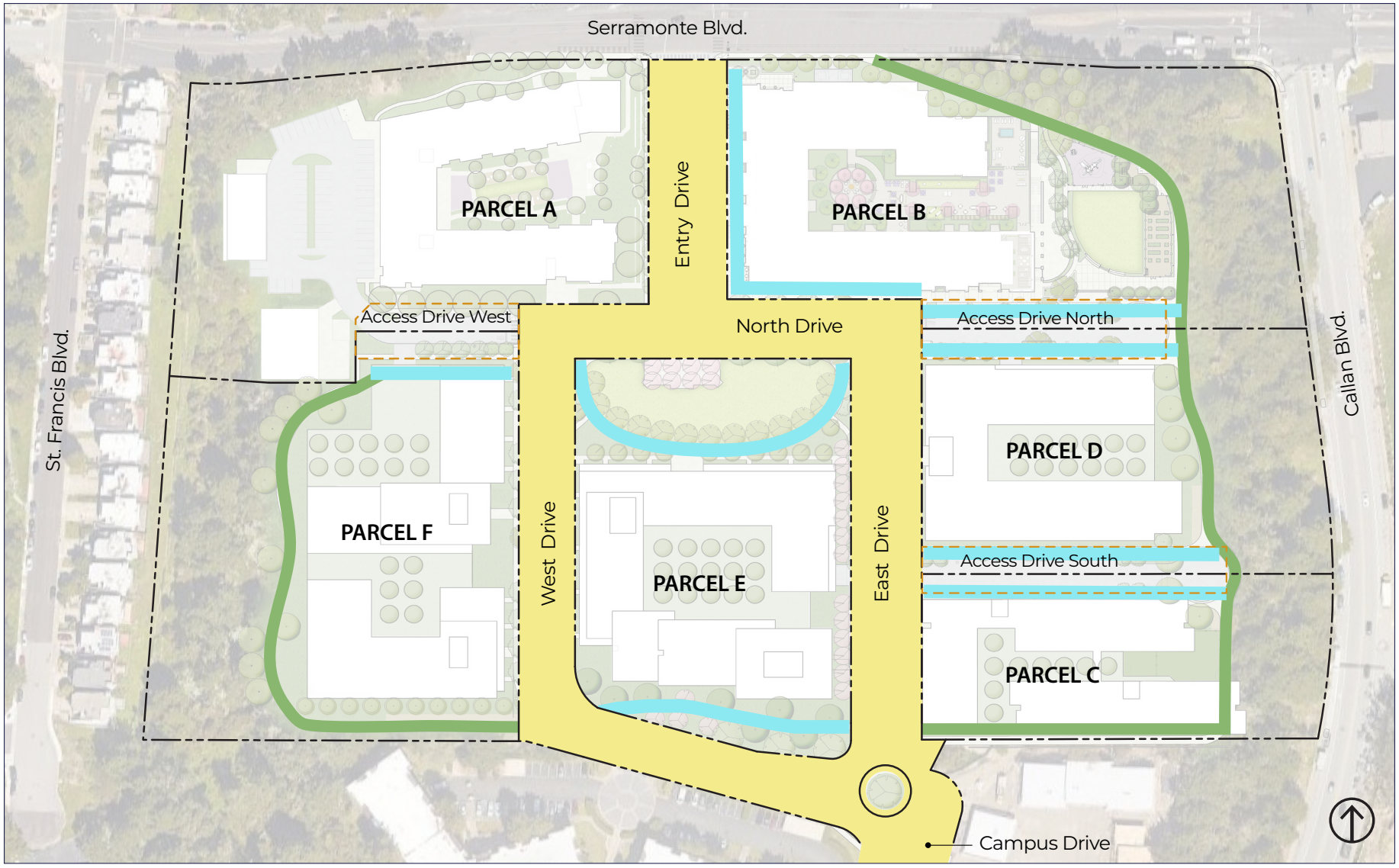
G.3.2 Pedestrian lighting shall not be taller than 25 feet in height.

G.3.3 Pedestrian lighting may be integrated with street-lighting by providing additional luminaires facing the sidewalk on streetlight poles, installed at a lower height than street luminaries.

G.3.4 Lighting in surface parking lots and service areas shall be directed away from surrounding buildings and properties using fixtures that minimize light trespass and glare.

7 For Parcel A, no additional lighting is required to what is installed.

Figure 3.8 Lighting Diagram



Pedestrian lighting in a park setting.

Luminaires highlighting a building facade.

Lower Illumination Pedestrian Lighting

G.4.1 Commercial grade bollards, step lights, and path lights shall be used as appropriate along pedestrian walkways and plazas.

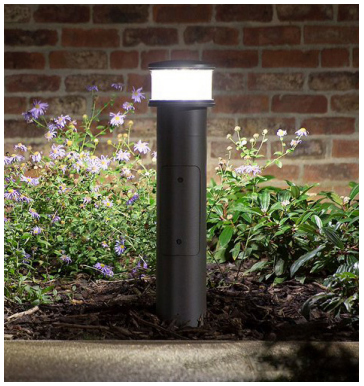
G.4.2 Nighttime lighting for recreational uses in parks and public spaces should be unobtrusive and control glare.

Building Lights

G.5.1 Lighting should be integrated into the design of buildings and building architecture to highlight significant architectural features such as signs, entrances, walkways, or storefront displays.

G.5.2 Building facades may be illuminated using shielded fixtures to highlight architectural features.

Retail lighting.



Landscape lighting.

H. DEFINITIONS

Active Ground Floor Use: Active ground floor uses are land uses that generate pedestrian activity at the interior and exterior of buildings at the ground floor at streets and public spaces. Active uses can be retail, commercial, educational, artistic, institutional or community uses such as a community room or daycare.

Amenity Space: Residential amenity space may include: co-working space, health, and wellness, grab and go snack items, pet amenities and other shared or community uses that can be visible to the street.

Building Envelope: The building envelope defines the spatial area within which permitted density can be configured. The Precise Plan defines the allowable building envelope horizontally by block size and required street frontage and vertically by building height, massing, and guidance for pedestrian, podium, and skyline levels of architectural design.

Build-to Line: The build-to line for a parcel is the line where the façade of the building, or the podium street wall, is located, parallel to and measured perpendicular from the property line.

Corner Expression: Corner expression is accentuating building massing at the joining of two facades with a projected, recessed, or vertical change in building massing.

Face of Curb: The face of curb is the vertical sloping surface of the side of a roadway curb, not including bulb-outs, curb extensions, curb-cuts, or pull-outs for drop off and loading zones.

Height: The height for a building is calculated from the building's Average Finished Grade to the top of the parapet at the building's primary roof. The Average Finished Grade is the average of the high and low elevations at the building's exterior adjacent to North Drive, West Drive, East Drive, or Entry Drive, or the three access drives leading from East Drive or West Drive.

Massing: Massing is the three-dimensional bulk of a building in terms of general shape, form, height, width, and depth.

Pedestrian Level: Pedestrian level is the design of the ground floor public experience shaped by active ground floor use, diversity of use, and street frontage design.

Podium Level: The podium level is the portion of the building above the ground floor and below the skyline level that provides spatial definition to the adjacent street or public space.

Primary Building Wall: The primary building wall is the building façade. Window or wall recesses or projections are not counted as primary building wall or façade of the building.

Privately-Owned, Public Open Space: Privately-owned outdoor space that functions as public space but may have limited hours of availability.

Property Line locations: Property line locations to measure Build-to lines are measured from the face-of-curb for publicly accessible private streets, a designated property line along an access drive, or back of sidewalk along public streets.

Public Realm: The public realm is exterior urban space shaped by buildings comprised of publicly accessible streets, parks, open spaces, pathways, and civic facilities.

Street Wall: The street wall is the continuous façade of a building that establishes the edge of the public realm for a street or public space.

Skyline Level: The Skyline level is the uppermost occupiable portion of the building above the podium level. The Skyline level contributes to the overall urban form and skyline of the plan area.

Setback: The required minimum distance for the placement of a building measured from a property line, face of curb or another feature.

Streetscape: The visual character of a street comprised of the travel way, bike facilities, sidewalk, site access, landscape, paving, street furniture, building frontage, open space, views, and other perceptible urban features.

Stepback: Stepback is a horizontal recess applied to the upper floor or floors of a building to reduce shadow area on the adjacent street or open space.

Transparency: Pedestrian level building design that creates visibility and permeability between the building and the adjacent sidewalk or public space.

Vertical Shift: Vertical shift is variation in the roof line or vertical massing of the building or building elements.

4. Circulation

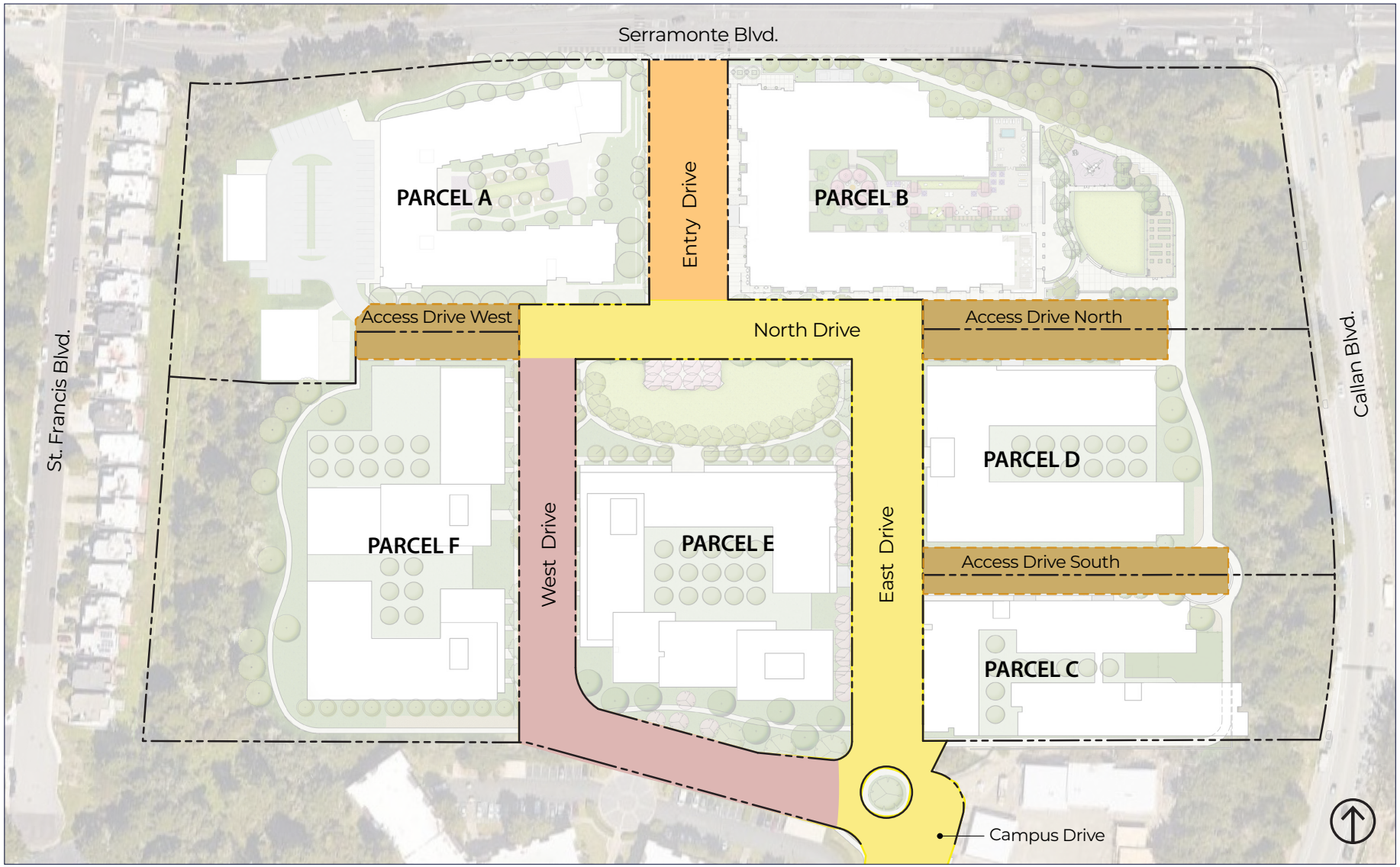
The Plan Area's circulation network is a system of "complete streets" to support active transportation for healthy living and advance Daly City's Vision Zero program to reduce pedestrian fatalities. Members of the public may park on private streets and access ways to use publicly accessible park, trail and open space areas except as may be reserved for loading, drop-off/pick-up, short term retail parking, spaces accommodating Head Start or during time limits for public use for residential parking

A. STREET NETWORK

As shown in Figure 4.1, the neighborhood circulation system is a loop of traffic calmed low-speed streets, connected to regional roadway, transit, bicycle, and pedestrian systems. Serramonte Boulevard is a transit, vehicle and bike corridor connecting city neighborhoods to regional shopping and the highway network. The Precise Plan circulation is comprised of the following five street types[1]:

1 See Development Agreement for scope of Serramonte Boulevard and Highway 1 ramp intersection improvements, including transit, bike lane, and pedestrian crossing improvements.

Figure 4.1 Street Hierarchy



Entry Drive – Main Street

Entry Drive is the Plan Area's "pocket" Main Street with shops spilling outdoors onto a linear pedestrian plaza extending from Serramonte Boulevard to the heart of the plan area, Central Green. The street section, as shown in Figure 4.2, is comprised of:

- Two 11-foot travel lanes, two 10-foot continuous through/turn lanes, five-foot protected bike lanes with a two-foot buffer, and a six-foot landscape median.
- On the west side, a six-foot sidewalk and five-foot planting strip.
- On the east side, a wide sidewalk comprised of three zones: a planting and street furniture zone, and through zone for pedestrians and a frontage zone for active ground floor uses to extend onto the sidewalk.

Figure 4.2 Entry Drive and Retail Plaza

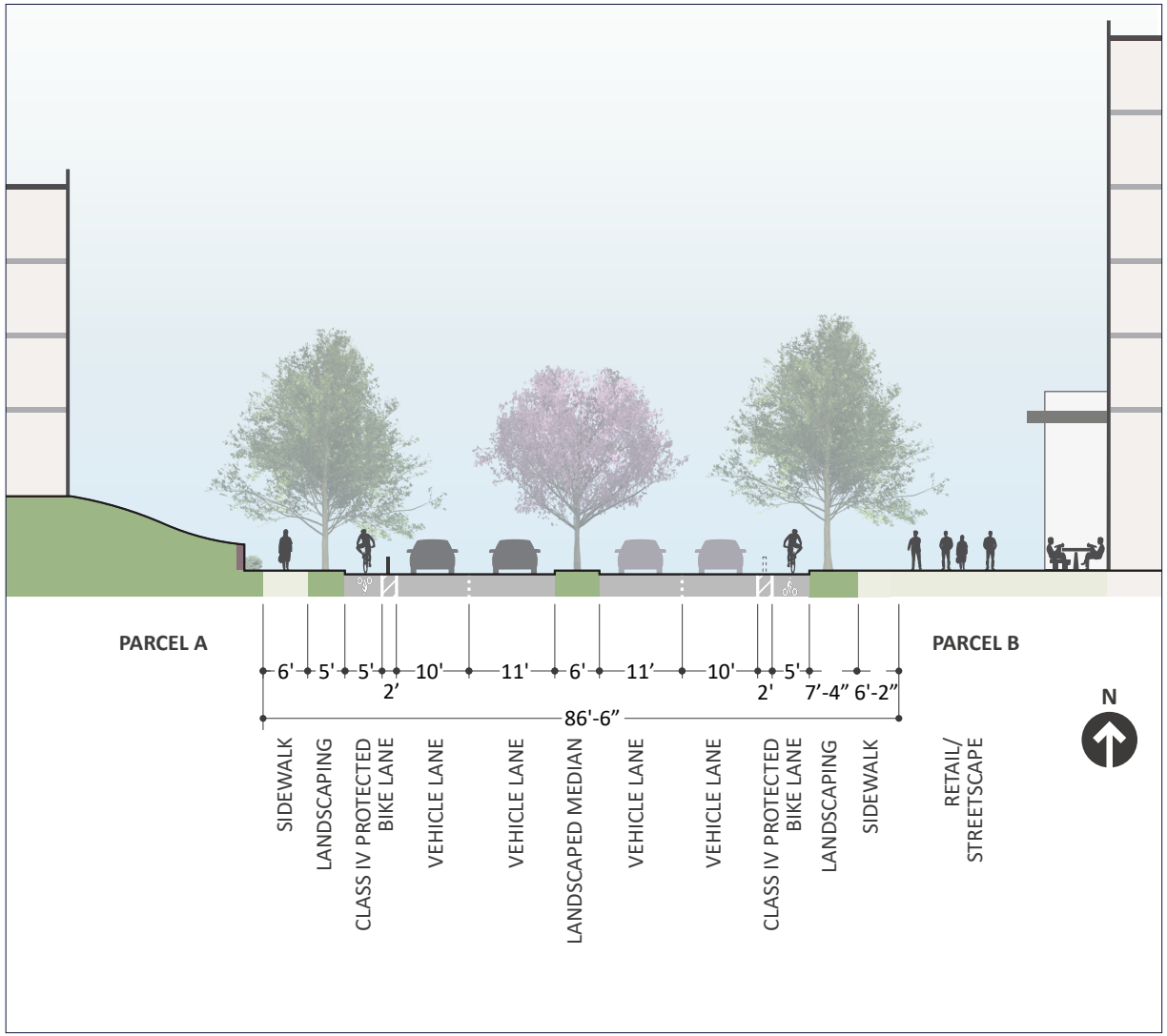


Figure 4.3 Plaza/Park Entry at North Drive

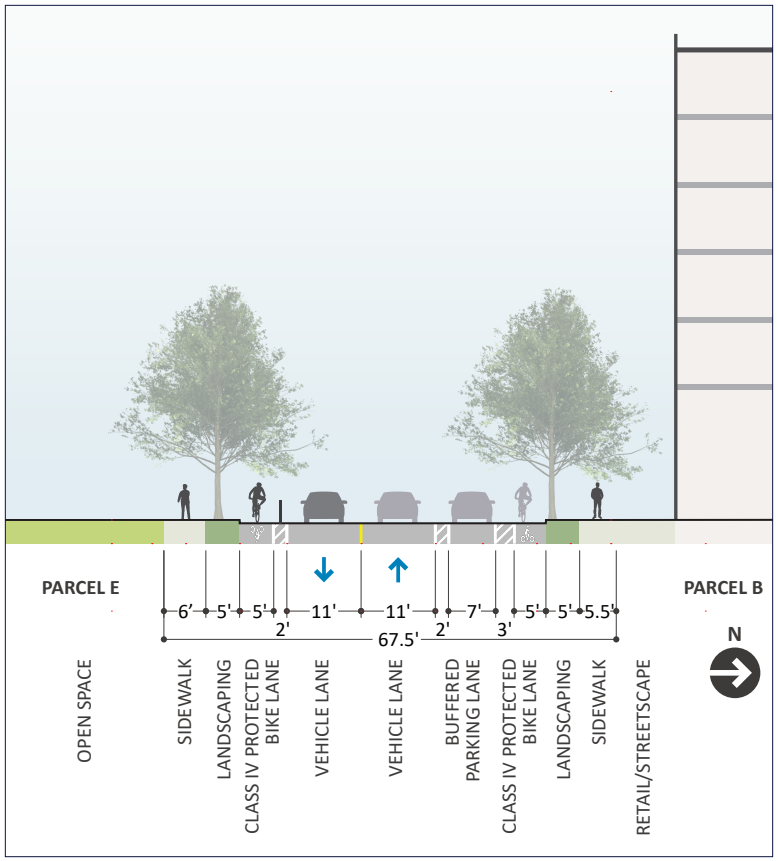
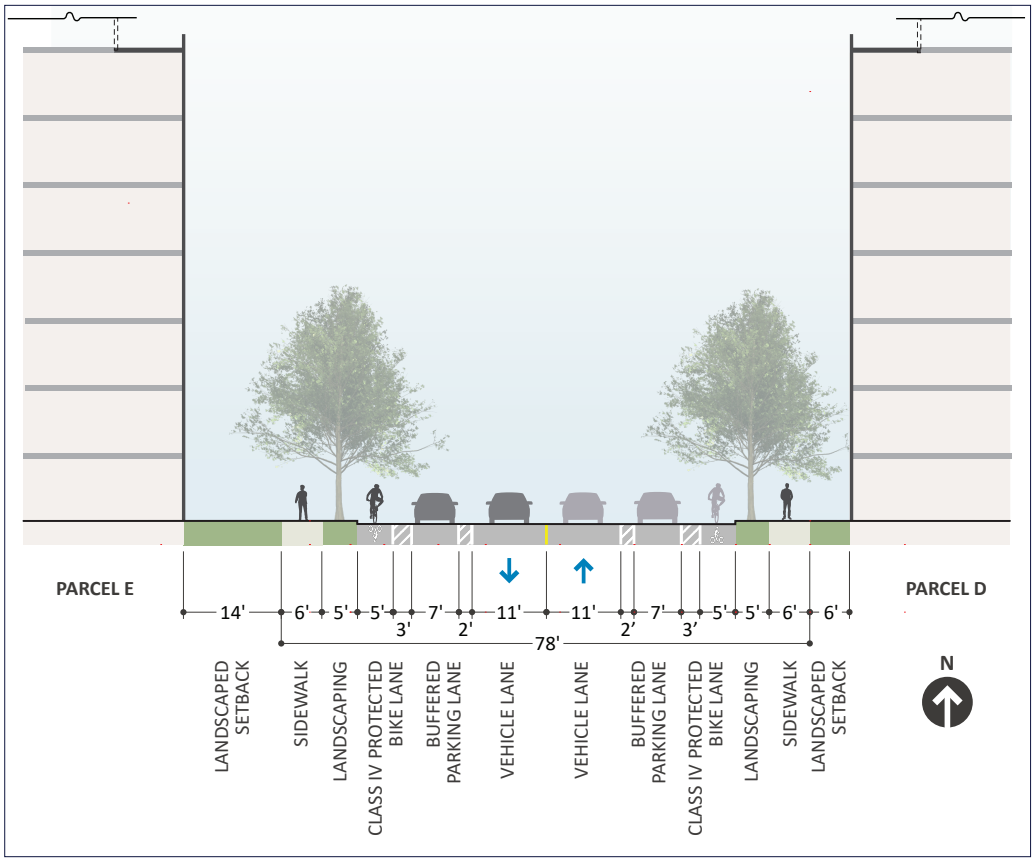


Figure 4.4 East Drive



North Drive and East Drive - Local Connector Streets

North Drive and East Drive are connector streets as a through route from Entry Drive to Campus Drive for vehicles and cyclists to travel from Serramonte Boulevard and Highway 1 ramps intersection to Campus Drive and Hickey Boulevard intersection. The street sections, as shown in Figures 4.3 and 4.4, are comprised of:

- Five-foot Class IV protected bike lanes in both directions and two 11-foot travel lanes with buffered on-street parking.
- Five-foot tree-lined planting strips with six-foot sidewalks on both sides of the street
- Existing Campus Drive is to be improved with Class II bike lanes on both sides of the street from East Drive to Hickey Boulevard.

- Restripe Campus Drive from roundabout south to Hickey Boulevard for buffered Class II bike lanes with six-foot bike lane and four-foot buffer on both sides of the street.

West Drive - Neighborhood Street

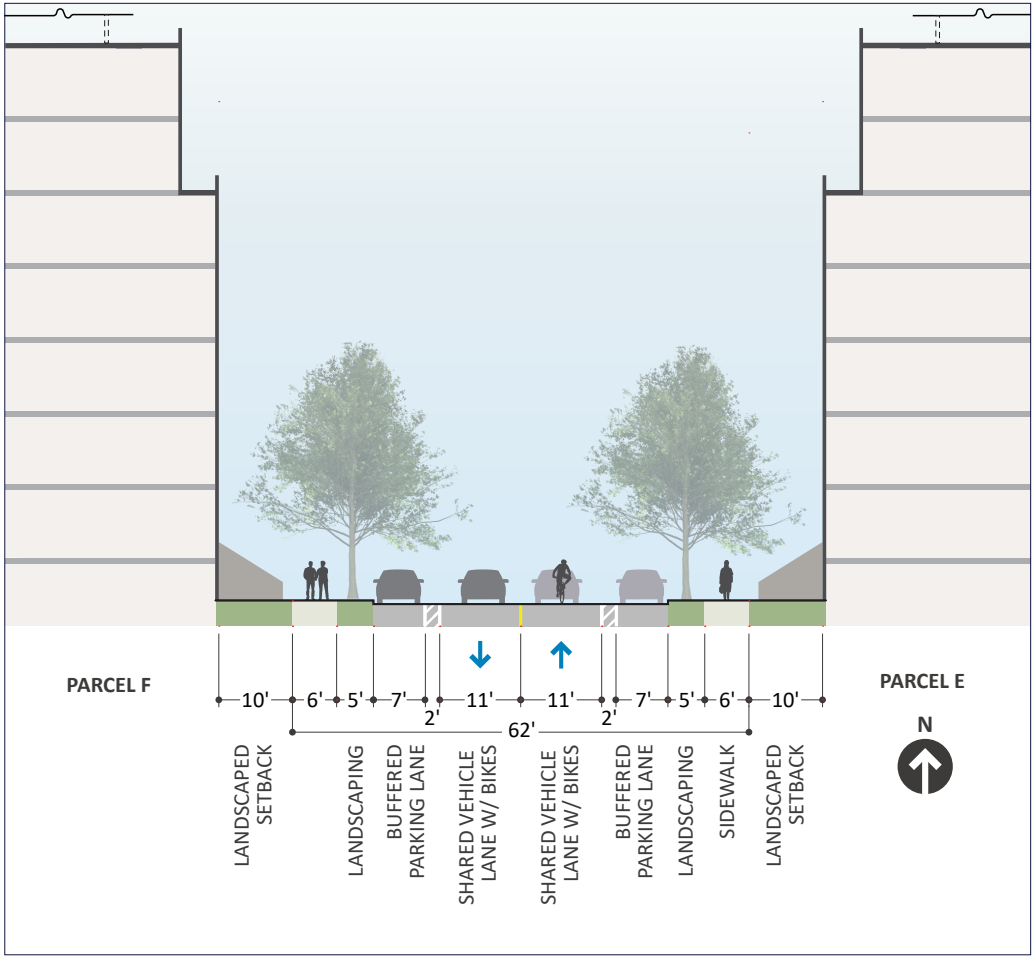
West Drive is a low vehicle speed residential street. West Drive connects with North Drive and Campus Drive to create a loop roadway network. The street section, as shown in Figure 4.5, is comprised of:

- Two 11-foot travel lanes with sharrows and buffered on-street parking.
- Five-foot tree-lined planting strips with six-foot sidewalks on both sides of the street.

West, North and South Access Ways – Access Easements

Access ways are two-way, pedestrian-oriented access easements with on-street parking designed for pedestrian access to park, daycare, retail, parking and hillside open space and trails. North and South Access ways are cul-de-sac streets with on street parking.

Figure 4.5 West Drive



- North Access Way provides access to Overlook Park, the recreational trail and east hillside open space.
- South Access Way provides access to daycare, the recreational trail and east hillside open space.
- West Access Way provides entry to parking for Parcel A and Parcel F.

B. MOBILITY

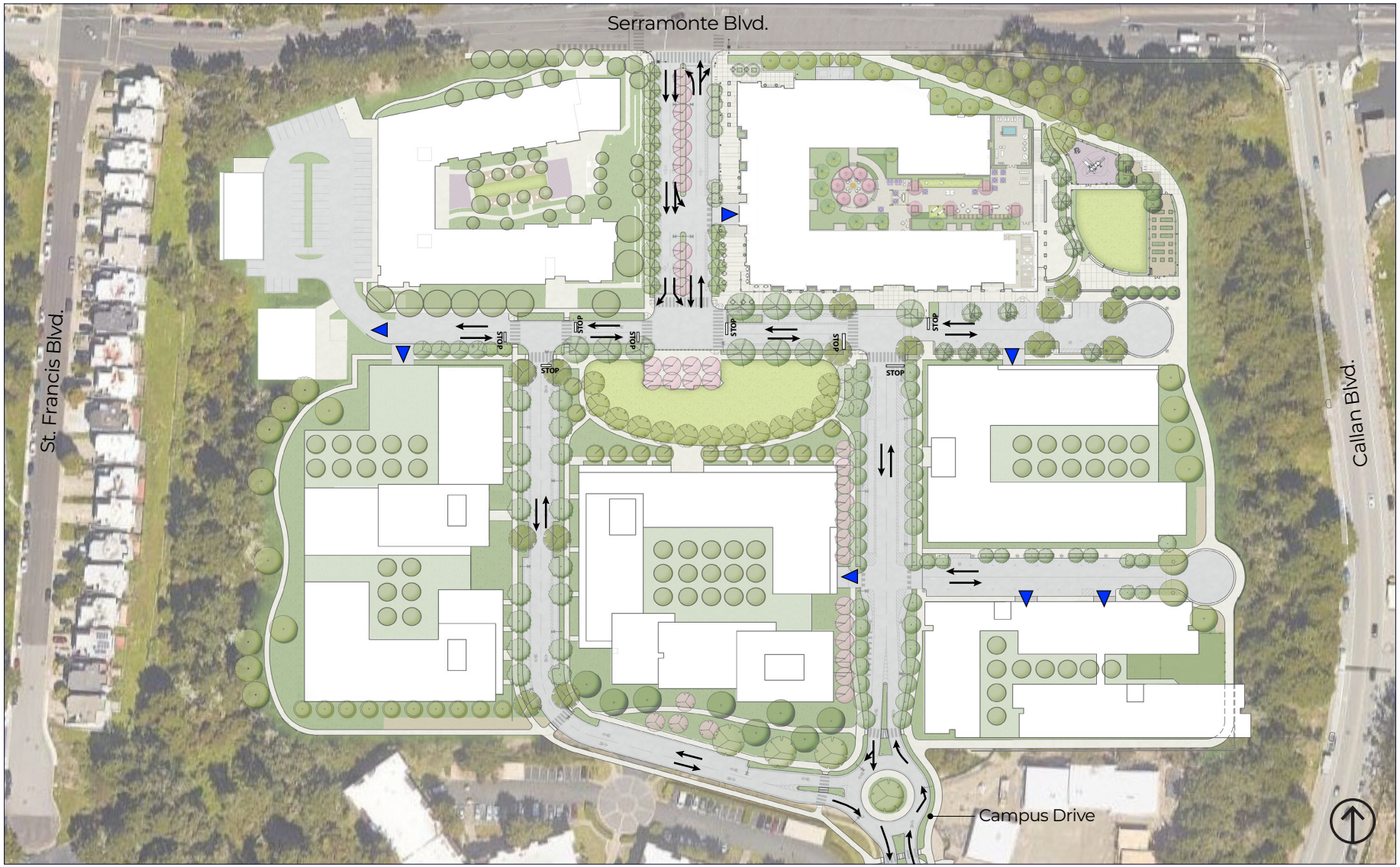
Vehicles

Vehicular access through the Serramonte Del Rey neighborhood is a system of low-speed tree-lined private streets connecting Campus Drive south of the site to Serramonte Boulevard at Entry Drive. Traffic calming measures are proposed to minimize cut-through vehicle traffic. Entry Drive has direct access to State Route 1. Interstate 280 is approximately one-half mile east of the site, with full-movement interchanges provided via Serramonte Boulevard and Hickey Boulevard. From State Route 1 and Interstate 280, vehicles can access the regional roadway network of the Bay Area. See Figure 4.6.

Transit

The Plan Area is well served by local and regional transit systems. This stop is served by SamTrans Route 120 with direct service to the Colma and Daly City BART Stations. This route operates on frequent, 15-minute headways during weekday commute hours. Located approximately one mile from the Daly City BART Station and in close proximity to the Colma BART station, SamTrans bus service links the site to the regional transit system serving the Bay Area, including downtown San Francisco, Oakland, and the East Bay. Connections to Caltrain, and eventually California's high-speed rail, are available at the Millbrae Transit Center just south of the City. SamTrans Route 121 connects to Skyline College.

Figure 4.6 Vehicle Circulation



Source: https://nacto.org/wp-content/uploads/gallery/2012_bufferedbikelane/bufferedbikelane_austin02.jpg

Street with buffered Class II bike lanes.

Bicycles

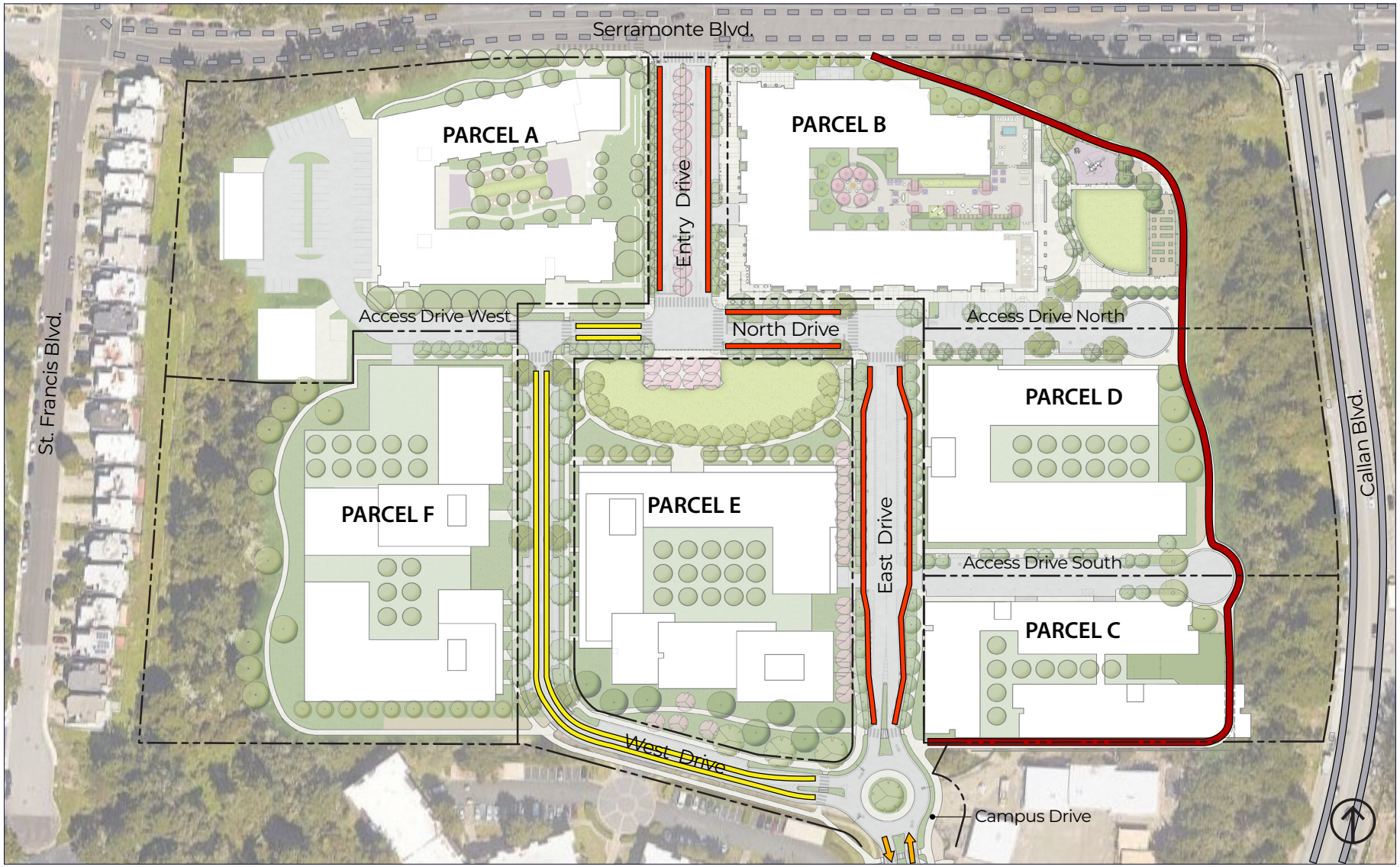
Existing bicycle facilities include Class II on-street bike lanes on Callan Boulevard south of Serramonte Boulevard and a Class III bike route on Callan Boulevard north of Serramonte Boulevard. A Class II on-street bike lane is striped on St. Francis Boulevard north of Serramonte Boulevard. Daly City's Walk Bike Daly City Plan envisions pedestrian and bicycle improvements adjacent to the Plan Area. One priority improvement in the Walk Bike Daly City Plan is the construction of Class IV on-street protected bicycle lanes on Serramonte Boulevard.

Planned bicycle facilities in the Plan Area are Class II buffered bike lanes, Class IV protected bike lanes, a dedicated Class I pedestrian/bike path and Class III bike "sharrows." With short block lengths, low traffic volumes, and narrow cross sections, the site's roadways will provide bicyclists with a comfortable on-street experience. For younger and more recreational riders, the off-street trail provides a safe route from the SamTrans bus stop on Serramonte Boulevard and Entry Drive to Summit Shasta Charter High School.

Pedestrians

Residents can walk and bike through the site and access on-site recreation and retail amenities. Sidewalks are provided on every street within the Plan Area, with curbside planting strips for street trees and storm water filtration. The trail loop will also serve to provide pedestrian access around the site that is separated from vehicles and in a more natural setting. Sidewalk and trails offer unimpeded access to walk between the Plan Area's parks, open spaces, residences, and retail shops.

Figure 4.7 Bicycle Circulation



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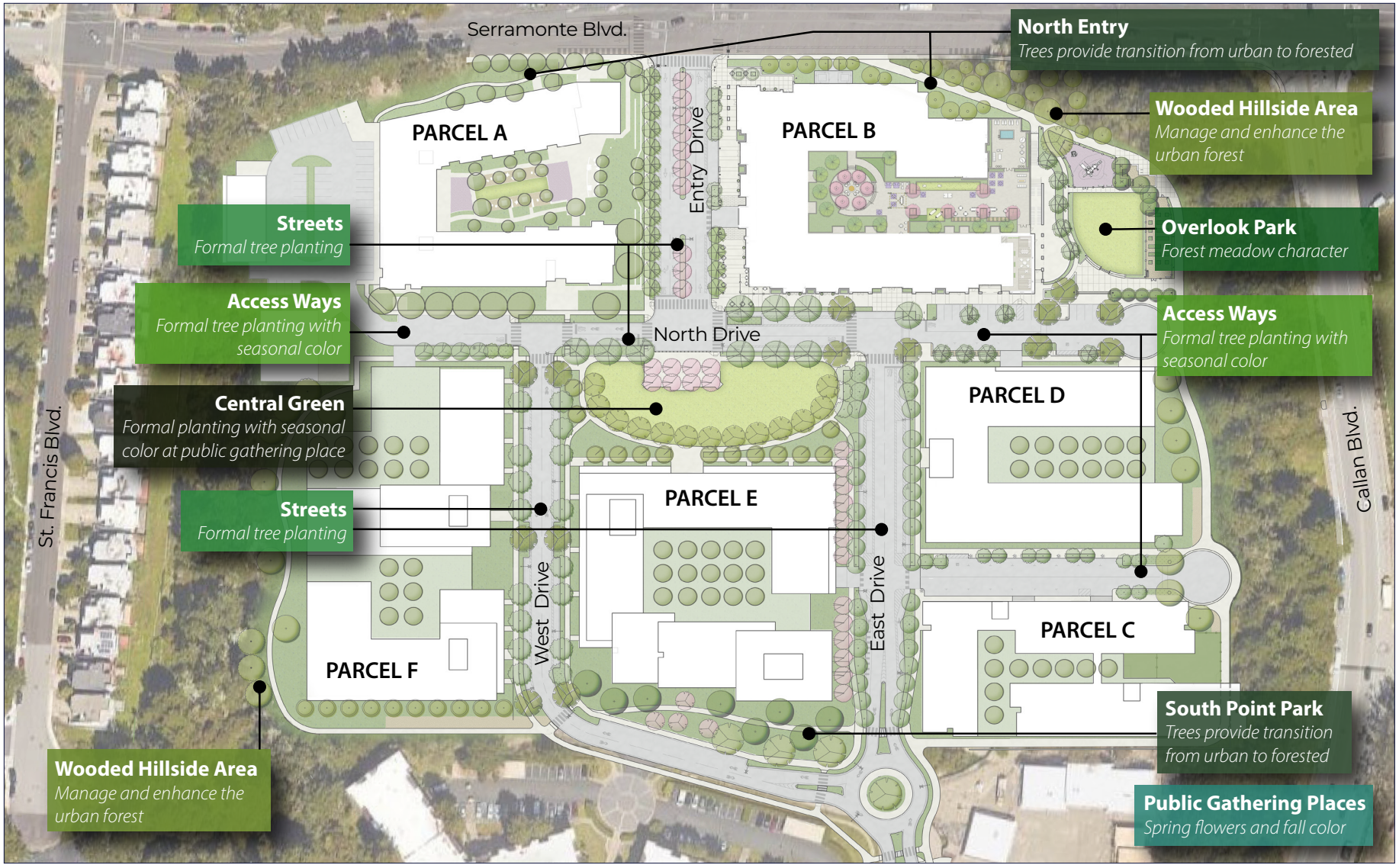
5. Parks and Open Space

This section describes the landscape design concept, design objectives, neighborhood park and open spaces, tree planting plan, and landscape design standards.

A. LANDSCAPE DESIGN CONCEPT

The Precise Plan's landscape design concept is to shape a diverse urban landscape as shown in Figure 5.1. A distinguishing feature of the Precise Plan are the wooded hillsides to the west and east of the plan area. Trees vary in health, ranging from young to mature and were planted by the District with the development of the high school. A rectangular street and block pattern of buildings is organized around a central neighborhood park, the Central Green. Along the east hillside is a recreational trail featuring Overlook Park, to the south is South Point Park and to the west is a walking trail along western hillside wooded open space. The combination of park and open spaces with recreational and walking trail access offers residents and visitors diverse opportunities to connect to nature, restore human well-being, socialize with neighbors, and satisfy needs for outdoor recreation for families and people of all ages. A variety of street and park tree species, suitable for the climate and context of the area are selected to create identity and sense of place. Seasonal interest is created with deciduous trees providing spring flowers and fall color at public gathering places, streets, and access drives.

Figure 5.1 Urban Forest Concept Plan



Objectives

The parks and open spaces shown here are concept level design plans, to guide buildout of the parks, streets, and landscape. The purpose of the landscape design concept is to improve physical and psychological health, strengthen community relationships, and create an attractive urban setting for family living. Landscape design objectives are as follows:

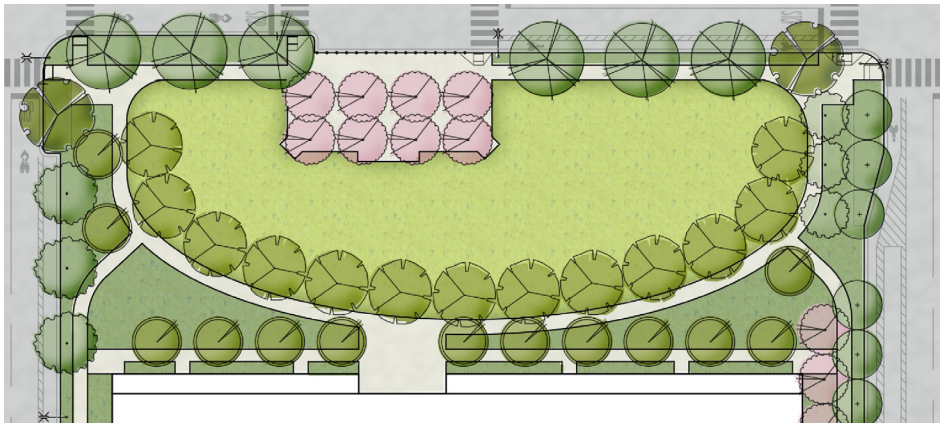
- Create safe, attractive outdoor places for healthy living to foster physical activity, meet resident and visitor needs for recreation and play for people of all ages, as well as encourage walking and biking.
- Design public places to encourage social interaction and community life with social gathering places that are family-oriented, active places.
- Shape environments that visually and physically connect people to nature, neighborhood parks, green spaces, and recreational trails.
- Preserve and enhance the aesthetic and ecological quality of the hillside open space areas and expand the diversity of street trees and park plantings to cultivate an urban forest for the plan area.
- Enhance community sustainability and resilience through climate-positive environmental design.

B. NEIGHBORHOOD PARK AND OPEN SPACES

Central Green

Central Green is the heart of the neighborhood – a park extending an entire city block greeting residents and visitors into the site from Entry Drive. Organized by a tree-lined crescent shaped walk, the park features an entry plaza with tree-shaded seating, an open meadow, and a backdrop of evergreen woodlands with social spaces nestled under the tree canopy and along the park edges for community enjoyment. This open lawn is a flexible open space for recreation and enjoyment of nature to picnic, walk a dog, or enjoy the sunshine.

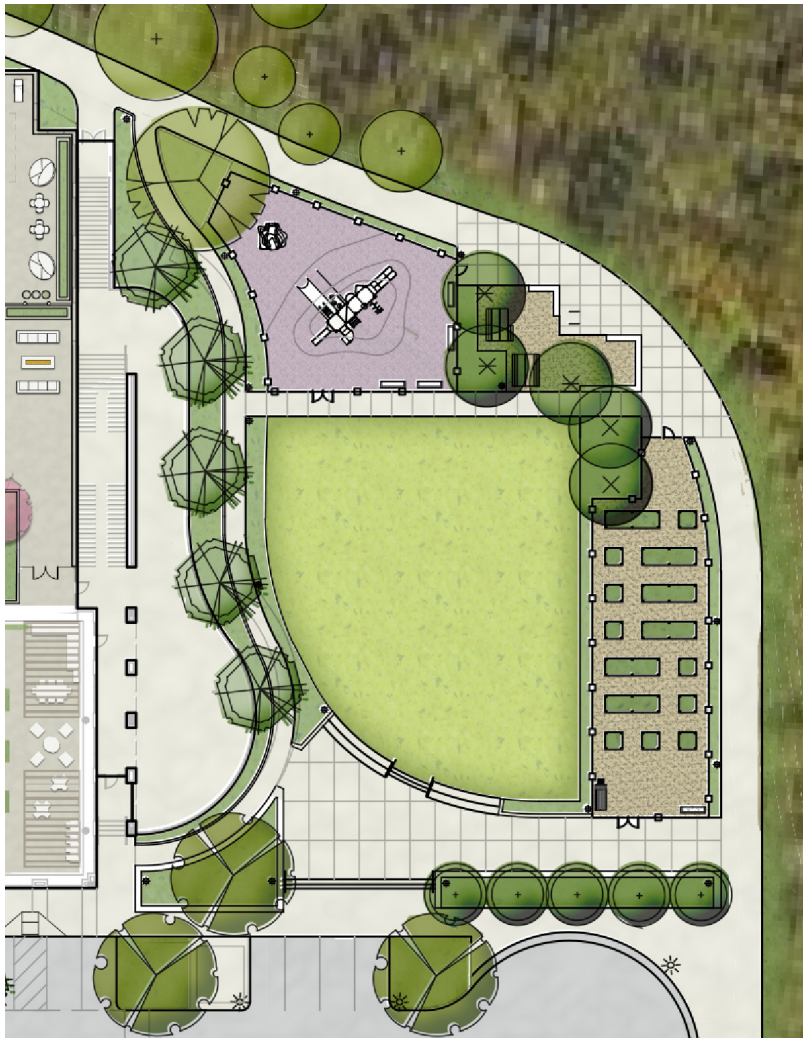
Central Green Plan



Overlook Park Rendering

Overlook Park looking from the Eastside Recreation Trail.

Overlook Park Plan



Overlook Park

Overlook Park is designed as a family-friendly open space. Gently sloped lawns provide ample space for a wide range of activities: dining and gathering, outdoor fitness classes, community events, and an opportunity to sit and enjoy the views. A community garden with raised beds is at the pedestrian and bicycle path along the east hillside. A large playground provides inclusive play opportunities on interpretive play structures for young children, while a small plaza at the park edge provides a connection to the multi-use loop trail and reinforces the viewer's sense of place. Viewsheds look towards regional landmarks including Daly City, San Bruno Mountain, and beyond.

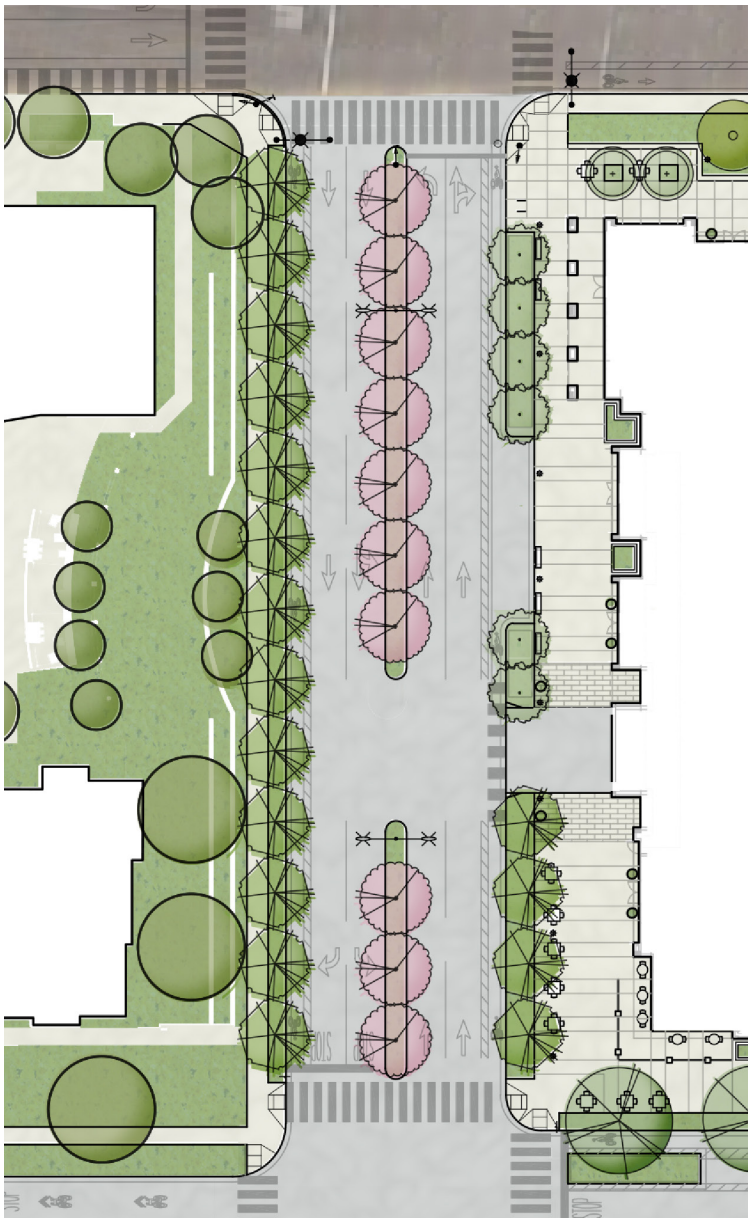
Entry Drive Plaza

Entry Drive Plaza is a "pocket" Main Street with plaza-width sidewalk space for retail activity to bring life out-doors to the street. The Plaza provides a building frontage zone for access to retail uses and sidewalk seating; a pedestrian through zone for pedestrian movement; and a zone for street furniture, lighting, benches, street trees, bicycle parking, fixed and movable seating. Together these zones create an attractive and comfortable setting for neighborhood shopping and social life. The plaza sidewalk space will have enhanced pavement treatments with color and/or pavers to high- light active public spaces.

Hillside Open Spaces

Hillside Open Spaces are existing east and west hillsides of the plan area with mature trees planted as part of the landscape development of District property. These areas offer residents an opportunity to connect to nature and provide a visual screen of the planned buildings for residents of the surrounding community.

Entry Drive Plaza Plan



South Point Park Plan

South Point Park

South Point Park on Parcel E is a landscape area that provides entrance identity to the plan area, landscape continuity for the "urban forest," and social space for residents. Enhancements to South Point Park include passive open space, a pedestrian path, and lighting, sitting area or water feature with unique landscaping and plantings.

Eastside Recreational Trail

Eastside Recreational Trail is a pedestrian-bicycle trail for strolling and recreation extending from Serramonte Boulevard to the roundabout along Campus Drive to the south. This 8 to 10-foot-wide multi-use trail provides an off-street connection for pedestrians and bicyclists to access Overlook Park and access to the westside hillside open space.

Westside Walking Trail

Westside Walking Trail is a six-foot-wide trail around the west side of Parcel F, weaving along the base of the wooded hillside slope. Together the east and westside trails create an off-road half-mile loop trail system. This trail system connects each parcel, every street, and all members of the community to direct access to the wooded hillside open space.

Westside Walking Trail Section

0 6
Scale (Feet)

Eastside Recreational Trail Section

0 6
Scale (Feet)

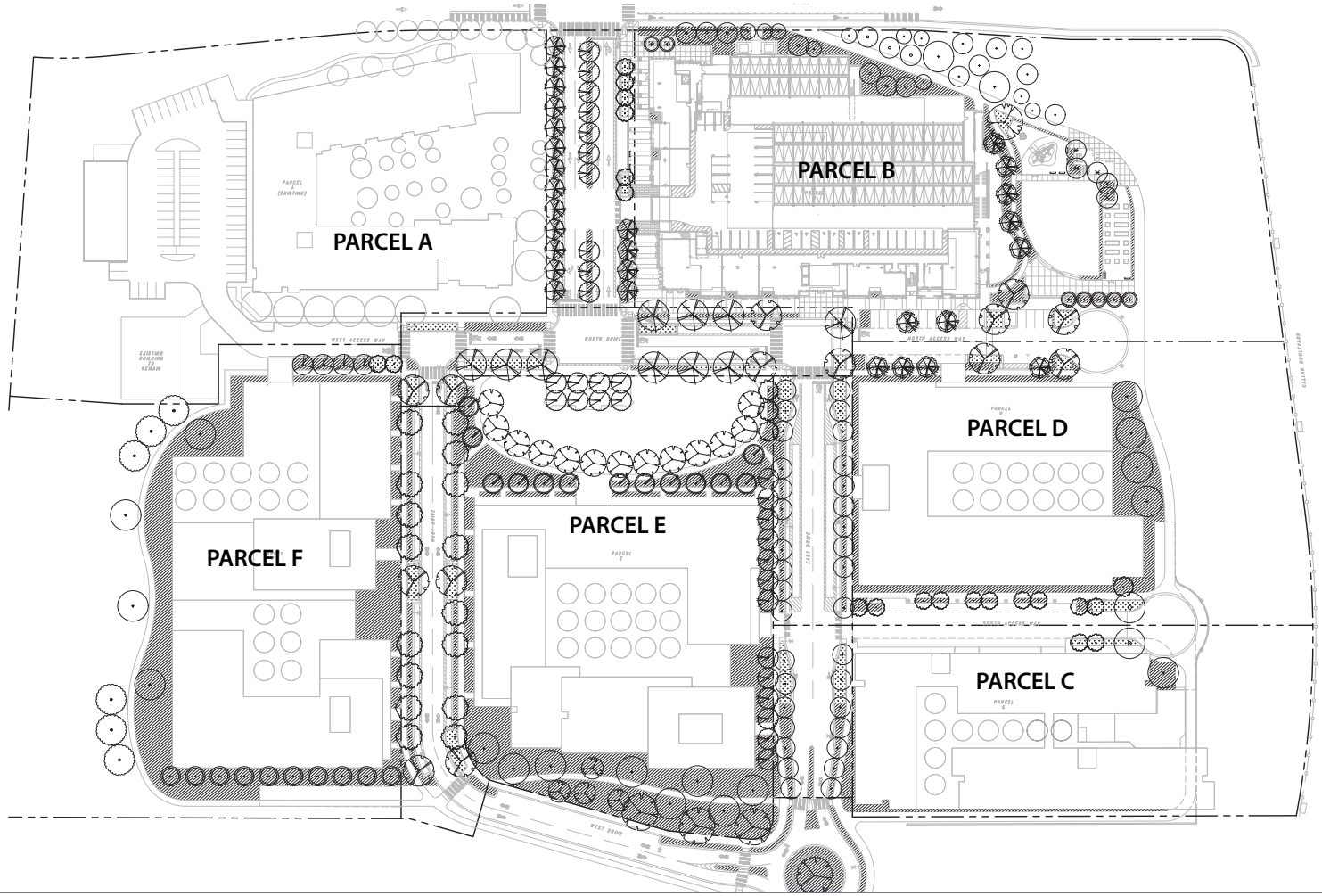
C. PLANTING PLAN

The type and arrangement of street trees and park plantings will contribute to a healthy and attractive urban neighborhood. The trees used throughout the Plan Area shall be carefully selected to work within the Urban Forest framework while allowing expression of individual character. The tree species list in Table 5.1 shall be used for specifying tree species for parks, streets and open spaces located per the street tree planting plan in the Appendix and as shown in Figure 5.2.

A diversity of tree species, suitable for the climate and context of the plan area are selected to create identity and sense of place. Seasonal interest will be created with deciduous trees providing spring flowers and fall color at public gathering places along Entry Drive, Central Green, and access drives. Continuous planter strips separating streets from sidewalks are along all internal streets and drives, and are planted with broad canopy trees, low shrubs, and groundcovers.

The north and south entries to the plan area will be visible locations of tree plantings selected and arranged to transition from the informality of a forest to a more ordered urban setting. Entering the neighborhood from the north on Entry Drive from Serramonte Boulevard, residents and visitors are greeted by a tree-lined gateway of flowering trees in a planted median and along the sidewalk, while a vibrant public plaza welcomes pedestrians. The south entrance at Campus Drive features a landscaped round-about marking the entry into the new neighborhood.

Figure 5.2 Planting Plan



PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE	QTY
TREES							
T-1		ACER BUERGERANUM	TRIDENT MAPLE	24" BOX	PER PLAN	M	10
T-2		ACER X FREEMANII AUTUMN BLAZE	AUTUMN BLAZE FREEMAN MAPLE	24" BOX	PER PLAN	M	31
T-3		ACER MACROPHYLLUM	BIG LEAF MAPLE	24" BOX	PER PLAN	M	6
T-4		ARBUTUS 'MARINA'	MARINA STRAWBERRY TREE	24" BOX	PER PLAN	L	14
T-5		CERCIS 'FOREST PANSY'	FOREST PANSY REBUD	24" BOX	PER PLAN	M	17

PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE	QTY
TREES							
T-6		CERCIS OCCIDENTALIS	WESTERN REDBUD	24" BOX	PER PLAN	M	3
T-7		CUPRESSUS MACROCARPA	MONTEREY CYPRESS	24" BOX	PER PLAN	L	13
T-8		GINKGO 'PRINCETON SENTRY'	MAIDENHAIR TREE	24" BOX	PER PLAN	M	16
T-9		HYMENOSPORUM FLAVUM	SWEETSHADE	24" BOX	PER PLAN	L	16
T-10		KOELREUTERIA PANICULATA 'FASTIGIATA'	GOLDENRAIN TREE	24" BOX	PER PLAN	L	1

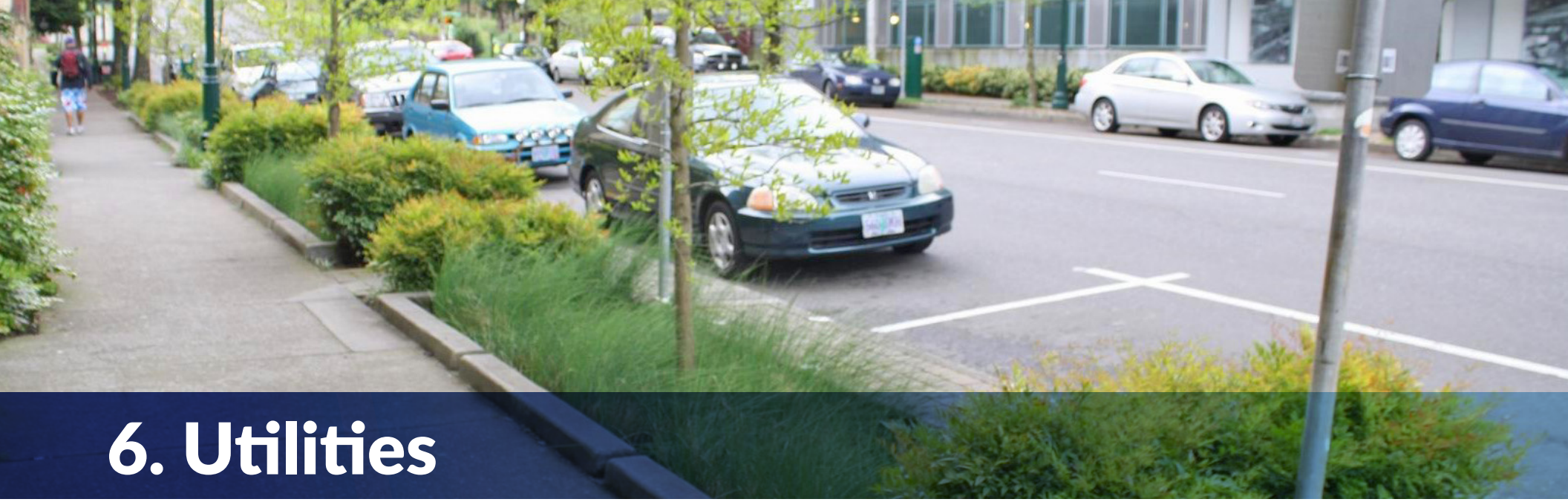
PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE	QTY
TREES							
T-11		LAGUNARIA PATERSONII	NORFOLK ISLAND HIBISCUS	24" BOX	PER PLAN	M	13
T-12		LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX	PER PLAN	L	34
T-13		LYONOTHAMNUS FLORIBUNDUS	CATALINA IRONWOOD	24" BOX	PER PLAN	L	6
T-14		MELALEUCA QUINQUENERVIA	SEJEPUT TREE	24" BOX	PER PLAN	M	4
T-15		OLEA EUROPEA 'SWAN HILL'	OLIVE TREE	24" BOX	PER PLAN	L	10

PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE	QTY
TREES							
T-16		PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	PER PLAN	L	2
T-17		QUERCUS AGRIFOLIA	EVERGREEN OAK TREE	24" BOX	PER PLAN	L	13
T-18		QUERCUS SUBER	CORK OAK	24" BOX	PER PLAN	L	3
T-19		SEQUOIA SEMPERVIRENS	COAST REDWOOD	24" BOX	PER PLAN	L	13
T-20		TRISTANIOPSIS LAURINA	WATER GUM	24" BOX	PER PLAN	L	19

Table 5.1 - Recommended Tree Species for public streets and open spaces within the Precise Plan			
Forested Hillsides (Tree Succession Species)		**Streets & Parks**	
Species	**Common Name**	**Species**	**Common Name**
Aesculus californica	California Buckeye	*Acer buergeranum*	Trident Maple
Acer macrophyllum	Big Leaf Maple	*Acer x freemanii 'Autumn Blaze'*	Autumn Blaze Maple
Arbutus menziesii	Pacific Madrone	*Acer Macrophyllum*	Big Leaf Maple
Calocedrus decurrens	Incense Cedar	*Arbutus 'Marina'*	Strawberry Tree
Ceanothus 'Ray Hartman'	Wild Lilac	*Cercis 'Forest Pansy'*	Forest Pansy Rebud
Hesperocyparis macrocarpa	Monterey Cypress	*Cercis occidentalis*	Western Redbud
Fremontodendron californicum	Fremontia	*Cupressus macrocarpa*	Monterey Cypress
		Ginkgo 'Princeton Sentry	Maidenhair Tree
		Hymenosporum flavum	Sweetshade
		Koelreuteria paniculata 'Fastigiata'	Goldenrain Tree
		Lagunaria pattersonii	Primrose Tree
		Lophostemon confertus	Brisbane Box
		Lyonothamnus floribundus	Catalina Ironwood
		Melaleuca quinquenervia	Cajeput Tree
		Olea europea 'Swan Hill'	Fruitless Olive
		Pistacia chinensis	Chinese Pistache
		Quercus agrifolia	Coast Live Oak
		Quercus suber	Cork Oak
		Sequoia sempervirens	Coast Redwood
		Tristaniopsis laurina 'Elegant'	Water Gum



6. Utilities

Plan Area utility infrastructure is for stormwater, sanitary sewage and water supply and distribution. Dry utilities systems are for power, natural gas, and communications.

A. STORMWATER

Existing and planned stormwater system flows are for the 18.4-acre Plan Area not including Parcel A. Refer to Appendix C for Precise Plan storm water plans.

Existing Conditions

The site is bound by Serramonte Boulevard to the north, Callan Boulevard to the east, Campus Drive to the south and residential buildings to the west. Post school closure uses on the campus include a bus yard, district offices, churches, child day care facilities, a Comcast building, and the recently completed Faculty and Staff housing. Faculty and Staff Housing (including the apartments, car barn, and surface parking lot located west of the apartments) and the Comcast building will remain operational throughout and after construction of the Precise Plan. The Faculty and Staff Housing was approved separately and storm water improvements for the building, surface parking lot and area immediately adjacent to the building will not be modified as part of this Precise Plan. The driveway

just to the south of the Faculty and Staff Housing will be replaced and is included in the plan.

Existing ground coverage consists of approximately 108,830 sq. ft. impervious and 59,440 sq. ft. pervious surfaces (64.7% impervious). Site elevations vary from approximately elevation 495 feet to the west and 480 at the main parking lot near the entrance to the site. Stormwater onsite is collected in area drains or inlets and conveyed in below grade pipes to two storm drain outfalls located around the perimeter of the project. The first outfall is located in the existing parking lot near the main vehicular entrance at Serramonte Boulevard. The outfall discharges to an existing 24" storm drain main in Serramonte Boulevard that flows to the east. The second outfall is located near the southeast corner of the plan area and discharges to an existing 27" storm drain main in Callan Boulevard.

Planned System

The Plan Area's stormwater drainage system generally maintains existing drainage patterns and replaces the existing drainage system on site. The system is designed to not increase the peak flow rate of stormwater leaving the site to the City's storm drainage system during the design rainfall event to a level greater than existing, pre-construction conditions.

The proposed changes in the Plan Area consist of open space, parks, landscape areas, concrete paths, private roadways, asphalt drives, asphalt parking lots, and multi-story residential buildings.

The proposed drainage system will consist of area drains, drop inlets, manholes, stormwater treatment areas with overflow structures, and below grade pipes. The drainage system will convey runoff to the existing outfalls located near the main vehicular entrance and the southwest corner of the site.

The proposed ground coverage consists of approximately 120,300 sq. ft. impervious and 47,970 sq. ft. pervious surfaces (71.5% impervious). The Plan Area will increase the amount of impervious surface from the existing condition and will require retention to control the peak flow and volume leaving the site. Overall, the proposed condition will increase the site's impervious footprint by approximately 11,470 sq. ft. and will therefore require stormwater retention.

The Plan Area proposes to satisfy the retention requirement with a Master Plan approach that will allow one parcel to overcompensate and accrue credits that can be applied to other parcels that will have more difficulty meeting the requirement.

Although the sequence of the development is flexible, at no time in the development process will the Plan Area increase the peak rate of stormwater runoff leaving the site at any phase of the project to a level greater than pre-construction conditions.

For each phase of development, pre- and post-construction areas of impervious surfaces will be calculated within the phase limits to determine if there will be an increase in the peak runoff rate. If there is a calculated increase in peak runoff rate, a temporary stormwater detention system such as a detention basin or below-grade detention pipe would be located within the footprint of undeveloped parcels, to be replaced with the project's on-site, below grade stormwater detention system at Overlook Park. The Overlook Park system is designed to satisfy detaining peak flows for new development in excess of existing conditions.

Stormwater Requirements

The Plan Area will not increase the flow or volume leaving the site for the design storm. If a development project proposes to increase the impervious area of a development parcel, stormwater retention will be required to retain the increased flow and volume. Each phase of development will conform to stormwater treatment requirements. Stormwater treatment requirements for the buildings will be met on each individual lot. Stormwater treatment requirements for the streets will be met with best management practices (BMPs) located in the private roadways or in temporary stormwater treatment facilities located within the footprint of undeveloped parcels, to be replaced with on-street BMP as streets are built out in the Precise Plan area.

B. SANITARY SEWER

Existing Condition

The existing City sewer system in the vicinity of the Plan Area consists of a 10-inch sewer main in Serramonte Boulevard, 8-inch and 10-inch sewer mains that run through the Plan Area, an 8-inch sewer main in Campus Drive south of the school site, and a 6-inch sewer main in Callan Boulevard. A portion of the existing sewer system that runs through the District's property connects the 8-inch main in Campus Drive to the 10-inch main in Serramonte Boulevard. Sewer generated by Faculty and Staff housing and the existing school site discharge into the main that runs through the Plan Area, which ultimately connects to the 10-inch main in Serramonte Boulevard. Elevations and sizes of the existing system are from field and record data. Rim and invert elevations are obtained from field data with elevations based on North American Vertical Datum (NAVD 88).

Planned System

The Precise Plan will construct a public sewer system in the private street (to be located in an easement) and an on-site (within each development parcel) sewer system to connect the buildings to the public sewer system. The planned sewer system will consist of manholes and pipes. The onsite sewer system consists of pipes, cleanouts, and manholes. The Plan Area will connect to the 10-inch sanitary sewer main in Serramonte Blvd at Entry Drive and the new sewer connection on Callan Boulevard. Refer to Appendix C for Precise Plan sewer system plans.

Sewage Generation Calculations

The City of Daly City establishes sewage demand numbers for different types of building uses based on the demands provided in the City's 2009 Master Sewer Study. The Plan area will replace the existing buildings, including an existing school building and modular units. The sewage generation flows from the buildings to be removed will be applied as a credit to the project. This information will be used by the City to determine the impacts the proposed project will have on the City's sewer system and determine if the existing sewer system has sufficient capacity to serve the project. Despite the credit, the City is anticipated to experience an increase of sewer flows of 173,468 gpd. A detailed sewer study is included in the entitlement documents.

C. WATER SUPPLY

Existing Condition

The existing City water system in the vicinity of the project consists of a 6-inch AC water main in Serramonte Boulevard and a 10-inch water main in Entry Drive constructed with the high school project. The existing domestic water system for the school campus is fed by a 3-inch service near the main entrance off Serramonte Boulevard while the existing fire service for the site is served from an 8-inch line from Callan Boulevard. The existing Faculty & Staff Housing project is served from the existing 10-inch main.

Planned System

The Precise Plan will construct a new public water main within a public easement within the new streets and provide new domestic water, fire water, and irrigation water services to the proposed buildings. Planned services are to be fed from a portion of the existing 10-inch main constructed as part of the Faculty and Staff Housing and a new 10-inch water main constructed with the new private streets. The on-site (within each development parcel) domestic water system will consist of service lines from the public main to each building. Refer to Appendix C for Precise Plan water system plans.

D. DRY UTILITIES

Dry utility infrastructure modifications and additions will be required and will be built in phases to accommodate the development. Utility providers serving the Plan Area include PG&E, Comcast, and AT&T. PG&E recently installed infrastructure to serve Parcel A and maintains service to the existing Comcast Building and high school building. Data/Telecom services were also extended to serve the Faculty & Staff Housing project. A joint trench will be provided in the private streets to extend the utility providers' infrastructure throughout the development to serve the development parcels. Dry utilities will be coordinated with the appropriate utility provider to establish new service routes to support the Plan Area. Refer to Appendix C for Precise Plan dry utility plans.

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7. Implementation

A. PHASING

The Plan Area is to be built-out in phases. For each phase of development there are corresponding street, park, open space improvements and utilities necessary to support development of individual parcels per Table 7.1 and as shown in Figure 7.1.

The number of phases, number of units, and timeline for the project will ultimately depend on market conditions. The pace of development will fluctuate with the regional economy, capital expectations and availability, costs for development and the conditions of the Daly City housing market.

The chronology of phasing in Table 7.1 is not binding. For the purposes of assessing consistency with the Table 7.1 for Conformance Review, a reviewer shall assess solely whether development of a proposed project includes the streets and parks and open space plan elements in Table 7.1.

Figure 7.1 Phasing

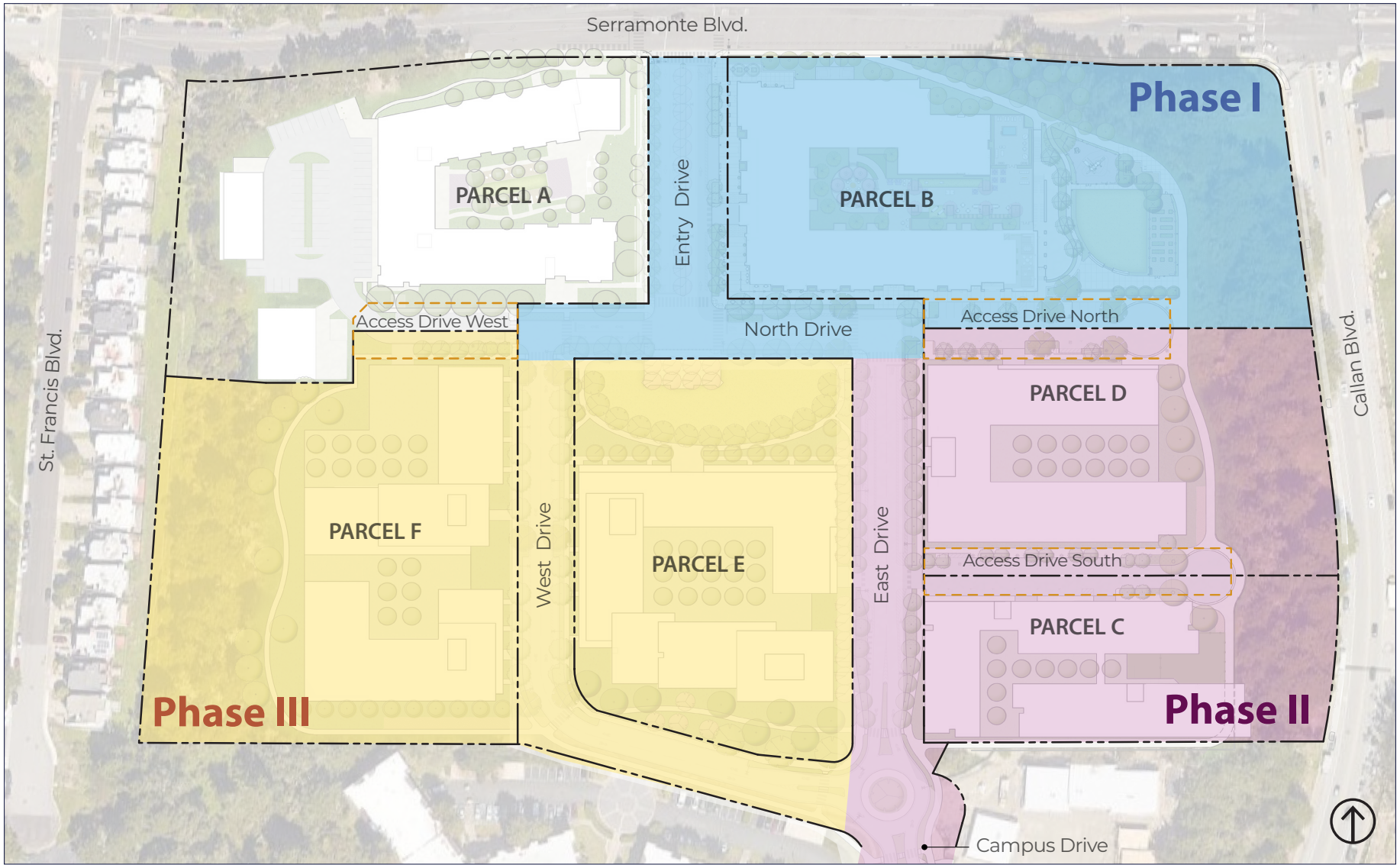


Table 7.1 Phasing of Parcels and Plan Elements

Phase	Parcels	Streets	Parks and Open Space
1	**B Including retail***	▪ Entry Drive ▪ North Drive ▪ North side of North Access Way**	Entry Drive Plaza, Overlook Park, Eastside Recreation Trail within parcel
2	**C Including Head Start*****	▪ If Parcel C before Parcel D: East Drive from Campus Drive to South Access Way ▪ South Access Way	Eastside Recreation Trail within parcel
	D*	▪ East Drive from North Access way to South Access way ▪ South side of North Access Way	Eastside Recreation Trail within parcel
3	**E**	▪ West Drive from North Drive to Campus Drive (whichever parcel is built first)	Central Green & South Point Park
	F	▪ West Drive from North Drive to Campus Drive (whichever parcel is built first)	Westside Walking Trail

* Callan Boulevard frontage improvements within parcel.

** North side of North Access Way includes a two-way travel way up to eastern end of on street parking on north side of street and pavement to access way along eastside of Parcel D, until the time that Parcel D is built..

*** The Head Start facility may be located on other parcels.

Notes:

1. If Parcel E is built before Parcels C and D, then East Drive and North Drive will be constructed including the roundabout.
2. If Parcel F is built before Parcels C. D and E, then West Drive and the roundabout will be constructed.
3. Serramonte Boulevard and Highway 1 ramp intersection improvements will be constructed with the first market rate development per the Development Agreement.
4. Bike lanes on Campus Drive to Hickey Blvd will be constructed concurrent with the roundabout.
5. See Development Agreement for timing of additional off-site improvements.
6. A Storm Drain Memo shall be submitted for conformance review for each phase in accordance with the Master Plan Drainage Memo. At Building Permit submittal: a Hydrology & Hydraulics report based on final design will be provided with the Building Permit submittal in accordance with the Master Plan Drainage Memo.

B. ENTITLEMENT DOCUMENTS

Precise Plan entitlement documents are:

- **General Plan Amendment**. By Resolution No. [], City Council approved text and map amendments to the General Plan to enable high density residential and mixed-use residential development.
- **Precise Plan**. By Resolution No. [], City Council approved the Serramonte Del Rey Precise Plan, which modified land use designations and created a new street and open space network.
- **Development Agreement**. The District and the City of Daly City entered into a Development Agreement to secure vested development rights and terms.
- **Affordable Housing Agreement**. The District and the City of Daly City entered into an Affordable Housing Agreement to secure rights and terms for the Project's Affordable Housing Plan.
- **Tentative Map and Conditions of Approval**. The City Council approved a Tentative Map indicating the subdivision of the District lands into parcels with infrastructure and open space improvements, including Conditions of Approval.
- **Mitigation and Monitoring and Reporting Program**. The City of Daly City, as the lead agency under the California Environmental Quality Act (CEQA) prepared the project's Environmental Impact Report (EIR) to disclose to the City, public and other agencies the environmental impacts of the project. By Resolution No. [] the City certified the EIR for the project, adopted findings, statement of overriding considerations [if needed] and a Mitigation Monitoring and Reporting Program (MMRP). The Precise Plan is consistent with and will implement the MMRP as approved by the City Council.
- The term "Entitlement Documents" shall refer to all of the above entitlements except the Precise Plan.

C. CONFORMANCE AND DESIGN REVIEW

Purpose

This section establishes the process for Conformance and Design Review for proposed projects governed by the Serramonte Del Rey Precise Plan. The purpose of Conformance Review and Design Review is to streamline approvals and expedite permit processing of projects consistent with the Precise Plan and Entitlement Documents.

Review Process and Timing

Conformance Review and Design Review shall be conducted per the following process and timing requirements:

1. Pre-application conference. Upon request of the Applicant, the Planning Manager shall convene a pre-application conference to review the scope of the project, submittal requirements, conformance and design review process, timeline, and staff availability. It is an opportunity for the Applicant and their design team to hear project requirements and ask technical questions to prepare a submittal. The City Engineer, design review consultant, and Development Coordinating Committee members shall attend upon request. The Development Coordinating Committee shall be composed of representatives of any City or other Local Departments responsible for providing permits or infrastructure to the project that is the subject of an application.

2. Submittal. The Applicant shall submit plans, exhibits, maps and supporting documentation as described by submittal requirements below. The submittal shall include a completed Conformance Review and Design Review Check List, as attached to this Section as Appendix A, and additional pertinent documentation as requested by the Planning Manager in the pre-application conference.

3. Review Process. The Planning Manager and designated staff or third-party consultants shall conduct the Conformance Review and Design Review per the roles and responsibilities described below. The Planning Manager shall coordinate and collate any reviewer comments and provide them to the Applicant no later than 45 business days after filing a project submittal. Notwithstanding anything in this chapter, to the extent the Permit Streamlining Act or other State Law applies, the regulations in such laws shall govern.

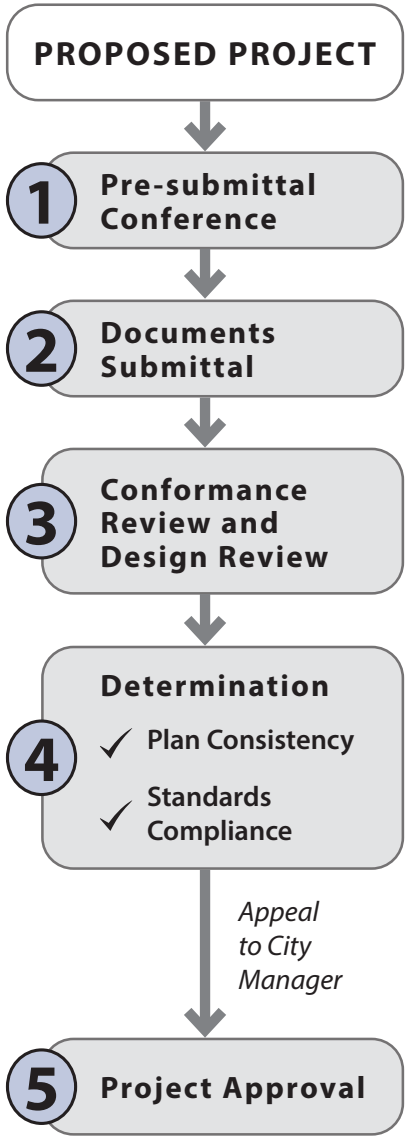
4. Determination. Upon receiving a revised project submittal from the Applicant, the Planning Manager shall complete the conformance review and/or design review as required in this chapter. For Conformance Review, the Planning Manager shall make a determination of plan

consistency and standards compliance and, for Design Review, the Planning Manager shall make a determination of standards compliance.

5. Approval. The Planning Manager shall communicate in writing to the Applicant with the determination of approved-as-of right, approved with conditions, or denied based on necessary findings. Total City Review Time from submittal to determination shall not exceed 90 business days. For the purpose of this paragraph, "City Review Time" shall mean the time period, measured in business days, taken by the City to review a project submittal and provide comments to the applicant or render a Conformance Review and Design Review decision. City Review Time does not include the Applicant's time from the date of receiving comments to the date of resubmitting a revised project submittal responsive to comments.

A Conformance Review or Design Review determination or interpretation may be appealed within 20 business days to the City Manager by the Applicant. City Manager shall make a determination within 20 business days of receipt of the appeal. The City Manager's decision on appeal shall be final and not appealable.

Figure 7.2 Conformance Review and Approval Process



If the City fails to complete Conformance Review and Design Review per the above timing requirements, the submittal shall be deemed to be conforming with the Precise Plan and Entitlement Documents, planning review shall be complete, and requested permits shall be issued.

Staffing

The Planning Manager shall check on staff availability prior to the pre-Application conference to identify staff availability to meet the conformance and design review timeline. If adequate staffing is not available, qualified third-party consultants can be contracted for Design Review and/or Conformance Review. Any such consultants shall have architectural, landscape, planning and urban design expertise, including professional planning experience on similar projects. The City can designate a third-party consultant to be paid for by Applicant, or the Applicant can select a third-party consultant, subject to City staff approval. The City or the Applicant can also contract with other third-party consultants to support staff on Conformance and Design Review, subject to City staff approval. The Applicant shall pay all reasonable staff coordination and third-party consultant costs for Conformance and Design Review. Any third-party consultants shall provide recommendations for a Design Review or Conformance Review determination, including any comments to the Applicant as appropriate. The ultimate determination on Conformance Review and Design Review shall be made by the Planning Manager after considering any recommendations of third-party consultants.

Responsibilities

The Planning Manager shall provide oversight of the Conformance Review and Design Review process, and shall make all determinations of Conformance and Design Review. The Planning Manager, third-party design review consultant, City Engineer, Development Coordinating Committee member, other third-party reviewers, or planning staff shall have the responsibilities as shown in table 7.2.

Table 7.2 Reviewer Responsibilities

Application	Responsibility		Reviewer					
	Plan Consistency	Standards Compliance	Planning Manager	Staff Or Third-Party Consultant (If Retained)	Design Review Consultant	City Engineer	Development Coordinating Committee[1]	Housing And Community Development Manager
Conformance Review		Land Use and Urban Design	X	X	X			
	Phasing		X			X		
	Parks		X	X	X			
	Streets		X	X	X	X		
	Utilities, Off-Site Transportation Improvements		X			X	X	
	Development Agreement		X					
	Final Map					X		
	MMRP		X			X	X	
	Inclusionary Housing Agreement							X
	Tentative Map and Conditions of Approval		X		X	X		
Design Review		New Buildings	X	X	X			
		Parks	X	X	X			
		Streetscapes	X	X	X			
		Exceptional Projects[2]	X	X	X	X	X	X
		Minor Modifications to Existing Buildings & Facilities	X	X	X	X		

1 Development Coordinating Committee includes Planning Division, Building Division, Engineering Division, Department of Water and Wastewater Resources, North County Fire Authority and other committee members as deemed appropriate by the Planning Manager.

2 For exceptional projects, Planning Manager to determine at pre-application conference what the type of review and staffing is required.

Conformance Review

Scope of Review

Conformance Review assesses a proposed project's plan consistency and standards compliance with the Precise Plan and Entitlement Documents. What follows are the considerations that shall guide this review process.

Plan Consistency Review

Plan consistency review focuses on confirming a development proposal's consistency with the Precise Plan's vision, goals and associated park, open space, street and public improvements linked by phase of development (as identified in Section A of this Chapter).

Plan consistency review of infrastructure, i.e. review of the location, extent and capacity of streets, water, storm drainage, wastewater, utilities, fire access, and on and off-site transportation improvements needed to support land uses, shall be conducted by the Planning Manager, City Engineer and/or appropriate member of the Development Coordinating Committee, as requested by the Planning Manager. The scope of improvements associated with a development parcel shall be consistent with Section A of this Chapter and exhibits in Appendix A.

Plan consistency review also shall assess a proposed project's consistency with objective criteria in the Entitlement Documents. Review of the Entitlement Documents shall be conducted per Table 7.2.

Standards Compliance Review

Standards compliance assesses a project's conformance with the Precise Plan's objective development standards regarding land use and urban design for permitted land uses, development density, building heights, street frontages, ground floor use and setbacks, as set forth in Section A of Chapter 3 of the Precise Plan.

Submittal Requirements

Submittal requirements shall include the maps and supporting information as set forth in the 2023 Daly City Municipal Code Section 17.28.030 C. 2. (a) – (f), Procedure for Application for Planned Development of the Daly City Zoning Ordinance, and shall include any further information requested by the Planning Manager. This Municipal Code section is included as a part of Supporting Documents provided with this Precise Plan.

Review Criteria Guidance

The following criteria shall guide the determination of plan consistency and for standards compliance:

- All Figures in the Precise Plan illustrate the general arrangement and relationships among parcels, buildings, streets, accessways, parks and open spaces, and exact

compliance or conformance is not required so long as other objective criteria are met.

- The final configuration of parcels, buildings, streets, accessways, parks and open spaces are subject to refinement through the design and subdivision process, and exact compliance or conformance is not required so long as other objective criteria are met.
- Consistency and conformance with the Precise Plan shall be construed liberally, and shall accommodate unforeseen solutions or innovation that can occur over the extended build-out of the Precise Plan as follows:. Any deviation of 20 percent or less from any objective numerical development standard set forth in Section A of Chapter 3 of the Precise Plan shall be considered consistent and conforming with standards and other requirements in the Precise Plan and Entitlement Documents.

Process

The reviewers, in accordance with the roles set forth in Table 7.2, shall compare the project application, including the Applicant's Conformance Check List, with the applicable plan elements, development standards and requirements of the Precise Plan and the Entitlement Documents, in accordance with the Scope of Review set forth above.

Reviewers shall provide written comments on Plan consistency to the Planning Manager. In the case where the reviewer concludes inconsistency with plan elements, or non-compliance to objective development standards, the reviewer shall identify specific objective project elements to be addressed in a revised submittal to achieve a consistency determination.

The Planning Manager shall coordinate and provide the comments to the Applicant. If requested by the Applicant, the Planning Manager and any reviewers shall meet with the Applicant to discuss steps to resolve any comments. The Planning Manager, upon receipt of a revised submittal, shall meet with comment reviewers, and the Applicant if requested, to confirm resolution of any comments.

The Planning Manager shall consider the recommendations of the reviewers, and shall make the final determination for approval, approval with conditions, or denial of the submittal based on objective criteria as set forth herein.

The nature of the Objective Standards is such that consistency determinations shall be ministerial, without the exercise of discretion. Accordingly, it is not anticipated there will be cause for interpretation of these standards by the City. In the unforeseen event that interpretation is

required, the Planning Manager shall make any interpretation of the Precise Plan's development standards required to evaluate the proposed project, and shall inform the reviewer of any interpretations as needed. The Planning Manager shall include any interpretations as part of its written determination of consistency with the objective development standards of the Precise Plan.

Design Review

Submittal Requirements

Submittal requirements shall include the maps and supporting information as set forth in the 2023 Daly City Municipal Code Chapter 17.45, governing Design Review, and shall include any further information as requested by the Planning Manager.

Scope of Review for New Buildings

Design review for new buildings shall focus on compliance with objective architectural design, parking and loading, private open space, landscape, signage, and lighting design standards, as set forth in Section B-G of Chapter 3 of the Precise Plan.

The design reviewer shall compare the project application, including the Applicant's Conformance Check List and Design Review Check List, with the design standards in the Precise Plan identified above. Appendix B provides examples of compliant and non-compliant buildings for reference. Projects that that vary, in minor ways, from the Precise Plan's objective design standards for buildings, landscape, park and open space and public improvements, shall be deemed consistent with the Precise Plan.

Scope of Review for Park and Streetscape Improvements

For the design review of new park, open space, and streetscape improvements, the design reviewer shall compare the proposed project to the design elements described in the Park and Open Space and Circulation sections of the Precise Plan, and the applicable objective design standards set forth in Section B-G of Chapter 3 of the Precise Plan.

Process

The reviewers, in accordance with the roles set forth in Table 7.2, shall provide written comments on Design Review to the Planning Manager. In the case where the reviewer concludes there is an inconsistency with objective architectural design, parking and loading, private open space, landscape, signage and lighting design standards, the reviewer shall identify specific project elements to be addressed in a revised submittal to achieve a consistency determination.

The Planning Manager shall coordinate and provide the comments to the Applicant. If requested by the Applicant, the Planning Manager and any reviewers shall meet with the Applicant to discuss steps to resolve any comments. The Planning Manager, upon receipt of a revised submittal, shall meet with comment reviewers, and the Applicant if requested, to confirm resolution of any comments.

The Planning Manager shall consider the recommendations of the reviewers, and shall make the final determination for approval, approval with conditions, or denial of the submittal based on objective criteria as set forth herein.

The nature of the objective standards is such that consistency determinations shall be ministerial, without the exercise of discretion. Accordingly, it is not anticipated there will be cause for interpretation of these standards by the City. In the unforeseen event that interpretation is required, the Planning Manager shall make any interpretation of the Precise Plan's design standards required to evaluate the proposed project and shall inform the reviewer of any interpretations as needed. The Planning Manager shall include any interpretations as part of its written determination of consistency with the objective design standards of the Precise Plan.

D. EXCEPTIONAL PROJECTS

The City recognizes the need for flexibility in the implementation of the Precise Plan, and that a proposed project under the Precise Plan may need to deviate from objective development standards set forth in the Precise Plan to better achieve the goals of the Precise Plan.

A proposed project shall be considered an "Exceptional Project" by any of the following:

- Deviates more than 20 percent from numerical standards in Section A of Chapter 3 of the Precise Plan for any parcel, without exceeding the total number of permitted units in the Precise Plan Area;
- Deviates more than 20 percent from the design standards set forth in Section B-G of Chapter 3 of the Precise Plan; or
- Modifies or reconfigures the pattern of streets, blocks, open space, site layout, public improvements, orientation or location of buildings, as described in the Land Use, Urban Design, Park and Open Space and Circulation sections of the Precise Plan in a manner that is not addressed by another process set forth in this Chapter (e.g., minor modification process).

For an Exceptional Project, the Planning Manager is responsible for making the final determination to approve, approve with conditions, or deny a proposed exceptional project. An Exceptional Project can be approved by the Planning Manager upon making the following findings:

- General design considerations, including site layout, open space, topography, orientation and location of buildings, circulation and parking, setbacks, heights, public safety and other elements have been designed to provide a desirable aesthetic environment consistent with the vision and goals of the Precise Plan.
- General architectural considerations, including the character, scale and quality of the design, the architectural relationship with the site and other buildings, building materials, colors, screening of exterior appurtenances, exterior lighting location of signage and similar elements have been incorporated to insure the compatibility of this development with its design concept and the design character of other adjacent buildings within the Precise Plan area.
- Landscaping has been provided to ensure visual relief, to complement buildings and structures and to provide an attractive environment for the enjoyment of the public.

E. MINOR MODIFICATIONS TO EXISTING BUILDINGS AND FACILITIES

Minor modifications to existing buildings or facilities can be approved administratively and as-of-right by the Planning Manager.

Examples of minor modifications or changes include: modifications to the exterior of approved and built buildings, site layouts, tenant signage, off-street parking, changes to the phasing of development and distribution of private open space. The maintenance and repair of buildings, replacement building components, or landscaping are not considered modifications and are permitted by previous approvals, subject to any necessary building or other ministerial permits.

The Applicant shall have a pre-application meeting with the Planning Manager to identify submittal documentation for minor modifications. The Applicant shall submit with the application a cover letter describing the minor modifications, and how they are consistent with applicable objective standards. Upon receipt of the submittal documents and cover letter, the Planning Manager shall review and approve, conditional approve or deny the application within 10 business days. The Planning Manager shall contact the Applicant and provide written documentation of the decision to the Applicant.

Minor modifications, upon approval of the Planning Manager, are deemed consistent to a project's already approved Conformance Review determination and compliant with objective design standards of the Precise Plan.

F. DETERMINATION

Notwithstanding anything else in the Precise Plan, and for purposes of clarification, the following provisions govern Conformance Review, Design Review, and the approval of Exceptional Projects.

Projects consistent with objective standards and requirements of the Precise Plan, as determined through Conformance Review and Design Review, are approved as-of-right.

For an Exceptional Project, the Planning Manager shall make a final written determination to approve, approve with conditions, or deny the application based on necessary findings, as identified in Section F of this Chapter. In approving Conformance Review and Design Review for an Exceptional Project, the Planning Manager has the authority to impose conditions to ensure design and architectural features meet the findings criteria set forth in Section F.

The Planning Manager has the authority to deny Design Review approval for an Exceptional Project, if findings cannot be made to approve, or approve with conditions for the project.

If, after Conformance Review or Design Review, the Planning Manager deems a project application inconsistent and non-compliant with the Precise Plan, prior to a decision to deny approval of the proposed project, the Planning Manager shall provide the Applicant with written documentation as to what elements of the submittal are not in conformance, and provide written suggestions for changes to the proposed project to allow for reconsideration of Conformance and Design Review. This process is separate and independent from the Planning Manager's coordination and provision of any reviewer comments on the Applicant's initial project submittal, as required under the "Review Process and Timing" section of this Chapter.

The Planning Manager shall provide written notification to the Applicant of the Planning Manager's final determination, including design review findings and conformance analysis.

G. PROCESS FOR AMENDING THE PRECISE PLAN

An applicant can request an amendment to the Precise Plan as part of future development application. The applicant shall provide a narrative describing the requested change, a rationale for why the change is needed and how the change will achieve the design intent of the Precise Plan. Amending the Precise Plan shall follow the requirements of the Daly City Municipal Code section 17.28.020 (I) as of the date of approval of the Precise Plan. This Municipal Code section is included as a part of Supporting Documents provided with this Precise Plan.

H. CALIFORNIA ENVIRONMENTAL QUALITY ACT

All proposals for development shall be subject to the mitigation measures specified in the Environmental Impact Report (EIR) certified by the City Council as part of this Precise Plan. Subsequent environmental review of development of Phase I, Phase II, or future phases of development shall be reviewed for compliance with the EIR and MMRP prepared for this Precise Plan and the California Environmental Quality Act.

Appendix A: Conformance Checklist (Section A) and Design Review Checklist (Section B - G)

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Land use	LU	N/A	Permitted Land Use (see Table 3.1 Permitted Land Uses)		
Land use	LU	N/A	Density (see Table 3.2 Anticipated Development)		
Land use	LU	N/A	Maximum development by parcel (see Table 3.3 Development Maximum per Parcel)		
Height	A	N/A	Building height (see Figure 3.3 Building Heights)		
Height	A	1.1	Ornamental architectural features, such as turrets, parapets, corner towers, or other accentuating features.		
Height	A	1.2	Mechanical and roof-mounted elevator core equipment up to a maximum of 18 feet above maximum height, provided their combined coverage does not exceed 30% of building roof area. Equipment less than 4 feet above maximum height is exempt from the coverage calculation.		
Height	A	1.3	Architectural and landscape screening designed to conceal mechanical and roof mounted equipment.		
Height	A	1.4	Sustainability elements, such as photovoltaic cells, small-scale wind turbines suitable for residential development, storm water catchment / treatment equipment, solar water heating equipment.		
Height	A	1.5	Enclosed amenity spaces to a height of 12 ft where roof is designed as an accessible outdoor common area if coverage of enclosed amenity space is no more than 20% of building roof area.		
Building Frontage/ Build-to-line	A	2.1	The building frontage on all parcels shall comply with the percentage of building that is required to be aligned along the build-to-line, as shown in Figure 3.4 Street Frontage.		
Building Frontage/ Build-to-line	A	2.2	The primary wall of a building shall align with the build-to line. The primary wall can be located up to 6 feet from a build-to-line. Ground floor building frontages may be recessed from the build-to line.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Building Frontage/ Build-to-line	A	2.3	Balconies and other projections above 16’ from ground level may encroach across the build-to line up to 6 feet.		
Building Frontage/ Build-to-line	A	2.4	Building entry canopies, arcades, and galleries with a height no greater than 16 feet may encroach up to 15 feet across the build-to-line.		
Building Frontage/ Build-to-line	A	2.5	Stairs to podium level courtyards overlooking parks, stoops, and appropriate fencing can encroach up to 10’ on the park side of a build-to line.		
Ground floor use	A	N/A	Location, type and orientation of ground floor uses shall comply with Figure 3.5 Ground Floor Use.		
Ground floor use	A	3.1	No more than one 24’ wide vehicle access driveway or two 12’ wide vehicle access driveways are permitted. Loading docks are not permitted at active ground floor use frontages.		
Ground floor use	A	3.2	Blank walls or walls opening to structured parking areas at the ground floor are limited to 30’ maximum.		
Setbacks	A	N/A	The perimeter of the Plan Area shall have minimum setbacks that comply with Table 3.5 Setbacks.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Architectural character	B	1.1	Buildings shall be of high quality, contemporary architectural design. Contemporary architectural design is 21st century design: it reflects current trends in architecture. Contemporary architectural design does not adhere to a particular style of set of standards; rather, it seeks to distinguish itself from the past by incorporating the latest innovations in building technology and design.		
Architectural character	B	1.2	Buildings shall not directly reference historic architectural styles or use materials associated with specific periods or styles.		
Architectural character	B	1.3	Avoid the use of terracotta tile roofing, mansard roofs, asphalt roof tiles or shingles.		
Architectural	B	1.4	Avoid ribbon windows and flat building facades.		
Architectural character	B	1.5	Avoid auto-oriented ground floor building design, such as continuous, open to the street, at grade covered parking spaces and extended curb cuts.		
Proportion	B	1.6	The size of the pedestrian, podium and tower levels shall be in proportion to one another.		
Proportion	B	1.7	Avoid visual discord due to the mixing of too many differently shaped and sized building elements, forms, colors, or textures.		
Proportion	B	1.8	Avoid random, oversized building elements.		
Pedestrian level massing	B	2.1	To create a pedestrian level setback for active uses with occupied floor above, pedestrian level façade setbacks from the build-to-line shall not exceed 10 feet.		
Pedestrian level massing	B	2.2	Where Active Uses or Required Building Entry, Lobby or Residential Amenity Space uses are required, the minimum floor-to-floor height for the ground floor is 16 feet.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Podium level massing	B	2.3	The first one to three levels of all buildings shall be differentiated from the upper floor to provide a visual support for the floors above. They shall have high quality materials appropriate for a pedestrian environment.		
Podium level massing	B	2.4	Stepbacks are required as shown on Figure 3.3 Building Heights. Where required, stepbacks shall be no higher than 65' above grade with the building set back no less than six feet from the street wall.		
Tower level massing	B	2.5	Tower massing to extend to ground level to visually anchor the tower to the ground.		
Tower level massing	B	2.6	Towers extending to ground shall be set back 10 feet minimum from the build-to line.		
Tower level massing	B	2.7	Towers shall be oriented in an east-west direction to minimize impacts to views from residences along Saint Francis Boulevard.		
Tower level massing	B	2.8	Each tower shall not exceed a massing envelope of 240 feet long by 150 feet wide.		
Tower level massing	B	2.9	A minimum separation of 60 feet is required between any two towers or portions of skyline level building massing.		
Tower level massing	B	2.10	Towers are not permitted adjacent to the central open space.		
Façade modulation	B	3.1	Long continuous facades that extend the length of a parcel or city block are to be avoided. Buildings over 100 feet in width require vertical breaks in building massing in the form of projections and recesses to reduce the overall scale of the building.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Façade modulation	B	3.2	Occupiable projections, such as balconies or bay windows, are permitted to project up to six feet from building face above streets and open spaces above the pedestrian level. The recess or projection shall be a minimum of 3 feet in depth.		
Façade modulation	B	3.3	The façade shall be divided into segments of 30 to 50 feet in width using one of the design approaches below: - Vertical shifts - Balconies or bay windows - Corner expression - Volumetric recesses (including balconies) - Volumetric projections - Change of Material: to achieve modulation by a change of material, the material change must occur for at least 20% of the façade and must change in plane at least 18 inches in depth from the facade.		
Fenestration	B	3.4	Building fenestration shall incorporate recessed and/or projecting window bays, balconies, canopies, and architectural elements, contrasting surfaces, and/or a rhythm to the building's light and shadow.		
Fenestration	B	3.5	Avoid featureless expanses of fenestration that eliminate a sense of human scale.		
Blank facades	B	3.6	Blank facades are to be avoided at building walls facing public spaces or streets.		
Blank facades	B	3.7	At the ground floor, blank facades longer than 50 feet should provide landscaping or public art.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Ground floor design	B	3.8	Transparent windows, storefronts, show windows, building entries, dwelling entries, and/or other active uses shall be placed along street and public open space frontages, as required in the Ground Floor Active Frontage standards.		
Ground floor design	B	3.9	Doors or sliding windows shall be used by ground-floor restaurants, eating and beverage services to enable outdoor dining along sidewalks and plazas.		
Entries	B	4.1	Buildings shall have identifiable main entrances that are directly visible and accessible from public rights-of-way. An entry canopy, recessed building volume, a sculptural volume, change in scale or identifiable architectural treatments are acceptable features.		
Entries	B	4.2	In mixed-use buildings, residential entries are to be differentiated from commercial entries.		
Entries	B	4.3	Pedestrian seating and bicycle parking shall be located near building entrances.		
Windows	B	4.4	Upper story windows shall have architectural details, such as sills, or lintels, that recess or project from the facade.		
Windows	B	4.5	Reflective glazing is not permitted.		
Windows	B	4.6	Non-reflective coatings, low-emissivity glass, external shade devices and other elements shall be used.		
Materials and color	B	5.1	Building materials, colors and finishes shall be coordinated to create a visually harmonious color palette appropriate for a family-oriented residential neighborhood, consistent with contemporary building design.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Materials and color	B	5.2	High quality building materials and architectural detailing, with a preference for natural materials at the ground level, shall be used where people directly experience buildings.		
Materials and color	B	5.3	Changes in color, texture or materials shall be used to differentiate architectural elements and building massing.		
Materials and color	B	5.4	Avoid monolithic use of color, where an entire building is one color or tone.		
Materials and color	B	5.5	Avoid garish, or discordant use of color.		
Parking ratios	C	1.1	All parking standards that differ from the Daly City municipal code are designed and necessary to maintain the unity or livability of the Project.		
Parking ratios	C	1.2	Per AB-2097, cities can no longer impose minimum parking requirements on new developments within a half-mile of public transit stops, for which Serramonte Del Rey qualifies. The bill does not prevent property owners from building parking and JUHSD anticipates building the appropriate amount of parking, at their discretion.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Parking ratios	C	1.3	The following parking ratios currently anticipated for Parcels B through F: - Parking ratios are based on current conditions and assumptions. The City and JUHSD acknowledge that future parking demand will be in considerable flux over the lifetime of the Development Agreement, and may increase or decrease significantly. The intent of this approach is to provide adequate parking within the Precise Plan area based on demand as determined by a parking analysis study provided at the Applicant's discretion that will be based on objective analysis, and to minimize parking impacts to on-street parking in the surrounding neighborhood. - The parking ratio assumed for market rate housing is approximately 1.5 spaces per dwelling unit.		
Parking ratios	C	1.4	Parking for pick-up and drop-off for the Head Start Program at Parcel C may be accommodated by on-street parking marked by appropriate signage, with such signage reserving parking spaces for this use during the appropriate hours. Parking for Head Start Program staff can be accommodated with reserved on-street parking designated by appropriate signage.		
Parking ratios	C	1.5	Overflow parking for Parcel A may be accommodated within the Plan Area with surface parking, on-street parking, or within future parking podiums or structures on Parcels B through F. To the extent that JUHSD demonstrates that overflow parking is not needed for a particular development, it will be eliminated as a requirement in the future.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Parking ratios	C	1.6	Residential parking can be accommodated in mechanical puzzle lifts.		
Parking ratios	C	1.7	No more that 10% of residential parking can be tandem, and tandem spaces may only be assigned to users of the same dwelling unit. Tandem units may be designed as either front to rear spaces or mechanical lift spaces (stackers).		
Parking ratios	C	1.9	One bicycle parking stall per unit shall be provided and accessible from street level. Bicycle parking in excess of one stall per unit can be located anywhere on site.		
Design of Off-street parking and loading	C	2.1	Parking shall be located behind, within, or under buildings, or within separate structures. Surface parking areas are prohibited between a building and Entry Drive, North Drive, East Drive and West Drive street frontages.		
Design of Off-street parking and loading	C	2.2	Parking stall and drive aisle dimensions for each parcel may comply with either approach 1 or 2 below, or a combination of both approaches:		
Design of Off-street parking and loading	C	2.2.1	The current City standards for off-street parking (including the ratio of standard spaces to compact spaces) at the time of the Applicant's submittal for conformance review, and/or		
Design of Off-street parking and loading	C	2.2.2	A "Uni-stall" standard size parking space which is based upon a stall dimension of 8' – 6" x 18' – 0", unless constrained by a wall on one or both sides, in which case the minimum stall width will be 9' – 0" minimum. The drive aisle shall maintain a minimum of 24' clear.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Design of Off-street parking and loading	C	2.3	For mixed-use projects, shared parking is encouraged to allow uses with different peak hours of operation to utilize off-street parking facilities of other buildings in the Precise Plan.		
Design of Off-street parking and loading	C	2.4	Loading docks and service areas shall be located at the rear of the development or inside parking structures for parcels deeper than 80 feet, separate from parking areas. For smaller parcels, loading docks and service areas must be located on the side street, wherever possible. Loading zones should not disrupt the flow of traffic within a given project area.		
Design of Off-street parking and loading	C	2.5	Loading docks shall be located on Access Drives North, South, and West. If this is not possible, loading docks may be provided on East, North or West Drive, if enclosed within a building.		
Vehicle and bicycle access	C	3.1	Location of vehicular parking entrances shall be as follows: - Parcel A shall be accessed from Access Drive West. - Parcel B shall be accessed from Serramonte Blvd, Entry Drive or Access Drive North; or any combination of these. - Parcel C shall be accessed from East Drive or Access Drive South, or any combination of these. - Parcel D shall be accessed from East Drive, Access Drive North, Access Drive South; or any combination of these. - Parcel E shall be accessed from East Drive or West Drive; or any combination of these. - Parcel F shall be accessed from West Drive or Access Drive West; or any combination of these.		
Vehicle and bicycle access	C	3.2	Vehicular entries shall be located a minimum of 100 feet from intersections and crosswalks except for driveways located along access ways.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Vehicle and bicycle access	C	3.3	Bicycle access shall be from street level, and not required through garage entrances. Bicycle storage for each building shall be accessible from ground level, as close to the driveway entry as practicable, and clearly signed. Bicycles in excess of one per unit can be stored anywhere on site.		
Vehicle access design	C	4.1	Two-way vehicular entrances designed as a single driveway shall have a maximum width of 24'.		
Vehicle access design	C	4.2	Where a driveway crosses a sidewalk, clearly demarcate the sidewalk across the entire width of the driveway by using colored paving or materials.		
Vehicle access design	C	4.3	On-street parking may be provided in the form of parallel parking or angled parking based on the width of the street.		
Parking structures	C	5.1	Above-ground garages not screened by residential uses shall include façade treatments or screening.		
Parking structures	C	5.2	Parking garages shall be lined with ground floor active uses or residential entries where indicated per street frontage requirements, and designed with building façades that screen structural elements of the garage where not required by street frontage requirements.		
Parking structures	C	5.3	The design of entries to parking garages shall not be more prominent on the building façade than the primary pedestrian entry.		
Parking structures	C	5.4	Above-ground parking garages shall be designed with human scale design elements that complement and do not contrast with buildings and public spaces of the Precise Plan.		
Parking structures	C	5.5	Parcels B, C, D, E, and F may contain above-ground parking garages		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Parking structures	C	5.6	Parking structure lighting shall be designed to avoid direct glare towards adjacent residential buildings.		
Bicycle facilities	C	6.1	Bicycle parking should be in close proximity to building entrances and bicycle routes to for user convenience.		
Bicycle facilities	C	6.2	Bicycle parking shall accommodate a range of bicycle types, including standard bicycles, E-bikes, tandem bicycles, and trailers.		
Bicycle facilities	C	6.3	On-street bicycle parking shall be separated from automobile parking by use of a landscaped buffer or curb.		
Bicycle facilities	C	6.4	Off-street bicycle parking shall be in secure locations in each building in the Precise Plan area.		
Common open space	D	1.1	Buildings shall provide spatial enclosure for common open spaces to create privacy, limit views from streets and wind protection.		
Common open space	D	1.2	Common open space shall be visible and accessible to and from building amenity areas.		
Private open space	D	2.1	Private open spaces shall be directly accessible from the unit and large enough to permit outdoor activities with a minimum of five feet width and depth.		
Private open space	D	2.2	Private open space shall be constructed with high quality durable materials.		
Private open space	D	2.3	Fencing or screening between ground floor private open spaces shall permit visibility in and out of the open space for the top 18 inches.		
Hillside woodlands	E	1.1	A tree succession operations plan for aging mature trees prepared by a qualified arborist will guide the replacement of existing trees over time due to age or fire vulnerability.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Landscape design	E	1.2	Removed trees shall be replaced with a diverse plant ecology governed by the area's unique coastal/Mediterranean climate including evergreen and deciduous species as recommended by an arborist.		
Landscape design	E	1.3	The project's wooded hillside perimeter to the west and east shall be cleaned of surface and ladder fuels. Replacement trees shall include evergreen and deciduous species as described in the Project Tree List.		
Planting	E	2.1	Plant material shall be comprised of at least 75% drought tolerant plant species. Planting plans shall comply with Daly City's Water Conservation in Landscaping regulations and the Water Use Classification of Landscape Species (WUCOLS).		
Planting	E	2.2	Where turf grass is used, low water use hybrilds and/ or no mow varieties shall be used. A variety of shrubs and ground covers should be used to create layering around building foundations, keeping shrubs at or below windowsills. Plant selections should be such that sight linessightlines remain open and clearclear, and places of concealment are not fostered. Where allowed, pP_lants should be used to screen above-ground utilities. Along streets and sidewalks, plants species shall be used in planters within the right of way to create spatial be used that promote a feeling of separation between sidewalk and from vehicular traffic and be appropriate for narrow planters within the public right of way.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Planting	E	2.3	Pollinator plants that attract native birds and insects should be used strategically in locations well-suited to attract and sustain native populations. Use of fruiting plant material should occur away from hardscape areas to prevent staining of pavements and to minimize maintenance.		
Planters	E	3.1	Landscape planters within the street right of way shall be a minimum of four feet wide.		
Planters	E	3.2	Tree wells shall be 4'x 4' minimum. Tree grates shall be cast iron with a baked oil finish in plaza areas and be an ADA accessible design consistent with the neighborhood.		
Planters	E	3.3	Where landscape planting is provided under trees, planters shall be 4' W x 6' L minimum.		
Planters	E	3.4	Planted medians shall provide at least five feet wide planting area in addition to a minimum 12 inches wide maintenance band at the back of curb consisting of concrete, pavers, or fixed cobbles.		
Site irrigation	E	4.1	Site Irrigation systems shall comply with all local and state requirements as of time of project approval.		
Site irrigation	E	4.2	All irrigation equipment shall be controlled with weather-based controllers located in easily accessible, locked stainless steel pedestal boxes. The equipment should include flow sensors and automatic shut off valve capability with a wi-fi based alarm system to alert maintenance controller team(s).		
Site irrigation	E	4.3	Irrigation systems shall provide quick couplers or hose bibbs in lockable wall boxes in all common use areas.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Soils and drainage	E	5.1	On-grade planting areas shall be comprised of amended topsoil import or amended native soil as required, based on a soil analysis report and soil laboratory recommendations. Excavation, clearing and grubbing, or soil preparation shall occur within established tree protection zones as per the advice of a landscape architect or arborist.		
Soils and drainage	E	5.2	Planting areas shall by dressed with a 3-inch layer of mulch.		
Soils and drainage	E	5.3	Cast iron or similar drain grates shall be used in turf and pedestrian circulation areas. Landscape planters shall be drained with cast iron, decorative metal, plastic or similar flat or atrium-style grates and factory-fabricated bodies.		
Site furnishings	E	6.1	Site furnishings shall be comprised of materials designed to withstand outdoor conditions.		
Site furnishings	E	6.2	Short term bicycle parking shall be dispersed throughout the Plan Area, as required to meet project requirements, city standards, and bicycle parking standards. Bicycle racks shall be galvanized, vinyl covered, or stainless steel, and meet all City requirements. In ground- or surface-mounted attachment is acceptable.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Site furnishings	E	6.3	Seating shall be provided at retail, parks, open spaces, adjacent to the trails, and in front of primary building lobbies. Benches shall be made of metal and/or wood. Where wood is used, it should be thermally modified, or a suitable hardwood built to withstand weather and heavy public usage.		
Site furnishings	E	6.4	Café tables with chairs shall be movable with a variety of sizes for public use in gathering spaces and shall be constructed of materials suitable for outdoor public usage.		
Site furnishings	E	6.5	At least one drinking fountain shall be provided at each of the following: Overlook Park, Central Green, and the Recreation Trail. Dog bowl and water bottle filling attachments are recommended but not required.		
Site furnishings	E	6.6	Within Overlook Park, Applicant shall provide play equipment for children ages two through twelve. All play areas will be designated for children between agesthe ages of two to five and for ages five to twelve years old.		
Trees	E	7.1	Trees within the street right of way, in plazas, and high-visibility open space areas should be provided in 24-inch box size or larger and be secured with tree stakes or below-grade root ball guying systems appropriate for the windy conditions found in Daly City. Above-ground cabling guying shall not be used in public spaces. Trees shall be pruned up to 6 feet to 8 feet clear off the ground or as required by ADA or City guidelines.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Trees	E	7.2	Individual developments within the Plan Area shall use trees that are provided in minimum 15-gallon size or larger.		
Trees	E	7.3	Entries at the north and south shall have unique tree plantings.		
Trees	E	7.4	Seasonal interest shall be created with deciduous trees providing spring flowers and fall color.		
Trees	E	7.5	Driveway entries, curb cuts, and curb ramps shall be constructed of concrete and shall match sidewalks to provide a consistent look and feel for hardscape along vehicular and pedestrian circulation routes.		
Trees	E	7.6	Enhanced finishes and/or striping shall be used for crosswalks.		
Trails and paths	E	8.1	Trail surfaces shall be asphalt or concrete, provide for adequate clearances along the edges and overhead, and be suitable for their intended use. Refer to trail sections in Chapter 5 for trail dimensions.		
Trails and paths	E	8.2	Signage, ornamental landscaping, and trees shall be provided along the trail system to enhance user		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Stormwater management	E	9.1	Project submittals shall comply with the Precise Plan's phased, performance-based approach to stormwater management, consistent with the San Mateo County Municipal Regional Stormwater Permit, and Daly City's municipal code pertaining to stormwater management. Projects shall minimize the amount of paved area. Where feasible, paved areas shall include "green" stormwater collection and treatment, and employ Low Impact Development (LID) features that minimize surface water runoff. LID features may include bioretention systems, swales, green roofs, and permeable pavers.		
Stormwater management	E	9.2	Stormwater retention features that minimize runoff into streets, parking lots, landscaped areas, and open spaces shall be incorporated, where feasible. Stormwater retention features include drainage swales and rain gardens.		
Open Space Landscaping Standards	E	10.1	Landscaping shall define the edges of paths, plazas, and seating areas.		
Open Space Landscaping Standards	E	10.2	Trees shall be planted to shade walkways, gathering areas, parking, and other larger expanses of pavement.		
Open Space Landscaping Standards	E	10.3	Landscaping in setback areas shall create a transition zone between the sidewalk and street-level residential units and entries.		
Open Space Landscaping Standards	E	10.4	Landscaped areas shall be regularly maintained to keep them aesthetically pleasing, and to remove dead and dying plants.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Open Space Landscaping Standards	E	10.5	Gateway or entry points shall be emphasized with distinctive trees and plants.		
Open Space Landscaping Standards	E	10.6	Existing trees, to the extent feasible, and healthy, are to be preserved and integrated into site designs.		
Open Space Landscaping Standards	E	10.7	To reduce water usage, all development shall employ water-efficient irrigation techniques, including micro–irrigation, drip systems, and weather-based irrigation controllers, instead of conventional sprinklers.		
Open Space Landscaping Standards	E	10.8	Native, drought-tolerant, or well-adapted tree and plant species shall be used.		
Open Space Landscaping Standards	E	10.9	Seasonal and year-round flowering shrubs and trees shall be located where they can be most appreciated by site users and passersby, such as adjacent to walks and open space areas, or as frames for building entrances and stairs.		
Signage	F	1.1	Signs within the Plan Area shall comply with all regulations stated in the City's Zoning Ordinance (Chapter 17.32) unless otherwise specified in the Precise Plan.		
Signage	F	1.2	Signs shall be made of high-quality, durable, and environmentally friendly materials.		
Signage	F	1.3	Multi-tenant development anchor-identity signs should be complementary to any Plan Area signage or established by the Master Developer. Individual property owners will be allowed to use letter styles, but the overall sign should have one consistent material for letters and background.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Monument & gateway signage	F	2.1	The Precise Plan shall include up to two freestanding monument/gateway signs: at the Serramonte Boulevard and Entry Drive intersection and at the West Drive and Campus Drive intersection, which form major entry points to the Plan Area.		
Monument & gateway signage	F	2.2	If provided, a single gateway or monument sign at the southern portion of the Plan Area near the round-about shall be located at Parcel E and be less than 4 feet high. The sign shall not obstruct sightlines for drivers to the extent safety is compromised.		
Monument & gateway signage	F	2.3	If provided, a single gateway or monument sign at the northern portion of the Plan Area near the Retail Plaza shall be located at Parcel B. It may either be less than four feet high and no longer than 20 feet, or may be a tower structure--either integrated with the Parcel B building corner or separate from the building. If an integrated tower structure, the structure shall not project more than five feet beyond the face of the building in any direction. If an independent tower structure, it may not be greater than 32 feet in height and not more than 64 sq feet in area. The maximum face area of signage of the Tower Structure shall not exceed 200 SF.		
Monument & gateway signage	F	2.4	Gateway or monument signs shall not have internal illumination but will be lighted with externally mounted luminaires.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Building signage	F	3.1	The physical design of signage shall conform to the architectural detailing of the associated building.		
Building signage	F	3.2	Signage shall not obstruct architectural details such as recesses, structural bays, or windows.		
Building signage	F	3.3	Externally illuminated or halo lit signs are encouraged. The use of internally lighted or box type signs are prohibited. Internally lighted signs measuring 2 sq. ft. or less are allowed.		
Building signage	F	3.4	No more than three (3) building residential signs shall be provided per building. These shall be limited to address number, street name, and/or a building name if desired. If only one is provided, it shall be placed close to the main entry to the building. If signage is provided at more than one location, a minimum of one shall be placed close to the main entry. The second and third can be located such that the top of the signage is not greater than 25' feet from grade. The aggregate sign area shall not exceed 150 sq. ft.		
Building signage	F	3.5	Durable, vandal-resistant materials and finishes shall be utilized for address signs.		
Building signage	F	3.6	Conduit, tubing, or raceways shall be concealed. Transformers and other equipment for the signage shall also be concealed.		
Storefront signage	F	4.1	Signage for multi-tenant retail buildings shall be developed to minimize potential visual conflict, clutter, and competition.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Storefront signage	F	4.2	Maximum size for sign area per retail tenant is 30 sq. ft. on the face of a building. A second sign per retail tenant, not exceeding 20 sq. ft., may be hung as either a banner or a rigid sign perpendicular to the building face. Either of these two sign types may be attached to a building's architectural canopy.		
Storefront signage	F	4.3	For ground floor retail uses, hanging or projecting signs should be located near the front entry of a store. Coordinate with the overall design of the street wall. Hanging or projecting signs shall meet Americans with Disabilities Act (ADA) clearance requirements.		
Storefront signage	F	4.4	Ancillary retail space or leasing offices shall be signed in a manner consistent with the storefront signage standards in this section.		
Prohibited signs	F		Prohibited signs include:		
Prohibited signs	F	5.1	Signs which rotate, move mechanically or by the wind, flash, blink or reflect light by means of a polished or mirrored surface.		
Prohibited signs	F	5.2	Open flames, balloons, loudspeakers used to call attention to a product, service, or a property.		
Prohibited signs	F	5.3	Signs which identify or advertise a product or service not available on the premises.		
Prohibited signs	F	5.4	Externally illuminated signs where the source of light is directly visibleor cause glare or reflections that are a traffic hazard or nuisance.		
Prohibited signs	F	5.5	Signs which emit or reflect light by means of direct fluorescence, phosphorescence, or "day-glow" colors.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Prohibited signs	F	5.6	Any sign illumination which exhibits undue glare.		
Prohibited signs	F	5.7	Any sign placed or displayed on vehicles parked primarily for the purpose of displaying the sign. (This does not apply to food trucks that are parked while they provide service.)		
Prohibited signs	F	5.8	Internally lit signs where the entire face of the sign is illuminated, rather than just the graphics.		
Prohibited signs	F	5.9	Advertising bench signs, unless required by SamTrans at Serramonte Blvd.		
Prohibited signs	F	.5.10	Off-site directional signs.		
Prohibited signs	F	5.11	Roof signs.		
Prohibited signs	F	5.12	Outdoor advertising billboard signs.		
Prohibited signs	F	5.13	Abandoned signs.		
General lighting standards	G	1.1	Lighting shall incorporate dark sky principles by shielding fixtures to prevent light from emitting above a 90-degree angle. Any lighting source located on parking or rooftop parking shall be a full cutoff type.		
General lighting standards	G	1.2	Light shall be designed to minimize glare and light trespass into neighboring buildings and properties.		
General lighting standards	G	1.3	High-efficiency technology such as LED lighting with advanced controls shall be utilized to minimize energy consumption.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
General lighting standards	G	1.4	The use of energy–efficient, long-life LEDs with light color rendered as a warm white (maximum K 3000) is encouraged.		
Street lighting	G	2.1	Provide streetlights in general locations shown on Figure 3.7, Lighting Diagram.		
Street lighting	G	2.2	Streetlights shall comply with Daly City standards.		
Pedestrian lighting	G	3.1	Provide pedestrian lighting in general locations shown on Figure 3.8, Lighting Diagram. Additional locations for pedestrian lighting are along pedestrian pathways in open spaces and in surface parking areas.		
Pedestrian lighting	G	3.2	Pedestrian lighting shall not be taller than 25 feet in height.		
Pedestrian lighting	G	3.3	Pedestrian lighting may be integrated with streetlighting by providing additional luminaires facing the sidewalk on streetlight poles, installed at a lower height than street luminaries.		
Pedestrian lighting	G	3.4	Lighting in surface parking lots and service areas shall be directed away from surrounding buildings and properties using fixtures that minimize light trespass and glare.		
Low illumination pedestrian lighting	G	4.1	Commercial grade bollards, step lights, and path lights shall be used as appropriate along pedestrian walkways and plazas.		
Low illumination pedestrian lighting	G	4.2	Nighttime lighting for recreational uses in parks and public spaces should be unobtrusive and control glare.		

Topic	Section	Number	Standard	Applicant To Fill Project Compliance (Yes/No/Not Applicable)	City Staff Comments
Building lights	G	5.1	Lighting should be integrated into the design of buildings and building architecture to highlight significant architectural features such as signs, entrances, walkways, or storefront displays.		
Building lights	G	5.2	Building facades may be illuminated using shielded fixtures to highlight architectural features.		

Appendix B:
Compliance Review - Example Projects

URBAN DESIGN STANDARDS

Street Frontage – Mixed-Use Ground Floor Use

Compliant

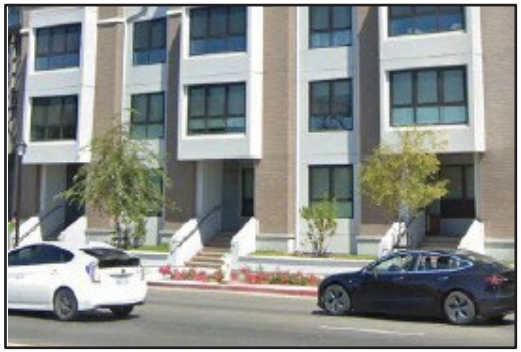
Building meets street frontage standards for mixed-use ground floor uses:
A.2.2 Primary elevation aligns with build-to-line
A.2.3 Building entry canopies with a height greater than 16 feet can encroach into the ROW
B.2.2 Ground floor height meets 16-foot minimum
B.3.8 Physical and visual pedestrian access required

Non-Compliant

Building does not meet street frontage standards for mixed-use ground floor uses:
A.3.1 Exceeds permitted maximum of two 12-foot driveways - loading areas prohibited for active street frontages
B.2.2 Does not meet minimum floor-to-floor ground floor height of 16 feet
B.3.8 No physical or visual pedestrian access from sidewalk

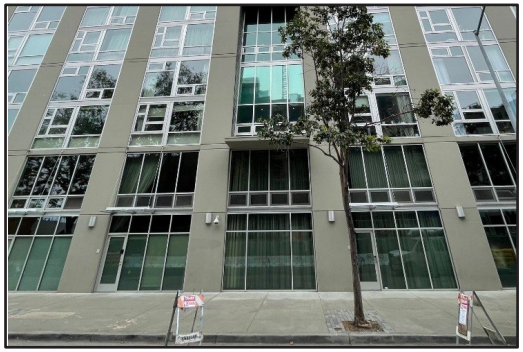
Street Frontage - Active Residential Ground Floor Use

Compliant



Building meets street frontage standards for active residential ground floor use:
A.2.2 Primary elevation aligns with build-to-line
B.3.8 Residences have physical and visual pedestrian access from sidewalk

Non-Compliant



Building does not meet street frontage standards for active residential ground floor use:
B.3.8 Lack of ground floor uses with physical and visual pedestrian access from sidewalk

ARCHITECTURAL DESIGN STANDARDS

Building Massing - Pedestrian and Podium Level

Compliant

Building meets building massing standards for pedestrian and podium levels:
B.2.3 First three levels differentiated with upper floors by setback; lower floors visually support massing of floors above; high quality materials and horizontal belt course at second level floor
B.2.4 Upper levels of building stepback from lower building wall

Non-Compliant

Building does not meet building massing standards for pedestrian and podium levels:
B.2.3 Lack of differentiation between upper and ground floors
B.2.4 No upper level building stepbacks

Building Massing - Tower Level

Compliant

Building meets building massing standards for towers:
B.2.5 Tower massing extends to ground level
B.2.6 Tower massing extending to the ground is setback minimum 10 feet

Non-Compliant

Building does not meet building massing standards for towers:
B.2.6 Tower extending to the ground is not setback minimum 10 feet

ARCHITECTURAL DESIGN STANDARDS

Architectural Character; Massing; Facade Composition; Windows & Doors; Materials & Colors

Compliant

Building complies with the following standards:

Architectural Character

B.1.1 Contemporary architectural design

B.1.2 No reference to historic styles or materials

B.1.3 Avoids prohibited roof forms and materials

B.1.4 Avoids ribbon windows and flat building facades

B.1.5 Avoids auto-oriented ground floor

B.1.6 Building elements are in proportion to one another

B.1.7 Avoids visual discord of too many sizes and shapes

B.1.8 Avoids randomly sized building elements

Building Massing

B.2.2 Ground floor storefronts floor-to-floor height 16 feet

B.2.3 Ground floor differentiated from upper floors

B.2.4 Upper levels of building stepback from building wall

Facade Composition

B.3.1 No continuous long flat facade

B.3.2 Occupied projections

B.3.3 Facade divided using projecting and recessed volumes

B.3.4 Fenestration uses projecting bays and recesses

B.3.5 Avoids featureless fenestration

B.3.6 Avoids blank facades

B.3.8 Transparent storefront windows

B.3.9 Sliding ground floor doors for outdoor dining

Windows and Doors

B.4.1 Identifiable building entrances

B.4.2 Residential entries differentiated from retail entries

B.4.4 Upper story windows with detail

B.4.5 No use of reflective glazing

Materials and Colors

B.5.1 Materials and colors coordinated for visual harmony

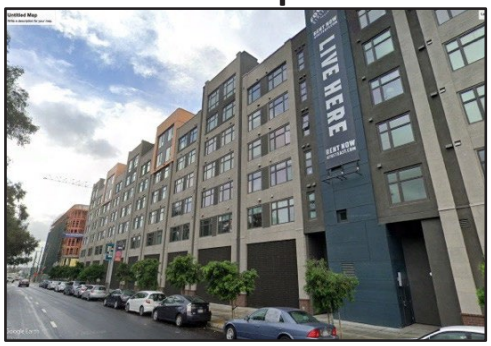
B.5.2 High quality materials used at ground floor

B.5.3 Color differentiates architectural elements

B.5.4 No monolithic color

B.5.5 No garish or discordant colors

Non-Compliant



Building does not comply with the following standards:

Building Massing

B.2.3 Ground floor not differentiated from upper floors

Facade Composition

B.3.1 Continuous long flat façade – no building projections or recesses for facade over 100 feet in length

B.3.2 No occupied projections

B.3.3 Facade not divided using projecting or recessed volumes

B.3.4 Fenestration is flat, with no visual relief, no contrasting surfaces or use of projecting or recessed planes to create a rhythm of light and shadow

B.3.8 No active ground floor uses

Windows and Doors

B.4.1 Entrances not identifiable or easy to find from sidewalk

B.4.4 Upper story windows have no architectural details that recess or project from facade

Materials and Colors

B.5.2 Color does not differentiate architectural elements

B.5.3 Building is a monolithic color

ARCHITECTURAL DESIGN STANDARDS

Architectural Character; Massing; Facade Composition; Windows & Doors; Materials & Colors

Compliant

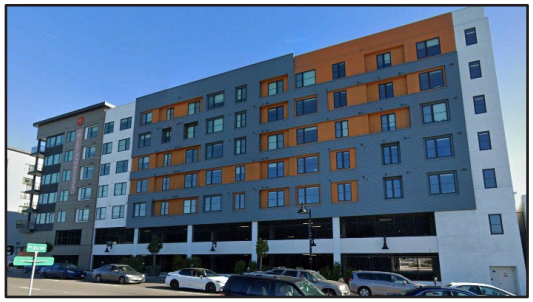
Building complies with architectural character, massing, facade composition, windows & doors, materials & color standards.

Building complies with architectural character, active ground floor use, building massing, facade composition, window detail, and color standards.

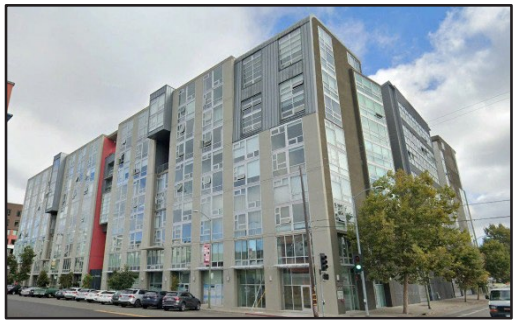
Building complies with architectural character, massing, facade composition, windows & doors, materials & color standards.

Non-Compliant

Building does not comply with architectural character (use of historic architectural style) and color standards (monolithic color).



Building does not comply with architectural character (auto-oriented ground floor), no ground floor use, flat building massing, no facade modulation, no identifiable pedestrian entrance.



Building does not comply with architectural character (vertical ribbon windows), no active ground floor use, flat building massing, no facade modulation, no clear building entrance, no window detail, monolithic building color.

ARCHITECTURAL DESIGN STANDARDS
Parking Structures

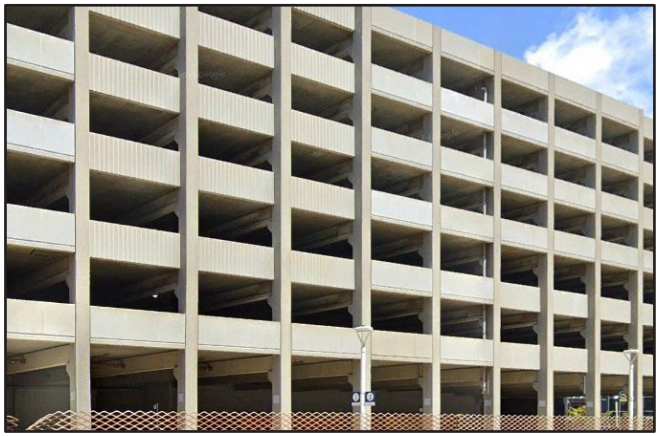
Compliant

Parking structure complies with the following standards:

C.5.1 Above grade parking structure applies screening to minimize visual impact

C.5.4 Above grade parking structure designed with human-scale elements that complement and does not contrast with buildings and public spaces

Non-Compliant



Parking structure does not comply with the following standards:

C.5.1 Above grade parking structure does not apply screening to minimize visual impact

C.5.4 Above grade parking structure does not visually recede, rather it visually contrasts with surrounding buildings and public spaces

Acknowledgements

Jefferson Union High School District

Board of Trustees

- Andrew Lie, President
- Kalimah Salahuddin, Vice President
- Jerome Gallegos, Trustee
- Sherrett Walker, Trustee
- Rosie Tejada, Clerk

District Staff

- Toni Presta, Superintendent of Schools
- Tina Van Raaphorst, Associate Superintendent of Business Services
- Austin Worden, Director of Communications & Staff Housing
- Monica Casey, President American Federation of Teachers (AFT) Local 1481

Brookwood Advisors

- Alan Katz, President
- Bruce Fukuji, Planning Director
- Chris White, Project Director

PlaceWorks

- Bruce Brubaker, Principal-in-Charge
- Janet Chang, Project Manager
- Pranjali Deokule, Project Manager

Seidel Architects

- Alex Seidel, FAIA, Founding Principal
- Paul Dent, Senior Associate
- Michael Rizza, Associate

Fehr & Peers Transportation Planning

- Bill Burton, Senior Associate

Jett Landscape Architecture + Design

- Bruce Jett, Principal
- Jesse Markman, Principal
- Samantha Elms, Landscape Designer
- Rebecca Vanni, Associate

BKF Engineers

- Brian Scott, Principal
- Tim Heffernan, Senior Project Manager

Office of the San Mateo County Counsel

- John D. Nibbelin, Chief Deputy County Counsel
- Timothy J. Fox, Lead Deputy County Attorney

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Jefferson Union High School District - City of Daly City

Serramonte Del Rey Development Agreement Summary

October 12, 2023

Affordable Housing

- Deeper Level of Affordability than City's Inclusionary Housing Ordinance: Parcel C will provide 150 affordable housing units ranging from 23% AMI to 60% AMI:
    - 24 units will be set aside for residents with Intellectual and Developmental Disabilities (IDD)
    - 12 units will be at 23% AMI, with the intention that these families can qualify to utilize the on-site Head Start facility.
- 20% Affordable Housing representing double the affordable housing required by City's Inclusionary Housing Ordinance:
    - Parcel C will include 150 affordable units plus 2 manager's units (13.5% of the proposed units in Parcels B through F) at Very Low and Low Income levels
    - Parcels D through F will include up to 73 units at Moderate Income levels
- The affordable housing developer will offer wrap-around support services for Parcel C residents
- Timing Considerations
    - One market rate building may be built prior to the affordable housing and without Moderate Income units. After the first market rate building, each subsequent market rate building will be built with 10% of the units at Moderate Income. The final market rate building will be built with the number of Moderate Income units necessary to bring the overall percentage of affordable units to 20% overall.
    - The affordable housing parcel may be built with two affordable housing buildings. One affordable housing building with at least 60 units will be built before a second market rate rental housing building can built.
    - After the first market rate building is built, the overall percentage of Very Low and Low Income affordable housing will not drop below 13.5% of the overall unit count (Parcels B through F).
- Timing Contingencies
    - In the unlikely event that the affordable housing project takes longer than anticipated to be built after the first market rate building is completed, contingencies will ensure affordable housing representing 13.5% of the units are provided.

Off-site Improvements

- Serramonte Blvd / Hwy 1 Intersection Improvements
    - The District will implement the following improvements at the intersection of Serramonte Blvd and Highway 1 at the time of the first market rate building:
        - Signalize the intersection
        - Walk/Bike Daly City bike lanes
        - Bus stop improvements
        - Paving reconstruction at the intersection
    - The District will design and implement the improvements. The costs will be allocated as follows:
        - District will pay the full intersection costs up to $1.7M adjusted for escalation. Beyond this amount, the District and City will share costs 50/50 up to an additional $400,000 ($200,000 each) adjusted for escalation.
        - Fee Deferral: The City will defer payment of certain city fees (AB 1600 fees and General Plan Maintenance Fee) until a later phase of the project build-out to help spread the cost of the intersection improvements over the phases of the project.
- Sidewalk on Callan Blvd
    - District will repair the existing sidewalk to prolong its life and eliminate tripping hazards as needed.
    - District will widen the existing sidewalk at three locations along the 740’ frontage. This will create three passing zones approximately 8’ long with a width of 5’.
    - District will provide a treated lumber retaining wall along the hillside adjacent to the sidewalk on an as-needed basis to reduce sloughing of soil onto the sidewalk (see engineering drawing below for details). The length of retaining wall that will be needed is estimated at approximately 50% of the 740’ sidewalk.
    - District will implement the work and pay for the costs for the design, permitting and construction of the sidewalk improvements. The improvements described above will be completed as each building on parcel fronting Callan (parcels B, C and D) is built.
- Bicycle Lanes on Campus Drive south of site (Condition of Approval)
    - District to restripe Campus Drive between the proposed roundabout and Hickey Blvd within the existing curb-to-curb width of the roadway to create buffered bike lanes in both the north and south direction.
    - The restriping will be complete no later than at the time that Campus Drive will be opened to new vehicle traffic from the project, i.e. when the proposed roundabout is completed and connected with a new building within the project.
- Hickey Blvd / Callan Blvd Intersection Improvements (Condition of Approval)
    - The District will create a 200’ right turn lane from westbound Hickey Blvd onto northbound Callan Blvd, eliminating on street parking.
    - The District will optimize signal timing of the intersection.
    - Applicant will pay the cost in full and take responsibility for implementation.

    - The restriping and timing of the signalization will be complete no later than at final Certificate of Occupancy for the first housing project to be built.
- The District will improve the following additional intersections:
    - Optimize traffic signal at Callan Blvd / Serramonte Blvd
    - Lengthen turn lanes by modifying striping at the following intersections: Hwy 1 ramps / Serramonte Blvd, Skyline Blvd / Hickey Blvd, Callan Blvd / Hickey Blvd.
    - The improvements will be paid for and implemented by the District by the time of the Certificate of Occupancy of the final building in the project, or of the 500th unit, whichever is sooner.

Project Program Design

- Head Start
    - District will make space available for lease within the project, currently planned to be co-located with the affordable housing building
    - The District and the Affordable Housing Developer are working with the Head Start program to provide a comparable scale as the existing facility and work with Head Start to support their fundraising efforts
- Masterplan includes DPW requested protected bike lanes through the project (reflected in project plan)
    - Entry Drive incorporates buffered bike lanes with vertical delineators, and North County Fire Department accepts vertical delineators within the 26-foot emergency vehicle clear right-of-way.
    - North Drive and East Drive change Class II buffered bike lanes to Class IV protected bike lanes.
    - There are sharrows rather than protected bike lanes on West Campus Drive.

Cash Contributions to City

- Cash payment of $300,000 to City to implement off-site park, bicycle, and/or pedestrian improvements at City's discretion. Payment made pro rata for each parcel at Certificate of Occupancy.
- Cash payment of $160,000 to City towards Clarinada / Hwy 1 intersection signalization. Payment made pro rata at the time each parcel achieves its Certificate of Occupancy. (Condition of Approval)

Other Terms

- Development rights will be vested for 30 years
- Some city development fees limited to inflation adjustments

DEVELOPMENT AGREEMENT BETWEEN THE CITY OF DALY CITY AND JEFFERSON UNION HIGH SCHOOL DISTRICT
[DRAFT 11/9/2023]

THIS DEVELOPMENT AGREEMENT (the "Agreement") is entered into this [ ]th day of [month], 2023, between THE JEFFERSON UNION HIGH SCHOOL DISTRICT (the "District"), and the CITY OF DALY CITY, ("City") pursuant to the authority of Sections 65864 et seq. of the California Government Code.

RECITALS AND FINDING

This Agreement is based on the following facts, understandings and intentions of the parties:

A. To strengthen the public planning process, encourage private participation in comprehensive planning and reduce the economic risk of development, the California Legislature enacted the Development Agreement Statute (Government Code, Section 65864 et seq.), which authorizes any city to enter into binding, long-term agreements with persons or entities having legal or equitable interests in real property, for which agreements provide for the development of the property.

B. City, by Ordinance No. 635, adopted development procedures for the Planned Development District, now contained under Daly City Municipal Code Chapter 17.28. Daly City Municipal Code Chapter 17.28.030 prescribes the requirements for a Precise Plan necessary to govern development in a Planned Development District.

C. In 1985, the City adopted Precise Plan PD-31. Precise Plan PD-31 extends from Hickey Boulevard at the south to Serramonte Boulevard at the north. The 1985 Precise Plan envisioned two phases of development with the closure of Serramonte High School. Housing, office and Summit Shasta Charter High School was developed on the southern portion of the PD-31 site south of the existing high school building.

D. A portion of the remaining 22 acres of the PD-31 site has been entitled as PD 31A for Faculty and Staff housing and has been constructed. The rest of the 22-acre second phase area on the North of the PD-31 site has not been realized and is the subject of the Precise Plan, as such term is defined below, considered and approved by the City Council on [xxxxxxxxxx]. The Precise Plan area is the location of existing District school facilities currently used for District office space.

E. The Precise Plan will enable the District to build out the Project to transform their existing outdated high school facilities into a new walkable, bikeable and family-friendly residential neighborhood with a mix of low-income and market-rate housing for members of the community. The Project also includes retail uses, parks and open space, a Head Start Preschool Program, and recreational trail improvements. The Project envisions phased development of up to 1,235 units of affordable and market rate rental housing on District lands to be built-out over the Term of this Agreement, as defined below (inclusive of the Faculty and Staff housing described in Recital D that is already constructed). The Project will attract investment, increase funding for student education, and allow the District to attract and retain highly qualified teachers. The Precise Plan is a land use entitlement pursuant to the Daly City Municipal Code and operates independently of this Development Agreement.

F. The District seeks to subdivide the Project Site into Parcels A through F in accordance with the Tentative Map, as such terms are defined below.

G. In addition to this Agreement, the Precise Plan, and the Tentative Map, the Project Approvals include a Tentative Affordable Housing Plan that will be memorialized in an Affordable Housing Plan and an Inclusionary Housing Agreement pursuant to Daly City Municipal Code Section 17.47.140

H. The District is a public school district in San Mateo County. Currently, the District is the lowest funded high school district in the County, and every year the District loses staff, the majority of which leave for other districts. By developing the Project, the District aims to generate revenue to support underfunded educational programs, attract and retain faculty and staff, and improve the quality of life for students, neighbors, and the City.

I. The Project is consistent with the goals and policies of the 2030 Daly City General Plan, as amended by the 2015 Housing Element.

J. The Project at build-out will provide more affordable housing units than required by the City's Inclusionary Housing Ordinance. The City and the District have developed a Tentative Affordable Housing Plan to govern the provision of affordable housing throughout the Project. Prior to issuance of building permits for the Project, the Tentative Affordable Housing Plan will be memorialized in an Inclusionary Housing Agreement pursuant to Daly City Municipal Code Section 17.47.140 and subject to the terms of this Agreement.

K. The City finds the Project, including this Agreement and the Tentative Map, comply with Government Code section 66473.7.

L. [PLACEHOLDER FOR CITY PLANNING COMMISSION ACTION ON DA AND EIR]

M. [PLACEHOLDER FOR CITY ACTION ON DA ORDINANCE].

N. [PLACEHOLDER FOR CITY FINDING OF CONSISTENCY, IF SO FOUND: The City Council hereby finds that this Development Agreement furthers the public health, safety and general welfare and is consistent with the City's General Plan as amended. The City Council further finds that the City has taken all necessary proceedings in accordance with the City's ordinances, rules and regulations for the approval of this Agreement.]

DRAFT

AGREEMENT

ARTICLE 1: DEFINITIONS

Section 1.1. "City" is the City of Daly City, a municipal corporation organized and existing under the laws of the State of California.

Section 1.2. "City Council" is the City Council of the City.

Section 1.3. "City Manager" is the City Manager of the City or the City staff person (s)he designates to carry out all or part of the City's responsibilities for implementing this Agreement.

Section 1.4. "City Planning Manager" is the senior City official authorized to administer the City's planning and development procedures and projects, including its development agreements.

Section 1.5. "Conflict" with any Project Approvals shall mean (1) an express inconsistency with the Project Approvals or (2) a material limitation on or interference with the ability of the District, whether it be technical, economic, or otherwise, to construct and operate the Project according to the Project Approvals.

Section 1.6. "Days" shall refer to calendar days.

Section 1.7. "Development Impact Fees" shall mean monetary exactions which are charged by City in connection with any approval, permit or entitlement relating to development, for the purpose of financing all or a portion of the cost of public facilities, programs or services related to the Project, including but not limited to any Fair Share Fees, other Assembly Bill 1600 fees (pursuant to the Mitigation Fee Act [California Government Code section 66000 et seq]), general facilities fees, parks facilities fees, fire fees, sewage fees, water fees, or police fees.

Section 1.8. "District" refers collectively to the Jefferson Union High School District, a public school district.

Section 1.9. "Effective Date" is the date this Agreement is executed by the City Manager pursuant to Section 6.18 hereof.

Section 1.10. "Enacting Ordinance" means City Ordinance No. [New Ord #], enacted by the City Council on [date], 202[3], approving this Agreement. This Agreement shall constitute a part of the Enacting Ordinance as if incorporated therein in full, and a copy of this ordinance is attached hereto as Exhibit [K].

Section 1.11. "Existing Ordinances" means Ordinances in effect as of the Effective Date of this Agreement, including the Enacting Ordinance of this Agreement and the Precise Plan adopted concurrently with this Agreement. City has separately compiled the Existing Ordinances and intends to maintain them in an appropriate file indexed to this Agreement. District has reviewed said compilation, as of the time of this Agreement, and agrees thereto; for convenience, many of the Existing Ordinances are attached hereto in Exhibit [I]. District shall have the right to waive its vested rights as to any particular vested law, regulation, development standard, or other requirement, at its sole discretion, consistent with the terms of Section 3.2 of this Agreement.

Section 1.12. "Fair Share Fees" shall be those fees for development enacted pursuant to Daly City Municipal Code Chapter 3.36, including any fees for city administrative facilities, fire facilities

and equipment, libraries, police facilities and equipment, community recreation centers, street improvements, and water and sewage facilities.

Section 1.13. "Force Majeure Event" refers to delay or other circumstances that materially and negatively impact the District's ability to develop this Project as contemplated in the Project Approvals, including this Agreement and its Exhibits, including, but not limited to: acts of God, including without limitation floods, earthquakes, fires, pandemics, casualties; acts of war or civil unrest, a public enemy, terrorism, insurrections, riots, mob violence, sabotage, and malicious mischief; strikes, walk-outs, labor disputes, and other labor stoppages; unfavorable market conditions, including without limitation a recession or depression, that render development economically and otherwise infeasible; delay attributable to the actions or inaction of any governmental agency, including without limitation delays in the issuance of permits, approvals, or other actions required for development of the Project, including without limitation Project Approvals and Subsequent City Approvals, or the enactment of conflicting state or federal laws or regulations; delays of the City in processing any Subsequent City Approval beyond periods of time permitted by law or required by this Agreement or the Precise Plan; boycotts or other shortages or limits on the availability of necessary equipment, materials, or supplies; failure of transportation (but not attributable to a mere increase in price unless such price is commercially unreasonable and will extend for a period of time under the circumstances); a development moratorium (including but not limited to a sewer or water moratorium) approved by the City or other entity having jurisdiction; environmental conditions on the Project Site or other properties in the vicinity; any litigation, administrative action, or judicial or administrative decision, ruling, or order preventing or delaying the development of the Project or adversely affecting the ability of the City, the District, or the District's successors or assigns to obtain financing for the Project; the commencement of circulation of an initiative or referendum petition or the filing of any court action to set aside or modify this Agreement, the Project Approvals, or any Subsequent City Approvals; delay attributable to insufficient water available to serve the Project or any phase or portion thereof; or any, delay claimed by a party in the performance of any term, covenant, condition or obligation under this Agreement caused by a default of the other party. For the purpose of this definition, a cause shall be beyond the control of the party whose performance would otherwise be obligated only if such cause would prevent or hinder the performance of an obligation by any reasonable person similarly situated and shall not apply to causes peculiar to the party claiming the benefit of a Force Majeure Event (such as the failure to order materials in a timely fashion).

Section 1.14. "Future Ordinances" means Ordinances enacted after the Effective Date of this Agreement (including amendments which may be made to Existing Ordinances). Any ordinance amendment to the Project Approvals that is sought by the District and approved by the City shall not be considered a "Future Ordinance."

Section 1.15. "Ordinances" means the ordinances, resolutions, codes, rules, regulations and official policies of City governing the permitted uses of land, density, design, improvement, and construction standards and specifications applicable to the use and development of the Project Site. Said Ordinances include without limitation the Precise Plan, City's General Plan, Zoning Ordinance, and construction codes.

Section 1.16. "Planning Commission" is the Planning Commission of the City.

Section 1.17. "Precise Plan" means the Serramonte Del Rey Precise Plan update, adopted on [DATE], focusing on the Phase II area of the 1985 Serramonte Del Rey Precise Plan (PD 31), complementing the City's 2019 approval of a Precise Plan update to permit the construction of faculty and staff housing on a portion of the Project Site (PD 31A), which constitutes the first

phase of the Project's development. The Precise Plan is a land use entitlement pursuant to the Daly City Municipal Code and operates independently of this Development Agreement.

Section 1.18. "Project" means the planned further development of the Project Site or a portion thereof, to further its function as a mixed-use project consisting of 1,235 residential units and the public infrastructure associated with the Project Site, in accordance with this Agreement, the Exhibits thereto, the Tentative Map, and the Precise Plan.

Section 1.19. "Project Approvals" shall mean this Agreement and its Exhibits; the Precise Plan; a General Plan amendment; the Tentative Map; Tentative Affordable Housing Plan; any other land use entitlements or agreements related to the Project that are considered and approved by the City concurrent with this Agreement; and any and all amendments to the foregoing that are sought by the District and approved by the City.

Section 1.20. "Project Site" means that certain real property graphically depicted on Exhibit [A] and legally described in Exhibits [B]. For ease of identification in this Agreement, and pursuant to the Precise Plan, the Project Site contains separate parcels of property subject to the Tentative Map to be potentially developed, defined as follows for the purposes of this Agreement:

(a) "Parcel A" means that certain real property within the Project Site graphically depicted and labeled as Parcel A in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(b) "Parcel B" means that certain real property within the Project Site graphically depicted and labeled as Parcel B in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(c) "Parcel C" means that certain real property within the Project Site graphically depicted and labeled as Parcel C in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(d) "Parcel D" means that certain real property within the Project Site graphically depicted and labeled as Parcel D in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(e) "Parcel E" means that certain real property graphically depicted and labeled as Parcel E in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(f) "Parcel F" means that certain real property graphically depicted and labeled as Parcel F in [Figure 2.2] of the Precise Plan and on the Tentative Map.

(g) "Infrastructure Parcels" means those Parcels numbered one (1) through six (6) on the Tentative Map, and which accommodate urbanized development and infrastructure that includes, without limitation, streets, parkland, and utilities.

The foregoing parcels shall continue to be referred to as Parcels A through F and Parcels 1 through 6 even if the legal lot lines are modified through any Subsequent City Approvals, so long as such parcels are in substantial compliance with the parcels shown on the Tentative Map.

Section 1.21. "Subsequent" means occurring after the Effective Date.

Section 1.22. "Subsequent City Approvals" means any subsequent land use or development permits, approvals, or entitlements applied for by District or its successors in interest, assigns, agents, development partners, lessees, licensees, or sublessee with respect to development of the Project Site, including but not limited to:

(a) Development Applications and Conformance Review, including Design Review

(b) Amendments to the Tentative Map or other Project Approvals

(c) Final Subdivision Maps

(d) Site Improvement Plans

(e) Environmental Review pursuant to the California Environmental Quality Act

(f) Building permits, demolition permits/approvals, and/or certificates of occupancy

Section 1.23. "Tentative Map" shall mean the tentative subdivision map dividing the Project Site into separate legal lots as depicted in Exhibit [G].

DRAFT

ARTICLE 2: LIST OF EXHIBITS

[PROPOSED EXHIBIT LIST]

EXHIBIT A. SITE MAP

EXHIBIT B. LEGAL DESCRIPTION OF PROJECT SITE

EXHIBIT C. PUBLIC CIRCULATION IMPROVEMENTS

EXHIBIT D. HEAD START PRESCHOOL OPERATIONS

EXHIBIT E. TENTATIVE AFFORDABLE HOUSING PLAN

EXHIBIT F. PRECISE PLAN

EXHIBIT G: TENTATIVE MAP

EXHIBIT H. MITIGATION MONITORING AND REPORTING PROGRAM

EXHIBIT I. FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

EXHIBIT J: COPY OF EXISTING ORDINANCES

EXHIBIT K: ENACTING ORDINANCE

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ARTICLE 3: DEVELOPMENT OF PROJECT SITE

Section 3.1. General. District shall have the vested right to develop the Project on the Project Site in accordance with the Project Approvals, and any subsequent amendments to the Project Approvals that are sought by the District and approved by the City, and City shall have the right to regulate development and use of the Project Site in accordance with the provisions of this Agreement.

Section 3.2. Applicable Ordinances. Subject to the terms of this Agreement and the Project Approvals and any amendments thereto, the Existing Ordinances shall control the permitted uses of the Project Site, the density and intensity of such uses, the maximum height and size of proposed buildings, the requirements for reservation and dedication of land for public purposes, and development standards. Except as otherwise provided in this Agreement, to the extent that any Existing or Future Ordinances, whether adopted by the City Council or by initiative, purport to be applicable to the Project Site but are in conflict with this Agreement or the other Project Approvals, the Project Approvals shall prevail, unless the parties mutually agree to amend or modify this Agreement pursuant to Article 5 hereof. To the extent that any Future Ordinances are not in conflict with this Agreement and the other Project Approvals, such Future Ordinances shall be applicable to the Project Site. The ordinances that govern pursuant to this Section 3.2 shall be known as the "Applicable Ordinances." Notwithstanding the above, District shall have the right, at its sole election, to waive any of the foregoing vested rights, in whole or in part, in conducting construction or operations on the Project Site or in pursuing any particular Subsequent City Approval or other entitlement or permit.

Section 3.3. City Conditions. This Agreement shall not prevent the City from denying or reasonably conditioning approval of any application for a Subsequent City Approval on the basis of Applicable Ordinances and Project Approvals, and which do not conflict with the same.

Section 3.4. Processing of Subsequent City Approvals. The parties recognize that in order to implement the further development of the Project Site as contemplated in this Agreement, District must obtain subsequent approvals, including without limitation the Subsequent City Approvals. Provided that District exercises reasonable diligence, acts in good faith, pays all required processing fees and files full and complete applications in conformity with this Agreement, the other Project Approvals, and Applicable Ordinances, as set forth in Section 3.2, City shall expeditiously review and process all applications for Subsequent City Approvals required to develop the Project consistent with the terms of this Agreement, the other Project Approvals, and Applicable Ordinances. City shall use its best efforts to process and act upon all such applications within the time periods set forth in the Project Approvals, or in the Applicable Ordinances for those approvals not addressed in the Project Approvals.

Section 3.5. Fees and Exactions. Except as otherwise provided in this Agreement, the development of the Project under the Project Approvals, and the Subsequent City Approvals shall be subject only to those fees, with the exception of AB 1600 Developer Impact Fees, and other fees and exactions, and fee amounts which are in effect at the time of the Effective Date, subject to adjustment of fee amounts only for inflation and deflation, which adjustment shall be based upon the U.S. Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for the Bay Area (San Francisco-Oakland-Hayward), not seasonally adjusted, using the Effective Date as a baseline for the purpose of inflation or deflation calculations.

1.1 If any Project Approval or Subsequent City Approval is subject to a legal challenge prior to the expiration of the statute of limitations to challenge either approval, then the Project Approval or Subsequent City Approval shall remain subject only to those fees, including without limitation Development Impact Fees and other fees and exactions, and fee amounts which are in effect at the time of the Effective Date. However, such fee amounts shall not be subject to adjustment for inflation and deflation during any such legal challenge, but rather shall be subject to adjustment based upon the U.S. Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for the Bay Area (San Francisco-Oakland-Hayward), not seasonally adjusted, beginning on the date that such legal challenge is resolved, including without limitation through settlement or adjudication by a court at law, such that the Project is permitted to move forward with development under the Project Approval or Subsequent City Approval, as applicable ("Resolution").

To the extent the City subsequently repeals or otherwise reduces a Development Impact Fee in existence at the time of the Effective Date, said fee shall be reduced or no longer apply to the Project.

Section 3.6. Timing of Payment for Fair Share Fees. Any fair share fees paid by the District, including without limitation Fair Share Fees paid towards utilities, streets, improvements, and services benefiting members of the public in addition to future Project residents. will be based on the Project's proportional impacts that contribute to the public's needs for such utilities and streets, as provided for in the Mitigation Fee Act, the federal and state constitutions, and other applicable law, and the parties agree such fees shall be calculated based on methodologies vested pursuant to this Agreement unless waived by the District and shall be paid at the time of issuance of building permit on a building-by-building basis. The amount of all Fair Share Fees imposed on the Project shall be subject to Section 3.5.

Section 3.7. City Pass Through Fees. Sections 3.5 and 3.6 of the Agreement shall not apply to any City fees that are pass-through fees from non-City governmental agencies. For any Project Approvals or Subsequent City Approvals that incur a pass-through fee, the District shall pay the fee lawfully required for all similarly situated projects at the time of the approval, permit, or entitlement. As used in this section, a "pass-through fee" refers to any fee, the amount of which is set by a non-City governmental agency, and is either collected by the City for the purposes of transmitting to that same non-City governmental agency or is collected by the City for the purposes of recouping payments in the fee amount already made by the City to the non-City governmental agency.

Section 3.8. Other Governmental Permits. At its sole expense, District shall apply for and obtain such other permits and approvals, including without limitation Project Approvals, as may be required from other governmental or quasi-governmental agencies having jurisdiction over the Project as may be required for the development of, or provision of services to, the Project consistent with this Agreement. City shall cooperate in good faith with District to obtain such permits and approvals.

Section 3.9. Application, Processing, and Inspection fees. All Subsequent City Approvals shall be subject to generally applicable application, processing, and inspection fees in effect at the time the Subsequent City Approvals are issued or, if any such fees are due prior to issuance thereof, at the time the application(s) for such Subsequent City Approvals is/are filed.

Section 3.10. Construction Codes. Ordinances establishing construction requirements and specifications, including without limitation the California Building Code, California Energy Code,

California Green Building Standards, California Electrical Code, California Plumbing Code, California Fire Code, and California Mechanical Code, which are adopted or revised during the term of this Agreement shall apply as of the time of granting construction and building permits for development of the Project.

Section 3.11. State and Federal Requirements. This Agreement shall not preclude the application of changes in Ordinances, the terms of which are specifically mandated and required by changes in State or Federal laws or regulations as provided in Government Code section 65869.5, to the development and use of the Project Site. In the event that State or Federal laws, or regulations enacted after the Effective Date of this Agreement, or actions by any governmental jurisdiction other than City, prevent or preclude compliance with one or more provisions of this Agreement, or require changes in Project Approvals or Subsequent City Approvals issued by City, this Agreement shall be modified, extended or suspended to the extent reasonably necessary to comply with such State or Federal laws or regulations.

Section 3.12. District's Obligations. The District's Obligations with respect to community benefits shall be the construction and financing of public improvements and the operation of the Head Start Preschool as set forth in Exhibits C and D to this Agreement. The terms therein are incorporated into this Agreement and subject to the terms herein; in the event of a conflict, the terms in Exhibits C and D shall prevail. The District shall also implement the environmental mitigations and monitoring programs to be undertaken in connection with the development of the Project Site as set forth in Exhibit [H] to this Agreement. The amounts of the monetary payments to be made by District for constructions and financings, benefits, and environmental mitigations and monitoring programs under this Agreement are those amounts set forth in Exhibits C, D, and G. Notwithstanding anything else in this Agreement, the parties agree that the District's enjoyment of rights in the Tentative Affordable Housing Plan are material to the implementation of the Project and that failure to realize the foregoing rights, including without limitation through finalization of the Tentative Affordable Housing Plan through the Affordable Housing Plan and/or the Inclusionary Housing Agreement, shall relieve the District from any and all obligations to provide the community benefits identified in this Agreement and its Exhibits.

If any Project Approval or Subsequent City Approval is subject to a legal challenge prior to the expiration of the statute of limitations to challenge either approval, the amount of the monetary payments to be made by District for constructions and financings, benefits, and environmental mitigations and monitoring programs under this Agreement shall remain those amounts set forth in Exhibits C, D, and G. However, to the extent such payments are subject to adjustment for inflation pursuant to the terms of this Agreement, such payment amounts shall not be subject to adjustment for inflation and deflation during any such legal challenge, but rather shall be subject to adjustment based upon the U.S. Bureau of Labor Statistics Consumer Price Index for All Urban Consumers (CPI-U) for the Bay Area (San Francisco-Oakland-Hayward), not seasonally adjusted, beginning on the date of Resolution.

Notwithstanding anything else in this Agreement, if any Project Approval or Subsequent City Approval is subject to a legal challenge prior to the expiration of the statute of limitations to challenge any approval, then the District shall have no obligation to construct, finance, design, or otherwise implement any of the public improvements or responsibilities set forth in Exhibits C and D to this Agreement until the date of Resolution. In the case of such a legal challenge, any relevant time periods for construction, finance, design, or implementation of an any of the public improvements or responsibilities set forth in Exhibits C and D to this Agreement shall be tolled until the date of Resolution. The District shall have the right to terminate this Agreement at any time prior to the District's commencement of construction of the Project's first residential unit.

The provision of affordable housing throughout the Project shall be governed by the Tentative Affordable Housing Plan, as set forth in Exhibit E to this Agreement. Upon approval of the Project, the Tentative Affordable Housing Plan will be finalized by City staff and memorialized in an Inclusionary Housing Agreement pursuant to Daly City Municipal Code Section 17.47.140. The finalized Affordable Housing Plan and Inclusionary Housing Agreement shall be separate and independent from this Agreement, but their terms shall be in substantial compliance with the Tentative Affordable Housing Plan, and there shall be no substantive differences.

The maximum buildout of the site will be in accordance with the maximum allowable levels identified in the Precise Plan, Exhibit F to this Agreement, except to the extent the District seeks, and the City approves, an amendment thereto. Though the Precise Plan for the Project is a vested element per the terms of this Agreement, it is adopted pursuant to Daly City Municipal Code Chapter 17.28 as a land use entitlement separate from this Agreement. The parties acknowledge that District cannot at this time predict whether Project buildout will occur to the maximum allowable levels identified in the Precise Plan. Future decisions with respect to actual Project buildout will depend upon a number of circumstances not entirely within the control of District, including without limitation housing demand, construction costs, and financial market conditions. Decisions with respect to the extent of future Project buildout shall be within the exercise of District's good judgment, so long as the Project is developed in accordance with the provisions of this Agreement and the other Project Approvals. This section does not limit or modify the procedures and remedies described in Article 4.

Provision of parking spaces on the Project Site is a community benefit and shall be provided pursuant to the Precise Plan for the Term of the Agreement, subject to State law, including, but not limited to Government Code section 65863.2, limiting the enforcement of parking minimums for development projects proximate to public transit. Following development of any portion of the Project Site and for the Term of the Agreement, the District shall be responsible for enforcement of any parking rules on that portion of the Project Site.

Section 3.13. General Provisions with Respect to Financing Public Infrastructure or Providing Public Services. To the extent any provision of public infrastructure or public service is not a negotiated benefit of this Agreement included in Exhibit C or D, District shall be entitled to reimbursement for amounts exceeding its fair share contribution to the subject public infrastructure or public service in accordance with the Mitigation Fee Act, the federal and state constitutions, and other applicable law. Except as otherwise provided in Exhibit C, which governs the terms of reimbursement for certain Intersection Improvements, City agrees to cooperate in good faith in exploring the use of reimbursement agreements and/or public financing mechanisms for the provision of public infrastructure or public services relating to the Project Site that comport with applicable local, state, and federal laws.

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ARTICLE 4: PERIODIC REVIEW OF AGREEMENT

Pursuant to Government Code Section 65865.1, the City's Planning Manager shall conduct an annual review of this Agreement to ascertain the parties' good faith compliance with its terms. Upon request, the District shall provide the City's Planning Manager with information reasonably necessary to carry out this determination. If the Planning Manager finds, after an administrative review, that the District is in good faith compliance with this Agreement, the Planning Manager shall issue the District a certificate of compliance. If the Planning Manager finds District is not in good faith compliance with this Agreement, then the Planning Manager shall notify the District and schedule a noticed public hearing with the City Council to consider the alleged non-compliance. If after such hearing the City Council determines the District is not in good faith compliance with this Agreement, City may pursue available rights and remedies in accordance with this Agreement. If the Planning Manager does not initiate an annual review in any given year, the District shall be deemed to be in good faith compliance with this Agreement.

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ARTICLE 5: AMENDMENT

Section 5.1. In General. This Agreement may be canceled, modified or amended only by mutual written consent of the parties, in accordance with the provisions of Government Code Sections 65867, 65867.5 and 65868. No amendment shall disturb the vesting date, scope, or other element of the rights vested under Article 3 of this Agreement.

Section 5.2. Major Amendments. Any amendment to this Agreement concerning the monetary amounts due for Public Circulation Improvements in Exhibit C, the legal boundaries of the Project Site as depicted in Exhibits A and B, the District's obligations as stated in Section 3.12, or the Agreement's provisions regarding fees and exactions in Section 3.5 shall be considered a Major Amendment, and shall require giving of notice and shall require a public hearing before the Planning Commission and City Council pursuant to the provisions of Section 5.1 above. Any amendment to the Precise Plan, the Tentative Affordable Housing Plan, or any of the Project Approvals shall be governed by the terms of those documents and shall not require any amendment to this Agreement.

Section 5.3. Minor Amendments. The parties acknowledge that refinement and further implementation of the Project might demonstrate that certain minor changes might be appropriate with respect to the details and performance of the parties under this Agreement. The parties desire to retain a certain degree of flexibility with respect to the details of the Project and with respect to those items covered in the general terms of this Agreement. If and when the parties find that clarifications, minor changes, or minor adjustments are necessary and do not constitute a Major Amendment under Section 5.2, they shall effectuate such clarifications, minor changes, or minor adjustments through a written Minor Amendment approved in writing by the District and the City Manager. Unless otherwise required by law, no such Minor Amendment shall require prior notice or hearings, nor shall it constitute an amendment to this Agreement as defined by the Government Code.

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ARTICLE 6: GENERAL PROVISIONS

Section 6.1. Covenants. The provisions of this Agreement shall constitute covenants or servitudes which shall run with the land comprising the Project Site, and the burdens and benefits hereof shall bind and inure to the benefit of all estates and interests in the Project Site and all successors in interest to the parties hereto.

Section 6.2. Term. The Term of this Agreement shall commence upon the Effective Date and extend until the later of (a) the expiration of thirty (30) years after the Effective Date or (b) the issuance of the final certificate of occupancy for any Project Approval or Subsequent City Approval insofar as the District has submitted such permit application to the Planning Department for review and approval prior to the expiration of thirty (30) years after the Effective Date and such permit application is still undergoing review on the expiration of thirty (30) years after the Effective Date.

Notwithstanding the foregoing, the Term of this Agreement shall be automatically extended for the period that development is prevented or delayed, in whole or in part, due to a Force Majeure Event. At any time, any party claiming an extension as a result of a Force Majeure Event shall provide the other party with written notice of such extension, the reason for the delay and an estimated length of delay. Upon the other party's receipt of such notice, the period of time for performance of any obligation or duty shall be automatically extended for the period of the Force Majeure Event, unless the other party objects in writing within thirty (30) days after receiving the notice. In the event of such objection, the parties shall meet and confer within thirty (30) days after the date of objection to arrive at a mutually acceptable solution to the disagreement regarding the delay. If no mutually acceptable solution is reached at the conclusion of the meet and confer session(s), either Party may initiate dispute resolution proceedings as set forth in Section 6.7 of this Agreement.

The Term may also be extended upon mutual written consent by both parties.

Expiration of this Agreement shall have no legal effect on any other Project Approval, including, but not limited to the Precise Plan, the Tentative Affordable Housing Plan, and their applicability to the Project.

Section 6.3. Default: Remedies; Termination. Failure or unreasonable delay by either party to perform any obligation under this Agreement for a period of thirty (30) days after written notice thereof from the other party shall constitute a default under this Agreement, subject to extensions of time by mutual consent in writing. Said notice shall specify the nature of the alleged default and the manner in which said default may be satisfactorily cured. If the nature of the alleged default is such that it cannot reasonably be cured within such thirty (30) day period, the commencement of the cure within such time period and the diligent prosecution to completion of the cure shall be deemed a cure within such period.

Subject to the prior paragraph, after notice and expiration of the thirty (30) day period without cure, the other party to this Agreement, at its option, may institute legal proceedings pursuant to this Agreement and/or give notice of intent to terminate the Agreement pursuant to Government Code Section 65868. Following such any City notice of intent to terminate, the matter shall be scheduled for consideration and review by the City Council within thirty (30) calendar days in the manner set forth in Government Code Sections 65865.1, 65867 and 65868. Following consideration of the evidence presented in said review before the City Council, and a

determination by the City Council based thereon, the City may give written notice of termination of this Agreement to the other party.

If any Parcel, or a duly subdivided portion thereof ("Portion") has completed Conformance Review or Design Review pursuant to the Precise Plan and received such approval (an "Approved Portion" or "Approved Parcel", as applicable), then any default under this Agreement that is not directly related to such Approved Portion or Approved Parcel shall not limit or otherwise affect any rights, privileges or remedies appurtenant to that Approved Portion or Approved Parcel (and no such default proceedings shall affect it). Where a default under this Agreement arises from operations on an Approved Portion or Approved Parcel of the Project, then (a) the enforcement and remedies for such default shall be limited to the Approved Portion or Approved Parcel that is causing the default, and (b) all such remedies shall be limited to: (i) specific performance or injunctive relief (and the right to recover reasonable attorney's fees in connection with such proceedings); and (ii) provisional remedies to protect the interests of the parties. For any default relating to the Project that is not an Approved Portion or Approved Parcel, any such remedies shall be limited to: (i) specific performance, injunctive or declaratory relief (and the right to recover reasonable attorney's fees in connection with such proceedings); and (ii) provisional remedies to protect the interests of the parties. The waiver by either party of any default under this Agreement shall not operate as a waiver of any subsequent breach of the same or any other provision of this Agreement.

Section 6.4. Enforced Delay: Extension of Time of Performance. In addition to specific provisions of this Agreement, performance by either party hereunder shall not be deemed to be in default where delays or defaults are due a Force Majeure Event. If written notice of such delay is given to either party within forty-five (45) days of the commencement of such delay, an extension of time for such cause will be granted in writing for the period caused by the Force Majeure Event, or longer as may be mutually agreed upon.

Section 6.5. Cooperation in the Event of Third-Party Legal Challenge. In the event of any legal or equitable action or proceeding instituted by a third party challenging the validity of any provision of this Agreement or the procedures leading to its adoption or the issuance of Project Approvals or Subsequent City Approvals for the Project, the parties hereby agree to cooperate in defending said action or proceeding.

Section 6.6. Effect of Termination. Except as otherwise provided in this Agreement, termination of this Agreement shall not affect District's obligation to comply with the standards, terms and conditions of any Project Approvals or Subsequent City Approvals issued with respect to the Project Site or any portion thereof; nor shall it affect any covenants of District which are specified in this Agreement to continue after termination.

The following provisions of this Agreement shall survive and remain in effect following termination or cancellation of this Agreement for so long as necessary to give them full force and effect: (1) Section 6.5 (Cooperation in the Event of Third-Party Legal Challenge) and (2) Section 6.7 (Legal Actions Remedies; Attorney's Fees).

Termination of this Agreement shall have no legal effect on any other Project Approval, including, but not limited to the Precise Plan or the Tentative Affordable Housing Plan.

Section 6.7. Legal Actions: Remedies; Attorney's Fees. Subject to the provisions of Section 6.3, in addition to any other rights and remedies, either party may institute legal action to cure, correct, or remedy any default, enforce any covenant or agreement herein, and enjoin any threatened or

attempted violation or enforce by specific performance the obligations and rights of the parties hereto. In no event shall either party or its officers, agents or employees be liable for monetary or other damages for any breach or violation of this Agreement, it being expressly understood and agreed that the sole legal remedy available to either party for a breach or violation of this Agreement by the other party shall be a legal action in mandamus, specific performance, injunctive or declaratory relief to enforce the provisions of this Agreement. In any such legal action, the prevailing party shall be entitled to recover all litigation expenses, including reasonable attorney's fees and court costs.

Section 6.8. Construction of Agreement. This Agreement shall be construed and enforced in accordance with the laws of the State of California and City, as they may be amended, provided that such amendments do not substantially alter the rights granted to the parties by this Agreement. Both parties and their legal counsel have reviewed this Agreement and agree that any rule that ambiguities are to be construed against the drafting party shall not apply. This Agreement, including the text and alt exhibits hereto, is intended to be interpreted as an integrated whole. Where provisions appear to be in conflict, they will be harmonized if possible. In the event that an irreconcilable conflict exists between the Agreement text and one or more of the exhibits, the text shall control.

Section 6.9. No Joint Venture, Partnership or Agency. It is specifically understood and agreed by City and District that the development of the Project Site according to the Development Plan is a non-City development. No partnership, joint venture, agency or other association of any kind between City and District is formed by this Agreement. The only relationship between City and District is that of a governmental entity regulating the development. City and District agree that nothing contained herein or in any document executed in connection herewith shall be construed as making City and District joint venturers, partners or agents of one another.

Section 6.10. Severability. If any term, provision, covenant or condition of this Agreement is held by a court of competent jurisdiction to be invalid, void or unenforceable, the remaining provisions of this Agreement shall continue in full force and effect.

Section 6.11. Further Documents. Each of the parties shall cooperate with and provide reasonable assistance to the other to the extent contemplated hereunder in the performance of all obligations under this Agreement and the satisfaction of the conditions of this Agreement. Upon the request of either party at any time, the other party shall promptly execute, with acknowledgment or affidavit if reasonably required, and file or record such required instruments and writings and take any actions as may be reasonably necessary under the terms of this Agreement to carry out the intent and to fulfill the provisions of this Agreement.

Section 6.12. Notices. Any notice or communication required hereunder between City or District must be in writing, and may be given either personally or by registered or certified mail, return receipt requested. If given by registered or certified mail, the same shall be deemed to have been given and received on the first to occur of (i) actual receipt by any of the addressees designated below as the party to whom notices are to be sent, or (ii) five (5) days after a registered or certified letter containing such notice, properly addressed, with postage prepaid, is deposited in the United States mail. If personally delivered, a notice shall be deemed to have been given when delivered to the party to whom it is addressed. Any party hereto may at any time, by giving ten (10) days' written notice to the other party hereto, designate any other address in substitution of the address to which such notice or communication shall be given. Such notices or communications shall be given to the parties at their addresses set forth on the below:

City: City of Daly City
333 90th Street
Daly City, CA 94015
Attn: City Manager

with a copy to: City of Daly City
333 90th Street
Daly City, CA 94015
Attn: City Attorney

District: Jefferson Union High School District
699 Serramonte Boulevard
Suite 100
Daly City, CA 94015-4132
Attn: Superintendent and Associate
Superintendent/Chief Business Official

with a copy to: Office of the San Mateo County Counsel
400 County Center, 6th Floor
Redwood City, CA 94063
Attn: County Counsel

Section 6.13. Assignment. The rights and obligations of District hereunder shall not be assigned or transferred, except that on thirty (30) days written notice to City, District may assign all or a portion of District's rights and obligations thereunder to any person or persons, partnership or corporation who purchases all or a portion of District's right, title and interest in the Project, provided such assignee or grantee assumes in writing each and every obligation of District hereunder yet to be performed with respect to the assigned portion of the Project, and such assignees or grantees shall have the same assignment and transfer rights and obligations. The notice to City shall include the identity of any such assignee or grantee and a copy of the written assumption of the assignor's or grantor's obligations hereunder pertaining to the portion assigned or transferred. After such notice, the assignor or grantor shall have no further obligations or liabilities hereunder. Notice under this Section shall not be required for an assignment or transfer resulting from a restructuring or name change involving District and affiliated entities, so long as there is no substantial change in the management or control of District. Notwithstanding anything in this Agreement, the District may implement its obligations under this Agreement through the use of District employees, representatives, agents, contractees, and other third parties selected by the District.

Section 6.14. Authorized Applicants for Project Approvals. Notwithstanding anything else in this Agreement, the following may apply for Subsequent City Approvals: successors, assignees, or grantees of the District; and any third party with the written consent of the District, including without limitation any agents, joint development partners, lessees, licensees, or sublessees.

Section 6.15. Right to Lease Project Facilities. Notwithstanding anything else in this Agreement, the parties acknowledge and agree that District, as owner of the real estate, has the right to lease or license any portion of the real estate situated at the Project (each a "Project Component") to affiliated or third parties for any purpose consistent with the terms of this Agreement, including, but not limited to constructing, operating, subleasing, and any other use related to uses permitted under the Precise Plan. Any such lease, license, or sublease of a Project Component will not require any notification to or consent by the City provided that the tenant or occupant is required,

in the subject lease, license, or sublease, to comply with the obligations and requirements of this Agreement that would be applicable to the Parcel (or Portion) occupied or used by such tenant, licensee or occupant. The District shall ensure that any third party engaged by the District to construct and/or operate the developments on Parcel C or a Portion of Parcel C ("Parcel C Developer") is aware of the provisions regarding the Head Start Program included in Exhibit D. The parties agree that, if the District and a third party enter into a lease or license (or like rights to use and operate) for a Project Component on a Parcel or any Portion thereof (each a "Parcel Interest"), and the Project Component has qualified as an Approved Portion or an Approved Parcel, then if a default occurs that is caused by the use or operation of the Parcel Interest, then any enforcement or remedy for such default other than specific enforcement, declaratory relief and any attorney's fees and costs for such proceedings, shall be further subordinated to the interests of any ground lease tenant, leasehold mortgagee or other interest holder in the Parcel Interest, and the City will enter into a subordination agreement confirming such subordination in the form reasonably required by the holder of such Parcel Interest.

Section 6.16. Entire Agreement. This written Agreement, including the exhibits hereto, contains all the representations and the entire agreement between the parties with respect to the subject matter hereof. Except as otherwise specified in this Agreement, any prior correspondence, drafts, memoranda, agreements, warranties or representations are superseded in total by this Agreement. This Agreement also supersedes any previous development agreements or other agreements that may affect or govern the Project Site or its development.

Section 6.17. No Third Party Beneficiaries. This Agreement shall not be construed to be an agreement for the benefit of any third party or parties and no third party or parties shall have any claim or right of action under this Agreement, including without limitation its Exhibits, for any cause whatsoever.

Section 6.18. Recitals Not Incorporated. The Recitals preceding this Agreement are not incorporated into this Agreement and are not part of the representations or the entire agreements between the parties with respect to the subject matter hereof.

Section 6.19. Time of Essence. Time is of the essence in the performance of the provisions of this Agreement as to which time is an element.

Section 6.20. Warranty of Authority. The person(s) executing this Agreement on behalf of each of the parties hereto represent and warrant that (i) such party, if not an individual, is duly organized and existing, (ii) they are duly authorized to execute and deliver this Agreement on behalf of said party, (iii) by so executing this Agreement such party is formally bound to the provisions of this Agreement, and (iv) the entering into this Agreement does not violate any provision of any other agreement to which such party is bound.

Section 6.21. Counterparts. This Agreement may be executed in multiple counterparts, each of which shall be deemed an original Agreement, and all of which shall constitute one and the same Agreement.

Section 6.22. Recordation. Within ten (10) days after the Enacting Ordinance takes effect, the City Manager shall execute this Agreement on behalf of City, and the City Clerk shall record this Agreement with the San Mateo County Recorder. If this Agreement is terminated, modified or amended pursuant to Article 4 or 5 of this Agreement, the City Clerk shall record notice of such action with the San Mateo County Recorder.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the day and year first set forth above.

[SIGNATURE BLOCKS TO FOLLOW]

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EXHIBIT A [PLACEHOLDER]

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EXHIBIT B [PLACEHOLDER]

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EXHIBIT C

PUBLIC CIRCULATION IMPROVEMENTS

The provisions included in Sections [1-5] of this Exhibit C are the Public Circulation Improvements. Pursuant to Section 3.12 of the Agreement, the Public Circulation Improvements are included in the District's obligations under the Agreement, and constitute a portion of the community benefits that the District shall provide. The provisions in this Exhibit C are incorporated into the Agreement and subject to the terms therein; in the event of a conflict, the provisions in this Exhibit C shall prevail. The Definitions of Article 1 of the Agreement shall apply to this Exhibit C. Where a word or phrase is specifically defined in this Exhibit C, that definition shall apply only to Exhibit C.

1. Sidewalk and Retaining Wall Improvements on Callan Boulevard

1.1 The District shall be responsible for certain improvements to existing sidewalk along Callan Boulevard, fronting a portion of Parcel B, Parcel C, and Parcel D, as described in this Section. The District shall implement the work and pay for the costs for design, permitting, and repair or construction as described in this section.

1.2 Consistent with Chapter 12.16 of the Existing Ordinances], the District shall ensure the existing sidewalk will be repaired along the 740' length identified in **Figure 1**.

1.3 The District shall widen the existing sidewalk at three (3) locations along the seven hundred and forty feet (740') frontage, from Serramonte Boulevard to the southern edge of Parcel C, such that the sidewalk spans the entire length of Parcels B, C, and D, consistent with **Figure 1**. The three locations will be distributed evenly among the Parcel B, C, and D frontages, and will create three passing zones for pedestrians approximately eight feet (8') long with a clear width of five feet (5'), at locations to be determined during site improvement permit plan check. Any new sidewalk areas shall conform to specifications consistent with Chapter 12.12 of the then existing ordinances.

1.4 The District will provide a treated lumber retaining wall along the hillside adjacent to the sidewalk as reasonably is determined to be necessary by the District's civil engineer to reduce sloughing of soil onto the sidewalk consistent with the engineering drawing in **Figure 1**). The length of retaining wall that will be needed is estimated at approximately fifty percent (50%) of the seven hundred and forty feet (740') sidewalk, but shall not exceed sixty percent (60%).

1.5 The improvements described in Paragraphs 1.2, 1.3, and 1.4 will be completed on Parcels B, Parcel C, and Parcel D as each building on Parcel B, Parcel C and Parcel D is respectively built. Improvements along the frontage of a particular Parcel must be completed prior to the issuance of a Certificate of Occupancy for any building on that Parcel, and the District shall have no obligation to begin or complete improvements along the frontages of any other Parcel prior to such issuance. City and the District will enter into the City's standard landscape maintenance agreement with reasonable terms for the maintenance of the lumber retaining wall if placed within the City's right-of-way at Callan Boulevard and any hillside areas within the aforesaid right-of-way, which will be recorded against the property fronting the improvements.

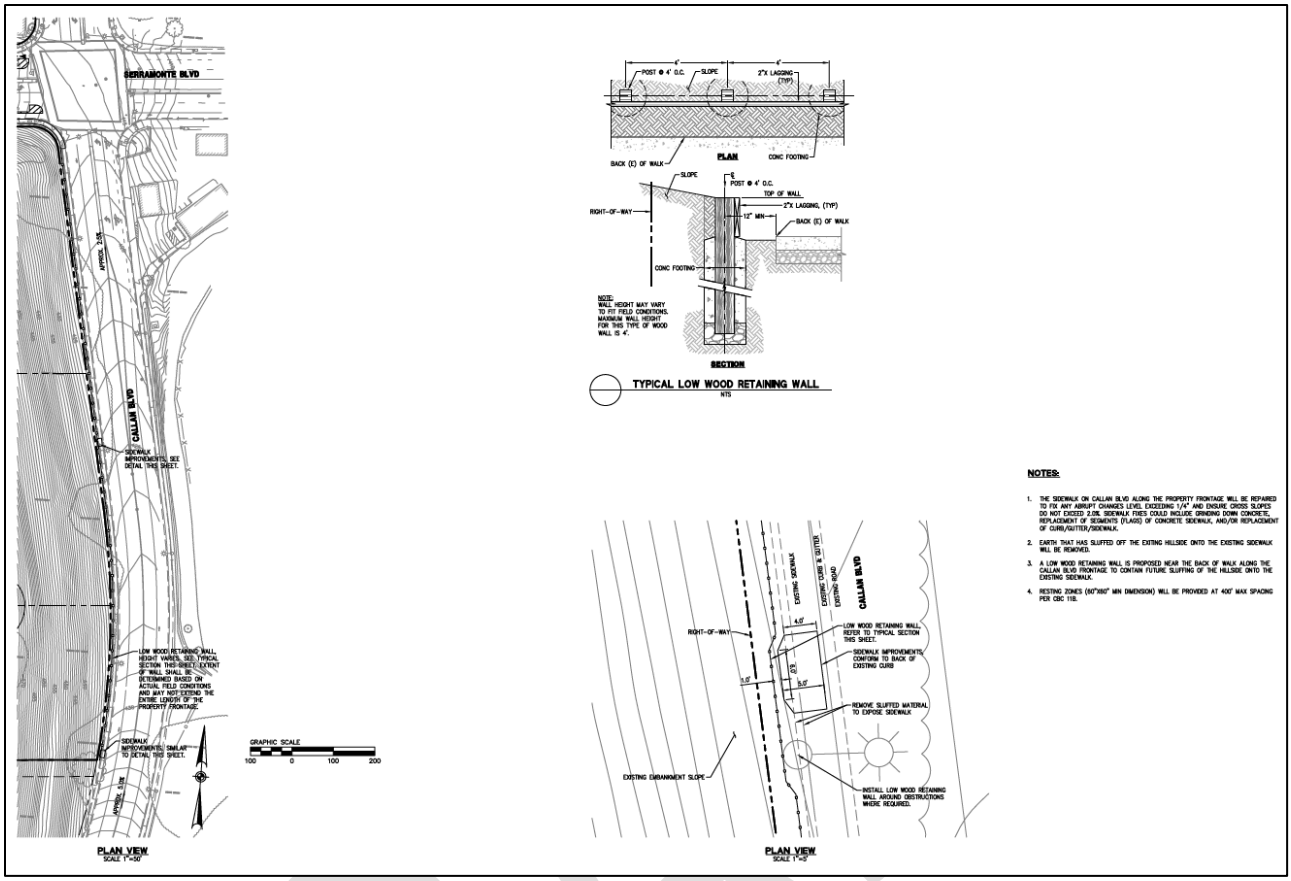

Figure 1: ***The sidewalk and retaining wall improvements described above fronting Callan (Parcels B, C and D).***

2. Serramonte Blvd. / Highway 1 Traffic Signal & Associated Improvements

2.1 The District shall design and construct the traffic signal and certain bicycle and pedestrian improvements at the Highway 1 Ramps/Serramonte Boulevard intersection to the extent such improvements are shown in **Figure 2** below. The work shown in **Figure 2** shall be referred to as the "Intersection Improvements."

Figure 2: ***Intersection Improvements***

2.2 *Payment of Intersection Improvement Costs, Generally.* The District shall pay one hundred percent (100%) of the full Intersection Improvement costs incurred on or after the Effective Date ("Intersection Improvement Costs") in accordance with the terms of this section. The Intersection Improvement Costs shall include:

2.2.1 all direct costs of physically constructing, including labor and material costs related to:

(a) the improvements shown in **Figure 2**, including signal improvements, restriping, median construction, bike lanes construction improvement, bus stop construction or improvement, street widening, sidewalks construction or improvement, and freeway on/off ramps construction or improvement; and

(b) pavement reconstruction to generally applicable, published standards consistent with historical practice, as necessary within the boundaries of the intersection between Entry Drive and the start of Hwy 1 Entry Ramps.

2.2.2 all soft and indirect costs associated with constructing the improvements shown in Figure 2 including, but not limited to architectural, engineering, and design fees, fees and costs related to any applications, legal fees, development management and consultant fees, permit and entitlement fees, administrative expenses, financing costs, taxes.

2.2.3 The City agrees to make good faith efforts to work cooperatively with the District and other agencies to limit the scope of Intersection Improvement Costs.

2.3 *Base Intersection Improvement Costs*. At the time of payment for the Intersection Improvements, District shall be solely responsible for all costs of up to one million, seven hundred

thousand dollars ($1,700,000) as indexed in the month of the Effective Date. This amount shall be escalated at the rate of growth of the DGS California Construction Cost Index ("CCCI") on a monthly basis to account for time between the Effective Date and the time of payment for the Intersection Improvements. (the "Base Intersection Improvement Costs"). However, if any Project Approval or Subsequent City Approval is subject to a legal challenge prior to the expiration of the statute of limitations to challenge such approval, then Base Intersection Improvement Costs shall be equivalent to one million, seven hundred thousand dollars ($1,700,000) as indexed in the month of the date that such legal challenge is resolved, including without limitation through settlement or adjudication by a court at law,, such that the Project is permitted to move forward with development of the Project under the Project Approval or Subsequent City Approval, as applicable (“Resolution”). This amount shall be escalated to reflect the increase in the CCCI between the Resolution date and the time of payment by the District for the Intersection Improvements.

As used throughout this Section, "indexed in the month of" shall refer to the month in which a specified monetary amount shall begin to be escalated by any specified rate or inflator. For example, and strictly by way of example, one hundred dollars ($100) indexed in the month of January 2025 and escalated at the rate of one percent (1%) per month shall be equivalent to one hundred and one dollars ($101) in February 2025, and one hundred and dollars and one cent ($102.1) in March 2025.

2.4 *Additional Intersection Improvement Costs*. For Intersection Improvement Costs in excess of the Base Intersection Improvement Cost set forth in Section 2.2, the District and City shall share such costs equally, in a total amount up to four hundred thousand dollars ($400,000), as indexed in the month of the Effective Date. This amount shall be escalated at the rate of growth of the CCCI (the “Additional Intersection Improvement Costs”). The Additional Intersection Improvement Costs shall result in a maximum base liability of two hundred thousand dollars ($200,000) in liability for each party, in addition to any escalation to account for the CCCI. However, if any Project Approval or Subsequent City Approval is subject to a legal challenge prior to the expiration of the statute of limitations to challenge either approval, then the Additional Intersection Improvement Costs shall be a total amount up to four hundred thousand dollars ($400,000), as indexed in the month of the date of Resolution. Such amount shall be escalated at the rate of growth of the CCCI to account for time between the date of Resolution and the time of payment for the Intersection Improvements. To the extent Intersection Improvements Costs exceed the sum of the Base Intersection Improvement Costs and Additional Intersection Improvements costs, the Parties shall proceed with the obligations set forth in Paragraph 3.6.

> *Illustrative Example:* If the final intersection improvement cost is two million dollars ($2,000,000) plus escalation, the District will pay for the first one million seven hundred thousand dollars ($1,700,000) plus escalation, and the additional three hundred thousand dollars ($300,000) plus escalation will be split with one hundred and fifty thousand dollars ($150,000) plus escalation paid by the Applicant and a reimbursement of one hundred and fifty thousand dollars ($150,000) plus escalation coming from the City.

2.5 *Payment and Reimbursement.* After all required local and State approvals for the Intersection Improvements, but prior to the commencement of construction of the Intersection Improvements, the District shall prepare an estimate of the amount of Intersection Improvement Costs and the time and schedule of Intersection Improvement construction. The District's estimate shall include an identification of the estimated Base Intersection Improvement Costs, and an identification of the estimate of the Additional Intersection Improvement Costs, if any. If the estimate total Intersection Improvement Costs exceeds two million, one hundred thousand dollars

($2,100,000) plus escalation, the parties shall collaborate in good faith in accordance with Section 3.6. If the estimate total Intersection Improvement Costs exceeds the Base Intersection Improvement Costs and includes Additional Intersection Improvement Costs, the District's estimate shall be shared with the City prior to commencement of construction of the Intersection Improvements. The District shall pay the totality of the Base Intersection Improvement Costs and Additional Intersection Improvement Costs consistent with the terms of this Paragraph and Paragraph 2.3. However, to the extent any Additional Intersection Improvements Costs are incurred, the District, after paying such Additional Intersection Improvement Costs, shall invoice the City for payment of the City's share of such Additional Intersection Improvement Costs pursuant to Paragraph 2.4 of this Exhibit ("District Invoice"). The District shall provide the City with a copy of all invoices the District received, identifying actual monies due with respect to the Additional Intersection Improvement Costs ("Supporting Invoices") and the calculation of the additional amount invoiced to account for escalation at the rate of growth of the CCCI as described in Paragraph 2.3. Notwithstanding anything else in the Agreement, including this Exhibit, the City shall reimburse the District for its share of the Additional Intersection Improvement Costs through a monetary payment within sixty (60) days of the District's provision of any District Invoices and any pertinent Supporting Invoices.

2.6 *Excess Costs.* If the total Intersection Improvement Costs exceeds two million, one hundred thousand dollars ($2,100,000) plus escalation ("Excess Costs"), the District shall not be liable for such costs. Both parties agree to collaborate in good faith to reach an agreement on the payment of Excess Costs acceptable to both parties. Additionally, the City agrees to make good faith efforts to work cooperatively with the District and other agencies to limit the scope of project costs and contain project costs. If, during the planning or construction of the Intersection Improvements, the District has a good faith belief that Excess Costs will be incurred, the District may, at its sole option, elect to pause its work on the Intersection Improvements until the parties reach an agreement on Excess Costs acceptable to both parties. If the District pauses work for this reason, failure to complete the Intersection Improvements pursuant to the timing set forth in Paragraph 2.11. shall not be a default of the District's obligations under this Agreement, nor shall it constitute a reason for the City to withhold issuance of any Project Approval or Subsequent City Approval.

2.7 *Credit and Fee Deferral.* The parties agree that each Development within the Project Site, as defined below, shall incur liabilities for a portion of the Intersection Improvement Costs proportional to the number of residential units in each Development, as further detailed in this Paragraph, but that the District's payment of the Intersection Improvement Costs shall entitle the District to certain credits and fee deferrals in accordance with the terms and procedures set forth below:

2.7.1 The following definitions shall apply to this Exhibit:

(a) As used in this Exhibit, "Development" shall mean a residential building constructed on the Project Site, pursuant to the Precise Plan and any amendments thereto. The "Parcel B Development" shall refer to any residential building constructed on Parcel B. The "Parcel C Development, Building A" shall refer to the first residential building constructed on Parcel C. The "Parcel C Development, Building B" shall refer to the second residential building constructed on Parcel C. The "Parcel D Development" shall refer to any residential building constructed on Parcel D. The "Parcel E Development" shall refer to any residential building constructed on Parcel E. The "Parcel F Development" shall refer to any residential building constructed on Parcel F.

(b) As used in this Exhibit, "Triggering Development" shall mean the first Development that receives a Certificate of Occupancy and includes a market-rate housing unit. To the extent that the Parcel C Development is developed as a one hundred percent (100%) affordable housing development, with the exception of up to two (2) manager's units, and the exception of the Relocated Facility (defined in Exhibit D), it shall not be considered a Triggering Development.

(c) The term "affordable housing development" as used in this Exhibit shall mean meeting the definition of "Affordable Housing Project" as defined in Daly City Municipal Code Chapter 17.47.

(d) As used in this Exhibit, "Development Impact Fees" shall have the same meaning as set forth in Section 1.8 of the Agreement.

(e) As used in this Exhibit, the "General Plan Maintenance Fee" means the Daly City Building Division's General Plan Maintenance Fee assessed on new construction, currently set at a value of 0.005 multiplied by the valuation of the building constructed.

2.7.2 The Triggering Development shall pay the entirety of the Intersection Improvement Costs in accordance with Paragraph 2.4 above, and pursuant to the timing for Intersection Improvements set forth in Paragraph 2.8. However, the Triggering Development shall be credited with the amount of the Intersection Improvement Costs paid, less: (1) the Development's pro rata share of the Intersection Improvement Costs, based on the number of units in the Triggering Development as a proportion of total unbuilt units in the Project at its commencement, or one thousand, one hundred and thirteen (1,113) units; and (2) any amounts contributed or reimbursed by the City (the "Credit"). The Credit shall be applied against Development Impact Fee obligations, General Plan Maintenance Fee obligations, and any other applicable fees or exactions assessed on the Triggering Development consistent with the provisions of Article 3 of the Agreement (collectively, "Project Exactions").

2.7.3 If the Credit exceeds the amount of the sum of the Project Exactions, the District and City agree to work in good faith to find other fees or costs to which the remainder of the Credit will apply, or other incentives that could be offered to the Applicant to alleviate the financial burden of the Intersection Improvement Costs. If the District and the City cannot, prior to the issuance of a Certificate of Occupancy for the Triggering Development, identify other fees or costs to be credited against or additional incentives to alleviate the financial burden of the Intersection Improvements on the District, the Credit shall carry over and be applied against Project Exactions assessed on Development(s) subsequent to the Triggering Development. The City shall not delay issuance of the Certificate of Occupancy for the Triggering Development on the basis of any procedures or negotiations contemplated in this Paragraph.

2.7.4 The foregoing Credit system shall function as a fee deferral mechanism. Once the Triggering Development has received a Certificate of Occupancy, then whenever any subsequent Development receives its Certificate of Occupancy, that Development shall pay to the City its pro rata share of the Intersection Improvement Costs. For the Parcel C Development, if all of the housing developed on Parcel C is developed as one hundred percent (100%) affordable housing developments, with the exception of up to two (2) manager's units and the exception of the Relocated Facility for the Head Start program (see Exhibit D), and a Certificate of Occupancy for such housing is issued prior to the Triggering Development, then the pro rata share for that Development shall be paid at the time the Triggering Development receives its Certificate of Occupancy. If the final count of newly constructed units in the Project is less than

the anticipated total of one thousand, one hundred and thirteen (1,113) newly constructed units, then the final Development to receive a Certificate of Occupancy shall pay the remaining amount due to account for the entirety of the Intersection Improvement Costs regardless of that Development's pro rata share.

> *Illustrative Example*. In this example, the Parcel B Development consists of 201 units, and is the first Development to include a market-rate housing unit. The total number of unbuilt residential units prior to the construction of the Parcel B Development is expected to be one thousand, one hundred and thirteen (1,113).
>
> Therefore, the Parcel B Development is the Triggering Development and the District is obligated to pay the entirety of the Intersection Improvement Costs in connection with the Parcel B Development, regardless of the pro rata share of the costs attributable to the units in the Parcel B Development.
>
> If the entirety of the Intersection Improvement Costs is one million, three hundred fifty thousand dollars ($1,350,000), then the pro rata share of the Intersection Improvement Cost is two hundred forty three thousand, eight hundred dollars ($243,800). The difference between the Intersection Improvement Cost and the pro rata share is one million, one hundred and six thousand, and two hundred dollars ($1,106,200) and is the Credit, or the amount that is credited to the Parcel B Development and will be used to offset the Development Impact Fees and General Plan Maintenance Fees levied on the Parcel B Development. If this collective fee liability is six hundred and six thousand, two hundred dollars ($606,200), the unapplied Credit amount would be five hundred thousand dollars ($500,000). The District and City would work together in good faith to find other fees or costs to which the credit will apply, or other incentives that could be offered to the Applicant to alleviate the financial burden of the Intersection Improvement Cost. If the parties in this example found no such mechanisms to alleviate the financial burden of the Intersection Improvement Cost, the City would be obligated to extend the unapplied Credit amount of five hundred thousand dollars ($500,000) to Project Exactions associated with the subsequent Project Development.
>
> Each subsequent Development shall incur a pro rata share of the Intersection Improvement Costs which shall be paid to the City upon the issuance of a Certificate of Occupancy for that subsequent Development.

2.8 *Timing of Improvements*. The District shall commence design work on the Intersection Improvements at its sole discretion, but no later than the start of construction of the Triggering Development. The District shall commence construction on the Intersection Improvements at its sole discretion, but no later than three months after the issuance of the Certificate of Occupancy of the Triggering Development.

3. Serramonte Blvd. Pavement Reconstruction

3.1 City and District agree that the construction haul routes for the Project shall be as shown below in **Figure 4**. City will apply a Condition of Approval for the Project to require that this truck haul route be followed by contractors associated with the Project. For the purposes of this item, trucks are defined as large heavy duty construction trucks carrying out functions such as off-hauling and large deliveries of materials. No trucks will be allowed on Serramonte Boulevard

outside of the intersection with Entry Drive, and no other City streets other than those shown in Figure 4 are anticipated to be used as a truck haul route.

***Figure 4**: Contractor Truck Haul Route for Construction*

3.2 Construction trucks shall cross between the Project Site and the Highway 1 on-ramp and off-ramp located directly North of the Project Site, as shown in Figure 4, through the Serramonte Blvd intersection with Entry Drive. Following the conclusion of Project construction, the District shall repair pavement directly damaged by trucks crossing through the intersection of Serramonte Boulevard and Entry Drive. Repair of the pavement directly damaged by trucks shall be to generally applicable, published standards consistent with historical practice.

3.2.1 As used in this Section, "Highway 1" refers to the existing Highway 1 north-south freeway located north of the Project Site.

3.2.2 As used in this Section, "Serramonte Boulevard" refers to the four-lane east-west arterial street named Serramonte Boulevard in Daly City that extends from St. Francis Boulevard to the west to El Camino Real to the east, and passes directly North of the Project Site.

4. Contribution to City Park, Bicycle or Pedestrian Improvements

4.1 The District shall pay three hundred thousand dollars ($300,000) to the City to implement park, bicycle and/or pedestrian improvements. The City shall use the funds toward municipal projects related to park, bicycle and/or pedestrian improvements, as determined at the City's discretion.

4.2 The District shall make the payments described in Paragraph 4.1 pursuant to the below schedule of payment, with payments due upon issuance of the Certificate of Occupancy for particular Developments on the Project Site, as defined in Paragraph 2.6 of this Exhibit. Unit counts for each Development are included in the schedule below to illustrate the proportional allocation of costs, but the District shall pay the listed amount for each Development regardless of the final unit count. No escalations shall be applied to the amounts listed in the schedule of payment, and the District shall pay the exact amounts listed.

Development	Unit Count	Percentage of Total	Allocation of Payment
Parcel B Development	201	18%	$54,000
Parcel C Development, Building A	63	6%	$17,000
Parcel C Development, Building B	89	8%	$24,000
Parcel D Development	200	18%	$54,000
Parcel E Development	280	25%	$75,000
Parcel F Development	280	25%	$76,000
Total	**1,113**	**100%**	**$300,000**

5. Off-site Intersection Improvements

5.1 The District shall fund and implement the improvements related to signal timing optimization (Item A) and striping (Items B, C, and D) in accordance with the table below.

The improvements in the table below are improvements listed on pages 69-70 of the TIA dated July 2022 and have been updated to reflect the Agreed Improvements. The City finds the TIA Improvements are not necessary to mitigate impacts of the Project, and only the improvements listed in the Agreed Improvement column will be implemented by the District, and no other improvements from the TIA Recommendation column or on pages 69-70 will be implemented by the District.

DA Improvement Label	TIA Intersection Number	Intersection	TIA Improvement	Agreed Improvement
A	5	Callan Blvd / Serramonte Blvd	Optimize Signal Timing	Optimize Signal Timing
B	4	Highway 1 Ramps / Serramonte Blvd	Lengthen WBL pocket to 350ft	Lengthen WBL pocket to 150ft by modifying striping only
C	10	Skyline Blvd / Hickey Blvd	Lengthen NBL lane to 300ft	Lengthen NBL lane to 50ft by restriping NB approach
D	12	Callan Blvd / Hickey Blvd	Lengthen NBL lane to 250ft	Lengthen NBL lane to 100ft by modifying striping

These improvements will be made prior to the issuance of the Certificate of Occupancy of the building containing the 500th unit excluding Parcel A

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EXHIBIT D

HEAD START PRESCHOOL OPERATIONS

The provisions included in this Exhibit D are the Head Start Preschool Operations.

Exhibit D includes a Background Section (Section 1) which sets forth the mutual understanding of the parties, and a Provisions Section (Section 2), which sets forth the obligations of the parties.

Pursuant to Section 3.12 of the Agreement, the Provisions Section of Exhibit D is included in the District's obligations under the Agreement and constitutes a portion of the community benefits that the District shall provide. The Provisions in this Exhibit D are incorporated into the Agreement and subject to the terms therein; in the event of a conflict, the Provisions in this Exhibit D shall prevail. The Definitions of Article 1 of the Agreement shall apply to this Exhibit D, except that where a word or phrase is specifically defined in this Exhibit D, that definition shall apply, but only as used in this Exhibit D.

1. Background

1.1 Current Operations. A Head Start Preschool operated by Izzi Early Education ("Head Start Program") is currently located within the Project Site at 699 Serramonte Boulevard ("Existing HS Site"). The Existing HS Site facility encompasses approximately 2,800 square feet and serves no more than approximately forty (40) children at any given time. The parties agree and understand the Head Start Program shall have to be relocated to facilitate development of the Project Site.

1.2 Preference of Location. The parties understand that the non-binding preference of the City and the Head Start Program is to relocate the Head Start Program to Parcel C on the Project Site.

1.3 Preference of Scale. The parties desire that the relocated facility for the Head Start Program shall be of comparable scale as the existing facility, both in terms of facility size and students served.

2. Provisions

2.1 Definitions.

2.1.1 As used in this Exhibit, "Parcel C Affordable Housing Developer" shall refer to any third-party entity to which the District leases, licenses, or otherwise conveys all or any portion of the real property comprising Parcel C of the Project Site for the purpose of constructing, developing, or operating any residential or commercial buildings thereupon that constitute the initial development of Parcel C under this Agreement.

2.1.2 As used in this Exhibit, the "Relocated Facility" shall refer to any building, structure, or portion of a building or structure on the Project Site that in the future will be used for the operations of the Head Start Program (or alternate program referenced in Section 2.4, below) other than the Existing HS Site. The Relocated Facility shall not exceed 2,800 square feet and is meant to allow for operations of a comparable scale to current operations described in Paragraph 1.1.

2.1.3 As used in this Exhibit, "Warm Shell Condition" shall mean a space or facility that has finished-dry-walled, paint-ready perimeter walls; HVAC (heating, ventilating, and air conditioning); a stubbed domestic water line; ceilings with standard insulation; ceiling lighting; temporary life safety systems to the extent required by applicable law; live fire sprinklers to the extent required by applicable law; the minimum code required restroom(s) with basic relative commercial grade finishes; plumbing; outlets; and floors without finished materials (e.g., carpeting, staining).

2.2 Relocation Provisions.

2.2.1 Relocation Assistance to Parcels Other than Parcel C. Pursuant to Paragraph 2.2.5 of this Exhibit, if the District determines that the Relocated Facility will be relocated to a parcel on the Project Site other than Parcel C, the District's obligations are limited to (i) cooperating in facilitating the permitting and approval process to allow such use of the targeted Relocated Facility, and (ii) cooperating with the developer to provide the Relocated Facility of not more than 2,800 square feet in a Warm Shell Condition.

2.2.2 Relocation Assistance to Parcel C. Unless the preceding paragraph applies, the District shall cooperate with the City to relocate the Head Start Program from the Existing HS Site to a Relocated Facility on Parcel C as described in this Exhibit D (subject to the applicable terms and conditions noted below) in a Warm Shell Condition.

2.2.3 No Further Relocation Obligations. Aside from the obligations set forth in Paragraphs 2.2.1 and 2.2.2, the District shall have no other obligations to relocate the Head Start Program or participate in any costs arising from such relocation efforts. Consistent with Section 6.17 of the Agreement, the Head Start Program is not a third party beneficiary of these Exhibit D Provisions, and the obligations in this Exhibit D are intended to identify the District's obligations to the City.

2.2.4 Temporary Site During Relocation. Due to needs related to Project construction (including without limitation phasing, infrastructure, utility, and/or mobilization), the existing Head Start Program may be required to temporarily relocate to another site within the Project Site or offsite before being permanently relocated to the Relocated Facility (the "Temporary Relocated Facility"). The District shall cooperate with the Head Start Program in its effort to establish a Temporary Relocated Facility. The District shall have no obligation to assist the Head Start Program to find an off-site temporary location, or pay for it, and the temporary relocation of the Head Start Program off-site during construction of the Project shall not be a default of the District's obligations under this Agreement.

2.2.5 District's Discretion. Notwithstanding anything else in this Agreement: (1) the District shall have sole discretion to determine where within the Project Site the Relocated Facility or Temporary Relocated Facility will be located based on the District's Project needs ; (2) it shall not be a default of the District's obligations insofar as the District makes decisions about the Relocated Facility or Temporary Relocated Facility based on District Needs, or if a lessee, licensee, sublessee, or development partner of the District determines, after a good faith effort to accommodate the Relocated Facility, that it cannot accommodate the Relocated Facility on property in which it has an interest; (3) and failure of the Head Start Program to relocate to the Relocated Facility or Temporary Relocated Facility, provide funding for the relocation or operation of the Head Start Program, or to operate at a comparable scale to the Head Start Program's current operations, shall not constitute a default of the District's obligations under this Exhibit or the Agreement.

2.3 Funding Responsibilities.

2.3.1 Relocation Costs. The parties agree that the District shall have no obligations to fund the Relocated Facility, the Temporary Relocated Facility, any other costs pertaining to any relocation of the Head Start Program, or the operation of the Head Start Program.

2.3.2 Capital Costs. Capital costs, including the cost to construct the core and shell, provide tenant improvements in the Warm Shell, and maintain the Relocated Facility, will be funded by the Head Start Program and not by the District or the City. The City shall work cooperatively with the Parcel C Affordable Housing Developer and Head Start Program to support efforts in applying for and receiving funding to pay for costs related to any Relocated Facility on Parcel C.

2.4 Timely Start of Operations. Subject to the provisions of Section 2.6, below, the District, or its designated representative, shall coordinate in a reasonable manner with the Head Start Program (or alternate program operator, if applicable) to facilitate the start of operations of the Head Start Program (or equivalent program) not later than six (6) months after the later of (i) occupancy of Parcel C by residential tenants or (ii) issuance of a certificate of occupancy for the Relocated Facility, wherever the District determines it shall be located. The District retains sole discretion with respect to development schedules and shall not incur any obligations to expedite development on any parcel within the Project Site as a result of the obligations in this Exhibit.

2.5 Lease Term. If the Head Start Program is relocated to Parcel C, the Head Start Program lease term for any Relocated Facility will be agreed to by the Head Start Program (or its alternate provider) and the Parcel C Affordable Housing Developer, and the City and District shall cooperate in good faith with these third parties to facilitate a lease term that lasts at least through the term of this Agreement. If the District determines the Head Start Program should be relocated to a parcel within the Project Site other than Parcel C, the Head Start Program lease term for any Relocated Facility will be agreed to by the Head Start Program (or its alternate provider) and the lessee, licensee, sublessee, or development partner with an interest in such other parcel, and the City and District shall cooperate with these third parties to facilitate a lease term that lasts at least through the term of this Agreement. Notwithstanding the above, as the fee interest owner of the Project Site, the District shall not be obligated to consent to any term it finds unreasonable, as determined in its sole discretion.

2.6 Replacement Operator. If the Head Start Program is unable to raise sufficient capital to fund the construction of the Relocated Facility, its program relocation, or operation of the Head Start Program (as referenced in Paragraph 2.3, above), then (i) the relocation of the Head Start Program will be (A) suspended until such funding is available and sufficient to complete the required construction and delivery of the new Relocated Facility; and (B) if such funding is not in place by one (1) year after occupancy of the residential units in Parcel C, or the occupancy of residential units in any other parcel where the Relocated Facility is located, then the District can select an alternate Head Start Program or similar operator (that qualifies as a 501(c) (3) non-profit or equivalent) to fund the Relocated Facility improvements and operate a "Head Start" or equivalent early childhood education facility and program on Parcel C, or wherever the Relocated Facility is located. If no such operator can be identified that is able to perform within eighteen (18) months after occupancy of the residential units in Parcel C, or the occupancy of residential units in any other parcel where the Relocated Facility is located, the parties agree that the space reserved for the Relocated Facility can be reused for another purpose consistent with

the Project Approvals and the District has no further obligation related to Head Start or any childhood education facility for the entire Precise Plan Area. Notwithstanding the above, as the fee interest owner of Parcel C, the District shall not be obligated to consent to any Head Start Program successor it finds unreasonable, determined in its sole discretion.

2.7 Project Development not Dependent on Relocation. Any Subsequent City Approval, including any Certificate of Occupancy for any work or development associated with the Project, shall not be dependent upon successful funding, construction, start-up or operation of the relocated Head Start Program.

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EXHIBIT E

[PLACEHOLDER FOR TENTATIVE AFFORDABLE HOUSING PLAN]

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EXHIBIT F

[PLACEHOLDER FOR PRECISE PLAN]

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EXHIBIT G

[PLACEHOLDER FOR MITIGATION MONITORING AND REPORTING PROGRAM]

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EXHIBIT H

[PLACEHOLDER FOR CEQA FINDINGS]

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EXHIBIT I

[PLACEHOLDER FOR ORDINANCES]

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SERRAMONTE DEL REY
PARCEL B MULTIFAMILY HOUSING / MIXED USE

PARKING SUMMARY

MINIMUM PARKING REQUIREMENTS: REFER TO PRECISE PLAN
RETAIL: 4 SPACES PER 1000 SF (RENTABLE)
RESIDENTIAL: 1.5 SPACES / D.U.

	Residential						Public - Retail & Leasing				
	Standard	Accessible	Van Accessible	VAN EVCS Accessible	EVCS Accessible	Puzzle Lift	Retail Standard	Retail Accessible	Retail Van Accessible	VAN EVCS Accessible	Leasing
Ground Floor	7	5	1	1	1	286	27	1	1	1	3
Totals	301						33				
	(1.5 / DU)						(4 SPACES PER 1000 SF RENTABLE)				

GROSS CONSTRUCTION BUILDING AREA SUMMARY

(NOTE: GROSS AREA IS NOT EQUAL TO BUILDING AREA FOR CITY PLANNING PURPOSES)

	Name	Area	Level
	AMENITY	6,620 SF	1ST FLOOR
	COMMON - RESIDENTIAL	8,377 SF	1ST FLOOR
	PARKING	48,456 SF	1ST FLOOR
	RETAIL	6,656 SF	1ST FLOOR
TOTAL	1ST FLOOR	70,109 SF	
	APARTMENTS	38,287 SF	2ND FLOOR / PODIUM
	COMMON - RESIDENTIAL	7,639 SF	2ND FLOOR / PODIUM
TOTAL	2ND FLOOR / PODIUM	45,926 SF	
	APARTMENTS	39,542 SF	3RD FLOOR
	COMMON - RESIDENTIAL	6,729 SF	3RD FLOOR
TOTAL	3RD FLOOR	46,272 SF	
	APARTMENTS	39,462 SF	4TH FLOOR
	COMMON - RESIDENTIAL	6,751 SF	4TH FLOOR
TOTAL	4TH FLOOR	46,213 SF	
	APARTMENTS	38,239 SF	5TH FLOOR
	COMMON - RESIDENTIAL	6,512 SF	5TH FLOOR
TOTAL	5TH FLOOR	44,751 SF	
	AMENITY	1,216 SF	6TH FLOOR
	APARTMENTS	33,165 SF	6TH FLOOR
	COMMON - RESIDENTIAL	6,435 SF	6TH FLOOR
	6TH FLOOR	40,817 SF	
TOTAL	TOTAL GROSS AREA	294,087 SF	
	TOTAL TYPE I AREA	**70,109 SF**	
	TOTAL TYPE III-A AREA	**223,978 SF**	

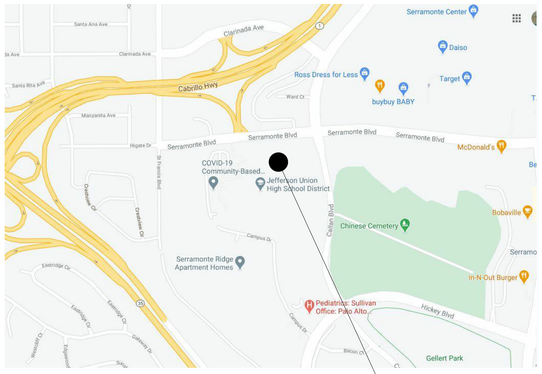
PRIVATE BALCONY SUMMARY

(SEE LANDSCAPE DRAWINGS FOR FULL OPEN SPACE SUMMARY)

Name	Area	Level
BALCONY	155.6 SF	2ND FLOOR / PODIUM
BALCONY	348.4 SF	2ND FLOOR / PODIUM
2ND FLOOR / PODIUM	504.0 SF	
BALCONY	155.6 SF	3RD FLOOR
BALCONY	348.4 SF	3RD FLOOR
3RD FLOOR	504.0 SF	
BALCONY	129.5 SF	5TH FLOOR
BALCONY	129.7 SF	5TH FLOOR
BALCONY	129.8 SF	5TH FLOOR
BALCONY	129.8 SF	5TH FLOOR
BALCONY	129.8 SF	5TH FLOOR
BALCONY	130.1 SF	5TH FLOOR
5TH FLOOR	778.8 SF	
Grand total	1,786.8 SF	

UNIT TABULATION

Unit Type	ST/JR-1	ST/JR-2	ST/JR-3	1A	1B	1C-1	1C-2	1D	2A-1	2A-2	2B	2C	2D	2E-1	2E-2	2F	3A	3B	Totals
Average Area																			
2nd floor	2	2		11		2	1		14		1			4			2	1	40
3rd floor	2	2		12		2	1		13		1			4			3	1	41
4th floor	2	2		12		2	1		13		1			4			3	1	41
5th floor	2	2		10	2	2	1		9		1	4		2	2		3	1	41
6th floor	2	2	1	9	1	2	1	3	3	4	1		3		2	1	3		38
Totals	10	10	1	54	3	10	5	3	52	4	5	4	3	14	4	1	14	4	201



VICINITY MAP

DRAWING INDEX

GENERAL

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A3.1 SOUTH & WEST ELEVATION
A4.0 BUILDING SECTIONS
A5.0 UNIT PLANS

PROJECT INFORMATION

APN:	091-211-230
ZONING:	PLANNED DEVELOPMENT COMMERCIAL MIXED-USE DISTRICT (C-MU)
SETBACKS:	REFER TO PRECISE PLAN
TYPE OF CONSTRUCTION:	TYPE I (GARAGE / GROUND FLOOR) TYPE III-A (SUPERSTRUCTURE)
SITE AREA:	185,724 SF (4.26 ACRES)
SITE COVERAGE:	70,109 / 185,724 = 38%
REQUIRED OPEN SPACE:	201 D.U. x 150 SF/DU = 30,150 SF
USEABLE OPEN SPACE PROVIDED:	75,431 SF, S.L.D.
MAXIMUM BUILDING HEIGHT: PROPOSED BUILDING HEIGHT:	87'-0" (PER PRECISE PLAN UPDATE) 86'-6"
RETAIL AREA (RENTABLE)	NORTH RETAIL: 3027 SF SOUTH RETAIL: 2773 SF TOTAL: 5800 SF
BICYCLE PARKING PROVIDED:	1 PER D.U. (IN ENCLOSED ROOMS ON GROUND FLOOR, TOTAL 2745 SF)

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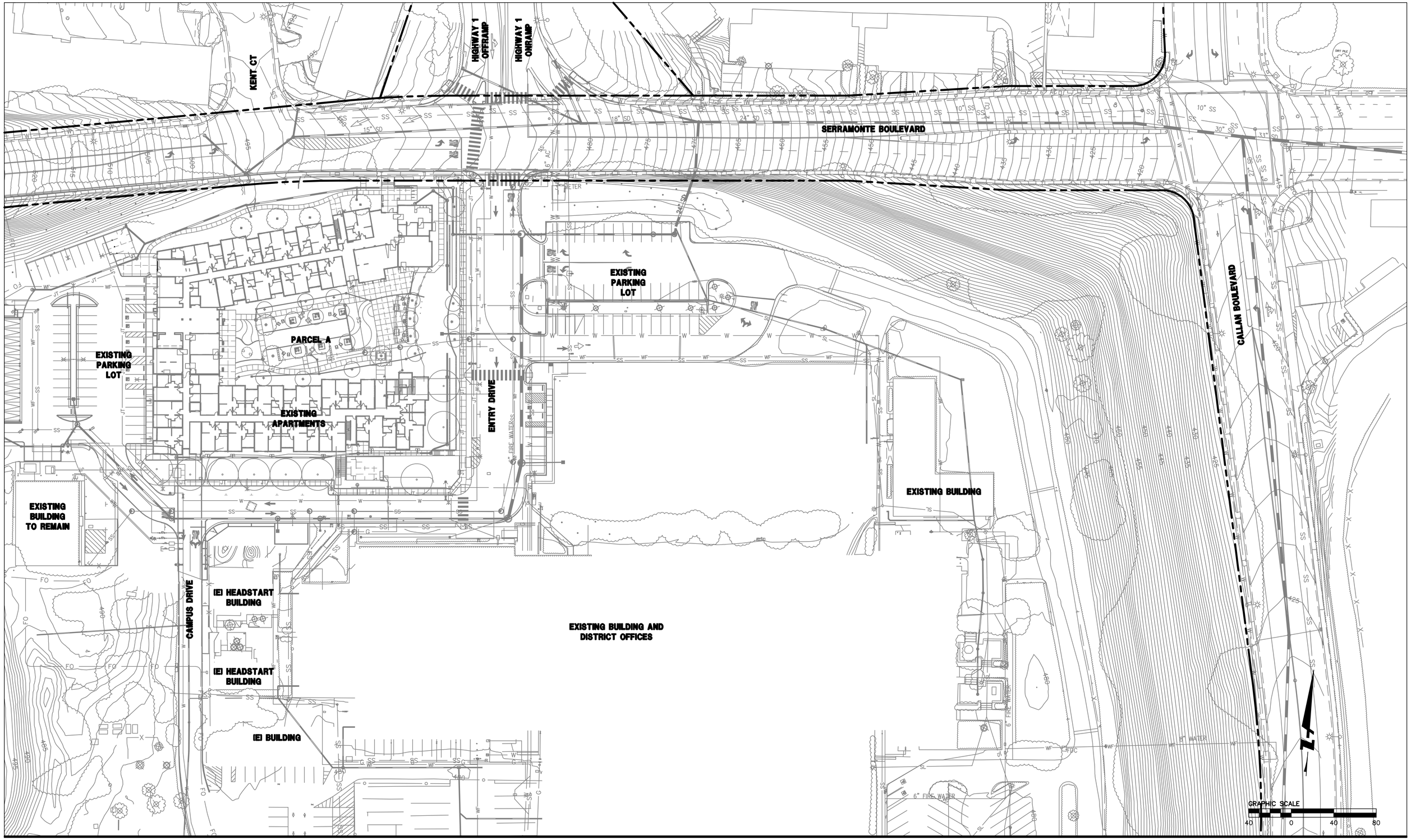
DALY CITY, CA

Brookwood Advisors

A0.1
PROJECT INFORMATION
8/25/2023
12" = 1'-0"



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C1.1
EXISTING CONDITIONS PLAN
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SHEET NOTES:

1. GRADING EXCEDDING 50 CUBIC YARDS SHALL REQUIRE APPROVAL OF PLANS AND A GRADING PERMIT. A LICENSED CIVIL ENGINEER SHALL PREPARE ANY GRADING PLANS AND EROSION CONTROL PLANS IN CONFORMANCE WITH A SOIL REPORT PREPARED BY A LICENSED SOIL ENGINEER OR GEOLOGIST IN COMPLIANCE WITH NPDES REQUIREMENTS PRIOR TO ANY DEVELOPMENT ON THE PROPERTY.
2. AN ENCROACHMENT PERMIT SHALL BE REQUIRED TO BE ISSUED BY THE PUBLIC WORKS DEPARTMENT FOR ALL WORK PROPOSED WITHIN THE PUBLIC RIGHT-OF-WAY.
3. FOLLOWING NEW UTILITY INSTALLATION, THE APPLICANT SHALL REPLACE AREAS OF STREET PAVEMENT, SIDEWALK, CURB, AND GUTTER DAMAGED BY CONSTRUCTION. SUCH REPAIR SHALL BE PER CITY STANDARD SPECIFICATIONS.
4. ALL PROJECT IMPROVEMENTS SHALL BE ADA COMPLIANT.
5. THE APPLICANT SHALL COMPLY WITH THE APPLICABLE REQUIREMENTS OF THE CITY OF DALY CITY STANDARD DETAILS AND SPECIFICATIONS.
6. THE PROJECT'S ELECTRICAL TRANSFORMER SHALL NOT BE INSTALLED WITHIN THE PUBLIC RIGHT-OF-WAY.
7. ALL ELECTRICAL AND TELECOMMUNICATIONS SERVICES SHALL BE PROVIDED THROUGH UNDERGROUND CONNECTIONS. THERE SHALL BE NO OVERHEAD DROPS.
8. FULL TRASH CAPTURE DEVICE SHALL BE INSTALLED AND APPROVED BY CITY ENGINEER FOR ALL DRAINAGE SYSTEMS.

KENT CT
HIGHWAY 1 OFF-RAMP
HIGHWAY 1 ON-RAMP
15" SD
24" SD
PARALLEL PARKING
SERRAMONTE BOULEVARD
TRAVEL LANE
TRAVEL LANE
TURN LANE
TRAVEL LANE
BIKE LANE
BUS STOP
CONFORM TO EXISTING ENTRY DRIVE AND SERRAMONTE BLVD.
SIDEWALK
PARALLEL PARKING
CONCRETE MEDIAN, TYP
EXISTING BUILDING UNDER CONSTRUCTION
ENTRY DRIVE (PRIVATE ROAD)
STOP SIGN
PARCEL B BUILDING
OPEN SPACE
STANDARD PARKING STALLS
SIDEWALK
PARALLEL PARKING
NORTH DRIVE (PRIVATE ROAD)
SIDEWALK
PRIVATE DRIVEWAY
EXISTING BUILDING TO REMAIN
(F) PROPERTY LINE, TYP
EXISTING BUILDING (DISTRICT OFFICE)
CALLAN BOULEVARD
GRAPHIC SCALE
40 0 40 80

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C2.1
CONCEPTUAL SITE PLAN
8/25/2023

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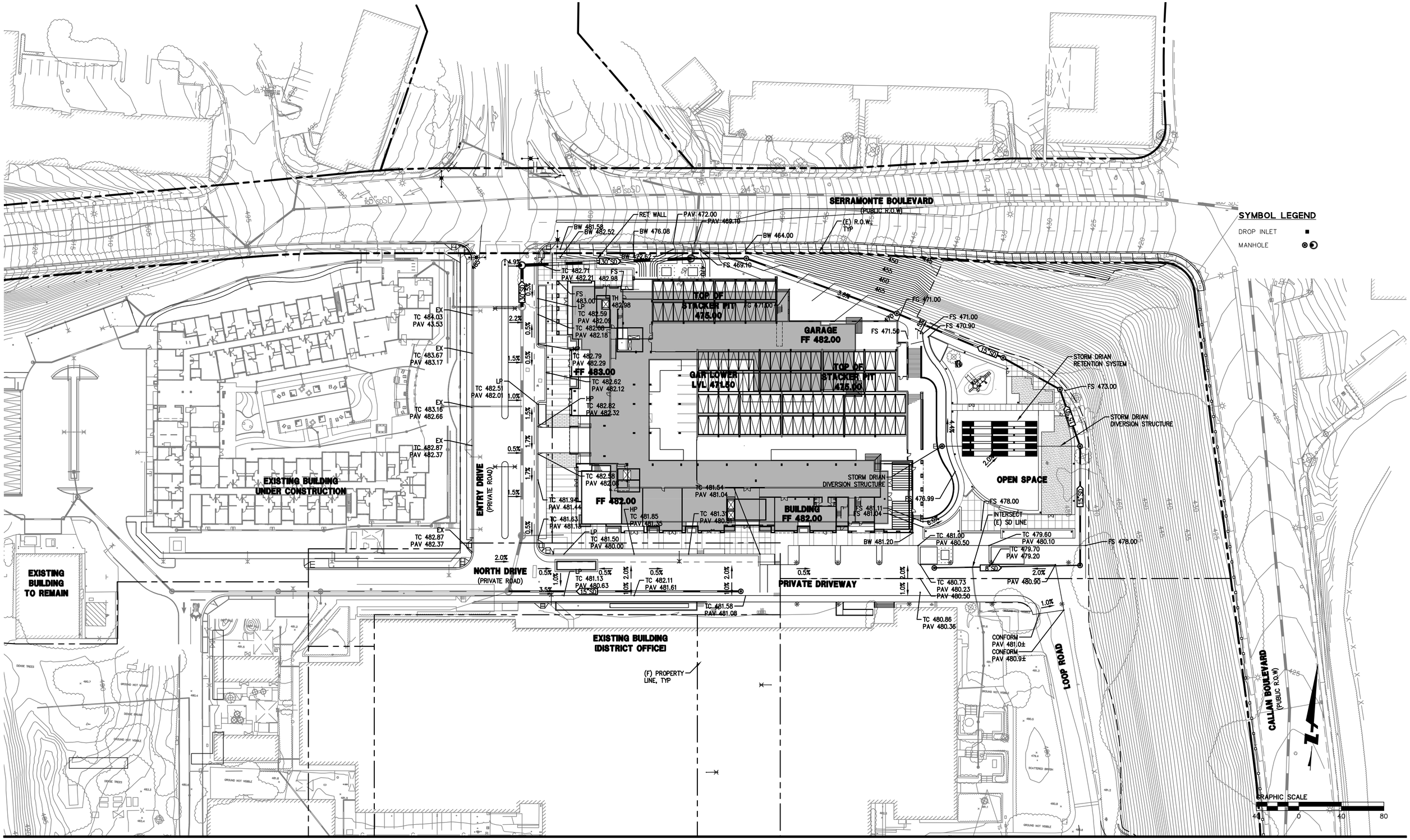

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C3.1
CONCEPTUAL GRADING PLAN
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DMA	PERVIOUS				IMPERVIOUS					TREATMENT			TOTAL
	LANDSCAPE	SELF RETAINING	BIORETENTION	TOTAL PERVIOUS	PLAY AREA	ROOF/PODIUM	PARKING	ROAD. PATH, S/W	TOTAL IMPERVIOUS	TYPE	REQ	PROVIDED	
01	895		414	**1,309**				9,530	**9,530**	BR	386	414	**10,839**
02			2,695	**2,695**		63,890			**63,890**	BR	2,566	2,695	**66,585**
03	2,110		428	**2,538**	2,440			4,212	**6,652**	BR	276	428	**9,190**
04	1,620	12,830		**14,450**				5,100	**5,100**	SR	2,550	12,830	**19,550**
05	1,750		880	**2,630**				21,700	**21,700**	BR	879	880	**24,330**
06	310		254	**564**				2,955	**2,955**	BR	120	254	**3,519**
07	685		120	**805**				1,920	**1,920**	BR	80	120	**2,725**
08	780		500	**1,280**				12,130	**12,130**	BR	490	500	**13,410**
09			360	**360**				8,970	**8,970**	BR	360	360	**9,330**
TOTAL	**8,150**	**12,830**	**5,651**	**26,631**	**2,440**	**63,890**	**0**	**66,517**	**132,847**		**7,709**	**18,481**	**159,478**

LEGEND

- PROJECT BOUNDARY
- STORM DRAIN LINE
- LANDSCAPING (SELF TREATING)
- STORMWATER TREATMENT AREA (BIORETENTION)
- PLAY AREA
- IMPERVIOUS PAVING (ROAD, PARKING PATH, S/W)
- BUILDING PODIUM
- ROOF
- 1 BIORETENTION AREA ON GRADE (6" PONDING)
- 2 BIORETENTION AREA STRUCTURE (6" PONDING)
- 3 SELF RETAINING AREA (2" PONDING)
- 4 SELF TREATING AREA

ABBREVIATIONS

DMA DRAINAGE MANAGEMENT AREA
TA TREATMENT AREA

TA	UNDERDRAINED	LINED
01	X	
02	X	X
03	X	X
05	X	
06	X	
07	X	
08	X	
09	X	

KENT CT
HIGHWAY 1 OFF-RAMP
HIGHWAY 1 ON-RAMP
SERRAMONTE BOULEVARD
(E) R.O.W.
TA 01
TA 02
TA 03
TA 05
TA 06
TA 07
TA 08
TA 09
DMA 1
DMA 2
DMA 3
DMA 4
OPEN SPACE
DMA 5
DMA 6
DMA 7
DMA 8
DMA 9
PARCEL A
PARCEL B
PODIUM LEVEL
BUILDING
ENTRY DRIVE
NORTH DRIVE
PRIVATE DRIVEWAY
EXISTING APARTMENTS
EXIST BLDG TO REMAIN
EXISTING BUILDING (DISTRICT OFFICE)
STORMWATER RETENTION STRUCTURE
(F) PROPERTY LINE
(P) PROPERTY LINE
EAST HILLSIDE
CALLAN BOULEVARD
GRAPHIC SCALE 40 0 40 80

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C4.1
STORMWATER MANAGEMENT PLAN
8/25/2023

NOTES:

1. THIS CONCEPTUAL SITE PLAN IS INTENDED TO SHOW GENERAL SITE AND UTILITY LAYOUT.
2. REFER TO ARCHITECTURAL PLANS FOR ELEVATIONS
3. REFER TO LANDSCAPE PLANS FOR MATERIALS
4. SEWER AND WATER MAINS BUILT IN PRIVATE STREETS SHALL BE OWNED BY THE CITY
5. SEWERS OWNED OR CONNECTED TO CITY OWNED INFRASTRUCTURE SHALL BE INSTALL PER SECTION 02720 OF THE CITY OF DALY CITY STANDARD SPECIFICATIONS.
6. UTILITY CLEARANCES AND SEPARATION REQUIREMENTS SET FORTH IN SECTION 02710, 3.05 AND 02720, 3.07 OF THE CITY OF DALY CITY STANDARD CONDITIONS AND DRAWINGS SHALL ALWAYS BE FOLLOWED.
7. WATER CONNECTIONS TO BE CONNECTED TO CITY OWNED WATER INFRASTRUCTURE SHALL BE INSTALLED PER SECTION 02710 OF THE CITY OF DALY CITY STANDARD SPECIFICATIONS. CONNECTIONS SHALL BE MADE WITH A 3-VALVE TEE.
8. WATER SERVICES SHALL BE INSTALLED PER DALY CITY STANDARD DETAIL DRAWING W-3
9. FIRE SERVICES SHALL BE INSTALLED PER DALY CITY STANDARD DETAIL DRAWING W-12

SYMBOL LEGEND	
DROP INLET	▦
CLEANOUT	CO●
SANITARY SEWER LINE	—— SS ——
DOMESTIC WATER LINE	—— W ——
STORM DRAIN LINE	—— SD ——
JOINT TRENCH	—— JT ——
TELEPHONE	—— T ——
FIBER OPTIC	—— FO ——
GAS	—— G ——
STREET LIGHT	—— SL ——

ABBREVIATIONS	
AD	AREA DRAIN
DN	DOWN
DS	DOWNSPOUT
DW	DOMESTIC WATER
(E)	EXISTING
FS	FINISH SURFACE
FW	FIRE WATER
(P)	PROPOSED
PA	PLANTED AREA
SD	STORM DRAIN
SS	SANITARY SEWER
W	WATER

KENT CT
HIGHWAY 1 OFFRAMP
HIGHWAY 1 ONRAMP
SERRAMONTE BOULEVARD
(E) 10" W (PUBLIC)
(E) 6" W (PUBLIC)
(P) FH
SSMH CONNECT TO (E) SEWER RIM 461.91 INV 452.51
(E) 10" PUBLIC SS
99 LF, 10" PVC, S=0.02
(E) R.O.W
SEWER LATERAL
PARCEL A
PARCEL B
(P) IRRIGATION SERVICE
(P) DOMESTIC WATER SERVICE
(P) FIRE WATER SERVICE
OPEN SPACE
BUILDING
EXISTING BUILDING UNDER CONSTRUCTION
ENTRY DRIVE
NORTH DRIVE
PRIVATE DRIVEWAY
EXISTING BUILDING TO REMAIN
EXISTIGN BUILDING (DISTRICT OFFICE)
CONNECT TO EXIST 10" W
CONNECT TO EXIST SEWER
CONNECT TO (E) WATER AND SEWER SERVICES
(E) FH AND FIRE SERVICE TO REMAIN
(F) PROPERTY LINE
CALLAN BOULEVARD
GRAPHIC SCALE
50 0 50 100

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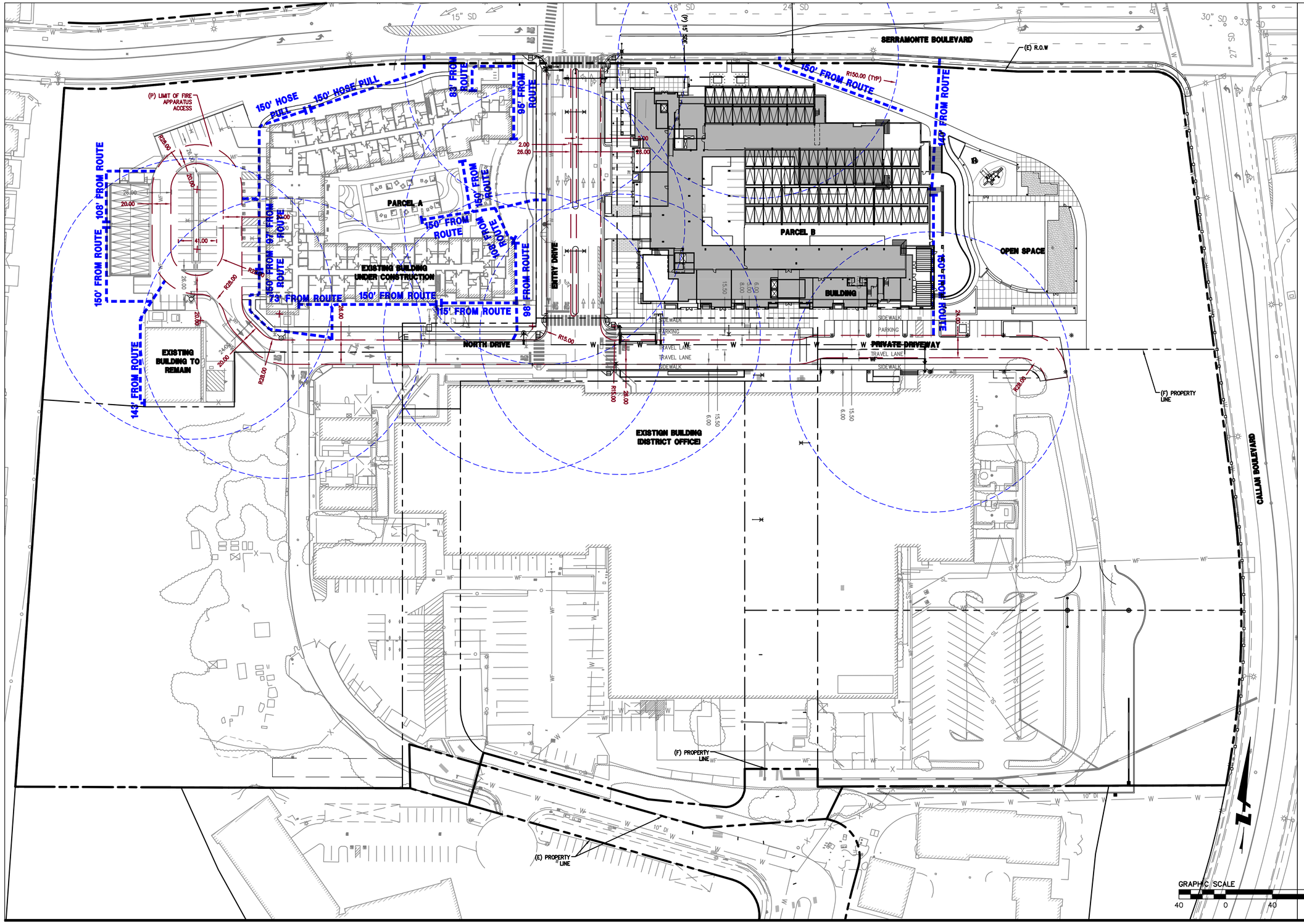
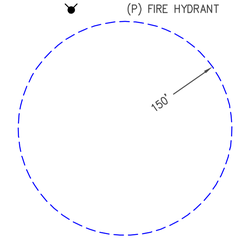
C5.1
CONCEPTUAL UTILITY PLAN
8/25/2023



LEGEND

- HYDRANT RUN BEYOND 150'
- END OF HOSE
- HOSE PULL FROM ACCESS ROUTE
- FIRE APARATUS ACCESS ROUTE
- (E) FIRE HYDRANT
- (P) FIRE HYDRANT



FIRE HYDRANT COVERAGE

- ROAD DIMENSIONS
- FIRE ACCESS ROAD DIMENSIONS

FIRE NOTES:

1. FIRE ACCESS ROADS FOR PROPOSED BUILDINGS ARE BASED ON THE 2019 CALIFORNIA FIRE CODE CHAPTER 5 APPENDIX D.
2. HOSE LENGTHS ARE APPROXIMATE AND SHOWN FOR GENERAL LAYOUT/COVERAGE.
3. PER CFC SECTION 503.1.1 THE FIRE APPARATUS ACCESS ROAD SHALL EXTEND TO WITHIN 150 FEET OF ALL PORTIONS OF THE FACILITY AND ALL PORTIONS OF THE EXTERIOR WALLS OF THE FIRST STORY OF THE BUILDING AS MEASURED BY AN APPROVED ROUTE AROUND THE EXTERIOR OF THE BUILDING OR FACILITY.
   - 3.1. EXCEPTIONS – THE FIRE CODE OFFICIAL IS AUTHORIZED TO INCREASE THE DIMENSION OF 150 FEET WHERE ANY OF THE FOLLOWING CONDITIONS OCCUR:
     - 3.1.1. THE BUILDING IS EQUIPPED THROUGHOUT WITH AN APPROVED AUTOMATIC SPRINKLER SYSTEM INSTALLED IN ACCORDANCE WITH SECTION 903.3.1.1, 903.3.1.2, OR 903.3.1.3.
     - 3.1.2. FIRE APPARATUS ACCESS ROADS CANNOT BE INSTALLED BECAUSE OF LOCATION ON PROPERTY, TOPOGRAPHY, WATERWAYS, NONNEGOTIABLE GRADES OR OTHER SIMILAR CONDITIONS, AND AN APPROVED ALTERNATIVE MEANS OF FIRE PROTECTION IS PROVIDED.
4. PER CFC SECTION 503.2.1 FIRE APPARATUS ACCESS ROADS SHALL HAVE AN UNOBSTRUCTED WIDTH OF NOT LESS THAN 20 FEET, EXCLUSIVE SHOULDERS, EXCEPT FOR APPROVED SECURITY GATES IN ACCORDANCE WITH SECTION 503.6 AND AN UNOBSTRUCTED VERTICAL CLEARANCE OF NOT LESS THAN 13 FEET 6 INCHES.
5. PER CFC SECTION 503.2.5 DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET IN LENGTH SHALL BE PROVIDED WITH AN APPROVED TURNAROUND FIRE APPARATUS. REFER TO PLAN FOR LIMITS OF DESIGNATED FIRE APPARATUS ACCESS ROADS.
6. PER CFC SECTION 507.2.1 PRIVATE FIRE SERVICE MAINS AND APPURTENANCES SHALL BE INSTALLED IN ACCORDANCE WITH NFPA 24 AS AMENDED IN CHAPTER 80.
7. A FIRE HYDRANT SHALL BE WITHIN 40 FEET OF THE FIRE DEPARTMENT CONNECTION.
8. PER APPENDIX C102.1 THE NUMBER OF FIRE HYDRANTS AVAILABLE TO A BUILDING SHALL BE NOT LESS THAN THE MINIMUM SPECIFIED IN TABLE C102.1
9. PER APPENDIX C103.1 FIRE APPARATUS ACCESS ROADS AND PUBLIC STREETS PROVIDING REQUIRED ACCESS TO BUILDINGS IN ACCORDANCE WITH SECTION 503 SHALL BE PROVIDED WITH ONE OR MORE FIRE HYDRANTS, AS DETERMINED BY SECTION C102.1.
10. PER APPENDIX C103.2 THE AVERAGE SPACING BETWEEN FIRE HYDRANTS SHALL BE IN ACCORDANCE WITH TABLE C102.1.
11. PER APPENDIX C103.3 THE MAXIMUM SPACING BETWEEN FIRE HYDRANTS SHALL BE IN ACCORDANCE WITH TABLE C102.1.
12. PER APPENDIX D103.1 WHERE A FIRE HYDRANT IS LOCATED ON A FIRE APPARATUS ACCESS ROAD, THE MINIMUM ROAD WIDTH SHALL BE 26 FEET, EXCLUSIVE OF SHOULDERS.
13. PER APPENDIX D103.4 DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET SHALL BE PROVIDED WITH WIDTH AND TURNAROUND PROVISIONS IN ACCORDANCE WITH TABLE D103.4.
14. PER APPENDIX D103.6 FIRE APPARATUS ACCESS ROADS SHALL BE MARKED WITH PERMANENT NO PARKING–FIRE LANE SIGNS.
15. PER APPENDIX D105.1 WHERE THE VERTICAL DISTANCE BETWEEN THE GRADE PLANE AND THE HIGHEST ROOF SURFACE EXCEEDS 30 FEET, APPROVED AERIAL FIRE APPARATUS ACCESS ROADS SHALL BE PROVIDED.
    - 15.1. PER APPENDIX D105.2 AERIAL FIRE APPARATUS ACCESS ROADS SHALL HAVE A MINIMUM UNOBSTRUCTED WIDTH OF 26 FEET, EXCLUSIVE OF SHOULDERS, IN THE IMMEDIATE VICINITY OF THE BUILDING OR PORTION THEREOF.
    - 15.2. PER APPENDIX D105.3 ONE OR MORE OF THE REQUIRED ACCESS ROUTES MEETING THIS CONDITION SHALL BE LOCATED NOT LESS THAN 15 FEET AND NOT GREATER THAN 30 FEET FROM THE BUILDING, AND SHALL BE POSITIONED PARALLEL TO ONE ENTIRE SIDE OF THE BUILDING.

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C6.1
CONCEPTUAL FIRE ACCESS PLAN
8/25/2023

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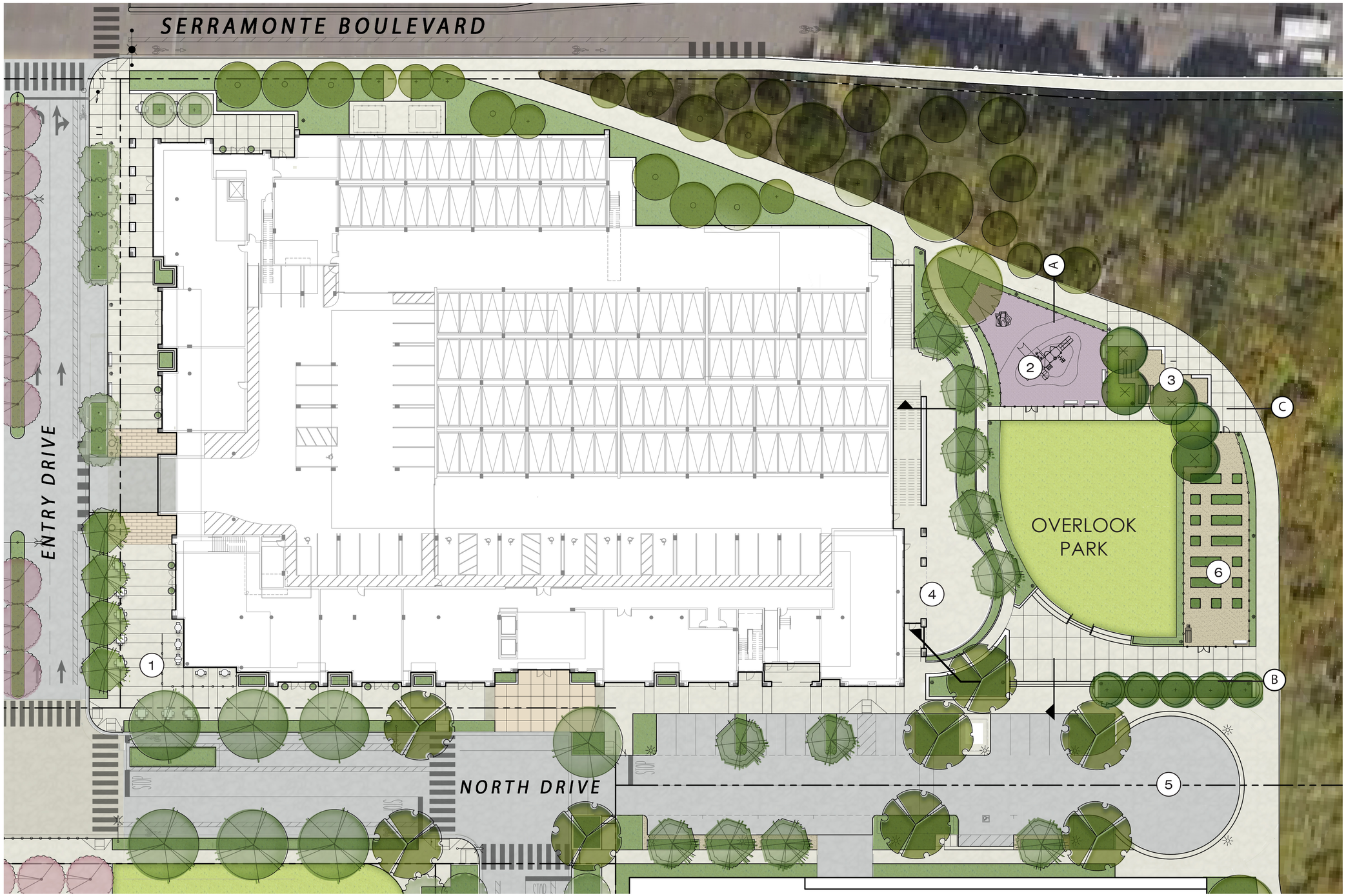

LEGEND

1. ENHANCED PAVING, TYP
2. INCLUSIVE PLAYGROUND WITH STRUCTURES FOR AGES 2-5 & 5-12
3. OVERLOOK
4. RESIDENTIAL TERRACE
5. REFER TO CIVIL PLANS FOR LIMIT OF WORK AND PHASING FOR ROADWAY IMPROVEMENTS
6. COMMUNITY GARDEN

N

0 10' 20' 40' 60'

SCALE: 1" = 20'-0"

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DALY CITY, CA

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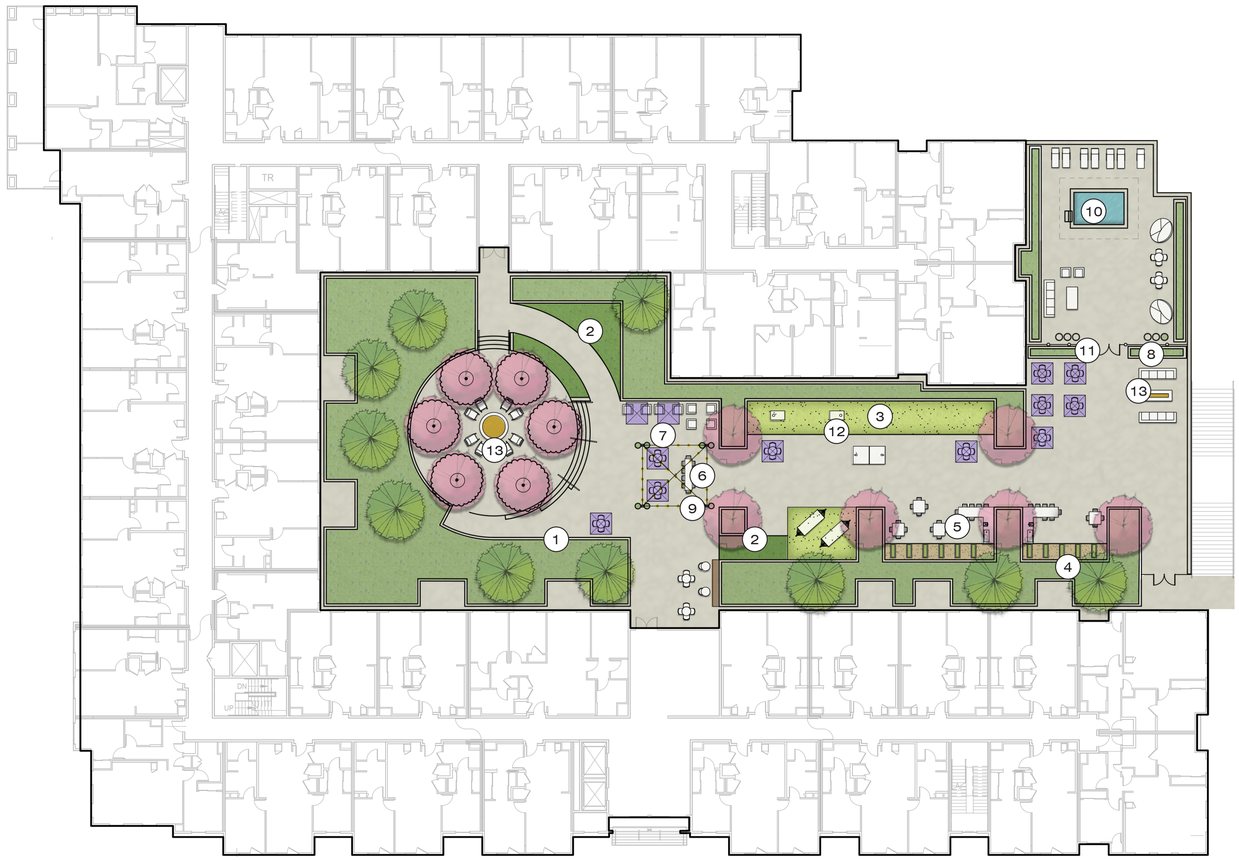
L-1
LANDSCAPE PLAN - GROUND FLOOR
08/25/2023



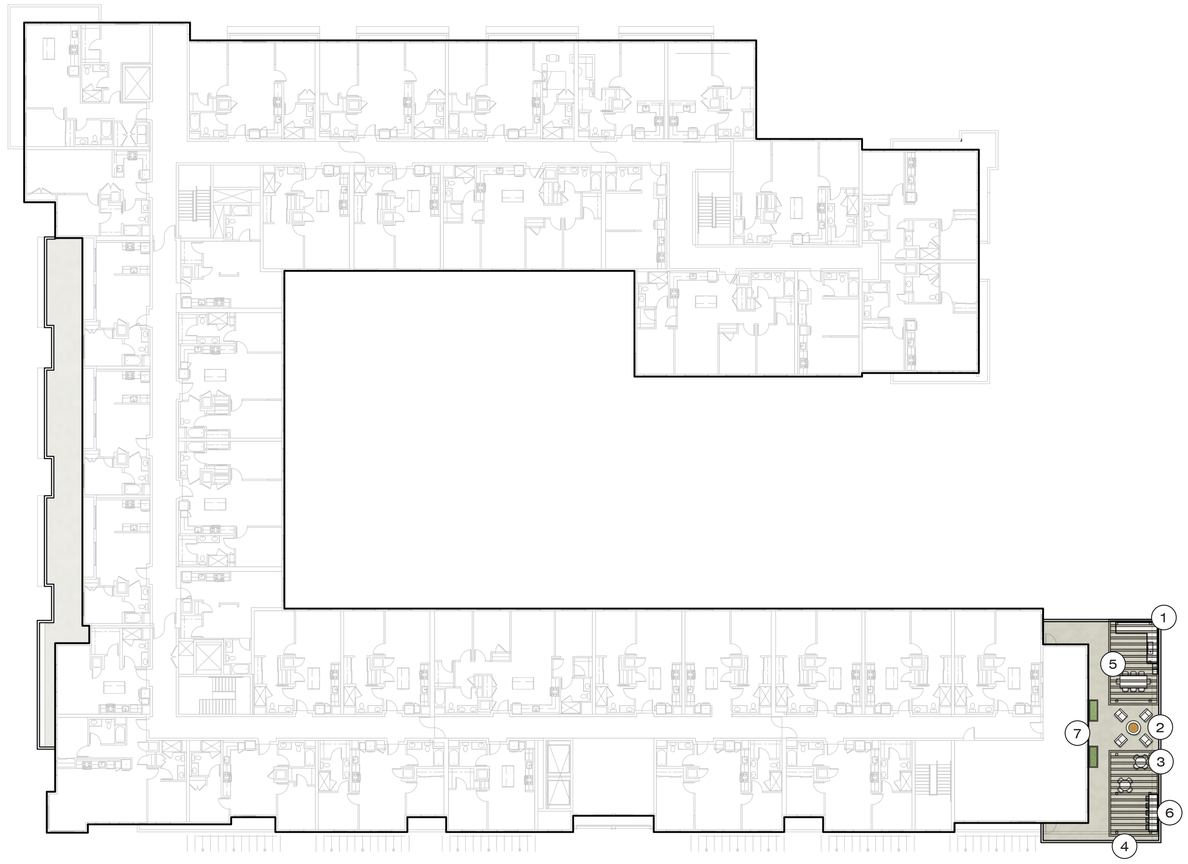
LEGEND

1. RAISED PLANTER, TYP (INCLUDES STORMWATER TREATMENT AREAS)
2. LOW GREENROOF PLANTING, TYP
3. SYNTHETIC TURF, TYP
4. RAISED GARDEN PLANTERS, TYP
5. OUTDOOR KITCHEN & COUNTER SEATING, TYP
6. COMMUNITY TABLE
7. LOUNGE FURNITURE & UMBRELLA, TYP
8. PLANTER, TYP
9. STRING LIGHTING
10. SPA
11. SPA ENCLOSURE
12. OUTDOOR GAMES; CORN-HOLE, PADDLE BALL
13. FIREPIT

N

0 10' 20' 40' 60'

SCALE: 1" = 20'-0"



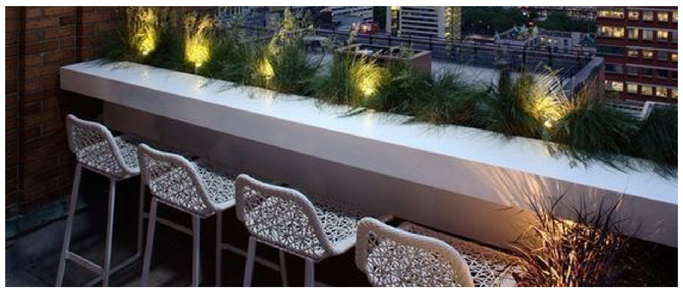
LEGEND

1. OUTDOOR KITCHEN WITH BBQ, TRASH & RECYCLE RECEPTACLE
2. FIRE PIT & LOUNGE SEATING
3. TABLES & CHAIRS, TYP
4. ARBOR, TYP
5. COMMUNITY TABLE
6. OVERLOOK COUNTER
7. PLANTER, TYP

N

0 10' 20' 40' 60'

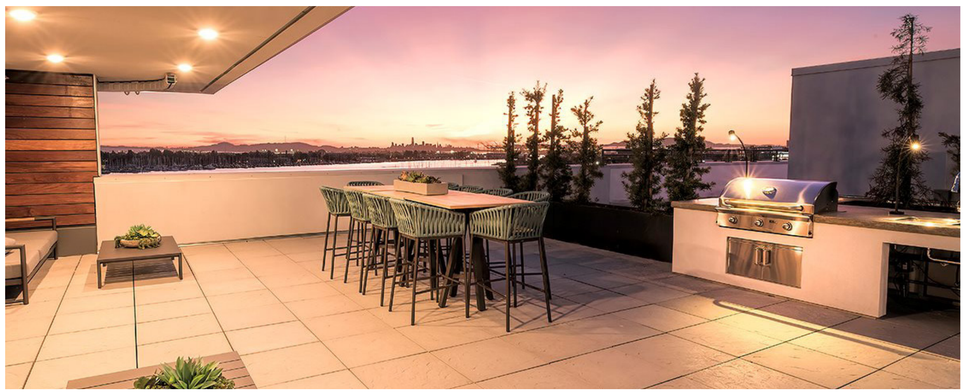
SCALE: 1" = 20'-0"



OVERLOOK COUNTER AT ROOF TERRACE

RAISED PLANTERS

BIKE RACKS



OUTDOOR KITCHEN & COUNTER SEATING AT COURTYARD

COMMUNITY GARDEN

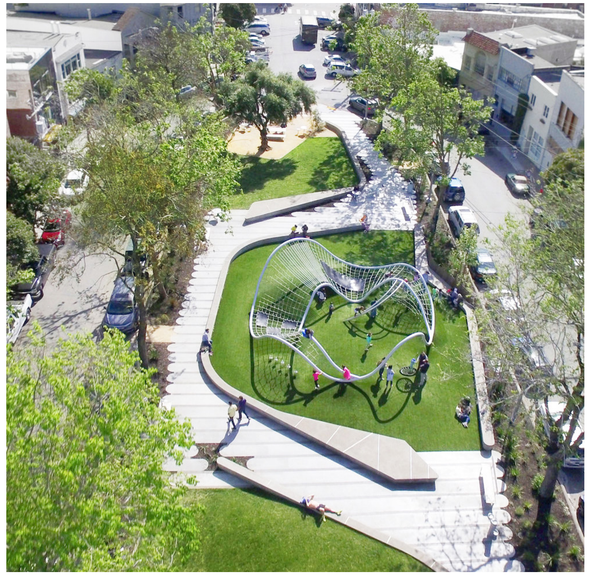
LAWN AREA AT OVERLOOK PARK

STRING LIGHTS AT COURTYARD

OUTDOOR GAMES AT COURTYARD

FIREPIT AT COURTYARD

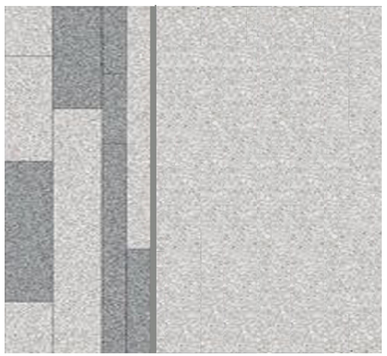
ARBOR AT ROOF TERRACE



INCLUSIVE PLAYGROUND AT OVERLOOK PARK

PAVING

STANDARD CONCRETE



ENHANCED PAVING

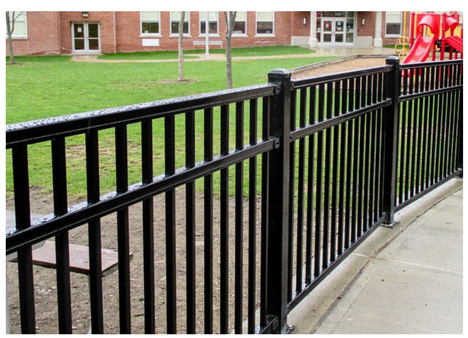
PLAY AREA RESILIENT SURFACING

DECOMPOSED GRANITE PAVING AT COURTYARD RAISED PLANTERS

SYNTHETIC TURF AT COURTYARD

LAWN AT OVERLOOK PARK

WALLS AND FENCING



42” HIGH METAL ENCLOSURE FENCE AROUND PLAY AREA

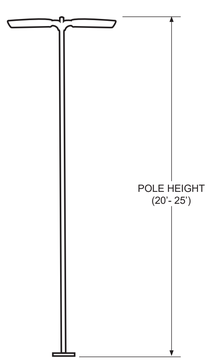
RAISED PLANTERS AT COURTYARD

BOARD FORM CONCRETE WALL AT OVERLOOK PARK

RETAINING WALL AT OVERLOOK PARK

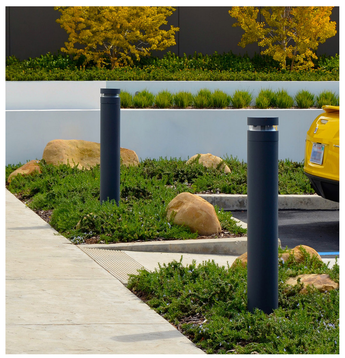
BUILT-IN-BENCH AT RETAIL PLAZA

LIGHTING



LED PARKING & ROAD LIGHT FIXTURE

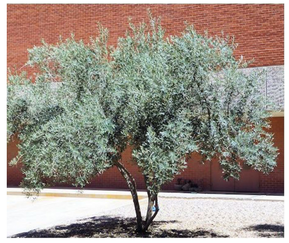
PEDESTRIAN LIGHT FIXTURE



BOLLARD LIGHT AT RETAIL PLAZA

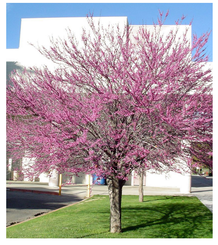
RECESSED WALL LIGHT

STRING LIGHTS AT COURTYARD



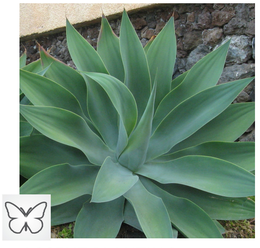
STREET TREES

PARK TREES



ACCENT/SMALL TREES

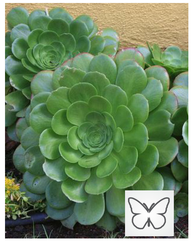
HILLSIDE SUCCESSION AREA



MEDIUM AND SMALL SHRUBS

ACCENT PLANTING

ACCENT PLANTING



GROUNDCOVER

C3 STORMWATER PLANTING

NOTE:
* DENOTES BUTTERFLY OR HUMMINGBIRD GARDEN SPECIES

PRELIMINARY PLANT PALETTE

STREET TREES - COORDINATE WITH CITY ARBORIST

- ACER BUERGERIANUM - TRINDENT MAPLE
- ARBUTUS 'MARINA'- STRAWBERRY TREE
- HYMENOSPORUM FLAVUM - SWEETSHADE
- MELALEUCA QUINQUENERVIA - SEJPUT TREE
- OLEA EUROPAEA 'SWAN HILL' - OLIVE TREE
- TRISTANIOPSIS LAURINA - WATER GUM

PARK TREES

- LAGUNARIA PATERSONIA - NORFOLK ISLAND HIBISCUS
- QUERCUS SUBER - CORK OAK

ACCENT/SMALL TREES

- ACER PALMATUM - JAPANESE MAPLE
- *CERCIS OCCIDENTALIS - WESTERN REDBUD
- PISTACIA CHINENSIS - CHINESE PISTACHE

MEDIUM AND SMALL SHRUBS

- *CALAMAGROSTIS FOLIOSA - MENDOCINO REED GRASS
- *EPILOBIUM CANUM 'CATALINA' - CALIFORNIA FUCHSIA
- HELICTOTRICHON SEMPERVIRENS - BLUE OAT GRASS
- RIBES SANGUINEUM - PINK FLOWERED CURRENT
- *ROSMARINUS OFFICINALIS - ROSEMARY
- PITTOSPORUM CRASSIFOLIUM - KARO
- POLYSTICHUM MUNITUM - WESTERN SWORD FERN

ACCENT PLANTINGS

- AGAVE ATTENUATA - FOX TAIL AGAVE
- ANIGOZANTHOS - KANGAROO PAW
- CLIVIA MINIATA - KAFFIR LILY
- LIBERTIA PEREGRINANS - ORANGE LIBERTIA
- *SALVIA GREGGII - AUTUMN SAGE
- SENECIO VITALIS - NARROW LEAF CHALKSTICKS

GROUNDCOVER

- ALOE DISTANS
- AEONIUM CANARIENSE - HOUSELEEK
- AJUGA REPTENS - BLUE BUGLE
- *CEANOTHUS - CALIFORNIA LILAC
- THYMUS - THYME

C3 STORMWATER PLANTING

- *ACHILLEA MILLEFOLIUM - YARROW
- CHONDROPETALUM TECTORUM - CAPE RUSH
- *ERIOGONUM LATIFOLIUM - COAST BUCKWHEAT
- LOMANDRA LONGIFOLIA - DWARF MAT RUSH
- *PENSTEMON 'MARGARITA BOP' - BEARD TONGUE
- CERCIS CANADENSIS 'FOREST PANSY

HILLSIDE SUCCESSION AREA

- AESCULUS CALIFORNICA - CALIFORNIA BUCKEYE
- ACER MACROPHYLLUM - BIG LEAF MAPLE
- ARBUTUS MENZIESII - PACIFIC MADRONE
- CALOCEDRUS DECURRENS - INCENSE CEDAR
- CENAOTHUS 'RAY HARTMAN' - WILD LILAC
- HESPEROCYPARIS MAROCARPA - MONTEREY CYPRESS
- FREMONTODENDRON CALIFORNICUM - FREMONTIA

GENERAL PLANTING AND IRRIGATION NOTES:

1. LANDSCAPE AND IRRIGATION PLANS SHALL COMPLY WITH THE CRITERIA OF THE CALIFORNIA MODEL WATER EFFICIENCY ORDINANCE AND APPLY THOSE CRITERIA FOR THE EFFICIENT USE OF WATER IN THE LANDSCAPE DESIGN PLAN AND COMPLY WITH APPLICABLE CITY CODES, ORDINANCES AND PRECISE PLAN REQUIREMENTS.

2. LANDSCAPE AND IRRIGATION PLANS SHALL CONFORM WITH TIER 2 LANDSCAPE PROJECT REQUIREMENTS. WATER USE EFFICIENCY CHECKLIST AND WATER USE CALCULATIONS TO BE PROVIDED WITH DETAILED LANDSCAPE AND IRRIGATION DESIGN DRAWINGS FOR BUILDING PERMIT.

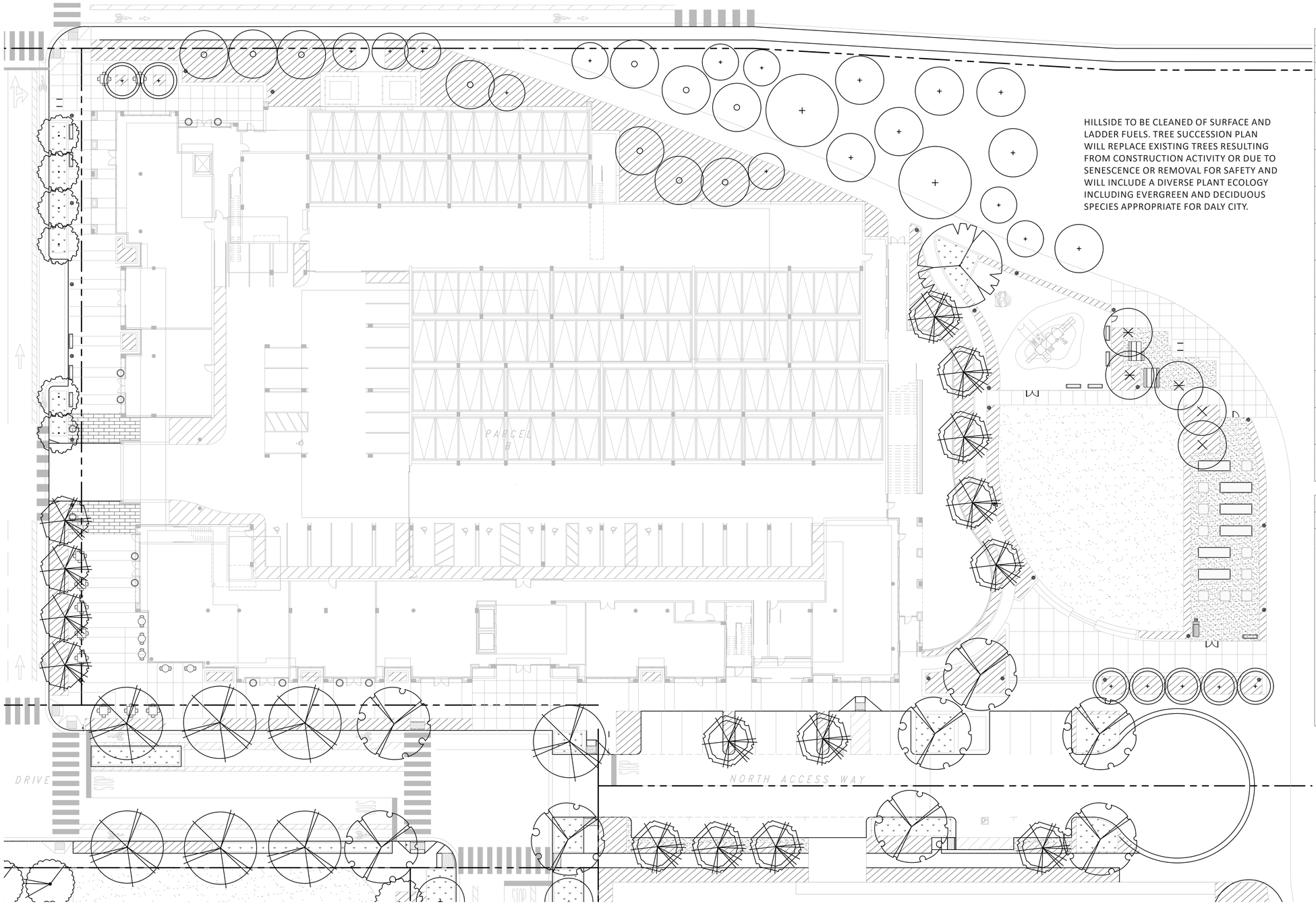
3. ALL PLANTING AREAS SHALL BE TOP-DRESSED WITH A MINIMUM 3" LAYER OF ORGANIC, UN-DYED MULCH RECYCLED FROM LOCAL ORGANIC MATERIALS SUCH AS TREE TRIMMINGS, PLANT, OR CLEAN WOOD WASTE ON EXPOSED SURFACES.

4. IRRIGATION SYSTEM IS TO BE A FULLY AUTOMATIC WEATHER-BASED SYSTEM USING LOW FLOW DRIP AND BUBBLER SYSTEM.

5. STREET TREES SHALL BE TIED INTO IRRIGATION SYSTEM.

6. AT LEAST EIGHTY PERCENT OF THE PLANTS IN LANDSCAPE AREA SHALL BE NATIVE PLANTS OR LOW-WATER USING PLANTS.

7. LANDSCAPING AND IRRIGATION SHALL COMPLY WITH CHAPTER 17.41 WATER CONSERVATION IN LANDSCAPING.



HILLSIDE TO BE CLEANED OF SURFACE AND LADDER FUELS. TREE SUCCESSION PLAN WILL REPLACE EXISTING TREES RESULTING FROM CONSTRUCTION ACTIVITY OR DUE TO SENESCENCE OR REMOVAL FOR SAFETY AND WILL INCLUDE A DIVERSE PLANT ECOLOGY INCLUDING EVERGREEN AND DECIDUOUS SPECIES APPROPRIATE FOR DALY CITY.

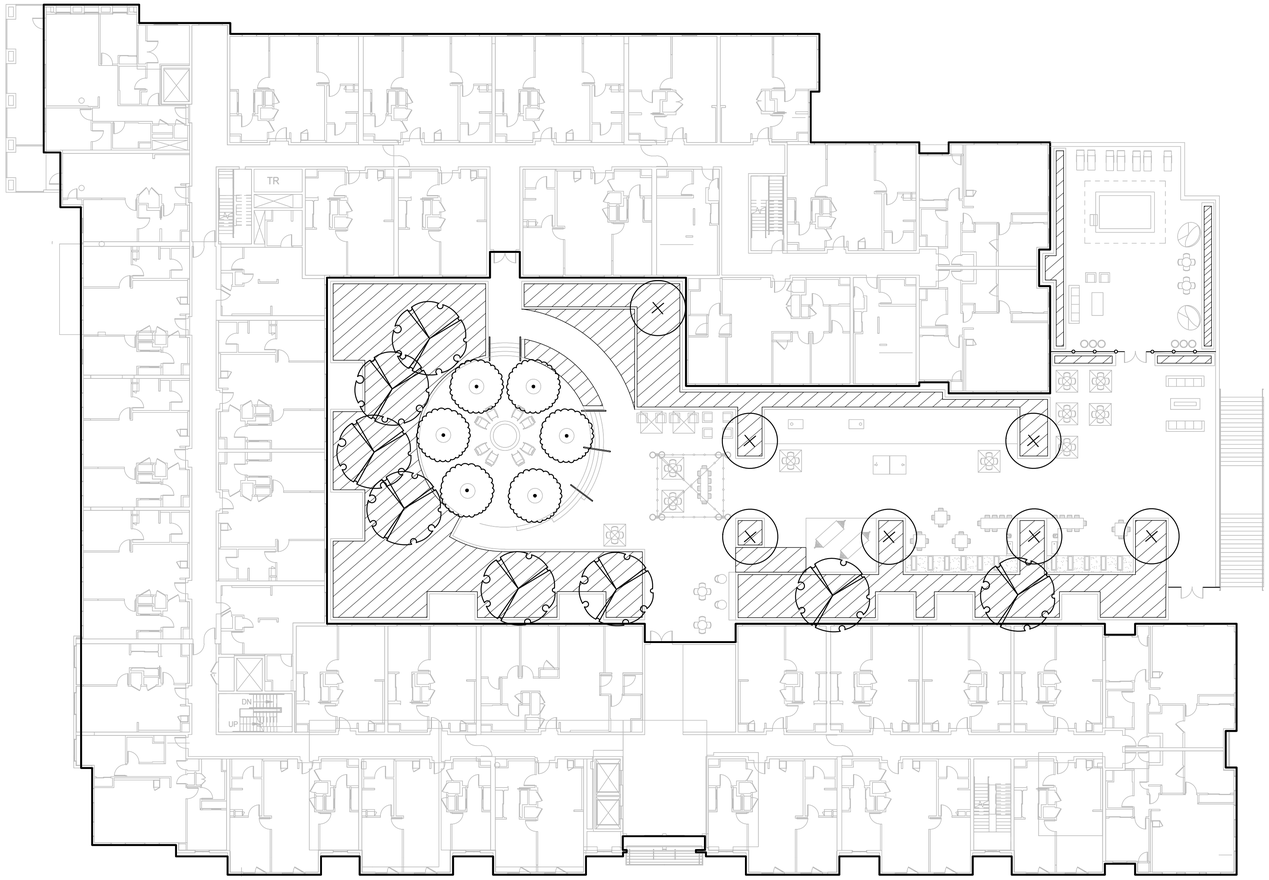
PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE
TREES						
T-1		ACER BUERGERIANUM	TRIDENT MAPLE	24" BOX	PER PLAN	M
T-2		ACER PALMATUM	JAPANESE MAPLE	24" BOX	PER PLAN	M
T-3		ARBUTUS 'MARINA'	MARINA STRAWBERRY TREE	24" BOX	PER PLAN	L
T-4		CERCIS OCCIDENTALIS	WESTERN REDBUD	24" BOX	PER PLAN	M
T-5		HYMENOSPORUM FLAVUM	SWEETSHADE	24" BOX	PER PLAN	L
T-6		LAGUNARIA PATERSONII	NORFOLK ISLAND HIBISCUS	24" BOX	PER PLAN	M
T-7		MELALEUCA QUINQUENERVIA	SEJEPUT TREE	24" BOX	PER PLAN	M
T-8		OLEA EUROPEA 'SWAN HILL'	OLIVE TREE	24" BOX	PER PLAN	L
T-9		PISTACIA CHINENSIS	CHINESE PISTACHE	24" BOX	PER PLAN	L
T-10		QUERCUS SUBER	CORK OAK	24" BOX	PER PLAN	L
T-11		TRISTANIOPSIS LAURINA	WATER GUM	24" BOX	PER PLAN	L

HILLSIDE SUCCESSION AREA

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WTR USE
+	AESCULUS CALIFORNICA	CALIFORNIA BUCKEYE	24" BOX	L
	ACER MACROPHYLLUM	BIG LEAF MAPLE	24" BOX	L
	ARBUTUS MENZIESII	PACIFIC MADRONE	24" BOX	L
	CALOCEDRUS DECURRENS	INCENSE CEDAR	24" BOX	L
	CEANOTHUS 'RAY HARTMAN'	WILD LILAC	24" BOX	L
	HESPEROCYPARIS MACROCARPA	MONTEREY CYPRESS	24" BOX	L
	FREMONTODENDRON CALIFORNICUM	FREMONTIA	24" BOX	L

SEE SHEET L-8 FOR FULL PLANTING PLAN PALETTE



N

0 10' 20' 40' 60'

SCALE: 1" = 20'-0"

PRELIMINARY PLANT PALETTE

KEY	SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE
TREES						
T-1		ACER BUERGERIANUM	TRIDENT MAPLE	24" BOX	PER PLAN	M
T-2		ACER PALMATUM	JAPANESE MAPLE	24" BOX	PER PLAN	M
T-3		ARBUTUS 'MARINA'	MARINA STRAWBERRY TREE	24" BOX	PER PLAN	L
T-4		CERCIS OCCIDENTALIS	WESTERN REDBUD	24" BOX	PER PLAN	M
T-5		HYMENOSPORUM FLAVUM	SWEETSHADE	24" BOX	PER PLAN	L
T-6		LAGUNARIA PATERSONII	NORFOLK ISLAND HIBISCUS	24" BOX	PER PLAN	M
T-7		MELALEUCA QUINQUENERVIA	SEJEPUT TREE	24" BOX	PER PLAN	M
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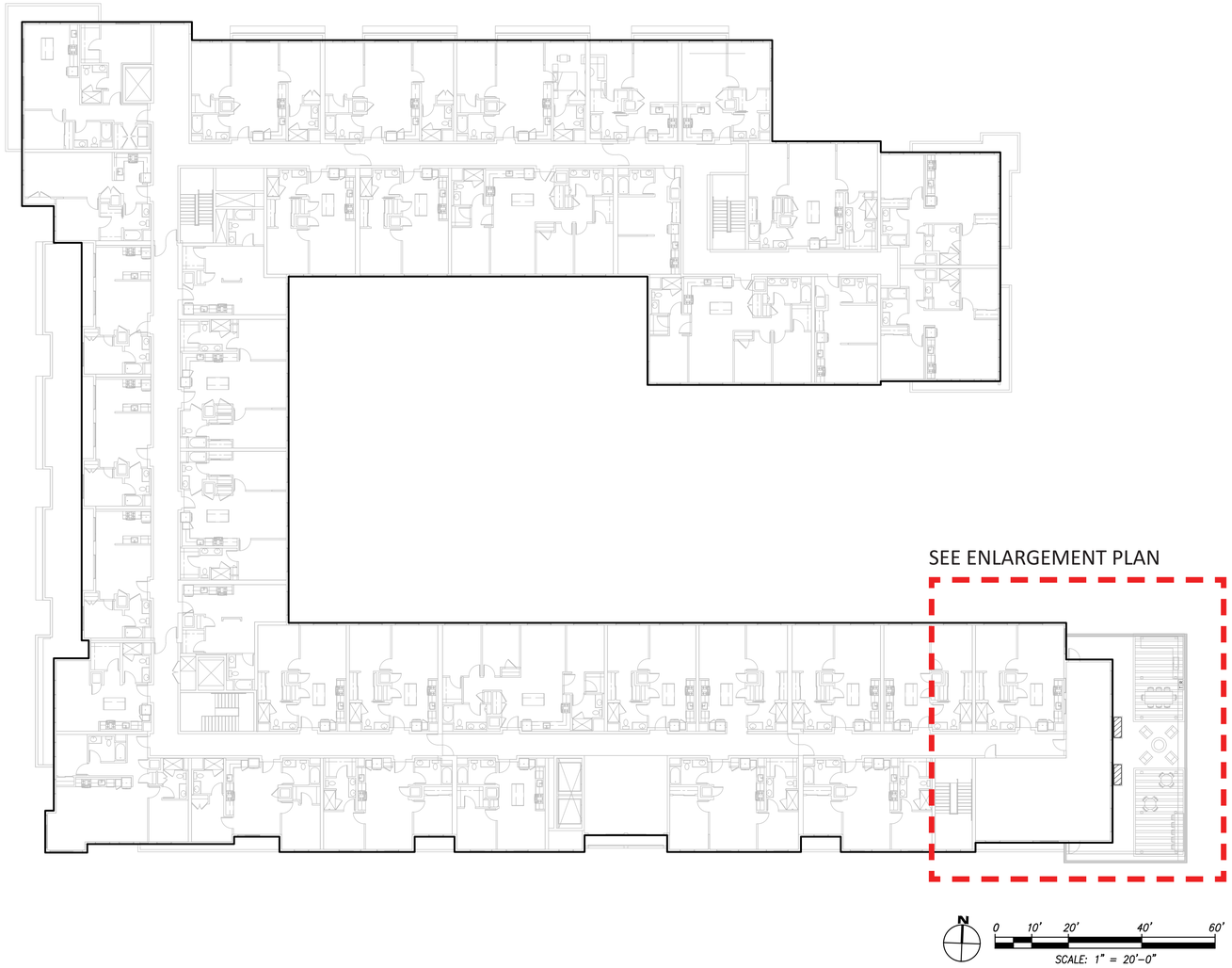
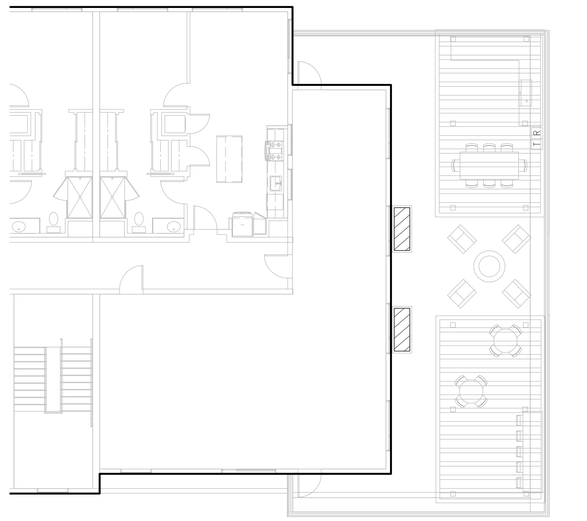
HILLSIDE SUCCESSION AREA

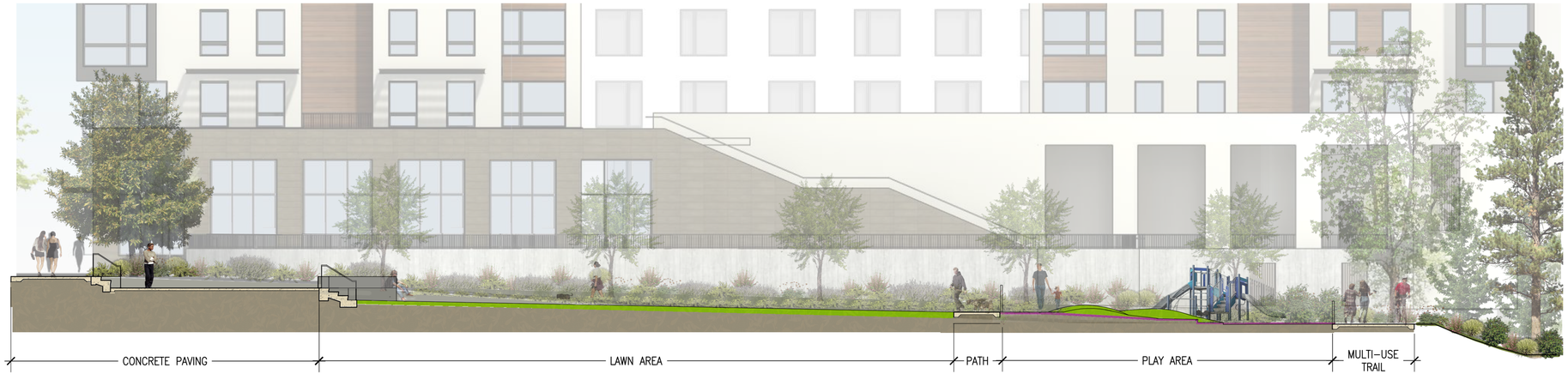
SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	WTR USE
	AESCULUS CALIFORNICA	CALIFORNIA BUCKEYE	24" BOX	L
	ACER MACROPHYLLUM	BIG LEAF MAPLE	24" BOX	L
	ARBUTUS MENZIESII	PACIFIC MADRONE	24" BOX	L
	CALOCEDRUS DECURRENS	INCENSE CEDAR	24" BOX	L
	CEANOTHUS 'RAY HARTMAN'	WILD LILAC	24" BOX	L
	HESPEROCYPARIS MACROCARPA	MONTEREY CYPRESS	24" BOX	L
	FREMONTODENDRON CALIFORNICUM	FREMONTIA	24" BOX	L

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WTR USE
MEDIUM AND SMALL SHRUBS					
	CALAMAGROSTIS FOLIOSA	MENDOCINO REED GRASS	5 GAL	4'-0" OC	L
	EPILOBIUM CANUM 'CATALINA'	CALIFORNIA FUCHSIA	5 GAL	5'-0" OC	L
	HELICTOTRICHON SEMPERVIRENS	BLUE OAT GRASS	5 GAL	5'-0" OC	L
	RIBES SANGUINEUM	PINK FLOWERED CURRENT	5 GAL	5'-0" OC	L
	ROSMARINUS OFFICINALIS	ROSEMARY	5 GAL	4'-0" OC	L
	PITTOSPORUM CRASSIFOLIUM	KARO	5 GAL	5'-0" OC	L
	POLYSTICHUM MUNITUM	WESTERN SWORD FERN	5 GAL	4'-0" OC	L
ACCENT PLANTING					
	AGAVE ATTENUATA	FOX TAIL AGAVE	5 GAL	6'-0" OC	L
	AGNIGOZANTHOS	KANGAROO PAW	5 GAL	4'-0" OC	L
	CIIVA MINIATA	KAFIR LILY	5 GAL	4'-0" OC	L
	LIBERITA PEREGRINANS	ORANGE LIBERTIA	5 GAL	3'-0" OC	L
	SALVIA GREGGII	AUTUM SAGE	5 GAL	3'-0" OC	L
	SENECIO VITALIS	NARROW LEAF CHALKSTICKS	5 GAL	5'-0" OC	L
GROUNDCOVERS					
	ALOE DISTANS	JEWEL ALOE	1 GAL	5'-0" OC	L
	AEONIUM CANARIENSE	HOUSELEEK	1 GAL	3'-0" OC	L
	AJUGA REPETENS	BLUE BUGLE	1 GAL	2'-0" OC	L
	CEANOTHUS	CALIFORNIA LILAC	1 GAL	5'-0" OC	L
	THYMUS	THYME	1 GAL	5'-0" OC	L
STORMWATER PLANTING					
	ACHILLEA MILLEFOLIUM	YARROW	1 GAL	2'-0" OC	L
	CHONDROPETALUM TECORUM	CAPE RUSH	1 GAL	3'-0" OC	L
	ERIOGONUM LATIFOLIUM	COAST BUCKWHEAT	1 GAL	3'-0" OC	L
	LOMANDRA LONGIFOLIA	DWARF MAT RUSH	1 GAL	4'-0" OC	L
	PENSTEMON 'MARGARITA BOP'	BEARD TONGUE	1 GAL	3'-0" OC	L
	CERCIS CANADENSIS 'FOREST PANSY'	EASTERN REDBUD	1 GAL	3'-0" OC	L
TURF					
	–	90/10 TALL FESCUE/ BLUE GRASS BLEND	SOD	–	–
MULCH ONLY AREA					
	3" LAYER OF MULCH	–	–	–	–



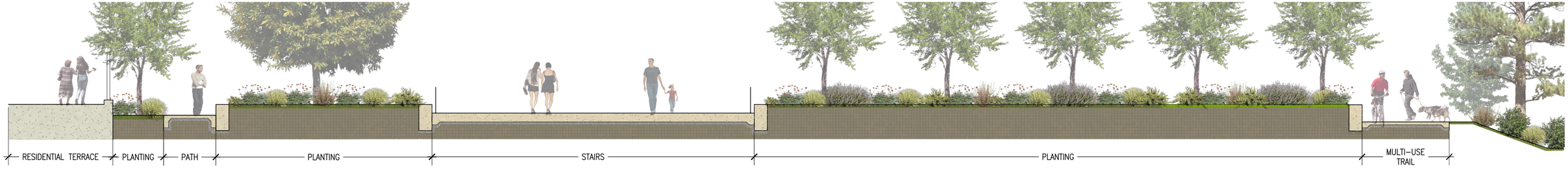


SEE SHEET L-8 FOR FULL PLANTING PLAN PALETTE



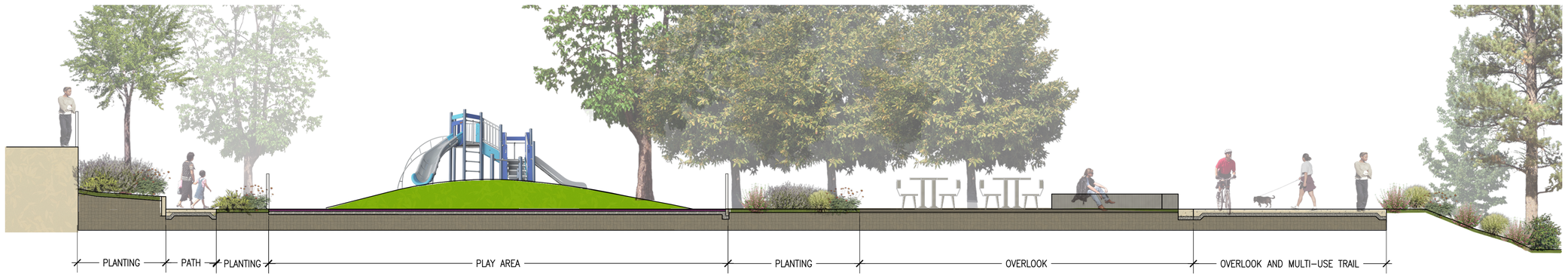
A OVERLOOK PARK SECTION ELEVATION 1

SCALE: 1/8" = 1'–0"



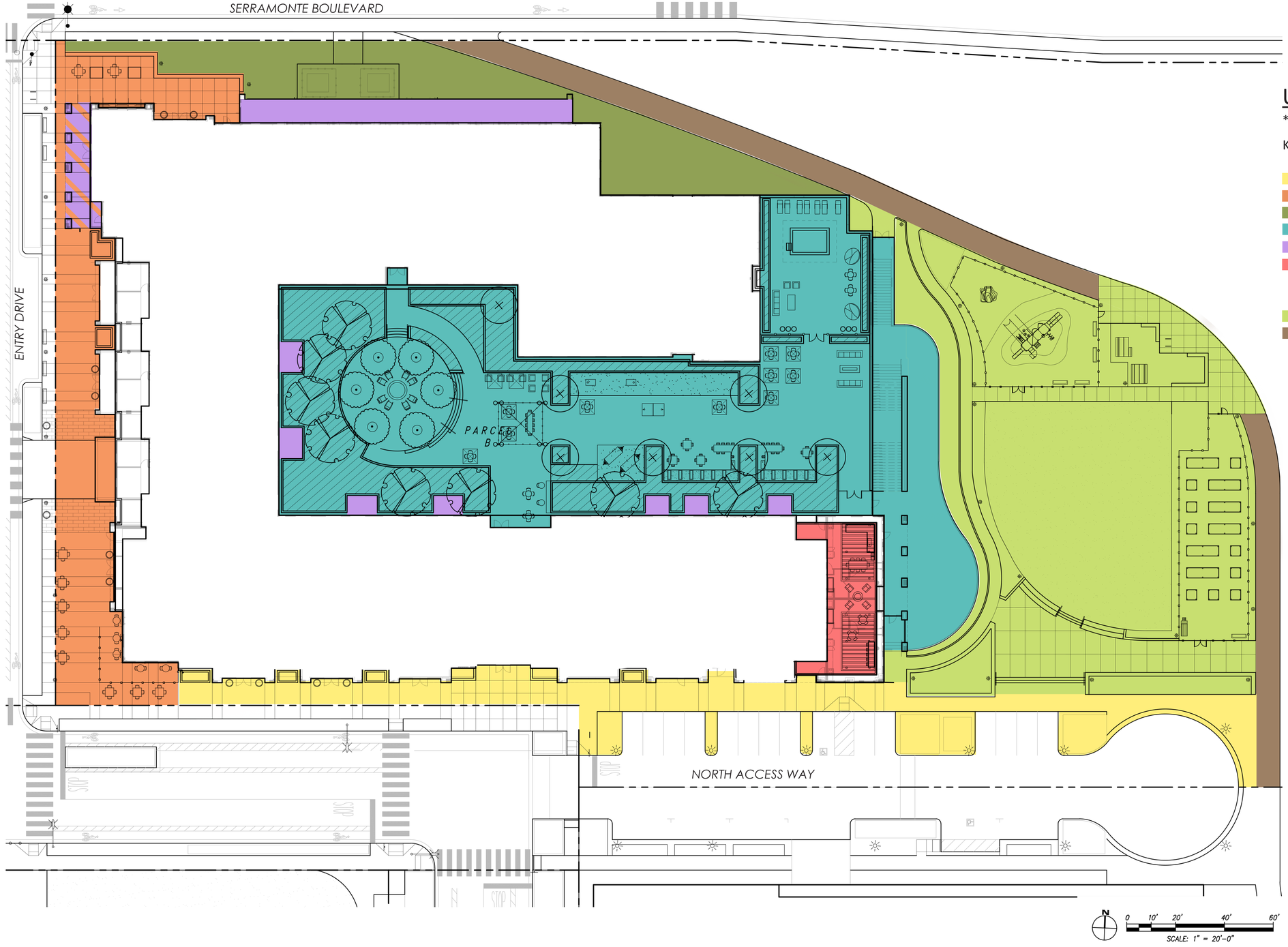
B OVERLOOK PARK SECTION 1

SCALE: 3/16" = 1'–0"



C OVERLOOK PARK SECTION 2

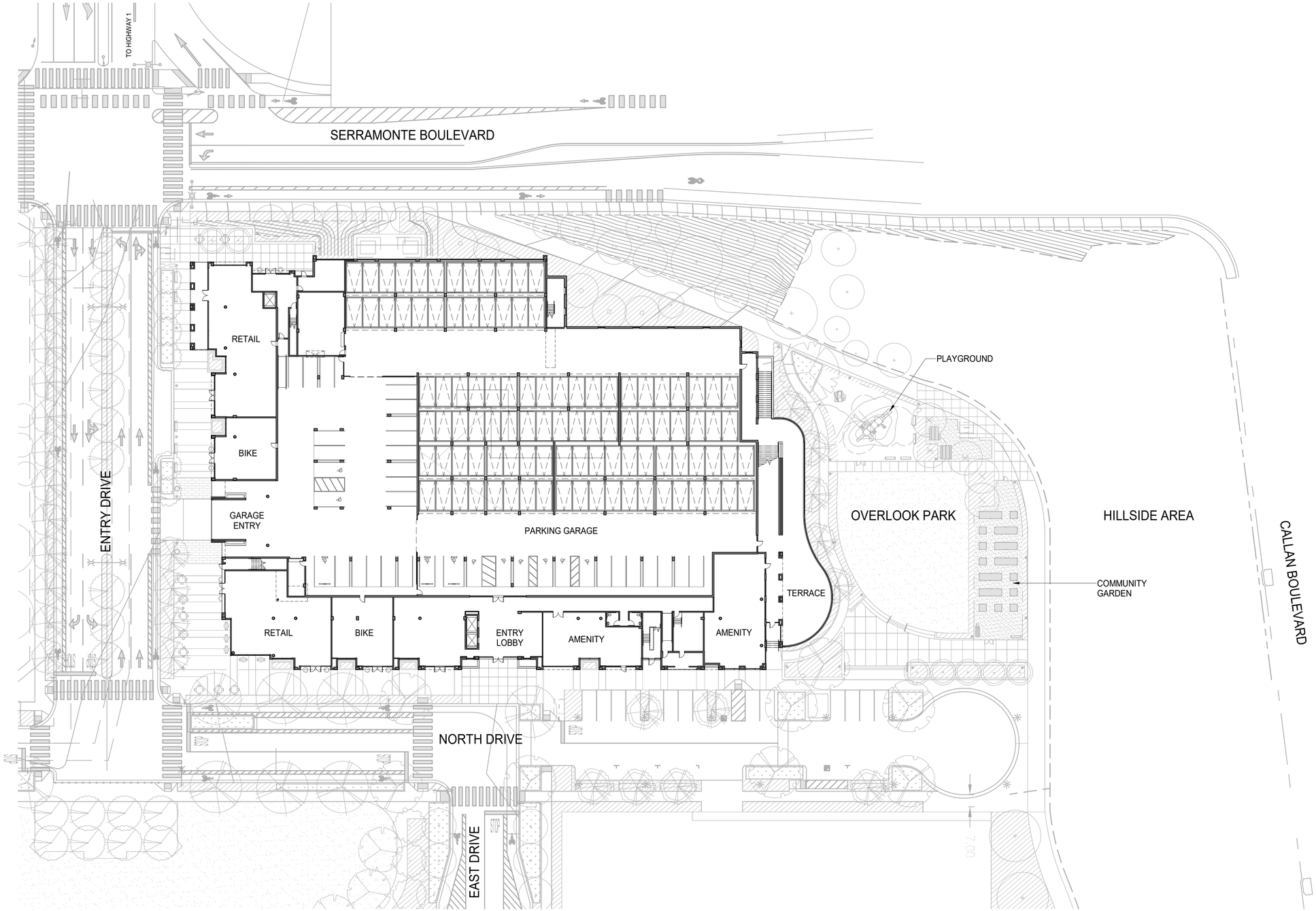
SCALE: 3/16" = 1'–0"



USEABLE OPEN SPACE SUMMARY

*SEE ARCHITECTURE DRAWINGS FOR PRIVATE BALCONY & DECK AREAS

KEY	NAME	AREA	LEVEL
	PEDESTRIAN STREETSCAPE	6,505 SF	GROUND FLOOR
	RETAIL PLAZA	6,965 SF	GROUND FLOOR
	LANDSCAPE (<10%)	5,390 SF	GROUND FLOOR
	COURTYARD & TERRACE	24,360 SF	GROUND/2ND
	*PRIVATE BALCONIES OR DECKS	2,585 SF	ALL LEVELS
	ROOF TERRACE	1,346 SF	6TH FLOOR
	SUBTOTAL	**47,151 SF**	
	PARK(<10%)	22,295 SF	GROUND FLOOR
	RECREATION TRAIL	5,985 SF	GROUND FLOOR
	SUBTOTAL	**28,280 SF**	
	TOTAL	**75,431 SF**	



TRUE NORTH

0' 15' 30' 60'

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JETT landscape Architecture + Design

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PLACEWORKS

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SERRAMONTE DEL REY, PARCEL B
DALY CITY, CA

Brookwood Advisors

A1.0
SITE PLAN
8/25/2023
1" = 30'-0"

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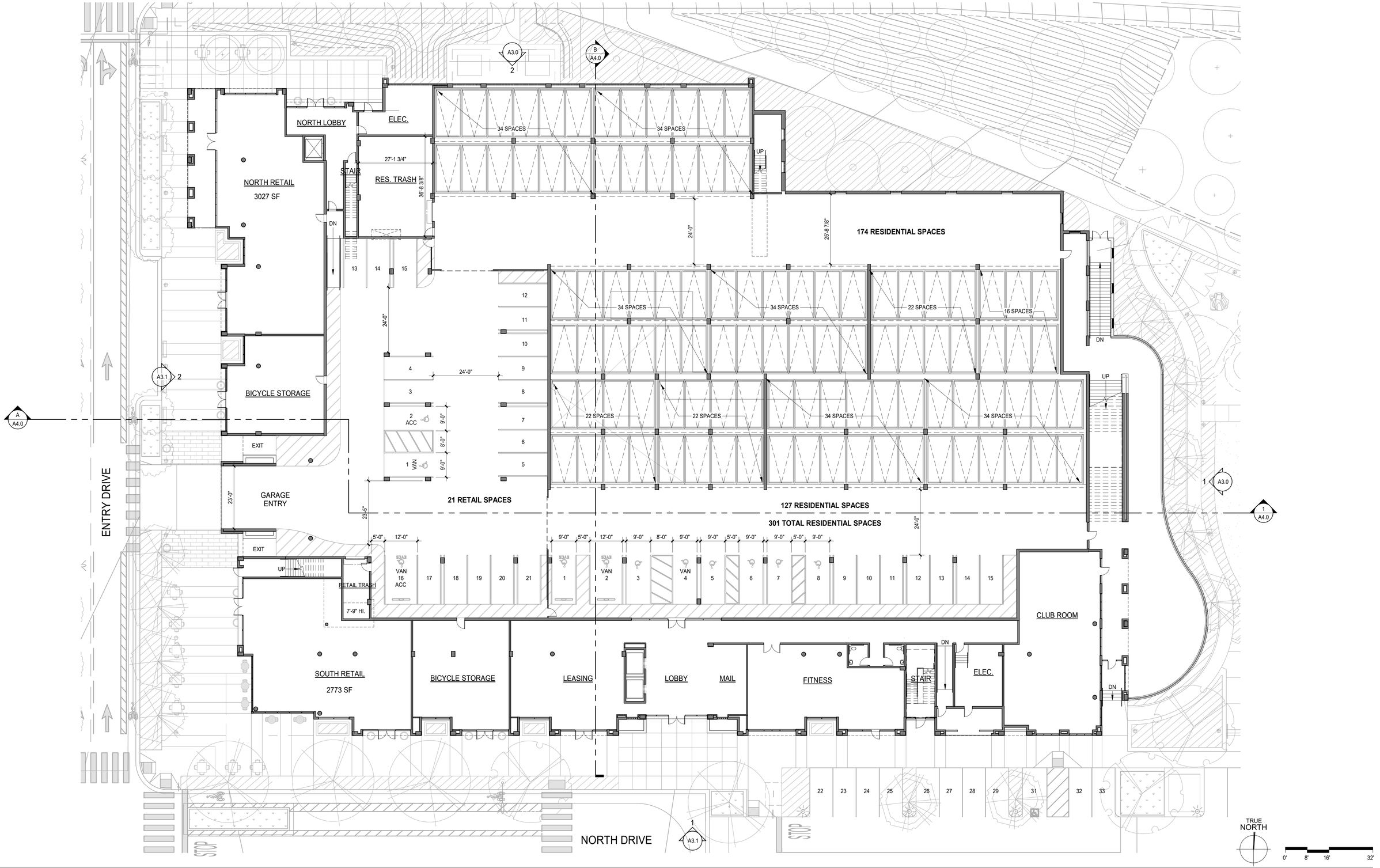

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JETT landscape Architecture + Design

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DALY CITY, CA

Brookwood Advisors

A2.1
GROUND FLOOR PLAN
8/25/2023
1/16" = 1'-0"

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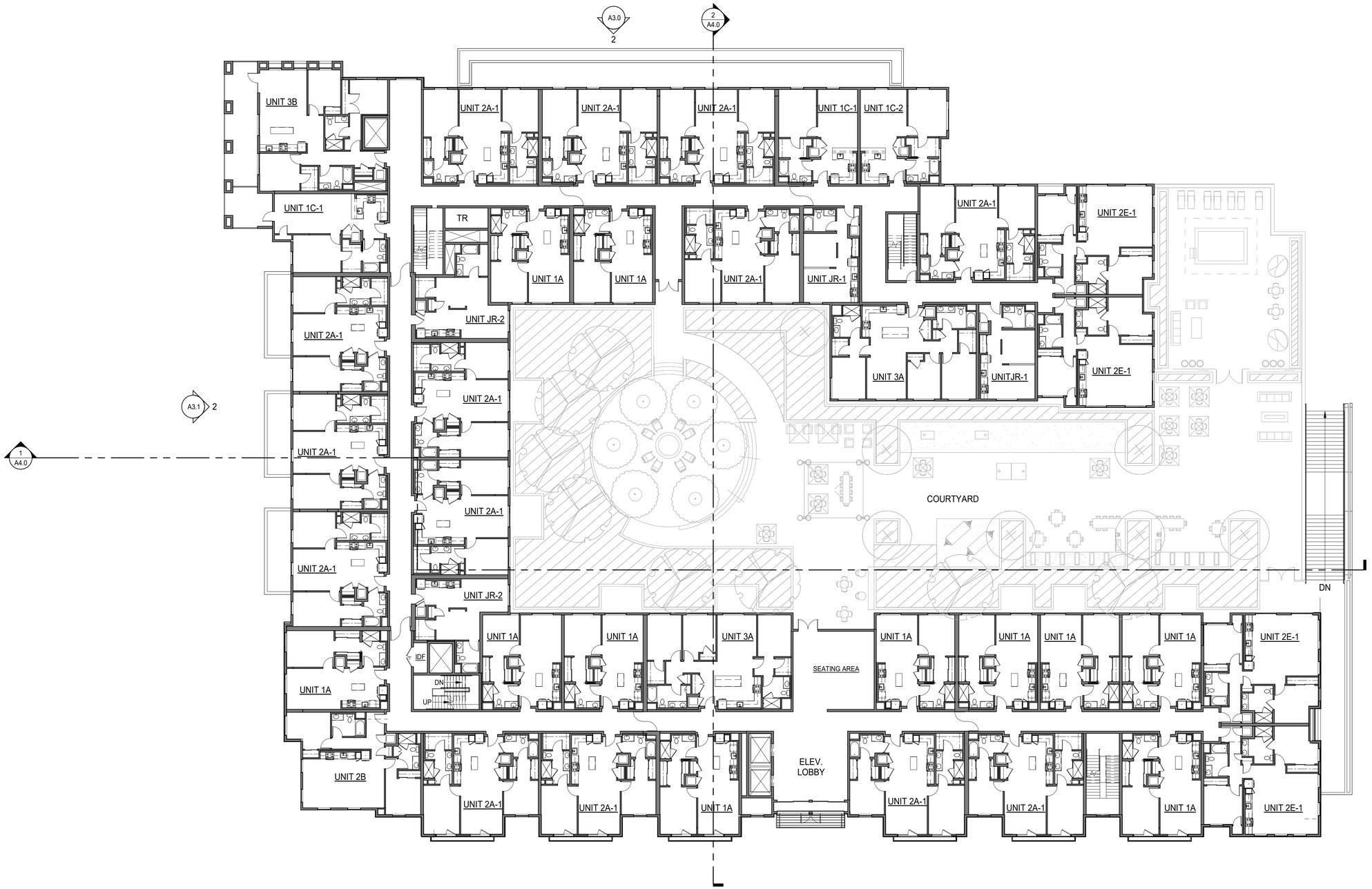

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SERRAMONTE DEL REY, PARCEL B
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A2.2
2ND FLOOR / PODIUM PLAN
8/25/2023
1/16" = 1'-0"

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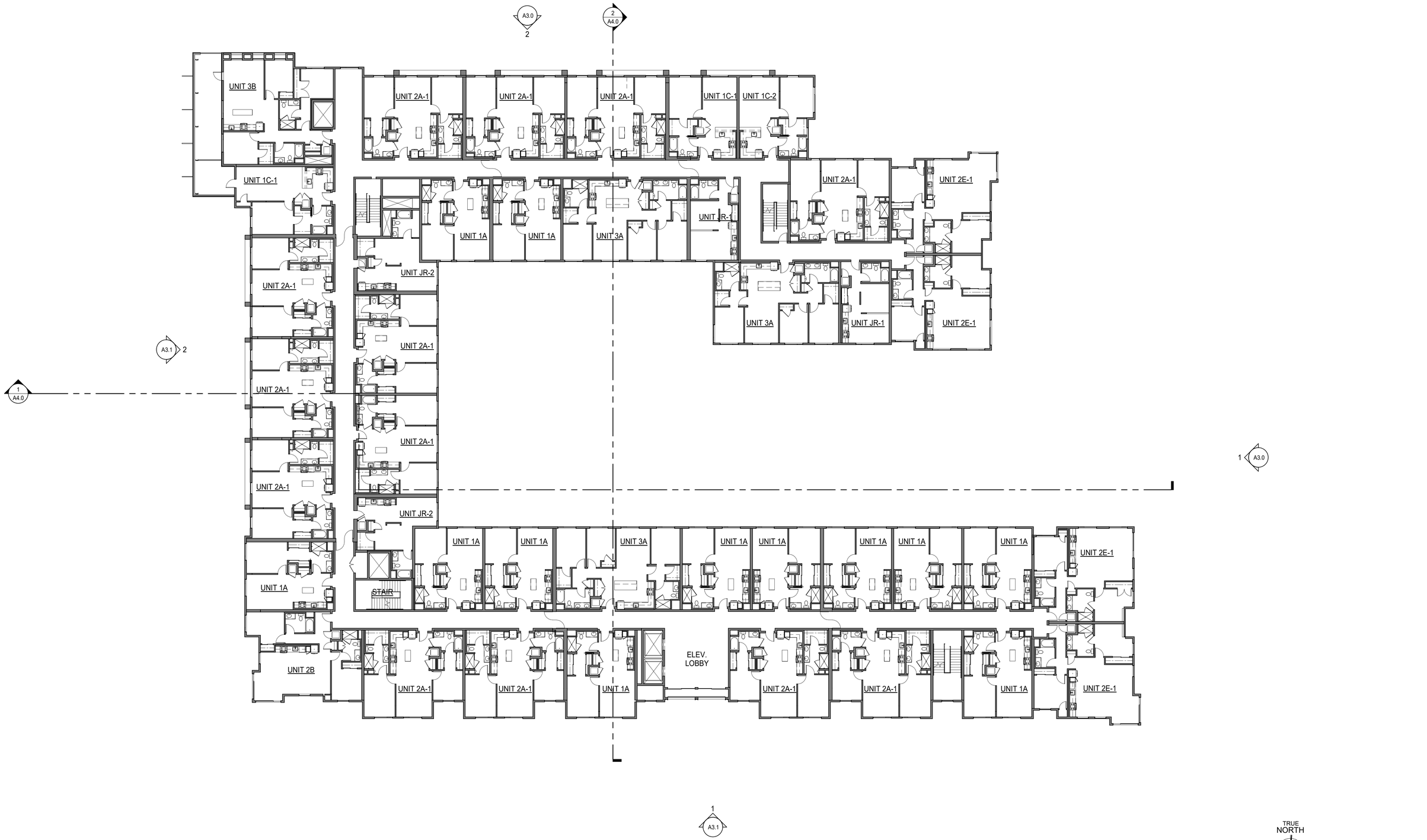

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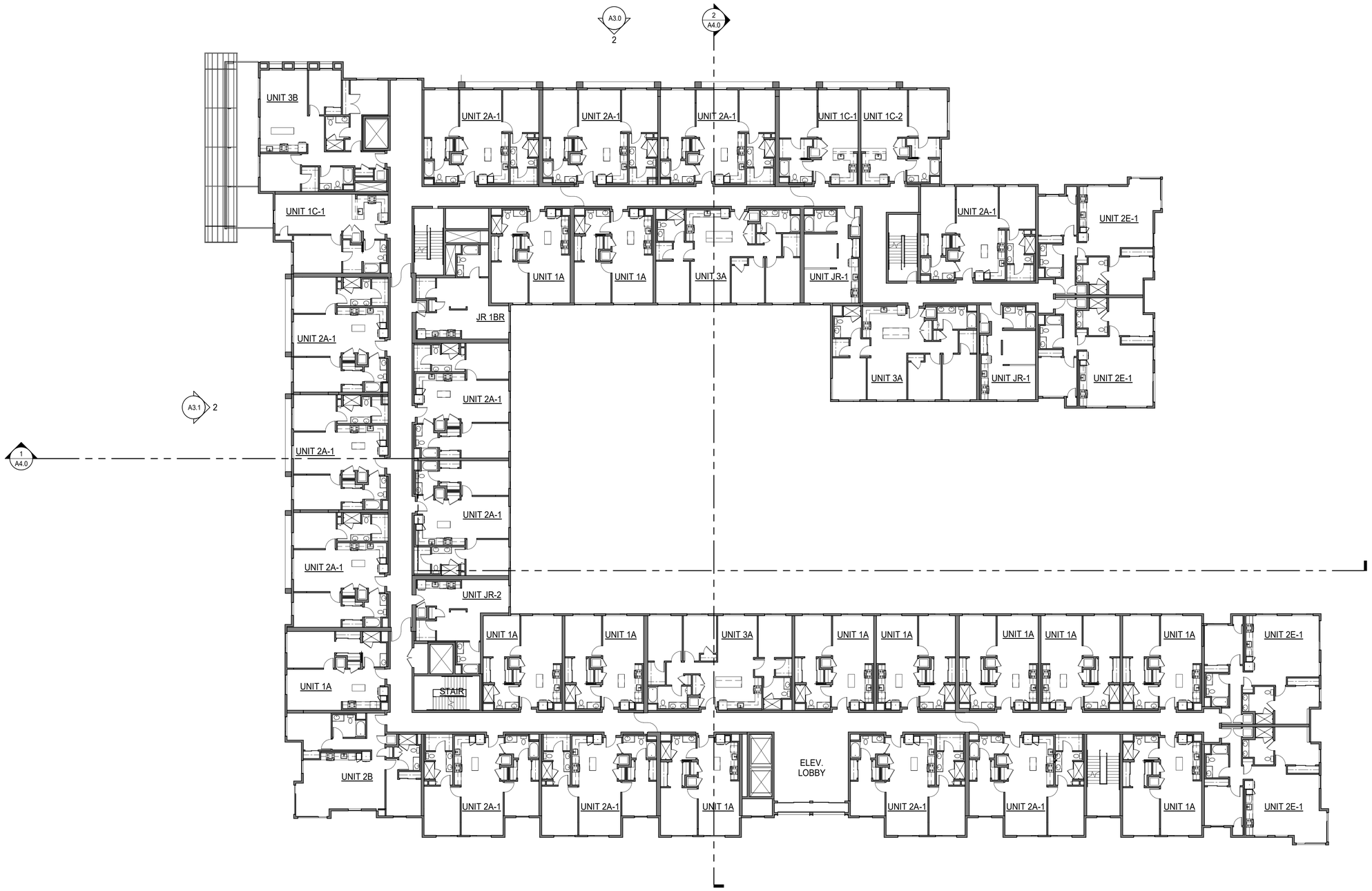
SERRAMONTE DEL REY, PARCEL B
DALY CITY, CA

Brookwood Advisors

A2.3

3RD FLOOR PLAN
8/25/2023
1/16" = 1'-0"



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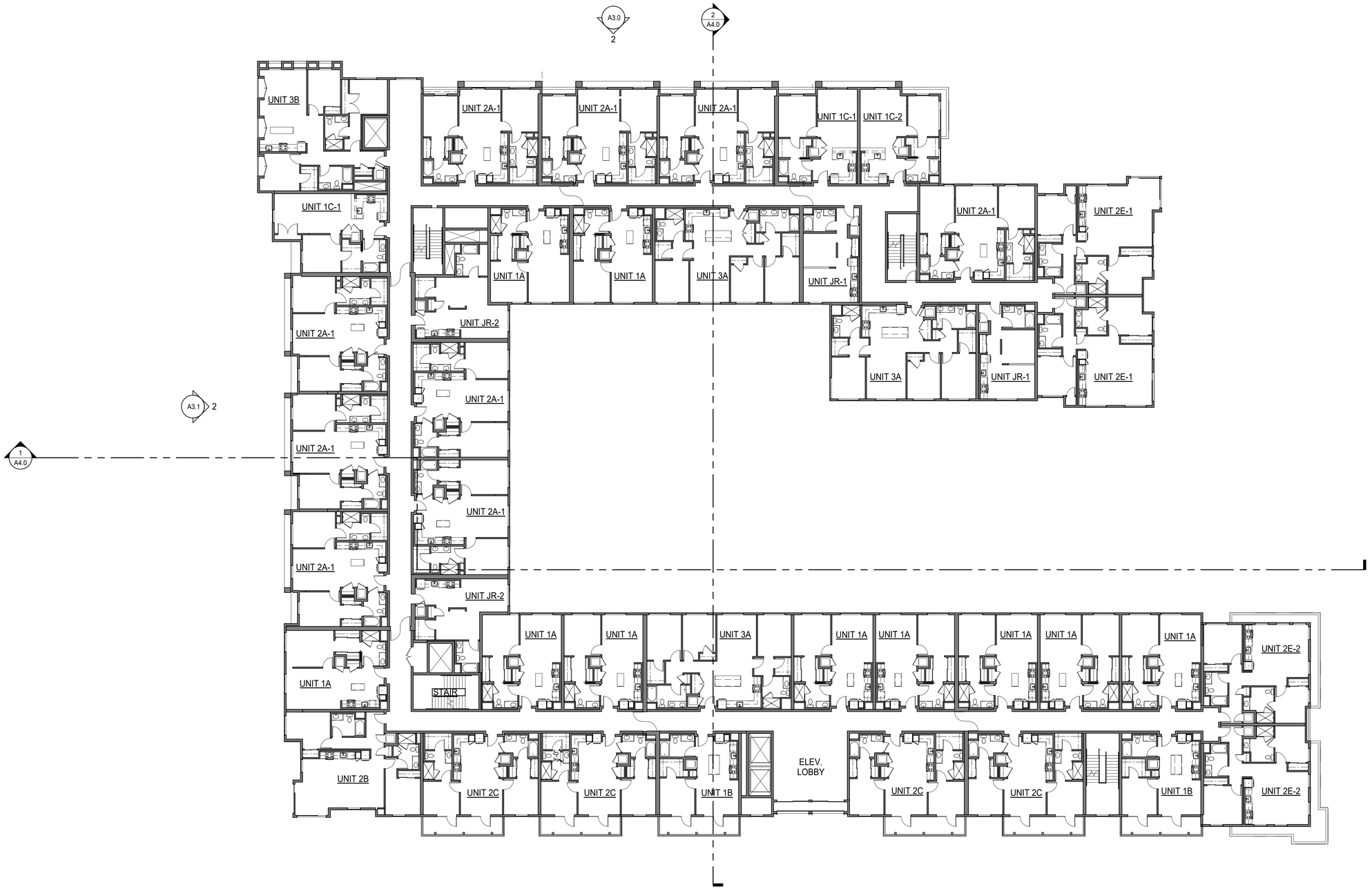
A2.4

4TH FLOOR PLAN
8/25/2023
1/16" = 1'-0"



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A2.5
5TH FLOOR PLAN
8/25/2023
1/16" = 1'-0"

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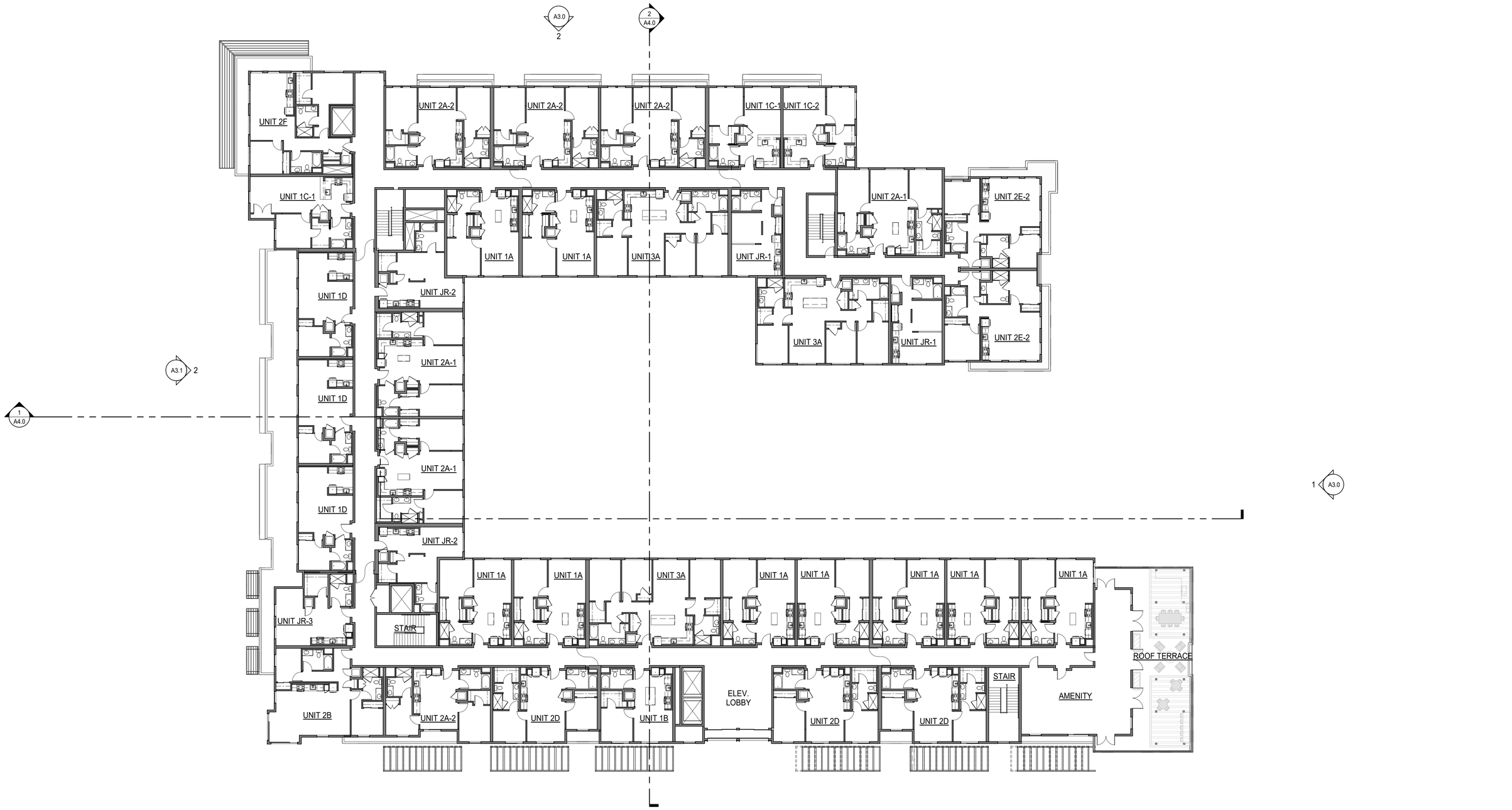

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A2.6
6TH FLOOR PLAN
8/25/2023
1/16" = 1'-0"

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A2.7
ROOF PLAN
8/25/2023
1/16" = 1'-0"

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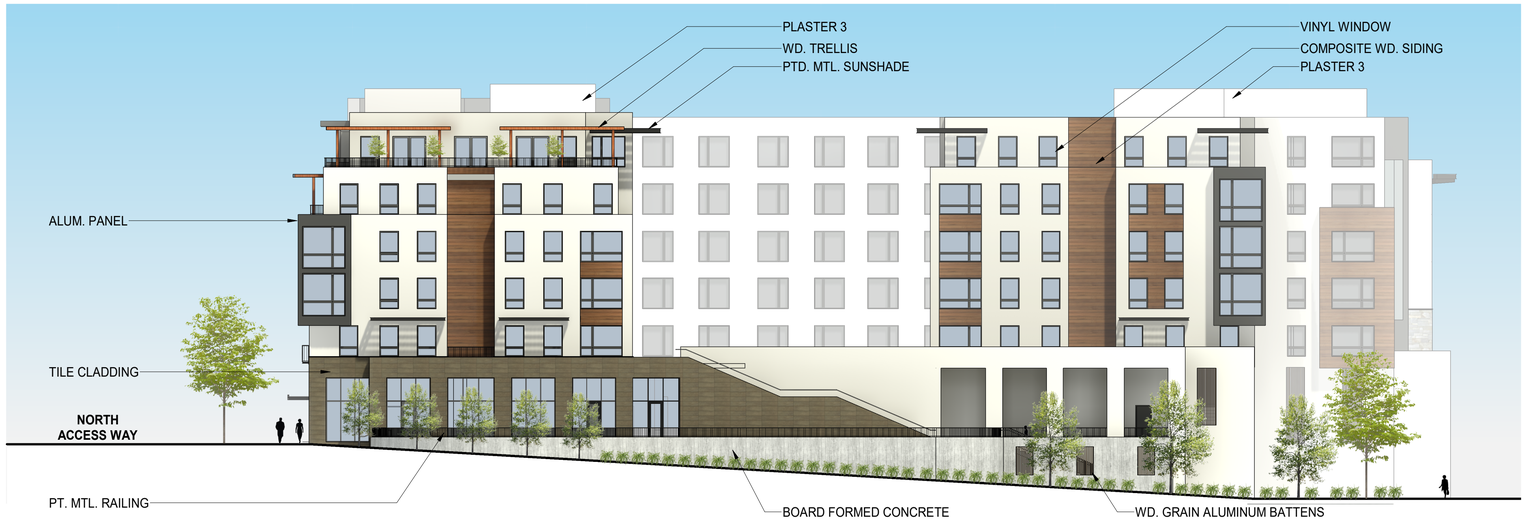

1 A3.0 EAST ELEVATION (OVERLOOK PARK)
1/16" = 1'-0"

2 A3.0 NORTH ELEVATION (SERRAMONTE BLVD.)
1/16" = 1'-0"

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A3.0
EAST & NORTH ELEVATION
8/25/2023
1/16" = 1'-0"

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1 A3.1 SOUTH ELEVATION (NORTH DRIVE)
1/16" = 1'-0"

2 A3.1 WEST ELEVATION (ENTRY DRIVE)
1/16" = 1'-0"

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A3.1
SOUTH & WEST ELEVATION
8/25/2023
1/16" = 1'-0"

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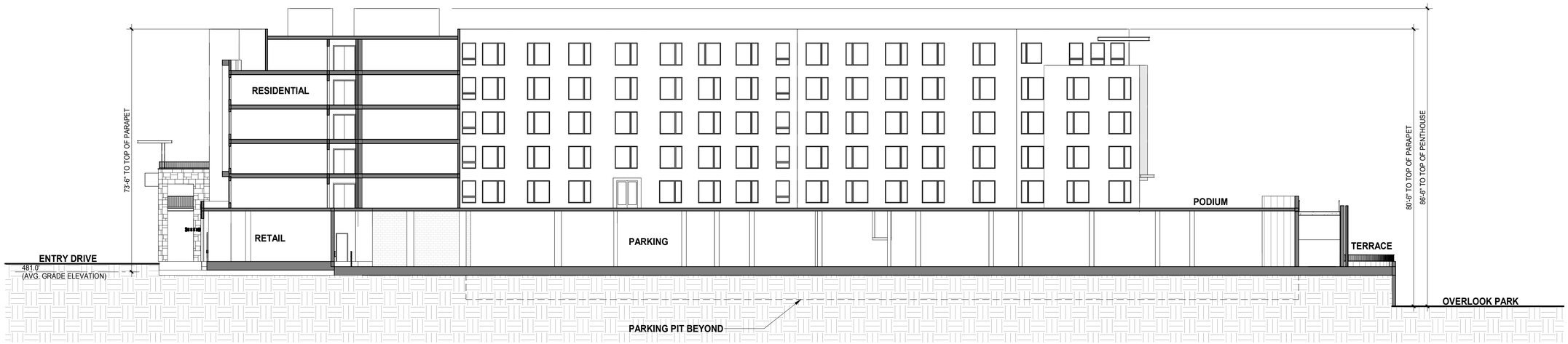
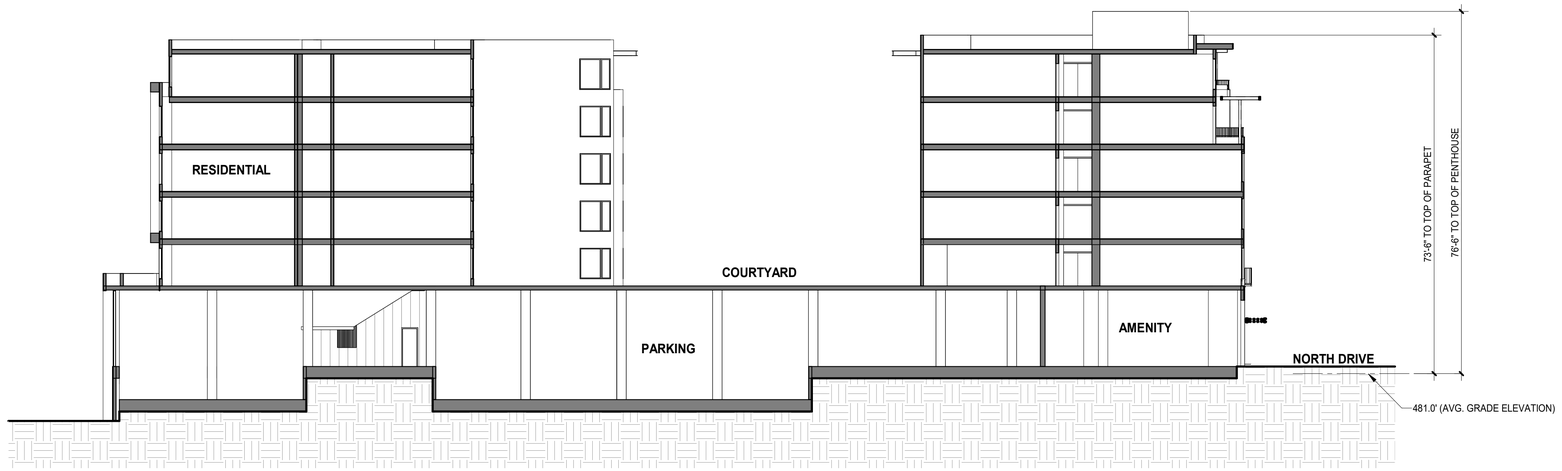


1 A4.0 EAST - WEST SECTION (FACING NORTH)
1/16" = 1'-0"



B

2 A4.0 NORTH - SOUTH SECTION (FACING EAST)
1/16" = 1'-0"

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A4.0
BUILDING SECTIONS
8/25/2023
1/16" = 1'-0"

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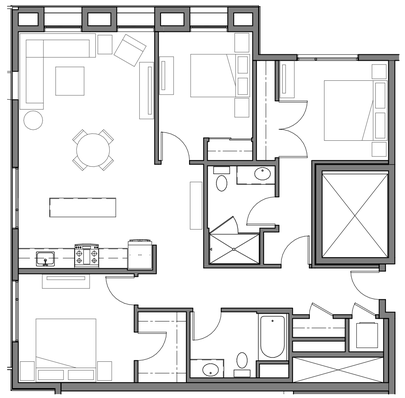
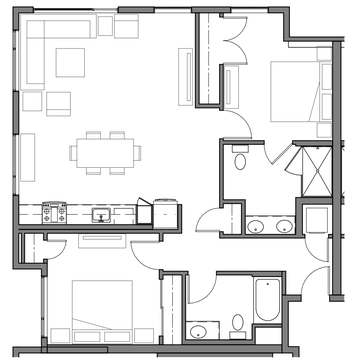
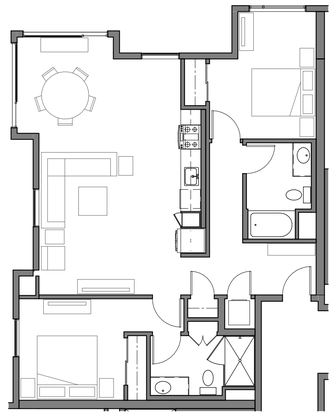


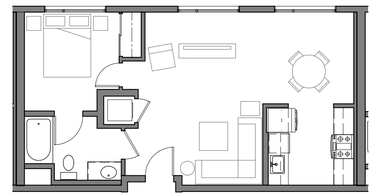
13 A5.0 UNIT 3B
1/8" = 1'-0" 1505 SF



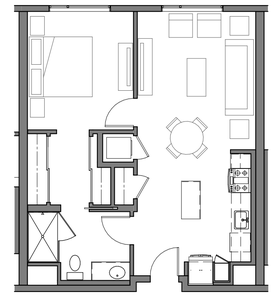
11 A5.0 UNIT 2E
1/8" = 1'-0" 1159 SF



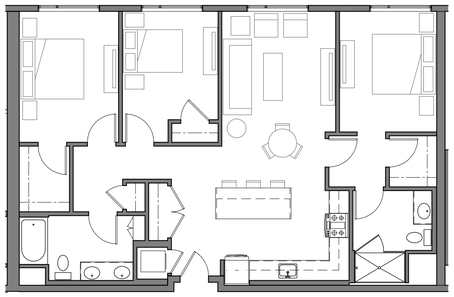
8 A5.0 UNIT 2B
1/8" = 1'-0" 1171 SF



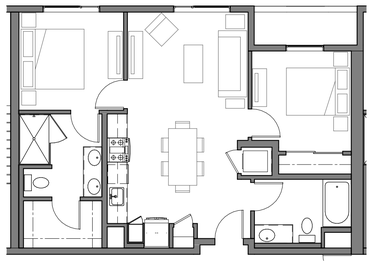
15 A5.0 UNIT 1D
1/8" = 1'-0" 691 SF



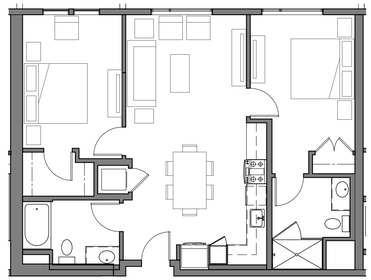
3 A5.0 UNIT 1A
1/8" = 1'-0" 745 SF



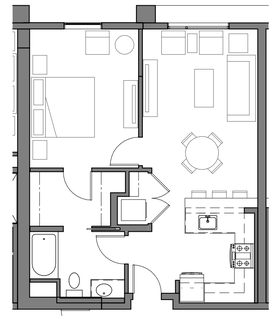
12 A5.0 UNIT 3A
1/8" = 1'-0" 1350 SF



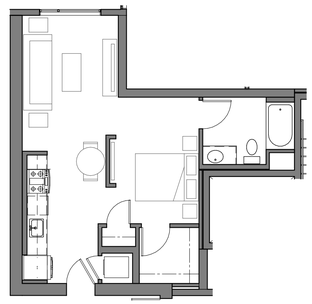
10 A5.0 UNIT 2D
1/8" = 1'-0" 890 SF



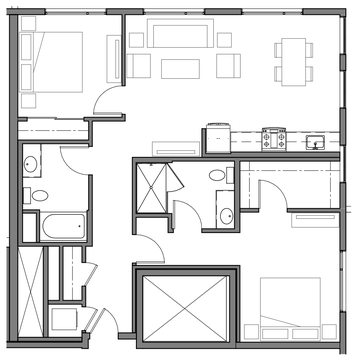
7 A5.0 UNIT 2A-2
1/8" = 1'-0" 1007 SF



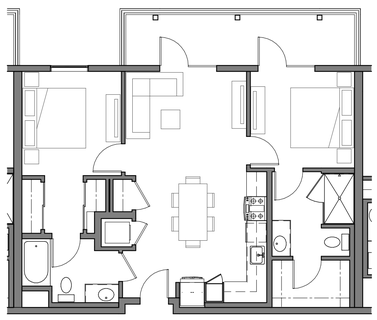
5 A5.0 UNIT 1C
1/8" = 1'-0" 750 SF



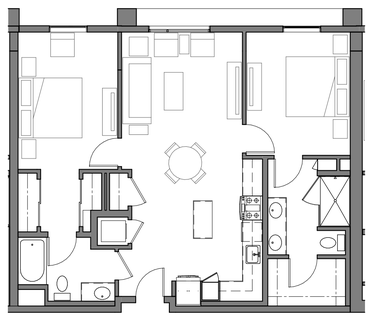
2 A5.0 UNIT ST/JR-2
1/8" = 1'-0" 607 SF



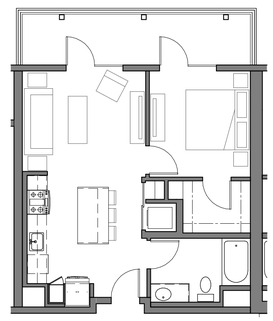
14 A5.0 UNIT 2F
1/8" = 1'-0" 1242 SF



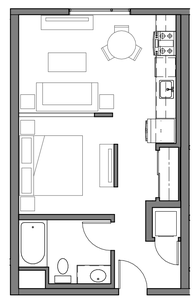
9 A5.0 UNIT 2C
1/8" = 1'-0" 931 SF



6 A5.0 UNIT 2A-1
1/8" = 1'-0" 1080 SF



4 A5.0 UNIT 1B
1/8" = 1'-0" 649 SF



1 A5.0 UNIT ST/JR-1
1/8" = 1'-0" 539 SF

0' 4' 8' 16'

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DALY CITY, CA

Brookwood Advisors

A5.0
UNIT PLANS
8/25/2023
1/8" = 1'-0"

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JEFFERSON UNION HIGHSCHOOL DISTRICT
699 SERRAMONTE BOULEVARD
TENTATIVE MAP
DALY CITY, SAN MATEO COUNTY, CA

699 SERRAMONTE BOULEVARD
TENTATIVE MAP LOT SUMMARY (*)

COMMERCIAL/RESIDENTIAL PARCELS				
LOT/PARCEL NO.	MAX NO. UNITS	ANTICIPATED NO. DWELLING UNITS**	AREA ACRES	USE
"A"	122	122	3.68	LOT FOR RESIDENTIAL (APARTMENT) BUILDING
"B"	210	201 (**)	4.26	LOT FOR COMMERCIAL/RESIDENTIAL (APARTMENT) BUILDING
"C"	152	152 (**)	1.93	LOT FOR A RESIDENTIAL (APARTMENT) BUILDING
"D"	270	188 (**)	2.83	LOT FOR RESIDENTIAL (APARTMENT) BUILDING
"E"	330	290 (**)	2.99	LOT FOR RESIDENTIAL (APARTMENT) BUILDING
"F"	400	282 (**)	3.99	LOT FOR RESIDENTIAL (APARTMENT) BUILDING
1	–	–	0.47	COMMON AREA FOR ROADWAY PURPOSES
2	–	–	0.65	COMMON AREA FOR ROADWAY PURPOSES
3	–	–	0.30	COMMON AREA FOR ROADWAY PURPOSES
4	–	–	0.44	COMMON AREA FOR ROADWAY PURPOSES
5	–	–	0.62	COMMON AREA FOR ROADWAY PURPOSES
TOTAL STREET PARCEL IN PLAN	–	–	2.48	
TOTAL PLAN AREA	–	–	22.16	
LOT 3	–	–	2.59	EXISTING PRIVATE ROAD
SUBTOTAL	**1484**	**1,235**	**24.75**	
TOTAL NUMBER OF DWELLING UNITS (***)				**1,235 TOTAL UNITS**

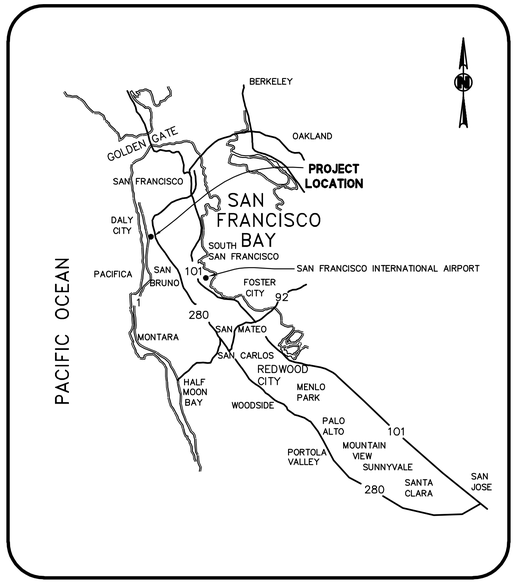
LOT 3 IS COMPRISED OF WEST DRIVE SOUTH OF PARCEL E, THE ROUNDABOUT AND CAMPUS DRIVE SOUTH TO HICKEY BOULEVARD

* SEE GENERAL NOTES THIS SHEET
** UNIT COUNT PER PARCEL MAY CHANGE
*** MAXIMUM DWELLING UNITS FOR PROPOSED DEVELOPMENT SHALL NOT EXCEED 1,235.

LEGEND

	PROPOSED	EXISTING
PROPERTY LINE		
LOT LINE		
EASEMENT		
EASEMENT		
CONTOUR LINE	510	510
STORM DRAIN LINE		
SANITARY SEWER LINE	SS	SS
WATER LINE	W	W
FIRE WATER LINE	WF	WF
OVERHEAD LINE	OH	OH
ELECTRICAL LINE	E	E
TELEPHONE LINE	T T	T T
FIBER OPTIC LINE	FO	FO
STREET LIGHT LINE	SL	SL
GAS LINE	G	G
JOINT TRENCH	JT	JT
STREET/PARKING LIGHT		
MANHOLE		
CLEANOUT	CO	
DROP INLET, UTILITY BOX		
AREA DRAIN		

811 Know what's **below.** **Call** before you dig.



LOCATION MAP
NTS

VICINITY MAP
NTS

ABBREVIATIONS

AB	AGGREGATE BASE
AC	ASPHALT CONCRETE
AD	AREA DRAIN
APN	ASSESSORS PARCEL NUMBER
APPROX.	APPROXIMATE
ARV	AIR RELEASE VALVE
BLDG	BUILDING
BM	BENCH MARK
BO	BLOWOFF
BW	BACK OF WALK
℄	CENTER LINE
CB	CATCH BASIN
C&G	CURB & GUTTER
CIP	CAST IRON PIPE
CO	CLEANOUT
CONC	CONCRETE
CR	CURB RAMP
CY	CUBIC YARD
DI	DUCTILE IRON
DIA	DIAMETER
DIP	DUCTILE IRON PIPE
DWY	DRIVEWAY
(E)	EXISTING
E	ELECTRICAL
EA	EACH
EP	EDGE OF PAVEMENT
ESMT	EASEMENT
E.V.A.E.	EMERGENCY VEHICLE ACCESS EASEMENT
EX	EXISTING
F/C	FACE OF CURB
FDC	FIRE DEPARTMENT CONNECTION
FF	FINISHED FLOOR ELEVATION
FG	FINISHED GRADE
FH	FIRE HYDRANT
FL	FLOW LINE
FS	FINISHED SURFACE
FT	FEET
G	GAS
GALV	GALVANIZED
GB	GRADE BREAK
GR	GRADE
GV	GATE VALVE
HP	HIGH POINT
HV	HIGH VOLTAGE
ID	INSIDE DIAMETER
IEE	INGRESS/EGRESS EASEMENT
IN	INCHES
INV	INVERT
JP	JOINT POLE
JT	JOINT TRENCH
L	LENGTH
LB	POUND(S)
LF	LINEAR FEET
MAX	MAXIMUM
MH	MANHOLE
MIN	MINIMUM
MISC	MISCELLANEOUS
MON	MONUMENT
NO., #	NUMBER
NTS	NOT TO SCALE
OH	OVERHEAD
ℙ	PROPERTY LINE
PG&E	PACIFIC GAS AND ELECTRIC
PP	POWER POLE
PRV	PRESSURE REDUCING VALVE
PAE	PUBLIC ACCESS EASEMENT
PVC	POLYVINYL CHLORIDE
RCP	REINFORCED CONCRETE PIPE
R/W	RIGHT OF WAY
SD	STORM DRAIN
SDCO	STORM DRAIN CLEAN OUT
SDE	STORM DRAIN EASEMENT
SDMH	STORM DRAIN MANHOLE
SF	SQUARE FEET
SS	SANITARY SEWER
SSCO	SANITARY SEWER CLEANOUT
SSE	SANITARY SEWER EASEMENT
SSMH	SANITARY SEWER MANHOLE
STD	STANDARD
SW	SIDEWALK
T	TELEPHONE
TC	TOP OF CURB
TG	TOP OF GRATE
TYP	TYPICAL
UG	UNDER GROUND
VCP	VITRIFIED CLAY PIPE
W/	WITH
WE	WATER EASEMENT
WM	WATER METER
WV	WATER VALVE
W	WATER

BENCHMARK:

CITY OF DALY CITY MONUMENT "AG20" AT THE INTERSECTION OF SERRAMONTE BLVD. AND CALLAN BLVD. AT THE SOUTH WESTERLY SIDE OF SERRAMONTE SHOPPING CENTER.
ELEVATION = 415.472', NGVD DATUM

BASIS OF BEARINGS:

THE BEARING OF NORTH 11°23'04" WEST BETWEEN THE TWO FOUND MONUMENTS ON CALLAN BOULEVARD AS SHOWN ON THAT CERTAIN PARCEL MAP FILED FOR RECORD ON DECEMBER 18, 1985, IN BOOK 56 OF MAPS AT PAGES 68, SAN MATEO COUNTY RECORDS, WAS TAKEN AS THE BASIS OF BEARINGS FOR THIS MAP.

RECORD REFERENCES:

PARCEL A AS SHOWN ON THAT CERTAIN PARCEL MAP FILED DECEMBER 18, 1985 IN BOOK 56 OF PARCEL MAPS, PAGES 68 AND 69, RECORDS OF SAN MATEO COUNTY, CALIFORNIA. PARCEL 3 AS SHOWN ON THAT CERTAIN MAP FILED SEPTEMBER 12, 1986 IN BOOK 115 OF PARCEL MAPS, PAGES 35 AND 36.
091-211-230, 091-211-290.

UNAUTHORIZED CHANGES & USES:

THE ENGINEER PREPARING THESE PLANS WILL NOT BE RESPONSIBLE FOR, OR LIABLE FOR, UNAUTHORIZED CHANGES TO OR USES OF THESE PLANS. ALL CHANGES TO THESE PLANS MUST BE IN WRITING AND MUST BE APPROVED BY THE PREPARER OF THESE PLANS.

CONSTRUCTION CONTRACTOR AGREES THAT IN ACCORDANCE WITH GENERALLY ACCEPTED CONSTRUCTION PRACTICES, CONSTRUCTION CONTRACTOR WILL BE REQUIRED TO ASSUME SOLE AND COMPLETE RESPONSIBILITY FOR JOB SITE CONDITIONS DURING THE COURSE OF CONSTRUCTION OF THE PROJECT, INCLUDING SAFETY OF ALL PERSONS AND PROPERTY; THAT THIS REQUIREMENT SHALL BE MADE TO APPLY CONTINUOUSLY AND NOT BE LIMITED TO NORMAL WORKING HOURS, AND CONSTRUCTION CONTRACTOR FURTHER AGREES TO DEFEND, INDEMNIFY AND HOLD DESIGN PROFESSIONAL HARMLESS FROM ANY AND ALL LIABILITY, REAL OR ALLEGED, IN CONNECTION WITH THE PERFORMANCE OF WORK ON THIS PROJECT, EXCEPTING LIABILITY ARISING FROM THE SOLE NEGLIGENCE OF DESIGN PROFESSIONAL.

PROJECT INFORMATION

PROPERTY DESCRIPTION:	APN 091-211-230 EXISTING LAND USE: COMMERCIAL PROPOSED LAND USE: COMMERCIAL/RESIDENTIAL
OWNER/SUBDIVIDER:	JEFFERSON UNION HIGH SCHOOL DISTRICT 699 SERRAMONTE BOULEVARD, SUITE 100 DALY CITY, CA 94015
ENGINEER:	BKF ENGINEERS 255 SHORELINE DRIVE, SUITE 200 REDWOOD CITY, CA 94065 (650)482-6300
ACREAGE: EXISTING	19.83 AC
PROPOSED	19.71 AC
CURRENT ZONING:	PD-31/PD-31A
STORM DRAIN:	CITY OF DALY CITY
SEWAGE DISPOSAL:	NORTH SAN MATEO COUNTY SANITATION DISTRICT
WATER SUPPLY:	CITY OF DALY CITY
GAS AND ELECTRIC:	PG&E
TELEPHONE:	AT&T
CABLE:	COMCAST
FLOOD ZONE:	SITE CURRENTLY FALLS WITHIN AREAS OF MINIMAL FLOOD HAZARD IN ZONE X BASED ON FIRM MAP NUMBER 06081C0036F, DATED AUGUST 2, 2017.

SHEET INDEX

C1.0	TITLE SHEET
C2.0	EXISTING CONDITIONS PLAN
C2.1	EXISTING MAPPING PLAN
C3.0	CONCEPTUAL SITE PLAN
C3.1	CONCEPTUAL SITE PLAN
C3.2	PROPOSED MAPPING PLAN
C3.3	PROPOSED MAPPING PLAN
C4.0	CONCEPTUAL GRADING PLAN
C5.0	CONCEPTUAL UTILITY PLAN

GENERAL NOTES

1. EROSION CONTROL PLAN WILL CONFORM TO APPLICABLE CITY, STATE AND FEDERAL STANDARDS.

2. THE OWNER INTENDS TO FILE MULTIPLE FINAL MAPS FOR A TWELVE LOT SUBDIVISION FOR APARTMENTS AND COMMERCIAL PURPOSES.

3. THE NUMBER OF UNITS PER LOT IS SUBJECT TO CHANGE HOWEVER, THE MAXIMUM NUMBER OF UNITS WILL NOT BE EXCEEDED FOR THE DEVELOPMENT.

ENGINEER'S STATEMENT

THESE TENTATIVE MAPS HAVE BEEN PREPARED BY ME OR UNDER MY DIRECTION IN ACCORDANCE WITH STANDARD ENGINEERING PRACTICE.

Tim Heffernan

TIMOTHY HEFFERNAN
PROJECT MANAGER
BKF ENGINEERS
P.E. #67089

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HEFFERNAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

8/25/2023
DATE

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JUHSD PRECISE PLAN
TENTATIVE MAP
TITLE SHEET
SAN MATEO COUNTY CALIFORNIA
DALY CITY

No.	Revisions

Date: 8-25-2023
Scale: N/A
Design: TH
Drawn: MP
Approved: TH
Job No: 20180823

Drawing Number:
C1.0

DRAWING NAME: K:\2018\180823_Jefferson UHSD\ENG\SHEETS\PP-TM\Civ-PP-TM-01.dwg (0)
PLOTTING: 8-25-2023 2:13 PM PLOTTED BY: MJ

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SERRAMONTE BOULEVARD

EXISTING CAR STACKER

EXISTING PARKING LOT

PARCEL A

EXISTING APARTMENTS UNDER CONSTRUCTION

ENTRY DRIVE

EXISTING PARKING LOT

EAST HILLSIDE

CALLAN BOULEVARD

WEST HILLSIDE

EXISTING BUILDING TO REMAIN

EXISTING BUILDING

(E) HEADSTART BUILDING

(E) HEADSTART BUILDING

EXISTING BUILDING (DISTRICT OFFICES)

CAMPUS DRIVE

(E) BUILDING

EXISTING PARKING LOT

EXISTING PARKING LOT

EAST HILLSIDE

WEST HILLSIDE

EAST HILLSIDE

CAMPUS DRIVE

CALLAN BOULEVARD

GRAPHIC SCALE

50 0 50 100

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JUHSD PRECISE PLAN
TENTATIVE MAP
EXISTING CONDITIONS

SAN MATEO COUNTY CALIFORNIA

DALY CITY

REGISTERED PROFESSIONAL ENGINEER
TIMOTHY P. HEFFERNAN
No. 67089
Exp. 9/30/24
CIVIL
STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
Scale: AS SHOWN
Design: TH
Drawn: MP
Approved: TH
Job No: 20180823

Drawing Number:

C2.0

DRAWING NAME: K:\2018\180823_Jefferson UHSD\ENG\SHEETS\PP-TM\Civ-PP-TM-02.dwg (0)
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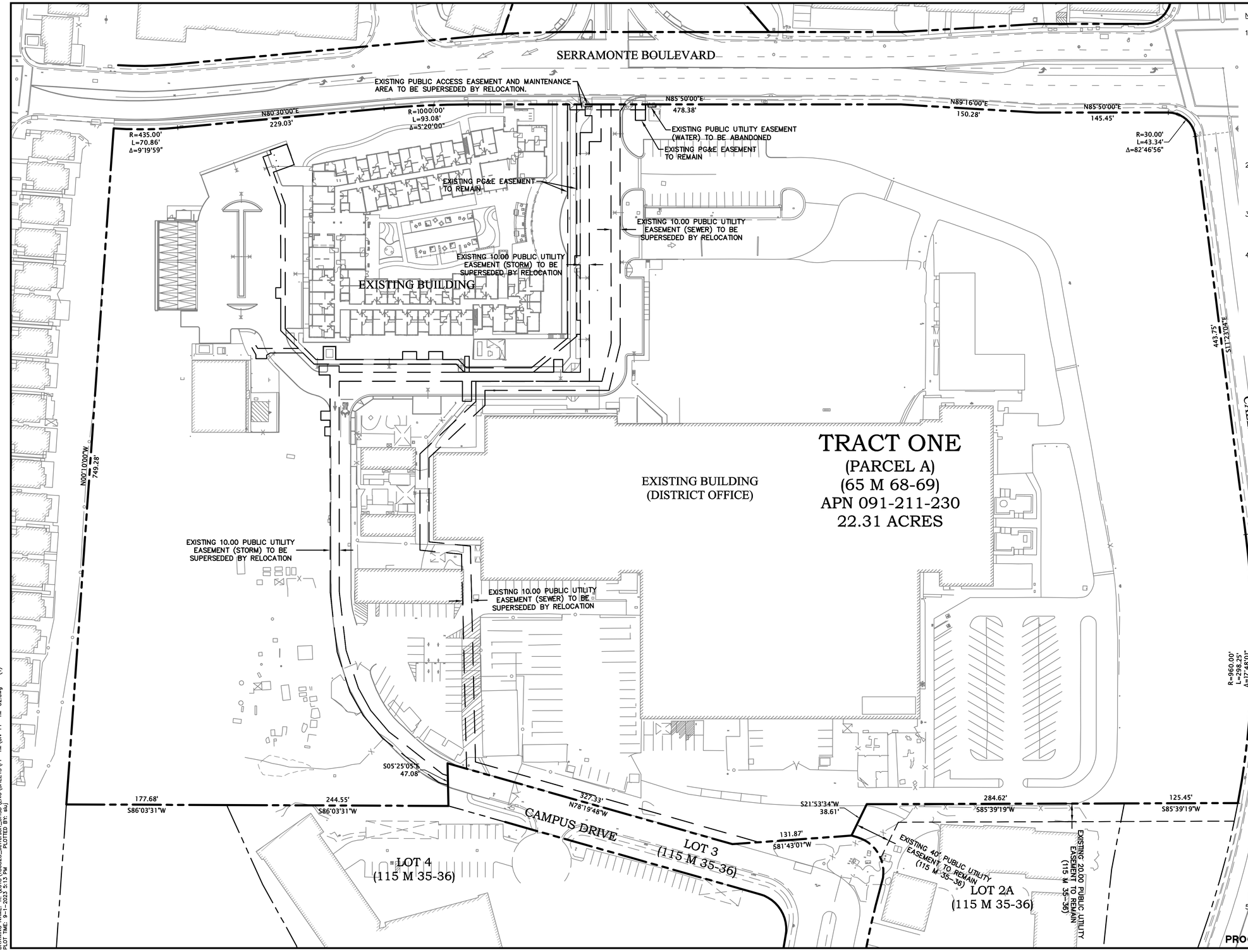

NOTES:

1. THE FOLLOWING ARE NON-PLOTABLE EASEMENTS REFERENCED IN THE TITLE REPORT. THE PROPOSED PROJECT WILL MAINTAIN PEDESTRIAN AND VEHICULAR ACCESS TO THE EXISTING LOTS TO THE SOUTH OF THE PROPOSED DEVELOPMENT. IN ADDITION THE PROPOSED PROJECT WILL MAINTAIN UTILITY SERVICES TO/FROM THE EXISTING LOTS TO THE SOUTH OF THE PROJECT. PROVISIONS FOR SEWER, WATER, STORM, ELECTRICAL AND DATA/COMMUNICATION SERVICES HAVE BEEN PROVIDED.
2. A PG&E EASEMENT FOR ELECTRICAL TRANSMISSION LINE OVER AN UNKNOWN PORTION OF SUBJECT PROPERTY (BOOK 408 O.R. PAGE 205).
3. A PG&E EASEMENT FOR GAS PIPELINE OVER AN UNKNOWN PORTION OF SUBJECT PROPERTY (BOOK 559 O.R. PAGE 183).
4. AN UNDEFINED NON-EXCLUSIVE EASEMENT FOR ACCESS FOR PEDESTRIANS, VEHICLES, PARKING AND THE INSTALLATION, MAINTENANCE, REPAIR AND REPLACEMENT OF PAVEMENT, LANDSCAPING AND WIRES, PIPES AND CONDUITS RELATED TO STREET LIGHTING AND LOCAL AREA STORM DRAINS OVER AN UNKNOWN PORTION OF SUBJECT PROPERTY (INSTRUMENT NO. 87151217 AND 85137675).

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JUHSD PRECISE PLAN
TENTATIVE MAP
EXISTING MAPPING PLAN
SAN MATEO COUNTY CALIFORNIA
DALY CITY

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HESTERMAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
Scale: AS SHOWN
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Job No: 20180823

Drawing Number:
C2.1

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SHEET NOTES:

1. GRADING EXCEDDING 50 CUBIC YARDS SHALL REQUIRE APPROVAL OF PLANS AND A GRADING PERMIT. A LICENSED CIVIL ENGINEER SHALL PREPARE ANY GRADING PLANS AND EROSION CONTROL PLANS IN CONFORMANCE WITH A SOIL REPORT PREPARED BY A LICENSED SOIL ENGINEER OR GEOLOGIST IN COMPLIANCE WITH NPDES REQUIREMENTS PRIOR TO ANY DEVELOPMENT ON THE PROPERTY.
2. AN ENCROACHMENT PERMIT SHALL BE REQUIRED TO BE ISSUED BY THE PUBLIC WORKS DEPARTMENT FOR ALL WORK PROPOSED WITHIN THE PUBLIC RIGHT-OF-WAY.
3. FOLLOWNG NEW UTILITY INSTALLATION, THE APPLICANT SHALL REPLACE AREAS OF STREET PAVEMENT, SIDEWALK, CURB, AND GUTTER DAMAGED BY CONSTRUCTION. SUCH REPAIR SHALL BE PER CITY STANDARD SPECIFICATIONS.
4. ALL PROJECT IMPROVEMENTS SHALL BE ADA COMPLIANT.
5. THE APPLICANT SHALL COMPLY WITH THE APPLICABLE REQUIREMENTS OF THE CITY OF DALY CITY STANDARD DETAILS AND SPECIFICATIONS.
6. THE PROJECT'S ELECTRICAL TRANSFORMER SHALL NOT BE INSTALLED WITHIN THE PUBLIC RIGHT-OF-WAY.
7. ALL ELECTRICAL AND TELECOMMUNICATIONS SERVICES SHALL BE PROVIDED THROUGH UNDERGROUND CONNECTIONS. THERE SHALL BE NO OVERHEAD DROPS.
8. FULL TRASH CAPTURE DEVICE SHALL BE INSTALLED AND APPROVED BY CITY ENGINEER FOR ALL DRAINAGE SYSTEMS.

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JUHSD PRECISE PLAN
TENTATIVE MAP
CONCEPTUAL SITE PLAN

SAN MATEO COUNTY CALIFORNIA

DALY CITY

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HEFFERNAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
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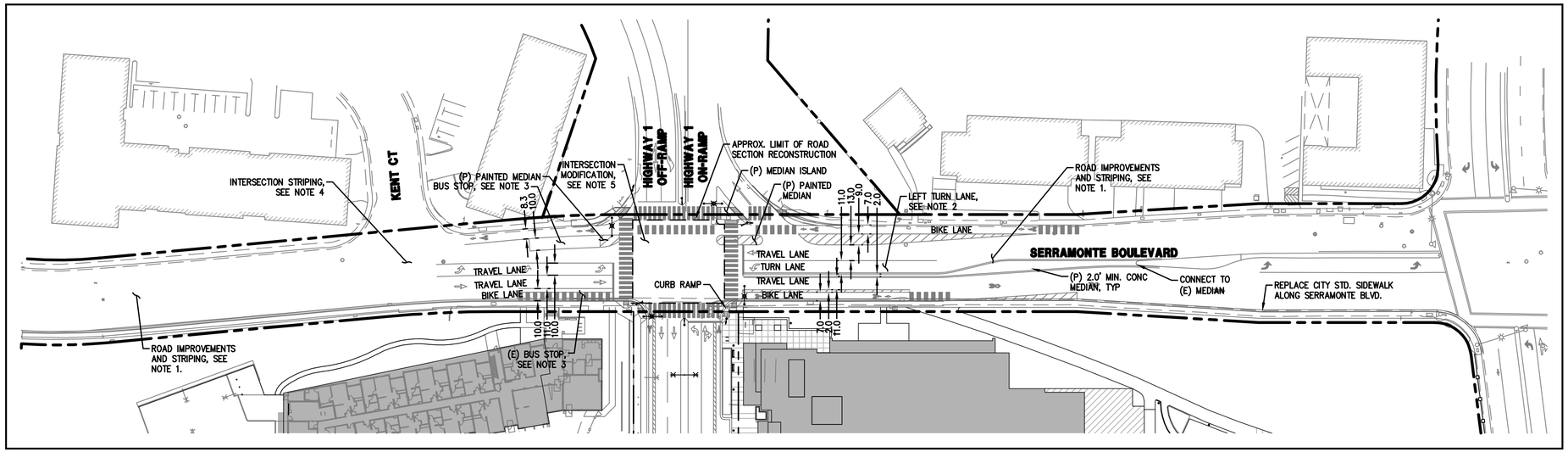
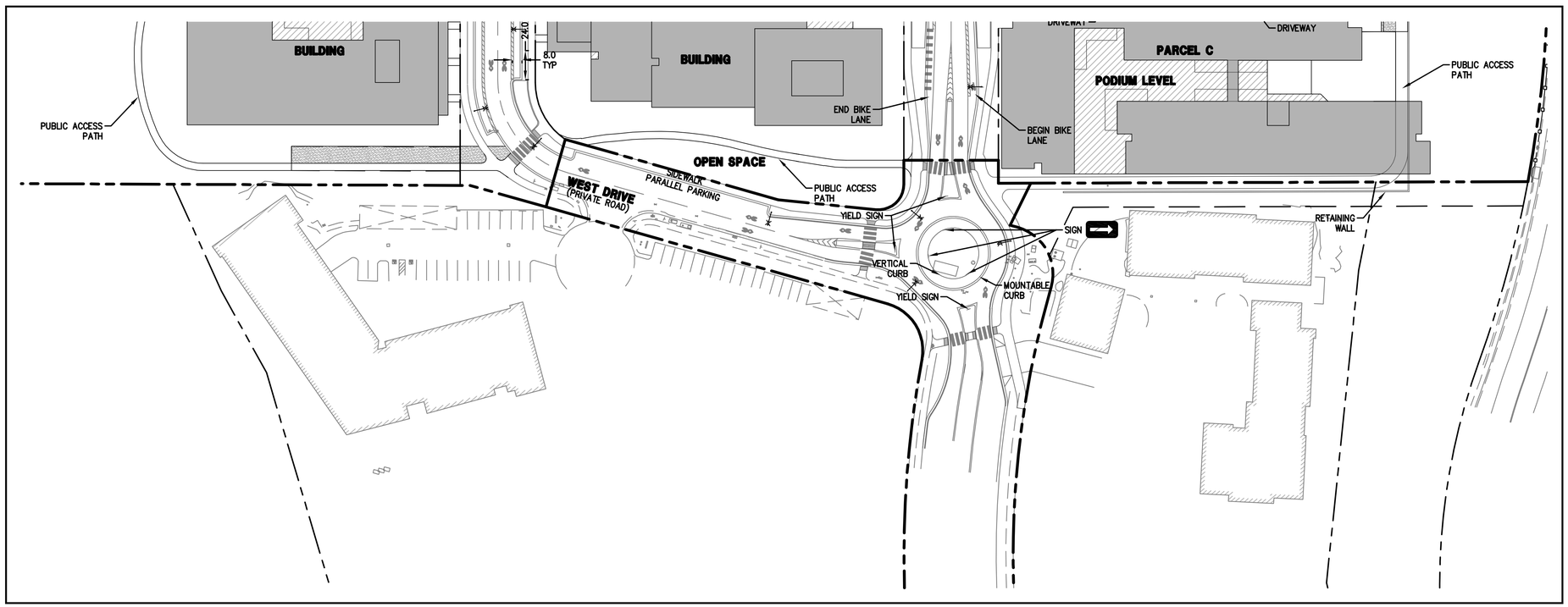


SERRAMONTE BOULEVARD



CAMPUS DRIVE

GRAPHIC SCALE
50 0 50 100

PROGRESS – PRINTED 08/25/23

SHEET NOTES:

1. ROADWAY IMPROVEMENTS SHOWN BASED ON CITY OF DALY CITY BIKE/PED MASTER PLAN PREPARED BY PARISI WITH SUGGESTED EDITS BASED ON FEHR & PEERS RECOMMENDATIONS.
2. DEDICATED WESTBOUND SERRAMONTE BLVD. LEFT TURN LANE INTO PROPOSED DEVELOPMENT.
3. EXISTING BUS STOPS/SHELTERS (WEST BOUND AND EASTBOUND) AT INTERSECTION TO REMAIN.
4. INTERSECTION STRIPING REVISED. WESTBOUND LEFT TURN LANE NO LONGER REQUIRED BECAUSE OF CURRENT WORKFORCE HOUSING PROJECT.
5. MEDIAN ISLANDS ELIMINATED TO ACCOMMODATE BUS STOPS AND LANE CONFIGURATIONS.

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JUHSD PRECISE PLAN
TENTATIVE MAP
CONCEPTUAL SITE PLAN

DALY CITY SAN MATEO COUNTY CALIFORNIA

REGISTERED PROFESSIONAL ENGINEER
TIMOTHY P. HESTERMAN
No. 67089
Exp. 9/30/24
CIVIL
STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
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Design: TH
Drawn: MP
Approved: TH
Job No: 20190823

Drawing Number:
C3.1

DRAWING NAME: K:\2019\190823_Jefferson_UHSD\ENG\SHEETS\PP-TM\Civ-PP-TM-03.dwg (01)
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SHEET NOTES:

1. PROPOSED PEDESTRIAN ACCESS, PUBLIC ACCESS, INGRESS/EGRESS, AND PRIVATE UTILITY EASEMENTS ARE NON-EXCLUSIVE EASEMENTS. NON-EXCLUSIVE EASEMENTS MAY BE MODIFIED AND OR TERMINATED UNDER CERTAIN CONDITIONS. CONDITIONS MAY INCLUDE, BUT ARE NOT LIMITED TO, CHANGE IN DEVELOPMENT PLANS AND EASEMENTS BECOMING OBSOLETE.
2. PROPOSED WATER AND SEWER EASEMENTS FOR DISTRIBUTION AND COLLECTION SHALL BE GRANTED TO THE CITY FOR THE UTILITY MAINS TO BE OWNED AND MAINTAINED BY THE CITY.

SERRAMONTE BOULEVARD
(P) PRIVATE STORM DRAIN EASEMENT
10.00'
10.00'
15.00'
(P) PEDESTRIAN ACCESS EASEMENT
(P) SEWER EASEMENT
(P) WATER EASEMENT
APPROXIMATE LIMIT OF BLDG. FOOTPRINT
PARCEL A (AREA) (160,344 SF) (3.68 ACRES)
EXISTING APARTMENTS
EXIST BLDG TO REMAIN
PARCEL 1 (AREA) (19,327 SF) (0.44 ACRES)
ENTRY DRIVE
PODIUM LEVEL
BUILDING
PARCEL B (AREA) (188,680 SF) (4.33 ACRES)
PEDESTRIAN PATH
(P) INGRESS/EGRESS EASEMENT
42.50'
25.00'
(P) EVAE
37.00'
33.00'
(P) SEWER EASEMENT
10.00'
(P) LOT LINE (TYP)
WEST ACCESS WAY
NORTH DRIVE
PARCEL 2 (AREA) (36,716 SF) (0.84 ACRES)
(P) WATER EASEMENT
NORTH ACCESS WAY
131.75'
40.00'
(P) INGRESS/EGRESS EASEMENT
(P) PEDESTRIAN ACCESS EASEMENT
20.00'
PARCEL D (AREA) (128,084 SF) (2.94 ACRES)
CALLAN BOULEVARD
PARCEL F (AREA) (167,095 SF) (3.84 ACRES)
WEST DRIVE
EAST DRIVE
62.00'
PARCEL 5 (AREA) (27,066 SF) (0.62 ACRES)
PARCEL E (AREA) (130,344 SF) (2.99 ACRES)
PARCEL 4 (AREA) (17,039 SF) (0.39 ACRES)
32.00'
13.00'
SOUTH ACCESS WAY
74.00'
43.00'
PARCEL 3 (AREA) (11,729 SF) (0.27 ACRES)
PARCEL C (AREA) (44,591 SF) (1.02 ACRES)
6.00'
(P) PEDESTRIAN ACCESS EASEMENT
139.00'
(P) SEWER EASEMENT
(P) WATER EASEMENT
10.67'
(P) EVAE
20.00'
WEST DRIVE - LOT 3 [115 M 35-36]
38.00'
(E) LOT LINE TO BE RELOCATED
LOT 4 [115 M 35-36]
(E) UTILITY EASEMENT TO BE REPLACED
LOT 1 [115 M 35-36]
LOT 2A [115 M 35-36]
GRAPHIC SCALE
50 0 50 100

PROGRESS - PRINTED 08/25/23

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JUHSD PRELIMINARY PRECISE PLAN
TENTATIVE MAP
PROPOSED MAPPING PLAN

SAN MATEO COUNTY CALIFORNIA
DALY CITY

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HEFFERNAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
Scale: AS SHOWN
Design: TH
Drawn: MP
Approved: TH
Job No: 20180823

Drawing Number:
C3.2

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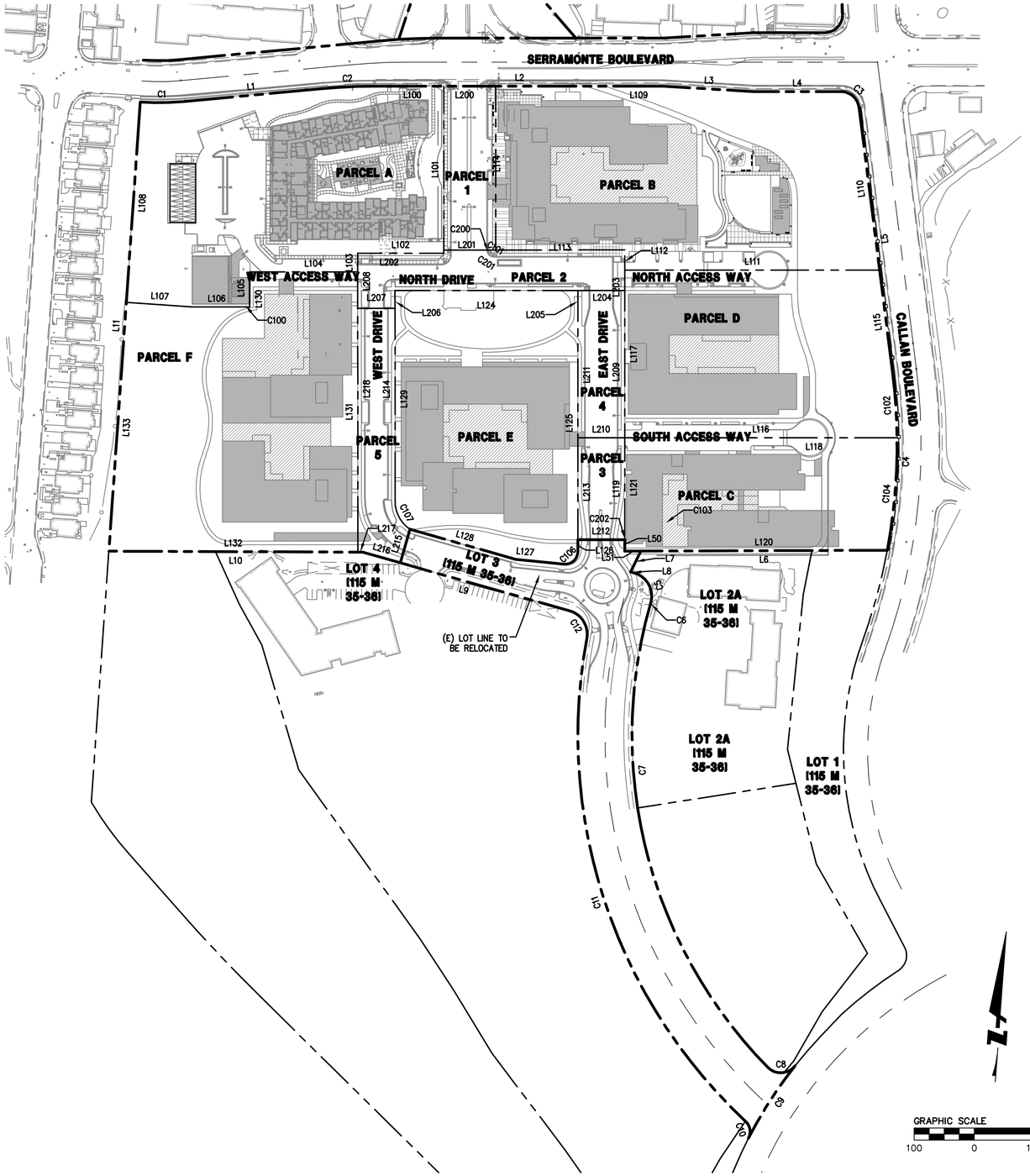

SITE BOUNDARY

LINE TABLE		
LINE NO.	LENGTH	DIRECTION
L1	229.03	S80°30'00"W
L2	478.38	S85°50'00"W
L3	150.28	S89°16'00"W
L4	145.45	S85°50'00"W
L5	443.75	N11°23'04"W
L6	410.07	N85°39'19"E
L7	38.61	N21°53'34"E
L8	6.47	S78°19'48"E
L9	357.86	S78°19'48"E
L10	422.23	N86°03'31"E
L11	749.28	S00°10'00"E

CURVE TABLE			
CURVE NO.	LENGTH	RADIUS	DELTA
C1	70.86	435.00	009°19'59"
C2	93.08	1000.00	005°20'00"
C3	43.34	30.00	082°46'56"
C4	298.25	960.00	017°48'01"
C5	62.83	40.00	090°00'00"
C6	5.00	1411.46	000°12'11"
C7	831.24	789.99	060°17'14"
C8	50.86	30.00	097°08'10"
C9	143.07	719.00	011°24'04"
C10	30.96	24.00	073°55'07"
C11	882.24	880.00	057°26'29"
C12	59.13	40.00	084°41'56"

NUMBERED LOTS

LINE TABLE		
LINE NO.	LENGTH	DIRECTION
L50	18.93	S04°10'22"E
L51	26.61	S85°39'19"W

LETTERED PARCELS

LINE TABLE		
LINE NO.	LENGTH	DIRECTION
L100	112.92	S85°50'00"W
L101	278.09	N04°10'22"W
L102	143.05	N85°49'38"E
L103	31.00	N04°10'22"W
L104	179.80	N85°49'38"E
L105	52.69	N04°10'22"W
L106	81.35	N85°49'38"E
L107	110.13	N89°50'00"E
L108	334.24	S00°10'00"E
L109	295.96	S85°50'00"W
L110	272.95	N11°23'04"W
L111	423.99	N85°49'38"E
L112	23.50	S04°10'22"E
L113	217.95	N85°49'38"E
L114	273.08	S04°10'22"E
L115	170.80	N11°23'04"W
L116	452.97	N85°49'38"E

LINE TABLE		
LINE NO.	LENGTH	DIRECTION
L117	279.17	S04°10'22"E
L118	452.97	S85°49'38"W
L119	169.58	N04°10'22"W
L120	410.07	N85°39'19"E
L121	166.06	S04°10'21"E
L124	304.00	S85°49'38"W
L125	388.75	N04°10'22"W
L126	19.82	N04°10'22"W
L127	81.62	S88°21'59"E
L128	182.63	S78°19'48"E
L129	340.45	S04°10'22"E
L130	15.69	S04°10'22"E
L131	466.41	N04°10'22"W
L132	413.99	N86°03'31"E
L133	415.04	S00°10'00"E

NUMBERED PARCELS

LINE TABLE		
LINE NO.	LENGTH	DIRECTION
L200	69.50	S85°50'00"W
L201	74.92	N85°49'38"E
L202	212.69	S85°49'38"W
L203	63.00	N04°10'22"W
L204	74.00	N85°49'38"E
L205	16.00	S04°10'22"E
L206	16.00	N04°10'22"W
L207	62.00	N85°49'38"E
L208	57.00	S04°10'22"E
L209	219.17	N04°10'22"W
L210	78.00	N85°49'38"E
L211	230.25	S04°10'22"E
L212	78.00	N85°49'38"E
L213	158.50	S04°10'22"E
L214	324.45	S04°10'22"E
L215	58.00	S11°40'12"W
L216	65.10	N78°19'48"W
L217	8.24	S86°03'31"W
L218	409.41	N04°10'22"W

CURVE TABLE			
CURVE NO.	LENGTH	RADIUS	DELTA
C100	15.11	116.44	007°26'12"
C101	9.66	9.50	058°14'35"
C102	110.04	960.00	006°34'03"
C103	19.11	101.04	010°50'22"
C104	188.21	960.00	011°13'58"
C106	34.40	21.02	093°46'32"
C107	55.20	57.00	055°29'08"

CURVE TABLE			
CURVE NO.	LENGTH	RADIUS	DELTA
C200	5.27	9.50	031°45'25"
C201	9.66	9.50	058°14'35"
C202	3.52	99.97	002°01'10"

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JUHSD PRECISE PLAN
TENTATIVE MAP
PROPOSED MAPPING PLAN

SAN MATEO COUNTY CALIFORNIA

DALY CITY

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HEFFERNAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
Scale: AS SHOWN
Design: TH
Drawn: MP
Approved: TH
Job No: 20180823

Drawing Number:
C3.3

PROGRESS - PRINTED 08/25/23

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NOTES:
FULL TRASH CAPTURE DEVICES SHALL BE PROVIDED ON THE DRAINGAE SYSTEM. TRASH CAPTURE DEVICES SHALL BE APPROVED BY THE CITY ENGINEER.

SERRAMONTE BOULEVARD (PUBLIC R.O.W)
REPLACE CITY STD. SIDEWALK ALONG SERRAMONTE BLVD.
(E) R.O.W.
CONNECT TO EXISTING STORM DRAIN
PAV 472.00
RET. WALL
PAV 469.70
BW 481.58
BW 482.52
BW 476.08
BW 464.00
FS 469.10
TC 482.71
PAV 482.21
482.98
FS 483.00
LG
TH 482.98
TC 482.59
PAV 482.09
TC 482.68
PAV 482.18
HP
TC 482.79
PAV 482.29
FF 483.00
TC 482.62
PAV 482.12
TC 482.51
PAV 482.01
HP
TC 482.82
PAV 482.32
FG 471.00
FS 471.00
FS 470.83
FS 471.00
FS 470.90
FS 471.50
CONNECT TO EXISTING STORM DRAIN
CONC MEMAN. TYP
APPROXIMATE LIMIT OF BLDG. FOOTPRINT
PARCEL A
EXISTING BUILDING UNDER CONSTRUCTION
PARCEL B
PODIUM LEVEL
BUILDING
FF 482.00
STORMWATER DIVERSION STRUCTURE
STORM DRAIN STUB
STORMWATER RETENTION SYSTEM
STORMWATER DIVERSION STRUCTURE
OPEN SPACE
EAST HILLSIDE
ENTRY DRIVE (PRIVATE ROAD)
TC 482.58
PAV 482.08
TC 481.54
PAV 481.04
TC 481.94
PAV 481.44
HP
TC 481.85
PAV 481.35
TC 481.31
PAV 480.81
TC 481.83
PAV 481.13
UP
TC 481.50
PAV 480.00
TC 481.73
PAV 481.22
PAV 481.00
CONNECT TO EXISTING STORM DRAIN
NORTH DRIVE (PRIVATE ROAD)
PAV 481.32
WEST ACCESS WAY
NORTH ACCESS WAY
TC 481.14
PAV 480.64
TC 480.00
PAV 479.50
TC 478.23
PAV 478.73
(P) PROPERTY LINE
WEST HILLSIDE
EXIST BLDG TO REMAIN
FS 488.00
CONNECT TO EXISTING STORM DRAIN
TC 481.99
PAV 481.49
CONNECT TO EXISTING STORM DRAIN
TC 481.68
PAV 481.18
TC 481.43
PAV 480.93
HP
TC 481.88
PAV 481.38
TC 481.40
PAV 480.90
PAV 481.31
STORM DRAIN STUB
TC 480.00
PAV 479.50
BUILDING
STORM DRAIN STUB
PODIUM LEVEL
EAST DRIVE (PRIVATE ROAD)
WEST DRIVE (PRIVATE ROAD)
PARCEL D
FF 483.50
PODIUM LEVEL
BUILDING
CALLAN BOULEVARD (PUBLIC R.O.W)
FS 467.00
PARCEL F
FF 484.00
STORM DRAIN STUB
STORM DRAIN STUB
STORM DRAIN STUB
BUILDING
TC 482.94
PAV 482.44
TW 484.55
FS 480.55
PEDESTRIAN PATH (TYP)
WEST HILLSIDE
FS 486.33
PODIUM LEVEL
TC 483.00
PAV 482.50
PARCEL E
PODIUM LEVEL
FF 484.50
BUILDING
SOUTH ACCESS WAY
1.2%
TC 483.78
PAV 483.28
TW 484.00
BW 468.00
TC 480.55
PAV 480.05
TW 485.00
BW 473.00
PAV 484.24
FF 486.00
PARCEL C
PODIUM LEVEL
EAST HILLSIDE
TC 484.08
PAV 483.58
PAV 483.84
FS 485.25
FS 484.50
PAV 484.91
PAV 487.94
FS 488.85
FS 480.00
TW 491.50
BW 487.50
TW 484.10
BW 473.00
WEST DRIVE (PRIVATE ROAD)
PAV 486.63
PAV 489.00

GRAPHIC SCALE
50 0 50 100

PROGRESS - PRINTED 08/25/23

DRAWING NAME: X:\2018\180823_Jefferson UHSD\ENG\SHEETS\PP-TM\Civ-PP-TM-04.dwg (Layout)
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JUHSD PRECISE PLAN
TENTATIVE MAP
CONCEPTUAL GRADING PLAN

SAN MATEO COUNTY CALIFORNIA
DALY CITY

REGISTERED PROFESSIONAL ENGINEER
TIMOTHY P. HEFFERNAN
No. 67089
Exp. 9/30/24
CIVIL
STATE OF CALIFORNIA

No.	Revisions

Date: 8-25-2023
Scale: AS SHOWN
Design: TH
Drawn: MP
Approved: TH
Job No: 20180823

Drawing Number:
C4.0

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NOTES:

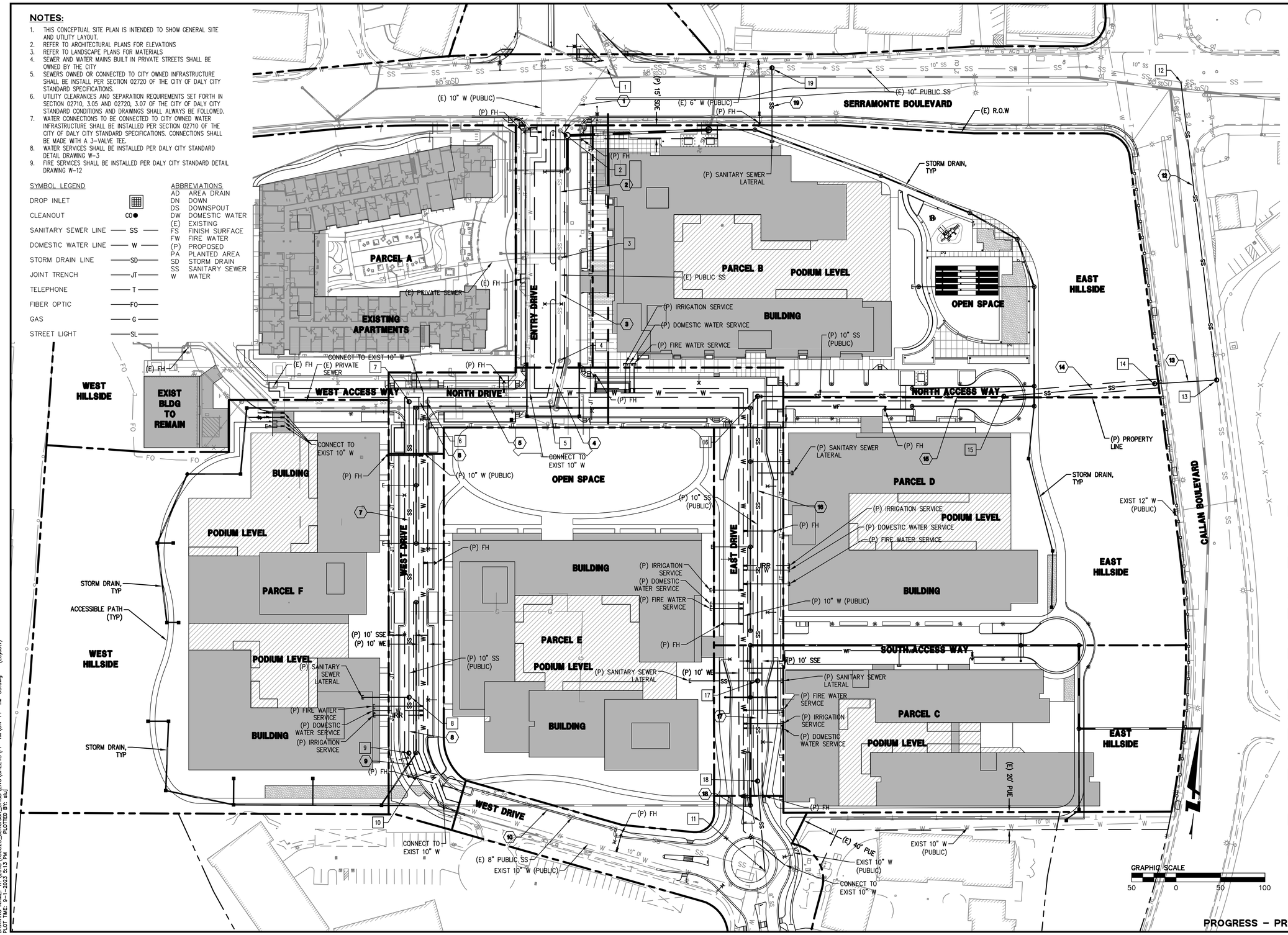
1. THIS CONCEPTUAL SITE PLAN IS INTENDED TO SHOW GENERAL SITE AND UTILITY LAYOUT.
2. REFER TO ARCHITECTURAL PLANS FOR ELEVATIONS
3. REFER TO LANDSCAPE PLANS FOR MATERIALS
4. SEWER AND WATER MAINS BUILT IN PRIVATE STREETS SHALL BE OWNED BY THE CITY
5. SEWERS OWNED OR CONNECTED TO CITY OWNED INFRASTRUCTURE SHALL BE INSTALL PER SECTION 02720 OF THE CITY OF DALY CITY STANDARD SPECIFICATIONS.
6. UTILITY CLEARANCES AND SEPARATION REQUIREMENTS SET FORTH IN SECTION 02710, 3.05 AND 02720, 3.07 OF THE CITY OF DALY CITY STANDARD CONDITIONS AND DRAWINGS SHALL ALWAYS BE FOLLOWED.
7. WATER CONNECTIONS TO BE CONNECTED TO CITY OWNED WATER INFRASTRUCTURE SHALL BE INSTALLED PER SECTION 02710 OF THE CITY OF DALY CITY STANDARD SPECIFICATIONS. CONNECTIONS SHALL BE MADE WITH A 3-VALVE TEE.
8. WATER SERVICES SHALL BE INSTALLED PER DALY CITY STANDARD DETAIL DRAWING W-3
9. FIRE SERVICES SHALL BE INSTALLED PER DALY CITY STANDARD DETAIL DRAWING W-12

SYMBOL LEGEND

- DROP INLET
- CLEANOUT
- SANITARY SEWER LINE — SS —
- DOMESTIC WATER LINE — W —
- STORM DRAIN LINE — SD —
- JOINT TRENCH — JT —
- TELEPHONE — T —
- FIBER OPTIC — FO —
- GAS — G —
- STREET LIGHT — SL —

ABBREVIATIONS

AD	AREA DRAIN
DN	DOWN
DS	DOWNSPOUT
DW	DOMESTIC WATER
(E)	EXISTING
FS	FINISH SURFACE
FW	FIRE WATER
(P)	PROPOSED
PA	PLANTED AREA
SD	STORM DRAIN
SS	SANITARY SEWER
W	WATER



SEWER LEGEND

1. (E) SSMH 01 RIM 481.0± INV 470.0±
1. (E) 88 LF 10" PVC S=0.004
2. (E) SSMH 02 RIM 483.15 INV 470.35
2. (E) 143 LF 10" PVC S=0.004
3. (E) SSMH 03 RIM 480.25 INV 470.92
3. (E) 115 LF 10" PVC S=0.004
4. (E) SSMH 04 RIM 480.89 INV 471.39
4. (E) 48 LF 10" PVC S=0.004
5. (E) SSMH 05 RIM 480.90 INV 471.58
5. (E) 13.7 LF 10" PVC S=0.004
6. (E) SSMH 06 RIM 480.89 INV 472.13
6. 21 LF 10" PVC S=0.004
7. SSMH 07 RIM 480.89 INV 472.05
7. 333 LF 10" PVC S=0.010
8. SSMH 08 RIM 481.56 INV 475.97
8. 58 LF 8" PVC S=0.010
9. SSMH 9 RIM 481.85 INV 476.65
9. 30 LF 10" PVC S=0.010
10. (E) SSMH 10 CONNECT TO (E) SSMH RIM 482.00 INV 477.00
10. (E) 405 LF 8" PVC S=0.005
11. (E) SSMH 11 CONNECT TO (E) SSMH RIM 489.0± INV 479.0±
12. (E) SSMH 12 CONNECT TO (E) SSMH RIM 415.5± INV 403.5±
12. 340 LF 10" PVC S=0.040
13. SSMH 13 CONNECT TO (E) SEWER RIM 423.0± INV 415.9±
13. 70 LF 10" PVC S=0.040
14. SSMH 14 RIM 425.00 INV 418.81
14. 170 LF 10" PVC S=0.306
15. SSMH 15 RIM 481.70 INV 470.95
15. 277 LF 10" PVC S=0.010
16. SSMH 16 RIM 480.90 INV 473.72
16. 332 LF 10" PVC S=0.010
17. SSMH 17 RIM 482.56 INV 477.04
17. 94 LF 10" PVC S=0.010
18. SSMH 18 RIM 483.10 INV 477.98
18. 101 LF 10" PVC S=0.010
19. SSMH 19 CONNECT TO (E) SEWER RIM 461.9± INV 452.5±
19. 99 LF 10" PVC S=0.02

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JUHSD PRECISE PLAN
TENTATIVE MAP
CONCEPTUAL UTILITY PLAN

SAN MATEO COUNTY CALIFORNIA
DALY CITY

REGISTERED PROFESSIONAL ENGINEER TIMOTHY P. HEFFERNAN No. 67089 Exp. 9/30/24 CIVIL STATE OF CALIFORNIA

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PROGRESS - PRINTED 08/25/23

DRAWING NAME: K:\2018\180823_Jefferson JUHSD\ENG\SHEETS\PP-TM\Civ-PP-TM-05.dwg (Layout)
PLOT TIME: 8-25-2023 3:13 PM PLOTTED BY: MP

DRAFT - PLANNED DEVELOPMENT STANDARDS
PLANNED DEVELOPMENT ZONE PD-31B
SERRAMONTE DEL REY PRECISE PLAN

The purpose and intent of these Planned Development Standards is to replace the oning regulations contained in Planned Development Zoning District PD-31 for that portion of Planned Development PD-31 identified in the Serramonte Del Rey Precise Plan (Attachment "A") and replace PD-31A in its entirety with revised regulations, which shall be known as Planned Development Zoning District PD-31B.

I. GENERAL

1. When these Planned Development standards conflict with other sections of the Zoning Ordinance, these standards shall prevail only to the extent of the conflict. Where these planned development standards do not provide regulations, the Zoning Ordinance[1] shall apply as to the most similar land use or standard.

2. The contents of the Serramonte Del Rey Precise Plan dated September 1, 2023 (Attachment "A") are hereby incorporated by reference. When these Planned Development standards conflict with Serramonte Del Rey Precise Plan, these standards shall prevail only to the extent of the conflict.

II. OBJECTIVE DEVELOPMENT STANDARDS

A. LAND USE

A.1 Permitted Uses

The following uses are permitted by right as part of Planned Development Zone PD-31:

1. RESIDENTIAL USES

   Accessory dwelling units as permitted by the California Government Code
   Apartment buildings meeting the density prescription contained herein
   Townhouses[2]

[1] The Zoning Ordinance provisions that apply shall be those consistent with the Development Agreement, including without limitation its covenants concerning vested rights and, notwithstanding anything provision herein, nothing in the PD-31 zoning is intended to supersede the Development Agreement.

[2] Three story walk-up apartment townhouses are permitted as part of a multi-family residential of at least four stories on any parcel. Up to 15 walk-up apartment townhouses are permitted on a single parcel, not to exceed a maximum number of 40 walk-up apartment townhouses for the plan area.

Live work dwelling units[3]

2. COMMERCIAL USES[4,5,6]

Athletic clubs and health studios
Assembly uses, including churches, lodges, and social and meeting halls
Business and trade schools
Childcare facilities, day care centers, and play gyms
Food sales on a temporary basis, including farmer's markets and food truck sales where such uses are conducted on hardscape surfaces and do not displace any existing parking space
Offices use including professional office, medical and dental office, and medical clinics
Veterinarian offices
Personal service uses, including nail and hair salons, massage businesses where employees are licensed by the State of California
Restaurants that do not provide a drive-through window
Retail uses, including retail sales of beer, wine, and distilled spirits. where less than 50 percent of the store stock retail value is such products
Seasonal temporary uses (e.g. Christmas store)

3. COMMUNITY SERVICE USES[4]

Community center
Library

4. PUBLIC UTILITY AND PUBLIC SERVICE USES[7]

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[3] Live-work units combine residential and non-residential uses. Live-work units require business owner occupancy of the unit and that no less than 50 percent of the floor area is workspace. Live-above is permitted, where residential living space is above the workspace, including a separation between the two uses, so that the commercial section can be independently leased out for limited use. Occupants of a live-work unit are required to maintain either a Daly City business license, or a Home Occupation Permit per City code requirements, and as permitted by San Mateo County, such as a microenterprise home kitchen operation. Live-work uses are not included in retail/commercial floor area limits.

[4] The uses prescribed in this list shall be permitted when proposed within a building containing residential uses that meet the density prescription identified in this ordinance. They shall not be permitted in freestanding buildings.

[5] Other commercial uses not listed here can be permitted at discretion of the Planning Manager.

[6] When a use is not specifically listed, it shall be assumed that when the unlisted use is similar to or less objectionable than a permitted use, such use shall be permitted in the district to the same requirements of the most similarly listed use. Otherwise, the use shall be presumed to be not allowed.

[7] The uses prescribed in this list shall be permitted when proposed on parcels containing residential uses that meet the density prescription identified in this ordinance. They shall not be permitted unless proposed in conjunction with residential buildings.

Pumping stations
Public utility buildings
Wireless communications facilities in accordance with the regulations specified in Chapter 17.39 of the Municipal Ordinance

A.2 Use Permits

The following uses are permitted with a Use Permit in PD 31 zone:

At the Community Garden at Overlook Park on Parcel B, a Use Permit is required to replace the Community Garden with park and open space uses, including active and passive recreation, landscaping and structures incidental to such use. The City shall issue a use permit if the applicant demonstrates substantial evidence the Community Garden is not being substantially utilized, is being misused by any members of the community, or has otherwise become infeasible to operate.

A.3 Prohibited Uses

The following uses are not permitted with a Use Permit in PD-31 zone:

1. RESIDENTIAL USES

Single-family attached or detached residential uses, and other similar uses, that do not meet the density prescription contained herein

2. COMMERCIAL USES

Retailers where more than 10 percent of the retail value of the store stock are firearms, such as handguns and long guns, in an open shopping format, or firearm parts, or any business that engages in the repair of firearms and/or firearm parts.

Retail sales where 50 percent or more of the store stock retail value is products that are beer, wine, and distilled spirits.

Retailer ales where 50 percent or more of the store stock retail value is products containing tobacco, electronic cigarettes, personal vaporizers, or electronic nicotine delivery systems
Vehicle or equipment rental and vehicle storage
Car wash and detailing shops
Manufacturing uses
Restaurants and any other uses providing a drive-through window
Service stations, including operational and physical expansions thereto.

A.4 Development Density

A.4.1 Residential

a. Maximum residential units permitted on each parcel are shown in Table 3.3 Permitted Residential Density by Parcel. The sum of the total residential units developed on all parcels A-F shall not exceed 1,235 units. Any two of parcels D, E and F may be developed with high-rise buildings up to 14 stories up to parcel maximums. There is no maximum residential density in dwelling units/acre.

b. Minimum residential density for any parcel shall be 45 dwelling units/acre and minimum density for the Precise Plan area overall shall be no less than 60 dwelling units per acre.

c. Minimum lot size shall be 10,000 square feet, Minimum lot width shall be 25 feet.

d. For the purpose of calculating minimum residential density, land area shall include the building and covered parking area of a parcel not including park, open space, private streets, private accessways, paths and trails, setbacks and hillsides with slopes greater than three percent.

A.4.2 Commercial

a. Parcels may provide retail/commercial square footage on the ground floor up to the maximum in Table 3.3, however the total retail/commercial square footage for the overall buildout of the Plan Area is limited to 14,000 sq.ft.

Table 3.3 Permitted Density by Parcel

PARCEL NUMBER	MAXIMUM RESIDENTIAL UNITS	MAXIMUM RETAIL - COMMERCIAL SQUARE FOOTAGE	MINIMUM RESIDENTIAL DENSITY OR UNITS
Parcel A	122	0	122
Parcel B	210	6,000 sq.ft.	45 DU/AC per parcel 60 DU/AC per plan area
Parcel C	152	8,000 sq.ft.*	45 DU/AC per parcel 60 DU/AC per plan area
Parcel D	270	8,000 sq.ft.	45 DU/AC per parcel 60 DU/AC per plan area

Parcel E	330	8,000 sq.ft.	45 DU/AC per parcel 60 DU/AC per plan area
Parcel F	400	8,000 sq.ft.	45 DU/AC per parcel 60 DU/AC per plan area

*Parcel C is permitted to build up to 2,800 sq. ft of daycare center facilities within its allotment of retail/commercial square footage.

A.5 Building Height

Permitted building height for the Plan Area is shown in Figure 3.3 Building Heights. For Parcels A, B, C, D, E and F, the height limit for a podium shall be 90 feet, and for Parcels D, E and F the height limit for a tower shall be 150 feet. Buildings can be any height up to these limits, provided the project meets the minimum density standard set forth herein. Townhouses shall be constructed with a minimum three-story building height. Multi-family building shall be constructed with a predominant building height of a fourstory minimum.. Stepbacks are required at 65 feet in height, with locations as shown on Figure 3.3 Building Heights. Exceptions to the height limit are:

A.5.1 Ornamental architectural features, such as turrets, parapets, corner towers, or other accentuating features.

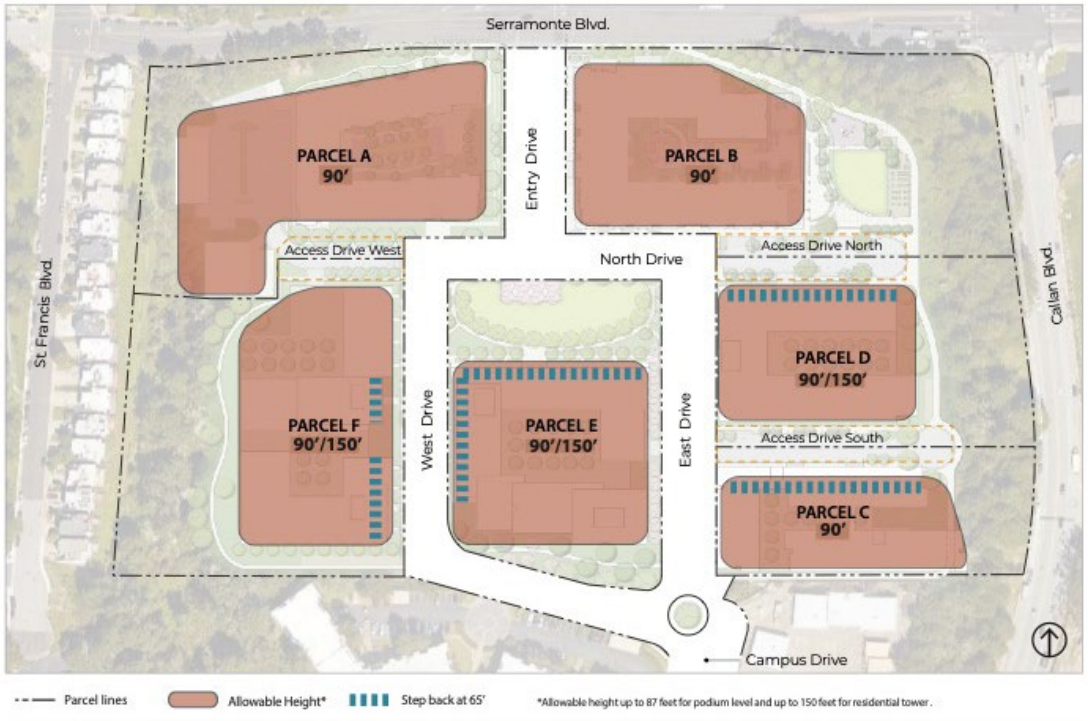
A.5.2 Mechanical and roof-mounted elevator core equipment up to a maximum of 18 feet above maximum height, provided their combined coverage does not exceed 30% of building roof area. Equipment less than four feet above maximum height is exempt from the coverage calculation.

A.5.3 Architectural and landscape screening designed to conceal mechanical and roof mounted equipment.

A.5.4 Sustainability elements, such as photovoltaic cells, small-scale wind turbines suitable for residential development, storm water catchment / treatment equipment, solar water heating equipment.

A.5.5 Enclosed amenity spaces to a height of 12 feet where roof is designed as an accessible outdoor common area if coverage of enclosed amenity space is no more than 30 percent of building roof area.

Figure 3.3 Building Heights



A.6 Street Frontage

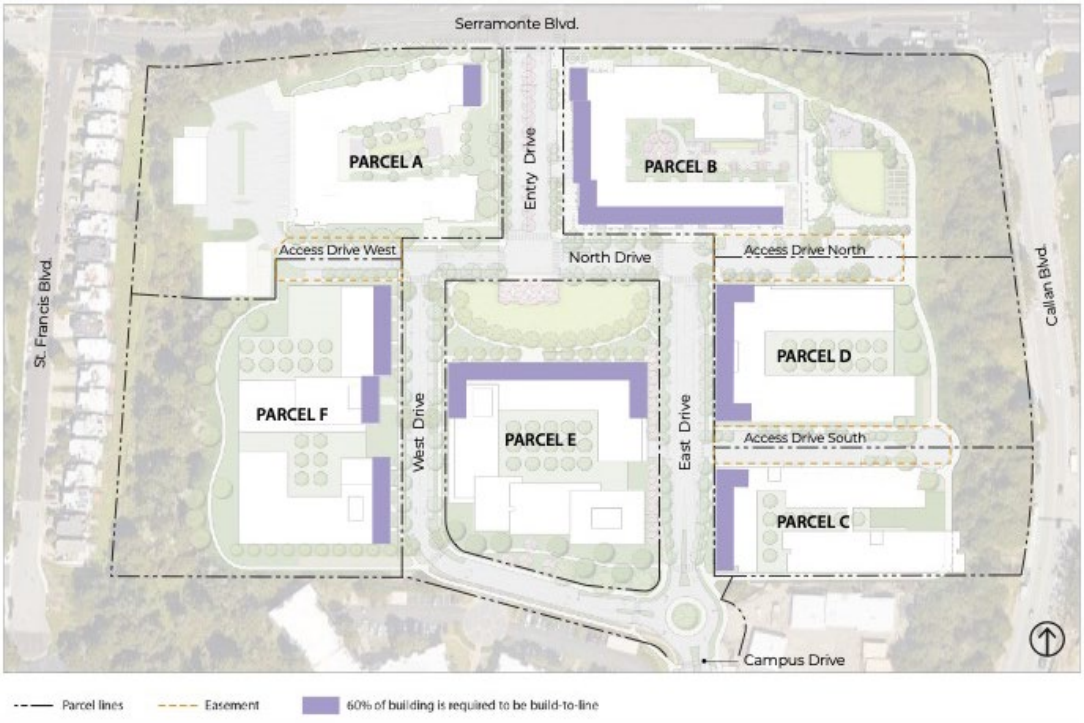
The Precise Plan utilizes build-to lines to define urban street and park frontages for buildings. Figure 3.4 Street Frontages indicates the location and percentage of building walls required to be located at a build-to line. A build-to line sets the location of the primary building wall. Table 3.4 Location of Build-to Line for Parcels specifies the distance in feet of the build-to line from a parcel boundary. Together, these standards set the location and street wall for buildings throughout the neighborhood.

Table 3.4: Location of Build-to-Line for Parcels

PARCEL	FRONTAGE	BUILD-TO LINE
Parcel A	Entry Drive Access Drive West	N/A N/A
Parcel B	Entry Drive North Drive/Access Drive North	Varies from 7.5 feet to 28 feet from north to south 43 feet
Parcel C	East Drive Access Drive South	2 feet 25 feet 9 inches
Parcel D	East Drive Access Drive North Access Drive South	6 feet 40 feet 40 feet

Parcel E	East Drive West Drive West Drive (southside) Central Green	14 feet 10 feet 15 feet (setback measured from Public Access Easement) 10 feet (setback measured from Public Access Easement)
Parcel F	West Drive Access Drive West	10 feet 40 feet

Figure 3.4 Street Frontage



Building frontage standards are:

A.6.1 The building frontage on all parcels shall comply with the percentage of building that is required to be aligned along the build-to-line, as shown in Figure 3.4.

A.6.2 The primary wall of a building shall align with the build-to line. The primary wall can be located up to 6 feet from a build-to-line. Ground floor building frontages may be recessed from the build-to line.

A.6.3 Balconies and other projections above 16’ from ground level may encroach across the build-to line up to 6 feet, provided such projections meeting Building and Fire Codes, and do not interfere with underground infrastructure.

A.6.4 Building entry canopies, arcades, and galleries are permitted to encroach up to 15 feet across the build-to-line.

A.6.5 Stairs to podium level courtyards overlooking parks, stoops, and appropriate fencing can encroach up to 10’ on the park side of a build-to line.

A.7 Ground Floor Use

The distribution of ground floor uses is essential to creating an active pedestrian environment. Figure 3.5 Ground Floor Use identifies the location, type and orientation of ground floor uses by parcel for the Plan Area. Five types of ground floor uses are defined as follows:

A.7.1 **Mixed- Use**. This requires a ground floor use of one or more of: retail, café, restaurant uses with outdoor dining, building entries, residential lobbies, commercial, or community uses that attract pedestrian activity with physical access and visibility to and from the adjacent sidewalk.

A.7.2 **Active Residential Use**. Ground floors shall have one or more of the following: commercial or community uses; main building entry, residential lobby, residential amenity spaces, and individual ground floor residential unit entrances. Ground floor residential unit entrances shall be accessible units at grade or elevated ground floor units with transitional space such as a stoop or porch not greater than five feet in height above grade.

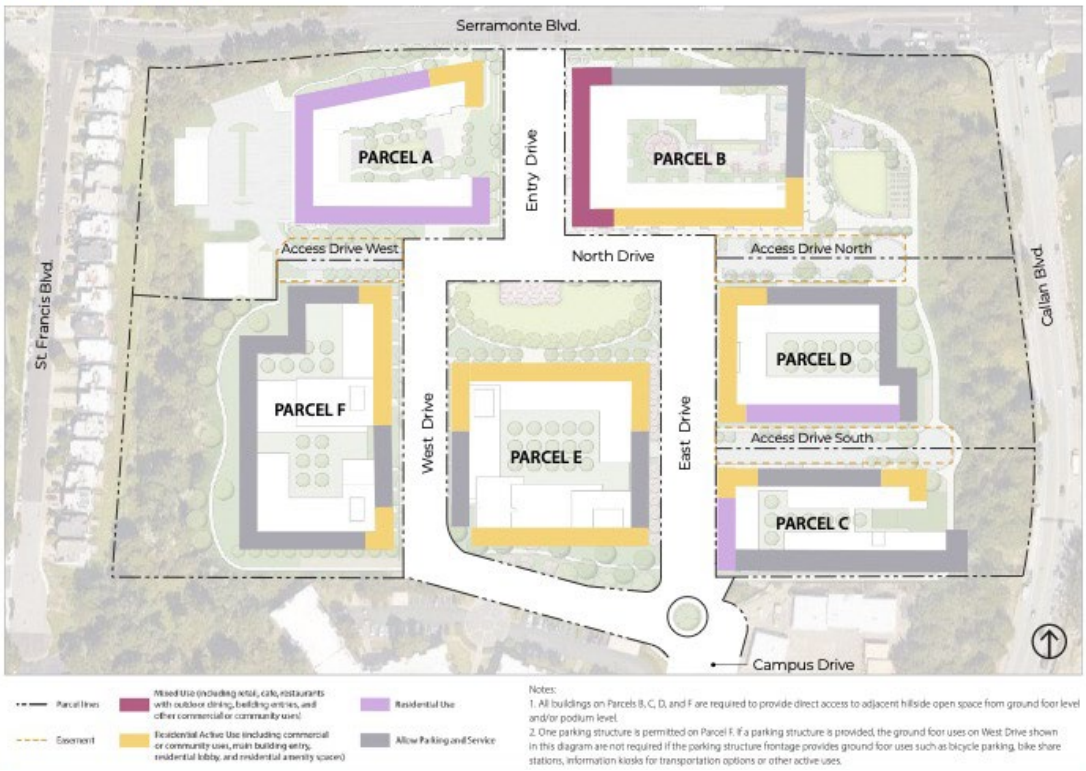
A.7.3 **Residential Use**. This requires ground floor residential use, such as residential units without individual unit entries accessible from the street (which can have a back porch, garden, or patio), or other residential use, and excludes parking, loading and services areas.

A.7.4 **Parking, Loading and Service Use**. The location for parking, loading and service uses fronting streets, yards and accessways.

A.7.5 **Required Street Frontages**. Where Mixed-Use, Active Residential Use, and Residential Use frontages are required:

- No more than one 24’ wide vehicle access driveway or two 12’ wide vehicle access driveways are permitted. Loading docks are not permitted at active ground floor use frontages.
- Blank walls are limited to a length of 30’ maximum. Walls opening to structured parking areas at the ground floor are limited to 60’ maximum.

Figure 3.5 Ground Floor Use



A.8 Setbacks

The perimeter of the Plan Area shall have the following setbacks along neighboring properties or street right-of-way. These are minimum setback dimensions. For build-to lines, see Table 3.4.

Table 3.5: Setbacks

LOCATION	SETBACK
North Perimeter Property Line	20 feet from Serramonte Boulevard
East Perimeter Property Line	75 feet from Callan Boulevard

South Perimeter Property Line	Parcel C: 7.5 feet Parcel E: 10 feet from pedestrian public access easement Parcel F: 40 feet
West Perimeter Property Line	30 feet
Within a parcel	Minimum separation between buildings shall comply with local and state building codes.
Side yard	6 feet up to 90 feet in height, 10 feet above 90 feet in height.

B. ARCHITECTURAL DESIGN

Buildings conforming to the architectural design standards will visually and functionally fit and contribute to the pedestrian-oriented urban realm of the Plan Area. Architectural design standards define the architectural character, form and function of buildings including building massing, façade composition, architectural details, materials, color, and sustainability features.

B.1 Architectural Character

Architectural character is the appearance of a building created by its form, function, construction technology and visual features.

B.1.1 Buildings shall be of high quality, contemporary architectural design. Contemporary architectural design is 21st century design: it reflects current trends in architecture. Contemporary architectural design does not adhere to a particular style of set of standards; rather, it seeks to distinguish itself from the past by incorporating the latest innovations in building technology and design.

B.1.2 Buildings shall not directly reference historic architectural styles or use materials associated with specific periods or styles.

B.1.3 Building shall not use terracotta tile roofing, mansard roofs, asphalt roof tiles or shingles.

B.1.4 Ribbon windows and flat building facades shall not be permitted.

B.1.5 Auto-oriented ground floor building design, such as continuous, open to the street, at grade covered parking spaces and extended curb cuts, shall not be permitted.

Proportion

Proportion is the correspondence of the size of building elements to human scale, to each other and to the whole building, thus creating a balanced, harmonious composition of elements that achieve a visually coherent architectural aesthetic related to scale of human experience.

B.1.6 The size of the pedestrian, podium, and tower levels shall be in proportion to one another.

B.1.7 Visual discord due to the mixing of too many differently shaped and sized building elements, forms, colors, or textures, shall not be permitted.

B.1.8 Random, oversized building elements shall not be permitted.

B.2 Building Massing

Building massing is the three-dimensional configuration of a building's size and shape. Vertically organized massing standards for pedestrian, podium and skyline levels are:

Pedestrian Level

B.2.1 To create a pedestrian level setback for active uses with occupied floor above, pedestrian level façade setbacks from the build-to-line shall not exceed 10 feet.

B.2.2 Where Active Uses or Required Building Entry, Lobby or Residential Amenity Space uses are required, the minimum floor-to-floor height for the ground floor shall be no less than 14 feet where there is amenity space.

Podium Level

Podium level building massing shapes the spatial definition of the public realm. Building street walls up to 90 feet are considered the podium level.

B.2.3 The first one to three levels of all buildings shall be differentiated from the upper floors to provide a visual support for the floors above. They shall have high quality materials appropriate for a pedestrian environment.

B.2.4 Stepbacks are required as shown on Figure 3.3, Building Heights. Where required, stepbacks shall be no higher than 65 feet above grade with the building set back no less than six feet from the street wall.

Tower Level

The tower, or skyline level consists of all building levels above 90 feet from grade. The skyline level contributes to the visual identity of the Plan Area.

B.2.5 Tower massing shall extend to ground level to visually anchor the tower to the ground.

B.2.6 Towers extending to ground shall be set back 10 feet minimum from the build-to line.

B.2.7 Towers shall be oriented in an east-west direction to minimize impacts to views from residences along Saint Francis Boulevard.

B.2.8 Each tower shall not exceed a massing envelope of 240 feet long by 150 feet wide.

B.2.9 A minimum separation of 60 feet shall be provided between any two towers or portions of skyline level building massing.

B.2.10 Towers are not permitted adjacent to the central open space.

B.3 Façade Composition

Façade composition is the organization of horizontal massing of the overall shape of a building to be relation to human scale experience.

Façade Modulation

B.3.1 Long continuous facades that extend the length of a parcel or city block shall not be permitted. Buildings over 100 feet in width shall provide vertical breaks in building massing in the form of projections and recesses to reduce the overall scale of the building.

B.3.2 Occupiable projections, such as balconies or bay windows, are permitted to project up to six feet from building face above streets and open spaces above the pedestrian level, in accordance with the City's building and fire codes. The recess or projection shall be a minimum of 3 feet in depth..

B.3.3 The façade shall be divided into segments of 30 to 60 feet in width using one or more of the design approaches below:

- Vertical shifts
- Balconies or bay windows
- Corner expression
- Volumetric recesses (including balconies)
- Volumetric projections
- Change of Material: to achieve modulation by a change of material, the material change must occur for at least 20% of the façade and must change in plane at least 18 inches in depth from the facade.

Fenestration

Fenestration is the arrangement of the location, grouping and scale of windows and doors as part of the wall system that comprises the façade of a building.

B.3.4 Building fenestration shall incorporate recessed and/or projecting window bays, balconies, canopies, and architectural elements, contrasting surfaces, and/or a rhythm to the building's light and shadow.

B.3.5 Avoid featureless expanses of fenestration that eliminate a sense of human scale.

Blank Facades

A blank façade is a building wall without any windows or doors, and is a featureless expanse with no variation in plane in terms of horizontal and vertical projections, openings or change in materials.

B.3.6 Ground floor blank facades at building walls facing public spaces or streets greater than 50 feet are not be permitted.

B.3.7 At the ground floor, blank facades longer than 50 feet shall provide landscaping, public art or architectural relief with design interest to the satisfaction of the Planning Division.

Ground Floor Design

B.3.8 Transparent windows, storefronts, show windows, building entries, dwelling entries, and/or other active uses shall be placed along street and public open space frontages, as required in the Ground Floor Active Frontage standards.

B.3.9 Doors or sliding windows shall be used by ground-floor restaurants, eating and beverage services to enable outdoor dining along sidewalks and plazas.

Windows and Doors

The selection, design and proportion of windows and doors highly influence the appearance of a building.

Entries

B.4.1 Buildings shall have identifiable main entrances that are directly visible and accessible from public rights-of-way. An entry canopy, recessed building volume, a sculptural volume, change in scale or identifiable architectural treatments are acceptable features.

B.4.2 In mixed-use buildings, residential entries are to be differentiated from commercial entries.

B.4.3 Pedestrian seating and bicycle parking shall be located near building entrances.

Windows

B.4.4 Upper story windows shall provide architectural details, such as sills, or lintels, that recess or project from the facade.

B.4.5 Reflective glazing is not permitted.

B.4.6 Non-reflective coatings, low-emissivity glass, external shade devices and other elements shall be used.

Materials and Color

Materials and color play a powerful role in creating the visual experience of a building. For the exterior of buildings:

B.5.1 Building materials, colors and finishes shall be coordinated to create a visually harmonious color palette appropriate for a family-oriented residential neighborhood, consistent with contemporary building design.

B. 5.2 High quality building materials and architectural detailing, with a preference for natural materials at the ground level, shall be used where people directly experience buildings.

B.5.3 Changes in color, texture or materials shall be used to differentiate architectural elements and building massing.

B.5.4 Avoid monolithic use of color, where an entire building is one color or tone.

B.5.5 Avoid garish, or discordant use of color.

C. PARKING AND LOADING

C.1 Parking Ratios[8]

C.1.1 The following parking ratios are currently anticipated for Parcels B through F:

- The parking ratio for residential units is zero[9] to 1.5 spaces per dwelling unit[10].
- The Applicant may increase parking above the foregoing ratio if supported by a parking analysis prepared by a qualified traffic engineer. [11]

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8 The City finds that all parking standards that differ from the Daly City municipal code are designed and necessary to maintain the unity or livability of the Project.

9 Per AB-2097, cities can no longer impose minimum parking requirements on new developments within a half-mile of major public transit stops, for which the Serramonte Del Rey Neighborhood qualifies. The state legislation does not prevent property owners from building parking and JUHSD anticipates providing the appropriate amount of parking that balances the supply and demand generated for the proposed project, based upon JUHSD analysis. These regulations shall explicitly not require a maximum number of parking spaces for any use.

10This may vary, based on AB-2097, see C.1.3.

11 Parking ratios are based on current conditions and assumptions. The City and JUHSD acknowledge that future parking demand will be in considerable flux over the lifetime of the Development Agreement, and may increase or decrease significantly. The intent of this approach is to provide adequate parking within the Precise Plan area based on demand as determined by a parking analysis study provided at the Applicant's discretion that will be based on objective analysis by a qualified traffic engineer demonstrating reductions to parking impacts to on-street parking in the surrounding neighborhood.

- By way of example, at Parcel C, if the parking ratio for the affordable housing is 0.5 parking space per dwelling unit, such is permissible because it falls within the foregoing range of parking ratios. Development of Parcel C may provide parking at a parking ratio up to 1.5 spaces/unit, To the extent parking is provided, the parking ratio will be included in the documents submitted to the City for review and approval of Parcel C.

C.1.2 Parking for pick-up and drop-off for the Head Start Program at Parcel C may be accommodated by on-street parking marked by appropriate signage, with such signage reserving parking spaces for this use during the appropriate hours.

C.1.3 Overflow parking for Parcel A may be accommodated within the Plan Area with surface parking, on-street parking, or within future parking podiums or structures on Parcels B through F. To the extent that JUHSD demonstrates that overflow parking is not needed for a particular development, it will be eliminated as a requirement in the future.

C.1.4 Residential parking can be accommodated in mechanical puzzle lifts.

C.1.5 No more that 10% of residential parking can be tandem, and tandem spaces may only be assigned to users of the same dwelling unit. Tandem units may be designed as either front to rear spaces or mechanical puzzle lift spaces.

C.1.6 Parking Enforcement: JUHSD or a delegee will be responsible for enforcement of any parking rules on JUHSD property. If private parking restrictions for on-street parking are put in place, parking spaces available for public use will be designated to access publicly accessible parkland, trails, and open space during time periods of private parking restrictions.

C.1.7 One bicycle parking stall per unit shall be provided and accessible from street level, unless otherwise mandated by the building code. Bicycle parking, if in excess of one stall per unit, can be located anywhere on site.

C.2 Design of Off-Street Parking and Loading

C.2.1 Parking shall be located behind, within, or under buildings, or within separate structures. Surface parking areas are prohibited between any building and Entry Drive, North Drive, East Drive and West Drive street frontages.

C.2.2 Parking stall and drive aisle dimensions for each parcel may comply with either approach below, or a combination of both approaches:

- The current City standards for off-street parking (including the ratio of standard spaces to compact spaces) at the time of the Applicant's submittal for conformance review, and/or

- A “Uni-stall” standard size parking space which is based upon a stall dimension of 8’–6” x 18’–0”, unless constrained by a wall on one or both sides, in which case the minimum stall width will be 9’–0” minimum. The drive aisle shall maintain a minimum of 24’ clear.

C.2.3 For mixed-use projects, shared parking is encouraged to allow uses with different peak hours of operation to utilize off-street parking facilities of other buildings in the Precise Plan.

C.2.4 Loading docks and service areas shall be located at the rear of the development or inside parking structures for parcels deeper than 80 feet, separate from parking areas. For smaller parcels, loading docks and service areas must be located on the side street, wherever possible. Loading zones should not disrupt the flow of traffic within a given project area.

C.2.5 Loading docks shall be located on Access Drives North, South, and West. If this is not possible, loading docks may be provided on East, North or West Drive, if enclosed within a building.

C.3 Vehicle and Bicycle Access

C.3.1 Location of vehicular parking entrances shall be as follows:

- Parcel A shall be accessed from Access Drive West.
- Parcel B shall be accessed from Entry Drive or Access Drive North; or any combination of these.
- Parcel C shall be accessed from Access Drive South, or any combination of these.
- Parcel D shall be accessed from Access Drive North, Access Drive South; or both.
- Parcel E shall be accessed from East Drive or West Drive; or both.
- Parcel F shall be accessed from West Drive or Access Drive West; or both.

C.3.2 Vehicular entries shall be located a minimum of 100 feet from intersections and crosswalks except for driveways located along access ways.

C.3.3 Bicycle access shall be from street level, and not required through garage entrances. Bicycle storage for each building shall be accessible from ground level, as close to the driveway entry as practicable, and clearly signed. Bicycles in excess of one per unit can be stored anywhere on site.

C.4 Vehicle Access Design

C.4.1 Two-way vehicular entrances designed as a single driveway shall have a maximum width of 24’.

C.4.2 Where a driveway crosses a sidewalk, clearly demarcate the sidewalk across the entire width of the driveway by using colored paving or materials.

C.4.3 On-street parking may be provided in the form of parallel parking or angled parking.

C.5 Parking Structures

Parking for mixed-use and residential buildings can be in underground, partially above-ground, or above-ground garages.

C.5.1 Above-ground garages not screened by residential uses shall include façade treatments or screening.

C.5.2 Parking garages shall be lined with ground floor active uses or residential entries where indicated per street frontage requirements, and designed with building façades that screen structural elements of the garage where not required by street frontage requirements.

C.5.3 The design of entries to parking garages shall not be more prominent on the building façade than the primary pedestrian entry.

C.5.4 Above-ground parking garages shall be designed with human scale design elements that complement and do not contrast with buildings and public spaces of the Precise Plan.

C.5.5 Parcels B, C, D, E, and F may contain above-ground parking garages.

C.5.6 Parking structure lighting shall be designed to avoid direct glare towards adjacent residential buildings.

C.6 Bicycle Facilities

C.6.1 Bicycle parking should be near building entrances and bicycle routes for user convenience.

C.6.2 Bicycle parking shall accommodate a range of bicycle types, including standard bicycles, E-bikes, tandem bicycles, and trailers.

C.6.3 On-street bicycle parking shall be separated from automobile parking by use of a landscaped buffer or curb.

C.6.4 Off-street bicycle parking shall be in secure locations in each building in the Precise Plan area.

D. OPEN SPACE

Open Space Requirement

Projects within the Plan Area shall provide a minimum of 150 sq. ft. of open space per dwelling unit[12]. The requirement for open space is to be met parcel-by-parcel through a combination of the following:

- Publicly accessible private open space, which are public spaces, such as park, trails, and open space areas, which are publicly accessible to residents, visitors, and public. Such spaces may have limited hours of availability.
- Private open space such as balconies, patios, or other open spaces for the exclusive use of an individual unit.
- Common open space such as communal open spaces or recreational areas with access limited to tenants of a residential or mixed-use development. Examples include at grade open space or plazas, podium level courtyards, rooftop terraces, and similar areas that can provide communal amenities, such as swimming pools, play areas, and cabanas.

Allocation of open space can be off-site of the specific parcel and within the Plan Area, including the areas designated by easement, such as allocation to Overlook Park, Central Green, South Point Park and the Recreation Trail at parcels B, C and D.

The Recreation Trail, Overlook Park, Central Green, and South Point Park will be counted towards satisfaction of the Open Space requirements for individual parcels as designated by the JUHSD. The allotted Open Space will be assigned to a specific parcel at the time the parcel is submitted for conformance review.

The open space at the Retail Plaza at Entry Drive is allocated to Parcel B exclusively.

Land that does not meet the City's gradient criteria for usable space (e.g., excessive slopes in the Hillside Area) will not be counted toward satisfaction of open space required for any parcel.

D.1 Common Open Space

D.1.1 Buildings shall provide spatial enclosure for common open spaces to create privacy, limit views from streets, and wind protection.

D.1.2 Common open space shall be visible and accessible to and from building amenity areas.

[12]Per Daly City zoning code section 17.38.020 requirement for 150 sq. ft. of usable open space.

D.2 Private Open Space

D.2.1 Private open spaces shall be directly accessible from the unit and large enough to permit outdoor activities with a minimum of five feet width and depth.

D.2.2 Private open space shall be constructed with high quality durable materials.

D.2.3 Fencing or screening between ground floor private open spaces shall permit visibility in and out of the open space for the top 18 inches.

E. LANDSCAPE DESIGN

E.1 Hillside Woodlands

To care for the hillside wooded areas to reduce fire hazards, enhance existing vegetation and promote urban forestry, the Precise Plan requires:

E.1.1 A tree succession operations plan for aging mature trees prepared by a qualified arborist will guide the replacement of existing trees over time due to age or fire vulnerability.

E.1.2 Removed trees shall be replaced with a diverse plant ecology governed by the area's unique coastal/Mediterranean climate including evergreen and deciduous species as recommended by an arborist.

E.1.3 The project's wooded hillside perimeter to the west and east shall be cleaned of surface and ladder fuels. Replacement trees shall include evergreen and deciduous species as described in the Project Tree List.

E.2 Planting

E.2.1 Plant material shall be comprised of at least 75% drought tolerant plant species. Planting plans shall comply with Daly City's Water Conservation in Landscaping regulations and the Water Use Classification of Landscape Species (WUCOLS).

E.2.2 Where turf grass is used, low water use hybrids and/ or no mow varieties shall be used. A variety of shrubs and ground covers should be used to create layering around building foundations, keeping shrubs at or below windowsills. Plant selections should be such that sightlines remain open and clear, and places of concealment are not fostered. Plants should be used to screen above-ground utilities. Along streets and sidewalks, plants shall be used in planters within the right of way to create spatial separation between sidewalk and vehicular traffic.

E.2.3 Pollinator plants that attract native birds and insects should be used strategically in locations well-suited to attract and sustain native populations. Use of fruiting plant

material should occur away from hardscape areas to prevent staining of pavements and to minimize maintenance.

E.3 Planters

E.3.1 Landscape planters within any private street shall be a minimum of four feet wide.

E.3.2 Tree wells shall be 4'x 4' minimum. Tree grates shall be cast iron with a baked oil finish in plaza areas and be an ADA accessible design consistent with the neighborhood.

E.3.3 Where landscape planting is provided under trees, planters shall be 4' W x 6' L minimum.

E.3.4 Planted medians shall provide at least a five feet wide planting area in addition to a minimum 12 inches wide maintenance band at the back of curb consisting of concrete, pavers, or fixed cobbles.

E.4 Site Irrigation

E.4.1 Site Irrigation systems shall comply with all local and state requirements as of time of project approval, and shall meet the City's water efficiency regulations.

E.4.2 All irrigation equipment shall be controlled with weather-based controllers located in easily accessible, locked stainless steel pedestal boxes. The equipment shall include flow sensors and automatic shut off valve capability with a wi-fi based alarm system to alert maintenance controller team(s).

E.4.3 Irrigation systems shall provide quick couplers or hose bibbs in lockable wall boxes in all common use areas.

E.5 Soil & Drainage

E.5.1 On-grade planting areas shall be comprised of amended topsoil import or amended native soil as required, based on a soil analysis report and soil laboratory recommendations. Excavation, clearing and grubbing, or soil preparation shall occur within established tree protection zones as per the advice of a landscape architect or arborist.

E.5.2 Planting areas shall by dressed with a 3-inch layer of mulch.

E.5.3 Cast iron or similar drain grates shall be used in turf and pedestrian circulation areas. Landscape planters shall be drained with cast iron, decorative metal, plastic or similar flat or atrium-style grates and factory-fabricated bodies.

E.6 Site Furnishings

E.6.1 Site furnishings shall be comprised of materials designed to withstand outdoor conditions.

E.6.2 Short term bicycle parking shall be dispersed throughout the Plan Area, as required to meet project requirements, city standards, and bicycle parking standards. Bicycle racks shall be galvanized, vinyl covered, or stainless steel, and meet all City requirements. In ground- or surface-mounted attachment is acceptable.

E.6.3 Seating shall be provided at retail, parks, open spaces, adjacent to the trails, and in front of primary building lobbies. Benches shall be made of metal and/or wood. Where wood is used, it should be thermally modified, or a suitable hardwood built to withstand weather and heavy public usage.

E.6.4 Café tables with chairs shall be movable with a variety of sizes for public use in gathering spaces and shall be constructed of materials suitable for outdoor public usage.

E.6.5 At least one drinking fountain shall be provided at each of the following: Overlook Park, Central Green, and the Recreation Trail. Dog bowl and water bottle filling attachments are recommended but not required.

E.6.6 Within Overlook Park, Applicant shall provide play equipment for children ages two through twelve. Play areas will be designated for children between the ages of two to five and for ages five to twelve years old.

Any community garden shall provide raised beds and a regular water service connection with water spigot at 100-foot intervals.

E.7 Trees

E.7.1 Trees within the street right of way, in plazas, and high-visibility open space areas shall be provided in 24-inch box size or larger and be secured with at least three tree stakes or below-grade root ball guying systems appropriate for the windy conditions found in Daly City. Above-ground cabling guying shall not be used in public spaces. Trees shall be pruned up to 6 feet to 8 feet clear off the ground or as required by ADA or City guidelines.

E.7.2 Individual developments within the Plan Area shall use trees that are provided in minimum 15-gallon size or larger for no greater than 50 percent of the trees planted. All other trees shall be box-specimen.

E.7.3 Entries at the north and south shall have unique tree plantings, and the design of these planting shall be approved by the Planning Division.

E.7.4 Seasonal interest shall be created with deciduous trees providing spring flowers and fall color.

E.7.5 Driveway entries, curb cuts, and curb ramps shall be constructed of concrete and shall match sidewalks to provide a consistent look and feel for hardscape along vehicular and pedestrian circulation routes.

E.7.6 Enhanced finishes and/or striping shall be used at the master plan entry, at all driveway entries, and at all crosswalks.

E.8 Trail and Paths

E.8.1 Trail surfaces shall be asphalt or concrete, provide for adequate clearances along the edges and overhead, and be suitable for their intended use. Refer to trail sections in Chapter 5 for trail dimensions.

E.8.2 Signage, ornamental landscaping, and trees shall be provided along the trail system to enhance user experience.

E.9 Stormwater Management

E.9.1 Project submittals shall comply with the Precise Plan's phased, performance-based approach to stormwater management, consistent with the San Mateo County Municipal Regional Stormwater Permit, and Daly City's municipal code pertaining to stormwater management. Projects shall minimize the amount of paved area. Where feasible, paved areas shall include "green" stormwater collection and treatment, and employ Low Impact Development (LID) features that minimize surface water runoff. LID features may include bioretention systems, swales, green roofs, and permeable pavers.

E.9.2 Stormwater retention features that minimize runoff into streets, parking lots, landscaped areas, and open spaces shall be incorporated, where feasible. Stormwater retention features include drainage swales and rain gardens.

E.10 Open Space Landscaping Standards

E.10.1 Landscaping shall define the edges of paths, plazas, and seating areas.

E.10.2 Trees shall be planted to shade walkways, gathering areas, parking, and other larger expanses of pavement.

E.10.3 Landscaping in setback areas shall create a transition zone between the sidewalk and street-level residential units and entries.

E.10.4 Landscaped areas shall be regularly maintained to keep them aesthetically pleasing, and to remove dead and dying plants.

E.10.5 Gateway or entry points shall be emphasized with distinctive trees and plants.

E.10.6 Existing trees, to the extent feasible, and healthy, are to be preserved and integrated into site designs.

E.10.7 To reduce water usage, all development shall employ water-efficient irrigation techniques, including micro–irrigation, drip systems, and weather-based irrigation controllers, instead of conventional sprinklers.

E.10.8 Native, drought-tolerant, or well-adapted tree and plant species shall be used.

E.10.9 Seasonal and year-round flowering shrubs and trees shall be located where they can be most appreciated by site users and passersby, such as adjacent to walks and open space areas, or as frames for building entrances and stairs.

E.10.10 All landscaped areas shall be designed by a landscape professional to the satisfaction of the Planning Division.

F. SIGNAGE

Where this section does not set standards, the Applicant and City staff shall use the Daly City Municipal Code. City review and approval of wayfinding signage shall be part of Conformance Review Where there is a conflict with the Daly City sign ordinance, this Precise Plan governs.

F.1 Signage Standards

F.1.1 Signs within the Plan Area shall comply with all regulations stated in the City's Zoning Ordinance (Chapter 17.32) unless otherwise specified in the Precise Plan.

F.1.2 Signs shall be made of high-quality, durable, and environmentally friendly materials.

F.1.3 Multi-tenant development anchor-identity signs should be complementary to any Plan Area signage or established by the Master Developer. Individual property owners will be allowed to use letter styles, but the overall sign should have one consistent material for letters and background.

F.2 Monument/Gateway Signage

F.2.1 The Precise Plan shall include up to two freestanding monument/gateway signs: at the Serramonte Boulevard and Entry Drive intersection and at the West Drive and Campus Drive intersection, which form major entry points to the Plan Area.

F.2.2 If provided, a single gateway or monument sign at the southern portion of the Plan Area near the round-about shall be located at Parcel E and be less than 4 feet high. The sign shall not obstruct sightlines for drivers to the extent safety is compromised.

F.2.3 If provided, a single gateway or monument sign at the northern portion of the Plan Area near the Retail Plaza shall be located at Parcel B. It may either be less than 4 feet high and no longer than 20 feet, or may be a tower structure--either integrated with the Parcel B building corner or separate from the building. If an integrated tower structure, the structure shall not project more than five feet beyond the face of the building in any direction. If an independent tower structure, it may not be greater than 32 feet in height and not more than 64 sq. ft. in area. The maximum face area of signage of the tower structure shall not exceed 200 sq. ft.

F.2.4 Gateway or monument signs shall not have internal illumination but will be lighted with externally mounted luminaires.

F.3 Building Signage

F.3.1 The physical design of signage shall conform to the architectural detailing of the associated building and shall be in proportion to the surface onto which such signage is mounted, as determined by the Planning Division.

F.3.2 Signage shall not obstruct architectural details such as recesses, structural bays, or windows.

F.3.3 Externally illuminated or halo lit signsshall be required. The use of internally lighted or box type signs are prohibited. Internally lighted signs measuring 2 sq. ft. or less are allowed.

F.3.4 No more than three (3) building residential signs shall be provided per building. These shall be limited to address number, street name, and/or a building name if desired. If only one is provided, it shall be placed close to the main entry to the building. If signage is provided at more than one location, a minimum of one shall be placed close to the main entry. The second and third can be located such that the top of the signage is not greater than 25’ feet from grade. The aggregate sign area shall not exceed 150 sq. ft.

F.3.5 Durable, vandal-resistant materials and finishes shall be utilized for address signs.

F.3.6 Conduit, tubing, or raceways shall be concealed. Transformers and other equipment for the signage shall also be concealed.

F.4 Storefront Signage

F.4.1 Signage for multi-tenant retail buildings shall be developed to minimize potential visual conflict, clutter, and competition.

F.4.2 Maximum size for sign area per retail tenant is 30 sq. ft. on the face of a building. A second sign per retail tenant, not exceeding 20 sq. ft., may be hung as either a banner or a

rigid sign perpendicular to the building face. Either of these two sign types may be attached to a building's architectural canopy.

F.4.3 For ground floor retail uses, hanging or projecting signs should be located near the front entry of a store. Coordinate with the overall design of the street wall. Hanging or projecting signs shall meet Americans with Disabilities Act (ADA) clearance requirements.

F.4.4 Ancillary retail space or leasing offices shall be signed in a manner consistent with the storefront signage standards in this section.

F.5 Prohibited Signs

Prohibited signs include:

F.5.1. Signs which rotate, move mechanically or by the wind, flash, blink or reflect light by means of a polished or mirrored surface.

F.5.2 Open flames, balloons, loudspeakers used to call attention to a product, service, or a property.

F.5.3 Signs which identify or advertise a product or service not available on the premises.

F.5.4 Externally illuminated signs where the source of light is directly visible or cause glare or reflections that are a traffic hazard or nuisance.

F.5.5 Signs which emit or reflect light by means of direct fluorescence, phosphorescence, or "day-glow" colors.

F.5.6 Any sign illumination which exhibits undue glare.

F.5.7 Any sign placed or displayed on vehicles parked primarily for the purpose of displaying the sign. (This does not apply to food trucks that are parked while they provide service.)

F.5.8 Internally lit signs where the entire face of the sign is illuminated, rather than just the graphics.

F.5.9 Advertising bench signs, unless required by SamTrans at Serramonte Blvd.

F.5.10 Off-site directional signs.

F.5.11 Roof signs.

F.5.12 Outdoor advertising billboard signs.

F.5.13 Abandoned signs.

G. LIGHTING

See Figure 3.8 Lighting Diagram. A uniform lighting approach will contribute to overall community aesthetic and ensure safety for walkways, bikeways, and roadways[13].

G.1 General Lighting Standards

G.1.1 Lighting shall incorporate dark sky principles by shielding fixtures to prevent light from emitting above a 90-degree angle. Any lighting source located on parking or rooftop parking shall be a full cutoff type.

G.1.2 Light shall be designed to minimize glare and light trespass into neighboring buildings and properties.

G.1.3 High-efficiency technology such as LED lighting with advanced controls shall be utilized to minimize energy consumption.

G.1.4 The use of energy–efficient, long-life LEDs with light color rendered as a warm white (maximum K 3000) is encouraged.

G.2 Street Lighting

G.2.1 Provide streetlights in general locations shown on Figure 3.8, Lighting Diagram for Locations.

G.2.2 Streetlights shall comply with Daly City standards.

G.3 Pedestrian Lighting

G.3.1 Provide pedestrian lighting in general locations shown on Figure 3.8, Lighting Diagram. Additional locations for pedestrian lighting are along pedestrian pathways in open spaces and in surface parking areas.

G.3.2 Pedestrian lighting shall not be taller than 25 feet in height.

G.3.3 Pedestrian lighting may be integrated with streetlighting by providing additional luminaires facing the sidewalk on streetlight poles, installed at a lower height than street luminaries.

G.3.4 Lighting in surface parking lots and service areas shall be directed away from surrounding buildings and properties using fixtures that minimize light trespass and glare.

[13]For Parcel A, no additional lighting is required to what is installed.

G.4 Lower Illumination Pedestrian Lighting

G.4.1 Commercial grade bollards, step lights, and path lights shall be used as appropriate along pedestrian walkways and plazas.

G.4.2 Nighttime lighting for recreational uses in parks and public spaces should be unobtrusive and control glare.

G.5 Building Lights

G.5.1 Lighting should be integrated into the design of buildings and building architecture to highlight significant architectural features such as signs, entrances, walkways, or storefront displays.

G.5.2 Building facades may be illuminated using shielded fixtures to highlight architectural features.

H.1 Definitions

Active Ground Floor Use: Active ground floor uses are land uses that generate pedestrian activity at the interior and exterior of buildings at the ground floor at streets and public spaces. Active uses can be retail, commercial, educational, artistic, institutional or community uses such as a community room or daycare.

Amenity Space: Residential amenity space may include co-working space, health, and wellness, grab and go snack items, pet amenities and other shared or community uses that can be visible to the street.

Building Envelope: The building envelope defines the spatial area within which permitted density can be configured. The Precise Plan defines the allowable building envelope horizontally by block size and required street frontage and vertically by building height, massing, and guidance for pedestrian, podium, and skyline levels of architectural design.

Build-to Line: The build-to line for a parcel is the line where the façade of the building, or the podium street wall, is located, parallel to and measured perpendicular from the property line.

Corner Expression: Corner expression is accentuating building massing at the joining of two facades with a projected, recessed, or vertical change in building massing.

Face of Curb: The face of curb is the vertical sloping surface of the side of a roadway curb, not including bulb-outs, curb extensions, curb-cuts, or pull-outs for drop off and loading zones.

Height: The height for a building is calculated from the building's Average Finished Grade to the top of the parapet at the building's primary roof. The Average Finished Grade is the average

of the high and low elevations at the building's exterior adjacent to North Drive, West Drive, East Drive, or Entry Drive, or the three access drives leading from East Drive or West Drive.

Massing: Massing is the three-dimensional bulk of a building in terms of general shape, form, height, width, and depth.

Pedestrian Level: Pedestrian level is the design of the ground floor public experience shaped by active ground floor use, diversity of use, and street frontage design.

Podium Level: The podium level is the portion of the building above the ground floor and below the skyline level that provides spatial definition to the adjacent street or public space.

Primary Building Wall: The primary building wall is the building façade. Window or wall recesses or projections are not counted as primary building wall or façade of the building.

Privately-Owned, Public Open Space: Privately-owned outdoor space that functions as public space but may have limited hours of availability.

Property Line locations: Property line locations to measure Build-to lines are measured from the face-of-curb for publicly accessible private streets, a designated property line along an access drive, or back of sidewalk along public streets.

Public Realm: The public realm is exterior urban space shaped by buildings comprised of publicly accessible streets, parks, open spaces, pathways, and civic facilities.

Street Wall: The street wall is the continuous façade of a building that establishes the edge of the public realm for a street or public space.

Skyline Level: The Skyline level is the uppermost occupiable portion of the building above the podium level. The Skyline level contributes to the overall urban form and skyline of the plan area.

Setback: The required minimum distance for the placement of a building measured from a property line, face of curb or another feature.

Streetscape: The visual character of a street comprised of the travel way, bike facilities, sidewalk, site access, landscape, paving, street furniture, building frontage, open space, views, and other perceptible urban features.

Stepback: Stepback is a horizontal recess applied to the upper floor or floors of a building to reduce shadow area on the adjacent street or open space.

Transparency: Pedestrian level building design that creates visibility and permeability between the building and the adjacent sidewalk or public space.

Vertical Shift: Vertical shift is variation in the roof line or vertical massing of the building or building elements.

III. IMPLEMENTATION

I. MAINTENANCE

Subject to the provisions of any applicable State law, the following shall apply:

I.1.1 **Master Association**. Prior to the issuance of any building permit to construct any market-rate residential unit in the project, the Jefferson Union High School District (District) shall formand perpetually maintain a Master Association for the Serramonte Del Rey Neighborhood ("Master Association"). The Master Association shall be self-governing and govern common areas for the term of the Precise Plan uses are in operation. The purpose of the Master Association, among other responsibilities, shall be to maintain all common areas within the Precise Plan area including streets, parks, and other areas not maintained by individual parcel developers that are not dedicated or otherwise conveyed to a public agency in a neat, safe and healthful condition, including the ongoing removal of litter throughout. Until the Master Association is formed, the District is responsible for the foregoing.

I.1.2 **Maintenance Plan**. A maintenance plan for roadway, park, and utility maintenance shall be submitted by the applicant and approved by the City prior to the issuance of any building permit to implement the project. A litter control maintenance plan shall be submitted that includes provision for on-goingletter and garbage control. The maintenance plan shall be incorporated into the CC&R's in connection with the creation of the Master Association at the discretion of the District and recorded at such time.

Minimum Requirements for Trash and Litter Disposal shall be as follows:

- All trash shall be confined in approved receptacles and enclosures. Any building permit application submitted to the City for review shall be accompanied by a letter from the trash hauler indicating that the proposed trash receptacles provided in the building for which the permit is sought to meet the hauler's requirements for quantity, size, and accessibility.
- All unenclosed materials, equipment and/or supplies of any kind shall be maintained within approved enclosure areas. Any stacked or stored items shall not exceed the height of the enclosure.
- All trash and storage enclosures shall be properly maintained in accordance with approved plans.
- All waste materials generated by the development, such as cardboard boxes, skids, garbage, litter, etc., must be stored in the enclosure for disposal.
- No waste material shall be visible at any time.
- All enclosures shall be designed to conceal the contents.

- All enclosures should be kept clean and free of odor.

I.1.3 **Maintenance and Repair - Master Association**. The Master Association shall develop a maintenance plan (including a street sweeping, street surface repair and replacement, and garbage disposal plan approved by the Planning Division and theDepartment of Public Works) for the upkeep of common areas, private streets, and infrastructure. The Master Association will be responsible for the maintenance, litter removal and repairs of publicly accessible common areas that are not part of individual parcel development, including streets, sidewalks, bicycle lanes, parks, open spaces, trails and paths, utilities and improvements in streets including temporary and permanent storm water features, street lighting, landscaping, planter strips, street furniture and the fixtures, furniture and equipment located in the parks.

I.1.4 **Maintenance and Repair - Parcel Specific Responsibilities**. Parcel Developers or, if the property interests of such Developers are conveyed, their successors in interest, are responsible the maintenance, replacement, repairs and litter removal for on-site improvements on their respective parcels, including exterior equipment, fixtures, walls, roofs, windows, doors and other architectural, landscaping and publicly accessible common areas on private parcels in a clean, sanitary and attractive condition. The Developer of a parcel shall be responsible for the maintenance, replacement, repairs and cleaning of improvements within exclusive easements on their parcel.

I.1.5 **Budget**. The Master Association shall prepare an annual budget to fund the costs incurred in maintaining the publicly accessible common facilities. The Master Association shall undertake an inventory of publicly accessible common area improvements requiring maintenance, litter removal and repairs, such that each phase of development is adequately budgeted for maintenance and operations of improvements. Landscape maintenance budget shall include consideration of level of maintenance and operation expenses commensurate to the anticipated level of use of park and recreational facilities. The Master Association may employ or contract out to perform maintenance, litter removal and repairs..

J. PHASING

J.1 **Timing**. The sequence and timeline of development will ultimately depend on market conditions. The pace of development will fluctuate with the regional economy, capital expectations and availability, costs for development and the conditions of the Daly City housing market.

J.2 **Public Improvements**. For each phase of development there are corresponding street, park, open space improvements and utilities necessary to support development of individual parcels per Table 7.1 and as shown in Figure 7.1.

Table 7.1: Parcel Phasing and Public Improvements

PHASE	PARCEL	STREETS	PARKS AND OPEN SPACE
1	B	• Entry Drive • North Drive • North Access Way • Callan Boulevard improvements within parcel	• Entry Drive Plaza • Overlook Park • Eastside Recreation Trail within parcel
2	C	• South Access Way • Callan Boulevard improvements within parcel • If Parcel C before Parcel D: East Drive from Campus Drive to South Access Way	• Eastside Recreation Trail within parcel
	D	• East Drive from North Access Way to South Access Way • North Access Way • South Access Way • Callan Boulevard improvements within parcel	• Eastside Recreation Trail within parcel
3	E	• West Drive from North Drive to Campus Drive	• Central Green • South Point Park
	F	• West Drive from North Drive to Campus Drive	• Westside Walking Trail

Notes:

1. If Parcel E is built before Parcels C and D, then East Drive and North Drive will be constructed including the roundabout.
2. If Parcel F is built before Parcels C. D and E, then West Drive and the roundabout will be constructed.
3. Serramonte Boulevard and Highway 1 ramp intersection improvements will be constructed with the first market rate development per the Development Agreement.
4. Bike lanes on Campus Drive to Hickey Blvd will be constructed concurrent with the roundabout.

5. See Development Agreement for timing of additional off-site improvements.
6. A Storm Drain Memo shall be submitted for conformance review for each phase in accordance with the Master Plan Drainage Memo. At Building Permit submittal: a Hydrology & Hydraulics report based on final design will be provided with the Building Permit submittal in accordance with the Master Plan Drainage Memo.
7. The first parcel of Parcel B and Parcel D to develop is required to build North Access Way from their building to the curb across the access way, so there is a two-way paved travel way. The subsequent parcel is required to complete the sidewalk, landscaping and storm water treatment facilities between their building and the curb on their side of the North Access Way.
8. The first parcel of Parcel C and Parcel D to develop is required to build South Access Way from their building to the curb across the access way, so there is a two-way paved travel way. The subsequent parcel is required to complete the sidewalk, landscaping and storm water treatment facilities between their building and the curb on their side of the South Access Way.
9. The Head Start facility may be located on other parcels.
10. See the Tentative Map for utility improvements associated with each parcel. On and off parcel utility improvements in the Precise Plan Area shall be sized to support buildout of the Precise Plan.
11. The chronology of phasing in Table 7.1 is not intended to be binding, and the number of phases, number of units, and timeline for the project build-out will ultimately depend on market conditions. The rate of the buildout of housing will fluctuate with the regional economy, capital expectations and availability, costs for development and the conditions of the Daly City housing market. For the purposes of assessing consistency with the Table 7.1 for conformance review, a reviewer shall assess whether development of a listed parcel includes the streets, park, open space utilities needed to support the development of the parcel and future phases of development.

K. CONFORMANCE REVIEW

K.1.1 **Purpose**. Conformance Review is the Precise Plan's ministerial, streamlined process to approve proposed projects "as-of-right" that demonstrate Plan Consistency with the Precise Plan and Entitlement Documents and Compliance with the Objective Development Standards of the Precise Plan, as defined below. Design Review is not required for projects ministerially approved "as-of-right."

K.1.2 **Plan Consistency**. Plan Consistency is the review of project submittal documents for conformance to:

1. Serramonte Del Rey Precise Plan (Attachment "A") requirements for the scope and phasing of park, open space, street, accessway, storm water, water, wastewater, utility, emergency access, and on and off-site transportation improvements associated with each parcel per Precise Plan Figure 7.1 Phasing, Table 7.1 Development Phasing and Appendix C: Civil Engineering Exhibits, and

2. Entitlement Document requirements of the Development Agreement, Tentative Map, Conditions of Approval, Inclusionary Housing Agreement and the Mitigation and Monitoring program.

K.1.3 **Compliance with Objective Development Standards ("Compliance")**. Compliance with objective development standards is the review of project submittal documents for

conformance with the Precise Plan's Objective Development Standards as listed in Section II above.

K.1.4 **Variance from Numerical Standards and Precise Plan.**

Deviations from the numerical standards in Section II above may be permitted by up to 20 percent for any parcel, upon approval by the Planning Division. Deviations from the minimum and maximum densities prescribed in Table 3.3, the requisite amount of private open space (150 square feet per dwelling unit), and the quantity and general location of common open space shall not be permitted.

Modification or reconfiguation of the Precise Plan pattern of streets and blocks, shape of open space areas, site layout, orientation or location of buildings, architectural or landscape elements may be permitted provided all other Objective Design Standard can be met Deviations from the approved roadway configurations, including lane provision and width, shall not be permitted unless approved by the Department of Public Works.K.1.5 **Submittal Requirements**. Submittal requirements shall include documentation as set forth in the 2023 Daly City Municipal Code Section 17.28.030 C. 2. (a) – (f), Procedure for Application for Planned Development of the Daly City Zoning Ordinance, and shall include a completed Conformance Review Check List, as attached to the Precise Plan as Appendix A, and any additional information requested by the Planning Manager. Submittal requirements for minor modifications to approved and constructed projects to be per Planning Manager request.

K.1.5 **Review Process and Timing.**

1. **Pre-submittal conference**. Upon request of the Applicant, the Planning Manager shall convene a pre-submittal conference to review the scope of the project, submittal requirements, conformance review process, timeline, and staff availability. It is an opportunity for the Applicant and the design team to ask technical questions to prepare a submittal. The Planning Manager, City Engineer, and Development Coordinating Committee members shall attend upon request.

2. **Submittal.** The Applicant shall submit documentation as described under "Submittal Requirements" above.

3. **Conformance Review.** The Planning Manager, designated staff or third-party consultants shall conduct the Conformance Review per the responsibilities described in Table 7.2. The Planning Manager shall coordinate reviewer

comments and provide them to the Applicant no later than 45 business days after filing a project submittal.[14]

4. **Determination.** The Planning Manager shall review the project submittal and reviewer comments to determine whether the submittal is plan consistent and standards compliant and therefore approved as-of-right.

   If the Planning Manager deems a project application inconsistent with the Precise Plan or Entitlement Documents, and/or non-compliant with the Objective Development Standards in Section II, prior to a decision to deny approval of the proposed project, the Planning Manager shall provide the Applicant with written documentation as to what elements of the submittal are not in conformance.[15]

   The Applicant can revise the submittal and resubmit. The Planning Manager, upon receipt of the re-submittal, shall make their determination. Total City Review Time from submittal to determination shall not exceed 90 business days.[16]

   If the City fails to complete Conformance Review per the above timing requirements, the submittal shall be deemed to be conforming with the Precise Plan and Entitlement Documents, planning review shall be complete, and requested permits shall be issued.

5. **Notification of Determination.** The Planning Manager shall communicate in writing to the Applicant the Planning Manager's determination.

6. **Appeal**. A Conformance Review determination may be appealed within 20 business days to the City Manager by the Applicant. City Manager shall make a determination within 20 business days of receipt of the appeal. The City Manager's decision on appeal shall be final and not appealable.

K.1.6 **Review Criteria**. The following criteria shall guide the determination of plan consistency and standards compliance:

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14 Notwithstanding anything in this chapter, to the extent the Permit Streamlining Act or other State Law applies for shorter deadlines, the regulations in such laws shall govern.

15 This process is separate and independent from the Planning Manager's coordination and provision of any reviewer comments on the Applicant's initial project submittal, as required under the "Review Process and Timing" section of this Chapter.

16 For this paragraph, "City Review Time" shall mean the time, measured in business days, taken by the City to review a project submittal and provide comments to the applicant or render a Conformance Review decision. City Review Time does not include the Applicant's time from the date of receiving comments to the date of resubmitting a revised project submittal responsive to comments.

- All Figures in the Precise Plan illustrate the general arrangement and relationships among parcels, buildings, streets, accessways, parks and open spaces, and exact compliance or conformance is not required so long as other objective criteria are met.
- The final configuration of parcels, buildings, streets, accessways, parks and open spaces are subject to refinement, and exact compliance or conformance is not required so long as other objective criteria are met.
- Consistency and conformance with the Precise Plan shall be construed rationally and shall accommodate unforeseen solutions or innovation that can occur over the extended build-out of the Precise Plan. Notwithstanding the above, no deviations are permitted to minimum residential densities and minimum open space area requirements.

K.1.7 **Standards Interpretation**. The nature of the Objective Standards is such that consistency determinations are ministerial, without the exercise of discretion. Accordingly, it is not anticipated there will be cause for interpretation of these standards by the City. In the unforeseen event that interpretation is required, the Planning Manager shall make any interpretation of the Precise Plan's development standards required to evaluate the proposed project, and shall inform the reviewer of any interpretations as needed. The Planning Manager shall include any interpretations as part of its written determination of consistency with the objective development standards of the Precise Plan.

K.1.8 **Staffing**. The Planning Manager shall check on staff availability prior to the pre-submittal conference to meet the conformance review timeline. If staffing is not available, the City can designate a third-party consultant to be paid for by Applicant. Consultants shall have professional planning experience on similar projects. The Applicant shall pay all reasonable staff coordination and third-party consultant costs.

K.1.9 **Staff or Consultant Review Responsibilities**. Staff or consultant review responsibilities are per Table 7.2, Reviewer Responsibilities.

- The Planning Manager shall provide oversight and make all Conformance Review determinations.
- Staff of consultant shall compare the project submittal, Conformance Check List, and applicable plan elements, standards and requirements of the Precise Plan and the Entitlement Documents.
- Reviewers are to provide written comments on plan consistency to the Planning Manager. In the case where the reviewer concludes inconsistency with plan elements, or non-compliance to objective development standards, the reviewer shall identify specific objective standards to be addressed to achieve a consistency.
- If requested by the Applicant, the Planning Manager and any reviewers shall meet with the Applicant to discuss steps to resolve any comments.

The Planning Manager shall consider the recommendations of the reviewers, and shall make the final determination for approval, approval with conditions, or denial of the submittal based on objective criteria as set forth herein.

Table 7.2: Reviewer Responsibilities

RESPONSIBILITY		REVIEWER				
PLAN CONSISTENCY	STANDARDS COMPLIANCE	PLANNING MANAGER	STAFF OR THIRD-PARTY CONSULTANT (IF RETAINED)	CITY ENGINEER	DEVELOPMENT COORDINATING COMMITTEE[17]	HOUSING AND COMMUNITY DEVELOPMENT MANAGER
Phasing		X		X		
Parks		X	X			
Streets		X	X	X		
Utilities, off-site transportation Improvements		X		X	X	
Development Agreement		X				
Final Map				X		
MMRP		X		X	X	
Inclusionary Housing Agreement						X
Tentative Map and Conditions of Approval		X		X		
	Land use and urban design	X	X			
	New Buildings	X	X			
	Parks	X	X			
	Streetscapes	X	X			
	Exceptional Projects[18]	X	X	X	X	X

[17] Development Coordinating Committee includes Planning Division, Building Division, Engineering Division, Department of Water and Wastewater Resources, North County Fire Authority and other committee members as deemed appropriate by the Planning Manager.

[18] For exceptional projects, Planning Manager to determine at pre-application conference what type of review and staffing is required.

RESPONSIBILITY		REVIEWER				
	Minor modifications to existing buildings & facilities	X	X	X		

IV. PLAN AMENDMENTS

Amending the Precise Plan shall follow the requirements of the Daly City Municipal Code section 17.28.020 (I) as of the date of approval of the Precise Plan. This Municipal Code section is included as a part of Supporting Documents provided with this Precise Plan.

V. SUBDIVISIONS

Subdivision of parcels shall conform to the requirements of the Precise Plan and the Daly City Municipal Code Title 16 Subdivisions.

VI. INCLUSIONARY HOUSING

The following requirements are subject to the terms and exceptions provided in the affordable housing agreement:

A. Construction of inclusionary units is required within the Planned Development Zone PD-31 area pursuant to an Affordable Housing Plan.

B. This Precise Plan authorizes flexibility in timing of construction and geographic distribution of inclusionary units throughout the PD-31 area to allow for a greater number of inclusionary units and deeper level of affordability than the minimum levels required by the City Ordinance.

C. The Precise Plan requires, for Parcels B-F, not less than 20 percent of the total number of total residential units completed at final build-out to be affordable housing, consisting of 13.5% low-income units at no greater than 60% AMI and 6.5% moderate income units at no greater than 120% AMI. One market rate residential building can be constructed prior to construction of affordable units. 150 low-income affordable units are planned to be located on Parcel C. The subsequent phases after the first market rate building and the first residential structure built on Parcel C have been constructed can be phased and include unit counts proposed by the developer in any way such that the overall percentage of affordable units does not drop below 20% of all constructed residential units at Parcels B-F at any time consisting of 13.5% low-income units and 6.5% moderate income units.

VII. CALIFORNIA ENVIRONMENTAL QUALITY ACT

All proposals for development shall be subject to the mitigation measures specified in the Environmental Impact Report (EIR) certified by the City Council as part of this Precise Plan.

VIII. ENTITLEMENT DOCUMENTS

The term "Entitlement Documents" shall refer to all the below except the Precise Plan.

- **General Plan Amendment**. By Resolution No. [], City Council approved text and map amendments to the General Plan to enable high density residential and mixed-use residential development.
- **Precise Plan**. By Resolution No. [], City Council approved the Serramonte Del Rey Precise Plan, which modified land use designations and created a new street and open space network.
- **Development Agreement**. The District and the City of Daly City entered into a Development Agreement to secure vested development rights and terms.
- **Affordable Housing Agreement**. The District and the City of Daly City entered into an Affordable Housing Agreement to secure rights and terms for the Project's Affordable Housing Plan.
- **Tentative Map and Conditions of Approval**. The City Council approved a Tentative Map indicating the subdivision of the District lands into parcels with infrastructure and open space improvements, including Conditions of Approval.
- **Mitigation and Monitoring and Reporting Program**. The City of Daly City, as the lead agency under the California Environmental Quality Act (CEQA) prepared the project's Environmental Impact Report (EIR) to disclose to the City, public and other agencies the environmental impacts of the project. By Resolution No. [] the City certified the EIR for the project, adopted findings, statement of overriding considerations [if needed] and a Mitigation Monitoring and Reporting Program (MMRP). The Precise Plan is consistent with and will implement the MMRP as approved by the City Council.

Memorandum

To: Tina Van Raaphorst, Associate Superintendent
Jefferson Union High School District

From: David Shiver, Principal
Kathleen Diohep, Vice-President

Date: July 10, 2020

Re: Office Market Assessment and Fiscal Impact Review for Serramonte Del Rey Site, Daly City, California

Introduction and Purpose

BAE Urban Economics, Inc. ("BAE") has been engaged to prepare an analysis of the office market position for the 22-acre site owned by the Jefferson Union High School District ("JUHSD") and a review of the fiscal impact of residential development in Daly City, California. This site, a former high school, is a portion of a larger 50-acre site that was entitled for 500,000 to 700,000 square feet of office space plus residential in 1985 ("the Site").

BAE is an award-winning urban economics and public-benefit real estate and urban economics consultancy. Since 1986, BAE has completed more than 2,300 projects for clients that include public agencies, non-profit organizations, financial institutions, and private developers throughout the US. BAE has prepared hundreds of market studies, financial feasibility studies, and highest and best use analyses for a variety of commercial, residential, and institutional product types.

This analysis evaluates the site's potential to attract commercial office use. The analysis utilizes market-based location criteria for office development, set in the geographic and historic context of real estate development in Daly City, San Mateo County, and the San Francisco Bay Area over the past 35 years.

This analysis also presents the results of the fiscal impact analysis of three recently approved residential projects in Daly City to demonstrate the potential for residential development contemplated for the JUHSD site to generate positive fiscal benefits to the City.

Key Findings – Market Viability of Office Use

Overview

Based upon a site inspection, neighborhood tour, careful review of market data and evaluation of historic and current office development trends, BAE finds that the JUHSD's Serramonte Del Rey site is not a competitive location to attract office development. **The site has no overall potential for office development whether that is Class A, back office, biotech and/or medical office use undertaken by either commercial developers or corporate end users.** This conclusion is based upon the site's characteristics as well as Daly City's relative position in the regional economy and San Mateo County office market. Office development has been a permitted use at the site since 1985, yet only one medical office building was built in the ensuing 35 years. If office demand and rents would support developing new buildings, it would have occurred during the multiple real estate market cycles that have occurred since 1985.

BAE based its analysis on real estate market data as of the end of 2019 and market research conducted during February and March of 2020. The economic impacts of the Covid-19 pandemic have been significant and abrupt with short-term reduction of office demand driven by shelter-in-place orders. The long-term impact of the pandemic on the regional office market demand is uncertain and will likely change the regional office market dynamics, both in terms of overall demand and space design, but likely not in a manner that would change the finding that the JUHSD site is not a viable office development location.

JUHSD Site Characteristics

BAE has identified key office location criteria that are used by commercial developers and end users to select sites for office development (see Figure 1, below). These criteria are based upon BAE's ongoing discussions with commercial developers active in the Peninsula Market and technology company real estate representatives, as well as upon BAE's recent experience with other commercial projects for public agencies and private parties on the Peninsula. BAE evaluated both the JUHSD site and other alternative locations in the market area against these criteria.

1. **Critical Mass.** At 22 acres, the site lacks the size to accommodate the scale of office development necessary to establish a new successful employment center with a distinct identity. An example of critical mass is South San Francisco's 500-acre lifescience district east of Highway 101. This city has continued to strengthen its role as a biotech cluster, adding 1.6 million square feet of new Class A office over the past ten years along with additional new development planned by Genentech, its anchor end user. Other large sites for new office development can be found in San Francisco

south of Mission Bay, Redwood City, the Peninsula/Highway 101 Corridor, and potentially elsewhere in Daly City.

Figure 1 Office Location Criteria

		JUHSD Site	Daly City BART Area	Redwood City	Peninsula/ 101 Corridor	San Francisco/ SOMA
1	Available Land for Project w/ Critical Mass?		Potential	✓	✓	✓
2	Walkable to BART/Caltrain Transit		✓	✓	✓	✓
3	Employment Center		✓	✓	✓	✓
4	101 Corridor			✓	✓	✓
5	Authenticity/ Placemaking		Potential	✓	✓	✓
6	Tech Company Appeal/ Cool Factor		Potential	✓	✓	✓
7	No Cap on Office Development	✓	✓		✓	
8	Rents Justify New Office Construction?		Potential	✓	✓	✓

Source: BAE, 2020.

2. **Walkable to BART/Caltrain.** Proximity to public transit, in particular BART and Caltrain, is highly desirable to office tenants. While the site is served by Samtrans bus service, it is over two miles from the Colma BART Station, well beyond the typical half-mile that otherwise, everything else being equal, would make the site attractive as a mixed-use, transit-oriented development that is preferred by office tenants. Reflecting market demand for office space near transit, Daly City's own Class A office inventory is adjacent or near the Daly City BART Station.

3. **Employment Center.** Office businesses like to be near other office businesses –this is an agglomeration effect that is seen throughout the Bay Area. The site is not located in a recognized employment center and it is located in a primarily residential neighborhood with multi-family residential developments defining the northern and southern gateways after exiting Highway 1 to reach Serramonte Boulevard. The site is set back approximately 400 feet south of Highway 1 and a half-mile from Interstate 280. An office project here cannot offer visibility and identity that is often desired by corporate end users and/or tenants.

4. **Highway 101/Caltrain Corridor.** Almost all existing, planned, and proposed Class A office space in the Northern San Mateo County market is located along the Highway 101 and Caltrain corridor. As of the end of 2019, seven million square feet of new office projects were under construction along this portion of the corridor along. An additional 30 million square feet are under construction, entitled, or proposed from Hunters Point and Candlestick Point in San Francisco though the corridor to Menlo Park at the southern end of San Mateo County, reflecting its strong gravitational market pull. The Serramonte Del Rey site is at a distinct disadvantage by not being located on this corridor.

5. **Authenticity/Placemaking.** Commercial office developers and end users increasingly seek locations that offer a sense of urban or small-town authenticity and a mix of uses including office with residential and retail goods and services. The City of Redwood City has successfully leveraged its historic downtown and Caltrain Station to accommodate significant new office (as well as residential) development. The City of San Mateo has successfully guided the redevelopment of the Bay Meadows racetrack as a new attractive location for technology offices, in walkable, transit-oriented locations with new housing. The JUHSD site does not offer the same opportunity for placemaking due to its location away from the BART, or Caltrain stations, or the City's Top of the Hill commercial district. Daly City itself has opportunities for mixed use office development at its BART Station and other high visibility sites.

6. **Tech Company Appeal/Cool Factor.** Developers are building office space to meet the changing office needs of employers. Technology and lifescience companies in the Bay Area fiercely compete for skilled labor and tend to cluster to make job changes less costly and disruptive to the employee. To be competitive and attract top talent, employers tend to select facilities that provide a 'cool factor,' e.g., unique setting, site design, architecture, and package of amenities that are attractive to the Millennial and Generation Z workforce. The JUHSD site is not well suited to be competitive due to its small size, relatively inferior location, and lack of visibility.

7. **No Cap on Office Development.** Cities such as San Francisco and Redwood City have adopted legislation that places a cap on office development that serves as a barrier to entry for new office development. The Serramonte Del Rey site has an advantage by its location in Daly City that has no overall city-wide cap of office space. There is no barrier to developing the office space that was entitled for the site in 1985.

8. **Rents Justify New Office Construction?** Financial feasibility is driven by the relationship between the rents a developer can charge and the cost to develop their office project. While office rents have been strong enough to justify new construction along the Highway 101/Caltrain corridor and, potentially at Daly City's BART Station, the

locational disadvantages of the Serramonte Del Rey site would likely result in a project not being able to achieve the rents necessary to support project development costs and provide a market rate of return to investors.

Daly City Office Market Trends

Located outside the Highway 101/Caltrain Corridor, the office sector in Daly City has failed to gain traction over the past few decades despite the presence of two BART stations and City efforts and investment to stimulate Class A office development during the longest economic expansion in U.S. history. This finding is based upon the following observations:

- Daly City has only two Class A office buildings that are located at the Daly City BART Station and together they comprise 438,000 square feet. The Redevelopment Agency project, Pacific Plaza development, is an example of modest success of attracting Class A office space after utilizing its redevelopment tools (including site assemblage and subsidies). However, a recent sale of the property in 2018 was for significantly less that its replacement cost which indicates continued weakness in the Class A sector despite adjacency to a BART station.

- Both Class A buildings changed ownership recently and have experienced increasing occupancy and rents as they benefited from their location in proximity to BART. However, Daly City recently marketed three sites near the Daly City BART station to the commercial developer community; the City has reported that these sites did not receive interest for office use.

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Key Findings - Fiscal Impact of Alternative Residential Use

Overview

BAE reviewed three FIAs for new residential development in Daly City and has made the following findings regarding the direct fiscal impacts:

- The three FIA analyses prepared recently for Daly City projects all indicate that residential development at the scale and density of in-fill development projects, such as what is being considered for the Serramonte Del Rey site, can yield net positive impacts.

- New residential development injects additional retail spending power into the city that can support its existing and expanded retail centers and corridors.

- Daly City has well-performing retail centers such as the Westgate Mall and Serramonte Plaza with a wide offering of retail stores that draw shoppers from both inside and outside the city. However, the City's retail sector faces continued pressure from e-commerce and the uncertain impacts of the current Covid-19 pandemic.

- Daly City can support the long-term sustainability of these centers by adding new residents. Each new resident, from which a higher percent of spending can be captured locally, netting more retail sales than under a situation faced by many other cities where new residents chose to go outside the city for a significant portion of their shopping.

Indirect Fiscal Benefit

There is as well an important indirect fiscal benefit associated with new residential development specifically at the Serramonte Del Rey site. JUHSD intends to ground lease the Site for development which will generate an ongoing stream of cash rental payments. This new source of revenue will enhance JUHSD's operating budget and thus improve the quality of education in Daly City.

Improved school quality has been documented to increase housing values in the community that the schools serve. This, in turn, will increase tax revenues for both JUHSD and Daly City, therefore stimulating a virtuous cycle that improves the quality of City services and school district operations.

Site Description and Location

Daly City Location

The Site is located within Daly City, the largest city in San Mateo County with a population of 109,122. The American Community Survey by the Census for 2018, identified 64,871 Daly City residents in the labor force. Of those, almost one third worked in Daly City. The City has a significant retail and commercial tax and employment base with two major shopping centers.

Site Location and Adjacent Uses

Within the Serramonte neighborhood of Daly City, the Site is situated in the northern portion of the Precise Plan area, bounded by Serramonte Boulevard, Callan Boulevard, Hickey Boulevard and St. Francis Boulevard. (See Figure 2 on next page). It has a sloped topography and existing groves of evergreen trees creating a buffer from the neighboring uses. To the east is the Chinese Cemetery, to the north medium density apartment complexes, and to the west, single-family homes. To the south are medium density apartments and medical office uses.

Generally framed by Interstate 280 and State Routes 35 and 1, the Serramonte neighborhood of Daly City was developed in the late 1960s and early 1970s as a residential neighborhood with commercial uses near Interstate 280. The Serramonte Plaza shopping center is a successful 1.1 million square foot regional shopping center, which expanded by 250,000 square feet in 2018 and is currently undergoing additional redevelopment. While the Site is within walking distance of the Serramonte Plaza and easily accessed from the neighboring highways, it is over 2 miles from a BART station.

1985 Precise Plan

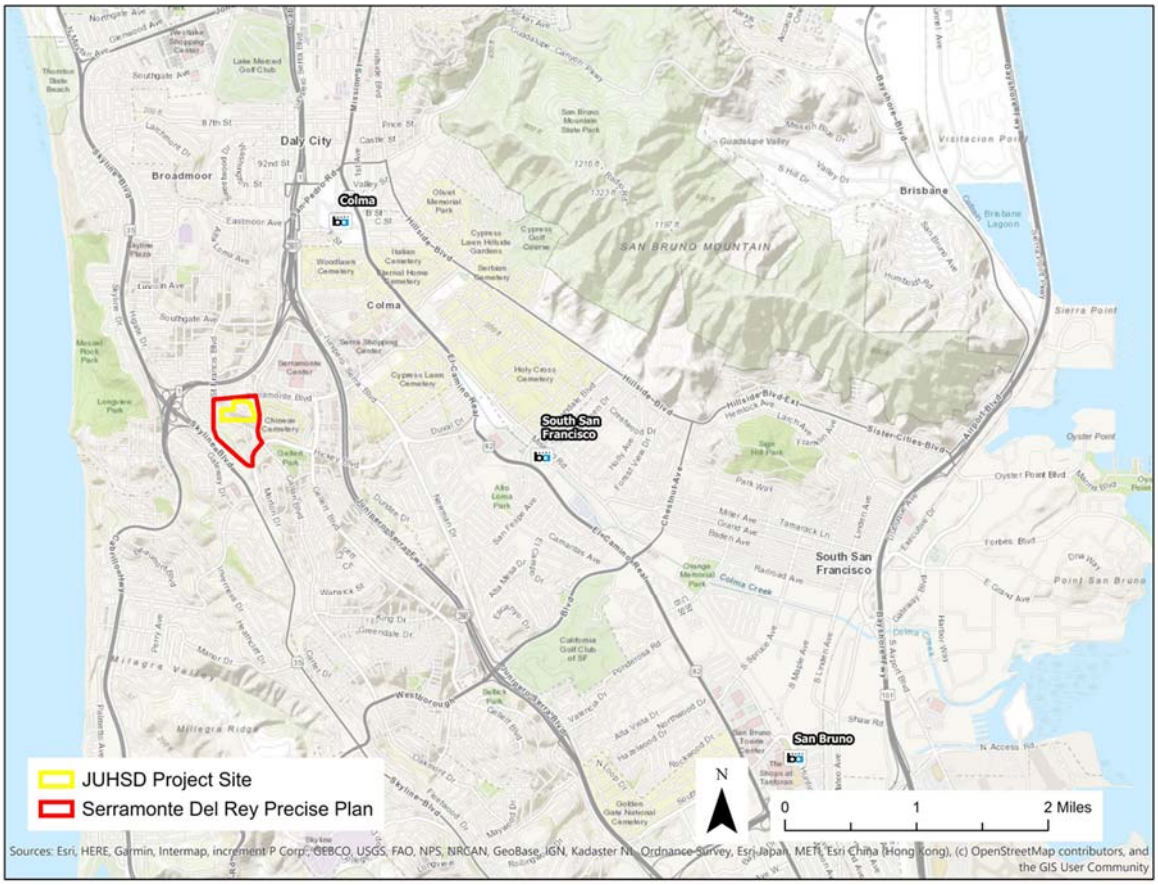
In 1985, Daly City adopted the Serramonte Del Rey Precise Plan ("Precise Plan") that delineated land uses for the 50-acre site owned by JUHSD and ground leased to a real estate developer, Southwest Diversified. The Precise Plan permitted a phased, mixed-use project on the 30 developable acres with between 200 to 575 housing units and between 740,000 and 1.2 million square feet of office space. Several parcels were designated to be either office or residential. Three to twelve story buildings are allowed in the Precise Plan. In January 2020, Daly City revised the Precise Plan to include the JUHSD faculty and staff housing project at the northwest corner of the Serramonte Del Rey site.

Development and Leasing History

The underlying concept when the Precise Plan was adopted in 1985 to create a first-class office park that could attract build-to-suit corporate tenants seeking office space at larger floor plates and lower prices than could be found in San Francisco. An apartment complex, Serramonte Ridge, was developed in 1987 on 9.6 acres and has 396 units in six three-story buildings. One office building of 76,000 square feet, 901 Campus Drive, was built in the Precise Plan area in 1990 on 2.77 acres and is leased for medical uses. The initial developer constructed the apartments and the 901 Campus Drive office building but did not exercise

their option to develop the second phase on the northern portion of the site. In the intervening decades, JUHSD closed the high school, moved in its district offices, and leased space to a mix of tenants.

Figure 2: Site Location, Daly City



More recently, 2.7 acres were leased to a charter high school that opened in 2019, on a site designated for office use. Under construction now are 122 units of housing for employees of JUHSD on 3.9 acres at the northwest corner of the plan area.

The analysis below addresses the remaining development capacity of the site identified for as much as 700,000 square feet of office.

Daly City Office Market

Overall Daly City Office Market

Daly City has an inventory of approximately 1.5 million square feet of office space in 81 office buildings, according to data obtained from the CoStar Group, a national real estate market data provider. The 16 buildings larger than 20,000 square feet. include 1.2 million square feet as shown in Table 1 below. Medical office buildings account for a significant amount of Daly City's office inventory, including those which are part of the Seton Hospital Campus and the Kaiser Medical Office building at 395 Hickey Blvd, built in 2002. The office building at the site, 901 Campus Drive**,** a three-story, 75,000 square foot Class B office building, was built in 1990. It is a medical office building anchored by the Palo Alto Medical Foundation and Campus Surgery Center. The building was 80 percent occupied as of the end of 2019. It sold in June 2018 for $30 million, or $395 per square foot, which is significantly less than the replacement cost (currently over $800 or more per square foot for Type I construction)

Table 1: Daly City Office Market Characteristics

	All Buildings				Buildings < 20,000 sq.ft.			
			Vacancy 3-4-2020				Vacancy 3-4-2020	
	Sq.ft.	#	*Sq.ft.*	%	*Sq.ft.*	#	*Sq.ft.*	%
General Office								
Class A	438,173	2	43,280	10%	438,173	2	43,280	10%
Class B	202,477	8	4,861	2%	181,121	5	4,861	3%
Class C	218,517	33	5,062	2%	40,910	2	-	0%
Subtotal	859,167	43	53,203	6%	660,204	9	48,141	7%
Medical Office								
Class B	398,494	7	28,487	7%	362,378	4	26,918	7%
Class C	228,116	11	-	0%	176,981	3	-	0%
Subtotal	626,610	18	28,487	5%	539,359	7	26,918	5%
Total	1,485,777	61	81,690	5%	1,199,563	16	75,059	6%

Source: CoStar, BAE 2020

Note that the 2100 Junipero Serra building, built in 2001, and the Kaiser facility built, in 2002, are the newest office buildings in Daly City. Although Daly City has relatively low office vacancy rates, no new office is proposed as the rents are not high enough to support new construction. Current proposed projects in Daly City only include very modest amounts of office space included in mixed-use projects. Appendix A provides a discussion of the opportunity sites in Daly City that could be developed for office uses.

Daly City Class A Office Market

There are two Class A office buildings in Daly City[1], both located on Junipero Serra near the Daly City BART Station. The following is a brief summary of these two properties.

2171 Junipero Serra Boulevard, a seven-story, 55,000 square foot building completed 1989 that is one half mile from the Daly City BART station and has visibility from Highway 280 as well as ocean views. It was the first high-rise built in Daly City and, in 1990, the City purchased a 51 percent share of the building to avoid default by the developers. The City held that ownership stake for over a decade. The building traded for $24 million in 2016, a value of $436 per square foot., significantly less than costs of new construction. In 2017, almost 13,000 square feet were vacant, a 23% vacancy rate. The new ownership upgraded the building and substantially increased occupancy. At the present, there are no suites advertised to lease and rental rates are not available.

2001 Junipero Serra Boulevard, a nine-story, 383,000 square foot building that was built in 2001 with direct access to the Daly City BART station. As of March 2020, this building is 91 percent occupied with 43,000 square feet. available for lease at an asking rate of $4.65 per square foot per month on a full-service basis. This building was part of a significant redevelopment project, Pacific Plaza, by the City of Daly City. Pacific Plaza included land acquisition and sale to a developer at a cost less than the City's cost for the land to create a first-class office building in Daly City.

Situated off Interstate 280 and adjacent to the Daly City BART Station, the building offers large floor plates, views, and 1,753 parking spaces. The multi-tenant building is anchored by the global headquarters of Genesys, a contact center technology provider (with jobs reported in the range of 250 to 499 in Daly City). Other tenants include Kome Japanese Seafood & Grill Buffet, Bank of America, Subway and Satellite Healthcare. This was developed as a mixed-use retail and office investment including a retail and multi-plex movie theater. This property sold in 2018 for $114.5 million, or $299 per square foot. a cost much less than replacement costs (currently over $800 per square foot for Type I construction) reflecting both the need to renovate and the separation of the retail and office projects. This sale also indicates how a Class A office property has struggled in one of the City's best locations near a BART Station, strongly suggesting that office at the Site would be extremely difficult to realize.

Other Development Trends in Daly City

Daly City is experiencing real estate development in sectors other than office. Retail center expansions and several new hotels have been approved in the last several years. Daly City has also seen a series of residential projects, many with over 300 units, under construction,

[1] CoStar shows the Serramonte Business Center, at 455 Hickey Boulevard as Class A. BAE's assessment is that this building is Class B due to the location and quality of improvements. The building was originally built in 1982 as a single user building for First Nationwide Bank data processing functions which relocated from Daly City in 1990.

including the JUHSD project adjacent to the Site and another 2,300 units approved by the City but not yet under construction. Serramonte Plaza received City approvals in 2018 to build 65,000 square feet of medical office buildings as part of master plan upgrade for the entire center. The owner has developed the first phase of its retail expansion and has second phase under development but has not yet moved forward with the office portions of the project. It should be noted that in today's market, many medical providers prefer locations in shopping centers since they offer access and visibility on high traffic arterials which would give the Serramonte Plaza a decided advantage over the JUHSD site for this use.

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National and Regional Office Trends

Office Trends in the 1980s

During the 1980s, the national trend was for new office development to locate in suburban office parks designed for ease of auto accessibility in contrast to the historic trend to concentrate office development in Central Business District. The preferred suburban location was close to residential neighborhoods with high-end executive housing and direct access to major freeways and highways. Buildings were primarily two to three stories and situated in the center of large surface parking fields. In the Bay Area, large suburban office parks were constructed in Marin County, South San Francisco, Brisbane, Walnut Creek, San Ramon, Pleasanton, Concord, Mountain View, Sunnyvale, Santa Clara, Redwood City, San Jose, and elsewhere along the Highway 101, Interstate 680, and Interstate 580 corridors.

Even at that time, not all suburban locations were suitable for office development. In an office market study prepared in 1991 for San Mateo County, the City of Daly City, and the San Mateo Transit District as part of the BART Colma Station Specific Plan (adopted in 1994), BAE found that demand for Class A office space in the vicinity of the Colma BART Station would be weak and that land designated for new Class A office space could be undeveloped between ten and twenty years given location factors and then-market conditions[2]. In fact, the SamTrans Park and Ride site at the Colma Station, entitled in 1993 for over 200,000 square feet of office, remains undeveloped in 2020 and is under consideration for residential uses.

San Francisco, which had previously been the locus of corporate offices, saw increasing rents and new restrictions on office development in the 1980s. Suburban office development followed the labor force as corporations moved out of San Francisco (e.g. Chevron to Bishop Ranch) and new tech companies created identity campuses (e.g. Autodesk in Marin, Sun Microsystems in Menlo Park) in suburban locations. Universities also were a driver of development, in particular Stanford Industrial park which is home to many technology companies.

At the time that the Serramonte Del Rey site was planned as an apartment and office campus, the developer was targeting similar office users to those drawn to the East Bay office parks, however there was no development interest beyond the first medical office building at the Serramonte Del Ray site and Phase II office development never materialized. The project site was not as competitive at attracting office uses as the substantially larger scale sites in the Eastbay with their more favorable development environments, including better weather and better freeway access to a large pool of white-collar and executive labor. During this same period, subsidies were required to develop and sustain the two Class A office projects located near the Daly City BART station in the 1980s.

[2] See County of San Mateo, City of Daly City, San Mateo County Transit District, *Office Market Feasibility Study: Colma BART Station Specific Plan/EIR*, prepared by BAE Urban Economics, October 1991.

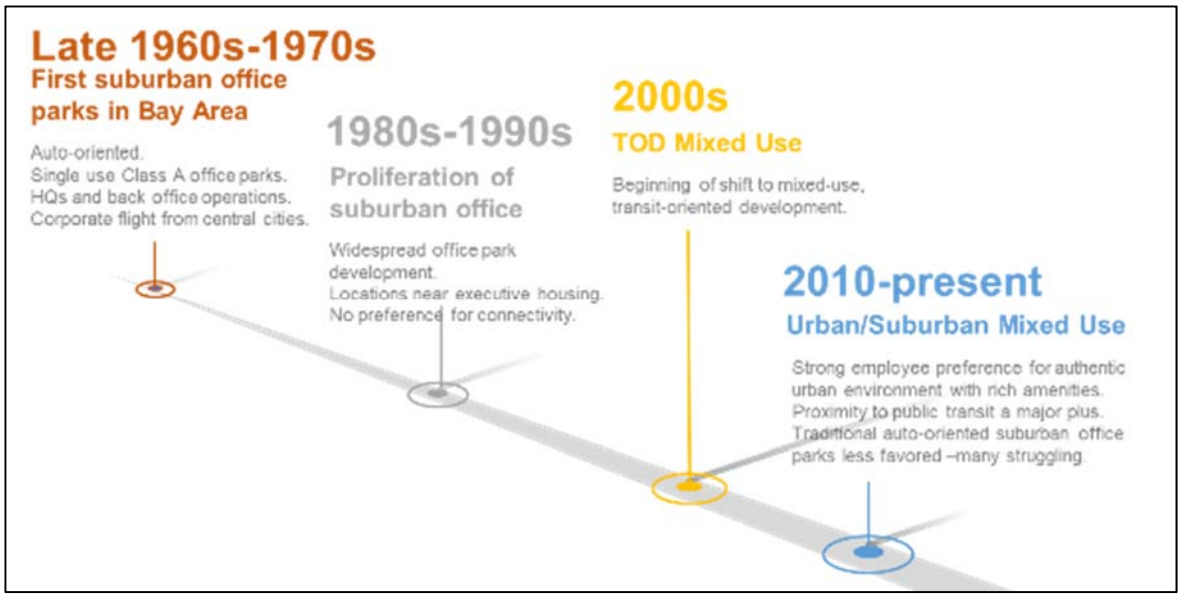
Current Office Market Trends

Since the 1980s and 1990s, the national office market has undergone a remarkable transformation that has resulted in many suburban office parks struggling to retain tenants and maintain rents commensurate with Class A properties. Driving these changes to the office sector was a shift in corporate location preferences, employee lifestyle preferences, and workspace design. Office workers increasingly demonstrate a preference for workplace locations that offer proximity to public transportation, bicycle and pedestrian access, attractive retail and service offerings, and entertainment options. In response to this shift in preferences among workers, companies are seeking office locations that offer urban-style amenities rather than traditional, auto-oriented suburban office parks that offer fewer transit options and urban lifestyle amenities.

Bay Area Reflects National Office Trends

These trends can be observed in the Bay Area, especially where San Francisco and San Jose have seen intensification of office development in the last decade. Between those two regional centers, new office development is clustering along the Highway 101 and Caltrain corridors from San Francisco's Mission Bay district to downtown San Jose. The Highway 101 corridor and parallel Caltrain line together have a strong gravitational pull for technology, finance, and life-science businesses. New office deliveries and office properties with the highest rents are typically located in this corridor. Many Peninsula cities have downtown Caltrain stops, have retained their authentic town character and offer retail and service amenities in a walkable setting.

Figure 3 San Francisco Bay Area Office Development Trends



Source: BAE, 2020.

San Francisco Peninsula/San Mateo County Class A Office Trends

Genentech's choice of South San Francisco in the 1970s spurred the development of one of the largest office/R&D markets outside of the region's core cities of San Francisco, San Jose, and Oakland. Business location decisions throughout the two most recent economic expansions have transformed the Highway 101 Corridor in San Mateo County with major employment centers emerging with clusters of Class A office and life-science development, in Brisbane, Burlingame, Foster City, San Bruno, San Mateo, and Redwood City. Connecting the San Francisco and San Jose economies, Caltrain stations have emerged as attractive locations for new Class A office and life-science development. Peninsula cities are building up, near transit stations, creating density of jobs and housing opportunities.

The power and pull of this corridor can be seen by looking at existing inventory, recently completed construction, projects currently under construction, and what is now on the drawing boards (e.g., planned and proposed projects):

- **Existing Office/R&D Inventory.** There currently a base of nearly 24 million square feet of office/R&D space in San Mateo County with 7.2 million square feet of this inventory in North San Mateo County, as shown in Table 2 and Figure 4. Just about 80 percent of North County's inventory is in South San Francisco.

- **Recently Constructed Office/R&D.** Over the past nine years, approximately 1.6 million square feet of office/R&D has been constructed in Northern San Mateo County and this figure will rise by another 4.0 million square feet when projects currently under construction are completed, as seen in Table 2 and Figures 4 and 5.

- **Planned and Proposed Office/R&D.** Over 12 million square feet of new Class A office/R&D is planned or proposed in North County, accounting for over half of all planned and proposed projects in San Mateo County (23.2 million square feet).

Looking forward, Hunters Point, Candlestick Park, Brisbane, South San Francisco, and San Carlos each have significant unbuilt, entitled properties for additional office and life-science uses in large scale office park settings that will continue to out-complete locations within Daly City. In total, these sites include 30 million square feet either under construction as of the end of 2019 or in the development pipeline, shown in Figure 6.

Table 2 San Francisco Peninsula/San Mateo County Office Market

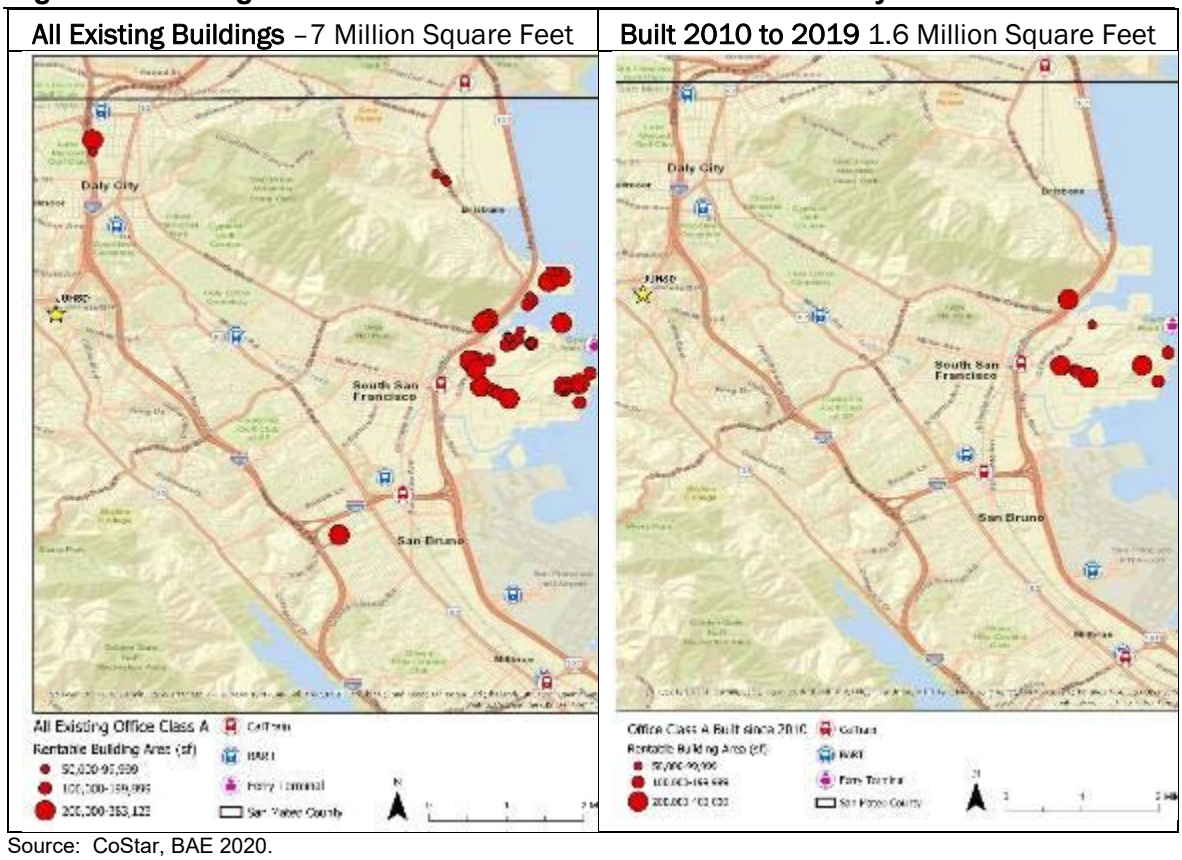
Millions of Building Square Feet

	Existing 12/2019	Under Construction	Planned/ Proposed	
Daly City	0.4	-	-	
Milbrae	-	0.2	0.2	
San Bruno	0.3	-	2.4	
South San Francisco	5.7	3.3	3.0	(a)
Brisbane	0.8	0.6	6.5	
North San Mateo County	7.2	4.0	12.2	
Central San Mateo County (b)	10.6	1.4	0.6	
South San Mateo County (c)	6.1	1.6	11.0	
	13.3	5.7	23.2	
Southern San Francisco (d)			2.8	
Total	23.9	7.1	26.6	

(a) Genetech's proposed master plan change to allow 4 million additional square feet is not included.
(b) includes City of Burlingame, City of San Mateo, and the Foster City/Redwood City Shores submarket.
(c) Includes City of Menlo Park, City of Redwood City, and the Belmont/San Carlos submarket.
(d) San Francisco has approved projects at Candlestick and Hunters Point that allow office and R&D product.

Source: CoStar, local planning departments, BAE 2020.

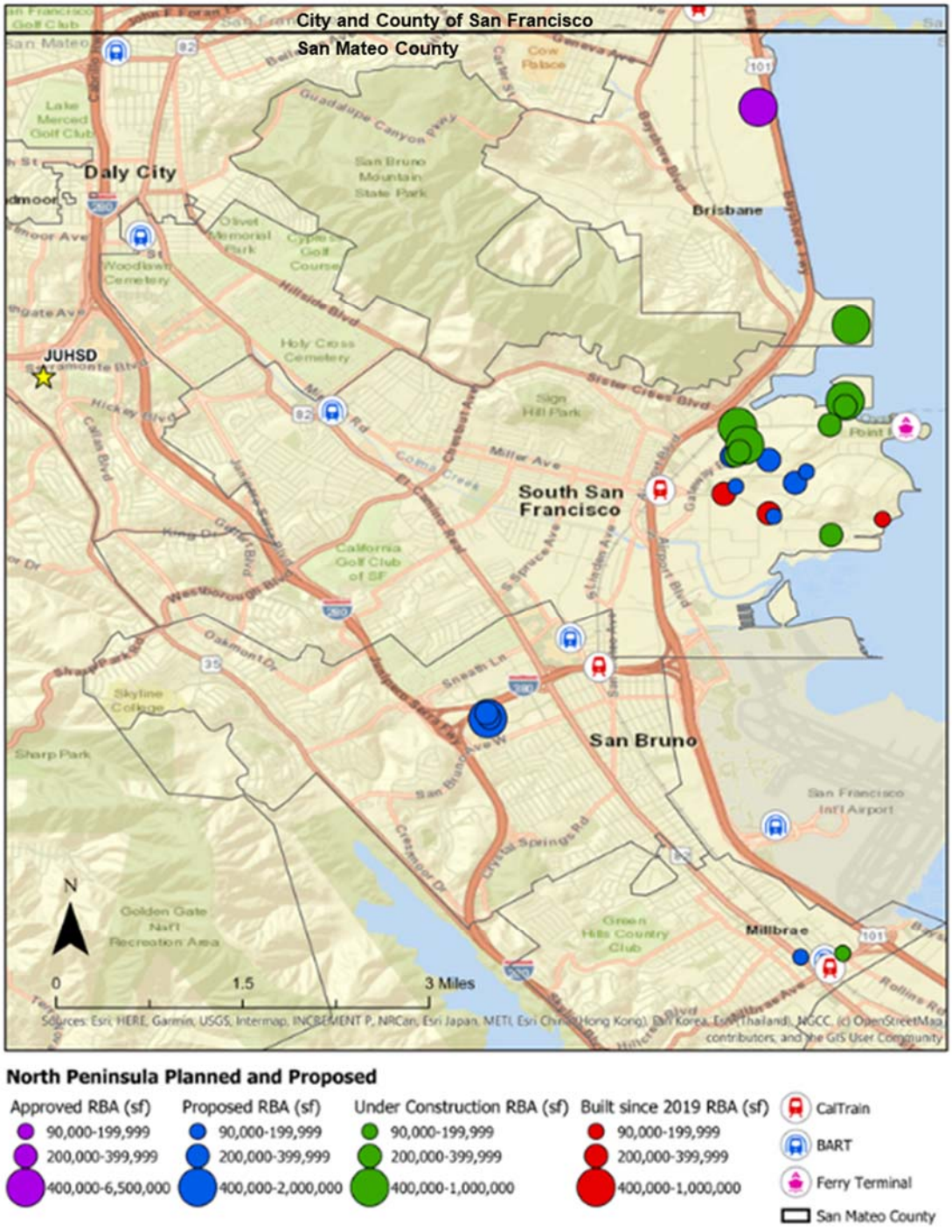
Figure 4: Existing Class A Office in Northern San Mateo County



Source: CoStar, BAE 2020.

Figure 5: Class A Office Projects Under Construction, Approved and Proposed

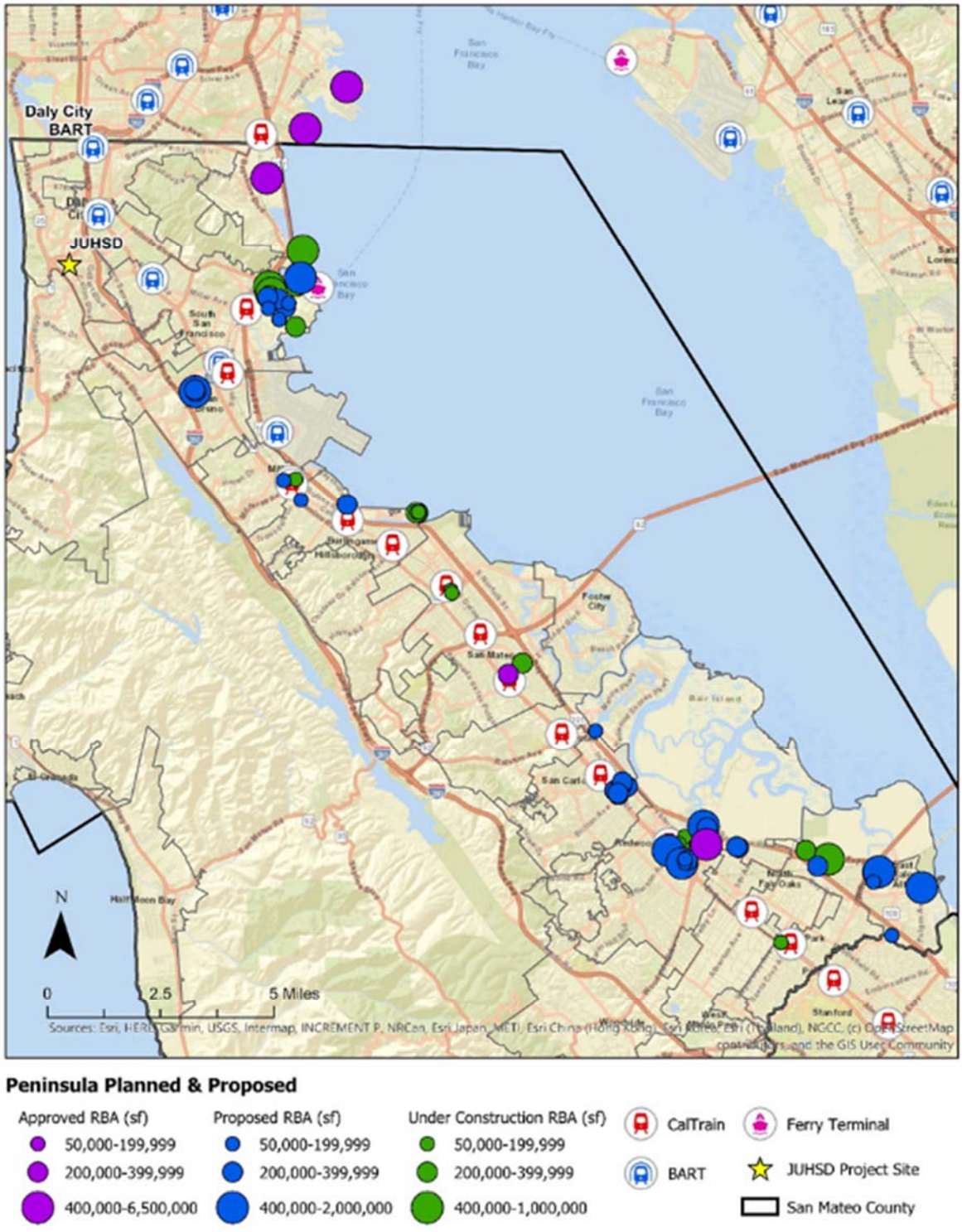
Northern San Mateo County, 16 Million square feet



Source: CoStar, BAE 2020

Figure 6: Class A Office Projects Under Construction, Approved and Proposed

San Mateo County, Candlestick, and Hunter's Point, 30 Million square feet



Source: CoStar, BAE 2020

Case Studies – Traditional Suburban vs Suburban TOD and Urban Environments

To better understand why the Serramonte Del Rey site has failed to realize the 1985 plan of corporate office campus, BAE reviewed six office development case studies. Three are suburban, single-use office parks built when the 1985 Precise Plan was conceived. In contrast, BAE reviewed three San Mateo County environments that are currently attracting new office development and rapidly urbanizing around transit. Appendix B presents discussion of all six markets and this review substantiates BAE's assessment that office development is not supported at the Site.

Suburban Environments

The suburban, single use office parks reviewed were Shadelands in Walnut Creek, Marina Village in Alameda, and the Northgate district in San Rafael. Figure 7 summarizes the case studies.

Figure 7 Summary of Traditional Suburban Office Park Case Studies

Many Office Parks built in the 1970s and 1980s have been struggling	
Shadelands, Walnut Creek	240 acres with 1.3 million sq. ft. on Ygnacio Valley Road. Over two miles from Pleasant Hill and Walnut Creek BART stations. Originally considered Class A space but inventory is now dated and considered Class B and Class C space.
	No new office development since 2001.
Northgate District, San Rafael	Approximately 731,000 sq. ft. on 80 acres near Mall at Northgate. One Class A property with the remainder Class B and C. SMART train station within 05. mile but pedestrian access poor. Tenants prefer downtown San Rafael to south.
	No new office development since 2004.
Marina Village Office Park, Alameda	1.1million sq. ft. over 200 acres; developed in 1980s and 1990s. Ferry terminal with service to San Francisco and Jack London Sq. 1.5 miles to west. No pedestrian access to Caltrain or BART stations on Oakland side of estuary. Originally Class A space but now all properties considered Class B and C. Office users view lack of transit options as negative.
	No new office development since 2001.

Source: BAE, 2020.

Several key observations can be made from the suburban office park case studies:

- All three suburban office parks had significantly more site acreage than the JUHSD Site, which supported an initial critical mass of office space when developed.

- Developers in all three parks developed Class A office space. The market now classifies all but two of the office properties as Class B or Class C, indicating that either the design and functionality of the buildings fell out of favor with tenants or that

property owners did not find it financially feasible to reinvest in their properties to maintain a Class A product.

- Office development was automobile centric with surface parking lots located around office buildings. All three have inferior access to public transportation and office employees generally have to drive to patronize retail and services in the area, which is counter to the current national trend of locating new office in urban, transit-oriented locations.

- Rent growth over the past five years has been less than ten percent across the three office parks, a rate of growth that significantly lower than rental increases for properties in stronger markets such as the downtowns of Walnut Creek, Oakland, and San Rafael and the Highway 101 corridor on the Peninsula in San Mateo County.

- The three case study office parks did not experience any new office development over close to two business cycles, including the recent 10-year recovery from the Great Recession, reflecting a shift in preference by office tenants to other locations with more amenities and access to public transit and where prevailing rents support new construction which provides highly functional Class A product.

- Overall, the 1985 Precise Plan for the Site was formulated to permit an office park with the same locational profile as these traditional suburban office parks that are currently struggling in the market.

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San Mateo County Suburban TOD and Urban Office Development

Three San Mateo County transit-oriented locations were considered as a contrast to the office envisioned with the Serramonte del Rey Precise Plan. These three locations are downtown Redwood City, San Mateo near the Hillsdale and Hayward Park Caltrain Stations, and South San Francisco's biotech/technology campuses. The success of these markets is summarized in Figure 8.

Figure 8: Summary of Suburban TOD and Urban Office Development

Suburban TOD and Urban Class A Office is strongly performing	
Downtown Redwood City	Guided by a downtown plan adopted in 2011 and the strong regional economy, Redwood City has more than tripled the Class A space in its downtown and attracted technology companies. New housing, retail, and improved public spaces has created a vibrant employment center within walking distance of the Caltrain station. At the end of 2019, there was no Class A vacancy.
	740,000 square feet in place, 178,000 under construction and 1.8 million in review.
Bay Meadows and El Camino &92 San Mateo	Bay Meadows conversion of 180+acres of the former racetrack occurred in two phases and has created a mixed-use district walking distance to the Hillsdale Caltrain Station. In 2001, Franklin Templeton built at 568,000 square foot headquarters and until 2015 was the only office use. Phase 2 included 3 completed buildings with 572,000 square feet and additional building under construction Office parks near Hayward Park Station have seen new investment in part following the addition of TOD housing, new office buildings, and upgrades to 1980s buildings to add amenities.
	2.6 million square feet in place, 200,000 under construction and 214,000 planned.
South San Francisco, Biotech Cluster	Over 500 acres are developed as 15 campus for lifescience/biotech companies. Major projects underway by REITs to meet growing demand either as built to suit or pre-leased before construction completion. New projects demolishing older low-rise projects with projects as tall as 10 stories. While mostly not TOD, there is expanding transit access with improved Caltrain Station, Ferry Terminal and extensive employee shuttle systems. Genentech has proposed almost doubling its campus from 4.9 to 9 million square feet, growth not yet in the proposed projects shown earlier in this memo.
	5.7 million square feet in place, 3.0 million under construction and 3.0 million planned

Source: BAE, 2020.

BAE's overall findings related to the review of Suburban TOD and urban office developments in San Mateo County are:

- Competition for workers drives companies to prioritize locating Class A office in urban, transit-oriented locations. Millennial and Generation Z workers do not typically want to drive and prefer public transit or other alternative forms of mobility (walking, biking, and ridesharing).

- A significant concentration of office space and business activity is needed in one location to create agglomeration economics needed to create an industrial cluster such as bio-tech, which requires much larger land area than the 22 acres available at the JUSHD site.

- New development is occurring at densities significantly above the classic one-to-three story suburban office. Buildings built between 2015 and 2019 have ranged from four to ten stories in height and the proposed projects continue, and in some cases accelerate, the trend to mid-rise buildings. Bay Meadows in San Mateo has termed itself "mid-urban," a position between central business district urban and a traditional suburban campus.

- Increasing highway congestion has made transit access and neighboring housing a significant priority for businesses.

- Redwood City and the San Mateo locations include significant place-making with significant housing and retail creating a 24-7 destination.

Conclusion Market Feasibility of Class A Office at the Site

After review of the overall office development trends, Daly City office building performance, and the recent and planned office development in sites competitive with JUHSD's Serramonte Del Rey site, BAE concludes that it is not suitable for office development. Since 1985, developers have chosen to invest in other locations including cases where significant entitlement process were required.

Today, office market users seek the following location attributes:

- Walkable to high-performing transit including BART and Caltrain.
- Accessible to highways and offering visible locations for branding.
- Authentic locations with retail, restaurants, and entertainment fostering an urbane experience.
- Technology and biotech companies tend to cluster together. It takes significant place making, such as the Bay Meadows experience to create a new location.
- Locational factors are critical to attracting talent so that companies are willing to pay premium rents for locations that meet their workforce priorities.

As the costs of development are similar across San Francisco Peninsula locations, developers will build where they anticipate the highest rents and the least risk to lease up a project. Developers, seeking to meet the end user requirements, also seek out either sites that are big enough to create a vibrant mixed-use environment or infill sites situated within an already active business district. As Redwood City's downtown plan and the Bay Meadows plan

demonstrate, cities can create entitlement frameworks to foster office development, yet the underlying economic growth and user location preferences drive the timing. The Serramonte Del Rey Precise Plan experience shows that entitling office uses is not sufficient to draw development if the site does not meet current user requirements.

Across the greater market, there are substantial development opportunities that will continue to out compete the JUHSD site, including Daly City sites near or adjacent to the Daly City BART Station, including sites near BART in Daly City.

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Fiscal Analysis of Alternative Residential Uses

An alternative use for the Site is residential and this section of the report addresses the fiscal impact of residential uses in a setting such as Daly City.

New residential development has traditionally been viewed by many local land use decision-makers as a fiscal negative (e.g., not generating sufficient new general fund tax revenue to cover incremental costs). However, a growing body of fiscal impact analyses ("FIAs") for projects in the Bay Area demonstrate that new residential development can have a significant net positive fiscal impact.

Daly City has recently analyzed three office projects for their impact on local tax revenues and service requirements. BAE reviewed these three studies and adjusted to remove any tax revenues from proposed retail to identify the portion of the fiscal impact due to the housing use.

Westlake Shopping Center – 179 Units Rental Housing
The center owner, Kimco Realty Corporation, received entitlements in 2017 to redevelop a portion of the Westlake Shopping Center to mixed use with 35,458 square feet of replacement retail and 179 units of rental apartments. With a 1.95-acre site, this is a density of 92 units per acre. The FIA was prepared by the developer at the request of the City and the FIA indicates a positive fiscal impact to the general fund, totaling approximately $163,900 annually in 2017 dollars from the residential portions of the project, $916 per unit per year.

City Ventures, Serra Station – 75 Townhomes
The second project is a proposed townhome and retail development with a 35,000 square foot retail program at 3301 Junipero Serra Boulevard being undertaken by City Ventures and approved in late 2019. The project, on 3.92 acres, results in a density of 19 units per acre. The FIA was prepared by Economic Planning Systems, Inc. in 2017 and indicates a positive fiscal impact to the general fund of approximately $164,700 annually from the residential components of the project, $2,196 per unit per year.

Equity Residential, 6401 Mission – 170 units of Rental Housing
The City is currently finalizing a project with Equity Residential to build apartments on a 0.36-acre site, at a density of 472 units per acre in a ten-story[3]. A fiscal study prepared by ALH Urban Economics found a fiscal benefit of the project of $183,400 in 2019 dollars, $1,079 per unit per year.

[3] The calculation of density does not include the land area for a garage constructed in an earlier phase that the proposed project will connect to.

FIA Implications for New Residential Projects in Daly City

- The three FIA analyses prepared recently for Daly City projects all indicate that residential development at the scale and density of in-fill development projects, such as what is being considered for the JUHSD site, can yield net positive impacts.

- New residential development injects additional retail spending power into the city that can support its existing and expanded retail centers and corridors.

- Daly City has well-performing retail centers such as the Westgate Mall and Serramonte Plaza with a wide offering of retail stores that draw shoppers from both inside and outside the city. However, the City's retail sector faces continued pressure from e-commerce and the uncertain impacts of the current Covid-19 pandemic.

- Daly City can support the long-term sustainability of these centers by adding new residents. Each new resident, from which a higher percent of spending can be captured locally, netting more retail sales than under a situation faced by many other cities where new residents chose to go outside the city for a significant portion of their shopping.

APPENDICES

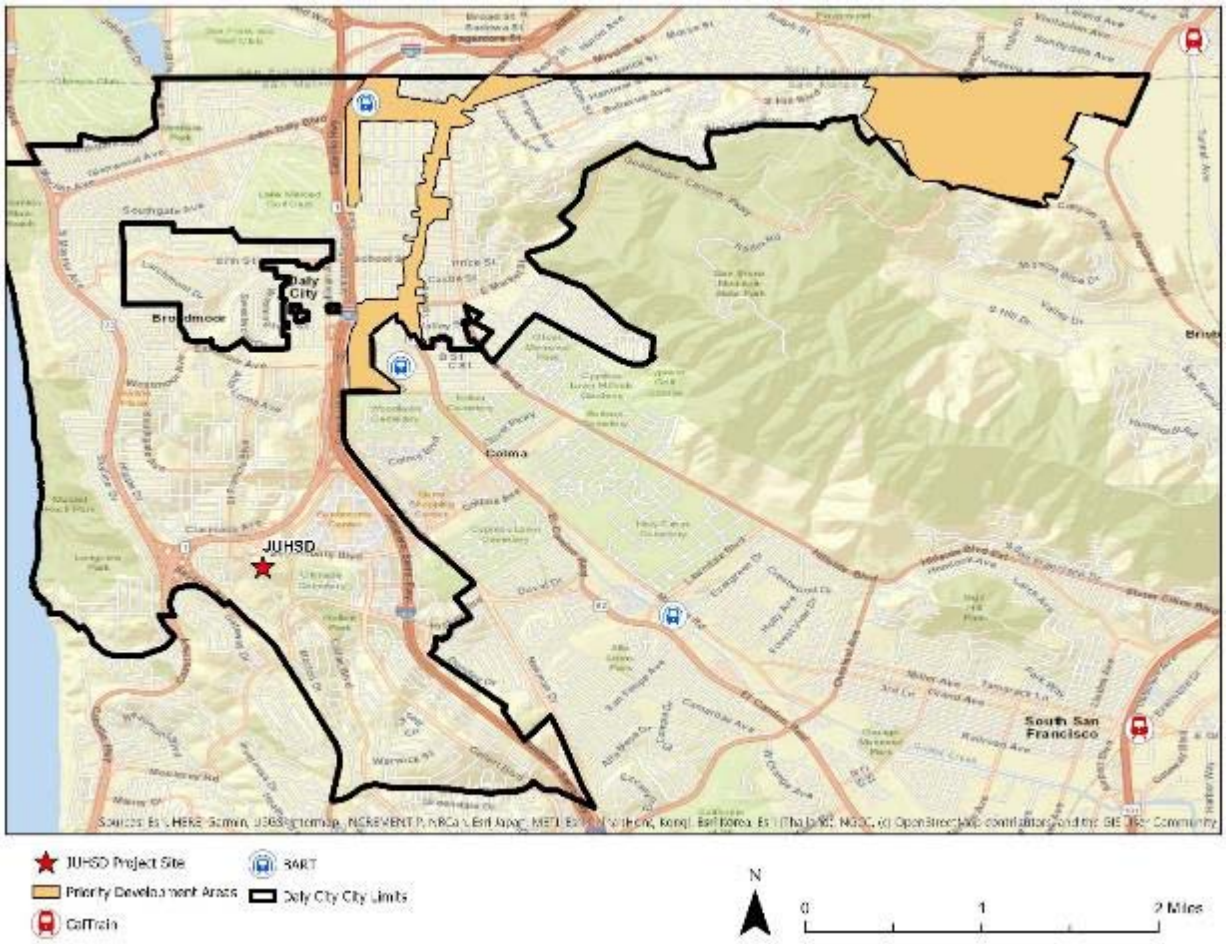
Appendix A: Daly City Office Opportunity Sites
Appendix B: Office Development Case Studies

APPENDIX A – DALY CITY OFFICE DEVELOPMENT OPPORTUNITY SITES

As has been the case for many years, the incorporated area within the Daly City limits is almost completely built out. According to a vacant land analysis in the City's Housing Element, as few as 25 acres of privately-owned vacant or underutilized land remain in the City, with most of those being most appropriate for housing uses. BAE sought to identify the potential sites for office development in Daly City likely to be successful in attracting developer interest.

All cities in the San Francisco Bay Area were asked to designate Priority Development Areas (PDAs). These PDAs are transit-oriented, infill development opportunity areas within existing communities that are expected to host the majority of future development. Daly City has two such areas, Bayshore Neighborhood and the Mission BART Corridor, as shown below. Note that the Serramonte Del Rey site is not in a PDA due to its locational attributes.

Figure 9 Daly City Priority Development areas



Several sites were transferred to the City from its former redevelopment agency that could offer opportunities for office development that are much closer to BART and better meet the requirements of office users. These include:

Pacific Plaza Phase II and III The Pacific Plaza project is adjacent to Daly City BART. This site is 2.36 acres adjacent to the 2001 Junipero Serra Building. Plans are approved for 270,000 square feet of additional office space and a 200+ room full-service hotel. The City is currently negotiating with developers for these sites for a hotel, an expansion of Duggan Mortuary, and a automobile dealership.

Cow Palace and neighboring sites The City's General Plan traffic modeling analyzed combining the approximately 70-acre site with 12 acres of adjacent City owned land and 11 acres privately owned property. The City has assumed the ultimate buildout of the three aforementioned properties to include 1,700 new dwelling units in a higher density format and 300,000 square feet of retail/office commercial in a multi-story) format.

SamTrans Park and Ride Lot (3451 Junipero Serra Boulevard). This approximately 12.8-acre site was analyzed as 215,000 square feet of office in the General Plan traffic analysis. However, it is also under discussion for a residential transit-oriented development, high density project. This property is owned by the San Mateo County Transit District and consists of an existing parking lot that provides daily paid parking for use by patrons to the Colma BART Station.

Daly City BART Station Delong Street Parking Lot (500 John Daly Boulevard). This property is owned by the San Francisco Bay Area Rapid Transit District (BART) and consists of a functioning 263-space parking lot on an 8-acre site just east of the Daly City BART Station. The Daly City BART station area plan envisions residential as the TOD project for this site.

APPENDIX B – OFFICE DEVELOPMENT CASE STUDIES

To assess the Serramonte Del Ray site in the regional context, BAE reviewed the office markets in six other suburban locations to garner insights from both older, traditional suburban office parks and from newer suburban TOD and urban office environments. Three San Francisco Peninsula office markets, competitive with Daly City that have been strongly performing are discussed below. Three San Francisco Bay area suburban office parks, similar to the initial vision of Serramonte Del Rey, that have not been successful are also reviewed. These cases studies provide perspective to the office development prospects for the subject site potential for a 20+ acre office campus.

Suburban TOD and Urban San Mateo County Class A Office Submarkets

Downtown Redwood City

In 2011, Redwood City adopted the Downtown Precise Plan creating development parameters for 500,000 square feet of new office and 2,500 housing units as well as hotel and retail development. That plan, and the strong economy, has spurred significant office development as shown below. The City first invested in civic improvements to create a new public space, Courtyard Square, and to entitle the plan that allowed for development to proceed. Prior to the implementation of this plan, the last office building built in downtown Redwood City was in 2001. Downtown Redwood City includes historic office and commercial buildings, a theater, and retail offering a walkable, urban experience for downtown office workers.

In 2015, Kilroy Development completed Crossing 900, a two building, 347,000 square foot project on an almost 3-acre site acquired from the City. Box, Inc., a technology company leased the complex. Three additional buildings were completed in 2018, totaling 189,000 square feet and are fully leased. The City is considering recently submitted plans to redevelop Redwood City's Sequoia Station, that include one 17-story office building, three 10-story buildings, two 8-story buildings, and one 7-story building totaling 1,635,000 square feet. If the requisite General Plan and height limit increases are approved, the 17-story building would be the tallest building within Redwood City and the project would more than double the Class A office inventory.

Over the last five years, rents for Class A office space in downtown Redwood City have increased by 42 percent, from $6 monthly per square foot to $8.66. Redwood City now has office rents that can rival Menlo Park as the highest in the County. To note, about 1½ miles from downtown Redwood City, Stanford University has developed the first phase of its 35 acre, Redwood City Campus with four office buildings totaling 570,000 square feet, a 1,057-space parking structure and has plans to grow that facility to 1.5 million square feet and 2,700 employees.

Figure 10: Class A Office Redwood City

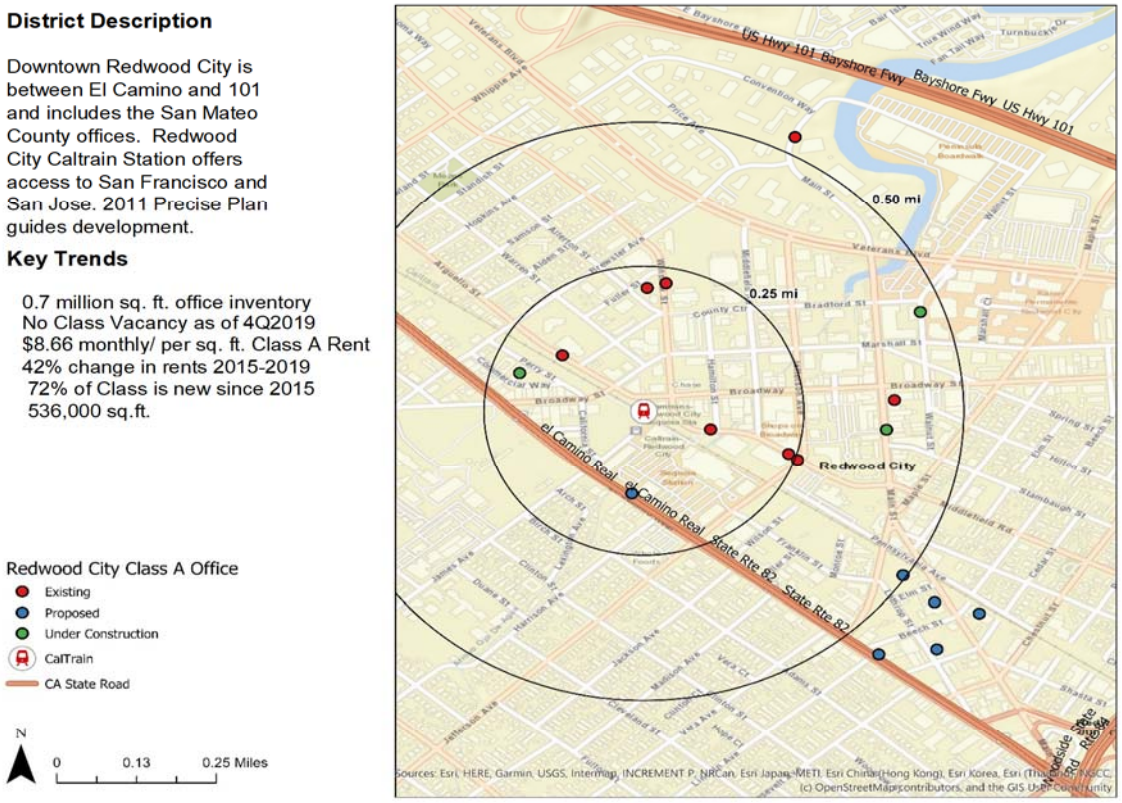
Redwood City, CA

District Description

Downtown Redwood City is between El Camino and 101 and includes the San Mateo County offices. Redwood City Caltrain Station offers access to San Francisco and San Jose. 2011 Precise Plan guides development.

Key Trends

0.7 million sq. ft. office inventory
No Class Vacancy as of 4Q2019
$8.66 monthly/ per sq. ft. Class A Rent
42% change in rents 2015-2019
72% of Class is new since 2015
536,000 sq.ft.



Office Market Performance Metrics

Office Class A Summary, Q4 2019	Redwood City Downtown
Number of Buildings	8
Inventory (sf)	744,361
Vacant (sf)	0
Vacancy Rate	0.0%
Avg Gross Asking Rent (psf) (a)	$8.66
Under Construction, Q4 2019	
Buildings Under Construction	3
Under Construction Inventory (sf)	178,268
New Deliveries (sf), Q1 2015 - Q4 2019	536,485

Average Office Class A Rents (PSF), 2015 - 2019	
Year	Redwood City Downtown
2015 (Q4) (a)	$6.09
2016 (Q4)	$7.12
2017 (Q4)	$7.68
2018 (Q4)	$8.49
2019 (Q4)	$8.66
% Change 2015-2019	42.2%

Sources: CoStar, 2020; BAE, 2020.

Note:
(a) Asking rents reflect direct gross leases. 4Q2015 rent is a sublease rent, as there were not direct leases, that quarter
Sources: CoStar, 2020; BAE, 2020.

Bay Meadows and Highway 92 & El Camino This case study focuses on in two areas of San Mateo adjacent to the Hayward Park and Hillsdale Train stations: Bay Meadows and the office parks neighboring the junction of Highway 101 and 92 and El Camino Real. These two neighboring areas represent an interesting comparison. Bay Meadows has been the creation of a new mixed-use district while the area's older, suburban parks, have transitioned to be more transit and technology tenant focused. The City adopted the San Mateo Rail Corridor Transit Oriented Development Plan in 2005 to guide development in the area and to allow for increased density in a largely built out city. In total, this area now has 2.7 million square feet

of Class A office, an increase of 1.1 million square feet since 2015 with an additional 210,000 square feet under construction and 367,000 square feet planned. At the end of 2019, 3.3 percent of the Class A space was vacant.

Bay Meadows - 160+ Acres. The project has been built in phases, with the first phase completed in 2003. The project consists of 82 acres on the former practice track including: an 83,000 square foot neighborhood shopping center anchored by Whole Foods and Crunch fitness, 250,000 square feet of office, 575 apartments, and Franklin Templeton Investments headquarters campus, with 570,000 square feet built by 2003. In 2019, two additional buildings totaling 245,000 square feet completed the build out. When developed in 2001, the Franklin Templeton campus was isolated from other development, as a drive-to, suburban office park.
The second phase of Bay Meadows on 83 acres includes: 1,145 residential units mostly at townhome density, 767,000 square feet of office space, and 93,000 square feet of retail and restaurant space. The project includes a private high school that opened in 2014 as one of the first buildings as well as three public parks. The project includes five office buildings, designed for technology companies as single user buildings. Survey Monkey took the first building in 2015. The strong market response to the first buildings at Bay meadows lead the developer to increase the size of the two commercial buildings from 92,000 to 184,000 for Station 1 and 98,000 to 183,000 for Station 5. CoStar reports a monthly asking rent of $6.95 per square foot for the yet to be built Station 5 at Bay Meadows, again reflecting the strong market.

Highway 92 and El Camino. Roughly one million square feet of Class A office was in place in 2003 in the general area near the Hayward Park Caltrain station and the junction of Highway 92 and 101 as well as along El Camino Real. Since 2015, 300,000 square feet have been added and another 400,000 significantly upgraded, resulting in a desirable office location with rents doubling in the last decade. In 2017, Beacon Capital Partners acquired 1825, 1855 and 1875 Grant, mid-rise office buildings built in the mid-1980s and renovated to meet current tenant requirements including adding amenities. While having the visible, auto-oriented location at 101 and 92 and suburban parking area, the property was marketed based on its access to Caltrain. This project, “The Crossroads,” traded in early 2019 for $662 per square foot.

In 2017, Hines completed two new Class A buildings at 400 and 450 Concar totaling 305,000 square feet adding to the existing 200,000 square feet of office in the center. Centrally located near the intersection of U.S. Hwy. 101 and Interstate 92, the highly visible property is directly adjacent to the Hayward Park Caltrain station. In early 2019, 400/450 Concar sold for $1,050 per square foot. Transitioning old commercial centers to apartments has enhanced the creation of a pedestrian scale neighborhood. In 2017, Station Park Green, a TOD project with 35,000 square feet of new retail and 599 rental housing units to the corner of Concar & Delaware replaced former Kmart on the 12-acre site supporting the overall transformation of

this area. The City is considering a second 700+ unit residential project on a 14-acre shopping center in this area.

Figure 11: Class A Office San Mateo – Bay Meadows and El Camino & 92 Area

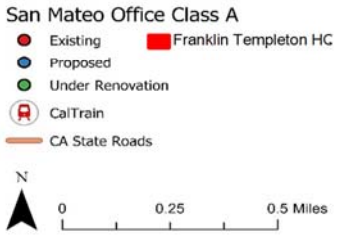
San Mateo, CA -- Bay Meadows and El Camino & 92

Market Description

Proximity to the Hayward Park and Hillsdale Caltrain stations has fostered office development. Bay Meadows project has created new office complex with significant amenties and access to Caltrain as well as housing and retail. Office parks along 92 have seen renovation and new buildings with the addition of TOD housing.

Key Trends

2.7 million sq. ft. office inventory
3.3% Class A Vacancy as of 4Q2019
$8.66 monthly/ per sq. ft. Class A Rent
5.9% change in rents 2015-2019
40% of Class A is new since 2015
1.1 million sq.ft. built since 2015



Office Market Performance Metrics

Office Class A Summary, Q4 2019	Bay Meadows/ El Caminio & 92
Number of Buildings	21
Inventory (sf)	2,667,704
Vacant (sf)	88,121
Vacancy Rate	3.3%
Avg Gross Asking Rent (psf) (a)	$5.37
Under Construction, Q4 2019	
Buildings Under Construction	4
Under Construction Inventory (sf)	209,860
New Deliveries (sf), Q1 2015 - Q4 2019	1,122,745

Average Office Class A Rents (PSF), 2015 - 2019	
Year	Bay Meadows/ El Caminio & 92
2015 (Q4)	$5.07
2016 (Q4)	$4.62
2017 (Q4)	$5.21
2018 (Q4)	$5.18
2019 (Q4)	$5.37
% Change 2015-2019	5.9%

Sources: CoStar, 2020; BAE, 2020.

Note:
(a) Asking rents reflect direct gross leases. CoStar data is not complete on rents for the newly constructed buildings.
(b) CoStar data increased to include the full Franklin Templeton office campus of over 750,000 sq. ft.
Sources: CoStar, 2020; BAE, 2020.

South San Francisco, Biotech Cluster. South San Francisco's transformation to an employment center started earlier than Redwood City or San Mateo. Genetech in 1977 leased former heavy industrial space in South San Francisco and began the process of creating a new industry. The location was near research universities, medical centers, and SFO airport but separate from the residential neighborhoods to allay any concerns about this new industry. Genetech's building use is roughly equal parts office space, lab space and manufacturing. With a series of Master Plans, the City has developed land use controls to foster the growth of Genetech. Genetech has a campus of 4.9 million square feet on over 200 acres and 10,000 employees. Genetech is working with South San Francisco to increase development allowed in their campus to nine million square feet to accommodate an additional 12,000 employees.

Including Genetech, South San Francisco has over 200 biotech companies and over 11.5 million square feet of laboratory, office and manufacturing space already in operation in an area of over 500 acres, as reported by the City. South San Francisco has approved additional three million square feet of lifescience related development that will be built in the next ten years. Recent trends include demolishing older low-rise buildings to build new mid-rise buildings. While not classically transit oriented, this area has ferry access to the East Bay and access to Caltrain and BART. Employers use shuttle buses to access transit and provide commute buses for employees.

REITs are creating new campuses in South San Francisco, investing in the entitlement, infrastructure and beginning construction prior to identifying a tenant. Frequently buildings are leased during construction creating a market dynamic of substantial additions to inventory without increasing vacancy. Additionally, technology companies beyond biotech are choosing South San Francisco, some relocating from San Francisco for lower tax rates and rental rates. Campuses include amenities to create an attractive work environment and foster social connections.

Key projects include:

- BioMed Realty Trust's 1.25 million square feet Pacific Gateway campus,
- HCP Investment's 884,000 square feet Britannia Cove campus, under construction
- Alexandria's 291,000 square feet of office/R&D campuses.
- Kilroy is constructing 2.5 million square feet of office and open space adjacent to Oyster Point.

South San Francisco differs from Redwood City and San Mateo as it has not included residential uses in the core office parks as the biotech industry preferred separation from residential uses. Instead, South San Francisco has fostered additional housing in its downtown and areas neighboring the Caltrain station, with almost 700 units permitted between 2015 and 2019 and an additional 3,000 housing units in the development pipeline.

Figure 12: Class A Office/Lifescience South San Francisco

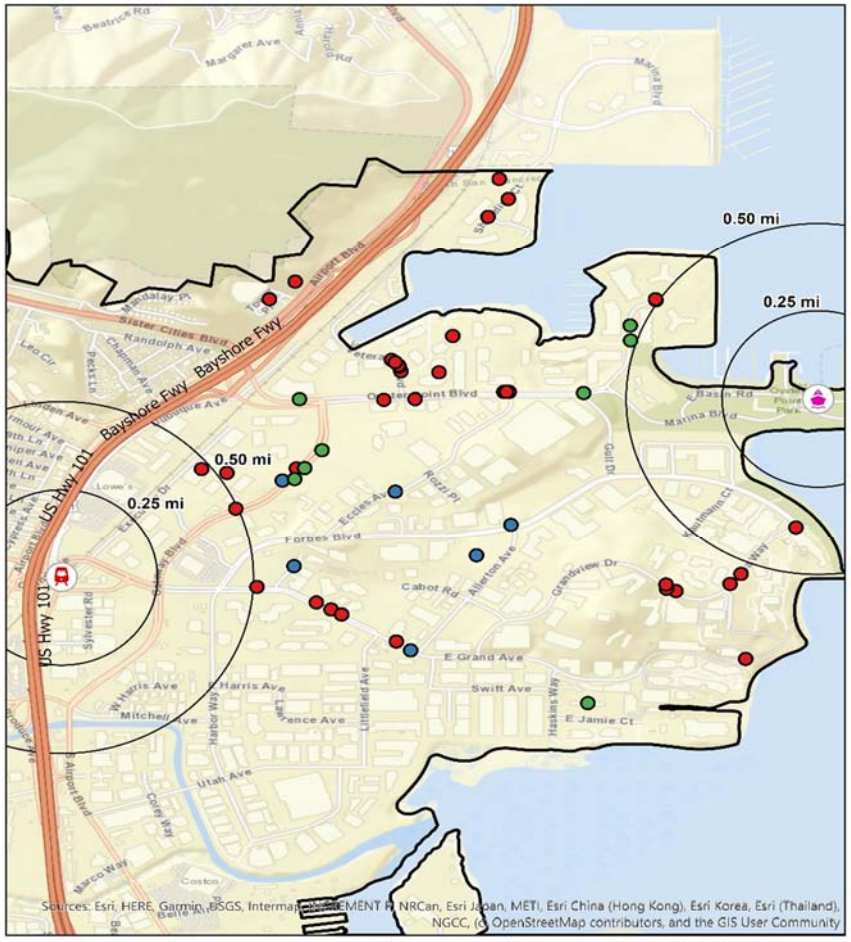
South San Francisco, CA

Market Description

Over 500 acres with 15 campus for biotech/life science and technology companies. Newer developments are mid-rise construction included two building on the west side of 101. 3 million square feet is under construction and another 3 million is proposed.

Key Trends

5.8 million sq. ft. office inventory
4.9% Vacancy as of 4Q2019
26% increase in office rents
42% change in R&D rents
51% of Class is new since 2015



South San Francisco Office Class A
Rentable Building Area >50,000 sq. ft.

- Existing
- Proposed
- Under Construction
- CalTrain
- Ferry Terminal
- CA State Roads
- South San Francisco City Limits

N

0 0.5 1 Mile

Office Class A Summary, Q4 2019 (a)	South San Francisco
Number of Buildings	33
Inventory (sf)	5,688,694
Vacant (sf)	271,162
Vacancy Rate	4.8%
Under Construction, Q4 2019	
Buildings Under Construction	7
Under Construction Inventory (sf)	2,977,728
New Deliveries (sf), Q1 2015 - Q4 2019	1,611,768

Average Office Class A Rents (PSF), 2015 - 2019 (b)		
	Class A	
Year	Office -- FS	R&D -- NNN
2015 (Q4)	$3.56	$3.50
2016 (Q4)	$4.32	$2.75
2017 (Q4)	$5.35	$4.59
2018 (Q4)	$5.07	$5.34
2019 (Q4)	$4.50	$4.99
% Change 2015-2019	26.4%	42.6%

(a) Includes Class A office buildings larger than 50,000 square feet. Biotech business are also in Class B and C buildings and R&D/industrial space; thus other metrics of the overall size of the biotech sector are larger for South San Francisco.
(b) Rents are as reported by Colliers as the CoStar database did not include sufficient information.
Sources: CoStar, 2020; BAE, 2020.

Traditional Suburban Office Parks

At the regional level, tenant preferences for proximity to transit has resulted in many traditional suburban office parks built in the 1970s, 1980s, and 1990s (without amenities and a variety of mobility options) now experiencing weak leasing and rents. BAE identified three office parks in the Bay Area that were considered Class A development when constructed and initially leased but now face challenges as less favored business locations: Shadelands Office Park in Walnut Creek, Northgate District in San Rafael, and Marina Village Office Park in Alameda.

Shadelands Office Park, Walnut Creek. This 240-acre office park with approximately 1.3 million square feet is located off of Ygnacio Valley Road. It is approximately 2.4 miles from the Pleasant Hill/Contra Costa Center BART Station and 3.0 miles from the Walnut Creek BART station. Shadelands Office Park was one of the first Class A suburban office parks developed in the Bay Area with most of its construction occurring in the 1970s and 1980s. Originally, this office park attracted a wide range of businesses and nonprofits: from sole proprietors and small businesses in professional services to large anchor corporations, such as Del Monte Foods whose headquarters is still located in Shadelands.

Over time, the office inventory in this park has become dated and is now largely considered Class B and Class C space. Only one building, 2700 Ygnacio Valley Boulevard, offering 107,146 square feet is identified as Class A and it reports a high vacancy at the end of the fourth quarter 2019 (63.4 percent). One major Shadeland's tenant, the University of California-managed U.S. Department of Energy's Joint Genome Institute, left its long-time Shadelands facility at the end of 2019 to move to the Berkeley campus to be near its faculty, scientists, and amenities. The district's tenant base is largely comprised of firms providing medical services. Overall, the district's vacancy rate is 12.1 percent which is somewhat higher than the seven to ten percent vacancy rate that typically indicates a balanced relationship of supply and demand. Tenants are attracted to the district for its low rents but rents are not high enough to justify new construction. No new office construction has occurred since 2001.

Over the past five years office rents across all three classes in Shadelands have risen by approximately 6.8 percent between the end of the fourth quarter 2015 and the end of the fourth quarter 2019, compared to an overall rise of 35.9 percent for office in the Downtown Walnut Creek generally[4]. The last reported rate for the Class A office property at 2700 Ygnacio Valley Boulevard is $2.20 monthly per square foot on a full-service basis. This is in contrast to the reported Class A rental rate of $4.27 monthly per square foot for office in downtown Walnut Creek that has a BART station and retail and service amenities.

[4] Note that a meaningful change for Class A office cannot be estimated since there is only one building in the Shadelands inventory.

Figure 13: Shadelands Office Park, Walnut Creek

Shadelands Business Park, Walnut Creek

BART
CA State Road

N
0 0.5 1 Miles

District Description

Shadelands Business Park is located in the northwestern part of Walnut Creek. It is approximately 2.4 miles from the Pleasant Hill/Contra Costa Center BART and approximately 3 miles from the Walnut Creek BART.

Key Trends

1.3 million sq. ft. office inventory
12.1% vacancy rate
$2.03 monthly/ per sq. ft. asking rent - All classes
6.8% change in rents 2015-2019
No new construction since 2001

Shadelands Business Park, Walnut Creek

	Office Building Class	
Summary, Q4 2019	**Class A**	**Classes A, B, C**
Number of Buildings	1	45
Inventory (sf)	107,146	1,322,739
Vacant (sf)	67,940	159,797
Vacancy Rate	63.4%	12.1%
Avg Gross Asking Rent (psf) (a)	-	$2.03

Note:
(a) Asking rents reflect direct gross leases.
Sources: CoStar, 2020; BAE, 2020.

Average Office Rents (PSF), 2015 - 2019

	Shadelands Business Park	
Year	**Class A**	**Classes A, B, C**
2015 (Q4)	$1.85	$1.90
2016 (Q4)	$2.25	$2.01
2017 (Q4)	$2.25	$2.10
2018 (Q4)	$2.20	$2.07
2019 (Q4)	-	$2.03
% Change 2015-19	NA	6.8%

Sources: CoStar, 2020; BAE, 2020.

Northgate/Civic Center District, San Rafael. This district is north of downtown San Rafael along Highway 101 in central Marin County between the Mall at Northgate/Manual T. Freitas Parkway to the south and Lucas Valley Road to the north. This district is comprised of approximately 731,600 square feet office space on over 80 acres (excluding the Mall at Northgate and other retail properties). Access to this district is primarily by automobile although it served by Marin Transit bus service. There is a newly opened SMART commuter train station 0.4 miles to the south of the Mall at Northgate, but to access that station is poor: one must walk along Merrydale Road around the Mt. Olivet Cemetery and a public storage facility to reach it. The district's retail is primarily located within the Mall at Northgate but this center is a traditional mall with surrounding parking fields hampering pedestrian access.

The district was built out primarily in the 1960s and 1970s with additional modest construction in the 1980s. Only one new office complex was built in the 1990s and the three-building Vineyard Business Center on Redwood Highway was developed in 2004. CoStar reports only one Class A office property, the 130,000 square foot Regency Center at 100 Smith Ranch Road. Overall the district's vacancy rate is 6.2 percent which is somewhat lower than the seven to ten percent vacancy rate that typically indicates a balanced relationship of supply and demand. In contrast, Class A buildings in Downtown San Rafael had less than a 3 percent vacancy rate at the end of the fourth quarter of 2019. Tenants are attracted to the Northgate district for its low rents but rents are not high enough to justify new construction. No new office has occurred since 2004.

Over the past five years office rents across all three classes in the Northgate District have risen by approximately 9.4 percent between the end of the fourth quarter 2015 and the end of the fourth quarter 2019, compared to an overall rise of 17.1 percent for Downtown San Rafael office generally[5]. The last reported rate for the Class A office property at 100 Smith Ranch Road is $3.25 monthly per square foot on a full-service basis. This is in contrast to the reported Class A rental rate of $4.00 monthly per square foot for offices at the Rafael Town Center in downtown San Rafael that has a highly accessible SMART station and downtown retail and service amenities. Bio-Marin, one of Marin County's largest private employers, has recently received entitlements to expand its office and labs in downtown with a new 207,000 square foot development. A knowledgeable office property owner contacted by BAE confirmed that tenant prospects prefer a downtown San Rafael location.

[5] Again, similar to the Shadelands case study, a meaningful change for Class A office cannot be estimated since there is only one building in this district's Class A inventory.

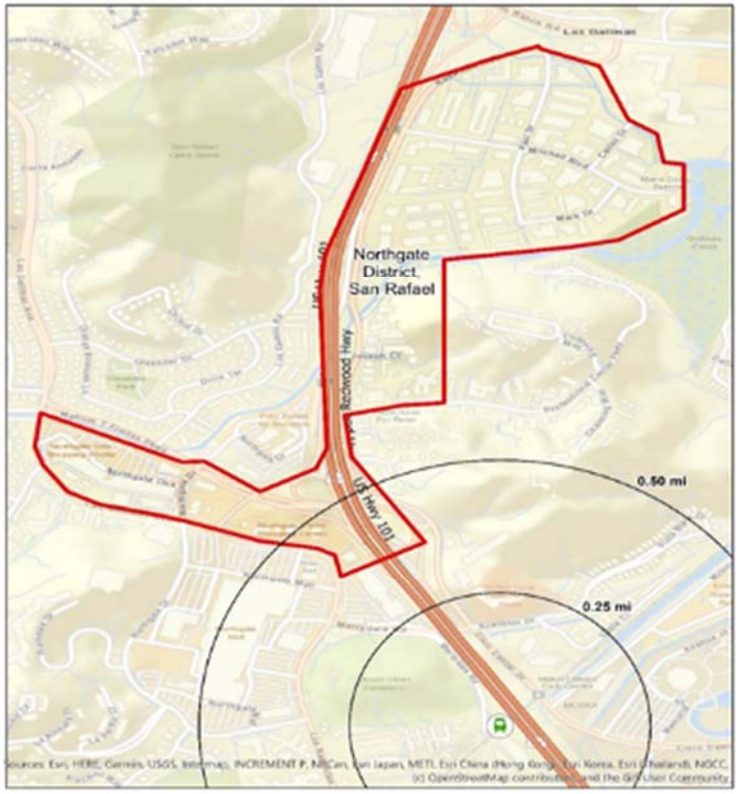
Figure 14: Northgate District, San Rafael

District Description

Northgate District is located 3 miles north of Downtown San Rafael along Highway 101. A small portion is approximately 0.4 miles away from the Marin Civic Center SMART station.

Key Trends

Approximately 732,000 sq. ft. office inventory
6% vacancy rate
$2.45 monthly/ per sq. ft. asking rent - All classes
$3.25 monthly/ per sq. ft. asking rent - Class A
6.8% change in rents 2015-2019 - All Classes
14.0% change in rents 2015-2019 - Class A
No new construction since 2004



Northgate District, San Rafael

	Office Building Class	
Summary, Q4 2019	Class A	Classes A, B, C
Number of Buildings	1	46
Inventory (sf)	130,000	731,579
Vacant (sf)	7,412	45,409
Vacancy Rate	5.7%	6.2%
Avg Gross Asking Rent (psf) (a)	$3.25	$2.45

Note:
(a) Asking rents reflect direct gross leases.

Sources: CoStar, 2020; BAE, 2020.

Average Office Rents (PSF), 2015 - 2019

	Northgate District	
Year	Class A	Classes A, B, C
2015 (Q4)	$2.85	$2.24
2016 (Q4)	$2.85	$2.35
2017 (Q4)	$2.94	$2.55
2018 (Q4)	$3.00	$2.51
2019 (Q4)	$3.25	$2.45
% Change 2015-19	14.0%	9.4%

Sources: CoStar, 2020; BAE, 2020.

Marina Village Office Park, Alameda. The Marina Village Office Park is located in the City of Alameda across the Oakland estuary from Jack London Square and downtown Oakland. It is situated off of Webster Street at the southern end of the Webster and Posey Tubes that connect Alameda to downtown Oakland. The office park is approximately 1.5 miles east of the Alameda Ferry Terminal that links Alameda and downtown Oakland to San Francisco. While this office park is within a half mile the Capitol Corridor Oakland Station and another ferry terminal at Jack London Square, there is no pedestrian or bike access; bus access takes approximately a half hour compared to eight minutes auto.

Marina Village consists of approximately 1.1 million square feet of office and research space that stands on over 200 acres and includes 32 buildings. This office park was developed starting in 1979 and continuing through the 1990s, with the bulk of space constructed during the 1980s. CoStar does not show any of the office properties as Class A office; all are either Class B or C properties. The overall vacancy rate for the district is 18.1 percent as of the end of the fourth quarter 2019, which is significantly higher than the seven to ten percent vacancy rate that typically indicates a balanced relationship of supply and demand. Tenants are attracted to the district for its low rents and the office park is home to many technology companies that have sought less expensive locations as office rents have risen sharply in San Francisco and Oakland. With an average reported rent at $2.82 monthly per square foot at the end of the fourth quarter 2019, rents are not high enough to justify new construction. No new office has occurred since 2001.

Over the past five years office rents across all three classes in the Marina Village have risen by approximately 7.6 percent between the end of the fourth quarter 2015 and the end of the fourth quarter 2019, compared to an overall rise of 71 percent for all classes of office in downtown Oakland.

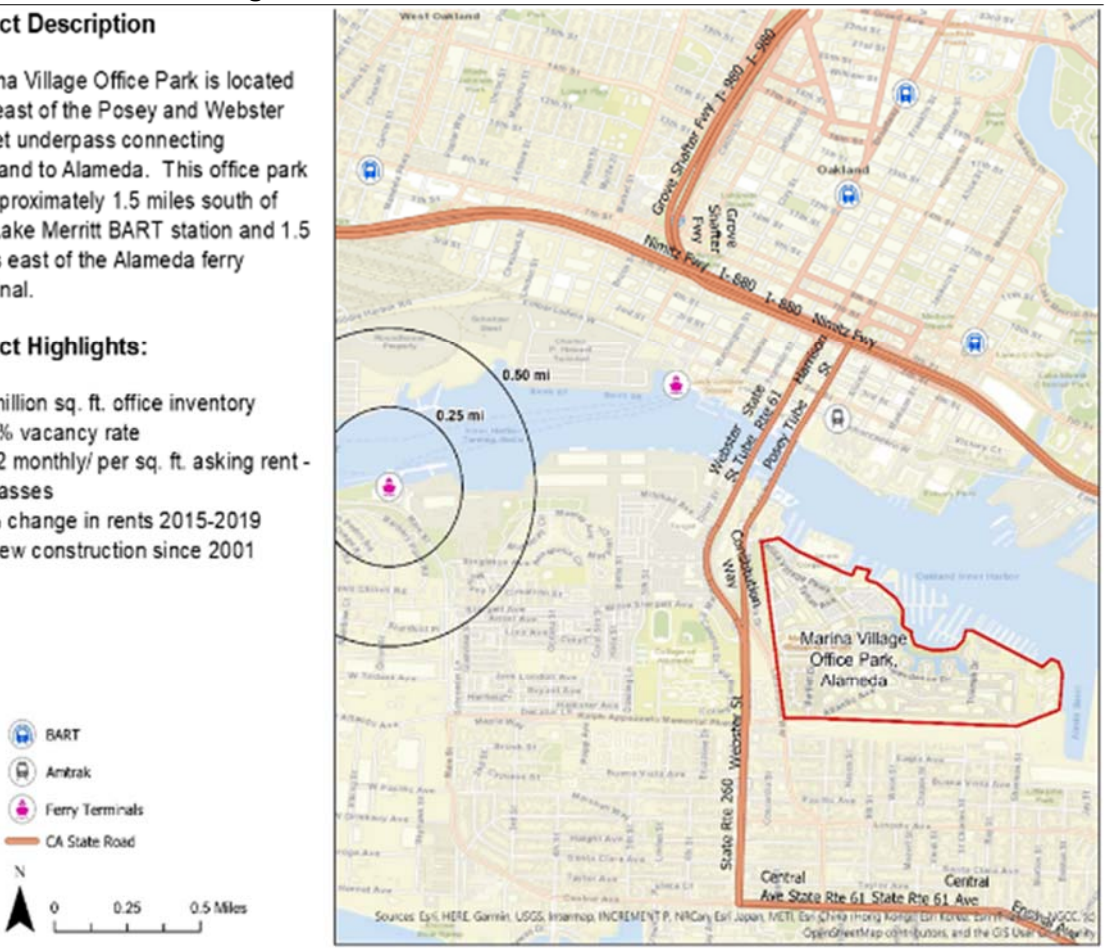
Figure 15: Marina Village Office Park, Alameda

District Description

Marina Village Office Park is located just east of the Posey and Webster Street underpass connecting Oakland to Alameda. This office park is approximately 1.5 miles south of the Lake Merritt BART station and 1.5 miles east of the Alameda ferry terminal.

District Highlights:

1.2 million sq. ft. office inventory
18.1% vacancy rate
$2.82 monthly/ per sq. ft. asking rent - All classes
7.6% change in rents 2015-2019
No new construction since 2001



Marina Village Office Park, Alameda

Summary, Q4 2019	Office Building Class: Class A	Office Building Class: Classes A, B, C
Number of Buildings	-	35
Inventory (sf)	-	1,179,616
Vacant (sf)	0	213,259
Vacancy Rate	NA	18.1%
Avg Gross Asking Rent (psf) (a)	-	$2.82

Note:
(a) Asking rents reflect direct gross leases.

Sources: CoStar, 2020; BAE, 2020.

Average Office Rents (PSF), 2015 - 2019

	Marina Village Business Park	
Year	Class A	Classes A, B, C
2015 (Q4)	-	$2.62
2016 (Q4)	-	$2.85
2017 (Q4)	-	$2.30
2018 (Q4)	-	$3.23
2019 (Q4)	-	$2.82
% Change 2015-19	NA	7.6%

Sources: CoStar, 2020; BAE, 2020.

Final Environmental Impact Report

Serramonte Del Rey Campus Redevelopment

SCH# 2023060571

Prepared by

DALY CITY CALIFORNIA
INCORPORATED MARCH 22 1911
GATEWAY TO THE PENINSULA

In Consultation with

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

November 2023

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Section 1.0 Introduction

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the Serramonte Del Rey Campus Redevelopment project.

1.1 Purpose of the Final EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of Daly City and any Responsible Agencies in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

(1) The Final EIR has been completed in compliance with CEQA;
(2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
(3) The Final EIR reflects the lead agency's independent judgment and analysis.

1.2 Contents of the Final EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

a) The Draft EIR or a revision of the Draft;
b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
e) Any other information added by the Lead Agency.

1.3 Public Review

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced in the Final EIR are available for public review at the City's Planning Division office located at 333 90th Street, Daly City, CA 94015 on weekdays during normal business

hours. The Final EIR is also available for review on the City's website: https://link.edgepilot.com/s/c4d7a134/mxgGDUo1yEKLLB8SOFJHUg?u=http://www.dalycity.org/feir.

Section 2.0 Draft EIR Public Review Summary

The Draft EIR for the Serramonte Del Rey Campus Redevelopment project, dated June 2023, was circulated to affected public agencies and interested parties for a 45-day review period from July 25, 2023 through September 8, 2023. The City of Daly City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability (NOA) of Draft EIR was published on the City's website (https://www.dalycity.org/1153/8941/Serramonte-Del-Rey-Campus-Redevelopment-) and filed at the County Clerk Recorder's Office on July 25, 2023.
- Notification of the availability of the Draft EIR was mailed to property owners and tenants within a 300 foot radius of the project boundary and other members of the public who had indicated interest in the project;
- The Draft EIR was delivered to the State Clearinghouse on July 25, 2023, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (https://www.dalycity.org/1153/8941/Serramonte-Del-Rey-Campus-Redevelopment-) and at the City's Planning Division office located at 333 90th Street, Daly City, CA 94015.

Section 3.0 Draft EIR Recipients

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.

The NOA for the Draft EIR was sent to owners and occupants within 300 feet of the project site and to adjacent jurisdictions. The following agencies received a copy of the Draft EIR from the City or via the State Clearinghouse:

- California Air Resources Board
- California Coastal Commission
- California Department of Conservation
- California Department of Education
- California Department of Fish and Wildlife
- California Department of Fish and Wildlife, Bay Delta Region 3
- California Department of Fish and Wildlife, Marin Region 7
- California Department of Forestry and Fire Protection
- California Department of Housing and Community Development
- California Department of Parks and Recreation
- California Department of Transportation, District 4
- California Department of Water Resources
- California Highway Patrol
- California Native American Heritage Commission
- California Natural Resources Agency
- California Public Utilities Commission
- California Regional Water Quality Control Board, San Francisco Bay Region 2
- California State Lands Commission
- Department of General Services
- Department of Toxic Substances Control
- Office of Historic Preservation
- State Water Resources Control Board, Division of Drinking Water
- State Water Resources Control Board, Division of Drinking Water, District 17
- State Water Resources Control Board, Division of Water Quality

Section 4.0 Responses to Draft EIR Comments

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of Daly City on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the City of Daly City are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below. None of the comments raised on the Draft EIR represent new significant information that would warrant recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5(a).

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4.1 Master Responses

A number of comments received during the public circulation of the Draft EIR raised similar concerns and questions; therefore, master responses have been prepared to respond to those common concerns/questions. The master responses address the following topics:

- Master Response 1: Demonstration Garden
- Master Response 2: Regional Housing Needs Allocation
- Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law
- Master Response 4: Project Description
- Master Response 5: Wetlands
- Master Response 6: Recreation
- Master Response 7: Tribal Cultural Resources
- Master Response 8: Alternatives

Master Response 1: Demonstration Garden

Several comments claim the demonstration garden on the project site should qualify as a unique or rare resource that should be protected as part of the CEQA process. CEQA does not define when a garden, park, or other recreational facility should be considered a significant resource, which indicates the lead agency has discretion, based on substantial evidence, in deciding whether to treat a recreational facility as a significant resource. In considering whether the demonstration garden should be treated as a protected resource under CEQA, the City considered whether it is a designated recreational use (i.e. included on official public agency maps), a historical resource (associated with important persons or events or designed by a master designer or featuring a unique design), or a unique biological habitat for special status species. Absent these characteristics or associations, a typical community garden, while understood to be a valuable resource to the community who uses it, would not rise to the standard of a protected resource under CEQA. Examples of gardens in the Bay Area that would presumably be considered significant resources under CEQA include the San José Rose Garden (1927), the Tilden Regional Parks Botanic Garden in Berkeley (1940), and the Japanese Tea Garden in San Francisco (1894), in that each is an officially recognized facility with a long, storied history and/or association with important persons or events and have been considered integral, for nearly a century or more, to the community they are located in.

The demonstration garden on the project site is described in Section 2.2.1.1 of the Draft EIR (page 10). The Jefferson Union High School District (JUHSD) created the approximately 0.5 acre garden 20 years ago as a demonstration garden to be used by the adult education building on-site.[1] Students and members of the public who signed up for gardening classes were allowed to use the

[1] October 11, 2023 Ltr. From Jefferson Union High School District.

demonstration garden. JUHSD has not offered gardening classes since 2007. In 2018, an application to list the demonstration garden as a "community garden" was submitted to the San Mateo County Office of Sustainability; however, the application was sent without JUHSD's knowledge or authorization. The "community garden" designation was removed in 2019 per JUHSD's request. Since the discontinuation of gardening classes in 2007, the demonstration garden has been used sparingly by members of the public on an informal, unsanctioned basis. Security staff for the garden report an average of two to four people per week visiting the garden, and about half of these individuals visit for durations of 10 minutes or less. In addition, JUHSD has made it clear to the public that use of the demonstration garden is temporary and provisional. For these reasons, the demonstration garden is not an environmental resource that is rare or unique to the region. The Draft EIR has described the garden's size, history, characteristics, and status so that the public and decision-makers are informed of the loss of the demonstration garden, should the project be approved and implemented.

Master Response 2: Regional Housing Needs Allocation

The proposed project is adding 1,235 residential units to the City, including 20 percent affordable units (13.5 percent low-income and 6.5 percent moderate-income), which is double the City required 10 percent affordable units. Thus, the proposed project would contribute towards the City's Regional Housing Needs Allocation (RHNA) target for both market-rate and affordable housing. The City's current RHNA targets are 1,971 market-rate units and 2,867 affordable units). Requiring the project to provide additional affordable units beyond what is required by City's Inclusionary Housing Ordinance is not relevant to the project's environmental impacts under CEQA and, therefore, is not discussed in the Draft EIR. Additional information regarding the project and the City's RHNA targets will be included in the City's staff report. It is not expected or a requirement that each residential development project would provide a range of units in the precise distribution to match the City's overall RHNA unit requirements for various income levels and types of units. Some projects will provide the minimum affordable units specified by the City's Inclusionary Ordinance, while others, including both this project and those projects designed to be 100% affordable housing developments, will exceed the minimum, and the City would monitor implementation of the Housing Element over this RHNA cycle to ensure the various unit income targets are met.

Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law

The project's compliance with the City's Inclusionary Housing Ordinance is discussed under Impact LU-2 in Section 3.11 Land Use of the Draft EIR (page 124). The project complies with the Inclusionary Housing Ordinance by providing a 20 percent affordable housing component, which is double the required 10 percent. It also offers units at affordability levels that are deeper than what is required by law, allowing for a more diverse population of project residents than what otherwise might be provided. Further after the publication of the Draft EIR, and in response to community input, it has been clarified that the amount of affordable housing required for the project is 20 percent of all constructed dwelling units. These additional units will be dispersed through all project parcels. The Draft EIR takes into account the inclusion of at least 10 percent affordable units into

its analysis of environmental impacts, and additional required affordable housing was foreseen in the project description. The clarification of a 20 percent affordability component would not cause or increase an environmental impact. The timing and distribution of the affordable units across the project site, however, are not CEQA issues. All project units will be subject to the same restrictions on physical development, including density maximums. Moreover, both the project's market-rate and affordable units will have the same amenities, meaning there would not be any land use incompatibilities or other physical discrepancies that would impact the environment. The City's Inclusionary Housing Ordinance requires that "[t]he quality of design and overall quality of construction of the inclusionary units shall be consistent with the design of all market-rate units in the residential development … have the same amenities as the market-rate units, including the same access to and enjoyment of common open space and facilities in the residential development." (See City Ordinance Sec. 17.47.100.) The Affordable Housing Agreement for the Project will require that the inclusionary units on Parcels C-F shall be comparable to the other units on Parcels A through F of the Project, in terms of appearances, finishes, and features, and the inclusionary units shall be provided, or have access to, the same neighborhood amenities as the other units on Parcels A through F of the Project (e.g., parks and recreation trails). Assertions that units will be concentrated in a single portion of the project site, and that such units will be inferior in quality when compared to market-rate units, are not based on any facts or evidence in the record.

Some comments suggest that the Parcel B building amenities described in the DEIR must be made available to all residents of the Precise Plan area in order to comply with Health and Safety Code section 17929 (enacted by Assembly Bill 491). This is not required under State law, and does not raise any physical impacts with the potential to affect the environment. Health and Safety Code section 17929 requires that occupants of affordable units within a residential structure must have access to the same entrances, common areas, and amenities of that structure that are available to market rate occupants. (Health and Safety Code § 17929 (a)(1)). All units within the Parcel B development will have similar access and, as explained above, the project will ensure parity across all parcels. Accordingly, buildings on Parcels C-F will have access to the same entrances, common areas, and amenities of that building that are available to market rate occupants of that building, in accordance with Health and Safety Code section 17929. From an environmental standpoint, accessibility of units to a particular entrance, common areas, or amenity would not have any implications regarding emissions, noise, or other environmental topics. Regardless, as explained above, the project will ensure all units in all buildings be situated similarly.

Some commentors suggest that placement of majority of affordable units on a single parcel would violate the Unruh Civil Rights act and Fair Employment Housing Act (Cal. Civil Code § 51; Gov. Code § 12900 et seq), and could interfere with the City's obligation to affirmatively further fair housing under State housing element law and avoid discrimination in any program or activity funded by the state of California. (See Gov. Code §§ 65584(e), 11135). These statutes are designed to prevent discrimination on the basis of recognized protected classes. The laws address important social issues and, as with similar local and other state rules identified above, do not implicate environmental issues under CEQA. Moreover, as stated above, all affordable units will be

comparable to the market-rate units on Parcels A through F of the Project, in terms of appearances, finishes, and features, and the inclusionary units shall be provided, or have access to, the same neighborhood amenities as the other units on Parcels A through F of the Project. There is no basis for any claim that the Project's affordable housing units will discriminate against any person on the basis of a protected class. In addition to avoiding discrimination, the State mandates that cities take further "meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity." (Gov. Code §§ 65584(e).) The Project helps the City accomplish this by providing affordable housing well in excess of the 10% inclusionary housing requirement imposed under the Daly City Municipal Code, and ensuring the school district's student population, which is the least-funded population in San Mateo County, have better access to educational opportunities. A fundamental objective of the Project is to "advance an innovative land use master plan to attract investment, stabilize District finances, increase funding for student education and attract and retain highly qualified teachers and staff." (Draft EIR, page 18.)

The assertions the commentors make about non-compliance with certain City ordinances or state laws are not environmental in nature, but rather consist of claims pertaining to legal and/or social issues, and are not discussed in the Draft EIR. Such issues are important, nevertheless, and additional information regarding the project's compliance with the Inclusionary Housing Ordinance will be included in the City's staff report.

Master Response 4: Project Description

Several comments contested the adequacy of the project description included in Section 2.2 of the Draft EIR (pages 3-18), specifically the description of the proposed Precise Plan and development on Parcels C-F. Specific development plans for these parcels have not been developed yet; however, the Draft EIR describes the maximum allowed development for each parcel in Table 2.2-1 and the maximum height allowed on each parcel (see page 4 of the Draft EIR). Analysis in the Draft EIR is based on the assumption that the maximum allowed residential units at the site of 1,235, and the maximum allowed commercial uses of 14,000 square feet, will be constructed. This provides the most conservative environmental analysis. In order to complete the Air Quality and GHG Assessment (Appendix C of the Draft EIR) and Noise and Vibration Assessment (Appendix K of the Draft EIR), JUHSD provided assumptions for the number of units to be built on Parcels C-F. Future building placements on Parcels C-F were based on figures provided in the proposed Precise Plan (see Appendix B of the Draft EIR). Based on this project information, the Draft EIR conservatively analyzed the proposed project's impacts on the environment, including development on Parcels C-F, utilizing the maximum development assumptions noted above. Insofar as commenters suggest the development of Parcels C-F must be described in the same detail as Parcel B, such is not required under any law, including CEQA. While development of some portions of the Project site include greater design level detail, the project is a precise plan, meaning it is a zoning entitlement. While the exact buildout of this zoning district has not been designed, the precise plan contains detailed development standards, design guidelines, and other restrictions that provide the decisionmakers with a clear idea of the project's scope and potential impacts on the environment. Further design details for Parcel C-F would not add any meaningful information, including without

limitation because the project, because of its infill location, is exempt from evaluation of its aesthetic impacts under state law.

Master Response 5: Wetlands

Several comments disagreed with the Draft EIR's conclusion that the meadow and arroyo willows on-site do not qualify as state or federally protected wetlands. Checklist question c) under Biological Resources in Appendix G of the CEQA Guidelines specifically asks if a project would have a substantial adverse effect on state or federally protected wetlands. The City, as the Lead Agency, has the discretion, based on substantial evidence, to make a CEQA determination about whether there are wetlands protected under federal or state law on the project site. Other public agencies with independent regulatory authority over wetlands may reach their own, potentially different, conclusions when the project applicant proceeds to seek a determination, permit, or other approval from those agencies later in the development process. But as the Lead Agency, the City may consider thresholds of significance based on environmental standards that other agencies have adopted but which are generally applicable. As discussed under Impact BIO-3 of the Draft EIR (page 67), the City agrees with, and based the Draft EIR's conclusions on, the findings of the Wetland Assessment (Appendix E of the Draft EIR) and the Biological Peer Review (Appendix F of the Draft EIR), both of which constitute substantial evidence as defined by CEQA, that the meadow on-site does not appear to qualify as a jurisdictional wetland; thus, it would not be considered a state or federally protected wetland. However, the City, as CEQA lead agency, is not in the Draft EIR making a jurisdictional determination under the US Clean Water Act, Porter-Cologne Water Quality Control Act, or Fish & Game Code, as those determinations, if the applicant were to proceed to implement the project, will ultimately be made later in the development process by separate public agencies charged with implementing those laws. The U.S. Army Corps of Engineers, the Regional Water Quality Control Board (RWQCB), and California Department of Fish & Wildlife may exert jurisdiction through their own procedural requirements separate from the CEQA process.

In addition, while the Draft EIR concludes that there are no state or federally protected wetlands on-site, the Draft EIR discusses impacts to special-status species, which may be present in the meadow, under Impact BIO-1 of the Draft EIR (pages 64-66).

Master Response 6: Recreation

The Demonstration Garden on the project site is not considered a recreation resource by the City of Daly City, as it is not identified in the City's Park and Open Space Master Plan as a recreational use, and the garden is not being relied upon by the City to meet the recreation needs of the current and planned population of the City, as demonstrated in the General Plan EIR's discussion of the future recreation needs from planned population growth, which omits any discussion of the garden. In addition, as discussed above in Master Response 1, JUHSD never officially sanctioned the public use of the garden, and a very limited number of community members (i.e., two to four) have been using the garden informally and without an expectation such use would be permanent. For these reasons, the garden was not considered a significant, recognized recreational resource and its removal was not considered a significant impact.

The gymnasium on the project site is similarly not considered a recreational resource by the City. The gymnasium is not open to the public for everyday use and current programs utilizing the gym have obtained permission from JUHSD. Specifically, JUHSD has indicated there are two groups who have permission to use its facilities for limited purposes, and that these program operators are allowed on the site on a month-to-month basis, and access is limited to the program operators and the individuals they invite to participate. Moreover, the gymnasium on the site is not relied upon in the City's Parks and Open Space Master Plan as a resource relied upon to meet the City's recreational needs. Finally, similar gymnasiums at public schools and recreational centers exist within the City; therefore, the removal of the gymnasium at the project site would not eliminate or significantly reduce this type of use from the City.

In addition, CEQA requires the Draft EIR to analyze whether a project would cause an increase in the use of existing recreational facilities such that substantial deterioration would occur, or if a project includes recreational facilities, would the construction of those facilities cause adverse impacts on the environment (see Section 3.16.2.1 of the Draft EIR, page 165). As discussed under Impact REC-1, the project proposes new park space for future residents to use and would be required to pay park in-lieu fees to offset recreational demand. Thus, impacts to gymnasiums within the City would be reduced to a less than significant level. As discussed under Impact REC-2, the demolition of the existing gymnasium and construction of new park space on-site would not result in any significant environmental impacts.

Master Response 7: Tribal Cultural Resources

Several comment letters contend that the Demonstration Garden on the project site should be considered a tribal cultural resource; however, these comment letters were not from designated tribal representatives. As discussed in Section 3.3 Cultural Resources (pages 71-77) and 3.18 Tribal Cultural Resources (191-193) in the Draft EIR, a Cultural Resources Study was prepared for the project that did not identify any known tribal cultural resources on-site. In addition, a Sacred Lands File search was requested from the Native American Heritage Commission (NAHC) and results came back negative. The NAHC provided a list of tribes associated with the project area, and those tribes (Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe) were contacted by the City on June 30, 2021 for further consultation, per Assembly Bill (AB) 52 and Senate Bill (SB) 18. The City received no responses from designated tribal representatives; therefore, the City concluded consultation and determined that no known tribal cultural resources exist on-site.

In addition, tribal cultural resources are typically associated with pre-contact history, i.e. resources important to a tribe at the time of the arrival of Europeans, and not sites, features, objects developed by modern society. The Demonstration Garden was constructed in the last 20 years and is a modern day feature, and as such, would not meet the definition of a tribal cultural resource as defined by Section 15064.5 of the CEQA Guidelines. Finally, the Demonstration Garden does not exist in a natural landscape. The entire project site was graded and redeveloped for school uses decades ago, and in fact there is a tennis court and drainage infrastructure underlaying at least a

significant portion of the Demonstration Garden. The setting is therefore a disturbed, urban environment. Accordingly, there are no historical, natural facilities, topography, or other features existing within the footprint of the Demonstration Garden.

Master Response 8: Alternatives

Section 7.0 of the Draft EIR (pages 209-216) discusses alternative to the proposed project. As required by CEQA, alternatives to the project should be identified to avoid or substantially lessen any significant effects of the project and still meet the project's basic objective. As discussed throughout the Draft EIR, the proposed project would not result in any significant and unavoidable impacts. The project would only result in less than significant impacts with mitigation incorporated for the following environmental resource areas:

- Air Quality (construction criteria pollutants, TAC health risk)
- Biological Resources (bats, nesting birds)
- Cultural Resources (archaeological resource/human remains)
- Geology and Soils (paleontological resources)
- Hazards and Hazardous Materials (underground/aboveground storage tanks)
- Noise (construction noise)
- Transportation (vehicle miles traveled, construction traffic, pedestrian/bicycle safety, emergency access)
- Tribal Cultural Resources (unknown buried tribal cultural resources)

Of the impacts identified above, any type of development project requiring site/ground disturbance would result in similar impacts related to biological resources, cultural resources, geology and soils, hazards and hazardous materials, and tribal cultural resources. As such, alternatives to lessen these impacts were not considered in the Draft EIR. An alternative to preserve the Demonstration Garden was not included in the Draft EIR as the removal of the garden is not considered an environmental impact (see Master Responses 5, 6, and 7 above), and alternatives related the City's Inclusionary Housing Ordinance and RHNA targets were not included as they are not CEQA impacts (see Master Response 2 and 3 above).

The Draft EIR considered alternatives that could substantially lessen the project's air quality, noise, and vehicle miles traveled (VMT) impacts. Section 7.4.1 of the Draft EIR (211-212) identifies three alternatives that were considered but rejected due to either infeasibility (Location Alternative) or because they would not substantially lessen the project's impact (Mixed-Use Alternative and Reduced Housing Alternative). No other feasible alternatives were identified by the City; therefore, the Draft EIR included the No Project Alternative and the No Project – Existing Zoning Alternative as the only analyzed alternatives. As discussed in Section 7.4.2.2 of the Draft EIR (pages 214-215), the No Project – Existing Zoning Alternative also acted as a reduced development alternative given the total square footage at build-out under existing zoning is anticipated to be 500,000 square feet less than the proposed project.

Federal and State Agencies

A. California Department of Transportation (dated September 6, 2023)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Serramonte Del Rey Campus Redevelopment Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the July 2023 DEIR.

Project Understanding
This project proposes to redevelop the site of the Jefferson Union High School District office buildings into a mix use development. It would have up to 1,235 units of affordable housing and market-rate rental housing with 14,000 square feet of retail and commercial use space. The project site is located across the on- and off-ramps at Serramonte Blvd.

> **Response A.1:** This is an introductory statement; therefore, no further response is required.

Comment A.2: Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide (link).

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have less than significant impacts with mitigation. Caltrans commends the Lead Agency in developing the Transportation Demand Management (TDM) Plan to reduce employee and guest VMT, therefore working towards meeting the State's goal of a 15-percent reduction. The proposed measures identified in the TDM plan should be documented with annual monitoring reports to demonstrate effectiveness.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, refer to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (link).

Response A.2: Mitigation measure MM TRN-2.1 (page 179 of the Draft EIR) requires annual monitoring for the first six years of project occupancy.

Comment A.3: State Projects within Vicinity

The following Caltrans' projects are planned and included in the State Highway Operation and Protection Program (SHOPP), the State's "fix-it-first" program that funds the repair, safety improvements, some highway operational improvements, and preservation of the State Highway System (SHS).

County	Route	Post Mile(s)	Target Program	EA	Description	Project Cost ($K)	Construction Date
SM	1/280	SM R44/ R48	2020 SHOPP	0Q440	Install Best Management Practices (Stormwater and Trash Devices) along SM-1 and SM-280 within Significant Trash Generation Area (STGA). This is to meet Caltrans D4 obligations under the Trash Cease and Desist Order (CDO).	7575	2022/23
SM	1	SM 29.034/ 46.716	Middle Mile Broadband Network	1Y960	Install broadband conduit and fiber optic as part of the Broadband Middle Mile Network.	8540	2024/25

Response A.3: These state highway improvement projects are noted. Both were not listed as cumulative projects in the Draft EIR as the first one involves stormwater and trash management efforts on the state highways and would be completed prior to the construction start of proposed project, and the second one would involve negligible construction. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.4: Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. 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.4: The Draft EIR estimates that project would generate 170 new transit users (see page 176 of the Draft EIR). These transit users are expected to use BART and SamTrans routes 24 and 120. The Draft EIR concluded that the additional 170 transit users would not exceed the capacity of existing bus or BART services within the project area; thus, no additional transit improvements are proposed as part of the project. The project would implement mitigation measure MM TRN-2.1, which includes Transportation Demand Management (TDM) strategies to increase mode share. As part of the Development Agreement (DA), the applicant shall pay for and

implement the majority of the off-site improvement identified on page 11 of the Draft EIR: in addition, the applicant shall make two separate cash contributions to the City. One to implement off-site park, bicycle, and/or pedestrian improvements at the City's discretion, and another to help fund the Clarinda Avenue/Highway 1 intersection signalization. The City has determined that these contributions address any project-specific impacts and in fact confer, pursuant to the project's development agreement, community benefits that leave the local circulation network in a condition that is superior when compared to existing conditions.

Comment A.5: Construction-Related Impacts
Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (link).

Response A.5: The need for a transportation permit for oversize construction vehicles is noted. Impacts related to construction of the proposed project are discussed throughout the Draft EIR, including potential impacts on State ROWs. MM AIR-2.1 requires the project to implement Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. MM AIR-2.2 requires the project to meet emissions standards for certain construction equipment. Impacts specific to noise are discussed in Section 3.13 of the Draft EIR (pages 128-148), and MM NOI-1.1 requires that project to develop a construction noise control plan for each construction phase. The Draft EIR includes a specific analysis of the impacts of construction traffic on existing vehicle traffic near the project site (page 180), and MM TRN-3.1 requires the project to prepare and implement a Construction Traffic Management Plan to minimize impacts of project construction on the transportation system. Each of the aforementioned mitigation measures will reduce construction impacts to a less-than-significant level.

Comment A.6: Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Response A.6: The project shall implement mitigation measure MM TRN-3.1, which requires the project to prepare a Construction Traffic Management Plan. The City is open to coordinating with Caltrans on implementation of the plan.

Comment A.7: Lead Agency
As the Lead Agency, the City of Daly City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (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.7:** The Draft EIR evaluated impacts on off-site circulation networks, including State facilities, with respect to both CEQA topics (e.g., vehicle miles traveled and safety considerations) and non-CEQA topics (e.g., traffic congestion). This latter category of impact was included for information only. The DEIR determined there would be no impacts to any pertinent portion of the State Transportation Network, and therefore appropriately does not include any mitigation measures that.

Comment A.8: Equitable Access
If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

> **Response A.8:** As discussed under Impact TRN-1 in Section 3.17 Transportation of the Draft EIR (page 177), all pedestrian facilities improved by the project would be ADA compliant. In addition, the project would implement mitigation measure MM TRN-3.1, which requires the project to provide safe and adequate pedestrian and bicycle access during project construction.

Comment A.9: Encroachment Permit
In Section 3.17, two planned improvements are mentioned involving the intersection of State Route (SR)-1/ Clarinada and of SR-1/ Serramonte Boulevard. Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. Your application package may be emailed to D4Permits@dot.ca.gov.

To obtain information about the most current encroachment permit process and to download the permit application, please visit Caltrans Encroachment Permits (link).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Marley Mathews, Transportation Planner, via LDR-D4@dot.ca.gov.

For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Response A.9: The need for an encroachment permit for work within Caltrans right-of-way is noted. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Regional and Local Agencies

B. San Francisco International Airport (dated August 10, 2023)

Comment B.1: Thank you for notifying the San Francisco International Airport (SFO or the Airport) of the availability of the Draft Environmental Impact Report (DEIR) for the Serramonte Del Rey Campus Redevelopment Project (Proposed Project), located in the City of Daly City (City). We appreciate this opportunity to review and provide comments on the DEIR.

As described in the DEIR, the Proposed Project is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard on an approximately 22-acre site (Assessor's Parcel Number 091-211-230). The site is occupied by the following land uses: a 1960s-era building containing nonprofit organizations and offices for the Jefferson Union High School District (JUHSD); some temporary buildings; surface parking; and a construction staging area for the JUHSD faculty and staff housing project.

In 1985, the City approved the Serramonte Del Rey Precise Plan (1985 Precise Plan) for a larger 50-acre area that includes the Proposed Project site. Phase I of the 1985 Precise Plan, which covered the 28-acre area to the south of the Proposed Project site, has been implemented, and Phase II allows for the development of up to 175 residential units and approximately 700,000 square feet of office space on the Proposed Project site.

The Proposed Project consists of a new Serramonte Del Rey Precise Plan (2023 Precise Plan) and a specific development project at the northeast corner of the site. The 2023 Precise Plan would replace Phase II of the 1985 Precise Plan; it would divide the Proposed Project site into six parcels and allow for the development of up to 1,235 residential units, approximately 14,000 square feet of retail space, a 1,400-square-foot childcare facility, and various infrastructure improvements. Allowable building heights under the 2023 Precise Plan would range from 77 feet to 150 feet.

The specific development project, which would be on Parcel B at the northeast corner of the site, consists of demolishing the existing temporary education building and surface parking lot and constructing a seven-story building containing 201 residential units and approximately 8,000 square feet of retail space.

> **Response B.1:** This is an introductory comment and restates the proposed project. No further response is required.

Comment B.2: The Proposed Project site is within two Airport Influence Areas (AIAs): Area A – Real Estate Disclosure Area (all of San Mateo County) and Area B – Policy/Project Referral Area (a smaller subarea in the northern part of San Mateo County), as defined by the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP). Within Area A, the real estate disclosure requirements of state law apply (see attachment). A property

owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property. Within Area B, the Board of Directors of the City/County Association of Governments of San Mateo County, acting as the designated Airport Land Use Commission (ALUC), shall review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals (see attachment). The real estate disclosure requirements in Area A also apply in Area B.

The Proposed Project site is located outside of the 65-decibel Community Noise Equivalent Level (CNEL) contour and all safety compatibility zones and, therefore, the Proposed Project would not appear to be inconsistent with the Noise and Safety Compatibility Policies adopted in the SFO ALUCP.

As described in Exhibit IV-17 of the SFO ALUCP (see attachment), the critical aeronautical surfaces at the Proposed Project location are at an elevation of approximately 800 feet above mean sea level (AMSL) as defined from the origin of the North American Vertical Datum of 1988. The elevation of the Proposed Project site is approximately 485 feet AMSL. The maximum building height proposed under the Precise Plan is 150 feet above ground level (AGL), and the height of the Parcel B development project is 85 feet AGL, measured to the top of the elevator penthouse. Both of these heights would be below the height of the lowest critical aeronautical surfaces (315 feet AGL), and the Proposed Project would not appear to be inconsistent with the Airspace Protection Policies of the SFO ALUCP, subject to the issuance of a Determination of No Hazard from the Federal Aviation Administration (see below) for any proposed structures and determinations from the City/County Association of Governments of San Mateo County as the designated ALUC.

> **Response B.2:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment B.3: This evaluation does not waive the requirement for the Proposed Project sponsor to undergo Federal Aviation Administration airspace review as described in 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any equipment taller than the permanent structures required to construct those structures.

> **Response B.3:** On September 9, 2021, both the proposed Precise Plan and Parcel B Development Project were reviewed by the San Mateo County Airport Land Use Commission and were approved for consistency with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francsico International Airport.

Comment B.4: The Airport recommends the following revisions (deletions shown in ~~strikethrough~~ and new text shown in double underline) on page 102 of the DEIR:

> ~~San Mateo County~~ Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport

Daly City is within the jurisdiction of the ~~San Francisco Airport (SFO) Land Use Plan component of the San Mateo County~~ Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP), adopted ~~in December 1996 and updated in 2001~~ November 2012. Established in the ~~CLUP~~ SFO ALUCP are procedures used by the San Mateo City and County Association of Governments (C/CAG) to review land use decisions in the vicinity of San ~~Mateo County airports~~ Francisco International Airport. Airport planning boundaries define where height, noise and safety standards, policies, and criteria are applied to certain proposed land use policy actions.

The Airport recommends the following revisions (deletions shown in ~~strikethrough~~ and new text shown in double underline) to the last paragraph on page 104 of the DEIR:

The project site is located within the SFO ~~CLUP~~ ALUCP Airport Influence Area B, which requires projects to be consistent with the goals and policies of the ~~CLUP~~ SFO ALUCP. The project site is approximately five miles northwest from the runway termination point of the San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the Community Noise Equivalent Level (CNEL) noise contours for the airport, as delineated in the ~~CLUP~~ SFO ALUCP.

The text at the bottom of page 128 of the DEIR includes a cross reference to Section 4.10, Land Use, but Section 4.10 does not exist. Furthermore, the Land Use section of the DEIR does not discuss airport land use compatibility issues. The Airport recommends the following revisions (deletions shown in ~~strikethrough~~ and new text shown in double underline) to the text at the bottom of page 128 and the top of page 129 of the DEIR:

Comprehensive Airport Land Use Compatibility Plan for the Environs of ~~the~~ San Francisco International Airport

~~As discussed in more detail in Section 4.10 Land Use, t~~The project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the SFO ALUCP. The site is located outside of the SFO 65 dB CNEL noise contour.

Response B.4: The City agrees with the suggested clarifications to the land use plan name and typos. Please refer to Section 5.0 Draft EIR Text Revisions below for revised text.

C. San Francisco Bay Regional Water Quality Control Board (dated September 8, 2023)

Comment C.1: We have reviewed Draft Environmental Impact Report (DEIR) (State Clearinghouse No. 2023060571) for the Serramonte Del Rey Campus Redevelopment (Project). The Project consists of development of a new approximately 22-acre Serramonte Del Rey Precise Plan and a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan.

We appreciate the importance of redevelopment projects that include affordable and market-rate rental housing as well as infrastructure improvements. However, we have concerns about the existing wetlands on-site and the corresponding Wetland Assessment provided in Appendix E of the DEIR. Specifically, we are concerned that there has been a wetlands jurisdictional determination made without consultation with the Water Board. Moving forward that jurisdictional determination, without securing Waste Discharge Requirements (WDRs), via the Porter-Cologne Act, from the Water Board, or a concurrence that no state regulated wetlands exist at the site, is not recommended because we do not agree with the assertion made in the DEIR that waters of the State do not exist that the Project site.

Comments on Appendix E, Wetland Assessment
The memo in Appendix E states that the Porter-Cologne Act's jurisdiction does not extend to the site, but the reasons provided in Appendix E are not sufficient to determine whether jurisdictional waters of the State exist at the site. Furthermore, the Water Board, as the agency that issues WDRs, has not been consulted about this jurisdictional determination.

The Water Board does not agree with the basis used in determining whether the on-sites wetlands are waters of the State. The jurisdictional determination made regarding the wetlands on-site is premised on the assumptions that 1) the wetland does not meet the U.S. Army Corps of Engineers'(Corps) three-wetland parameter test, and 2) the wetlands are artificial and transient. First, a jurisdictional wetland determination (JD) does not appear to have been conducted. Instead, the memo in Appendix E references excerpts from the Exhibits therein, which do not make any definitive determinations regarding whether wetlands exist. Both Exhibits in Appendix E were conducted to assess the site drainage. A JD must be conducted to verify whether there are hydric soils, wetland vegetation, and wetland hydrology. Additionally, Procedures for Discharges of Dredged of Fill Material to Waters of the State (Dredge and Fill Procedures) states that only two of the three Corps parameters must be fulfilled to qualify as a State regulated wetland. Second, Appendix E focuses on excerpts from Dredge and Fill Procedures that are taken out of context and misinterprets the terms "transient" and "artificial" regarding regulated waterbodies. For example, seasonal wetlands, intermittent streams, and ephemeral streams, are all transient waterbodies that are waters of the State. Under the Dredge and Fill Procedures, an area is defined as wetland as follows: "An area is wetland if, under normal circumstances, (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both; (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation."

This definition is further elaborated on in the Dredge and Fill Procedures, but the on-site wetland can still be a water of the State if it was formed from a lack of maintenance over the years and is currently functioning as a wetland without intervention, which appears to be the case on-site. We encourage you to coordinate with the Water Board to further examine the on-site wetlands to verify whether or not State wetlands exist and determine whether WDRs are required to fill the wetlands.

Projects with potential fill-related impacts to State waters, such as the Project, must first demonstrate their design avoids and minimizes those impacts to the extent practicable. As part of the WDRs process, we will require a thorough analysis of all the proposed alternatives, including their long-term indirect effects. The Water Board adopted U.S. Environmental Protection Agency's Section 404(b)(1), "Guidelines for Specification of Disposal Sites for Dredge or Fill Material," dated December 24, 1980, in its Basin Plan and Dredge and Fill Procedures for determining the circumstance under which filling of waters of the State may be permitted. The Section 404(b)(1) Guidelines and Dredge and Fill Procedures prohibit discharges of fill material into waters of the United States and in the case of the Dredge and Fill Procedures, waters of the State, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative that will achieve the project purpose. To accomplish this, the Guidelines and Procedures sequence the order in which proposals must be approached: 1) Avoid - avoid impacts to waters; 2) Minimize – once impacts have been avoided to the maximum extent practicable, modify the project to minimize impacts to waters; and 3) Compensate – once impacts have been fully minimized, compensate for unavoidable impacts to waters.

Summary
We are supportive of the Project's intent, but the determination regarding jurisdictional waterbodies at the Project site must be made by the Water Board. The arguments for why the wetlands on-site are not considered waters of the State is insufficient, and a JD must be conducted, and the Water Board must be consulted about potentially jurisdictional features to determine whether WDRs are needed. We look forward to hearing from and working on this Project as it moves forward. If you have any questions, please do not hesitate to reach out.

Response C.1: Please refer to Master Response 5: Wetlands above.

D. Nancy Lacsamana (dated July 30, 2023)

Comment D.1: pg 161

Serramonte condominiums/ Daly City is noted as being in the Brisbane School district.
It is not. location 525-595 Serramonte Blvd. on table 3.0-1

> **Response D.1:** The Serramonte Condominiums project is located within the Jefferson Elementary School District. This error has been corrected. Please refer to Section 5.0 Draft EIR Text Revisions for corrected discussion.

E. Sabrina Brennan (dated July 31, 2023)

Comment E.1: Please provide a current draft of the SOR development agreement. Based on the DEIR it appears the JUHSD project has changed since the City Council last discussed it at a public meeting. We would like to know what's included in the development agreement. Please also provide the time line for completing the development agreement.

> **Response E.1:** The development agreement is in draft form as it is being negotiated between the City and applicant. The off-site improvements contemplated in the development agreement are described in the Draft EIR Section 2.2.2.1., and the EIR has been written to cover the development agreement as one of the discretionary actions required for the project. The terms under negotiation do not involve physical improvements, but concern legal terms regarding risk allocation and other non-tangible issues. There is no potential for these negotiations to alter the physical scope of the project and affect the project's environmental analysis.

Comment E.2: I noticed that the links provided in NOP letters are not working in the DEIR. Please provide working links here:https:ljlink.edgepilot.com/s/38461664/bBzNCQrJdkCXS4pt-hPSzA?u=https://www.dalycity.org/DocumentCenter/View/7812/Appendix-ANOP-Comments?bidId%3D.

I mean the links included in various NOP letters are not working, they are published here: https://link.edgepilot.com/s/38461664/bBzNCQrJdkCXS4pt-hPSzA?u=https://www.dalycity.org/DocumentCenter/View/7812/Appendix-A-NOPComments?bidId%3D.

The public should be able to click on working links provided in NOP letters. It appears you stripped out all the links so we cannot read the letters as they were intended by the sender.

> **Response E.2:** Links in the NOP letters on the City's website were fixed.

Comment E.3: The links appear to be working now.

Are you planning to include letters from the NAACP, other organizations and individuals?

Link to Sierra Club Letters:
https://link.edgepilot.com/s/cffab6ee/csUuYiF8BkmXPnlroHo1WA?u=https://www.communitygardenalliance.org/sierra-club-letters

Link to NAACP Letters:
https://link.edgepilot.com/s/4547fa78/MbR_Btrfn0GwUUU4G5b5Uw?u=https://www.communitygardenalliance.org/naacp-letters

Link to Pacifica Social Justice Letter:
https://link.edgepilot.com/s/f91f3444/nm5Xdq9mYU6tqDI4Mcm0sg?u=https://www.communitygardenalliance.org/pacifica-social-justice

Response E.3: The Sierra Club letter mentioned in the comment above is included in Appendix A of the Draft EIR. The two other letters from the NAACP and Pacifica Social Justice were sent a year after the initial NOP period between May 7, 2021 and June 7, 2021; therefore, they are not included in Appendix A, but are part of the public record for the project. None of the above letters include comments about the Draft EIR as they were written before the Draft EIR was circulated; therefore, no further response is required.

F. Grassetti Environmental Consulting (dated August 21, 2023)

Comment F.1: Grassetti Environmental Consulting (GECo) is submitting this comment letter on the Serramonte Del Rey Project Draft EIR on behalf of Pacifica Social Justice. As GECo's Principal, I have reviewed the document and offer comments on three issue areas: Project Description, Inclusionary Housing, and Alternatives. My experience includes over 40 years of preparing, reviewing, and teaching about the California Environmental Quality Act (CEQA) processes and documents. My qualifications are attached to this letter.

As detailed below, the DEIR is deficient in fully and accurately describing the project, its analysis of inclusionary housing policy conformance, and the range of alternatives considered in the document. In addition, the DEIR fails to correctly describe and characterize the use of, and potential impacts on, the approximately 1-2-acre community garden on the project site.

Response F.1: This is an introductory comment that summarizes the comment letters main concerns. Please refer to the responses below regarding specific issues raised by comment letter.

Comment F.2: Discussion

Project Description Issues

An “accurate, stable, and finite project description” “is the sine qua non of an informative and legally sufficient EIR.” (Save Our Capitol! v. Department of General Services (2023) 87 Cal.App.5th 655, 673.). Further, The project description shouldn’t supply extensive detail beyond that needed to evaluate the project’s environmental impacts, but should contain a sufficient degree of analysis to allow decisionmakers to make an informed decision intelligently considering environmental consequences; impact evaluation needn’t be exhaustive, and is reviewed in light of what is reasonably feasible, with courts looking not for perfection, but adequacy, completeness, and a good faith effort at full disclosure. (Tiburon, at 738, 726; CEQA Guidelines, §§ 15124, 15151.)

The DEIR’s Project Description describes in detail an entirely unrelated project (the District Offices Project – Figure 2.2-6) yet fails to identify any potential development plans on Areas C-F of the project site. That said, the hydrology section includes impervious/pervious surface calculations down to the exact square foot. Similarly, the noise analysis identifies each specific piece of equipment and duration of operation for each of the project phases.

Response F.2: The JUHSD District Office and Adult Education site plan shown on Figure 2.2-6 of the Draft EIR was included to disclose that the existing demonstration garden would be replaced at JUHSD’s new adult education building. The proposed Precise Plan is described in Section 2.2.1 of the Draft EIR (pages 3-10) and development plans for Parcels C-F are shown in Table 2.2-1 of the Draft EIR (page 4). The post-construction impervious/pervious surfaces calculations are based on preliminary open space, infrastructure, and building layouts provided by the applicant. Construction equipment identified in the air quality and noise analyses are based on CalEEMod defaults for the proposed project type (e.g., residential, commercial), size, and acreage. The project applicant provided the anticipated construction phasing and duration of the project. Please also refer to Master Response 4: Project Description above.

Comment F.3: The Precise Plan is available on the District’s website (https://www.juhsd.net/site/handlers/filedownload.ashx?moduleinstanceid=5196&dataid=8067&FileName=Serramonte%20Del%20Rey%20Precise%20Plan_Draft%20Precise%20Plan.pdf) yet it is not described in the DEIR, which includes only the parcel plan (Figure 2.2-5) and Area B plans from the Precise Plan. The DEIR fails to show even the most basic development plans other than for Areas A and B – no access improvements, no infrastructure improvements, no general site layout, no maximum building heights, nothing.

Response F.3: Please refer to Master Response 4: Project Description above.

Comment F.4: Further, the Precise Plan shows most of the trees surrounding the site being retained (see, for example, Figures 3.4, Street Frontage, and 4.2, Vehicular Circulation in the Precise Plan). In fact, the Precise Plan states,

> "A distinguishing feature of the Precise Plan are the hillsides to the west and east of the plan area which contain numerous trees, all trees planted as part of development of District property. Trees range from young to mature, are in varying health and are densely planted. The intent is to care for the hillside wooded areas to reduce fire hazards, enhance existing vegetation and promote urban forestry. A tree succession plan for aging mature trees will guide the replacement of existing trees over time due to age or fire vulnerability. Removed trees will be replaced with a diverse plant ecology governed by the area's unique coastal/Mediterranean climate including evergreen and deciduous species."

However, the EIR analyses appear to assume that most of the existing trees (and the community garden) will be removed. Similarly, the visual simulations contained in the Precise Plan also show them being removed. The DEIR Project Description is mute on the topic. These contradictions and lack of detail in the DEIR result in an unstable Project Description, which is inadequate for the environmental analysis.

> **Response F.4:** The proposed Precise Plan does not include detailed site plans for Parcels C-F; therefore, the number of trees to be removed or preserved is currently unknown, but will be defined as applications for specific buildings are filed for each parcel. Specific tree removal and planting details are available for the Parcel B Development Project and is described in Section 2.2.2.2 of the Draft EIR (page 16). The Draft EIR assumes some tree removal will be necessary to construct the proposed project and impacts related to tree removal are discussed under Impact BIO-5 in Section 3.4 Biological Resources of the Draft EIR (page 68). As described in the Draft EIR, pursuant to Municipal Code Chapter 12.40 – Urban Forestry, the City does not regulate the removal of trees except those within the public right-of-way, therefore the removal of trees on the school campus would not conflict with a local tree preservation policy. The Draft EIR further describes that the project is committed to replacing any removed trees at a 2:1 ratio.
>
> It is not clear what visual simulation the comment is referring to; however, on page 19 of Appendix B (draft Precise Plan) to the Draft EIR, a visual simulation shows the proposed project with the existing trees transparent in order to provide a better understanding of the project. The project does not propose to remove all existing trees surrounding the site.

Comment F.5: Failure to Accurately Consider the Land Use Impacts of the Community Garden and Groves of Mature Trees Surrounding the Site.

A review of comments submitted to the City in response to the Notice of Preparation and prior to that time indicates that the Community Garden that has occupied a portion of Parcel D for decades is an important land use. Representatives of the Native American community have also stated that it is important as a cultural resource (https://www.change.org/p/juslyn-manalo-save-mystic-community-garden), and over 4,000 community members have identified it as a unique and valued

land use. Yet the DEIR fails entirely to accurately characterize this land use and therefore fails to correctly identify the significance of its loss. The proposed extirpation of the garden represents a significant land use impact.

> **Response F.5:** Please refer to Master Response 1: Demonstration Garden, Master Response 5: , Master Response 6: Recreation, and Master Response 7: Tribal Cultural Resources above regarding impacts related to removal of the Demonstration Garden.

Comment F.6: The EIR blindly uses only the Initial Study Checklist as its significance criteria. However, the Courts have ruled that even if a project impact is not identified in the Checklist questions, it must be considered (see: Protect the Historic Amador Waterways v. Amador Water Agency, 116 Cal.App.4th 1099, 2004). Therefore, loss of important land uses also should be considered as a land use impact, as it is a physical impact on the environment. In this case, there is substantial evidence on the record that the garden comprises a unique and highly valued community open space, cultural, and educational resource. The EIR must fully identify and consider the land use, cultural, educational, and agricultural value of the garden and forest of mature trees surrounding the site, and the significance of their loss as a land use impact. Further, as discussed below, one or more alternatives that preserve the garden must be added to the EIR.

> **Response F.6:** Please refer to Master Response 1: Demonstration Garden, Master Response 6: Recreation, Master Response 7: Tribal Cultural Resources, and Master Response 8: Alternatives above. Impacts related to agriculture and trees are discussed in Sections 3.2 and 3.4 of the Draft EIR.

Comment F.7: Failure to Adequately Consider Wetlands Habitats

The DEIR states (p.67):

> While the Biological Resource Assessment identifies the presence of wetland features, it does not reach a definitive conclusion about the meadow qualifying as a jurisdictional wetland and recommends a formal wetland delineation be performed prior to project implementation to allow the US Army Corp and/or the Regional Water Quality Control Board to determine whether to assert jurisdiction over the meadow as a wetland. The Biological Peer Review, however, agrees with the findings of the Wetland Assessment and concludes that the meadow would not qualify as a jurisdictional wetland under the Clean Water Act or Porter-Cologne Act.

CEQA does not care about legal definitions of jurisdictional wetlands. It cares about the habitat values afforded by the wetlands. The DEIR finds no impact on wetlands solely on the basis of legal administrative classifications. Please revise to address the impacts associated with the actual habitats.

> **Response F.7:** Please refer to Master Response 5: Wetlands above.

Comment F.8: Project Non-Conformance with RHNA and City Inclusionary Housing Ordinance

As noted in numerous comments on the NOP, including comments from the City's Director of Economic and Community Development, Housing and Community Development Supervisor, and Housing Coordinator (Memo from the above to the Mayor, Affordable Housing Community, and Councilmember Glenn Sylvester, November 15, 2021) the project fails to conform with the City's inclusionary housing ordinance:

> The affordable housing proposed by JUHSD for the Serramonte Del Rey site is not strictly consistent with the terms of the City's Inclusionary Housing Ordinance in two ways:
>
> 1. The City's Inclusionary Housing Ordinance requires that affordable units are phased in at the same time as market rate units. Subsequent to the development of housing for District staff on Parcel A, the JUHSD proposal envisions completion of 201 market rate units on Parcel B before any affordable housing units for the general public are developed. The result of this phasing is that the 20 inclusionary units required from the 200 units developed on Parcel B, would be delayed for an estimated two years until the 100 affordable units are Parcel C are constructed.
> 2. The City's Inclusionary Housing Ordinance requires that affordable units are physically distributed equally through a development. In the JUHSD proposal, the majority of the affordable units would be concentrated on one of six parcels.

The EIR must address this non-conformance, which brings the project further into conflict with its own objectives, discussed above.

Further, the project would do nothing to achieve, the City's compliance with its RHNA objectives. According to RHNA Plan, Daly City is allocated a total of 4,838 total housing units. This includes 1,336 very-low-income units, 769 low-income units, 762 moderate-income units, and 1,971 above-moderate-income units. The proposed project's minimal provision of affordable units makes it nearly impossible for the City to achieve its overall RHNA requirement of about 43% very-low and low-income units. The project's 1235 units comprise about 26 % of the 4838 total units, but it proposes to provide only 6% of the required affordable units. This means that future residential development in the City would be required to exceed 50% affordable units in order to meet its RHNA/Housing Element requirements. Table HE 49a in the Draft Housing Element shows this shortfall. Instead of helping the City meet its RHNA requirements, the project further impedes this. The EIR should describe conformance with the RHNA/Housing Element this would be achieved.

> **Response F.8:** Please refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment F.9: Project Objectives Deficiencies

Project objectives inform, in part, the selection of project alternatives. Alternatives are intended to reduce potentially significant project impacts while achieving most of the project objectives (Guidelines Section 15126.6 (a)). One of the project objectives is to maximize affordable housing, yet, as discussed above, the project includes the minimum number of affordable units per the City's Inclusionary Housing ordinance, fails to comply with the unit distribution and timing components of that ordinance, and substantially impedes the City's compliance with its own RHNA requirements. Further, as detailed above, the project makes it nearly impossible for the City to achieve its RHNA affordable housing requirements. In this case, the project does not meet its own objective.

Response F.9: The project objectives are defined by the applicant JUHSD's goals for the proposed project. The objective the commenter appears to be referring to is to "Maximize the number of new high-quality market-rate and affordable housing units as a well-designed, economically feasible, urban residential neighborhood with sufficient density to create a safe, active neighborhood, with development phasing subject to market conditions that provides flexibility with the sequence of construction of buildings, open space, streets, and infrastructure." (page 210). The project provides 20 percent affordable units, twice the City's minimum requirement that 10 percent of the units be affordable, therefore, the comment is incorrect in stating the project provides the minimum amount of affordable housing, and would not contribute to the City's RHNA goals. Please also refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment F.10: Inadequate Range of Alternatives

The project includes only the no-project alternative, with variants for existing conditions and future development conditions. It then identifies the latter no-project alternative variant as the CEQA-mandated environmentally superior alternative. Per CEQA Guidelines Section 15126.6(e)(2), the two variants comprise the CEQA-mandated No Project Alternative. This minimal range of alternatives fails to meet CEQA's requirement of a reasonable range of potentially feasible alternatives that may reduce project impacts and meet most of the project objectives (Guidelines Section 15126.6(a)). Project-related impacts to vehicular emissions, noise, VMT, biological resources, and land use (i.e., impacts from removal of the community park and non-conformance with the RNHA) must be considered in selecting alternatives. At a minimum, given the potential land use and plan non-conformance issues discussed above, one or more alternatives that preserve the community garden (i.e. no development or reduced development in Parcel D), preserve the mature trees surrounding the property, and meet the City's Inclusionary Housing Ordinance and RNHA affordable housing mandates must be included.

Response F.10: Please refer to Master Response 8: Alternatives above.

Comment F.11: In addition, the City of Daly City is highly unbalanced in terms of jobs/housing, with under 0.5 jobs/resident. This means that residents need to travel longer distances to their jobs,

resulting in relatively high VMT levels. A project alternative that included a larger employment component (and also preserved the garden and trees) would further reduce project impacts, and should be added to the EIR.

Response F.11: Section 7.4.1.2 of the Draft EIR (page 212) considers but rejects a mixed-use alternative that included 230,000 square feet of office space and 1,035 residential units. This alternative would result in the same VMT per resident as the proposed project and result in a higher VMT per employee than the countywide threshold; thus, creating a new VMT impact compared to the proposed project. For these reasons, such an alternative would not be environmentally superior, and would not reduce project impacts as suggested by the commentor, and was rejected in the Draft EIR.

Comment F.12: Impermissible Environmentally Superior Alternative

CEQA further requires that an EIR to identify an environmentally superior alternative "among the other alternatives" if the no-project alternative is otherwise the environmentally superior alternative to the project (Guidelines section 15126.6(e)(2)). In this case there are no other alternatives from which to pick. One or more actual "environmentally superior" alternatives must be developed and analyzed in the EIR.

Response F.12: The environmentally superior alternative is picked from among the range of analyzed alternatives. As discussed in Master Response 8: Alternatives above, the City considered but rejected three alternatives and only found two alternatives to be feasible. The Draft EIR concludes the No Project Alternative, which assumes the site remains in its current condition, is the environmentally superior alternative. However, as noted in the comment, CEQA requires that when the No Project Alternative is determined to be the environmentally superior alternative, that an environmentally superior alternative be identified. Thus, the Draft EIR identifies the No Project – Existing Zoning Alternative, which assumes development of the site as allowed under current plans and policies and considering available infrastructure, as the 'next best' environmentally superior alternative. This alternative does not assume the site remains in its current condition, as opposed to the No Project -No Development alternative which retains the site as is. Developing the site in accordance with the existing zoning would be environmentally superior to the proposed project, for the reasons provided in Draft EIR Section 7.4.2.2.

Comment F.13: Conclusions

It is my professional opinion, supported by the facts summarized above, that the DEIR is inadequate to meet basic CEQA requirements, particularly with respect to its treatment of project alternatives. In addition, the project fails to meaningfully contribute to the City's RHNA affordable housing

allocation as described in the City's Draft Housing Element. The City should revise and re-circulate the DEIR for the statutory 45-day minimum review period.

> **Response F.13:** This is a concluding statement that references issues that were raised in prior comments, and were each responded to previously in detail; therefore, no further response is required.

G. Anonymous 1 (dated September 1, 2023)

Comment G.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
- Where the community grows herbs, fruits and vegetables
- lt is home to over 100 trees and many different animals, birds, butterflies
- The location has special significance and recognition for Native Ohlone Indians
- It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response G.1:** This comment advocates for preservation of the demonstration garden and does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Master Response 1: Demonstration Garden. The comment also expresses an opinion about cultural resources, but does not raise any issues about the adequacy of the Draft EIR analysis of such resources. Please refer to Master Response 1: Demonstration Garden, Master Response 6: Recreation, Master Response 7: Tribal Cultural Resources above.

Comment G.2: The Long Construction Timeline
- Last over 15 years? This is not fair to our community for quality of living.
- Air Quality with the fog and dust will linger on our cars and walkways
- Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

> **Response G.2:** As discussed under Impact AIR-2 and Impact AIR-3 in Section 3.3 Air Quality of the Draft EIR (pages 38-50), air quality impacts as a result of project construction would be below BAAQMD thresholds for construction period emissions and health risk with implementation of mitigation measures MM AIR-2.1 through MM AIR-2.3 and MM AIR-3.1, and the construction of the project would therefore have a less than significant impact on air quality. This analysis conservatively

assumed a six-year construction period, since compressing the total construction activity into a shorter period of time results in higher daily emissions than if the project were built over a longer period of time, Accordingly, assuming six years rather than fifteen years overstates the construction emissions, making the analysis in the Draft EIR inherently conservative. (page 41). While implementation of the campus redevelopment could take as long as 15 years, there would not be continuous heavy construction activity over that time, and emissions would be expected to be at a lower daily emission level than forecast in the Draft EIR. As each phase is implemented, there would be periods of intense construction activity specific to that phase for that portion of the site.

As discussed under Impact NOI-1 in Section 3.13 Noise of the Draft EIR (pages 135-141), the proposed project's construction noise could exceed ambient noise levels by five dBA or more; however, construction noise levels would not exceed the significance thresholds of 90 dBA Leq at any residential land uses or 100 dBA Leq at any commercial land uses surrounding the project site. In addition, the project shall implement mitigation measure MM NOI-1.1, which requires the project to implement additional best management practices to further reduce construction noise to a less than significant level.

H. Anonymous 2 (dated September 1, 2023)

Comment H.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response H.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment H.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

> **Response H.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

I. Anonymous 3 (dated September 1, 2023)

Comment I.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
- Where the community grows herbs, fruits and vegetables
- lt is home to over 100 trees and many different animals, birds, butterflies
- The location has special significance and recognition for Native Ohlone Indians
- It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response I.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment I.2: The Long Construction Timeline
- Last over 15 years? This is not fair to our community for quality of living.
- Air Quality with the fog and dust will linger on our cars and walkways
- Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

> **Response I.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

J. Anonymous 4 (dated September 1, 2023)

Comment J.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
- Where the community grows herbs, fruits and vegetables

• It is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response J.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment J.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Save the garden!

> **Response J.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

K. Chloe Costa Amado (dated September 1, 2023)

Comment K.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• It is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response K.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment K.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways

• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

> **Response K.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

L. Christina Francisco (dated September 1, 2023)

Comment L.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response L.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment L.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?
I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

I personally have been enjoying the garden since I moved in 2019. The welcoming vibe is amazing. Keep the good work Erick your work makes the difference.

> **Response L.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

M. Casey Quon (dated September 1, 2023)

Comment M.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response M.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment M.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

This is a great environment.

> **Response M.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

N. Catherine Van Etten (dated September 1, 2023)

Comment N.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response N.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment N.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Please don't destroy this environmental gem.

Response N.2: Please refer to Response G.2: above regarding air quality and noise impacts.

O. Eduardo Silva Amado (dated September 1, 2023)

Comment O.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response O.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment O.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Response O.2: Please refer to Response G.2: above regarding air quality and noise impacts.

P. Erick Campbell (dated September 1, 2023)

Comment P.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response P.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment P.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Response P.2: Please refer to Response G.2: above regarding air quality and noise impacts.

Q. Javier Lopez (dated September 1, 2023)

Comment Q.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians

• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response Q.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment Q.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Save the Garden!

> **Response Q.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

R. Kerry Quendens-Bonham (dated September 1, 2023)

Comment R.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response R.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment R.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

My dogs and I enjoy relaxing in the gorgeous park when I get home from work. It's a shame that someone wants to ruin this awesome park.

Response R.2: Please refer to Response G.2: above regarding air quality and noise impacts.

S. Monica Costa Amado (dated September 1, 2023)

Comment S.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response S.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment S.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Response S.2: Please refer to Response G.2: above regarding air quality and noise impacts.

T. Monica Bidegain (dated September 1, 2023)

Comment T.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response T.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment T.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

I love the garden, it's a place where I find myself, when I need to lose myself! TO PLANT A GARDEN IS TO BELIEVE IN TOMORROW. SAVE THIS GARDEN.

Response T.2: Please refer to Response G.2: above regarding air quality and noise impacts.

U. Matthew Piccardo (dated September 1, 2023)

Comment U.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response U.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment U.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Daly City resident for 49 years.

> **Response U.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

V. Patrick Robertson (dated September 1, 2023)

Comment V.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response V.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment V.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?
I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

I've been coming to this beautiful garden for the past 15 years. I've seen a beautiful place grow. Kids growing…

How much money is really enough… When you need to get away from the work where do you go… Come by the garden with your lunch and some music and enjoy the real garden experience.

Response V.2: Please refer to Response G.2: above regarding air quality and noise impacts.

W. Shasta Student 1 (dated September 1, 2023)

Comment W.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables
• lt is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

Response W.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment W.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

Response W.2: Please refer to Response G.2: above regarding air quality and noise impacts.

X. Shasta Student 2 (dated September 1, 2023)

Comment X.1: I am a resident of the Serramonte Ridge Apartments and will be greatly affected by the destruction of the Community Garden and the 15-year timeline in construction of this phased development.

Please SAVE The Garden
• Where the community grows herbs, fruits and vegetables

• It is home to over 100 trees and many different animals, birds, butterflies
• The location has special significance and recognition for Native Ohlone Indians
• It is an area that is shared and respected by people from all over Daly City along with students at Shasta High School by peacefully being in Nature

> **Response X.1:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Response G.1 above.

Comment X.2: The Long Construction Timeline
• Last over 15 years? This is not fair to our community for quality of living.
• Air Quality with the fog and dust will linger on our cars and walkways
• Constant Noise of Construction on weekdays 8-5pm with many of us working remotely or trying to get day sleep for those of us who work in the service industry?

I understand that this is the Environmental Review of the Project --- but my health and Safety living and renting thru this project development should be a consideration.

> **Response X.2:** Please refer to Response G.2: above regarding air quality and noise impacts.

Y. Andrew Sielen (dated September 3, 2023)

Comment Y.1: My family and I moved to Daly City in 2020, we bought a house in Westlake and we plan on making it our forever home. One disappointment though is that this city does not seem to invest in community spaces and the school district is hostel to the community. Locking its gates to families who would benefit from some extra space for their kids to run around (and in the case of Westlake, the neighborhood was specifically built around the elementary school grounds as a park for neighborhood children, now it is just locked up and only used by the school a couple times a year) and now looking to destroy the only community garden in the city.

It is important to me that my son has exposure to where our food comes from, community gardens are a great opportunity to show him this. We have been attempting to grow vegetables in our backyard (photos attached) and frequent the seed bank at Westlake Library. Our foggy weather makes this difficult and we would benefit from a meeting ground such as this garden where we can meet and learn from our neighbors who have been doing this for years.
The school district has already taken out other community space when they decided to develop the land next to Westmoor High. Don't let them take this one away also. They are not a private corporation, and they should be accountable to us the tax payers. It is great we are building so much more housing, but without the community, we are just housing people who may live here but spend their lives in our neighbor cities like SF or South City. Let's make our city a place to thrive.

This city has so much promise, great neighbors and community but it needs some new energy, taking aways these spaces is going in the wrong direction. We don't want to go in the direction of SF.

As my family and I establish our roots in this city, we look forward to getting more engaged.

Response Y.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Z. Emma Hartung (dated September 4, 2023)

Comment Z.1: I am writing to comment on the Serramonte Del Rey Redevelopment DEIR and to urge you to oppose the demolition of Daly City's only community garden. The DEIR makes it clear that this project would have detrimental impact to local habitat that is already severely limited by negatively impacting foliage, wetlands, wildlife habitat and the creek. This community garden is a resource that is crucial to the local community. I hope that Daly City will reflect on these negative impacts found and act swiftly to preserve the garden in recognition of the critical environmental and social resources that it provides.

Response Z.1: Please refer to Master Response 1: Demonstration Garden above.

Further, as discussed in Section 3.4 Biological Resources of the Draft EIR (pages 54-70), the project would result in a less than significant impact on special-status species through implementation of mitigation measures MM BIO-1.1 and MM BIO-1.2. In addition, the Draft EIR concluded, based on biological studies, that there is substantial evidence that there are no wetlands or riparian areas on the project site that are protected under federal or state law. Please refer to Master Response 5: Wetlands above.

AA. Melissa Kallstrom (dated September 6, 2023)

Comment AA.1: Visualize the place that you go that brings you peace and helps calm your mind and soul, the Daly City Community Garden is that place for me and many people and their families. This garden is the only community garden in Daly City which has less than 5% of the urban canopy of trees that cover our city (Excellence, 2020). This unique garden is located across from the Jefferson High School District building and is part of the Serramonte Del Rey Campus Development. This only green space includes over 100 redwood trees, 100 fruit trees, and native trees that include Douglas Firs, Madrones, Buckeyes, Live Oak, White Oak, Catalina, and Ironwood trees.

Response AA.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Master Response 1 above.

Comment AA.2: The Mission Blue Butterfly has also found a home in our garden and because of habitat loss in response to land degradation as a result of housing and retail development, this beautiful species is almost extinct and, on the Fish and Wildlife website is categorized in red as endangered (Endangered Species, 2023). I have seen these butterflies' multiple times in the garden with Erik, the caretaker. What will happen to the ecosystem if the small piece of land is destroyed to build more apartments which are for market rate and more retail stores, has the city noticed that retail industry has taken a financial hit which will just be more stores that are empty, once the development is finished. Daly City residents will also not be able to afford to live in these for market rate apartments and the affordable housing that we are promised is under the requirements of percentage that is necessary. They will also have one building out of the five that will house all the affordable housing, that should be considered discrimination.

Response AA.2: Please refer to Response DD.6: below, and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment AA.3: I have lived at the Serramonte Ridge Apartments since January 2015, and I have been going to the garden soon after I moved in. My son attends Summit Shasta High School, he started his freshman year at Shasta High School in 2020 during Covid and the garden became our sanctuary since we could not leave our apartment. He currently is a senior and is in his last year of high school. Throughout the time that we lived at Serramonte Ridge, together we planted potatoes, sun flowers, peas, green beans, beets, rosemary, and sage. I am a single mom, and this food source helps with our food expenses. People from the community that go to the garden, leave with fresh fruit, vegetables, and herbs that are completely free and so fresh, garden to table.

The garden is a place for kids of all ages to go and spend time with friends and family, this is especially important for high school kids. My son goes and hangs out with friends or works in the garden, he has helped build fences, learned about landscaping, and even has a plot where he has planted different types of lettuce. It puts my mind at ease knowing that he is in the garden and not out running the streets causing trouble. Shasta High School also has a plot for the students to grow a variety of plants, vegetables, and herbs. This opportunity gives them hands on learning that they will take with them long after graduation. Global warming is a threatening presence, and the youngest generations are dealing with how to help, and the garden will teach them the importance of ecology and conservation.

Change.org has a petition of over 4,500 signatures of people agreeing to Daly City's need of this community garden, mother nature has an amazing resilience to the harm humans have caused but the time to help her is of extreme importance for all things living. Nature is a healing spiritual resource for anyone that can enjoy the magic and the healing nature of places like the Daly City Community Garden. The earth has an adaptable nature but if all of nature has been turned into developments of apartments and office space with an area on top of a parking garage, that does not have the resource of over twenty years of growth in that location, and nature will not have the ability to heal itself or us. I request that you read this letter and all the letters you receive, in the Daly City Community Garden. It might open your mind and the minds of the people that are in

support of this development. Instead of following the dollar signs, listen to the community that is seeing the signs that this earth will not be able to continue in its destruction.

Thank you for your time working with us and for reading my letter.

> **Response AA.3:** This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Master Response 1 above.

BB. Catalina Gomes (dated September 6, 2023)

Comment BB.1: My name is Catalina Gomes and I am a descendant of the Ramaytush people from Timigtac Village site near Calera Creek. I am writing to express the need to protect the Daly City Community Garden which is situated nearby the land my ancestors lived. There has been a long Indigenous history on that land - most of which has been obscured, erased, and violently destroyed. Given the historical context and what little remains, it is of the utmost importance that this garden not also be destroyed for the benefit of a private development opportunity.

> **Response BB.1:** The demonstration garden has no relationship to the pre-contact tribal habitation of the area, as the demonstration garden is a recent, modern feature installed by the JUHSD, as discussed in Master Response 7: Tribal Cultural Resources above.

Comment BB.2: Being the only community garden in Daly city, it provides much needed green space (most of which is rapidly disappearing) while also acting as a food source for people who are food compromised. Filled with native trees, established fruit trees, soil that has been built over years, and a diverse array of wildlife that has built complex interspecies relationships, replacing this would certainly not be achievable with a few raised beds as it would take decades to replace the mature trees that would be destroyed by this proposed development.

> **Response BB.2:** Please refer to Master Response 1: Demonstration Garden above.

Comment BB.3: Daly City is in great need of an urban forest. There are several other phases of this project that could take place without the destruction of this vital, thriving, living asset to the community! Not only as a green oasis, in an urban setting, but also as a place of cultural relevance. As the site of decades, if not thousands of years of Indigenous ceremonies. I am hopeful that you take advantage of this opportunity to protect this garden that is of great value to the community at large!

> **Response BB.3:** There is no evidence to suggest the site of the demonstration garden was used for pre-contact Native American ceremonies, as the site had been a sloping hillside prior to the extensive grading that was completed to construct the school campus. Please refer to Master Response 7: Tribal Cultural Resources above.

This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

CC. Cossart-Daly Law, A.P.C. (dated September 7, 2023)

Comment CC.1: Cossart-Daly Law, A.P.C. represents the Loma Prieta Chapter of the Sierra Club ("Sierra Club") with respect to the Serramonte Del Rey Campus Redevelopment Draft Environmental Impact Report.

The Loma Prieta Chapter of the Sierra Club offers local members and supporters opportunities to actively contribute to the environmental work of the Sierra Club, which promotes the responsible use of the earth's ecosystems and resources, and aims to protect and restore the quality of the natural and human environment. Sierra Club has a strong interest in addressing the environmental and environmental justice impacts of development projects, including the proposed Serramonte Del Rey Campus Redevelopment in Daly City (the "Project"). Cossart-Daly Law, A.P.C. submits the following comments on the Draft Environmental Impact Report ("DEIR") on Sierra Club's behalf.

The Project is a massive undertaking that will result in significant environmental impacts. In order to construct the Project, the City of Daly City ("City") developed an approximately 22- acre Serramonte Del Rey Precise Plan ("Precise Plan") unique to the Project, as well as a specific development proposal for an approximately 4.3-acre Parcel B within a portion of the Precise Plan. (DEIR p. iv.)

The Project, as proposed, would include a project site area with "up to" 1,235 units of affordable and market-rate rental housing. (DEIR p. iv.) Affordable housing would primarily be segregated into Parcels A and C. (DEIR Appendix A, p. 14; Jefferson Union High School District, The Serramonte Del Rey Neighborhood, available at https://serramontedelrey.org/masterplan/.) The Project would also include "up to" 14,000 square feet of retail or commercial use area. (Ibid.) 22 acres of the Project site would be used to construct "up to" 1,113 units of affordable and market- rate rental housing, in addition to the 122 currently-existing units on Parcel A. (Ibid.) It would also include the construction of a mixed-use building with 201 residential units and approximately 8,000 square feet of retail space including two levels of parking on a 4.3 acre portion of the site. (Ibid.) There is a long standing Community Garden, a wetland, many trees, and greenspace, including a meadow, located on the Project site. (DEIR, pp. 10, 67, Figs. 2.2-5, 3.4-1.) The Community Garden and a majority of the parcel's green space is located on Parcel F. (See DEIR Fig. 2.2-5.) According to the DEIR, "[t]he proposed Precise Plan would remove the existing garden and use the space as a construction staging area until Parcel F is fully developed with up to 400 units and 6,000 square feet of retail uses." (DEIR, p. 10.) This would result in the destruction of the Community Garden, the wetland, and a majority, if not all, of the green space located around the Community Garden.

This Project will create significant environmental impacts, and thus requires a careful, complete and thorough environmental analysis under the California Environmental Quality Act ("CEQA"). "CEQA was enacted to advance four related purposes: to (1) inform the government and public about a proposed activity's potential environmental impacts; (2) identify ways to reduce, or avoid,

environmental damage; (3) prevent environmental damage by requiring project changes via alternatives or mitigation measures when feasible; and (4) disclose to the public the rationale for governmental approval of a project that may significantly impact the environment." (Union of Medical Marijuana Patients, Inc. v. City of San Diego ["Union of Medical Marijuana Patients"] (2019) 7 Cal.5th 1171, 1184, citing California Building Industry Assn. v. Bay Area Air Quality Management Dist. (2015) 62 Cal.4th 369, 382.) "CEQA embodies a central state policy to require state and local governmental entities to perform their duties 'so that major consideration is given to preventing environmental damage.'" (Union of Medical Marijuana Patients, supra 7 Cal.5th at 1185, citing Friends of the Eel River v. North Coast Railroad Authority (2017) 3 Cal.5th 677, 711- 712.)

As explained herein, the DEIR mischaracterizes the Project setting, relies on an unstable Project description, and does not provide an adequate analysis or mitigation for impacts to Biological Resources, Recreation, or Land Use. Most importantly, the DEIR alternatives analysis is insufficient because it does not include nor adopt an alternative that would disperse affordable housing throughout the Project and preserve the Community Garden, wetland, and surrounding green space. Please remedy these deficiencies as outlined and requested below in order to ensure that the environmental review documents for the Project comply with CEQA.

> **Response CC.1:** This is an introductory comment and restates the proposed project. The comment raises general concerns regarding the Draft EIR that are the subject of more detailed comments that follow, for which responses are provided. No further response is required.

Comment CC.2: I. The DEIR's Description of the Project Site is Inaccurate, As it Mischaracterizes the On-Site Community Garden, Wetland, and Greenspace.

According to the CEQA Guidelines, an EIR must correctly describe the environmental setting for the project. (14 Cal Code Regs § 15125(a), (c); San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal. App. 4th 713, 726 [voiding EIR for failure to contain accurate site description].) The description of the environmental setting should include "the area in which significant effects would occur either directly or indirectly as a result of the project." (Id. at § 15360.) These existing physical conditions "will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." (See Neighbors for Smart Rail v Exposition Metro Line Constr. Auth. (2013) 57 C4th 439, 448, Communities for a Better Env't v South Coast Air Quality Mgmt. Dist. (2010) 48 C4th 310, 320.) "[S]pecial emphasis should be placed on environmental resources that are rare or unique to the region and that would be affected by the project." (14 Cal Code Regs §15125(c).) "The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." (Id. at §15125(a).) Courts and lead agencies "must interpret the Guidelines to afford the fullest possible protection to the environment." (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 720.)

Environmental conditions must be described as they exist. (Id. at §15125(a).) Including a correct and pertinent description of existing environmental resources is critical for a DEIR to comply with CEQA. (See San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal. App. 4th 713, 726; Sierra Watch v County of Placer (2021) 69 Cal. App. 5th 86; League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer (2022) 75 CA5th 63, 97.) Without correct and comprehensive information of environmental resources that will be potentially impacted, the lead agency cannot correctly assess significant impacts nor what measures, if any, could mitigate these impacts. (See ibid.)

As described herein, the DEIR mischaracterizes the Project site. It states that no sensitive plant or animal species have been observed onsite, when several endangered or special status species have been observed on and around the Community Garden, wetland, and open space located on Parcel F. (Compare DEIR p. 61, 62 with Exhibit A, Althouse and Meade, Inc. Correspondence, pp. 2-4.) The DEIR indicates that there is a wetland onsite, but fails to describe how this wetland may or may not support riparian habitat, what it entails, and what wetland- specific species exist on site. (Compare DEIR, p. 59 with Exhibit A, Althouse and Meade, Inc. Correspondence, pp. 2-4.)

> **Response CC.2:** The issues raised by the comment concerning the environmental conditions on the site are based on detailed comments provided by another party who commented on the Draft EIR, for which responses have been provided below. Please refer to Response DD.4: through Response DD.9: below regarding wetlands and special-status species.

Comment CC.3: The DEIR also does not adequately describe the Community Garden. The Biological Resources Environmental Setting only briefly mentions the Community Garden, and does not discuss its function or importance in supporting sensitive species. (See DEIR, p. 59 ["although native plant species are present in the Demonstration Garden as a result of being planted by gardeners…"]). But, as further explained herein, the Community Garden and the surrounding trees and open space serve as important habitat for sensitive species, an important wildlife corridor, and important urban "green space [which] supports a diverse array of nesting habitat with varied vegetation strata to support cavity-, ground-, shrub-, and canopy-nesting birds." (See Exhibit A, Althouse and Meade, Inc. Comment Letter, p. 10.)

> **Response CC.3:** The issues raised by the comment concerning the biological habitat value of the demonstration garden are based on detailed comments provided by another party who commented on the Draft EIR, for which responses have been provided below. Please refer to Response DD.2: and Response DD.13: below regarding sensitive natural communities and wildlife movement corridors.

Comment CC.4: What's more, the DEIR downplays the important recreational, historic, and community functions of the Community Garden. The DEIR's only full description of the Community Garden states:

> There is an approximately 0.5-acre school demonstration garden located in the southwest corner of the Precise Plan area. This garden was started 20 years ago and used by JUHSD for adult education as a demonstration garden. In 2019, the garden was listed as a "community garden" by the County of San Mateo; however, the listing occurred without the knowledge or permission of JUHSD leadership, and therefore the garden was removed from the list. (DEIR, p. 10.)

The Community Garden has not been used as a "demonstration garden," as claimed by the DEIR, but has existed as a community garden, open to the public, for an extended period of time. (See Exhibit B, video from CBS Bay Area, Daly City Housing Development Squeezing out Beloved Community Garden, available at https://www.cbsnews.com/sanfrancisco/news/daly-city-housing-development-plans-squeezing-out-beloved-community-garden/?intcid=CNM-00-10abd1h; see also Exhibit C, Petition, Help Save Daly City's Only Community Garden.) Residents of the Serramonte Ridge Apartment Homes, adjacent to the Project Site, have used the Community Garden since the construction of Serramonte Ridge in the 1980s. (See Figure 3.17-1; Serramonte Ridge Renters Association September 26, 2021 Comment Letter, available at https://static1.squarespace.com/static/52a4b6b8e4b020f5799aacd9/t/623f69221e2f0172f42a9e8/1648322851095/Serramonte+Ridge+Renters+Association+Letter+to+City+of+Daly+City+v.3.pdf.) The DEIR, likewise, does not discuss or disclose that the Community Garden is Daly City's only community garden, or that the Community Garden provides a unique space which permits community members to grow culturally relevant foods, provides access to gardening for those who would not otherwise have it, and provides on open space for indigenous community members to hold religious ceremonies. (See Exhibit C, Petition, Help Save Daly City's Only Community Garden; Sierra Club August 12, 2021 Comment Letter, available at https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/loma-prieta chapter/conserveletters/Letter%20to%20David%20Canepa%208.13.21.pdf.)

> **Response CC.4:** Please refer to Master Response 1: Demonstration Garden above.

Comment CC.5: As discussed herein, removal of the Community Garden will result in significant impacts to habitat for sensitive and endangered species and on recreation. Because the DEIR mischaracterizes the Community Garden, it does not analyze the removal of the Community Garden as having a significant impact on Biological Resources, and does not provide appropriate mitigation for such impacts.

> **Response CC.5:** Please refer to Response DD.2: below regarding sensitive natural communities and Response DD.3: through Response DD.9: below regarding special-status species. In addition, please refer to Master Response 6: Recreation above.

Comment CC.6: If the City adopts the DEIR without updating the description and analysis of the wetland, open space, and Community Garden, it will violate CEQA. In order to comply with CEQA, please update the DEIR to accurately reflect the function, history, and use of the Community Garden, and conduct adequate studies on and identify the sensitive species that currently exist

within the wetland, open space, and Community Garden. Please also characterize the impact of removing the Community Garden on biological resources as significant, and fashion mitigation and/or an alternative that preserves the Community Garden space, wetland, and open space in Parcel F as discussed in this correspondence's Alternatives discussion, in order to avoid significant environmental impacts.

Response CC.6: Please refer to Master Response 1: Demonstration Garden, Master Response 6: Recreation, and Master Response 8: Alternatives above. In addition, please refer to Response DD.2: below regarding sensitive natural communities and Response DD.3: through Response DD.9: below regarding special-status species.

Comment CC.7: II. The DEIR Does Not Include an Accurate or Finite Project Description.

"Only through an accurate view of the project may affected outsiders and public decision- makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative), and weigh other alternatives in the balance." (County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 192-193 ["County of Inyo"].) "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (Id. at p. 193 [italics omitted].)

The Project description is anything but finite or stable. The Project includes both "the development of a new approximately 22-acre Serramonte Del Rey Precise Plan" and "a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan." (DEIR, p. iv.) The majority of the Project description does not designate specific plans, numbers of buildings to be constructed, or other relevant information for the Project. Most of the Project description hedges as to what the Project will actually include. For example, the Precise Plan would permit "up to" a certain amount of units, "up to" a certain amount of retail/commercial uses on several parcels. (DEIR, p. iv.) Likewise, except for Parcels A and B, the Project would allow "up to" or a "maximum" of a certain number of units on each individual parcel. (Id. at pp. 3-4.) The DEIR explains that Parcels C-F "may" provide retail/commercial space. (Id. at p. 4.) The Precise Plan, appended in Appendix D, provides development guidelines, but does not provide more clarity or information on specifically what will be developed on the Project site, including what type of development will be constructed, when and if additional facilities will be constructed, etc.

As the DEIR relies on a nebulous Project description, it does not and cannot provide an accurate analysis of the Project's impacts to Biological Resources, Land Use, Traffic and Circulation, Global Climate Change, Air Quality, or a complete discussion of Project alternatives. Please update the DEIR to provide a specific number, square footage, size, and location of facilities and buildings that will be included in the Project, and reflect how this data alters the evidence, project impacts, mitigation and alternatives in a Recirculated DEIR.

Response CC.7: Please refer to Master Response 4: Project Description above.

Comment CC.8: III. The DIER's Conclusions Regarding Biological Resources Are Based on Insufficient Research and Analysis, and thus Are Not Supported by Substantial Evidence.

When conducting an environmental impact analysis, an agency's findings must be supported by evidence in the record. (Cal. Code Civ. Proc. § 1094.5 [providing that agency findings must be supported by record evidence]; Cal. Pub. Resources Code § 21168 [applying the Section 1094.5 standard to CEQA actions].) An agency's failure to do so constitutes an abuse of discretion and must be reversed by a reviewing court. (See ibid.)

A. A. The DEIR's conclusion that there are no sensitive natural communities onsite is not supported by substantial evidence.

The DEIR asserts that there are no sensitive natural communities, including riparian or wetland communities, present within the project site. (DEIR, p. 59.) This is not based on substantial evidence, or an accurate description of the wetland habitat. The DEIR does not adequately describe nor provide any study of such wetland habitat, though the DEIR mentions a wetland, community group Community Garden Alliance has provided evidence of a wetland onsite, and, according to expert biologists from Althouse and Meade, Inc., the Native Arroyo Willow thickets "clearly indicates that surface and shallow groundwater is present in sufficient quantities to support hydrophytic plants." (See DEIR, p. 67; Exhibit A, Althouse and Meade, Inc. Correspondence, p. 3; See Community Garden Alliance, Wetland, available at https://www.communitygardenalliance.org/wetland [videos of wetland onsite].) Expert Biologists Ms. Guttilla and Mr. Magney explain "[w]etland habitats are documented as present onsite," and provide numerous significant wetland functions. (Id. at p. 4.) The DEIR likewise states "The Biological Resource Assessment (see Appendix D), Biological Peer Review (see Appendix F), and Wetland Assessment (see Appendix E) all agree that the approximately 865 square foot meadow in the southwest corner of the project site appears to contain wetland features." (DEIR, p. 67.)

Yet the DEIR fails to conduct any study of the wetland because they claim that any such wetland must be manmade. However, "While the recent Supreme Court decision about Clean Water Act jurisdiction may have eliminated U.S. Army Corps of Engineers (Corps) jurisdiction on the wetlands onsite, wetland habitat is still present and represents a sensitive habitat that provides numerous functions (Brinson 19931, Brinson et al. 19952) and would be considered significant." (Exhibit A, Althouse and Meade, Inc. Correspondence, p. 4.) "[A]ll wetland habitats, including willow wetlands, in California are considered sensitive habitats because they have been reduced in area by over 90% and because they provide habitat for a wide variety of native species of wildlife." (Exhibit A, Althouse and Meade, Inc. Correspondence, p. 3.) As such, the DEIR should characterize this area as a sensitive natural community, accurately state that the Project will impact such a natural community, and mitigate such impacts by relocating proposed construction and development away from the wetland.

Response CC.8: Please refer to Master Response 5: Wetlands above and Response DD.2: below regarding sensitive natural communities.

Comment CC.9: B. The DEIR findings that there are no sensitive, threatened, or endangered plant or animal species on site is not supported by substantial evidence.

The DEIR's conclusion that there are no sensitive, threatened, or endangered plant or animal species on site, and therefore, that the Project will not have significant biological resources impacts is not supported by the evidence, and is based upon incomplete biological analyses. (See Exhibit A, Althouse and Meade, Inc. Correspondence.) The DEIR's botanical surveys do not provide sufficient evidence to support a finding that there are no impacts to sensitive, threatened, or endangered plant or animal species on site. The DEIR's timed botanical surveys occurred outside the bloom period for native plants known to occur onsite and found in wetland and riparian communities. (Id. at p.3) It does not appear that DEIR biologists reviewed "sensitive plant species listed in CNDDB and CNPS rare plant inventory to determine if they would be in bloom during January, April, and June site visits to proposed project site." (Ibid.) Without the analysis, outlined herein and in Ms. Gutilla and Mr. Magney's comment letter, the DEIR cannot accurately conclude that there are no sensitive plant species on site.

Likewise, the DIER states that the Project will not have significant impacts on special status wildlife. (DEIR, p. 64.) But the DEIR's biological surveys were incomplete and did not target specific sensitive species likely to occur on site. The DEIR's "April and June field surveys were focused on the willow and meadow habitats. It does not appear that seasonal surveys for plants or wildlife were conducted to detect all potential plant or wildlife species that could occur onsite." (See Description in Exhibit A, Althouse and Meade, Inc. Correspondence, p. 13.) The Biological Resources Analysis mentions only a few species, and lacks "any lists of plants or wildlife observed onsite." (See ibid.) Without a list of species observed, the public and decisionmakers have no means to determine if the field surveys were sufficient. (Ibid.) DEIR biologists also did not conduct field studies specific to the Western Bumble Bee, Mission Blue Butterfly, special status mollusks, and red-legged frog, which, as described in Ms. Gutilla and Mr. Magney's letter, are likely to occur onsite. (See analysis in Exhibit A, Althouse and Meade, Inc. Correspondence, pp. 4-9.) Without such studies, the DEIR cannot accurately represent that such species are not present onsite. In addition, the DEIR mischaracterizes the Western Bumble Bee as having no protection status and states that it does not have habitat onsite. (Id. p. 62.) This is incorrect. "California Fish and Game Commission elevated its status, and the status of three other bumble bee species to be candidates as Endangered under the California Endangered Species Act since 2019," and suitable habitat for such species occurs at the Project site. (See Exhibit A, Althouse and Meade, Inc. Correspondence, p. 4.) The DEIR's conclusion that the Project will not have significant impacts on special status wildlife, therefore, is not supported by substantial evidence.

In fact, the evidence demonstrates that sensitive species exist, or have a high probability of existing onsite in the Community Garden, the wetland, and the open space located on and around Parcel F. (Compare DEIR Fig. 3.4-1 with 2.2-5.) A plethora of Mission Blue Butterflies, which are on the Federal Endangered Species list, have been observed onsite; the site is rife with its host plant, Lupinus albifrons; and Mission Blue Butterfly are known to be present within a mile of the Project site. (Exhibit A, Althouse and Meade, Inc. Correspondence, p. 5; Exhibit D, California Department of

Fish and Wildlife, Threatened or Endangered Species Animal Species List; Garden Alliance Member Photos of Mission Blue Butterflies, available at https://spaces.hightail.com/space/Rnj8vgpFV0/files#pageThumbnail-1.) The site is also within the range of the California red-legged frog, which likewise are listed on the California Endangered Species List, and riparian habitat is present. (Exhibit A, Althouse and Meade, Inc. Correspondence, p. 5; Exhibit D California Department of Fish and Wildlife, Threatened or Endangered Species Animal Species List.) Special-status mollusks are also likely to occur on the Project site. (Id. p. 5, Table 3.) Community Garden Alliance volunteers have observed numerous species in and around the Community Garden which are candidates for, or included on, California and Federal threatened or endangered species, including the California Monarch Butterflies, Mission Blue Butterflies, Garter snakes, Bald Eagles, and Mountain Lions. (See Exhibit A, Althouse and Meade, Inc. Correspondence, Table 2.)

As such, destruction of the Community Garden, wetland, and surrounding greenspace on Parcel F will result in destruction of the habitat (whether man made or naturally occurring) for and harm to sensitive species and would result in a significant impact such species.

> **Response CC.9:** Please refer to Response DD.3: through Response DD.9: below regarding special-status species.

Comment CC.10: C. The DEIR's conclusion that the Project will not significantly interfere with wildlife corridors is not supported by substantial evidence.

What's more, contrary to the conclusions of the DEIR, destruction of this habitat will significantly interfere with wildlife corridors. (See description in Exhibit A, Althouse and Meade, Inc. Correspondence, p. 13.) According to Ms. Guttilla and Mr. Magney:

> that wildlife corridor function of open space/green belts in urban settings becomes significantly more important as natural habitats are reduced to disparate islands across the landscape. Keeping only mature trees on edge of property reduces cover for wildlife, making them vulnerable to predation, increased risk of collisions with vehicles, and pets. Increased infrastructure and resulting lighting and associated noise interferes with bat foraging activity and nocturnal wildlife. It reduces breeding and foraging habitat. (Ibid.)

The elimination of this greenspace will result in significant impacts to wildlife in an area with already limited open space and safe wildlife passages. The DEIR's conclusion that the Project will not impact wildlife corridors, therefore, is not supported by substantial evidence.

> **Response CC.10:** Please refer to Response DD.13: below regarding wildlife movement corridors.

Comment CC.11: D. The DEIR's does not provide appropriate, effective mitigation for impacts to nesting birds and special species bats.

As described in Ms. Guttilla and Mr. Magney's correspondence, the DEIR's conclusions that the Project would have a less than significant impact on nesting birds and bats with mitigation are also not supported by the evidence. (See Exhibit A, Althouse and Meade, Inc. Correspondence, pp. 10-12.) What's more, the mitigation provided in the DEIR is insufficient.

An agency "shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures," and must have a monitoring program to ensure the implementation of mitigation. (Cal. Pub. Resources Code, § 21081.6 (a) and (d).) "The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded." (California Clean Energy Committee v. City of Woodland (2014) 225 Cal.App.4th 173, citing Federation of Hillside & Canyon Associations v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1260-1261, Cal. Pub. Resources Code, § 21002.1(b) [emphasis in original].)

The DEIR provides that construction and demolition can proceed with no restrictions outside of nesting season and if there are no active nests identified during a construction survey period. (Id. at pp. 10-12.) As birds build nests outside of the typical nesting season and often do so on and around active construction sites, the DEIR's mitigation should be updated, as described in Ms. Guttilla and Mr. Magney's correspondence to protect nesting birds. (Ibid.) Likewise, the DEIR's mitigation to protect special status bats should be updated per Ms. Guttilla and Mr. Magney's recommendations. (See id. at p. 12-13.)

> **Response CC.11:** Please refer to Response DD.11: and Response DD.12: below regarding the suggested revisions to the Draft EIR's mitigation measures.

Comment CC.12: E. In order to comply with CEQA, the DEIR must be amended to recognize and mitigate the Project's significant impacts to Biological Resources.

Please conduct additional studies, consistent with the recommendations outlined herein and in Ms. Guttilla and Mr. Magney's correspondence, updated the DEIR to reflect the presence of sensitive species on site, update the DEIR's conclusions to recognize significant impacts to sensitive natural communities as well as sensitive plant and animal species, and provide mitigation that would preserve the Community Garden, greenspace, and wetland habitat.

> **Response CC.12:** The specific issues raised by Ms. Guttilla and Mr. Magney are addressed below in Responses DD.1 through DD.20.

Comment CC.13: IV. The DIER's Conclusion that the Project Will Not Have a Significant Impact on Recreation Is Not Supported by the Evidence.

The DEIR concludes the Project will have a less than significant impact on Recreation is also not supported by the evidence. (DEIR, pp. 165-166.) The Community Garden provides unique

recreational resources to the City of Daly City. The Community Garden on site is the only community garden in Daly City. (Exhibit [Petition].) According to the Community Garden Alliance:

> Community gardens function as ecological green space, a gathering place for neighbors, as well as a place for solitude, reflection and study. They also make a positive contribution to the community by reducing food insecurity, providing access to culturally relevant foods, promoting healthier eating through education programs, and providing access to gardening for those who otherwise could not have a garden, such as families with young children, the elderly, recent immigrants, multifamily dwellers, and or the homeless. (Ibid.)

The record is full of letters and comments from citizens espousing the unique recreational value of the Community Garden and imploring the City not to destroy such a valued resource. (See e.g. Sept. 3, 2023 Email to Michael Van Lonkhuysen from Andrew Sielen.) A recent Petition to save the Community Garden garnered more than 4,000 signatures because of the unique, important recreational value the Community Garden provides. (Exhibit [Petition].)

The DEIR suggests that it will mitigate the loss of the Community Garden with a small set of raised planter beds off site. (See DEIR p. 10 ["JUHSD is providing raised planter beds at their new adult education building located at 123 Edgemont Drive…"].) The DEIR does not discuss this alternative in any additional detail, except to show approximately six raised garden beds in an extremely small space off site. (Id. Fig. 2.2-6.)

The proposed off site garden beds will not provide the public with the same resources nor recreational opportunities as the existing Community Garden, and are insufficient mitigation for the destruction of such an important resource. (Compare DEIR, Figure 2.2-6 with Photos of Garden, available at https://spaces.hightail.com/space/Rnj8vgpFV0/files#pageThumbnail-1.) The raised beds are not located adjacent to greenspace, will not provide habitat for sensitive species, will not permit community gardeners to cultivate plants, will not provide sufficient space for indigenous religious ceremony, and will not provide the same recreational opportunity as the existing space. Please update the DEIR to reflect that the removal of the Community Garden will have significant impacts to recreation, and provide mitigation and/or an alternative which preserves the Community Garden.

> **Response CC.13:** Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation above.

Comment CC.14: V. The DEIR Fails to Analyze Relevant Land Use Plans, Policies, and Regulations, and Therefore, Its Conclusion that the Project Will Not Have Significant Land Use Impacts is Not Supported by the Evidence.

The DEIR concludes that the Project will have less than significant impacts on relevant land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental

effect. (DEIR, p. 123.) Yet, in its analysis, it incorrectly asserts that the Project complies with the City's Inclusionary Housing Ordinance and ignores relevant land use policies. (See DEIR.)

The Project does not comply with the Inclusionary Housing Ordinance, which, as explained in the DEIR, mitigates negative effects on the environment. (DEIR, p. 124.) In Project proposals, the City has indicated that affordable housing units will be separated from the rest of the Project. (See November 15, 2021 Memorandum to the Mayor, Affordable Housing Committee, and Councilmember Glenn Sylvester.) Though the Precise Plan asserts that affordable housing will be "mixed throughout the site," it indicates that an "affordable housing development is planned… at the southeast corner of the Plan Area." (DEIR Appendix B, p. 14.) The Project website shows "workforce housing" segregated onto Parcel C. (Jefferson Union High School District, The Serramonte Del Rey Neighborhood, available at https://serramontedelrey.org/masterplan/.) If the Project, in fact, will segregate all or the majority of low income housing onto specific parcels, away from the rest of the Project, this should be explicitly noted in the DEIR. (See Discussion of CEQA Requirements for an Accurate Description of the Project, above.)

If the Project in fact segregates such housing, the Project will fail to comply with the Inclusionary Housing Ordinance. The Inclusionary Housing Ordinance was enacted to "provide for integration of low- and moderate-income households with households in market-rate neighborhoods." (Daly City Municipal Code ["DCMC"] § 17.47.010(c).) The Ordinance mandates: "[M]ultifamily Inclusionary Units shall be located so as not to create a geographic concentration of Inclusionary Units within the Residential Development." (DCMC § 17.47.100 (A).) Such a conflict constitutes a significant land use impact. Please update the DEIR to reflect and mitigate this impact by dispersing the low-income housing throughout the Project, and/or fashion a project alternative that would do so.

Response CC.14: Please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above. The location of affordable housing within the project in no way implicates an environmental impact, beyond those impacts already disclosed in the DEIR related to the construction and occupancy of the units planned for the site. Nothing provided in the comment supports the claim that the specific location of affordable units within the site (i.e. dispersal among several buildings or concentration within one or more buildings) would translate to a change in the nature or severity of any particular environmental impacts, such as to biological resources, noise, air pollution, water demand, energy use, vehicle trips, etc., beyond what is disclosed in the Draft EIR. An affordable unit, whether located on any particular portion of the site (e.g. Parcel B-F), would result in the same impacts as disclosed in the Draft EIR.

Comment CC.15: As the Project would segregate low-income housing from market-rate housing, it would also impermissibly discriminate against Black, Latino, and Indigenous residents. (See accord NAACP's June 10, 2022 and October 6, 2022 Letters to Daly City Mayor, available at https://www.communitygardenalliance.org/naacp-letters.) Empirical evidence demonstrates that Black, Latino, and Indigenous families have lower income, less wealth, and are more likely to be

extremely low-income, and thus are more likely to utilize affordable housing. Black, Latino, and Indigenous households "are more likely than white households to be extremely low-income renters." (Exhibit E, National Low Income Housing Coalition, Racial Disparities Among Extremely Low Income Renters (Apr. 2019).) Because of decades of racist policies and practices, "[f]or every $1 that white families earn, Black families earn $0.60 and Latino families earn $0.52." (Exhibit F, Public Policy Institute of California Fact Sheet, Income Inequality in California (March 2023); see also Exhibit E, National Low Income Housing Coalition, Racial Disparities Among Extremely Low Income Renters (Apr. 2019.) The data also demonstrates that Black and Latino families have significantly less wealth than white families. According to the U.S. Department of the Treasury, "the median white family had $184,000 in wealth in 2019 compared to just $38,000 and $23,000 for the median Hispanic and Black families, respectively." (See Exhibit G, U.S. Department of the Treasury, Racial Differences in Economic Security: The Racial Wealth Gap (Sept. 2022); see also Exhibit H, de Costa, Pedro, Economic Policy Institute, Housing Discrimination Underpins The Staggering Wealth Gap Between Blacks and Whites (Apr. 2019).) As Black, Latino, and Indigenous people are more likely to utilize affordable housing, and the Project, as proposed, would segregate affordable housing from market rate housing, the Project would, therefore, segregate Black, Latino, and Indigenous residents in the Serramonte Del Rey Development.

Approval of the Project thus would enable the Project to discriminate on the basis of race and ethnic background, and violates General Plan Policy HE-16, which provides that the City must "[p]revent housing discrimination based on age, race, religion, sex, ethnic background, or familial status, and work..."

Likewise, if the City approves the Project, it would fail to comply with General Plan Task HE-16.1. General Plan Task HE-16.1 mandates: "[t]he City shall assist in the implementation and enforcement of State and federal fair housing and civil rights laws." State Civil Rights laws, including the Unruh Civil Rights Act and Fair Employment and Housing Act ("FEHA") prohibit discrimination on the basis of race, color, or ancestry in housing. (See Cal. Civil Code § 51; Gov. Code §§ 12900 et seq.) This would also contravene the City's obligation to affirmatively further fair housing, and the prohibition on discrimination in any program or activity funded by the state of California. (See Gov. Code §§ 65584(e), 11135.)6 If the City were to approve the Project, it would permit the violation of the Unruh Civil Rights Act and FEHA and would contravene Government Code sections 11135 and 65584. The City, therefore, would thus fail to comply with General Plan Task HE-16.1.

Response CC.15: Economic and socioeconomic topics are not considered CEQA issues unless they are a result of environmental impacts caused by a project. The commentor specifically references General Plan Policy HE-16 and the associated General Plan Task HE-16.1. General Plan Policy HE-16 is a housing element policy directing the City to prevent housing discrimination in accordance with State law and does not constitute a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, it does not need to be analyzed under the Draft EIR. Furthermore, as discussed above in Response CC.14 and in Master Response 3: Inclusionary Housing Ordinance and

State Affordable Housing Law, the specific location of affordable units within the project would not translate to any change in the nature or severity of the project's environmental impacts, therefore, the Draft EIR does not include discussion of economic or social impacts. For discussion of the Project's compliance with State law, please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law. A footnote in commentor's letter cites several studies regarding the environmental impacts that may result from the siting of housing in certain areas. To the extent the commenter suggests that future project users will be exposed to significant impacts, CEQA statutes and cases are clear that impacts on future project users are not properly subject to CEQA review in these circumstances. Nevertheless, for informational purposes, the Draft EIR fully analyzed health risks, including impacts on future project users, and determined impacts would be less-than-significant after mitigation. Specifically, the Draft EIR demonstrates that future project users will not be exposed to significant environmental impacts, and that ambient health risks are orders of magnitude below the local air district's risk thresholds. For instance, surrounding pollution sources are estimated to have $PM_{2.5}$ concentrations of 0.04 $\mu g/m^3$ (compared to a threshold of 0.8 $\mu g/m^3$); a hazard index of <0.04 (compared to a threshold of 10.0); and a cancer risk of 10.64 per million (compared to a threshold of 100 per million). (Draft EIR, page 51). To the extent Parcel C may have a greater share of affordable units, it is important to note that Parcel C sits farther from the nearest highway and gas station, which are located to the north of the project site and nearest to Parcel B's market-rate units (which, like the remainder of future project users, have been studied and shown not to experience any substantial exposure above local air district thresholds). Commentor has not demonstrated any environmental impact of the project that has not already been addressed and analyzed in Chapters 3.3 and 3.8 discussing Air Quality and Greenhouse Gas Emissions respectively.

Comment CC.16: The Project also does not comply with Daly City General Plan Policy LU-18, which provides:

Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.

Despite this Policy, as discussed herein, the Project will significantly disrupt the natural environment – it will destroy the Community Garden, as well as essential urban habitat for sensitive species, resulting in significant environmental effects. (DEIR, p. 10.) The Project also fails to take all reasonable measures to prevent such effects. The Project, therefore, would have significant land use impacts.

The DEIR, however, does not recognize these inconsistencies with the City's Ordinance, City General Plan, and state law as significant impacts. The DEIR's finding that the Project would not result in

significant land use impacts, therefore, is not supported by substantial evidence. What's more, because the DEIR fails to recognize such impacts, it fails to provide legally-required mitigation measures or alternatives to mitigate such impacts.

As such, in order to comply with CEQA, please update the DEIR to analyze the land use inconsistencies discussed above, provide mitigation for these inconsistencies including dispersing affordable housing throughout the Project, and update the DEIR's alternatives analysis to account for these significant impacts.

> **Response CC.16:** As discussed throughout the Draft EIR and in Response CC.1: through Response CC.15:, the project would comply with General Plan Policy LU-18 because the project would not result in any significant, unavoidable impacts to the natural or urban environment and all necessary mitigations have been identified to reduce impacts to less than significant levels. Please also refer to Master Response 1: Demonstration Garden.

Comment CC.17: VI. The DEIR Alternatives Analysis Does Not Sufficiently Examine Nor Adopt Alternatives That Would Mitigate Project Impacts.

The CEQA alternatives analysis has been described by the California Supreme Court as the "core of an EIR." (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 564.) An EIR must include a sufficient range of alternatives to permit a reasoned choice between alternatives and foster public participation. (Cal. Code Regs., tit. 14, § 15126.6(f); Bay Area Citizens v. Association of Bay Area Gov'ts (2016) 248 Cal. 4th 477.) CEQA provides a "substantive mandate that public agencies refrain from approving projects for which there are feasible alternatives or mitigation measures" that can lessen the environmental impact of proposed projects. (Mountain Lion Foundation v. Fish & Game Com. (1997) 16 Cal.4th 105, 134, citing Pub. Resources Code § 21081 [emphasis added].) "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 404 ["Laurel Heights"]; Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1350.)

A lead agency's ability to comply with this mandate is predicated on a clear analysis of correct findings of a project's impacts and a feasible set of project objectives. An EIR's review of project alternatives must analyze alternatives "which are capable of avoiding or substantially lessening any significant effects of the project." (Cal. Code Regs., tit. 14, § 15126.6(b).) It's very purpose is to identify ways to reduce or avoid significant environmental impacts. (Laurel Heights, supra, 47 Cal.3d at 403.) In order to achieve this purpose, the EIR must correctly identify project impacts.

Yet the Project alternatives analysis, as drafted, does not adequately assess whether alternatives would avoid or substantially lessen significant Project effects, because the DEIR incorrectly identifies a number of impacts – including impacts to biological resources, recreation, and land use

– as less than significant. The DEIR's alternatives analysis, therefore, does not sufficiently examine whether the alternatives listed would mitigate or avoid such impacts. (See DEIR, pp. 209.)

For this reason, the DEIR does not consider alternatives that would mitigate substantial land use, recreation, and biological resources impacts. (DEIR, pp. 211-215.) Sierra Club and the Daly City Community Garden Alliance have repeatedly requested that the City require the Developer to mass the buildings closer to Serramonte Boulevard; convert the Community Garden into a public park, in order to preserve it; continue to permit public use of the Community Garden; and disperse affordable housing throughout the Project. (See Sierra Club September 8, 2021 Daly City City Council Letter, available at https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u18061/Daly%20City%20Council%20Letter%20on%20SDR%20GPU%20and%20SDM%2091321_9.8.21.pdf ; Sierra Club Board of Supervisors August 13, 2021 Letter, available at https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/loma-prieta chapter/conserveletters/Letter%20to%20David%20Canepa%208.13.21.pdf.) An alternative that does so would avoid significant land use biological resources and recreation impacts, and would conform with the Inclusionary Housing Ordinance, the General Plan, and relevant civil rights laws. Yet the DEIR does not identify any such alternative nor make any effort to mitigate significant land use and biological resources impacts related to the segregation of affordable housing or the destruction of the Community Garden, wetland, and greenspace. (DEIR, pp. 211-215.)

Though CEQA "compels government… to mitigate… adverse effects through the imposition of feasible mitigation measures or through the selection of feasible alternatives," the DEIR does not select a feasible alternative which would mitigate the significant biological resources, recreation, and land use impacts discussed in this correspondence. (Sierra Club v. State Board of Forestry (1994) 7 Cal.4th 1215, 1233, see also Pub. Resources Code § 21002.)

Adoption of the DEIR without substantive changes to the Alternatives analysis would violate CEQA. Please update the DEIR to both articulate and select an alternative that would preserve the Community Garden and surrounding greenspace, and disperse affordable housing throughout the Project, as articulated herein.

> **Response CC.17:** Please refer to Master Response 8: Alternatives above. Please also refer to Response F.12. Please also refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law.

Comment CC.18: VII. Conclusion

For the foregoing reasons, Daly City will violate CEQA if they adopt the DEIR and the Project without substantial changes. Please update the Project and the DEIR to adequately address the issues raised in these comments, then recirculate a revised DEIR with the information and analysis requested herein.

Pursuant to Section 21092.2 of the Public Resources Code and Section 65092 of the Government Code, please notify Sierra Club of all CEQA actions and notices of any public hearings concerning this Project, including any action taken pursuant to California Planning and Zoning Laws. In addition, pursuant to Public Resources Code section 21167(f), please provide a copy of each Notice of Determination issued by the City or any other public entity in connection with this Project, and add Sierra Club to the list of interested parties in connection with this Project. Please send all notices by email to Gladwyn d'Souza at godsouza@mac.com and Sabrina Brennan at sabrina@dfm.com. If email is unavailable, by U.S. Mail to Sabrina Brennan, 165 La Grande Avenue, Moss Beach, California 94038.

Thank you for your careful attention to these important matters.

Response CC.18: Please refer to the responses regarding the commenter's concerns above. Based on these responses, the Draft EIR does not require recirculation.

DD. Althouse and Meade, Inc. (dated September 7, 2023)

Comment DD.1: Per your request the Biological Resources section of the Draft Environmental Impact Report (DEIR) was reviewed by Althouse and Meade, Inc. (A&M) Principal Biologist David Magney and Senior Biologist Darcee Guttilla.

David Magney is a California Certified Consulting Botanist (#0001), ISA Certified Arborist (#WE-4746), approved biological consultant for Santa Barbara, Ventura, Los Angeles, and San Luis Obispo Counties, and has served as an Expert Witness for the U.S. Department of Justice on an EPA wetlands violation case in Santa Barbara County. He has extensive knowledge and experience with the biological resources of California and the Bay Area. Mr. Magney also serves as the Rare Plant Program Manager for the California Native Plant Society (CNPS). He is also researching the flora of Ventura County and has authored several publications on biological resources. Mr. Magney is the chair of the California Board of Certification, serving in that capacity since its inception in 2015. His resume is attached to establish his expertise and experience in biological resource issues.

Darcee Guttilla is a Certified Wildlife Biologist® with 28 years of experience as a field biologist in California. Ms. Guttilla possesses the expertise and qualifications to expertly evaluate the quality and completeness of biological resource assessment reports. She holds a M.S. in Biology from California State University, Fullerton and a B.S. in Zoology from the University of California, Santa Barbara, demonstrating her strong educational foundation in the biological sciences. Ms. Guttilla's experience includes obtaining recovery permits from USFWS to conduct activities with federally threatened and endangered species such as the California tiger salamander and California red-legged frog. She has worked as an authorized biologist on multiple projects involving these protected species across several California counties. Ms. Guttilla has demonstrated application of ecological principles for the sound management of rare and sensitive species and habitats. With her extensive experience conducting field surveys of various taxa, managing habitats, and implementing protocols to avoid and minimize impacts to sensitive species, Ms. Guttilla has the expertise to

evaluate the thoroughness and scientific rigor of biological assessments to ensure complete disclosure of potential project impacts and effectiveness of proposed mitigation measures. Ms. Guttilla's combination of educational background, regulatory experience, and applied skills make her exceptionally qualified to review and critique biological resource reports.

A&M generally finds the assessment of biological resources inadequate in fully characterizing the conditions of the biological resources of the project site and failing to property identify sensitive resources that should either be avoided or mitigated to a less-than-significant level. Details of our review are provided below.

Policy LU-18 Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.

> **Response DD.1:** This is an introductory comment that summarizes the comment letters main concerns. Please refer to the responses below regarding specific issues raised by comment letter.

Comment DD.2: DEIR Page 59, Sensitive Natural Communities, states that there are "No riparian, native grassland, valley oak woodland, or other sensitive natural communities are present withing the project site" but claims that the "Demonstration Garden" is of planted species therefore does not qualify as a sensitive natural community. However, it is stated that there are "two separate stands of native arroyo willow" onsite. The DEIR claims that the site has been significantly disturbed in the past and that the biologists did not find a natural stream that these Arroyo Willow thickets to not meet the definition of a sensitive natural community.

(see Appendix A for Photo 1. Blue Butterfly from the community garden site).

This conclusion as at least two flaws in logic. First, because the project biologists did not find a natural water source does not mean that one is not present. If fact, natural seepage is documented by the Daly City Community Garden Alliance as present, with standing and flowing water from the adjacent slopes to the west that ponds onsite as a result of a clogged drainage system.
The fact that Arroyo Willow thickets have become established onsite clearly indicates that surface and shallow groundwater is present in sufficient quantities to support hydrophytic plants. Furthermore, the presence of an unmaintained drainage system is also evidence of a need to convey surface water, presumably at least in part from the seeps found onsite.
Second, all wetland habitats, including willow wetlands, in California are considered sensitive habitats because they have been reduced in area by over 90% and because they provide habitat for a wide variety of native species of wildlife.

> **Response DD.2:** The comment relies on documentation provided by the Community Garden Alliance to make the statement that natural seepage is present. The photos and videos provided by the Community Garden Alliance were taken during the wet

season during a wetter than normal period of time. During the 14 days prior to the date the photographs and videos were taken (January 9, 2023), 11.2 inches of rain occurred, and on January 9, 1.2 inches of rain occurred (Deters 2023). The presence of standing or flowing water in and of itself is not necessarily indicative of the presence of aquatic features, particularly during a wetter than normal period of time during the wet season.

While arroyo willow (*Salix lasiolepis*) often does occur in wetlands, it is a phreatophyte (has a deep taproot) and as such is able to access ground water below the depth necessary to meet wetland criteria. Arroyo willows frequently occur in upland positions in the San Francisco Bay Area, and the presence of arroyo willow in and of itself does not indicate wetland conditions. For example, at the mapped arroyo willow thicket closest to the demonstration garden, the understory is dominated by ivy (*Hedera sp.*) and upright veldt grass (*Ehrharta erecta*), both of which are indicative of upland conditions. The presence of an understory dominated by perennial upland species indicates that the arroyo willow is not behaving as a hydrophyte.

As described in the Draft EIR, the meadow is a man-induced feature, resulting from deferred maintenance of the project site's drainage system. The comment makes the presumption that the hillside seepage is natural in origin but does not provide a scientific basis to support that presumption. Documentation provided in support of the Draft EIR provides substantial evidence demonstrating that the presence of water on the hillside is present entirely as a result of human-induced modifications to the landscape (see Appendix E of the Draft EIR). The value of this wetted area is entirely linked to human activity, i.e., the drainage system could be more frequently maintained at any time, causing the hydrologic conditions to support a wetland to cease to exist. The fact that the existence of this feature is dependent on human action and that JUHSD could decide to more frequently maintain the drainage system at any time were factors leading to the determination in the Draft EIR that the meadow is not a sensitive natural community.

The comment's claim that all wetland habitat in California should be considered sensitive natural communities is misleading. Sensitive habitat is based on regulations and jurisdiction, with each jurisdiction having different criteria for what is considered sensitive habitat, and it is not the case that all arroyo willow thickets in the state are treated as sensitive, regardless of the circumstances. As discussed above and in Master Response 5: Wetlands, the Draft EIR concluded that the meadow does not appear to qualify as a jurisdictional wetland and, therefore, would not be considered sensitive habitat under CEQA.

Comment DD.3: Special Status Plants

Seasonally timed botanical surveys are found to be insufficient with site visitations occurring only in January, April, and June 2021. The bloom period for perennial herb, Water Star Grass (Heteranthera dubia) is July-August. This species is found in wetland and riparian communities, which are known to occur onsite.

There is also no mention of visitation to botanical reference sites for sensitive plant species listed in CNDDB and CNPS rare plant inventory to determine if they would be in bloom during January, April, and June site visits to proposed project site. These are important resources that the project biologist needs to examine to determine which special-status species have potential to occur on the project site.

(See Appendix A for Table 1. Vascular Plants Identified From Community Garden Photographs (1/9/23))

A thorough floristic survey needs to be conducted of the project site, indicating which plants were planted versus naturally occurring, not just assuming all plants were planted.

Response DD.3: It is standard practice and consistent with California Department of Fish and Wildlife (CDFW) botanical survey guidelines to first evaluate a site and determine whether it has the potential to support special-status plant species. If it is determined that a site does have the potential to support special-status plant species, then floristic surveys are appropriate, including visits to reference sites. If it is determined that a site is unlikely or has no potential to support special-status plant species, floristic surveys are not required, and visits to reference sites are not needed.

Based on numerous site visits conducted by two biological consulting firms, the project site does not have the potential to support special-status plant species, and therefore floristic surveys were not necessary. The site has a long history of significant land disturbance and is surrounded urban development, which were factors used as a basis for the Draft EIR concluding that the project site does not contain any special-status plant species.

The comment states that water star grass (*Heteranthera dubia*) has the potential to occur at the Project site because suitable habitat is present. However, water star grass, which was last documented in the San Francisco Bay Area in 1879, occurs in alkaline, still, slow-moving, usually slightly eutrophic waters in marsh and swamp habitat, and such habitat is absent from the project site. The wetted area on-site is a small, isolated, shallow, seasonally inundated depression that is dominated by annual herbs and that formed incidentally due to deferred infrastructure maintenance in a highly altered landscape. It is not suitable habitat for this species.

Comment DD.4: Wetland Habitats

Wetland habitats are documented as present onsite. While the recent Supreme Court decision about Clean Water Act jurisdiction may have eliminated U.S. Army Corps of Engineers (Corps) jurisdiction on the wetlands onsite, wetland habitat is still present and represents a sensitive habitat that provides numerous functions (Brinson 1993, Brinson et al. 1995) and would be considered significant. These functions can be measured by using a Hydrogeomorphic Assessment Methods (HGM) model that allows for an objective and holistic approach to measuring wetland functionality (Hruby 1999). A regional HGM model for riverine wetlands was developed for the California central coast (Lee et al. 1996) and could be applicable here.

Impacts to wetland habitats need to either be avoided or fully mitigated. A permit from the California Department of Fish and Wildlife (CDFW) pursuant to Section 1600 et seq. will be required for any alteration of the wetland habitats onsite.

Response DD.4: No HGM Regional Guidebook has been developed for the region in which the project site occurs (i.e. the site is not located within the California Central Coast region for which the suggested HGM model was developed, and therefore inapplicable to the site). Regardless, the wetted area has low value for the reasons stated above in Response DD.2: above, and impacts to it are less than significant. The value of this wetted area is entirely linked to human activity, i.e., the drainage system could return to more frequent maintenance at any time, causing the wetland to cease to exist. The fact that the existence of this feature is dependent on human action and that JUHSD could decide to more frequently maintain the drainage system at any time were factors leading to the determination in the Draft EIR that the loss of the meadow is a less than significant impact. A less than significant impact does not require mitigation under CEQA. In addition, California Fish and Game Code Section 1600, et seq. requires a permit from CDFW only when a project would "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake." There are no water ways like rivers, streams, or lakes present on the site that would trigger CDFW jurisdiction. Please also refer to Master Response 5: Wetlands above.

Comment DD.5: Special-status Wildlife

The DEIR on Page 62 states that no special-status wildlife species were observed onsite. It further states that the Western Bumble Bee (Bombus occidentalis occidentalis) has no protection status; however, the California Fish and Game Commission elevated its status, and the status of three other bumble bee species to be candidates as Endangered under the California Endangered Species Act since 2019. Suitable habitat for Western Bumble Bee does occur onsite (shrublands, chaparral, gardens, and urban parks) and is known from northern Mexico to central British Columbia. The DEIR's statement that "range of the western bumble bee, which is not a protected species under federal or state law but is being closely monitored due to declines in numbers and distribution over the past two decades, does not encompass the project site" is inaccurate. Suitable habitat for the

Western Bumble Bee is indeed present. For example, A&M biologists just found Crotch Bumble Bee (Bombus crotchii), a species also given candidate status under the California Endangered Species Act, on a site in the upper Salinas River Valley that no one considered suitable for it. Field surveys need to be conducted specifically for bumble bees to determine if they are present or not.

Response DD.5: The fact the commentor observed another type of bee on a different site in another part of the state is not at all indicative of the potential for the western bumble bee to be present on the subject site. Historically, western bumble bee (*Bombus occidentalis*) was distributed broadly throughout the western United States (Hatfield et al. 2015). In California, western bumble bee is thought to be largely extirpated from low elevation sites and is restricted to the Northern Coast and Sierra Nevada Ranges (Hatfield et al. 2015, Bumble Bee Watch 2023). This species has not been encountered during recent bumble bee surveys conducted along the California coast (Bumble Bee Watch 2023). For these reasons, western bumble bee is unlikely to be present at the project site and does not need to be surveyed for.

Comment DD.6: Mission Blue Butterfly is known from approximately 1 mile from the project site as reported in the CNDDB. Daly City Community Garden Alliance members have reported seeing hundreds of Mission Blue Butterfly individuals onsite and its host plant, Lupinus albifrons, occurs onsite. Protocol level surveys for the Mission Blue Butterfly should be conducted before any conclusive statements can be made about its potential presence onsite and how impacts to it can be avoided.

Response DD.6: The Mission blue butterfly (*Icaria icarioides missionensis*) persists in small populations in San Francisco, San Mateo and Marin Counties. The majority of the remaining Mission blue butterflies are found on San Bruno Mountain in San Mateo County, located in close proximity to the project site. This species inhabits coastal chaparral and coastal grasslands in the fog belt of the coastal range from 690 to 1,180 feet elevation. Three species of lupine serve as larval food plants: silver lupine (*Lupinus albifrons*), summer lupine (*L. formosus*), and many colored lupine (*L. littoralis var. variicolor*). Adults feed on hairy false golden aster (*Heterotheca villosa*), blue dicks (*Dipterostemon capitatus*), and seaside buckwheat (*Eriogonum latifolium*) (Black and Vaughan 2005).

The comment states that Community Garden Alliance members have reported seeing “hundreds” of Mission blue butterflies on the project site. The Community Garden Alliance includes photographs and videos of a blue butterfly (Family Lycaenidae) taken on January 9, 2023 (Community Garden Alliance 2023). The photos and videos were analyzed by WRA. The dots on the ventral side of the wing of Mission blue butterflies are circular, with a white ring or halo around them. In contrast, the dots on the ventral side of the wings of the butterfly in the Community Garden Alliance video are irregular dashes with no ring. Based on this video, the

blue butterflies observed by Community Garden Alliance members are Pacific azures (*Celastrina echo*), and not Mission blue butterflies. Pacific azures are common butterflies that are widely distributed throughout the San Francisco Bay Area and utilize numerous host plants. Therefore, the photographs submitted by the Daly City Community Garden Alliance do not provide evidence that Mission blue butterflies occur within the project site.

The comment asserts that a Mission blue butterfly occurrence is documented in the California Natural Diversity Database approximately 1 mile from the project site, but WRA was unable to locate an occurrence record within 1 mile of the project site. The nearest documented occurrence in the CNDDB is approximately 1.8 miles south of the project site, at Milagra Ridge. Mission blue butterfly is also known from San Bruno Mountain, approximately 2 miles east of the project site. However, most Mission blue butterflies only travel short distances (up to 1.2 miles) around known population centers. Adult butterflies would have to cross miles of urban development to reach the Project site from the closest known population area, which is unlikely to occur.

The comment also reports that the host plant of the Mission blue butterfly, silver bush lupine, occurs within the project site. Several Community Garden Alliance photos depict lupines occurring around the Project site, including a shrub lupine species and several annual and/or perennial herbaceous species. WRA revisited the project site on September 26 and October 5, 2023. All shrub lupine species observed, including those in the Community Garden Alliance photos, are coastal bush lupine (*Lupinus arboreus*). A small grouping of a few herbaceous lupines was observed within the garden, and no herbaceous lupines were observed outside of the garden. Because of late-season phenology, the herbaceous lupine could not be identified to species, but based on the combination of observable vegetative characteristics (such as an erect habit, leaflets that are glabrous adaxially and sparsely hairy abaxially, petioles greater than 12 inches long, overall plant height of 40 inches) it can conclusively be determined that the lupine present is not any of the Mission blue butterfly host plant species. Some of the herbaceous lupines in the Community Garden alliance photos could not be located, but it is assumed that these were annual species, because the perennial lupine species that are known from San Mateo County would retain their foliage and still be evident at the time of the site visit. No annual lupines are host plants for the Mission blue butterfly. Therefore, although lupines are present within the project site, none are suitable host plants for Mission blue butterfly. Further, in the event a few host plants were found in the demonstration garden, the low number of host plants coupled with being surrounded by urban development would not be enough to sustain a Mission blue butterfly population. Thus, the demonstration garden would not be considered critical habitat for a special-status species.

After reviewing background materials and conducting a site visit, the photographs and video taken by the Community Garden Alliance do not provide evidence of Mission blue butterfly occurring within the project site. Furthermore, based on dispersal barriers and the lack of host plant species, Mission blue butterfly is unlikely to occur within the project site.

Comment DD.7: California red-legged frog (Rana draytonii; CRLF) has a 2019 CNDDB record within two miles of proposed project site. U.S. Fish and Wildlife Service Revised Guidance on Site Assessment and Field Surveys for the California red-legged frog (2005) does not require a site assessment if not within 1-mile of known location; however, the proposed project site is within the current range of California red-legged frog (https://www.fws.gov/species/california-red-legged-frog-rana- draytonii), within the Colma Creek watershed (https://www.flowstobay.org/data-resources/maps/watershed-map/), and less than one mile to from Colma Creek (which runs parallel with State Highway 82). This should warrant, at minimum, targeted nocturnal eyeshine surveys when water is present and nocturnal eyeshine surveys during rain events when CRLF move over upland habitat. The above USFWS guidance (2005 file:///C:/Users/darceeg/Downloads/CRF- Survey-Guidance%20Aug2005_FINAL%20(1).pdf) also provides optimal periods for detection of all life stages of CRLF.

Response DD.7: There is no potential breeding habitat on the site for California red legged frog, there are no suitable breeding ponds in proximity to the project site, and there are no suitable aquatic movement corridors between areas containing suitable breeding habitat and the project site. The project site is within the Colma Creek watershed, but it is surrounded by major roads and located greater than 1 mile west of Colma Creek. The land between the project site and Colma Creek is completely developed, with development types including residential, commercial, industrial, cemeteries, and the Interstate 280 freeway. The remainder of the site is surrounded by dense urban development. These barriers preclude dispersal by California red-legged frog (*Rana draytonii*) into the project site. As such, there is no potential for California red-legged frog to occur in the project site, and surveys for this species are not necessary.

Comment DD.8: A species list provided by community garden volunteers identified numerous species of wildlife.

Response DD.8: The species list by the community includes five special-status or potentially special-status species: Mission blue butterfly, Monarch butterfly (*Danaus plexippus* pop. 1), gartersnake (*Thamnophis sp.*), bald eagle (*Haliaeetus leucocephalus*), and mountain lion (*Puma concolor*).

Mission Blue Butterfly: Please refer to Response DD.6: above.

Monarch Butterfly: The monarch butterfly is found throughout the United States, southern Canada, and Central America. It also occurs in parts of South America and other continents. In North America, this species spends spring and summer months breeding and foraging across much of its range. The monarch butterfly generally uses milkweed (*Asclepias spp.*) for both breeding and nectaring, although nectar may also be obtained from a variety of additional plant species. From August to October, adult monarchs west of the Rocky Mountains will migrate to winter roost sites located along the California coast. At roost sites, monarchs will congregate in thousands or millions on a tree or group of trees. Western monarchs prefer overwintering habitat comprised of a relatively dense grove of trees with some understory, located near water and nectar sources and protected from the wind by topographic landforms or trees. Winter roost sites are often on south, southwest, or west facing slopes which may provide more favorable temperature regimes and wind protection. Monarch butterflies typically arrive in mid-October to overwintering sites along the California coast and remain until late February or March.

The project site is located approximately one mile from the coast, in the monarch overwintering zone. No monarch overwintering sites have been recorded at or in the vicinity of the Project site. Due to the highly urban nature of the site, it is unlikely that clusters of overwintering monarchs would have been overlooked. The Project site contains north-, east- and west-facing sloped hillsides dominated by Monterey pine (*Pinus radiata*), on the northern, eastern, and western borders. The canopy ranges from open to moderately dense. The understory contains areas dominated by annual grasses, as well as moderate to dense shrub cover.

In California, monarchs have been documented using Monterey pine stands as overwintering sites. Potential nectar plants for overwintering monarchs, such as coyote brush (*Baccharis pilularis*), were observed in the understory of the Monterey pines at the project site. Therefore, while the project site does not host a monarch overwintering site, it is possible that migrating monarchs may utilize the site as a transitory roost site while traveling to established overwintering sites to the north or south. However, the project site does not provide a unique value to monarchs as they could use the area similarly to the way they could use landscaped areas in any nearby neighborhood or park. Monarch butterfly presence is incidental at the project site and the project site does not provide habitat that significantly supports biological functions of the species.

Gartersnake: San Francisco gartersnake has no potential to occur at the project site. It is associated with perennially inundated areas such as ponds, and such habitat is absent from the project site. The wetted area in the project site is a small, shallow, isolated, seasonally inundated depression and does not provide suitable habitat for this species. San Francisco gartersnake can sometimes travel along waterways such

as streams, but the nearest stream is greater than one mile east of the project site. No other special-status gartersnake species have potential to occur at the project site.

Bald Eagle: Bald eagles require large areas of open space for foraging and are commonly associated with open bodies of water such as lakes and rivers. Such habitats are absent from the project site and vicinity.

Mountain Lion: The wooded areas along the western and eastern boundaries of the project site have limited value as a low-quality pass-through corridor for mountain lions, and these areas will be retained by the project. These corridors do not provide sustained habitat for mountain lion, and they do not provide high value connectivity for mountain lions because they do not facilitate movement between larger areas of open space. The corridors would facilitate movement between and through urbanized areas, which cause potential for human-lion interactions that are not favorable to the sustainability of mountain lion populations.

Comment DD.9: This is followed by a list of native terrestrial mollusks (snails and slugs) that are known to occur form San Mateo County, some of which could occur onsite. Some of these are endemic to the region and quite rare, and should be surveyed for and assessed for project-related impacts.

Response DD.9: None of the terrestrial mollusk species listed in Table 3 of the comment letter are special-status, as indicated in the table. Surveys for non-special-status species are not required under CEQA, as the removal of habitat for those species would not constitute a significant impact.

Comment DD.10: Table 2 is an example of what should have been provided in Environmental Collaborative's report. Besides direct observations made during the seasonal field surveys, other sources of evidence should be accessed, such as from individuals using the project site and from records posted on Calflora and iNaturalist websites.

(see Appendix A for Table 2. Species List Reported From The Community Garden Volunteers Onsite (8/27/23) and Table 3. Terrestrial Snails Known from San Mateo County)

Response DD.10: The Biological Resources Report prepared for the Draft EIR (see Appendix D of the Draft EIR) includes a summary of special-status wildlife on page five and provides a table of special-status species found on the CNDDB database in Appendix B to the report. Calfora and iNaturalist databases provide similar information to the CNDDB database; however, the information supplied on those platforms comes from many individuals and requires additional verification of the contributors. The two expert biologists relied upon by the City in preparing the Draft EIR concluded that referencing these databases was not necessary for this project.

Comment DD.11: Nesting Birds

BRA page 6, paragraph 2 states, 'No evidence of any bird nesting was observed during the field reconnaissance surveys; however, nesting bird surveys are not described in methods section, yet page 15 of BRA Discussion 1) Less than Significant Impact with Mitigation Incorporated, states, 'There was no evidence of any bird nesting on the site during the field reconnaissance survey conducted in January 2021.' Yet in the same paragraph, the author references bird nesting season as February 1 to August 31. This suggests that the biologist did not perform seasonally appropriate nesting bird surveys. It should be clear that not noticing nesting activity is not equivalent to seasonally-timed multiple negative targeted nesting bird surveys. Nesting birds are often intentionally inconspicuous to avoid nest depredation, so it could very easily be the case that nests would not be encountered if targeted surveys were not performed.

Photos provided in the BRA and by Community Garden volunteers demonstrate this remnant parcel of green space supports a diverse array of nesting habitat with varied vegetation strata to support cavity-, ground-, shrub-, and canopy-nesting birds. The importance of this open space to native wildlife is critical even if habitat composition is not pristine native or sensitive habitat. Open spaces landlocked by urban sprawl are important to conserving native species.

BRA page 6 states, 'The intensity of human activity on the developed portion of the site limits the likelihood of any bird nesting, although there remains a remote potential for nests in the limited landscaping and existing structures. Although no evidence of active nests was observed during the field reconnaissance surveys, new nests of more bird species could be established in the future in advance of project construction. Preconstruction surveys are typically performed in advance of vegetation removal or building demolition where occupation by nesting birds is considered possible.'

These assumptions are flawed for the following reasons:

1) different bird species have varying tolerances to human activity;
2) birds are known to nest in human-occupied urban and suburban areas, on homes, porches and yards, and in active construction sites.
3) 14 days is too large of a time span for nesting preconstruction surveys as birds, namely house finches, can build a complete nest and lay an egg in one day.
4) Birds build nests on active construction sites so monitoring for nesting birds is necessary if construction overlaps with nesting season to dissuade or prevent nests from being built and if active nests are encountered, they must be properly buffered and protected until chicks successfully fledge.
5) A mechanism must be in place that contractors are held accountable for violations for Migratory Bird Treaty Act and Fish & Game Code violations. Include provisions for punishments for violations of these regulations.

DEIR Mitigation Measures page 65

Mitigation Measure Bio-1.1 is inadequate at protecting nesting birds and bats.

MM BIO-1.1 states,

- If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions.

Nesting birds are protected if they are nesting, which includes activities in selecting and building a nest. Some birds like hummingbirds and owls begin nesting in January, and some birds have double clutches or failed and renest attempts that extend nesting past the typical nesting season window. Neither of these scenarios would preclude protection of nesting birds. Therefore, any time birds are actively nesting, even during construction activities, the nesting birds shall be protected. The statement "without restrictions" should be struck out of measure.

The language in this mitigation measure does not adequately protect bats. In addition to text about birds, address that this measure could impact bats, refer to MM BIO-1.2 for more information.

- If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season.

As stated above, 14 days is too long of a lag time between survey date and construction initiation. If the contractor needs an advance window to mobilize for construction initiation, it is recommended to perform a minimum of nesting bird surveys every other day until construction is initiated.

- If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions.

The text "without restrictions" should be struck out of measure. As stated above, birds build nests in and around active construction sites. Replacement text should include "A full-time qualified biological monitor is recommended to ensure nesting birds are dissuaded or prevented from building nests in the active construction zone, and active nests that become established are protected. This includes nests built in remaining habitat that may be impacted by construction activities. A qualified biologist shall determine the appropriately sized nest buffer to protect birds based on nest location, visual barriers, and birds' tolerance to human and construction activity. The biologist has the authority to stop work if construction activities are believed to cause distress to nesting birds until an alternative can be found. Alternatives may include installation of visual blinds and/or reduced access to designated areas of the construction site until chicks fledge.

Response DD.11: The Draft EIR recognizes active nests are protected any time they are present and that nesting birds could be present on-site during the nesting season. Species that have the potential to occur at the project site are known to nest within the nesting bird season (February 1 to August 31). These windows have been established to encompass nesting events including double clutches and renest attempts. If nests are observed during surveys completed within the nesting season, mitigation measure MM BIO-1.1 would protect nests even if nesting continues beyond the end of the season. Surveys outside of the nesting bird season are not recommended because while birds can nest outside of that period of time, the possibility of impacts to nesting birds during this time period is negligible.

As the comment points out, the project site does not consist of "pristine native" or sensitive habitat; thus, the replacement of this habitat would not be considered significant. In addition, the project would provide additional open space and landscaping on-site that could be used by urban adapted birds for nesting.

A 14-day preconstruction survey window is the standard survey window used by the City of Daly City for projects in Daly City and provides sufficient time to avoid nesting birds during construction activities. Conducting surveys every other day has diminishing returns and would not significantly increase the likelihood of detecting a nesting bird compared to the 14 day window. In addition, 14 days was deemed appropriate by the two expert biologists relied upon by the City in preparing the Draft EIR. Further, a biological monitor is only needed in cases where sensitive habitats require oversight by that monitor. As discussed above in Response DD.2: through Response DD.9:, the project site does not contain any sensitive habitat for special-status species; thus, a biological monitor is not required.

Mitigation for avoiding impacts to bats is discussed below in Response DD.12:.

Comment DD.12: DEIR Mitigation Measure BIO 1.2 page 66
Adequate measures shall be taken to avoid roosting by special-status bat species because of tree removal and building demolition, specifically:

- 'To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e. generally avoiding tree removal or trimming April through October.'.

Additional text recommended: Prior to removal of any trees greater than 20-inches DBH, a qualified biologist shall inspect trees deemed for removal and surrounding trees for cavities and sloughing bark, guano and urine staining, conduct acoustic surveys (>10 days winter and > 3 days summer), and emergence surveys and prepare and submit a report of findings to CDFW and Daly City Natural Resources Manager. If bats are found in tree cavities, the biologist shall coordinate with CDFW preparation and implementation of a CDFW-approved bat exclusion plan that includes a sufficient

number of appropriately sized and placed supplemental bat housing/bat boxes to accommodate the number of displaced bats.

- 'Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e. generally avoiding demolition April through October).'

Alternate text recommended: Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e. generally avoiding demolition April through October). To avoid impacts to bats roosting in tight spaces, siding, crawl spaces, and attics of buildings, a qualified biologist shall conduct preconstruction bat emergence surveys and inspect entire building interior (including crawl spaces/ attics/chimney) and exterior for bat sign (e.g. guano, insect carapaces) prior to building demolition. The biologist shall prepare and submit a report of findings to CDFW and Daly City Natural Resources Manager. If bats are found in buildings, the biologist shall coordinate with CDFW preparation and implementation of a CDFW-approved bat exclusion plan that includes a sufficient number of appropriately sized and placed supplemental bat housing/bat boxes to accommodate the number of displaced bats.

- 'If tree removal, trimming, or building demolition occurs within bat maternity season (i.e. generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities.'

Comment: a more conservative survey window may be required to adequately perform all three preconstruction surveys trees/building inspection, emergence survey, and acoustic surveys. Caltrans has extensive bat mitigation measures that can be adapted for this project. (https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans- bat-mitigation-guide-a11y.pdf)

Response DD.12: The purpose of mitigation measure MM BIO-1.2 is to avoid potentially significant impacts to bats, including to active maternity roosts, which the current measure achieves. If determined necessary by the biologist, the pre-construction bat roost assessment will cover both buildings and potentially suitable trees scheduled for impact, i.e., demolition in and removal/trimming respectively. Potential bat roost substrates will be searched for and noted by the biologist. Potential roosts will be investigated directly by the biologist (e.g., using a bore camera, among other methods) to determine if bats and/or signs of bat occupation are present, and if so which species. If no potential roosts are found, then no additional measures or avoidance would be warranted. If determined necessary by the biologist, emergence surveys will be performed to determine roost occupancy; acoustic surveys may also be performed to support bat species identification if warranted. A report summarizing the methods and results of the habitat assessment

and roost survey (the latter if needed), and any associated recommendations, will be provided to the City for review.

CDFW would be contacted if needed, for example if disturbance to an active maternity roost or roost of special-status species is necessary to accommodate the project and avoidance otherwise within the context of MM BIO-1.2 is not feasible. Please refer to Section 5.0 Draft EIR Text Revisions for revisions to MM BIO-1.2 requiring CDFW contact.

Comment DD.13: DEIR Page 68 Impact BIO-4 The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Less than Significant Impact)

We counter that wildlife corridor function of open space/green belts in urban settings becomes significantly more important as natural habitats are reduced to disparate islands across the landscape. Keeping only mature trees on edge of property reduces cover for wildlife, making them vulnerable to predation, increased risk of collisions with vehicles, and pets. Increased infrastructure and resulting lighting and associated noise interferes with bat foraging activity and nocturnal wildlife. It reduces breeding and foraging habitat.

Response DD.13: The slopes on the western and eastern sides of the project site are the result of historical grading, and after grading, they were planted with Monterey pines. These areas have been unmaintained and have subsequently developed an understory of primarily weedy species. These forested slopes will be retained by the project, although a tree succession plan for aging mature trees will guide the replacement of existing trees over time due to age or fire vulnerability. For wildlife corridors to function, they need to connect areas of larger open space where the life cycles of species can be completed. The area surrounding the project site is completely developed, with development types including residential, commercial, industrial, cemeteries, and the Interstate 280 freeway. The small, narrow areas on the margins of the project site are situated in a dense, urban context and have limited value as a potential stepping stone corridor, primarily for winged species. This limited wildlife corridor value will be retained by the project.

Comment DD.14: DEIR Page 68 Impact BIO-6: The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (No Impact)

While the community garden does not have any habitat conservation plan or natural community conservation plan, or other local plan, the garden has been in place for decades and portions of it have provided important habitat for wildlife in an urban environment. Preserving this small part of

the project site would retain the important biological resources currently using this area but would not adversely impact the goals of the redevelopment of the larger site.

Response DD.14: This comment notes retaining the garden would preserve whatever habitat value it currently provides. As discussed in the Draft EIR, the two biological reports supporting the Draft EIR, and in prior responses above, the garden does not provide critical habitat for special-status species, and therefore its removal with the project would not constitute a significant impact. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment DD.15: DEIR Page Cumulative Impacts Impact BIO-C: 'The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. (Less than Significant Cumulative Impact with Mitigation Incorporated)'

We disagree with this assessment. In addition to habitat loss from Parcel F and surrounding area, and a significant reduction in habitat quality for remaining habitat, there is the added impact of significant increase in light pollution extending several stories into the skyline, with all of the added noise, vehicles, light pollution, air pollution, and congestion associated with 1,457 new residences and 32,00 SF of commercial/retail space to an already impacted, populus area. The pen space and landscape plan proposes to provide an ecologically sterile, grass park which is a poor choice for water conservation in the face of rising temperatures and drought. Landscaping with native, local drought tolerant species would be a vast improvement.

Response DD.15: Cumulative impacts take into account baseline conditions in combination with the future site conditions and known reasonably foreseeable future projects. The baseline condition within and surrounding the project site is one of dense urban development which already contains significant sources of noise, light, and other human-induced disturbance. The project site itself is currently developed and has been subject to substantial historical disturbance, with existing conditions that are sources of light, noise, and other human disturbance such that it does not closely resemble its original ecological condition or provide any substantial habitat for biological resources. Redevelopment of the project site will not substantially change these baseline conditions on its own or in combination with other reasonably foreseeable projects in the vicinity.

Comment DD.16: Environmental Collaborate Biological Resources Assessment
A Environmental Collaborative biologist conducted reconnaissance level surveys of the project site on 14 January, 5 April, and16 June 2021. The April and June field surveys were focused on the willow and meadow habitats. It does not appear that seasonal surveys for plants or wildlife were conducted to detect all potential plant or wildlife species that could occur onsite.

The BRA lacks any lists of plants or wildlife observed onsite. Only a few species are mentioned in the text, which is insufficient. Botanical surveys should be floristic in nature to ensure that all plants that are considered sensitive (statewide or locally) are detected. The reviewer has no means to determine if the field surveys were sufficient since there are no lists of what was observed.

Response DD.16: Please refer to Response DD.3: regarding special-status plant surveys. Similarly, if a site is determined to not contain suitable habitat for special-status wildlife species, then no additional surveys for special-status wildlife species are necessary.

Comment DD.17: Cultural and Social Significance of Open Space

From a cultural and social perspective, this open space supports a vital community garden that adds intrinsic cultural and educational value as a gathering place for the local community and provides a means to grow produce, connect with nature, and each other.

Response DD.17: The comment expresses an opinion about the significance of the demonstration garden. Please refer to Master Response 1: Demonstration Garden, Master Response 6: Recreation, and Master Response 7: Tribal Cultural Resources above.

Comment DD.18: Conclusion

Based on our assessment of the methods and conclusions presented in the DEIR and supporting documents, the assessment of impacts on biological resources at the project site are inadequate and failed to follow specific methods and to identify potentially significant adverse impacts to those resources.

Appropriate seasonal field surveys must be conducted before conclusions about the presence or absence of sensitive resources can be made. The project site does contain sensitive resources, such as wetland habitats, which should either be protected or mitigated, preferably onsite.

An alternative could be to just avoid areas with wetlands and wildlife habitat, which would avoid many if not all potentially significant impacts to those resources.

Please contact us if you have any questions or require further information.

Response DD.18: This is a concluding statement that references issues that were raised in prior comments, and were each responded to previously in detail; therefore, no further response is required.

EE. Pacifica Social Justice (dated September 7, 2023)

Comment EE.1: Pacifica Social Justice (PSJ) is submitting the following comments regarding the Serramonte Del Rey Project Draft EIR (DEIR). These comments are a supplement to the comments submitted on behalf of PSJ by Grassetti Environmental Consulting (attached) which address many issues regarding the content of the DEIR.

PSJ believes that the project DEIR is deficient in addressing many required items and also does not address adverse impacts that PSJ and other community members have raised in public meetings and in written communications to Daly City and the Jefferson Unified High School District (JUHSD). Pacifica is particularly impacted by this project because the two High Schools in Pacifica are part of the JUHSD, and it is JUHSD land which is proposed to be converted to this private use.

The project proposed by JUHSD involves land previously used as a public high school, and which currently houses community recreational programs, a head start program, and a community garden.

> **Response EE.1:** This is an introductory comment and restates the proposed project. No further response is required.

Comment EE.2: The property is part of the unceded ancestral homeland of the Ramaytush Ohlone peoples. Although the DEIR claims to address the 22-acre project site, divided into five remaining parcels (B-F) the only specific development plan provided is for the 4.3 acre Parcel B. Parcel A contains 122 units of newly constructed workforce housing, of which 12 are considered below market rate.

Although the DEIR and attachments include environmental modelling that purports to address various phases of the project as well as when the project is occupied, no specifics are provided that can be used to evaluate the impacts and mitigation measures mentioned in the DEIR. Several specific features of this site must be taken into account in the development of each parcel and may affect the results of any modelling.

PSJ has asked for development plans for Parcels C-F and the basis for modelling impacts of construction and use and was told the information is not available, and the only option was to raise the questions in the context of comments on the DEIR. So we hereby renew our request for the development plans for Parcels C-F. We do not believe that Daly City is acting with due diligence in considering approval of an EIR that does not contain relevant information about the development and use of the site.

> **Response EE.2:** Please refer to Master Response 4: Project Description above.

Comment EE.3: Grassetti Environmental Consulting has addressed many issues not addressed in the DEIR, including the existing wetlands at the community garden site, and the impact destruction

of the garden will have on biological diversity, and sensitive species. The following are additional specific comments on the DEIR.

> **Response EE.3:** Responses to the issues raised by Grassetti Environmental Consulting were provided previously, please refer to responses to Comment Letter F, above.

Comment EE.4: A. Section 3.11 Land Use and Planning
Section 3.11.2.1 states:

"The proposed project would comply with the City's Inclusionary Housing Ordinance (Chapter 17.47 of the City's Municipal Code), which requires 10 percent of rental units to be low-income units. According to the Ordinance, a lack of new affordable units will have a substantial negative impact on the environment because: (1) housing will have to be built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the workers they need. Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers. The proposed project would construct housing within the City of Daly City and it aligns with the City's Inclusionary Housing Ordinance in providing at least 10 percent affordable housing"

Non-Compliance with Daly City Inclusionary Housing Ordinance (Municipal Code Chapter 17.47)

The DEIR correctly identifies the importance of compliance with the Inclusionary Housing Ordinance in reducing environmental impacts of the project, such as increased noise and air pollution due to increased traffic and transit demand. However, it incorrectly states that the project as described complies with that ordinance. The project as described violates the ordinance in four important ways:

1) Inclusionary Housing Units must be provided at an Affordable Rent to households whose annual income does not exceed Low Income (17.47.070), however the plan includes middle income as well as low-income units in the 10 percent of planned units indicated as "affordable."
2) Inclusionary Housing Units must be built at the same time as other units, and for phased projects, must be proportionately built at the same time (17.47.090), however no inclusionary units are planned for Parcel B, which is the only Parcel to be developed in the next two years, and the only parcel for which a specific Plan is proposed.
3) Inclusionary Housing Units must be "dispersed" throughout the residential development (17.47.100), however, no inclusionary units are proposed for Parcel B, and according to the "Precise Plan" on the JUHSD website, 100 of the 111 of the required affordable units are to be located in the Parcel C building. (see Appendix A for Table 1 Aggregate BMR Units Developed Per Phase)

4) Inclusionary Housing Units must have "the same amenities as the Market-Rate Units, including the same access to and enjoyment of common open space and facilities in the Residential Development" (17.47.100), however the DEIR description of Parcel B includes "Open space serving the residents of the building would include both the ground floor terrace and the roof terrace, up to 20 private balconies for individual units, and an approximately 20,300 square-foot courtyard located on the roof of the parking deck of the mixed-use building which includes amenities such as a hot tub, fire pit, lounge furniture, and an outdoor kitchen." [emphasis added]. No similar representation is made for the building in Parcel C, which will be predominantly below market rate.

Response EE.4: Please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above. In addition, the excerpted Draft EIR text in the comment notes the project would provide at least 10 percent affordable housing. Since publication of the Draft EIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment EE.5: Non-Compliance with the California Education Code and Government Code

This project proposed by the JUHSD would convert this public resource into private use. The JUHSD has not shown, despite repeated requests, how it has complied with requirements of the California Education Code, Section 176459, referring to Government Code Section 54220 to first offer surplus lands resulting from school closure for the purpose of low-income housing and for park and recreational purposes, nor has it shown how it was made available to specified park and recreation departments (Education Code Section 17459).

This is antithetical to the stated legislative purpose,

GC 54220(a) The Legislature reaffirms its declaration that housing is of vital statewide importance to the health, safety, and welfare of the residents of this state and that provision of a decent home and a suitable living environment for every Californian is a priority of the highest order. The Legislature further declares that there is a shortage of sites available for housing for persons and families of low and moderate income and that surplus government land, prior to disposition, should be made available for that purpose.
(b) The Legislature reaffirms its belief that there is an identifiable deficiency in the amount of land available for recreational purposes and that surplus land, prior to disposition, should be made available for park and recreation purposes or for open-space purposes…

In summary, the project as only partially described in the DEIR creates a negative impact on land use policy, by not providing significant low-income housing in this major development. This will have a negative environmental impact by forcing people to live further from work and social services, therefore increasing commute times, traffic, vehicle miles per day, air pollution and noise. It will also have a negative impact on communities of northern San Mateo County by limiting diversity in housing.

Response EE.5: As property owner, it is the obligation of the JUHSD to demonstrate compliance with the California Education Code and Government Code regarding surplus lands, and not a CEQA issue for the City of Daly to demonstrate in the Draft EIR; therefore, the process by which the JUHSD has satisfied the referenced state codes is not discussed in the Draft EIR. The Draft EIR evaluates the project as proposed by the JUHSD as applicant for development of the site.

Comment EE.6: B. Section 3.14 Population and Housing
Non-Compliance with Residential Housing Needs Allocation and Daly City Housing Element

As discussed in the attached letter from Grassetti Environmental Consulting, the DEIR does not address the proposed project compliance with the Residential Housing Needs Allocation. The DEIR states that the Daly City 2023-2031 RHNA "includes 1,336 very low income units, 769 low income units, 762 moderate income units, and 1,971 above moderate income units…" The 1235 proposed units addressed in the DEIR would constitute more than 25 percent of the 4838 units addressed in Daly City's RHNA, but would provide only 6 percent of the affordable units required. This creates an unrealistic pressure on other proposed housing projects in Daly City to provide housing for lower income residents, and is likely to make Daly City non-compliant with the RHNA.

Response EE.6: Please refer to Master Response 2: Regional Housing Needs Allocation above.

Comment EE.7: The DEIR does not consider the impact of the loss of the community garden on the community and the environment in the area. Daly City is the largest city in San Mateo County, and is the 9th most densely populated city in the country. According to the Daly City City Manager, "Daly City is truly an impervious, concrete jungle. The urban canopy is estimated to cover less than 5% of the land area. Vegetation that does exist is largely introduced ornamentals and invasive species." (https://www.dalycity.org/319/Project-Green-Space#:~:text=As%20the%20largest%20city%20in,introduced%20ornamentals%20and%20invasive%20species.)

The proposed project is located between two freeways and adjacent to major streets. The community garden provides a rare break in this neighborhood. The DEIR does not adequately address the loss of this community resource. The lawns and plantings mentioned in the DEIR are not equivalent to the established trees of the garden and the ecosystem that currently exists.

The "defensive architecture" recently constructed at the garden by the JUHSD, including fencing, removal of benches, and locking the gates for most hours, and security patrols, have already diminished the community use of the space. The assessment regarding the environmental impact of turning this beloved community garden into a dump for removed construction materials for most of the decade of construction, should be based on the value that the garden has provided over its decades of existence, and on the resource it can be, if not buried under tons of removed concrete and other construction debris.

Response EE.7: Please refer to Master Response 1: Demonstration Garden, Master Response 6: Recreation, and Master Response 7: Tribal Cultural Resources above.

Comment EE.8: Section 7.0 Alternatives
CEQA requires the DEIR to evaluate alternatives to the proposed plan that may lessen significant impacts. The DEIR analyzes only the proposed project, and provides only a "no build" alternative. The DEIR does not analyze other alternatives, including alternatives that have been addressed by the affected community, which would include maintaining the existing community garden, conformance with Daly City's Housing Element/RHNA and the Daly City Inclusionary Housing Ordinance, maintenance of existing community resources including recreational facilities and trees, changes to planned density, and improved community access.

Another alternative proposed by community members and not discussed in the DEIR is return of this "surplus" public land to the Raymatush Ohlone, who are the historic and rightful owners of the land.

Response EE.8: Please refer to Master Response 8: Alternatives above. In addition, the comment is incorrect in stating the Draft EIR only considers a 'no build' alternative, when the Draft EIR includes discussion of developing the campus under the current Planned Development zoning district covering the site, which is a scenario that also involves substantial new development. The suggested alternative of disposing of the campus to a Native American tribe is not presented in the Draft EIR because it would not achieve the project objectives related to development of substantial housing on the site (in support of the City's Housing Element) and generation of revenues to support the JUHSD's finances. Moreover, the project site is not a natural landscape but was completely regraded and redeveloped decades ago. The Draft EIR evaluated the potential impacts of the project on cultural resources and determined impacts would be less than significant. The actions proposed by the commenter are not necessary to cure any environmental impact, and imposition of such a condition would not be legally feasible as it would violate laws that include, among others, the Mitigation Fee Act. Further, the project complies with all local, state, and federal law, and no alternative requiring compliance with such is therefore necessary.

FF. Debbie Santiago (dated September 7, 2023)

Comment FF.1: Please see 2 attached PDF files that include my petition and a few comments made by some of the 4,542 people who signed it.

Please include all the photos and videos I linked to in the petition as comments on the DEIR, including the historic photos, recent photos and wetland photos and videos.

Let me know if you have any questions.

Response FF.1: Please refer to Appendix B Draft EIR Comment Letter Attachments for full printouts of the petition and signers comments. This comment and the petitioners comments do not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

GG. NAACP (dated September 8, 2023)

Comment GG.1: The NAACP San Mateo Housing Committee has reviewed the Serramonte Del Rey Draft Environmental Impact Report (DEIR) and we provide the following comments:

DEIR is Incomplete

The DEIR Project Description provides a detailed account of an unrelated project, the Jefferson Union High School District Offices Project (Figure 2.2-6), but surprisingly omits any mention of development plans for Parcels C-F within the project site. The Precise Plan is available on the school district's website however it's not described in the DEIR, which only includes the parcel plan (Figure 2.2-5) and Area B plans from the Precise Plan. The DEIR lacks essential development details, neglecting to provide even the most fundamental aspects of the plan. Specifically, there are no provisions for access improvements, infrastructure enhancements, a comprehensive site layout, or other critical information for areas beyond Parcels A and B.

Response GG.1: Please refer to Master Response 4: Project Description above.

Comment GG.2: Separate and Unequal Apartment Buildings

During the Daly City Planning Commission meeting and Daly City Council meetings, JUHSD Trustees introduced the Precise Plan and discussed the project at length on behalf of JUHSD and responded to questions from Planning Commissioners and Councilmembers. The Trustees' presentations left no room for doubt, as they clearly conveyed that all BMR apartment units, excluding those already constructed within a separate teacher housing project, would be consolidated into a single building. However, the Trustees' statements were inconsistent with information provided in the Precise Plan, which states the following on page 14:
"Diversity of Housing. Affordable and market rate rental housing is mixed-throughout the site. 122 units of affordable housing for JUHSD Faculty and Staff, which includes very-low, low, and moderate-income rental dwelling units, are at the corner of Serramonte Boulevard and Entry Drive. A second affordable housing development is planned along East Drive, at the southeast corner of the Plan Area. The balance of affordable housing is spread throughout the three other residential development sites."

Response GG.2: As discussed in Response CC.14: above, the precise location of affordable units across the 22-acre site, whether dispersed among several parcels or clustered within one or two parcels, would not alter, compared to what is disclosed in the Draft EIR, the nature or severity of the environmental impacts that would

result from the construction or occupancy of those units, provided the total number of units within the project area remains consistent with the parameters on which the DEIR analysis was conducted set by the Precise Plan (see Draft EIR page 3). Rather, the location and distribution of affordable housing units within the site is a planning issue, and not related to the project's environmental impacts. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. See Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment GG.3: DEIR is Deficient by Omission and the Project is Non-Conforming

The omission of Areas C-F in the DEIR has created a situation where conflicting information regarding income segregation within the project remains unresolved. Clustering all BMR units within a single building within a multi-building apartment complex is not only inconsistent with Daly City's Inclusionary Housing Ordinance 1423 but also is non-conforming to AB 491 the 'Affordable and Market Rate Units' law signed by Governor Newsom on September 28, 2021. Such concentration of BMR units isolates them and fails to demonstrate a commitment to 'Affirmatively Furthering Fair Housing'(AFFH).

Response GG.3: Please refer to Response GG.2: and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment GG.4: Is the Project Within the Law?

Economic segregation and the resulting racial segregation within a project on public lands may violate federal, state, local laws, ordinances, codes, and policies.

- Education Code: ARTICLE 4. Sale or Lease of Real Property [17455 - 17484]

Response GG.4: Please refer to Response EE.5: above regarding the education code. This comment is not related to the DEIR's analysis of the project's environmental impacts, and instead focuses on economic and social issues beyond the purview of CEQA.

Comment GG.5: Government Sponsored Segregation

Established in 1909, the NAACP has a storied legacy of opposing government-sponsored segregation. Such practices contradict the principles of equality, perpetuate social, and economic disparities, and inflict adverse consequences upon individuals, communities, and society at large. They are universally acknowledged as a violation of human rights and a formidable impediment to the realization of inclusive and equitable societies.

Response GG.5: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment GG.6: Noncompliant with City's Inclusionary Housing Ordinance

In 2022, this Committee sent two letters to Daly City Councilmembers expressing our concerns about JUHSD's plan to impose government-sponsored economic segregation on public lands within the Serramonte Del Rey project. Economic segregation is particularly worrisome, given that only a minimal 10% allocation has been designated for affordable apartments within the project. Additionally, the School District's strategy of concentrating all 111 affordable/low-income units within a single "poor door" building while distributing 1002 market-rate apartments across four other buildings does not comply with the city's Inclusionary Housing Ordinance and can be expected to perpetuate low socioeconomic status and racial segregation.

> **Response GG.6:** Please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment GG.7: Preserve Public Uses and Keep Public Land Public

The significant impact of losing public amenities due to the project's transition to a 100% private lease of public land has not been adequately addressed in the DEIR. The project should prioritize the preservation of public uses. Any project on public land should make every effort to maintain, preserve, improve, or offer equivalent like-for-like replacements for existing public uses.

The public uses of the site include the almost 2-acre community garden that's open to the public, the school, and the gymnasium. Residents in affected neighborhoods endure adverse living conditions and encounter obstacles in accessing healthy environments, leading to inferior health outcomes and shorter lifespans. Low-income and Environmental Justice Communities of Concern (EJOC) bear an unequal burden of pollution from industrial and transportation sources, resulting in detrimental health outcomes.

> **Response GG.7:** Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation above regarding loss of the garden and recreational uses. The conversion of public lands to private leases is not an environmental issue addressed through CEQA and, therefore, is not discussed in the Draft EIR.

Comment GG.8: The profound and often unjust health and social consequences resulting from the challenges posed by COVID-19 and climate change have underscored the importance of providing ample outdoor access through parks and community gardens. Preserving public amenities for public use within a project of this scale is imperative. The proposed Serramonte del Rey project converts public land to private use without adequately compensating for the amenities that will be lost.

The City should implement a Growth Management Policy mandating that neighborhood-scale developments such as Serramonte Del Rey provide sufficient public facilities and amenities including parks and community gardens, with the goal of enhancing the overall environmental

quality and living standards in Daly City. The project is marketed as a transit-oriented development, yet it fails to contribute to air quality improvements or offer access to equivalent public open space.

- There should be a project alternative with higher density that does not segregate housing and recreational amenities by income, preserves public access, and retains the community garden in its current location as a park. This alternative would align with public goals to promote public uses, improve air quality, enhance public health and safety, and avoid the segregation of lower-income groups.
- The project area, as is typical for Daly City, poses significant challenges for pedestrians and cyclists when it comes to accessibility and transit connectivity. The 15-year phased construction of a pedestrian and bike trail further exacerbates this issue and it should be corrected.

Response GG.8: Please refer to Master Response 8: Alternatives above regarding selection of alternatives. As discussed in Section 3.17 Transportation under Impact TRN-3 of the Draft EIR (pages 180-181), the project would be required to implement mitigation measure MM TRN-3.1 during construction. Implementation of this mitigation measure would ensure pedestrians and bicyclists would have safe access to and around the project site during project construction. Furthermore, as discussed under Impact TRN-1 in Section 3.17 Transportation of the Draft EIR (page 177), all pedestrian facilities improved by the project would be ADA compliant. With respect to the assertion that the project's environmental review should evaluate a higher density project "that does not segregate housing and recreational amenities," please see Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law. The project violates no local, state, or federal laws.

Comment GG.9: Preserving Public Uses Such as Community Gardens and Parks

JUHSD is the owner of the 22-acre project site, which is a public asset. However, the current project plans privatize recreational amenities that play a crucial role in promoting health and wellness. This approach could leave low-income residents in unhealthy situations, depriving them of access to essential public spaces. Notably, the site currently houses a nearly two-acre community garden and orchard, which serves multiple vital functions. It improves air quality, increases access to fresh food, bolsters food security, educates residents about healthier dietary habits, promotes physical activity through gardening, reduces the risk of obesity and related health issues, supports mental well-being, offers relaxation, contributes to biodiversity, provides wildlife habitat, features a variety of plant species including native plants, boasts diverse trees and shrubs, including redwoods and fruit trees, and even includes a seasonal creeks and wetland. Furthermore, the garden plays a role in erosion control, natural flood prevention, and water quality improvement. It is also a critical component of climate change adaptation and resilience. The presence of children's toys within the garden underscores its widespread community use, essentially functioning as a park and food forest. Regrettably, if the project proceeds as currently conceived, all these valuable public benefits stand to be lost.

Response GG.9: This comment speaks to retaining current site features and amenities, and does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation above regarding loss of the garden and recreational uses.

Comment GG.10: Income Segregated Recreational Amenities and Incomplete Trail Access:

The amenities listed in DEIR section 2.2.2.2 Open Space and Landscaping (Exhibit B) include recreational facilities situated on public land, which should be accessible to all tenants and the public, as noted in the Oct 4, 2021 JUHSD Real Property Advisor Committee Report.

"Open Space" should be accessible to everyone and not restricted to private use.
Parcel B's recreational amenities encompass a rooftop hot tub, fire pit, and an outdoor kitchen, with the likelihood of a shared restroom facility for tenants utilizing the rooftop recreational amenities. Equivalent recreational facilities are not specified for the other Parcels. How will the public and tenants access the rooftop recreation area? Will they need a code or a key for access? Who will be responsible for providing access?
Why haven't the recreational amenities on Parcel B, which are categorized as "Open Space and Landscaping," been located in a way that ensures accessibility for all tenants and the public?

Response GG.10: This comment pertains to the design of the project and access to certain open space and recreational features included in the project, and does not relate to the project's environmental effects nor raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please also refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above for a discussion of Parcel B's amenities.

Comment GG.11: The project area, as is typical for Daly City, poses significant challenges for pedestrians and cyclists when it comes to accessibility and transit connectivity. The project area, as is typical for Daly City, poses significant challenges for pedestrians and cyclists when it comes to accessibility and transit connectivity. A complete trail must be constructed concurrently with Parcel B development to ensure a safe route is available for all residents, students, and medical office workers traveling from Serramonte to Hickey.

DEIR 2.2.2.2 Open Space and Landscaping (page 16)
The proposed Parcel B development project would include three components of open space to be used by the public: 1) approximately 22,300 square-foot public park that would include a large grass area and playground; 2) the first phase of the recreational trail (approximately 6,800 square feet) that would be located in the southeast corner of Parcel B; and 3) open space for public use at the retail plaza (approximately 7,000 square feet) facing the new entry road (see Figure 2.2-10). Open space serving the residents of the building would include both the ground floor terrace and the roof

terrace, up to 20 private balconies for individual units, and an approximately 20,300 square-foot courtyard located on the roof of the parking deck of the mixed-use building which includes amenities such as a hot tub, fire pit, lounge furniture, and an outdoor kitchen. The open space reserved for residential use plus the retail open space for public use at Parcel B would exceed the City's requirement for open space of 150 square feet per unit and is consistent with the proposed Precise Plan.

Response GG.11: Please refer to Response GG.8: above regarding bicycle and pedestrian safety.

Comment GG.12: Significant Impact: Lack of Affordable Housing

Its certain that only a limited number of Daly City residents will be able to afford rents at the new SDR apartment complex. The historical consequences of redlining have had a generational impact, leading to significantly reduced household equity and making it much more challenging for affected families to afford housing in the Bay Area, as noted in the Daly City 2023-2031 Housing Element.

53% of Daly City's households do not meet the 'moderate' level average median income (AMI). However this project is seeking to build 90% of its units for market rate rentals. This will effectively lock-out those coming from historically redlined communities, and keep them from becoming beneficiaries of the Serramonte del Rey housing development.
The project proposes only 10% of the units as 'low' income BMR units, the absolute minimum under the City's inclusionary Housing Ordinance (adopted in 2018). Jarringly, 42% of Daly City's RHNA allocation for 2023-2031 is required to be in the 'low' or 'very-low' income housing categories, far beyond what's being proposed. Under this scenario, low income residents will continue to be displaced to far away places while we wait for other projects to pick-up the slack with higher allocations of affordable units. (See Exhibit A)

Limiting the affordable housing component to just 10% while prioritizing market-rate units over a more balanced approach will perpetuate unaddressed historical inequities and sustain the legacy of redlining. Failing to actively address segregation contributes to the entrenchment of racism. With 90% market-rate housing SDR is perpetuating racial segregation as the prevailing development model in Daly City, in direct contradiction with the principles outlined in Daly City's own Housing Element. To correct historic patterns of segregation the project proponents should be committed to a significantly higher proportion of affordable housing units, going beyond the inclusionary minimum and using the RHNA target as a goal.

DEIR 3.11.2.1 Project Impacts (page 124)

According to the Ordinance, a lack of new affordable units will have a substantial negative impact on the environment because: (1) housing will have to built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the

workers they need. Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers.

Response GG.12: Please refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above. In addition, the comment notes the project would provide at least 10 percent affordable housing. Since publication of the DEIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment GG.13: Significant Impact: Low-Income Tenants Parcel C Denied Access to Emergency Services

The Head Start program offers affordable childcare services, and it's worth noting that all Below Market Rate (BMR) apartments are situated in Parcel C. Given this, it raises a valid question as to why an emergency generator is not being provided for Parcel C.

DEIR Emergency Generators (page 142)

Emergency generators are proposed to be located on Parcels B, D, E, and F. Generators would be located either in the basement or on the ground floor.

Response GG.13: This comment expresses a concern that power will not be distributed to any residential structure on Parcel C in the event of an emergency because the DEIR identifies emergency generators as being located on Parcels B, D, E and F. Use of or lack of emergency generators in a residential building to protect from power outages is not considered an impact under CEQA, nor is there any legal requirement under any framework to include a generator on any specific portion of the project site. However, four generators were assumed in the DEIR and their placement was based on conservative factors, including proximity to residential receptors. For instance, Parcels E and F are located adjacent to apartment buildings. Accordingly, generator assumptions were made to ensure the environmental analysis was conservative to account for the noise and emissions resulting from routine generator testing and maintenance.

Comment GG.14: Economic Segregation and Racial Segregation are Intertwined

Economic segregation occurs when individuals or families with lower incomes are confined to certain neighborhoods, or a single building within a multi-building development, due to affordability constraints. This pattern often results in racially homogeneous housing, as people of similar economic backgrounds often share similar racial backgrounds. Consequently, concentrating lower income families in separate buildings creates racially homogeneous social networks that limit access

to educational and employment opportunities. This is a self-perpetuating cycle that sustains economic disparities, economic segregation, and racially segregated housing.

Response GG.14: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment GG.15: Socioeconomic Status

Socioeconomic status (SES) encompasses not just income but also educational attainment, financial security, and subjective perceptions of social status and social class. SES can encompass quality of life attributes as well as the opportunities and privileges afforded to people within society. The relationship between SES, race, and ethnicity are intertwined. Research has shown that in terms of socioeconomic stratification, race and ethnicity often play significant roles in determining a person's SES. Communities affected by low SES, driven by factors like income-based housing segregation, share common experiences, such as limited economic development, substandard health conditions, and fewer educational opportunities. Persistent low SES has been identified as a contributing risk factor that disproportionately affects communities of color residing in income-segregated housing.

Response GG.15: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment GG.16: Social-Spatial Segregation

In addition to the project's socioeconomic segregation, there is the problem of social-spatial segregation. Currently, funding has not been allocated to establish a connection between the pedestrian and bike trail and the BMR building, thereby depriving underserved children of a safe route to and from school. Social-spatial segregation is also apparent by the absence of a rooftop Jacuzzi spa for families in the affordable building, while it is provided to market-rate tenants on Parcel B. The proposed plans raise concerns of income-based discrimination, as emergency generators are exclusively installed in all market-rate buildings, with no provision for the low-income building. Additionally, placing an income segregated daycare center on Parcel C underscores its stigmatization as an income segregated area of the development.

In conclusion, we firmly believe that the residents of Daly City would benefit from a denser project that does not segregate income groups into a separate building. The project should prioritize improving public access and providing more public amenities. Lastly, we advocate for the preservation of the existing community garden.

Response GG.16: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required. Please also refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above for a discussion of Parcel B's amenities.

Comment GG.17: Please include the following documents and videos in their entirety as comments on the DEIR:

1. Two NAACP letters dated October 6, 2022, and June 10, 2022
2. May 2023 - City of Daly City Housing Element 2023-2031
3. AB 491 Ward, CA Poor Door Law approved by Governor Sept 28, 2021
4. Civil Rights in America: Racial Discrimination in Housing report from the National Parks Service, U.S. Department of the Interior and National Historic Landmark Program
5. Oct 4, 2021, JUHSD Real Property Advisor Committee Report
6. 'Affirmatively Furthering Fair Housing' - The Fair Housing Act requires HUD and its recipients of federal financial assistance to do more than simply not discriminate; they must take meaningful actions to overcome patterns of segregation and foster inclusive communities.
7. Education Code: ARTICLE 4. Sale or Lease of Real Property [17455 - 17484]
8. Video of Daly City Council Meeting January 10, 2022
9. American Psychological Association's publication on Ethnic and Racial Minorities & Socioeconomic Status
10. How American racism is rooted in residential segregation, Berkeley News, by Ivan Natividad
11. Why Bay Area neighborhoods are still racially segregated, Berkeley News, by Ivan Natividad
12. Redlining's Legacy of Inequality: $212,000 Less Home Equity, Low Homeownership Rates For Black Families, Redfin News, by Dana Anderson
13. April 25, 2022 - JUHSD RFP FAQ for BMR Developer: Parcel C
14. Jul 29, 2021, How Daly City Became One of the Most Densely Populated Cities in the Country, KQED, by Amanda Stupi
15. Jun 28, 2020, Un-forgetting the segregationist history of Palo Alto (and Daly City, and San Francisco, and…) by Charles Russo / Palo Alto Online & TheSixFifty.com
16. October 4, 2021, The Legacy of Redlining in the Bay Area: Explained, NBC Bay Area
17. June 9, 2022, 'The Moms of Magnolia Street' Documentary, NBC Bay Area Investigative Unit

Response GG.17: Please refer to Appendix B Draft EIR Comment Letter Attachments for full printouts. The additional documents provided do not raise specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

HH. Daly City Community Garden Alliance (dated September 8, 2023)

Comment HH.1: The Daly City Community Garden Alliance is submitting the following comments regarding the Serramonte Del Rey Project Draft EIR.

This statement applies to each of our comments:

We address the following issues by category within the draft Environmental Impact Report (DEIR). CEQA provides a "substantive mandate that public agencies refrain from approving projects for which there are feasible alternatives or mitigation measures" that can lessen the environmental impact of proposed projects. (Mountain Lion Foundation v. Fish & Game Com. (1997) 16 Cal.4th 105, 134, citing Pub. Resources Code § 21081 [emphasis added].) "Without meaningful analysis of

alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." (Laurel Heights Improvement Assn. v. Regents of University of California (1988) 47 Cal.3d 376, 404 ["Laurel Heights"]; Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336, 1350.)

The cumulative impacts of this project have not been studied by this DEIR as we show in the following sections resulting in significant impacts to community, public health, and the environment. The DEIR should be redone.

Response HH.1: Please refer to the responses regarding the commenter's concerns below. Based on these responses, the Draft EIR does not require recirculation.

Comment HH.2: Section 7.0 Alternatives

The DEIR does not analyze other alternatives, including alternatives that have been addressed by the affected community, which would include:

CEQA requires the DEIR to evaluate alternatives to the proposed plan that may lessen significant impacts. The DEIR only analyzes the proposed project, and provides only a "no build" alternative. The DEIR does not analyze other alternatives, including alternatives that have been addressed by the affected community, which would include:

- Maintaining the existing community garden by massing a taller development closer to Serramonte.
- Conformance with Daly City's Housing Element/RHNA
- Conformance with Daly City Inclusionary Housing Ordinance
- Maintenance of existing community resources including recreational facilities and trees as pollution barriers
- Improved community access for the public and residents to all buildings
- Changes to planned density to improve community access to open areas as proposed in numerous community letters some of which are cited here.
- Have the property acquired by the state for 30x30 restorations as proposed by the Sierra Club under N-EO-82-20 to council March 9th, 2020.
- Return of this "surplus" public land to the Raymatush Ohlone

We request that our comments be added to the Draft Environmental report.

Response HH.2: Please refer to Master Response 8: Alternatives above.

Comment HH.3: In Summary: We addressed the following sections within the DEIR.

3.1 Aesthetics

- The DEIR is deficient in not recognizing the role of trees and community gardens as cultural aesthetic resources to neighbors and tribal groups. It also degrades the views by paving over green public spaces, privatizing the space and filling in space with toxic materials like astro turf that will leach PFAS into humans and water runoff.

3.2 Agriculture and Forestry Resources

- The DEIR is deficient in not addressing the lists of trees, plants provided in the petition started by Debbie Santiago and should be redone or recognize the garden as Urban Agriculture addressing food insecurity in the neighborhood, as depicted by comments to Daly City on this project. The DEIR needs to be redone.

3.3 Air Quality

- Tree Removal and Highway Vegetative Barriers
  The deficiency of the DEIR to address known threats to public health and the natural environment via a feasible functioning Vegetative Highway Barrier and how this affects every community in Daly City needs to addressed given its location within the dirty air of three freeways, 1, 35, 280 and one major road, Serramonte Blvd.

3.4 Biological Resources

- The current plan destroys the natural Habitat area of the Garden and causes a significant impact that is not studied in this DEIR. For example the Trees, Plants, Animals were not inventoried in the DEIR but have been provided to the City and JUHSD by the Garden community. This deficiency needs to be corrected since it is in contradiction to the Daly City 2030 General Plan.

3.5 Cultural Resources

- The DEIR is deficient because it does not look at tribal resources like medical and cultural plants, sacred space, the presence of the garden as the availability of open space to the community, and access to the gymnasium as cultural resources that will be lost to the community.

3.6 Energy

- The DEIR ignores the impact from increased energy use in two ways, first by only studying Phase A and B instead of the entire project as required by CEQA and two by ignoring the feasible solutions proposed in comments on this project. The DEIR should be redone to study the impact of the entire project.

3.7 Geology and Soils

- We support the concerns raised in a letter from the Sierra Club to this EIR.

3.8 Greenhouse Gas Emissions

- The project increases greenhouse gasses, vehicle miles traveled, and dirty air quality, all which should be reduced according to the California Air Resource Board 2022 Scoping Plan

under SB32. The DEIR says VMT cannot be mitigated to a less than significant level for air quality, vehicle miles traveled, and greenhouse gasses despite the feasible means of doing so that we provided. However the VMT calculated is not correct because it is only based on Phase A and B requiring the DEIR to be redone.

3.10 Hydrology and Water Quality

- The EIR should be redone to correctly analyze the impact of runoff and dangers to the community in an era of increased atmospheric river runoff as Congressman Kevin Mullin says here from paving over the garden and increasing roads through the project.

3.11 Land Use and Planning

- The DEIR has stated that the 90 percent market rate housing proposed for this site is compliant with law and policy. This statement is incorrect. The plan violates both the Daly City Inclusionary Housing Ordinance, and is not consistent with the Residential Housing Needs Allocation (RHNA) and therefore the draft Daly City Housing Element. The DEIR should be redone.
- The DEIR is deficient in not looking at the significant harms from the loss of public lands to privatization that could have been feasibly preserved and should be redone.

3.13 Noise

- The DEIR is deficient because no mitigation measures on construction noise references Shasta High School.

3.14 Population and Housing

- The DEIR states that the RHNA "includes 1,336 very low income units, 769 low income units, 762 moderate income units, and 1,971 above moderate income units…" The 1235 proposed units addressed in the DEIR would constitute more than 25 percent of the 4838 units addressed in Daly City's RHNA, but would provide only 6 percent of the affordable units. This creates unrealistic pressure on housing in Daly City to provide housing for lower income residents.

3.16 Recreation

- The Draft EIR does not recognize that current Recreation is provided on site with the Gymnasium for 2 major established groups. The DEIR should be redone to correct this deficiency.

3.17 Transportation

- The project design has ignored feasible solutions that we provided to the planning commission on this project and not studied the entire project as required by CEQA to properly inform policy makers. In doing so the DEIR provides unsubstantiated reliance on TDM to ignore major health impacts from dirty air due to declining transit and the development of the project with upper income residences that do not take transit.

3.18 Tribal Cultural Resources

- The EIR is deficient in not preserving the garden as a cultural resource of native practitioners who lack access to sacred spaces as public spaces are privatized and should be redone. In addition the DEIR by not consulting with the Ramaytush Ohlone significantly omits a known source who could directly establish Historical Resource information for which the DEIR should be redone.
- The DEIR is also deficient in not pursuing a feasible strategy to mass the project near Serramonte and achieve multiple public policy goals mentioned in this document while preserving the garden for community health.

3.19 Utilities and Service Systems

- The DEIR is deficient in discriminately not feasibly protecting low income tenants from the effect of power outages such as the Public Safety Power Shutdowns.
- See also the comment under Energy.

Response HH.3: This comment is a summary of the more specific comments below. Please refer to the responses below regarding each environmental resource area.

Comment HH.4: Comments:

3.1 Aesthetics

- The DEIR is deficient in not recognizing the role of trees and community gardens as cultural aesthetic resources to neighbors and tribal groups. It also degrades the views by paving over green public spaces, privatizing the space and filling in space with toxic materials like astro turf that will leach PFAS into humans and water runoff.

Trees protect the community from extreme heat. The loss of trees is a hallmark of redlining and lower income areas. Community gardens are recognized as open space by the California Natural Resource Agency (page 31). They are essential to community food security, empowerment, and safe gathering public space. Replacing green spaces with privatized asphalt, concrete and buildings is recognized by the public as the loss of aesthetics and views.

Response HH.4: Please refer to Master Response 1: Demonstration Garden above.

As discussed in Section 3.1 Aesthetics under Impact AES-1 of the Draft EIR (page 27), the project site is located on an infill site within a transit priority area. Per SB 743, aesthetic impacts of residential and mixed-use projects in transit priority areas shall not be considered significant impacts. Thus the Draft EIR concluded that the project would not result in any significant aesthetic impacts. As described in the Draft EIR, pursuant to Municipal Code Chapter 12.40 – Urban Forestry, the City does not regulate the removal of trees except those within the public right-of-way, therefore the removal of trees on the school campus would not conflict with a local tree preservation policy. The Draft EIR further describes that the project is committed to replacing any removed trees at a 2:1 ratio.

Comment HH.5: 3.3 Air Quality

Tree Removal and Highway Vegetative Barriers

The DIER on pages 25 through 29 of Appendix C on Air Quality indicate that the development will have a significant impact on the HVBs (Highway Vegetative Barriers) which improve air quality adjacent to major roads, the surrounding natural environment and to public health. The project is located within three freeways, HWY 1, 35, and 280 and a major road, Serramonte. The overlay and footprint of the project site and parcels A-E indicate a majority of the trees and undergrowth on the perimeters of parcels A-D would be removed. These areas appear on the aerial photos to be heavily populated with dense stands of trees and undergrowth that would provide an effective pollution barrier for the residents. These barriers also likely provide some protection to residents living outside the project area from exposures to toxic and carcinogenic particulate matter and gaseous air contaminants from traffic emissions, both cars and trucks. Currently there aren't many gaps in the barrier. But the existing gaps could be feasibly filled with a few transplanted trees and plants by the developer, the city public works, or even a community youth conservation corps. The City of San Jose has the San Jose Conservation Corps. But it could be feasibly established with fees from new projects to safeguard public health. Additionally, the DEIR ignores the impact of air pollution in two ways, first by only studying Phase A and B instead of the entire project as required by CEQA and by ignoring the threat to public health without any reference to the existence of the pollution barrier that could be feasibly retained or the public health and environmental impacts of tree removal to public health, welfare, and the environment. The existing trees should be feasibly integrated into the early design of the development- if the project proponent took the impacts of air quality seriously as they have been mandated to do so. In California, sources other than tailpipes are the dominating source of traffic emissions, which will not be fixed by a trend toward electric vehicles, thus endangering public health.

The deficiency of the DEIR for this project is in not addressing known threats to public health and the natural environment and how this affects every community in Daly City, needs to be addressed.

Response HH.5: The comments statement that the air quality and greenhouse gas assessment (Appendix C of the Draft EIR) only evaluates partial construction of the proposed project is incorrect. The air quality analysis evaluates the full buildout of the proposed project (i.e., 1,235 residential units, 14,000 square feet of commercial uses, and 2,400 square foot childcare facility). As shown in Table 3.3-4 through Table 3.3-9 of the Draft EIR, the proposed project would not exceed the Bay Area Air Quality Management District (BAAQMD) thresholds for air quality impacts with implementation of mitigation measures MM AIR-2.1 through MM AIR-2.3 and MM AIR-3.1. Thus, the project would not result in any significant air quality impacts and adequately addresses air quality concerns under CEQA. As noted in the prior response, and described in the Draft EIR, pursuant to Municipal Code Chapter 12.40 – Urban Forestry, the City does not regulate the removal

of trees except those within the public right-of-way, therefore the removal of trees on the school campus is not within the City's discretion. The Draft EIR further describes that the project is committed to replacing any removed trees at a 2:1 ratio. Specific development plans exist for Parcel B, and the Draft EIR in Section 2.2.2.2 explains the project would preserve the mature trees along the perimeter of Parcel B and replace the trees that are determined to be in poor condition by a certified arborist. The project proposes to plant 82 new trees throughout Parcel B.

Comment HH.6: Air Quality Shasta High School
Pg 46 Construction Toxic Air Contaminants

As stated: the maximum annual PM2.5 concentration from construction was shown to occur on the first floor at the Summit Shasta High School adjacent to the southern boundary of the project. (as seen in Figure 3.3-1) and was estimated to be 0.29 ug/m3. This is not acceptable for the 400 students and additional staff in Shasta High School. This is +0.02 Hazard index as shown on 3.3-6.pg 46 . For impacts from the project see Table 3.3.-3 Project Consistency with Applicable 2017 BAAQMD Cap Control Measure Pg 40. The DEIR is inconsistent in not reducing PM2.5 to healthy levels.

Response HH.6: As shown in Table 3.3-6 of the Draft EIR, the $PM_{2.5}$ concentration of 0.29 $\mu g/m^3$ and hazard index of 0.02 are below the BAAQMD thresholds of 0.3 $\mu g/m^3$ and 1.0, respectively. Further, the project would be required to implement mitigation measures MM AIR-2.1 through MM AIR-2.3, which would further reduce $PM_{2.5}$ concentrations to 0.11 $\mu g/m^3$ and the hazard index to less than 0.01. Thus, during construction, students at Shasta High School would not be exposed to significant levels of $PM_{2.5}$.

Comment HH.7: [Clarification: Average start age of High School Students in the US is 14 which is under age 16. DEIR indicates age 16 is middle school and that is incorrect.]

Response HH.7: It is unclear what the comment is referring to, as the Draft EIR does not state age 16 is middle school. The Draft EIR, on page 34, only states that the California Air Resources Board (CARB) identified children under the age of 16 as sensitive receptors.

Comment HH.8: Developer states that "the project shall recycle and/or salvage for reuse a minimum of 60 percent of nonhazardous construction and demolition waste, consistent with Chapter 15.64" This statement is not factually correct, since a permanent gymnasium, administration buildings and former classrooms, and concrete on the entire surface of the project will need to be removed. Where and how will this be reused in the building of multi-story housing? There is no substantiation/explanation shown to prove this statement. The DEIR is deficient in not substantiating the claim that 60% of nonhazardous material will be recycled.

Response HH.8: Recycling and salvage of construction and demolition waste does not necessarily mean reuse in the proposed project's construction. Demolition waste may be sent to recycling centers for reuse in other projects. Neither Chapter 15.64 of the Daly City Municipal Code nor the 2017 BAAQMD CAP require that the project identify which future projects any salvaged material will be used for. The Draft EIR's analysis of project consistency with 2017 BAAQMD CAP is sufficient.

Comment HH.9: 3.4 Biological Resources

As mentioned on page 58 and 59 of the DEIR as quoted from the Daly City 2030 General Plan:

The general plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to biological resources and are applicable to the proposed project.

Policy LU-17 Ensure that private development is responsible for providing any on-or-off-site improvements related to and/or mitigating the impacts it causes.

Policy LU-18 Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.

- These two policies speak to the heart of the issue of the Destruction of the Garden –a 0.8 acre of over 100 trees, plants and animals living in this habitat.
- This significantly disrupts the natural environment and no reasonable measures are being taken to on or off site improvements or mitigating since it is total destruction.
- The current plan destroys the natural Habitat area of the Garden and causes a significant impact that is not studied in this DEIR. For example the Trees, Plants, Animals were not inventoried in the DEIR but have been provided to the City and JUHSD by the Garden community. This deficiency needs to corrected

Response HH.9: Please refer to Response DD.2: and Response DD.3: through Response DD.9: above regarding sensitive natural communities and special-status species.

Comment HH.10: 3.6 Energy

The DEIR ignores the impact from increased energy use in two ways, first by only studying Phase A and B instead of the entire project as required by CEQA and by ignoring the feasible solutions proposed in comments on this project. Thus impact 3.6.2 on page 86 is false.

Response HH.10: Please refer to Response HH.5: above regarding evaluation of buildout of the project. The annual project energy demand values presented in Draft EIR Table 3.6-1 are based on full buildout of the Precise Plan.

Comment HH.11: The feasible solutions left out of the DEIR despite pointing to them in scoping comments to the planning commission dated 6/7/21 (point 7 through 11) are

- Require all electric passive buildings per the recently adopted reach code to reduce greenhouse gasses over the lifetime of the units.
- The site should function as an island-able microgrid during grid instability such as Public Service Power Shutdowns.
- Design in recycled waste water treated on site by designing a living building to reduce reliance on public funding of infrastructure. Example: Salesforce Tower in San Francisco uses a water recycling system to treat gray water and black water from the building, reducing the need for 30,000 gallons of freshwater a day.
- Design in car share service to reduce parking at the rate of one per 20 as presently utilized in Austin, TX. All parking spots should provide electric charging stations.
- Add carshare and electric micro mobility hubs.
- Add an electric shuttle through SamTrans to connect other destinations such as school and transit hubs.
- Reduce the parking to 0.5 unbundled spaces per unit because of the shuttle and the 10-minute headway bus on Serramonte to achieve Transit Oriented Development status. The parking should be unbundled in a structure that is a park once and walk neighborhood. Unbundling reduces parking needs by about ⅓ according to MTC and reduces cost by about 20% which would benefit the residents of this structure. Unbundling would also improve transit use.

Response HH.11: As discussed in Section 3.6 Energy under Impact EN-1 of the Draft EIR (pages 82-83), the proposed project would comply with City Ordinance 1448, which requires all new residential buildings to be all electric. In addition, the project would be built to Title 24 and CalGreen standards to reduce energy use. Based on these requirements, the Draft EIR concluded that operation of the proposed project would not result in a wasteful use of energy. The various measures the comment suggests the project could employ are noted, however, the Draft EIR evaluates the project as proposed, and in light of the regulations, policies, and programs that are applicable. The additional measures provided in the comment can be considered by the JUHSD and the City decision-makers when acting on the project entitlements, however, they are not necessary to reduce significant energy impacts of the project, and do not need to be analyzed in the Draft EIR.

Comment HH.12: 3.8 Greenhouse Gas Emissions VMT

This DEIR is deficient in reducing VMT (Vehicle Miles Traveled) to reduce air and water pollution and greenhouse gasses. A significant impact is reported by the DEIR despite the feasible solution we provided to reduce VMT in our letter dated 8/3/21. The impacts are caused by the subdivision map employed which encourages driving and does not improve transit usage or bicycling and walking.

The DEIR claims substantial impacts from VMT, despite us pointing out this likelihood in our scoping comment to the planning commission dated 6/7/21 (point 1a, line 2.). The DEIR claims that the project is expected to result in almost 2 million driving miles (page 82). Our calculation (1800 cars x 25.2 daily mile/day x 260 work days) shows 11.8M miles. There is a large discrepancy here which spills over into how greenhouse gasses (GHG) are calculated. The GHG will be 11.8M miles times 20 lbs of CO2/g divided by Avg m/g 27 (page 8) divided by 2000 = 4370 Tons of CO2 annually from the project and 437037 gallons of gasoline consumed annually. The significant discrepancy exists even if we only count one car per unit which would reduce both the 11.8M miles, 4370 Tons of CO2, and 437037 gallons by a 1/3 each.

> **Response HH.12:** The comment incorrectly calculates the project's VMT number using Table 3.6-1 in the Draft EIR. The comment calculates the existing uses annual VMT number by multiplying 75,000 gallons of gasoline by 25.4 miles per gallon (mpg), which equates to approximately two million VMT annually by the existing campus uses. The Draft EIR estimates the project would generate an annual VMT of 18.6 million, which is found by multiplying the project's annual gasoline usage of 734,326 gallons of gasoline by 25.4 mpg. This number is far greater than the VMT number suggested by the commentor.

Comment HH.13: According to the DEIR, the number of 2M miles the project causes, has a significant impact on the countywide threshold (page 82). According to the California Air Resource Board (CARB) Scoping Plan 2022, Mobile Source Scenario page 105, projects should be reducing VMT by 15% by 2050 or 0.6%/year. This significant impact occurs despite the feasible solution we provided to reduce VMT in our letter dated 8/3/21 which states that

6. Require that the project be designed as a 5-minute neighborhood. This means all necessary services and public transit should be located within five minutes – schools, daycare, full grocery store, pharmacy, and BART station to ensure a low Vehicle Miles Traveled neighborhood. There should be a single u-shaped street through the project on which the bus that currently runs on Serramonte goes through the project to be transit oriented.

> **Response HH.13:** As discussed in Response HH.12: above, the commenter incorrectly calculates the project's VMT. The VMT analysis discussed in Section 3.17 Transportation under Impact TRN-2 of the Draft EIR (pages 178-180), accurately shows that with implementation of mitigation measures MM TRN-2.1, the project would reduce VMT to 15 percent below the Countywide and Regionwide average, and therefore, as judged on a per capita basis consistent with state Office of

Planning and Research technical guidance, project VMT would be less than significant.

Comment HH.14: Also on page 105 in Mobile Source, CARB says about the consequences of the subdivision map on VMT:

Meanwhile, growth in VMT, where it involves or incentivizes land conversion, impedes California's ability to store carbon and maintain resilient ecosystems and the life-sustaining resources they provide, including clean air and water, food, and fiber. (MS 105)

Which we also address in the 8/3/21 letter in item 4

Require that 50% of the site be preserved as a public park with the project facing the park not the freeway. Require that the park include the existing 20-year-old community garden.

People are driving mostly pickup trucks and SUVs, especially those who choose to live in new developments. The average fuel economy for these vehicles is below 20 mpg as low as 15mpg. On page 106 of the Mobile Source CARB says

Without additional policy intervention, VMT may continue to rise. California needs to re-envision its built environment in a way that reduces the number and length of trips people make, as well as make walking, biking, transit, and other mobility options become more viable.

Our 8/3/21 letter provides feasible means of "re-envisioning the built environment". Item 9 asks for the feasible and cheap "intervention" of car share and micro mobility to reduce parking and consequently also reduce VMT and Item 10 asks for an electric shuttle connection to BART. Our letter asks that the project be improved:

Please build a better project that decreases greenhouse gasses (GHG) and air pollution by preventing the increase in Vehicle Miles Traveled (VMT).

Response HH.14: Please refer to Response HH.13: above regarding VMT reduction.

Comment HH.15: On page 179 the DEIR says the mitigation measure for significantly increasing VMT is TDM (Transportation Demand Management). Any management proposal requires reporting and verification (MRV). Neither of the latter two are provided via independent sources. Instead the DEIR on 179 calls for self certification by the property owner with no examples of where this has been successfully implemented in San Mateo County to meet the goal of reducing VMT. An independent MRV would help the county meet the CARB goal since currently VMT is increasing 1% per year according to MTC since 2010 in the county.

The two strategies strongly correlated with reducing VMT are pricing (not included in the project) where good alternatives exist (which the DEIR says does) and reducing highway capacity (by

converting lanes to bus only, carpool etc.) which the region has not done- thus should be leading the project to reduce emissions by eliminating parking and putting in alternatives such as car share and a functioning network of bike share which it doesn't do.

Response HH.15: Mitigation measure MM TRN-2.1 includes the following requirement for reporting results to the City, "The results of the monitoring program and travel surveys shall be submitted to the City for review and approval. If the program VMT reduction goals are met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied". This mitigation measure includes a clear performance standard and a menu of TDM provisions that have been proven effective, including, without limitation, the study prepared by CAPCOA entitled Quantifying Greenhouse Gas Mitigation Measures Report, incorporated herein by this reference. Further measures identified by the commenter do not appear to be necessary, but they are not precluded by MM TRN-2.1, which allows for the inclusion of additional TDM strategies. The Draft EIR's mitigation is, therefore, as designed, effective and feasible, and satisfies CEQA.

In addition, potential TDM strategies include car share and bike share programs as mentioned in the comment.

Comment HH.16: Both VMT and emissions are increasing and the ability to meet CARB climate targets are decreasing because vehicle sizes are getting bigger leading to further decreases in walking and biking because unlike the feasible solution we outlined in our letter to the planning commission the DEIR is about a project that is "primarily vehicle-centered rather than human-centered." https://theconversation.com/ever-larger-cars-and-trucks-are-causing-a-safety-crisis-on-us-street s-heres-how-communities-can-fight-back-206382

The project increases greenhouse gasses, vehicle miles traveled, and dirty air quality, all which should be reduced according to the California Air Resource Board 2022 Scoping Plan under SB32. The DEIR says VMT cannot be mitigated to a less than significant level for air quality, vehicle miles traveled, and greenhouse gasses despite the feasible means of doing so that we provided.

Response HH.16: The Draft EIR does not say VMT cannot be mitigated to a less than significant level. As discussed in Section 3.17 Transportation under Impact TRN-2 of the Draft EIR (pages 178-180), the project, with implementation of mitigation measures MM TRN-2.1, would reduce VMT to 15 percent below the Countywide and Regionwide average and result in a less than significant VMT impact. The Draft EIR

also concluded that air quality and greenhouse gas emissions impacts would be less than significant with mitigation measures incorporated.

Comment HH.17: 3.10 Hydrology and water quality

The general plan provision RME-9 on page 114 to reduce stormwater impact from transit proximity is also wrong. First of all the DEIR only analyzes Parcel A and B. Even at the wrong reduced value it finds a significant impact from increased VMT. Second, the DEIR shows no improvement in transit use. And third the project is filling the stormwater mitigations sites like the community garden with hardscape, roads to traverse the project, and grass whose compacted soil increases runoff. To decrease runoff the project should be feasibly increasing vegetation cover by expanding the size of the garden and doubling the density near Serramonte as we explained in our letter to the planning commission. The EIR should be redone to correctly analyze the impact of runoff and dangers to the community in an era of increased atmospheric river runoff as Congressman Kevin Mullin says here from paving over the garden and increasing roads through the project.

Response HH.17: Please refer to Response HH.5: above regarding the Draft EIR's approach in evaluating buildout of the project.

The proposed project would implement mitigation measure MM TRN-3.1, which requires the project to implement a TDM plan to increase transit use and alternative modes of transit by project residents.

As discussed in Section 3.10 Hydrology and Water Quality under Impact HYD-1 of the Draft EIR (pages 117-118), the project would provide a large retention basin on Parcel B to capture stormwater from the project site. This retention basin would ensure that stormwater discharge from the project site, at full buildout during a 10-year storm event, would match pre-construction conditions and not increase stormwater runoff from the project site. Like all new development in the Bay Area, the project is subject to the requirements of the Municipal Regional Permit provisions governing construction and post-construction water quality and stormwater management, as discussed in Draft EIR Section 3.10 (pages 112-121), which serve to reduce the project's impact to hydrology and water quality to less than significant levels.

Comment HH.18: Section 3.11.1 Land Use
Preserving Public Uses Such as Community Gardens and Parks

The DEIR does not look at the losses to the community from privatizing public space. JUHSD owns the 22-acre project site which is public. The project looks to privatize recreational amenities that support health and wellness leaving low income residents in unhealthy situations without access to public space. It currently includes a well-used almost two acre community garden and orchard that improves air quality, increases access to fresh food, improves food security, improves dietary habits

through education, increases fruit and vegetable intake, increases physical activity through garden maintenance activities, reduces the risk of obesity and obesity-related diseases, improves mental health, promotes relaxation, provides needed biodiversity, includes hundreds of plant species including native plants, provides wildlife habitat, includes trees and shrubs of different densities and heights giving birds a places of retreat and safety, includes a number of redwood trees and fruit trees, the garden includes a seasonal wetland, reduces erosion from runoff, provides natural flood control, improves water quality and serves as a vital component of effective adaptation and resilience to climate change. Children's toys within the garden point to widespread community use and the functioning of the garden like a park. All the public benefits will be lost with the project as currently conceived.

Not keeping public resource uses feasible results in significant equity issues such as nature-deficit disorder which contributes to a diminished use of the senses, attention difficulties, conditions of obesity, and higher rates of emotional and physical illnesses. Research also suggests that the nature-deficit weakens ecological literacy and stewardship of the natural world, resulting in apathy in the face of climate change disasters such as wildfires, sea level rise, and extreme heat which Daly City needs to counter. Accordingly, we support increasing community gardening opportunities on public lands in Daly City. Preserving public uses such as community gardens and parks serves public needs, safety, and recreation. The DEIR is deficient in not looking at the significant harms from the loss of public lands to privatization that could have been feasibly preserved and should be redone.

> **Response HH.18:** Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation. Public agencies regularly dispose of surplus public property to private entities for development. The conversion of public lands to private leases is addressed through the CEQA process by evaluating and disclosing the environmental impacts (e.g. air quality, noise, water usage, cultural resources, etc.) that would result from the proposed new use, however, the fact that a project involves a public property being conveyed to, and developed by, a private use is not in and of itself an environmental impact, and, therefore, is not discussed in the Draft EIR.

Comment HH.19: Section 3.11.2 Land Use

Impact LU-2: The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant Impact)

Section 3.11.2 states that the project would not conflict with any land use plan, policy or regulation. The report states (page 124) "The proposed project would comply with the City's Inclusionary Housing Ordinance (Chapter 17.47 of the City's Municipal Code), which requires 10 percent of rental units to be low-income units." The report states that the Daly City Inclusionary Housing Ordinance is intended to address negative environmental impacts, by requiring construction of units for very low and low income households. Failure to follow the ordinance would have the

following negative environmental impacts "(1) housing will have to built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the workers they need." Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers.

In California, cities must develop plans to meet Residential Housing Needs Allocation (RHNA) plans for the community. In the Daly City Housing Element submitted in June 2023, during the period 2023-2031, Daly City is required to plan for 4838 units of which 1336 are very low income (to included 50 percent extremely low income), and an additional 769 are to be low income, and 762 are moderate income. According to the DEIR, the SDR project will provide only 10 percent "affordable" units (i.e. very low, low and moderate income), approximately 120 units of the approximately 1235 units planned for this project. None of the units are included in Plot B, which is the only part of the project specifically addressed in the DEIR.

The Daily City Inclusionary Housing ordinance requires that low and very low income units be constructed at the same time as other units, and be physically distributed throughout the development. This apparent non-compliance with City law was pointed out in the attached November 15 2021 memorandum from the City's Director of Economic and Community Development, Housing and Community Development Supervisor, and Housing Coordinator.

As pointed out in the attached August 21 letter from Grassetti Environmental Consulting, this project will also make it extremely difficult for Daly City to achieve the RHNA allocation of low and very low income housing. The DEIR should be revised to reflect that this project is not in compliance with current land use policy and law.

Response HH.19: Please refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above. In addition, the excerpted Draft EIR text in the comment notes the project would provide at least 10 percent affordable housing. Since publication of the DEIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment HH.20: 3.13 Noise

Shasta High School was not included in the table 3.13-6 on Noise Levels for Monthly test of the Emergency Generators.

Response HH.20: The receptors listed in Table 3.13-6 were chosen to provide a range of distances from the proposed emergency generators. Shasta High School is directly south of Parcel C, which was not assumed to have an emergency generator. The school is, however, approximately 100 feet south of Parcel D, which would fall within the ranges identified in the table. Moreover, receptors of the apartment

complexes, located directly south of Parcels E and F (and thus situated similarly as the high school students), were considered in evaluating noise impacts, and no significant noise impacts were identified. For informational purposes, impacts were even evaluated on project users, some of whom would be located as close as 60 feet to a generator and, even in these circumstances, no significant impacts were identified. Thus, noise impacts to the high school are accounted for. The Draft EIR concluded that emergency generator testing would not exceed ambient noise levels at any nearby sensitive receptors; therefore, the impact would be less than significant (see page 143 of the Draft EIR).

Comment HH.21: Operational Noise: Noise Impact Shasta High School pg 135 and Construction Noise pg 135

As stated: this type of construction equipment could generate noise ranging from 70 to 90 dBA at a distance of 50 feet.

Table 3.13-4 indicates that the South School (Shasta) is 290 ft from Parcel C/D. Parcel C is next to Shasta so not clear on what is the actual distance from noise generating construction equipment to receptors at Shasta, but some portions of the school may be closer than 290 feet. Since construction is planned M-F 8:00 to 5:00 weekdays, which are also scheduled school hours , more information should be specifically provided for Shasta High School on noise impact. Current impact is projected as 77 dBA during demolition and grading.

Excessive ambient noise levels interfere with classroom communication and learning. The American National Standards Institute recommends that ambient noise in a "core learning space" not exceed 35 dBA (not including noise generated by classroom activities). Insufficient information is provided regarding the outdoor-indoor transmission characteristics of the school building, but projected source noise levels indicate that the school will be significantly impacted. Mitigation measures providing 5 dBA reduction, presumably at the source, do not ensure that noise levels are maintained below recommended levels at the school. Given the long time-line for construction at the site. The EIR does not provide a sufficient analysis of noise impacts, and there is no assurance that the mitigation measures will produce sufficient reduction in noise at the school.

No mitigation measures on construction noise references Shasta High School. Pg 140-141.

Response HH.21: The distances stated in Table 3.13-4 are measured from the center of each parcel to the nearest sensitive receptor. As discussed in Section 3.13 Noise under Impact NOI-1 of the Draft EIR (page 140), the threshold for noise impacts during construction is 90 dBA L_{eq} at residential land uses (which threshold is also used for classrooms) or 100 dBA L_{eq} at commercial land uses surrounding the project site. These thresholds and modeling from the center of the parcels are based on the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual. As shown in Table 3.13-4, noise levels would not exceed these thresholds;

however, the project would still be required to implement mitigation measure MM NOI-1.1 to further reduce construction noise. For these reasons, the Draft EIR concluded that the project would not result in significant construction noise impacts. For informational purposes, additional noise modeling was done to estimate noise levels at Shasta High School for the particular periods when construction equipment would be used at the southern property line of Parcel C, representing the most intense noise exposure for the school. Three phases of construction were modeled; grading/excavation, building exterior, and building interior. Construction noise levels were calculated utilizing the FTA's General Construction Noise Assessment method in which the two noisiest pieces of construction equipment per phase were assumed to operate immediately adjacent to Shasta High School. The FTA has set a General Assessment Daytime Construction noise criterion of 90 dBA $L_{eq\ (1\text{-}hr)}$ for residential land-use, which is an appropriate threshold to apply to classroom activities. As shown in the table below, construction noise from equipment located 30 feet from Shasta High School would not exceed the 90 dBA $L_{eq\ (1\text{-}hr)}$ threshold. While the mitigation measures outlined in MM NOI-1.1 would reduce construction noise impacts to a less than significant level, an additional mitigation measure to construct a temporary noise barrier between Parcel C and Shasta High School was added to further reduce noise levels (please refer to Section 6.0 Draft EIR Text Revisions).

Phase	Construction Equipment	South Shasta High School (30 feet)
		$L_{eq(1\text{-}hr)}$
Grading/Excavation	Grader Dozer	87
Building - Exterior	Forklift Backhoe	81
Building - Interior	Air Compressor (2)	81

The American National Standards Institute's 35 dBA recommendation for schools is intended to assist schools in designing new, and renovating existing, class rooms. In this 35 dBA recommendation, background noise refers to transportation noise such as aircraft, road vehicles, and trains, HVAC systems and other building services and utilities operating simultaneously, and plumbing equipment operating at their nosiest conditions. It does not apply to temporary construction noise; therefore, it was appropriately not used as a threshold in the Draft EIR for evaluation of the effects of construction noise.

Comment HH.22: 3.14 Population and Housing

The Daly City Community Garden Alliance agrees with the NAACP DEIR letter.

Redlining makes it likely that there will be very few African Americans who will be able to afford to rent in the SDR. By limiting the affordable housing component to only 10%, and keeping the majority of the project market rate, this project ensures that historical inequities will be unaddressed in changing segregations legacies of redlining as required by the housing element and general plan. The project by preventing more diversity through affordability entrenches the racism that Donald Trump has been dog whistling through our contemporary politics and enters it in concrete. It's ironic that the era of redlining started in Daly City in Westlake as Richrard Rothstein documents in Color Of Law (pages 73-90) and this project casts redlining into concrete by the JUHSD by not even meeting the RHNA that Sierra Club outlined in its letter to Daly City dated February 17th 2022. The letter also outlines a solution to increase affordability in line with the RHNA failures and feasibly mass taller buildings near Serramonte to feasibly remove cost burdens to residents from transportation. Additional cost burdens from utilities can be reduced by feasibly making the project a microgrid of batteries and solar panels including on a taller south and west facing vertical surface as Sierra Club outlined in its letter to the planning commission dated August 3rd 2021. Through pricing and 90% market rate housing SDR ensures that racial segregation remains the de facto developmental model in Daly City. The EIR should be corrected to integrate housing as recommended by the general plan and housing element.

Response HH.22: Economic and socioeconomic topics are not considered CEQA issues; therefore, the Draft EIR does not include discussion of them. In addition, since publication of the Draft EIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment HH.23: 3.16 Recreation
Demonstration Garden 2.2.1.1
1) The Garden has been maintained for +20 years by public community members and not JUHSD. The land is surplus public land, not private property. It is a community garden that is located on the perimeter of the property with a hillside of full grown trees with a water inlet. Serramonte HS was closed 42 years ago. The Community Garden Alliance, Sierra Club, NAACP, Gay Shame, Pacifica Social Justice groups have clearly stated at all public meetings with JUHSD and the City of Daly City that the public has been in control of the Garden to grow vegetables, fruits and herbs. JUHSD has only disputed that the land was on school property and "provides limited access for members of the public" 2.2.1.1 pg 20.
The Impact is Significant (total destruction) and should be reviewed as a separate alternative to have no construction and remain as a public garden.

Response HH.23: Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation above.

Comment HH.24: Existing Conditions
The Draft EIR does not recognize that current Recreation is provided on site with the Gymnasium for 2 major established groups. Year round basketball games are played at the gymnasium by Hundreds of youth and adults for the CYO and Homenetmen.

Although it is stated pg 165 “that the project proposes to pay in-lieu fees to offset recreational demand for parkland not provided by the proposed project” –the loss to the community of the gymnasium has not been factored in.

This is a Significant impact to the Community that has not been addressed. From the Executive Board of Homenetmen one of two major renters of the gymnasium: Homenetmen is a non-profit organization and has been renting out the Serramonte Del Rey gym since 1997. The usage of the gym is for basketball practices for our 10-12 teams along with 2 other organizations from PBL and BullDawgs. The gym is also used for the OYAA Greek League. Hundreds of community members take part in basketball games and practices throughout the year. We have at least 30-40 games excluding practices. The facility is also used for Youth Scout purposes. It has been quite difficult to find and rent a gym and offices as a new home for our organization.

Response HH.24: Please refer to Master Response 6: Recreation above.

Comment HH.25: Pg. 164. “The nearest park(s) to the project site are Gellert Park located approximately 800 feet southeast of the project site.” That designation is not correct as Gellert Park is not a Park. It has a library and ballfields but it is not a park. It cannot be ADA accessed until the corner of the clubhouse and tennis courts or .8 mile or 4,224 feet.

Access is due to no stairs from the corner of Hickey and Callan and could be a recommendation as part of the Development agreement.

Response HH.25: The statement that Gellert Park is not in fact a park is without basis. Gellert Park is a City owned and maintained park listed in the City’s Parks and Open Space Master Plan.

As discussed in Section 2.2.2.1 of the Draft EIR (page 11), the City and applicant are in discussions about additional off-site improvements, including improved access to Gellert Park. However, as the commentor notes, Gellert Park currently has a designated access point for ADA access. The location of Gellert Park’s ADA accessible entrance does not alter or impact the Draft EIR’s analysis of the project’s impact on recreation.

Comment HH.26: Parcel B Open “Public” Space portion of Development Project—not visible or easily accessible to public

The Parcel B area includes what little green space is being proposed for the public as indicated as Overlook Park (large grass area and playground). Figure 2.2-8

2.2.2.2 Open Space and Landscaping
There is no public access to the park unless you walk the recreational trail around the frontage of Serramonte Blvd and the 73.5 foot high Parcel B building. It is not visible to the public.

2.2.2 Does not indicate any public parking spaces other than reserved for retail customers and leasing, with and the remainder reserved for residential parking. No ADA parking is indicated for either the public park or playground. By isolating this park within the development, lack of access from Callan Blvd and lack of public parking, creates a privatized, not public space, as is claimed in the DEIR. or public parking this is not public open space but privatizing for the development residents. This does not meet public space or access guidelines.

Response HH.26: The proposed park on Parcel B would be built in accordance with City standards. While the park would not, due to slope, have direct visibility from Serramonte Boulevard, the park would have visibility and public access via sidewalks and recreational trails . It is noted the existing demonstration garden is not visible from Serramonte Boulevard, yet the community is aware of its existence. Parking on the project site and for Parcel B will be provided in accordance with City Code for a project of this type.

Comment HH.27: Transportation

Market rate housing doesn't support transit.
The DEIR claims that the project will function as a Transit Oriented Development (TOD) . According to University of California Davis for National Center for Sustainable Transport (NCST) TOD is meant to change transit patterns to reduce air quality and greenhouse gasses impacts on society.

Research indicates that compact, mixed-use, mixed-income development located near transit can serve to reduce driving and associated harmful emissions, meaning TOD could help support state sustainability goals. (page iii). Many localities in California also support TOD goals, for reasons that include revitalization of downtown areas, mobility and accessibility improvements for residents, and provision of workforce housing. Now is a critical time to consider which planning and policy "packages" can be most effective in inducing TOD, and this research project helps address that question.

There are a number of factors that lead to ineffective TOD by the project. The DEIR admits ineffective TOD in a circular fashion, it says:

Implementation of the proposed project (including the Parcel A development project) would introduce 3,403 net new residents to the project site in comparison with planned development levels (refer to the discussion in Section 3.14.2.1 under Impact POP-1) and would generate approximately 170 new transit users.

The footnote 84 explains that the transit usage expected is no more than the region produces with its standard, i.e. non TOD, development pattern:

84 Assumes five percent of residents use public transit. Source: U.S. Census Bureau. Commuting by Public Transportation in the United States: 2019. April 2021.

There are a number of feasible reasons why the project fails which we explained in various comment letters on the project to the project proponents.

The apartments proposed by Serramonte Del Rey are going to rent for an average of $3000/- per month according to Zillow. That is $36,000 per year. According to the 30 percent rule the income of the renter's will exceed $120,000/-. People in this income bracket, renting from this project, based on the current subdivision map, will not use transit in general and buses in particular. See American Public Transportation Association report on who uses transit page 36 and 37. Page 37 on transit use by household income shows significantly declining transit use by income. Page 36 of use by mode shows higher income users prefer rail to bus.

Note that lower income people tend to use transit but they only make up 10% of this project. Therefore 90% of this project will be contributing to public problems of air, water and GHG pollution, congestion, and increased VMT by driving instead of taking transit. These impacts are the opposite of what is required from public goals under SB32, SB 375 (40% reduction against a baseline of 1990 levels by 2030) and SB743 (using Vehicle Miles Traveled (VMT) analysis instead of Level Of Service to gauge lifetime impacts from the project due to transportation.)

> **Response HH.27:** It is incorrect to state residents of market rate housing do not use transit. The Draft EIR conservatively relies on the estimate that five percent of residents would regularly rely on transit, as reported by the U.S. Census Bureau. In addition, since publication of the Draft EIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment HH.28: This DEIR fails to acknowledge the long term decline in transit on the project because of the project's auto oriented development patterns. The Mercury News noted in 2010 that Samtrans would enact service cuts because of deficits caused by lower ridership. The service cuts were coming on top of service cuts enacted in 2009. San Mateo Daily Journal reported additional cuts in 2017. This year transit operators in the Bay Area are facing a huge fiscal cliff and additional service cuts.

The current development pattern that Serramonte Del Rey is utilizing is driving transit out of business.

> **Response HH.28:** As discussed under Impact TRN-1 in Section 3.17 Transportation of the Draft EIR (pages 176-177), the project would improve access to transit in the project area and would not conflict with a program, plan, ordinance or policy regarding transit services. Future residents can be expected to use transit when their destination can be readily accessed using transit, such as utilizing nearby Colma BART for work trips to major employment centers such as Downtown San Francisco.

Comment HH.29: According to CCAG, slide 6, we must reduce VMT by shifting to other modes to meet CA goals in SB375 and SB743. According to RMI we must reduce VMT by 20% before the end of the decade to meet Paris. This subdivision layout should be returned because it's designed to fail.

Similar project layouts in San Mateo have not delivered the promised transit usage- See for example Bay Meadows in City of San Mateo which not only resulted in declining transit use but also contributed to increasing driving, leading to the expansion of 101 and the adjacent slip lanes because “when you continue to load the system, it starts to break down.”

Impacts can be avoided if possible mitigations are adopted, within the subdivision map, also mentioned in our letter to planning commission:

A. the buildings should be massed closer to the street, without parking and (if possible) on a U bus travel loop to reduce time needed to catch a bus.
B. The U street should be for the Serramonte bus, a shuttle to major stops like BART and school, car and bike share, employer shuttles, and delivery to shorten trip times.
C. Parking allowed should be unbundled and located in a park once and walk location to encourage people not to own cars and create a safer walking environment that would decrease vehicle miles traveled. The parking can be further reduced like the City of Austin by replacing 20 spots with one car share spot.

Response HH.29: Please refer to Response HH.13: above regarding VMT reduction.

Comment HH.30: Samtrans bus use has been low compared to other agencies and has been steadily decreasing. See Metropolitan Transportation Agency report titled “How much are Bay Area residents relying on Transit” chart titled “Historical trend for daily transit ridership by operator” which shows Samtrans as poorly used and slightly declining for two decades. Overall transit use has declined by 11% in the same period.

Displacement also impacts transit use as the UCLA study says, primarily bus users, who are low income, are displaced for rail users. Long term transit use declines. Thus SamTrans bus service continues its long term decline with rising rents which in turn increases driving.

Worse, low income people who used to take the bus are part of an outmigration to far away places like Modesto where they commute from in older cars increasing VMT, bad AQ, and adding to the congestion which will be produced by this project.

The project proponent and Brookwood have not submitted any case studies to show why displacement and declining transit will not continue and the EIR has ignored this fact in trumpeting the dataless and unverified narrative of TOD.

These substantial impacts to dirty air, greenhouse gas increase, transit sustainability and displacement can be avoided with feasible measures that we recommend in our letter to the planning commission such as:

A. Increasing the total of affordable housing in the project to reduce displacement and increase transit use.

B. There should be no parking or motor vehicles allowed in the development to increase the number of users committed to transit. This is an ideal location to eliminate parking because there are no adjacent streets for spillover. It will also significantly lower the cost of the construction and will result in lower rents and perhaps more units. San Francisco, Oakland, and other cities do projects without parking if located on transit and bike routes. No parking within the development will increase transit use because automobiles ownership decreases transit use. California Transit Association reported that transit use declined as auto ownership increased caused by "the shift of lower-income riders moving into owned automobiles" primarily due to displacement.
C. Lower overall rents due to no parking will increase people likely to take transit.
D. Increasing usefulness of transit to users at the site by reducing trip time via a U bus street and shuttles will make transit more viable.

Response HH.30: Please refer to Response HH.28: above regarding declining transit use. In addition, since publication of the Draft EIR, it has been clarified the project would provide 20 percent affordable units. See Section 5.0 Draft EIR Text Revisions below.

Comment HH.31: 3. Prior to the Covid19 Pandemic, bicycle, walking and transit use had not increased in Daly City, see Transportation, while drive alone remained the dominant commute mode. The DEIR is wrong to assume that "proximity to transit" and "pedestrian and bicycle facilities" will not waste energy (Page 83). The conclusion of Impact EN-1 is wrong and should be corrected with a redone EIR to avoid conflict with the CARB Scoping Plan of 2022, SB 375 and Plan Bay Area 2050 (page 94) to reduce VMT (significant impact from the study of only Parcel A and B) and GHG (improperly calculated by not considering the entire project as we show above). In addition the inability to reduce air pollution by not reducing VMT for the whole project (not studied in this EIR) will conflict with CEQA Air Quality Guidelines since the numbers on page 93 should be based on SB32 and not on AB32, another serious deficiency which should be corrected in a redone EIR. When we checked with Michael he said that the DEIR would comply with the CARB 2022 Scoping Plan which is based on SB32 (to meet the more aggressive target of 40 percent below 1990 levels by 2030- page 1). The DEIR does none of the recommendations on page 1 and 2 to decrease reliance on cars, install renewables like solar and batteries, electrifying everything, and aggressively reducing fossil fuel use.

Response HH.31: Please refer to Response HH.5: above regarding evaluating buildout of the project, Response HH.11: regarding energy use, and Response HH.13: regarding VMT reduction. Project GHG emissions were calculated and per capita emissions would be well below the threshold of significance derived from the state's SB 32 GHG reduction target, as presented in Draft EIR Table 3.8-1.

Comment HH.32: The DEIR assumes no increased use of transit (page 176) since only 170 of 3403 residents or 5% will use transit which is a substantial decrease of the pre covid transit mode share. That means that car friendly patterns of VMT increase, air pollution increase, and greenhouse gas

increase, will continue in direct contradiction to the CARB 2022 Scoping Plan as this study from UC Davis says is likely. The DEIR is wrong to assume that current transit usage will persist. Instead they are more likely to continue declining, aligning with regional plans like SB375 and that covid patterns will persist leading to further declines in transit unless the CARB recommendations are followed. By not following our recommendations to mass the project closer to Serramonte in a taller more cohesive project not segregated by income the project proponents are ensuring that air quality will deteriorate, green house games will increase, and transit other social goods will fail. Other proven strategies mentioned in this UCLA paper, to increase transit use by pricing driving (unbundled parking, road charges, priced parking) and making transit free do not exist in Daly City thus requiring a redone EIR.

This paper which we mentioned earlier, says that transit is declining because transit users are being displaced by rising property and rental prices to cheaper locations like Tracy where transit is so bad that they have to buy a car. Rising car ownership and gentrification/displacement is leading to the decline in transit. The DEIR does not acknowledge the impact of increased rents increasing car ownership from its 90% new market rate housing on the city and region thus requiring a redone EIR to correct the transportation analysis by looking at current conditions mentioned earlier and studying the entire project as required by CEQA to inform policymakers.

The project design has ignored feasible solutions that we provided to the planning commission on this project and not studied the entire project as required by CEQA to properly inform policy makers. In doing so the DEIR provides unsubstantiated reliance on TDM to ignore major health impacts from dirty air due to declining transit and the development of the project with upper income residences that do not take transit.

> **Response HH.32:** Please refer to Response HH.5: regarding evaluating buildout of the project, Response HH.15: regarding implementation of a TDM plan, and Response HH.28: regarding declining transit use. The project would not displace any housing from the site, nor is there evidence provided that the project, by providing market-rate units for 80 percent of the development and 20 percent affordable, would lead to an increase in rents generally within Daly City or the region. Rents and housing prices are high in the region due to a lack of housing supply generally (both market rate and affordable), and increasing the supply of housing for all income levels would help alleviate housing prices, not exacerbate them.

Comment HH.33: Transit DEIR page 164
Safety of Shasta Students walking to/from Serramonte Blvd
Policy CE-16 Daly City 2030 General Plan
Where are the “Safe Routes to School” action points for Shasta HS? No mention is made on the walk safety for students at Shasta High School maneuvering through the development during construction to the bus stops at St Francis and Serramonte Blvd. (Parcel F which is the current walk route of the students to the front of Parcel A will be a crossing zone of soil movement and staging equipment).

The recreational perimeter trail should be built all inclusive from Parcel B to Parcel C at the start of development of Parcel B to ensure a "Safe Route To School" to/from the bus stop.

Response HH.33: As discussed in Section 3.17 Transportation under Impact TRN-3 of the Draft EIR (pages 180-181), the project would be required to implement mitigation measure MM TRN-3.1, which requires preparation a Construction Traffic Management Plan. Implementation of this mitigation measures would ensure pedestrians and bicyclists, including Shasta High School students, would have safe access to and around the project site during project construction.

Comment HH.34: 3.18 Tribal Cultural Resources

Sacred Space and access to Native Foods and Medicines

Native Americans have been violently dispossessed and exterminated from the land (A Paradise Of Blood by Howard T. Weir; The Other Slavery by Andres Resendez) Through the boarding schools our culture has sought to displace them from their origin stories, diets, and healthy living conditions (An Indigenous People's History Of The United States by Roxanne Dunbar Ortiz.) The resultant scattered survivors have had their health traumatized by homelessness, poverty, boarding schools, and state sanctioned violence in programs of environmental injustice (As Long As Grass Grows by Dina Gilio-Whitaker.) But the peoples have gathered in cities like Daly City and managed to propagate their culture from seeds and medicines to sacred places (See petition started by Debbie Santiago.) The garden functioned as a safe space where the diaspora could gather, celebrate their survival, tell stories, show Americans that indigenous still live off the land, and in celebrating the changing of the seasons, and harvesting food and medicines in sustainable ways, interact with the great spirits.

What's especially galling is that the project is taking place on the unceded home land of the Ramaytush Ohlone. Once more this project maliciously raises the ugly head of settler colonialists to violently disrupt the indigenous relationship to the land.

- The project, in paving over the garden, looks to displace and degrade the assembled diaspora, and eliminate their presence from the landscape, that provided the tribes with sustenance in food medicine and shelter from the pollution.
- The DEIR is deficient in not preserving the garden as a cultural resource of native practitioners, who lack access to sacred spaces, as public spaces are privatized, and should be redone.
- The DEIR is also deficient in not pursuing a feasible strategy to mass the project near Serramonte and achieve multiple public policy goals mentioned earlier in this document and preserving the garden for community health.

From the Sierra Club's NOP Letter on June 7

5a. Religious, cultural, and spiritual significance of the area to Tribes be ascertained prior to the EIR for the purpose of protecting, or mitigating impacts to, cultural places by contacting the relevant groups.

5b. As mentioned earlier Indigenous people within the garden community farm native plants for herbal and spiritual needs, a use that should be preserved.

Debbie Santiago letter to the City Council on June 6, 2021, It's attached to the Draft EIR:

The Jefferson Union High School only wants us to see the new grassland of where they want to put generic plants. We have agreed to look at the area. But lots of the plants, fruit and veggies plants will not survive the transferring and replanting. Especially when their employees are not giving the love, the attention and not a lot of water to keep surviving. We still need to save the Bog (swamp area) Coffee Tree, indigenous plants, herbs and all the different fruits and vegetables. With all these wonderful qualities, these plants and herbs bring in the dears, the butterflies, the bumblebees and other Bees to make Honey and Hummingbirds that help cultivate each plant to survive.

> **Response HH.34:** Please refer to Response DD.3: through Response DD.9:, regarding special-status species, and Master Response 7: Tribal Cultural Resources above.

Comment HH.35: Historic Resources: Impact Discussion DEIR pg 75 confirms location:

"However, based on the site's proximity to a historic freshwater source and the historic occupation of Daly City and the project site by the Ohlone/Costanoan people, the Cultural Resources Study identified a moderate sensitivity for subsurface archaeological resources to be encountered."

The Garden has been identified by community members as a meeting spot for the Ramaytush Ohlone tribe members to have spiritual meetings. JUHSD recognized these members and had meetings to discuss an alternative spot with the representative but provided no contact information to the City or consultants to contact them directly. The Draft EIR is deficient to not contact known sources directly to establish Historical Resource information for which the DEIR should be redone.

> **Response HH.35:** Please refer to Master Response 7: Tribal Cultural Resources above.

Comment HH.36: 3.19 Utilities and Service Systems

Emergency Generators DEIR pg 142 Parcel C Omissions
As stated:" Emergency Generators are proposed to be located on Parcels B, D, E and F."
Why is Parcel C –which the Developer has called the "affordable" Building in discussions with prospective builders not going to get a generator? This is the same building that the Head Start building is planned for. Why is this building being excluded? The Sierra Club letter to the Planning Commission showed that all the buildings could be feasibly protected from power outages by being

designed as microgrids for which there is considerable money available in the Inflation Reduction Act and through the state's SGIP program. The DEIR is deficient in discriminately not feasibly protecting low income tenants from the effect of power outages such as the Public Safety Power Shutdowns.

Response HH.36: Please refer to Response GG.13: above.

Comment HH.37: Please attached the following 20 documents, petition, photos and videos as our additional comments on the DEIR:

1. July 21, 2023 - Community Garden Alliance NOP Comment Letter
2. Feb 7, 2022 - Community Garden Alliance Letter
3. Daly City Housing Element
4. June 7, 2021 - Daly City Planning Division Notice of Preparation Letter (NOP)
5. August 3, 2021 - Daly City Planning Commission Letter
6. August 13, 2021 - San Mateo County Board of Supervisors / David Canepa Letter
7. September 8, 2021 - Daly City Council Letter
8. February 17, 2022 - Daly City Council Letter
9. March 9, 2022 - Daly City Council Letter
10. Sept 7, 2023 - Draft EIR Letter
11. Petition to Save Daly City's Only Community Garden
12. Serramonte Del Rey Precise Plan
13. October 4, 2021 - JUHSD Real Property Advisory Committee 7-11 Report
14. 2018 City of Daly City Inclusionary Housing Ordinance
15. May 2023 - City of Daly City Housing Element 2023-2031
16. April 25, 2022 - JUHSD RFP FAQ for BMR Developer: Parcel C
17. State and Federal Endangered Species List
18. Wetland & Seasonal Creek Photos and Videos
19. Historic Photos
20. Garden Photos

Please let us know if you have any questions regarding our comments.

Response HH.37: Please refer to Appendix B Draft EIR Comment Letter Attachments for full printouts. The additional documents provided do not raise specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

II. Nancy Lacsamana (dated September 8, 2023)

Comment II.1: Recreation for the Serramonte Del Rey project as well as the need to address inaccuracies shown in the existing conditions 3.16.1.2.

Location:

The Project is bordered by housing on 3 sides and a cemetery on the East side. The DEIR has failed to convey that not only has the current location lost Recreation with the destruction of the garden but also the closure of the Gymnasium. The proposed Precise Plan has not noted the loss in Daly City recreation for tournament and community recreation for hundreds of athletes of various ages.

Response II.1: Please refer to Master Response 6: Recreation above.

Comment II.2: 3.16 Recreation
3.16.1.2 Existing Conditions
Omissions and Inaccuracies

- The full-size-year-round gymnasium is not mentioned.
- Gellert Park access is over 0.8 mile from the project vs 800 feet as stated in the dEIR. The physical location may be 800 feet but there is a steep hillside at the corner of Hickey and Callan. Gellert has a library, baseball fields, community room, tennis park. Gellert Park is not a park.
- The Garden is a publicly accessible community garden and is mislabeled as a Demonstration Garden. It provides recognized recreation benefits that are well documented. The issues and value of the Garden has been covered by the following letters from NAACP, Community Garden Alliance, Pacifica Social Justice, Sierra Club and community members.

Response II.2: Please refer to Master Response 1: Demonstration Garden and Master Response 6: Recreation. Please refer to Response HH.25: regarding Gellert Park.

Comment II.3: Gymnasium current ramifications of loss
The gymnasium was the home to over 500 community members especially children in basketball tournaments, practices, physical and scout activities. I was in this gym as a parent at least 5 times while my son was on a public middle school basketball team and there were over 50 people at each event. Practices have been held during the week and games every weekend.
The Gymnasium was leased out* to two different large organizations who have a well-known and respected reputation in youth sports and activities.

- CYO ---Catholic Youth Organization that allows public and private school basketball programs.
- Homenetmen --a long established Armenian community group who has for 24 years at this location for basketball and scout programs.

*Please find attached the following email from Tina confirming the lease to these 2 major organizations. Please print and include into the comments.

Please find attached the following email from Vahan Derounian and the frustration with having been at this location for over 24 years and having to relocate the recreational facility with no assistance or options from the JUHSD. Please print and include into the comments.

It is undeniable that the planned destruction of the gym has impacted basketball programs and access to physical recreation for hundreds of students and it was not included in the DEIR.

Response II.3: Please refer to Master Response 6: Recreation above.

Comment II.4: Project Recreation need go forward
It is very clear that the 3,403 new residents are going to need recreation in the project and the Serramonte Del Rey project will not provide these residents adequate recreation.

3.16.2.1 Project Impacts
The Parcel B Development project includes a privately owned, publicly accessible park, a recreational trail, and a public retail plaza, totaling approximately 0.8 acre, which would partially off-set demand on nearby recreational facilities. (Project will pay difference in lieu fees.)

Overlook Park's location cannot be seen from Serramonte Blvd
The publicly accessible park or Overlook Park cannot be seen or accessed directly by the public without walking the Recreational Trail. Parcel B side bordering Callan is on a steep hillside bordered with mature trees. From the West view, Parcel B Building at 75 Feet tall and will obstruct any downhill view of the park. There are no shown ADA parking or public parking spots other than for retail. Although this does create open space parkland it is most probably going to be used by the residents of the Parcel B and future building of ParcelC-F and not the public outside of the development.

Response II.4: Please refer to Response HH.26: above.

Comment II.5: 3.16.2.2 Cumulative Impacts
IMPACT REC-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant recreation impact.

In Summary, the DEIR does not consider the impact of the loss of the Gymnasium and Garden, and the isolation of the Overlook Park from public view. The DEIR has failed to adequately convey these even more significant negative impacts in Recreation for this project.

Response II.5: A cumulative impacts refers to the combined effects of multiple projects affecting the same resource or causing similar impacts within a defined geography. Here, the comment refers to several alleged impacts of the project, and not cumulative impacts from multiple other projects occurring in the vicinity of the project. Please refer to Master Response 6: Recreation above.

JJ. Erick Campbell (received September 8, 2023)

Comment JJ.1: I have been a resident at Serramonte Ridge for over 8 years and counting. I am also the caretaker of the “garden” at Serramonte Del Rey. I am writing you today express my concern

with the 1 and a half acres located at the far end of the Serramonte Del Rey Campus. Known as the garden. My first concern is what is at stake here! This land is not only a green space, but an urban forest with over 100 native trees including over 25 California coast redwoods not the aptos blues either. Also Douglas fir, buckeyes, madrones, live oaks, white oak, California coffee berries, bay leave, elderberries, Monterey pines, Catalina ironwoods. According to project Green Space of Daly City this City "DC" has only 127 redwoods in its entirety. If that is the case then that would mean this green space has almost 20% of all the redwood trees in the whole city. How can this be to hire a crew to cut down 100 native trees in a city with less than 5% of a urban canopy just to dump their concrete and dirt on it is completely crazy. JUHSD are a bunch of lies as well. JUHSD has been trying to destroy this garden for years now and are for some reason willing to waste millions of our taxpayers money on things like security of the garden over a quarter of a million a year for 24 hours 7 days a week security that just sleeps in their cars and are always rude. One was fired for smoking dope at work in their car. JUHSD has 24 acres of property. They have promised a new garden with double the space, but if that were the case why would they even get rid of this one it doesn't make any sense. Also, before JUHSD built their housing for teachers they cut down 120 trees to build. They promised to replace 90 of them. As of today they have planted 6 cypress and commercial landscaping, not one native plant. This greenspace is also the only filter on the whole campus. It works as a rain garden filtering all the rain water mixing with the sludge of the road. JUHSD has not reached out to the communities about anything. Their one in control was fired from a different school district for taking funds. How she got this job I don't know, but she is not honest. I have had many teachers from the new housing for JUHSD say they love the garden and that they won't let them have plants in the building so they bring their plants here to plant. Why is this so hard for them to get JUHSD to do the right thing. They have wasted so much on the security cameras only to show pictures of coyotes. JUHSD has done nothing but try to make the garden into a bad place. How can corruption exist so freely. Why should this greenspace be wiped out just because these crooks lied and gave away land that is not private property but public land to the blynn corps without any feedback from the public. We are not trying to stop their buildings. Just trying to save this little plot of goodness. Thank you for your time.

> **Response JJ.1:** The existing conditions on the site, including the demonstration garden, have been documented in the Draft EIR, including assessments by professional biologists. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

KK. Nick Occhipinti (dated September 8, 2023)

Comment KK.1: This letter is being provided as public comment/input in reference to the Draft Environmental Impact Report (DEIR) of the proposed and yet-unapproved Serramonte Del Rey Campus Redevelopment Project. This input is based on my experience as a former Board Trustee of the Jefferson Union High School District and lifelong resident of Daly City. As the sole trustee in opposition to this project, given the multitude of its problems and misdirection from its inception, I speak from a perspective both informed by and grounded in direct involvement with reviewing this project since before its conceptualization, and a critical lens of its impact upon our school district

community, public education funding and the larger scope of its engagement of environmental law, housing policy and urban development. An Environmental Impact Report (EIR) should center and elevate the issues relevant to mitigating and eliminating harmful impacts to our environment; this DEIR completely, and intentionally fails to do this. Daly City's current role in navigation of urban development in San Mateo County compels a careful and acutely responsive approach to public policy, particularly with respect to public education, housing and infrastructure, and with a critical engagement of diversity, equity and inclusion in its policymaking. Any EIR under consideration at this level demands a clear professional and legal obligation to provide adequate research for its development, respect and careful attention to detail. It is the purpose of this letter to identify these fundamental and critical areas of need in this project, as well as its implications for future projects of any scale in the City of Daly City, San Mateo County and cities across the Bay Area moving forward.

Accordingly, this project - the largest housing project ever proposed in our city and North San Mateo County, requires due diligence in its evaluation and should not be fast-tracked under the pressure of private interests - which in this case have demonstrated a clear intent to silence the input of local community members, at the expense of one of the lowest-funded public school districts here in the SF Bay Area. Education is a human right, and housing is a human right; our schools are not for sale. I continue to extend my strongest recommendation and advising to public officials and city planning staff that this project, with its many clearly unethical and ambiguously legal and financial issues, be halted and completely redrawn at this point. With that, the public input process for this project and its DEIR should be restarted, with a more transparent, accountable and responsible engagement of public comment and input, and in step with the guidance of local, state and federal public agencies.

As the SF Bay Area begins to reimagine itself at the outset of an endemic stage of a global pandemic, local cities have the responsibility and opportunity to step back and consider the relevant and essential needs of our communities. It is incumbent upon public agencies and the public officials leading the duties of governance to research, reflect and seek consultation from other public institutions, nonprofit agencies and, most importantly, their constituents, the communities that they represent. Every city is different - and Daly City's role in both San Mateo County, as well as the city directly adjacent to San Francisco - requires a departure from the problematic and discriminatory practices and abuses of public policy of the past, glaringly apparent in the development of San Mateo County for generations.
As a new generation of voices, leaders and community here in Daly City and San Mateo County, the test of our leadership will be to see what we are actually willing to do to make a change in how we see our community: is it simply for sale to the highest bidder - or do we value our culture, community and have any vision for our cities that goes beyond what we have seen for years? We should ask ourselves, and each other:

What do we want to see as the future of our city?
What do our students want to see as the future of their schools?
What should our streets look like?

What role can the malls play in public service to our community?
Where are our public murals?
How can we ensure that our public libraries remain open to the public seven days of the week?
How can we open up our brand new, outdoor school athletic fields and theaters to the public for community use in an accessible, organized and responsible way?
How can we build on the strength of our community's cultural diversity and provide spaces to celebrate that throughout the year?
How can we finally begin to acknowledge and honor our Native, Indigenous community here on Ramaytush Ohlone Land in a respectful, substantive and meaningful way?
What is our city and county doing to promote and protect our environment, and in response to climate change?
What will our city look like if we never answer these questions?
What can our city be if we start to actually listen to the voices of our youth, elders, families and community, and engage them in a way that sees them the way we want to see our city?

If we are the change that we want to see in our community and world, then we have to accept that this change means that we have to change the way we do business - and public policy. If that begins anywhere in Daly City, it begins in Serramonte.

Response KK.1: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.2: The Serramonte Del Rey Development Project Draft EIR is littered with flaws throughout its 200+ page draft report. In an honest assessment of its contents, it is actually more questionable than the previously reviewed SDR Precise Plan. It should have included and made adjustments to this plan, based on the multitude of critical public comment provided on public record at live public meetings of the Daly City City Council and the Jefferson Union High School District. Instead, it appears to be a blueprint pushed by luxury developers with little to no regard for providing sufficient affordable housing or reasonable community benefits. It is the responsibility - and stated explicitly in our oath as public officials and employees - of our public agencies to act in the public interest, not the private interest. This DEIR falls painfully short of that. The list of infrastructural, environmental and community-based concerns is long and detailed, and has been voiced and cited on public record over the course of years by community member input - including many local high school students and generations of alumni, a petition of nearly 5,000 community members signing in support to Help Save Daly City's Only Community Garden on Ohlone Land and Territory and several community-based organizations, nonprofit and civil rights agencies, not limited to but including designated representatives of our local Native American / Indigenous community, the Daly City Community Garden Alliance, the Sierra Club Loma Prieta Chapter and the NAACP San Mateo Branch #1068.

Response KK.2: The comment states that the Draft EIR contains flaws, but does not provide examples of the stated flaws, and cites no specific pages or conclusions reached in the Draft EIR. Thus, no further response can be given.

Comment KK.3: An immediate list of concerns that arise from the inception of this development, and continue to remain unaddressed, include:

- Logistics for building 1,235 apartments and creating parking, all on a public school site seem both inappropriate, outsized and completely negligent of the historic and projected environmental impacts facing Daly City and its surrounding area, including: pollution, lack of public green space and open space, extremely limited urban canopy and endangerment of local wildlife and remaining trees protecting the area (Daly City also continues to lack adoption of public policy regarding any substantive Heritage Tree Ordinance or formulated Urban Forest Plan protecting or promoting preservation and positive support of our local environment, as modeled by other cities our size, throughout the Bay Area and state of CA)

Response KK.3: This comment speaks generally to impacts regarding pollution, lack of open space, urban tree canopy, and wildlife, but does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.4: - The net green space and open space numbers listed by the DEIR about this development are incorrect and misleading, given the net loss of green/open spaces resulting from the destruction of Westmoor Park, the office park development that this SDR DEIR is predicated, and effectively directly linked to; the projected net green space and open space should be reassessed and redrawn to include provision for those areas and services lost to these projected developments (preservation and promotion of existing Community Garden at SDR, indoor basketball gym and athletic facilities, space for community organizations and sports leagues, local martial arts programs nonprofit agencies, and auditorium/gallery/event center, etc.)

Response KK.4: JUHSD's adult education and district office project at 123 Edgemont Drive was approved as a separate project by the JUHSD Board of Director's in August 2021 and its recreational impacts were disclosed as part of the environmental review process. Construction of the JUHSD adult education and district office project is not contingent on approval of the proposed project.

Please refer Master Response 6: Recreation above in regard to recreational impacts.

Comment KK.5: - No justifiable need for additional Retail space in what is in fact the largest concentrated retail complex in the SF/San Mateo County Peninsula (Serramonte)

Response KK.5: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.6: - Language in Precise Plan/DEIR projecting "to create a neighborhood" in an existing neighborhood is both grossly misleading, and insulting; Daly City's neighborhood is defined largely by its residential housing and population density, including historically low-income multi-unit apartment buildings located directly across the street from SDR, as well as the new JUHSD

workforce housing, and the Serramonte Ridge apartment development previously built (and currently losing affordable units) already located at Serramonte Del Rey.

Response KK.6: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.7: - Problematic, discriminatory prioritization of luxury/market-rate apartments and extremely limited affordable housing units - which are also planned to be segregated from the market-rate buildings, in a repeated, blatant attempt to appeal a violation of longstanding civil rights law (also cited by the NAACP)

Response KK.7: Please refer to Master Response 2: Regional Housing Needs Allocation and Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.8: - The DEIR for the Serramonte Del Rey Development Project is also still in violation of the city's own housing ordinance, which mandates that affordable housing units be included, and not segregated from the market-rate/luxury housing buildings by isolating them in a separate building; this is a violation of federal, state and even local civil rights / housing law and should not be allowed "exception" for any reason, or aggressive lobbying by private industry and real estate lobbyists

Response KK.8: Please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above.

Comment KK.9: - The DEIR and SDR Development Project altogether neglects addressing the housing crisis at its actual needs: affordable housing and addressing homelessness and the needs of unhoused and low-income community enduring a high cost of living in the Bay Area, extremely high rent, possible eviction and ongoing financial hardship in our current economy.

Response KK.9: Please refer to Master Response 2: Regional Housing Needs Allocation above.

Comment KK.10: - The DEIR is informed by false statements made by JUHSD Board Members on record at live High School District Board meetings, constituting an intentional, concerted effort to misrepresent, isolate, exclude and disregard the contributions of the designated representatives of our local Native / Indigenous community to a public project impacting green space, open space and the environment, the largest of its scale proposed in decades in Daly City and North San Mateo County; no approval of this project's planning has ever been expressed by the Native community involved in any stage of the development the SDR Project and its EIR.

Response KK.10: Please refer to Master Response 7: Tribal Cultural Resources regarding the City's compliance with obligations to consult under AB 52 and SB 18 with tribes culturally affiliated with the project area. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.11: - Lack of good faith communication and collaboration reflected in the current DEIR - requested explicitly on public record, at City Council Meetings as a prerequisite of continued consideration of this SDR Development Project through the EIR process – has defined the pattern of the JUHSD's efforts to fast-track this project; this has included attempts to silence and exclude designated local Native / Indigenous leaders, community member input, and inclusion of critical public feedback, as well as active lobbying by JUHSD members of local public agencies and civil rights organizations to stop submitting letters of public input throughout the EIR process.

Response KK.11: Please refer to Response KK.10: above. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.12: While cities across the state like San Francisco, Oakland, San José and Los Angeles have undertaken initiatives to address the multiple overlapping crises of housing, poverty, unemployment and drugs facing our cities today with more critical and innovative approaches, Daly City and San Mateo County continue to hedge on social and economic measures stuck in the past. That past is more than problematic. It is riddled with both inequity and a lack of imagination or inclusion. Best practices in urban planning, aligned with policy directives at the state and federal level, mandate a justifiable accounting of housing and urban development, underscored by state law, CEQA, and ranging from consideration of environmental and community based impacts to Native Land Rights and Public Land Use law, its community benefits and clearly designated restrictions.

At the core of this SDR DEIR Proposal is a controversial pattern of approval for unaffordable housing development at the expense of public resources, including public schools, recreational and Environmentally protected green spaces. Daly City can do better - we have to - not only for our community, but for our county. There are many other cities facing deep inequities in a lack of affordable housing and cost of living in San Mateo County, and while Daly City is the largest among them - it yet faces the greatest disparities in being able to support our majority immigrant, renter and diverse, low-income community, even when it comes to use of public school funding, public land use and apparently, even publicly-funded housing developments. This project is estimated to take 10-15 years and continues to fail to address any of these issues with due diligence. There is no justifiable proposal of any separate-but-equal public policy - in education, housing or any aspect of society - and glaring issues like this compel a complete, immediate reassessment and revision of this project. That vision must be based on sound legal and ethical, best practices in policymaking - and should begin its ultimate development with the community.

Response KK.12: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.13: There is no complete or majority consensus over the highly controversial and incomplete DEIR Proposal for the Serramonte del Rey Development project. Nobody voted on this project despite its highly controversial and questionable appropriation of public school bond money to kickstart its development. This has yet to adequately address or negotiate the many disputed issues and discrepancies of this EIR process cited over the course of two years by numerous and ongoing public comments made by local residents, youth, public officials, nonprofit and public agencies and community-based organizations, including local Native / Indigenous leaders, high school and college students, alumni, teachers, the Daly City Community Garden Alliance, and our local chapters of the Sierra Club and the NAACP.

Response KK.13: The Draft EIR was prepared to inform a forthcoming decision by the City of Daly City regarding the requested land use entitlement applications. The Draft EIR is not a proposal, but rather evaluates the proposed project, and the information is to be considered by the decision-makers as they act on the pending application. This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.14: Recommendations to specific changes to this DEIR can be found in additional public comment, input and letters submitted by the community noted here, in addition to a serious reconsideration of our city's adherence, commitment and alignment with federal housing policy and Affirmatively Furthering Fair Housing (AFFH), which should be centered as a central, guiding tenet in the formulation of Daly City's Housing Element. Daly City's application of AFFH should be assessed in alignment with the City and County of San Francisco, with which it shares a strong overlap and affinity with respect to demography, geography, and urban development and housing conditions. Disparities highlighted by US Census data, as well as that provided by the County of San Mateo Human Services Agency, are in the City of Daly City's Housing Element as well - but often stop short of a full accounting of the housing issues and solutions being considered - and require stronger transparency, outreach, and engagement of community for public input.

Response KK.14: Please refer to Master Response 3: Inclusionary Housing Ordinance and State Affordable Housing Law above. This comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment KK.15: As a city leading San Mateo County with high profile demographic indicators and status across socioeconomic and political considerations, Daly City should be looking to larger city, state and national profiles of best practices and innovative reimagining of housing and urban development. To center our city's Housing Element around housing goals projected by this SDR DEIR will fail to consider the past and present state of our city and effectively provide a critical analysis of our own community's express needs. This would be a failure to learn from the inequity

of the devastating legacy of Urban Renewal policy that has led to our current crises demanding housing, social and environmental justice today. Federal policy derived from the Green New Deal and local people's proposals have provided a template both for next generation public policy and the public process of civic and community engagement. Public comment is essential to public policy. Our community's voices are vital to ensuring that governance is indeed diverse, equitable and inclusive - and those voices will continue to redefine what our cities need as we move into another election cycle with so many critical issues facing our country at stake. It is my hope and strong encouragement that we take this opportunity in reviewing the DEIR to engage the real issues at the heart of this development in Serramonte - and Daly City altogether - to reflect, renegotiate and reimagine housing and urban development in our city, county and the state of California forward together.

Response KK.15: This comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

LL. Sabrina Brennan (dated September 8, 2023)

Comment LL.1: Please see the link below for images of Mission Blue butterflies at the Daly City Community Garden located at the Serramonte Del Rey project site. I have seen Mission Blue butterflies many times, over the years, at the Daly City Community Garden.

Here's a link:
https://link.edgepilot.com/s/62c53fff/HQEcg7UYHkOkYASrBoxXrQ?u=https://chng.it/RrrVx8CJGZ
Happy to provide more photos if you need them.

Response LL.1: Please refer to Response DD.6: above.

Section 5.0 Refinements to the Precise Plan

Since the completion of the Draft EIR, there have been small refinements to the Precise Plan that the applicant, the Jefferson Union High School District, has made in response to feedback from the City and the community. The City has reviewed these refinements and finds, as documented below, that none of these refinements have resulted in any new significant environmental impacts not analyzed in the Draft EIR; any substantial increases in the severity of environmental impacts already analyzed in the Draft EIR; or any feasible project alternative or mitigation measure capable of reducing any significant environmental impacts that is considerably different from those alternatives already analyzed in the Draft EIR. Accordingly, the refinements to the Precise Plan do not require recirculation of the Draft EIR.

Many of the refinements to the Precise Plan concern the administrative process that future developments in the project area must undergo in order to receive necessary approvals and permits from the City. These administrative changes do not impact the physical layout, buildout, or timing of the project, and therefore will not have any impacts on the physical environment.

The following refinements to the Precise Plan may concern the physical layout or buildout of the project, but do not trigger the need for further environmental review:

- An increase in maximum building height to 90 feet for Parcels A, B, and C from the previous maximum of 77 feet.
- An increase in the permitted maximum residential units on Parcel C to 152 units from the previous maximum of 125 units; however, the total number of residential units across all parcels still shall not exceed 1,235, meaning that the total number of units within the project, and both its residential density and intensity, remain unchanged.
- Elimination of the second level of parking (below-grade parking) on Parcel B and associated driveway, and a slightly reconfigured ground floor plan to reflect the elimination. Parking for Parcel B residents will be accommodated by installing mechanical lifts in the remaining ground level structure. Retail parking will be accommodated with street parking.
- A refinement of a portion of the of the loop trail path on Parcel C to account for proposed building area.
- Addition of a community garden area to Overlook Park.
- Modification of the Permitted Land Uses Table to reflect the use regulation in the Commercial Mixed Use (CMU) District.
- A modification to the layout of South Access Way to have 26 feet clear for emergency vehicle access by replacing diagonal parking along the street with parallel parking on southside of the street.
- A widening of Parcel C by 9', 4" along its northern boundary, with a corresponding reduction of Parcel D along its southern boundary.

- Widened street sections to incorporate protected, Class IV bike lanes at Entry Drive, North Drive, East Drive, Campus Drive, North and South Access Way; added Class II bike lanes to the existing Campus Drive from the roundabout to Hickey Boulevard.
- Select sidewalk widening, ADA and wood retaining wall improvements on Callan Boulevard sidewalk along portions of the east side of the plan area.
- Establishing a connection between project stormwater infrastructure and the existing 24-inch storm drain at southern plan area that connects to the storm drain line in Callan Boulevard, which functions as a second storm drainage outfall for the project site. Modified storm drainage system to utilize this second outfall.

Below is a table of each modification to the Precise Plan that concerns the physical layout or buildout of the project. For each modification, there is an accompanying analysis of the modification effect on the Draft EIR's analysis of environmental impacts.

Modification	**Analysis of Potential Impact**
An increase in maximum building height to 90 feet for Parcels A, B and C from the previous maximum of 77 feet.	As discussed in Section 3.1 Aesthetics under Impact AES-1 of the Draft EIR (page 27), the project site is located on an infill site within a transit priority area. Therefore, under Senate Bill 743, aesthetic impacts of the project shall not be considered significant impacts. The Draft EIR concluded that the project would not result in any significant aesthetic impacts, and similarly, any changes to the physical design of the project, including building heights, massing, and layouts will not result in any new significant aesthetic impacts pursuant to State law. The Draft EIR analyzed building heights with respect to Impact HAZ-5, which studied whether the project would result in a safety hazard or excessive noise for people residing or working in the project area given the project's location within an airport use plan. As the Draft EIR notes, the project site is located on terrain that is 200 feet or greater above ground level. As such, the project was already subject to a requirement to file either (a) FAA Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA at least 30 days prior to construction, so that the project can be reviewed for aviation compatibility; or (2) a signed exemption form pursuant to 14 CFR Part 77.9(b) be submitted prior to construction. (Draft EIR page 109). The project will remain

Modification	Analysis of Potential Impact
	subject to this requirement. On July 22, 2021, the Board of Directors of the San Mateo County Airport Land Use Commission determined that the proposed Precise Plan (including the Parcel B Development project) is consistent with the SFO ALUCP and FAR Part 77 regulations. (Draft EIR page 109). This determination was based on an assumption that buildings on Parcel D, E, and F could potentially reach 150 feet in height. Accordingly, an increase of maximum building height for Parcels A, B and C to allow for buildings to reach 90 feet will not be inconsistent with the SFO ALUCP and FAR Part 77 regulations. The increase in height will not result in any new safety hazard for people residing or working in the project area, or any increase in previously identified safety hazards for people working or residing in the project area. Permitted building heights do not factor into or impact analysis of Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials (with the exception of Impact HAZ-5 discussed above), Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
An increase in the permitted maximum residential units on Parcel C to 152 units from the previous maximum of 125 units. However, the total number of residential units across all parcels still shall not exceed 1,235, meaning that the total number of units within the project remains unchanged.	Calculations of the environmental impacts of the project are based on the total project population as a whole (i.e., 1,235 residential units, 14,000 square feet of commercial uses, and 2,400 square foot childcare facility), not the number of units on any particular parcel. The total number of units across the project remains the same as studied under the Draft EIR; therefore this modification will not alter any of the analysis or conclusions in the Draft EIR.

Modification	Analysis of Potential Impact
	The potential for the construction of 27 more units on Parcel C will not have any substantial impact on construction timelines, intensity, or required construction equipment. Furthermore, the Draft EIR's air quality analysis for construction impacts already conservatively assumed a six-year construction period, since compressing the total construction activity into a shorter period of time results in higher daily emissions than if the project were built over a longer period of time. Any lengthening of the construction timeline as a result of longer Parcel C construction will further reduce forecasted environmental impacts. Meanwhile, the inclusion of slightly more units on Parcel C does not alter the conservative assumptions set forth in the health risk assessment, which already assumes the presence of generators near project boundaries that are located near sensitive receptors (e.g., Parcels E and F). Further, any changes to the massing or design of the Parcel C building shall not be considered significant impacts under Senate Bill 743. An increase in maximum permitted units on Parcel C, while still staying within the overall project unit count of 1,235 units upon which the DEIR based its analysis, will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
Elimination of the second level of parking (below-grade parking) on Parcel B and associated driveway, and a slightly reconfigured ground floor plan to reflect the elimination. Parking for Parcel B residents will	Under Senate Bill 743, parking impacts of this project shall not be considered significant impacts.

Modification	Analysis of Potential Impact
be accommodated by installing mechanical lifts in the remaining ground level structure. Retail parking will be accommodated with street parking.	Elimination of below-grade parking on Parcel B will potentially lessen the extent of excavation needed on Parcel B, thereby potentially reducing impacts related to Air Quality emissions from construction, Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise, and Tribal Cultural Resources. An elimination of below grade parking on Parcel B will have no impact on Agriculture and Forestry Resources, Biological Resources, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, or Wildfire.
A refinement of a portion of the loop trail path on Parcel C to account for proposed the proposed building area.	The loop trail will continue to provide open space and park access for project users, and the project as a whole will continue to provide approximately 6.5 acres of park space. The project will continue to pay in-lieu fees to offset recreational demand for parkland not provided by the proposed project and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400. Accordingly, this modification will not result in any new or increased recreation impacts. The modification of the loop trail path will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
Addition of a community garden area to Overlook Park.	The addition of a community garden will not impact the size of Overlook Park or access to overlook park. The garden would replace an area previously designed to be grass; thus,

Modification	Analysis of Potential Impact
	there would be no change in anticipated water use. The project as a whole will continue to provide approximately 6.5 acres of park space. The project will continue to pay in-lieu fees to offset recreational demand for parkland not provided by the proposed project and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400. Accordingly, this modification will not result in any new or increased recreation impacts. The addition of a community garden to Overlook Park will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
Modification of the Permitted Land Uses Table to reflect the use regulation in the Commercial Mixed Use (CMU) District.	The Draft EIR already studies the impact of a General Plan Amendment to change the land use designation of the project site from C-O (Commercial – Office) to C-MU (Commercial – Mixed Use). (Page 3, 124). The actual scope of development, as documented elsewhere herein, is not changing in any significant manner, and the refinement of the General Plan designation, as implemented through virtually the same Precise Plan, is a "paper" change that does not alter the environmental analysis. Accordingly, the modification of the Permitted Land Uses Table to reflect the use regulation in the Commercial Mixed Use (CMU) District will have no effect on the environmental analysis already contained in the Draft EIR.

Modification	Analysis of Potential Impact
A refinement to the layout of South Access Way to have 26 feet clear for emergency vehicle access by replacing diagonal parking along the street with parallel parking on southside of the street.	Under Senate Bill 743, parking impacts of this project shall not be considered significant impacts. Modifying street layout to better accommodate emergency vehicle access will not negatively affect the project's transportation impacts. In fact, the modification is in accordance with MM TRN-4.1, which requires all future development within the project site to provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. The modification to the layout of South Access Way will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
A widening of Parcel C by 9', 4" along its northern boundary, with a corresponding reduction of Parcel D along its southern boundary.	A small alteration to the boundaries of Parcel C and Parcel D, with no increase in the overall project site, will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
Widened street sections to incorporate protected, Class IV bike lanes at Entry Drive, North Drive, East Drive, Campus Drive, North and South Access Way; added Class II bike	Incorporating protected bike lanes on project streets is consistent with the analysis conducted in the Draft EIR, which assumed "new bike lanes and sidewalks […] throughout the project site." (Page 11, 39). The

Modification	Analysis of Potential Impact
lanes to the existing Campus Drive from the roundabout to Hickey Boulevard.	Transportation analysis of the project assumed that the project would "provide Class I, Class II, and Class III bicycle facilities on interior roadways within the project site" and would therefore comply with General Plan Policies CE-13 and CE-20. Class IV bike lanes provide protection above and beyond the level required under the General Plan, and would remain consistent with those policies. Inclusion of Class IV bike lanes will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.
Select sidewalk widening, ADA, and wood retaining wall improvements on Callan Boulevard sidewalk along portions of the east side of the plan area.	Incorporating improved internal sidewalks is consistent with the analysis conducted in the Draft EIR, which assumed that the project may be required to construct sidewalk improvements on Callan Boulevard. (Page 11). Sidewalk widening, ADA, and wood retaining wall improvements on Callan Boulevard sidewalk will have no effect on the environmental analysis already contained in the Draft EIR. In fact, if proposed in isolation, these improvements would be subject to CEQA exemptions covering improvements to pedestrian networks.
Establishing a connection between project stormwater infrastructure and the existing 24-inch storm drain at southern plan area that connects to the storm drain line in Callan Boulevard, which functions as a second storm drainage outfall for the project site. Modified storm drainage system to utilize this second outfall.	The connection of the project stormwater infrastructure to existing infrastructure entails only de minimis construction activity that would not meaningfully affect the environment compared to the construction impacts already analyzed in the Draft EIR. The project's performance standard still requires that post-project drainage is at or less than pre-project drainage.

Modification	Analysis of Potential Impact
	This stormwater infrastructure refinement will have no impact on Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, or Wildfire.

As demonstrated in the foregoing analysis, the refinements to the Precise Plan will not result in any new significant environmental impacts not analyzed in the Draft EIR; any substantial increases in the severity of environmental impacts already analyzed in the Draft EIR; or any feasible project alternative or mitigation measure capable of reducing any significant environmental impacts that is considerably different from those alternatives already analyzed in the Draft EIR; therefore recirculation of the Draft EIR is not required due to these project refinements.

Section 6.0 Draft EIR Text Revisions

This section contains revisions to the text of the Serramonte Del Rey Campus Redevelopment Draft EIR dated June 2023. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page iv **REVISE** the last sentence of the fourth paragraph under Summary of the Project as follows:

The building would include one level of at-grade parking. ~~two levels of parking, with one level of below grade parking.~~

Page ix, 66 **ADD** the following text to the fourth bullet in mitigation measure MM BIO-1.2:

- If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season. The qualified biologist shall also contact the California Department of Fish and Wildlife (CDFW) and coordinate with CDFW on measures to protect the roosts.

Page xii, 140 **ADD** the following measure after the first bullet to MM NOI-1.1:

MM NOI-1.1: The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls:

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Construct a temporary noise barrier, where feasible, between Parcel C and Shasta High School to screen noise-generating equipment. Temporary noise barrier fences would provide a 7 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. To achieve a 7 dBA of noise reduction the temporary barrier shall block line of sight to the top of the Shasta High School building windows.

Page xvi **DELETE** MM TRN-3.2:

~~**MM TRN-3.2:** As part of the Parcel B Development project's final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer:~~

- ~~Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means.~~
- ~~Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly.~~
- ~~Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway.~~
- ~~The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements.~~
- ~~A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City's determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd.~~

Page 3 **REVISE** Table 2.2-1 as follows:

Table 4.1-1: Development Maximum Per Parcel

Parcel Number	Maximum Residential Units[1]	Maximum Retail/Commercial (square feet)[3]
Parcel A[2]	122	0
Parcel B	210	8,000
Parcel C[5]	~~125~~152	6,000[4]
Parcel D	270	6,000
Parcel E	330	6,000
Parcel F	400	6,000

1. Shows maximum residential units per parcel; however, the total amount of residential units across all parcels shall not exceed 1,235 units.

2. Parcel A has been constructed and occupied and was approved under a separate application

3. Parcels C-F may provide retail/commercial space in addition to the 8,000 square feet assumed for Parcel B; however, the total amount across all parcels shall not exceed 14,000 square feet

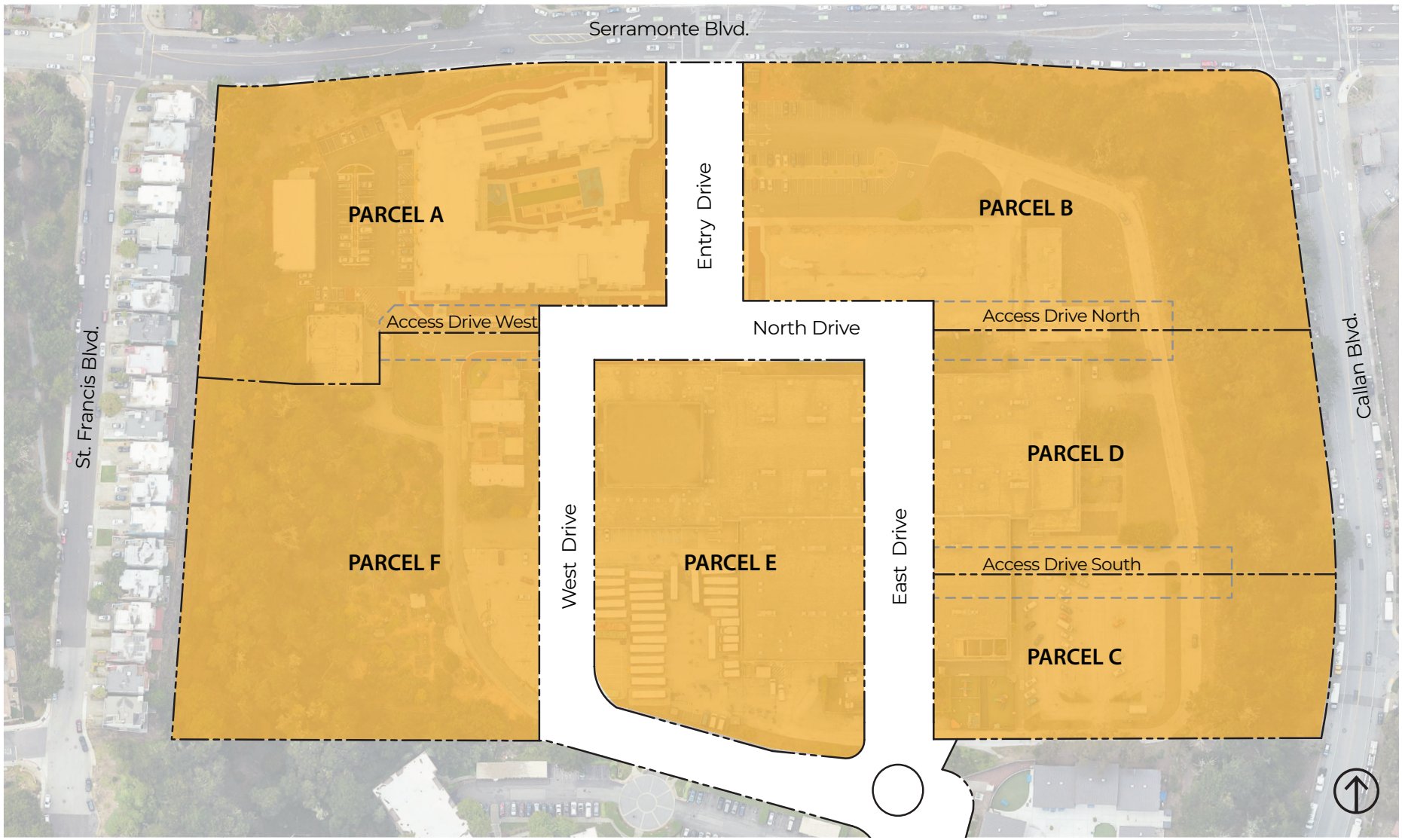
4. Parcel C is permitted to build up to 1,400 square feet of childcare facilities in addition to the overall retail/commercial square footage

5. Parcel C would be subdivided into two parcels (C1 and C2)

Page 3 **REVISE** the second sentence under Table 2.2-1 as follows:

Parcels A, B, and C would have maximum building heights of ~~77~~90 feet, and Parcels D, E, and F would have a maximum building height of 150 feet.

Page 9 **REPLACE** Figure 2.2-5 with the following figure:



PROPOSED PRECISE PLAN PARCELS | FIGURE 2.2-5

Page 10 **ADD** the following text to the last sentence of the second paragraph under Serramonte Del Rey Demonstration Garden:

JUHSD is providing raised planter beds at their new adult education building located at 123 Edgemont Drive, which was approved by the JUHSD Board on August 17, 2021 (see Figure 2.2-6), and at the proposed public park on Parcel B (see Section 2.2.2.2 below).

Page 10 **REVISE** the second paragraph under Parcel B Development Project as follows:

The proposed development would demolish the existing building and surface parking on-site and construct a seven-story (up to 73.5 feet to top of parapet and ~~85~~86.5 feet to top of elevator shaft, see Figure 2.2-9), mixed-use building with 201 residential units and approximately 8,000 square feet of retail space. The building would include ~~two levels~~ one level of ground-floor parking ~~(one level of below grade parking)~~. A total of 334 parking spaces would be provided, with 301 of the spaces serving the residential units and 33 of the spaces reserved for retail customers and leasing. ~~The lower level of the parking garage would provide 212 parking spaces serving the residential units. An additional 133 parking spaces would be provided on the ground-floor, with 43 reserved for retail customers and leasing and the remainder reserved for residential parking.~~

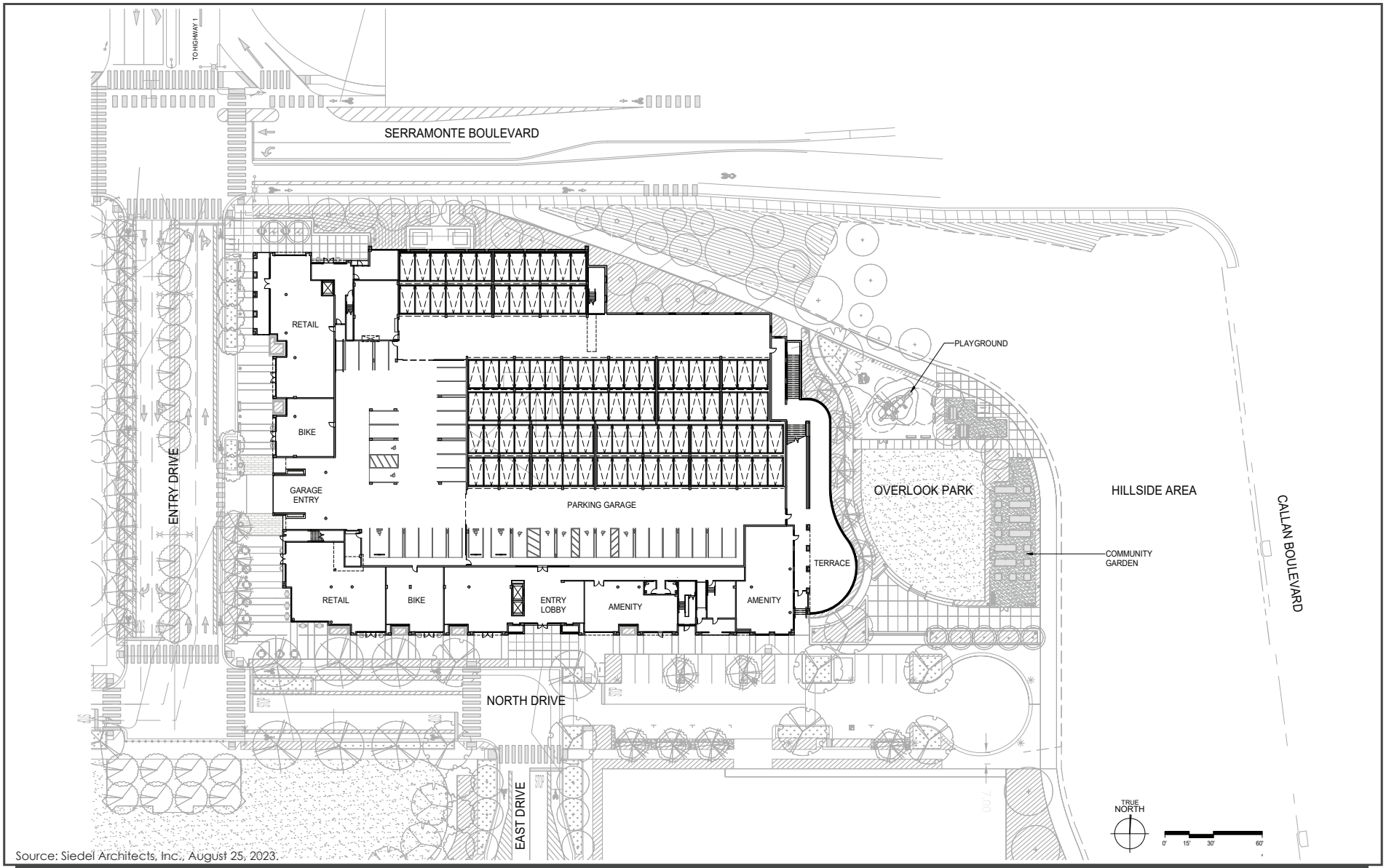
Page 10 **REVISE** the first paragraph under Site Access and Circulation as follows:

Vehicular access to the Parcel B site would be provided via ~~a new driveway and the existing entry drive on Serramonte Boulevard (see Figure 2.2-8). The new driveway would be located east of the existing entry drive and provide direct access to the lower parking level. A~~an entry road ~~would~~that runs north-south between Parcels A and B from the existing driveway along Serramonte Boulevard. An entrance to the proposed ground-floor parking ~~(i.e. the upper level of the parking garage)~~ would be located along this new road. A new road serving Parcels A and B would run west-east along the southern boundaries of Parcels A and B. A new multi-use pathway would be constructed around the perimeter of the proposed mixed-use building and Parcel B.

Page 11 **ADD** the following bullet to the bulleted list as follows:

- Hickey Boulevard/Callan Boulevard right-turn lane addition

Page 14 **REPLACE** Figure 2.2-8 with the following figure:



Source: Siedel Architects, Inc., August 25, 2023.

PARCEL B CONCEPTUAL SITE PLAN | FIGURE 2.2-8

Page 15 **REPLACE** Figure 2.2-9 with the following figure:

SOUTH ELEVATION (NORTH DRIVE)

WEST ELEVATION (ENTRY DRIVE)

Source: Siedel Architects, Inc., August 25, 2023.

PARCEL B CONCEPTUAL BUILDING ELEVATIONS | FIGURE 2.2-9

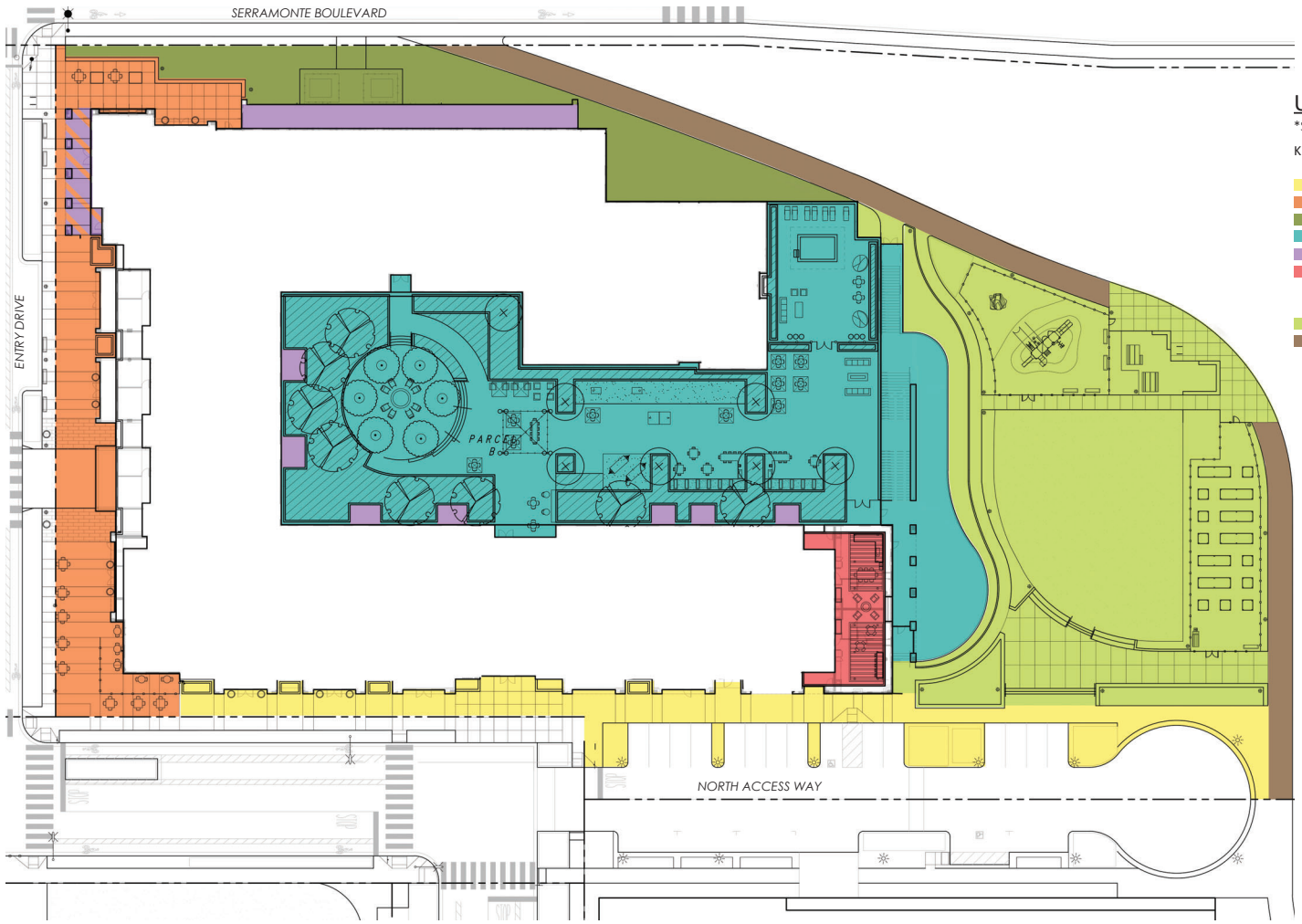
Page 16 **REVISE** the first sentence under Open Space and Landscaping as follows:

The proposed Parcel B development project would include three components of open space to be used by the public: 1) approximately 22,300 square-foot public park that would include a large grass area, ~~and~~ playground, and community garden with raised planter beds; 2) the first phase of the recreational trail (approximately 6,800 square feet) that would be located in the southeast corner of Parcel B; and 3) open space for public use at the retail plaza (approximately 7,000 square feet) facing the new entry road (see Figure 2.2-10).

Page 16 **REVISE** the second paragraph under Utility, Drainage, and Off-Site Improvements as follows:

Stormwater would be treated on-site with area drains, drop inlets, manholes, bioretention areas, and below-grade pipes, before being discharged to a 24-inch storm drain lines in Serramonte Boulevard and Callan Boulevard. The project would treat stormwater before entering the city's storm drain system. In addition, an infiltration gallery is proposed to offset an increase in runoff generated from the proposed development.

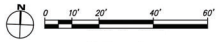
Page 17 **REPLACE** Figure 2.2-10 with the following figure:



USEABLE OPEN SPACE SUMMARY

*SEE ARCHITECTURE DRAWINGS FOR PRIVATE BALCONY & DECK AREAS

KEY	NAME	AREA	LEVEL
	PEDESTRIAN STREETSCAPE	6,505 SF	GROUND FLOOR
	RETAIL PLAZA	6,965 SF	GROUND FLOOR
	LANDSCAPE (<10%)	5,390 SF	GROUND FLOOR
	COURTYARD & TERRACE	24,360 SF	GROUND/2ND
	*PRIVATE BALCONIES OR DECKS	2,585 SF	ALL LEVELS
	ROOF TERRACE	1,346 SF	6TH FLOOR
	SUBTOTAL	**47,151 SF**	
	PARK(<10%)	22,295 SF	GROUND FLOOR
	RECREATION TRAIL	5,985 SF	GROUND FLOOR
	SUBTOTAL	**28,280 SF**	
	TOTAL	**75,431 SF**	



Source: Siedel Architects, Inc., August 25, 2023.

PARCEL B CONCEPTUAL OPEN SPACE PLAN | FIGURE 2.2-10

Page 102 **REVISE** the heading and text of under San Mateo County Comprehensive Airport Land Use Plan as follows:

~~San Mateo County~~ Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport

Daly City is within the jurisdiction of the ~~San Francisco Airport (SFO) Land Use Plan component of the San Mateo County~~ Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP), adopted ~~in December 1996 and updated in 2001~~ November 2012. Established in the ~~CLUP~~ SFO ALUCP are procedures used by the San Mateo City and County Association of Governments (C/CAG) to review land use decisions in the vicinity of San ~~Mateo County airports~~ Francisco International Airport. Airport planning boundaries define where height, noise and safety standards, policies, and criteria are applied to certain proposed land use policy actions.

Page 104 **REVISE** the text under Airport Hazards as follows:

The project site is located within the SFO ~~CLUP~~ ALUCP Airport Influence Area B, which requires projects to be consistent with the goals and policies of the ~~CLUP~~ SFO ALUCP. The project site is approximately five miles northwest from the runway termination point of the San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the Community Noise Equivalent Level (CNEL) noise contours for the airport, as delineated in the ~~CLUP~~ SFO ALUCP.

Page 124 **REVISE** the first sentence of the third paragraph under Impact LU-2 as follows:

The proposed project would construct housing within the City of Daly City and it aligns with the City's Inclusionary Housing Ordinance in providing ~~at least 10~~ 20 percent affordable housing, which is double the required amount.

Page 129 **REVISE** the heading and text under Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport as follows:

Comprehensive Airport Land Use Compatibility Plan for the Environs of ~~the~~ San Francisco International Airport

~~As discussed in more detail in Section 4.10 Land Use, t~~The project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility

criteria, and airspace protection/height limitation criteria in the SFO ALUCP. The site is located outside of the SFO 65 dB CNEL noise contour.

Page 159 **ADD** the following text to the third sentence of the first paragraph under Impact PS-4:

The Parcel B Development project includes a public park with a community garden, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre.

Page 161 **REVISE** the first paragraph under Schools as follows:

Only one of cumulative projects from Table 3.0-1 (Serramonte Condominiums) is a residential project that would generate new students and it is located within the ~~Brisbane Elementary School District; therefore, it would not have any impacts on the~~ Jefferson Elementary School District~~.~~ and ~~Serramonte Condominiums is, however, within the boundary for~~ Jefferson Union High School District. The Serramonte Condominiums project proposes 323 residential units, which would generate approximately 191 new K-8 students and 29 new high school students. Daniel Webster Elementary School currently has an available capacity of 290 students and Fernando Middle School currently has an available capacity of 309 students (see Table 3.15-1). Westmoor High School currently has available capacity of 846 students (see Table 3.15-1) and can easily accommodate the proposed project's and the Serramonte Condominiums project's new high school students.

Page 165 **ADD** the following text to the third sentence under Impact REC-1:

The Parcel B Development project includes a privately owned, publicly accessible park with a community garden, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre, which would partially off-set demand on nearby recreational facilities.

Page 177 **REVISE** the third sentence of the second paragraph under Bicycle and Pedestrian Facilities as follows:

Consistent with General Plan Policies CE-13 and CE-20, the project proposes to provide Class I, Class II, ~~and~~ Class III, and Class IV bicycle facilities on interior roadways within the project site and Class II bicycle facilities along eastbound and westbound Serramonte Boulevard that would improve bicycle access to and from the site.

Page 177 **ADD** the following text to the last sentence under Storm Drainage:

Surface runoff from the project site is collected in area drains and conveyed to a 24-inch storm drain in Serramonte Boulevard and Callan Boulevard that flows to the east.

Page 181-182 **REVISE** the first through third paragraphs under Geometric Design as follows:

As discussed under Impact TRN-1, vehicles would access the project site through a northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or through a southern access point accessible from Hickey Boulevard via Campus Drive. ~~The project would also include a right-in/right-out driveway onto Serramonte Boulevard approximately 200 feet east of Entry Drive; this driveway would provide access to the Parcel B garage. Since the driveway to the Parcel B garage as designed would be unsignalized, it could potentially conflict with vehicle, bicycle, and pedestrian traffic on Serramonte Boulevard.~~

~~**Mitigation Measure:**~~

~~**MM TRN-3.2:** As part of the Parcel B Development project's final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer:~~

- ~~Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means.~~
- ~~Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly.~~
- ~~Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway.~~
- ~~The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements.~~
- ~~A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City's determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd.~~

~~Implementation of MM TRN-3.2 would ensure that vehicles exiting the driveway would have adequate sight distance and would not be able to make illegal left-turns which could create hazards for other vehicles, bicycles, and pedestrians. Additionally, MM TRN-3.2 would alert vehicles entering and exiting the driveway of the presence of bicycles and pedestrians. As such, implementation of MM TRN-3.2 would ensure that the proposed driveway does not substantially increase hazards.~~

The project ~~also~~ proposes to construct residential buildings that would each have their own gated parking garages, which residents would be able to access through the use of a keycard or equivalent

technology. Queues at these parking garages could conflict with bicycle and pedestrian facilities if not designed properly.

Draft Environmental Impact Report

Serramonte Del Rey Campus Redevelopment

SCH# 2023060571

Prepared by

DALY CITY · CALIFORNIA · INCORPORATED MARCH 22 1911 · GATEWAY TO THE PENINSULA

In Consultation with

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

June 2023

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SUMMARY

The City of Daly City, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Serramonte Del Rey Campus Redevelopment project in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As the CEQA Lead Agency for this project, the City of Daly City is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts (including growth-inducing impacts and cumulative impacts), mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

Summary of the Project

The approximately 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard in the City of Daly City (APN 091-211-230). The site is currently developed with the Jefferson Union High School District offices and adult education buildings, Head Start, Parcel A Development project (JUHSD Faculty and Staff Housing project consisting of 122 units), surface parking lots, and associated landscaping.

The project consists of two primary components: (1) development of a new approximately 22-acre Serramonte Del Rey Precise Plan (Precise Plan), and (2) a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan.

The new Precise Plan would allow for the redevelopment of the project site area with up to 1,235 units (which includes the existing 122 units on Parcel A) of affordable and market-rate rental housing, up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 2,400 square feet for a Head Start childcare facility), and infrastructure improvements throughout the project area. Compared to the existing approved Precise Plan, the proposal would result in a net increase of 1,060 residential units and the elimination of planned office space.

The proposed Parcel B development would demolish an existing Adult Education building and surface parking on-site and construct a seven-story, mixed-use building with 201 residential units and approximately 8,000 square feet of retail space on a 4.3 acre portion of the site located at the northwest corner of the project site. The building would include two levels of parking, with one level of below grade parking.

Summary of Significant Impacts and Mitigation Measures

The following is a summary of the significant impacts and mitigation measures addressed within this EIR. The project description and full discussion of impacts and mitigation measures can be found in Section 2.0 Project Description and Section 3.0 Environmental Setting, Impacts, and Mitigation.

Significant Impact	Mitigation Measures
Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. **(Less than Significant Impact with Mitigation Incorporated)**	**MM AIR-2.1:** BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times a day and at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content shall be verified by lab samples or moisture probe. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using a wet power vacuum street sweeper at least once per day. The use of dry power sweeping shall be prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.

Significant Impact	Mitigation Measures
	• The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. **MM AIR-2.2:** Selection of Construction Equipment: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards PM (PM10 and PM2.5), if feasible, otherwise, • Use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices that altogether achieve a 50-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination). • Use of electrical or non-diesel fueled equipment. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater. Elements of the plan could include a combination of some of the following measures: • Implementation of Tier 4 or alternatively fueled equipment, • Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors, • Use of electrically-powered equipment,

Significant Impact	Mitigation Measures
	• Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered, • Change in construction build-out plans to lengthen phases, and • Implementation of different building techniques that result in less diesel equipment usage. Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction. **MM AIR-2.3:** Low Volatile Organic Compounds (VOC) Coating: The project shall use low volatile organic compound or VOC (i.e., ROG) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 50 percent of all residential and nonresidential interior paints and 50 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 50 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used.
Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**	See mitigation measures MM AIR-2.1 and MM AIR-2.2 above. **MM AIR-3.1:** Prior to the issuance of a grading permit, the applicant shall provide the City with the most recent construction phasing schedule by parcel for buildout of the proposed Precise Plan. If the most recent construction phasing schedule increases the number of units per construction phase compared to the construction phasing assumed in the air quality analysis of this EIR, the applicant shall prepare an updated community health risk assessment to confirm that the new phasing will not result in any new or more significant air quality impacts not previously disclosed in this EIR. The updated community health risk assessment shall be reviewed and approved by the Director of Community Development or Director's designee.

Significant Impact	Mitigation Measures
Impact AIR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**	See mitigation measures MM AIR-2.1 and MM AIR-2.2 above.
Impact BIO-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. **(Less than Significant Impact with Mitigation Incorporated)**	**MM BIO-1.1:** • If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions. • If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season. • If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions. • If active bird nests are found, an adequate setback shall be established by a qualified biologist, approved by the City Planning Division, around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated elsewhere on the site outside this zone. • A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-

Significant Impact	Mitigation Measures
	nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria. **MM BIO-1.2:** Adequate measures shall be taken to avoid roosting by special-status bat species as a result of tree removal and building demolition, specifically: • To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e., generally avoiding tree removal or trimming April through October). • Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e., generally avoiding demolition April through October). • If tree removal, trimming, or building demolition occurs within bat maternity season (i.e., generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities. • If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season. • Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs shall remain on the ground for at least 24-hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition. • A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.

Significant Impact	Mitigation Measures
Impact BIO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**	See mitigation measures MM BIO-1.1 and MM BIO-1.2 above.
Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**	**MM CUL-2.1:** Undiscovered Archaeological Resources. 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's Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. the City's 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 Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC. **MM CUL-2.2:** 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 certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.
Impact CUL-3: The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact with Mitigation Incorporated)**	**MM CUL-3.1:** Human Remains. If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's 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

Significant Impact	Mitigation Measures
	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.
Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact with Mitigation Incorporated)**	**MM GEO-6.1:** Unique Paleontological and/or Geologic Features and Reporting. 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's Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. 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.
Impact GEO-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**	See mitigation measure MM GEO-6.1 above.
Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**	**MM HAZ-2.1:** Prior to the issuance of demolition, grading, or building permits for projects on Parcels C-E, the applicant shall remove the existing underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with the San Mateo County Department of Environmental Health's (SMCDEH) Underground Storage Tank Program and Aboveground Petroleum Storage Tank Program. During removal of the ASTs and USTs, contractors shall observe for staining and spilled contaminants. If stains and/or spills are observed, an Environmental Professional shall be retained to collect soil samples for laboratory analysis in accordance

Significant Impact	Mitigation Measures
	with commonly accepted environmental protocols. If contaminants are identified at concentrations exceeding applicable screening levels published by the RWQCB, DTSC and/or EPA , appropriate mitigation measures, such as, but not limited to, a Soil Management Plan and Health Safety Plan, shall be incorporated into the demolition permit. Approval by an appropriate regulatory agency (i.e., RWQCB, DTSC or SMCDEH) shall be obtained prior to conducting earthwork activities in the vicinity of the impacted soil. The applicant shall provide documentation of the safe removal of all existing USTs and ASTs consistent with SMCDEH requirements to Director of Economic and Community Development or Director's designee for review and approval.
Impact HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant Impact with Mitigation Incorporated)**	See mitigation measure MM HAZ-2.1 above.
Impact NOI-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **(Less than Significant Impact with Mitigation Incorporated)**	**MM NOI-1.1:** The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls: • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists.

Significant Impact	Mitigation Measures
	• Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Route construction-related traffic along major roadways and as far as feasible from sensitive receptors. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.
Impact TRN-2: The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact with Mitigation Incorporated)**	**MM TRN-2.1:** Prior to issuance of building permits, the project applicant shall develop a transportation demand management (TDM) plan for the proposed project (except for the Parcel A development project which has already been occupied) in accordance with C/CAG's Transportation Demand Management Policy Implementation Guide, including any anticipated phasing, and shall submit the TDM Plan to the City for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the trip reduction, as required to reduce the VMT per resident from 12.0 to 11.6. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.

Significant Impact	Mitigation Measures
	Trip reduction strategies applicable to the proposed project may include, but are not limited to, the following: • Provide Secure and Accessible Bike Parking • Provide Bicycle Maintenance Facilities • Price and Unbundle Parking • Provide Carpooling Programs • Implement Car-Sharing Program • Implement Loaner Bike Program • Provide a Transit Riders Guide • Provide a Dedicated Transportation Coordinator • Provide an Online TDM Information Center • Free Trial Rides on Transit Services • Implement a Subsidized or Discounted Transit Program The TDM plan shall indicate the estimated Vehicle Trip Reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the TDM plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the City and install the improvements prior to building occupancy. Applicant will resubmit TDM Plan if there is a material adverse impact resulting from a change from the permitted uses (i.e., unit count, use type, phasing). The TDM Plan shall require annual evaluation of the program by the property owner, to determine if the program goals in reducing automobile travel are satisfied and to assess the effectiveness of the various strategies implemented. The property owner shall be required to conduct biennial self-certification for the first six years of project occupancy per the C/CAG TDM Program. The property owner shall conduct annual travel surveys and driveway counts to monitor the amount of automobile travel generated by the project. The goal of the TDM Plan and programs shall be to reduce the project's daily VMT per resident from 12.0 to 11.6. Based on the results of the surveys, the TDM programs shall be increased if these requirements are not met. Annual travel surveys and driveway counts (TDM program monitoring) shall be conducted for the first two years following project occupancy. The results of the monitoring program and travel surveys shall be submitted to the City for review and

Significant Impact	Mitigation Measures
	approval. If the program VMT reduction goals are met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied.
Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact with Mitigation Incorporated)**	**MM TRN-3.1:** A Construction Traffic Management Plan shall be developed and implemented to minimize impacts to the transportation system. The Construction Traffic Management Plan shall detail the Project's construction schedule, vehicle type time-of-day plans, route planning, advanced public notices of partial or full street closures or traffic diversion, and other strategies to reduce potential conflicts during construction. The plan shall include, but not be limited to, the following: • Identification of the traffic controls and methods proposed during each phase of Project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with Daly City standards and the requirements of the California Manual of Uniform Traffic Control Devices (CA MUTCD 2014, Revision 6). • Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans. • A prohibition on all construction truck activity during the weekday morning and evening peak commute periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). • Preservation of emergency vehicle access. • Identification of approved truck routes in communication with Daly City staff. • Location of staging areas and the location of construction worker parking. • Identification of the means and locations of the separation (i.e. fencing) of construction areas and adjacent active uses. • The provision of flaggers at all on-site locations where construction trucks and construction worker

Significant Impact	Mitigation Measures
	vehicles conflict with vehicle, bicycle, transit, or pedestrian traffic. • Provision of a point of contact for residents to obtain construction information, have questions answered and convey complaints. **MM TRN-3.2:** As part of the Parcel B Development project's final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer: • Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means. • Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly. • Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway. • The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements. • A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City's determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd. **MM TRN-3.3:** As part of the project's final design, each residential facility's garage entrance accessed via the public right of way shall be designed to provide adequate storage for expected vehicle queues. The amount of storage shall be calculated based on the individual garage size and forecast rates of arrival and departure. A minimum stacking distance of 25 feet shall be provided between the back of curb and gate installation at the entrance to each residential garage entrance. The purpose of this space is to minimize the instance of vehicles queued across sidewalks and bicycle facilities. These queue calculations shall be performed for

Significant Impact	Mitigation Measures
	each garage and submitted to the City Engineer with planning/building permit for review and approval.
Impact TRN-4: The project would not result in inadequate emergency access. **(Less than Significant Impact with Mitigation Incorporated)**	**MM TRN-4.1:** In accordance with City and North County Fire Authority requirements and design standards, all future development within the project site shall provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the final design and permitting process, each proposed development shall seek and obtain approval from the North County Fire Authority.
Impact TRN-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**	See mitigation measure MM TRN-2.1 above.
Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact with Mitigation Incorporated)**	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.
Impact TCR-2: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. **(Less than Significant Impact with Mitigation Incorporated)**	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.
Impact TCR-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**	See mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 above.

Summary of Project Alternatives

The California Environmental Quality Act (CEQA) requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines state that an EIR must identify alternatives that would feasibly attain the most basic objectives of the project, but avoid or substantially lessen significant environmental effects, or further reduce impacts that are considered less than significant with the incorporation of mitigation. A summary of project alternatives follows. The EIR considered three alternatives, beyond those presented below, but rejected them for further analysis. A full analysis of project alternatives is provided in Section 7.0 Alternatives.

No Project Alternative

The No Project Alternative assumes that the project site would remain as it is today with the existing buildings being reoccupied. All environmental impacts of the project would be avoided. However, this alternative would not achieve any of the project objectives.

No Project – Existing Zoning Alternative

The No Project – Existing Zoning Alternative is what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. This alternative assumes the project is not approved and the project site is redeveloped consistent with the current zoning of PD-31 (Planned Development District).[1] The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units (53 units in addition to the 122 units developed on Parcel A) and approximately 700,000 square feet of office space. Associated infrastructure and roadway improvements would also be required in order to construct the No Project – Existing Zoning Alternative. This alternative would lessen the project's construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts because it would reduce overall building square footage by approximately 500,000 square feet, but result in slightly greater VMT impacts per resident. This alternative would result in the same or similar impacts to all other environmental resource areas as the project. This alternative does not meet the project objective of providing new market-rate and affordable housing given this alternative would yield 175 units, substantially below the 1,235 proposed. This alternative would result in substantial office space on the project site, which is not an objective of the project.

Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. As described in Section 7.0 Alternatives, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided. In addition to the No Project Alternative, the No Project – Existing Zoning Alternative would be an environmentally superior alternative.

[1] A smaller portion of the of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31A zoning was specifically created to allow for the Parcel A Development project, which will construct 122 multifamily units. Since this project is already approved and under construction, the remainder of the project site would be developed consistent with the PD-31 zoning.

Areas of Concern

Environmental concerns expressed thus far from local residents, property owners, organizations, and/or agencies about the project include the following:

- Air quality impacts
- Biological impacts (nesting birds, wetlands, trees)
- Tribal and cultural resources
- School impacts
- Airport safety
- Project-generated traffic on roadway and freeway capacity
- Bicycle/Pedestrian impacts
- Required connections to existing utilities infrastructure and needed improvements
- Loss of an informal community garden space

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The City of Daly City, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Serramonte Del Rey Campus Redevelopment project in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.[2]

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines 15121(a)). As the CEQA Lead Agency for this project, the City of Daly City is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

1.2 EIR PROCESS

1.2.1 Notice of Preparation and Scoping

In accordance with Section 15082 of the CEQA Guidelines, the City of Daly City prepared a Notice of Preparation (NOP) for this EIR. The NOP was circulated locally on May 7, 2021 and the standard 30-day comment period concluded on June 7, 2021. The NOP was circulated to state and federal agencies through the State Clearinghouse on June 21, 2023 and the 30-day comment period concluded on July 21, 2023. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. City of Daly City also held a public scoping meeting on May 19, 2021 to discuss the project and solicit public input as to the scope and contents of this EIR. The meeting was held virtually through a video conference call due to COVID-19 restrictions. Appendix A of this EIR includes the NOP and comments received on the NOP.

1.2.2 Draft EIR Public Review and Comment Period

Publication of this Draft EIR will mark the beginning of a 45-day public review period. During this period, the Draft EIR will be available to the public and local, state, and federal agencies for review and comment. Notice of the availability and completion of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP, as well as the Office of Planning and Research. Written comments concerning the environmental review contained in this Draft EIR during the 45-day public review period should be sent to:

[2] The project site is owned and operated by the Jefferson Union High School District; however, since the project is proposing residential and commercial uses and not educational facilities, the City of Daly City is considered the Lead Agency for the project.

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1.3 FINAL EIR/RESPONSES TO COMMENTS

Following the conclusion of the 45-day public review period, the City of Daly City will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR text, as necessary;
- List of individuals and agencies commenting on the Draft EIR;
- Responses to comments received on the Draft EIR, in accordance with CEQA Guidelines (Section 15088);
- Copies of letters received on the Draft EIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. This Statement of Overriding Considerations must be included in the record of project approval.

1.3.1 Notice of Determination

If the project is approved, the City of Daly City will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office and available for public inspection for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

SECTION 2.0 PROJECT INFORMATION AND DESCRIPTION

2.1 PROJECT LOCATION

The approximately 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard in the City of Daly City (APN 091-211-230). The majority of the project site has a General Plan land use designation of C-O (Commercial – Office) and is zoned PD-31 (Planned Development District) while a smaller portion of the site in the northwest corner was rezoned to PD-31A for a faculty and staff housing project that has been constructed and now is occupied and has a General Plan land use designation of R-HD (Residential-High Density). Regional, vicinity, and aerial maps of the project site are provided in Figure 2.2-1, Figure 2.2-2, Figure 2.2-3, and Figure 2.2-4, respectively.

2.2 PROJECT DESCRIPTION

The project consists of two primary components: (1) development of a new approximately 22-acre Serramonte Del Rey Precise Plan (Precise Plan), and (2) a specific development proposal for the approximately 4.3-acre Parcel B within a portion of the new Precise Plan.

2.2.1 Precise Plan

A Precise Plan was approved in 1985 for an approximately 50-acre area that includes the project site and extends south to Hickey Boulevard. Phase I of the 1985 Precise Plan has already been built and includes the apartment buildings, Summit Shasta High School, and office buildings located south of the project site along Campus Drive (see Figure 2.2-3). Phase II of the 1985 Precise Plan would redevelop the approximately 22-acre project site up to 175 residential units and approximately 700,000 square feet of office space. The proposed Precise Plan would replace Phase II of the 1985 Precise Plan for the approximately 22-acre project site and would leave the original Precise Plan in place for the portion outside of the project site. The zoning and General Plan land use designation of the portion outside of the project site would also remain as-is.

This EIR provides project-level environmental review for the full buildout of the Precise Plan as described below. The City will review future project applications at the time specific development is proposed on each Parcel to ensure each proposed project is consistent with the development assumptions analyzed in this EIR. The new Precise Plan would allow for the redevelopment of the project site area with up to 1,235 units (which includes the existing 122 units on Parcel A) of affordable and market-rate rental housing, up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 2,400 square feet for a Head Start childcare facility), and infrastructure improvements throughout the project area. Compared to the existing approved plan, the proposal would result in a net increase of 1,060 residential units and the elimination of planned office space.[3] The new Precise Plan would require a General Plan Amendment from C-O (Commercial – Office) to C-MU (Commercial – Mixed Use). Table 2.2-1 below summarizes the proposed maximum development allowed per parcel, although the overall Precise Plan development totals would be as noted above, and less than the sum of what is possible on each parcel.

[3] The total residential units in the proposed Precise Plan is inclusive of the already approved faculty and staff housing project located on Parcel A. 1,235 units – 175 units = 1,060 units.

Table 2.2-1: Development Maximum Per Parcel		
Parcel Number	**Maximum Residential Units[1]**	**Maximum Retail/Commercial (square feet)[3]**
Parcel A[2]	122	0
Parcel B	210	8,000
Parcel C[5]	125	6,000[4]
Parcel D	270	6,000
Parcel E	330	6,000
Parcel F	400	6,000

1. Shows maximum residential units per parcel; however, the total amount of residential units across all parcels shall not exceed 1,235 units.

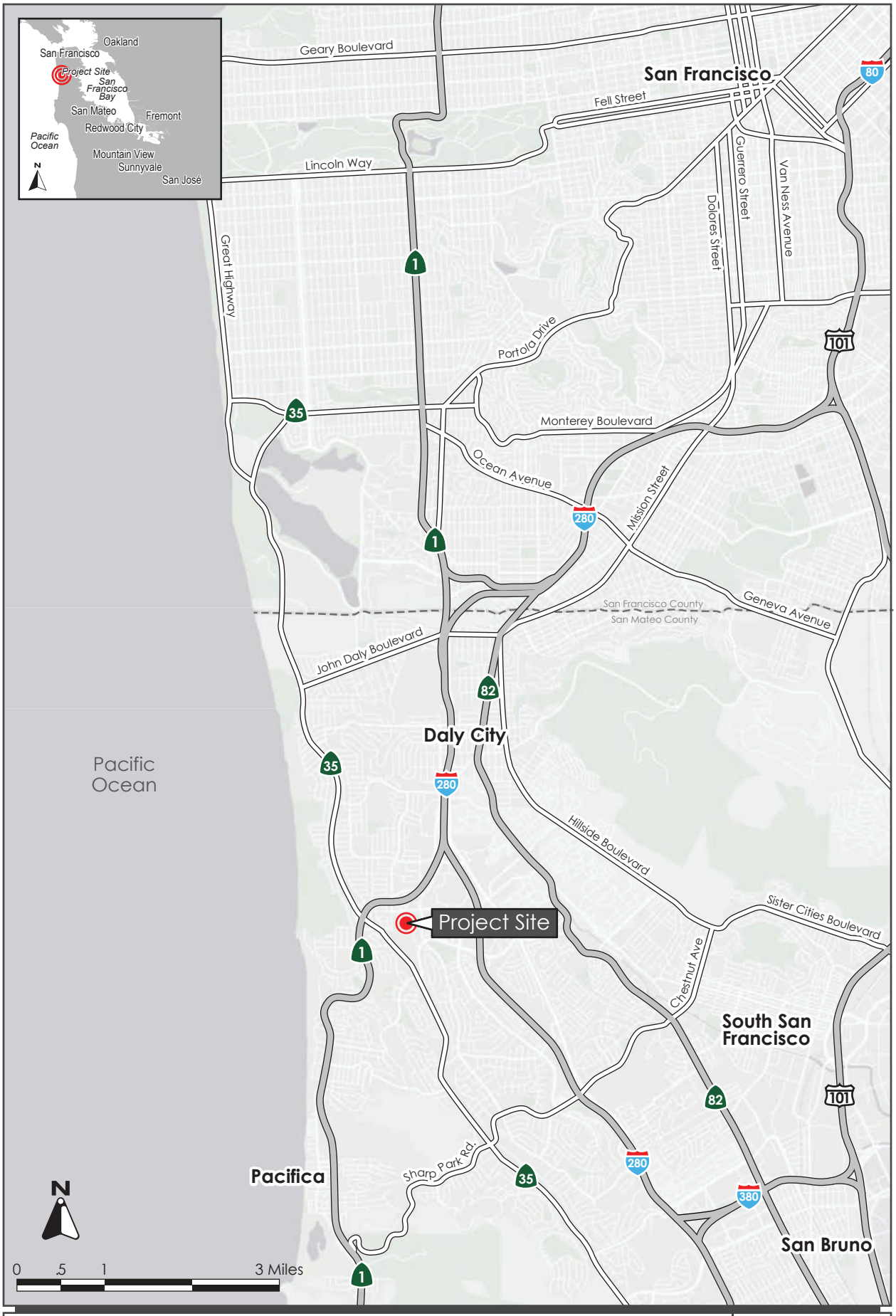
2. Parcel A has been constructed and occupied and was approved under a separate application

3. Parcels C-F may provide retail/commercial space in addition to the 8,000 square feet assumed for Parcel B; however, the total amount across all parcels shall not exceed 14,000 square feet

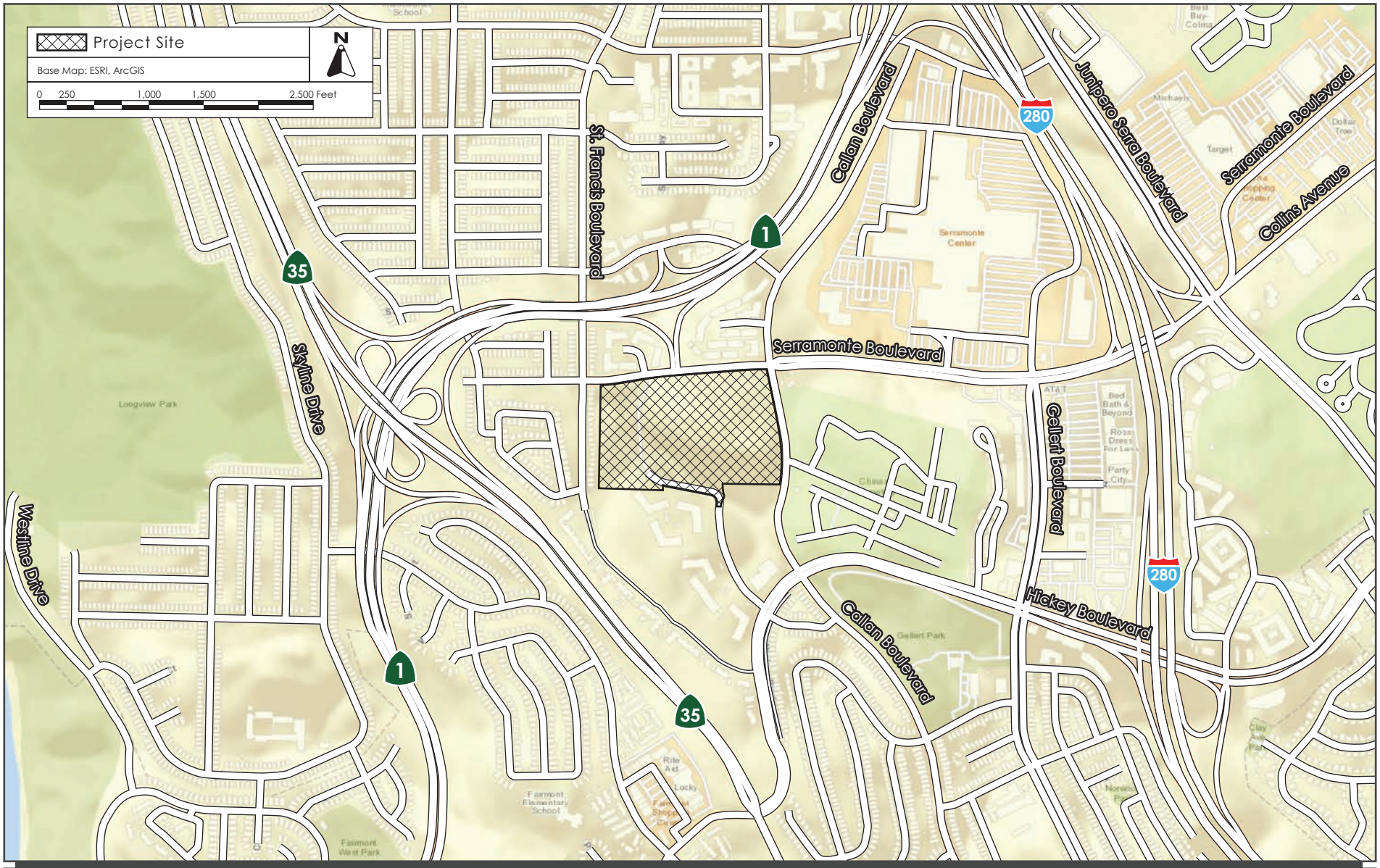
4. Parcel C is permitted to build up to 1,400 square feet of childcare facilities in addition to the overall retail/commercial square footage

5. Parcel C would be subdivided into two parcels (C1 and C2)

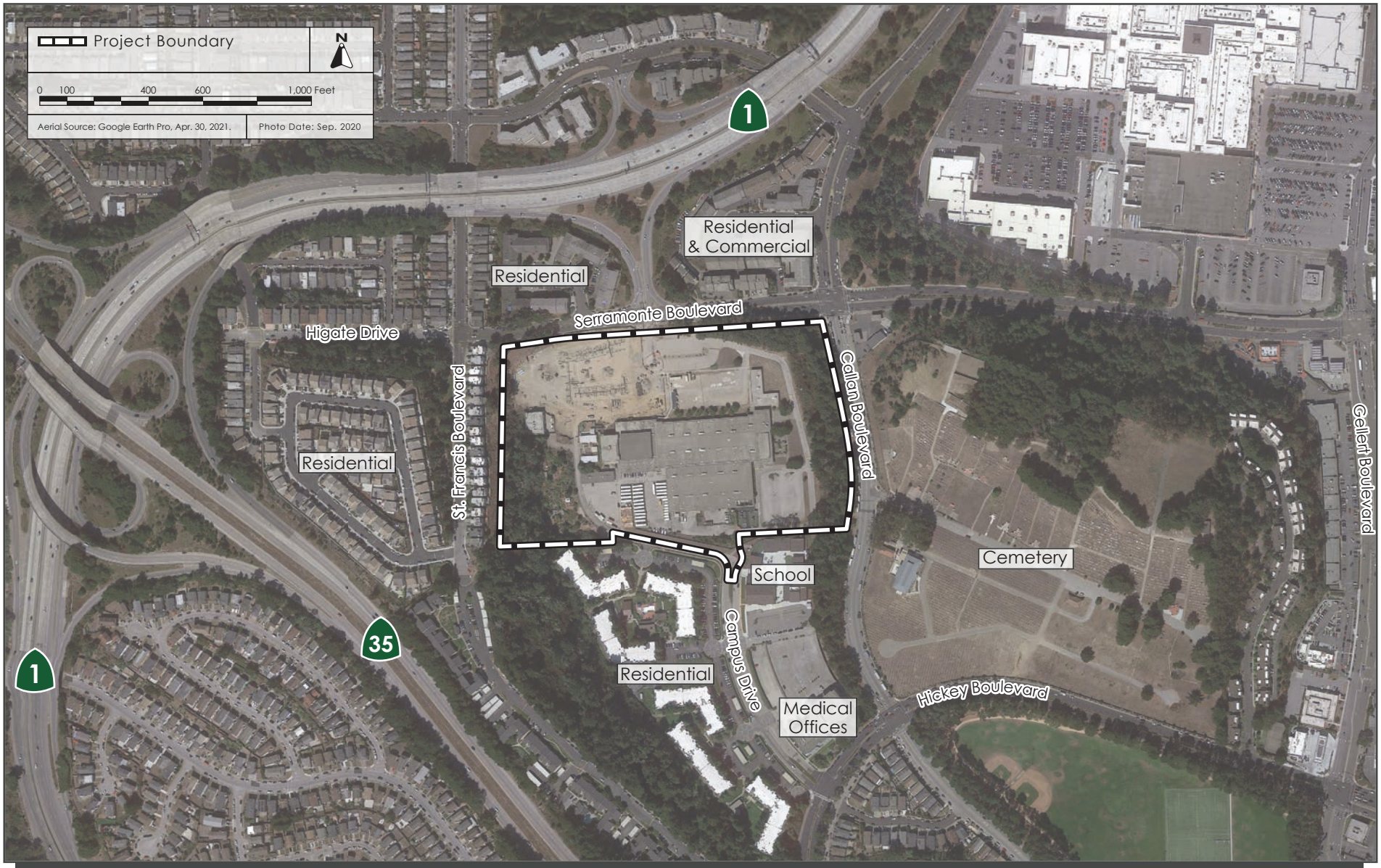
The proposed Precise Plan would divide the project site into six development parcels (with Parcel C further subdivided into two smaller parcels) and additional street parcels with public access easements (see Figure 2.2-5). Parcels A, B, and C would have maximum building heights of 77 feet, and Parcels D, E, and F would have a maximum building height of 150 feet. The 1985 Precise Plan allowed for 12-story building within the center of the project site, six-story buildings along the eastern property line, and 3.5-story buildings along the western property line. Build-out of the site and division of parcels is anticipated to be over an eight to 12 year period, but potentially up to 15 years. The proposed phasing for the Precise Plan is development of Parcel B first, followed by Parcels C and D, and finally Parcels E and F, although the phasing order may be adjusted by market conditions or other factors. The proposed Precise Plan would also establish a new Planned Development District, consistent with the City's Municipal Code Chapter 17.28. A copy of the proposed Precise Plan is included in Appendix B.



REGIONAL MAP | FIGURE 2.2-1

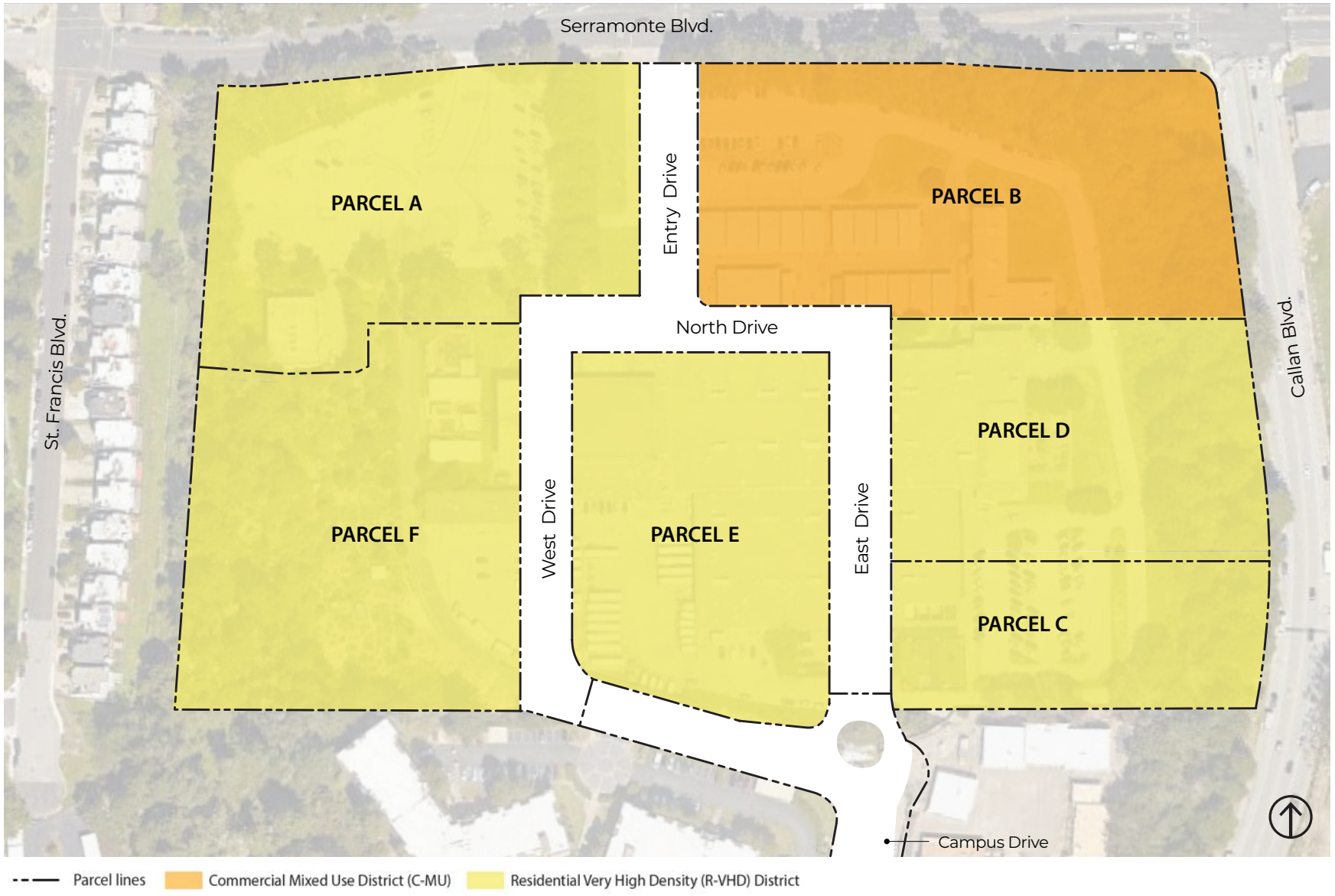


VICINITY MAP | FIGURE 2.2-2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.2-3

PRECISE PLAN BOUNDARY | FIGURE 2.2-4



PROPOSED PRECISE PLAN PARCELS | FIGURE 2.2-5

2.2.1.1 *Serramonte Del Rey Demonstration Garden*

There is an approximately 0.5-acre school demonstration garden located in the southwest corner of the Precise Plan area. This garden was started 20 years ago and used by JUHSD for adult education as a demonstration garden. In 2019, the garden was listed as a "community garden" by the County of San Mateo; however, the listing occurred without the knowledge or permission of JUHSD leadership, and therefore the garden was removed from the list. Since the garden is intended for use by JUHSD for educational purposes, JUHSD provides limited access for members of the public and is restricting hours of use during the interim period of campus utilization prior to the start of construction of Parcel B and the demolition of the existing high school building.

The proposed Precise Plan would remove the existing garden and use the space as a construction staging area until Parcel F is fully developed with up to 400 units and 6,000 square feet of retail uses. JUHSD is providing raised planter beds at their new adult education building located at 123 Edgemont Drive, which was approved by the JUHSD Board on August 17, 2021 (see Figure 2.2-6).

2.2.1.2 *Parcel A Development Project*

The JUHSD Faculty and Staff Housing project is constructed and occupied on Parcel A of the proposed Precise Plan. The Parcel A development project was approved by the City of Daly City in January 2020 and consists of four-story (48 feet), 122 multi-family units for JUHSD faculty, staff, and their families on an approximately 3.9-acre site (see Figure 2.2-7). While the Parcel A development project was approved under a separate application, the 122 residential units are included in the proposed Precise Plan's total unit count of 1,235.

2.2.2 **Parcel B Development Project**

The specific Parcel B development project would be located on the approximately 4.3-acre Parcel B, as shown in Figure 2.2-8. Parcel B is currently developed with surface parking and a one-story temporary education building in the southeast corner of the parcel.

The proposed development would demolish the existing building and surface parking on-site and construct a seven-story (up to 73.5 feet to top of parapet and 85 feet to top of elevator shaft, see Figure 2.2-9), mixed-use building with 201 residential units and approximately 8,000 square feet of retail space. The building would include two levels of parking (one level of below grade parking). The lower level of the parking garage would provide 212 parking spaces serving the residential units. An additional 133 parking spaces would be provided on the ground-floor, with 43 reserved for retail customers and leasing and the remainder reserved for residential parking.

2.2.2.1 *Site Access and Circulation*

Vehicular access to the Parcel B site would be provided via a new driveway and the existing entry drive on Serramonte Boulevard (see Figure 2.2-8). The new driveway would be located east of the existing entry drive and provide direct access to the lower parking level. An entry road would run north-south between Parcels A and B from the existing driveway along Serramonte Boulevard. An entrance to the proposed ground-floor parking (i.e. the upper level of the parking garage) would be located along this new road. A new road serving Parcels A and B would run west-east along the

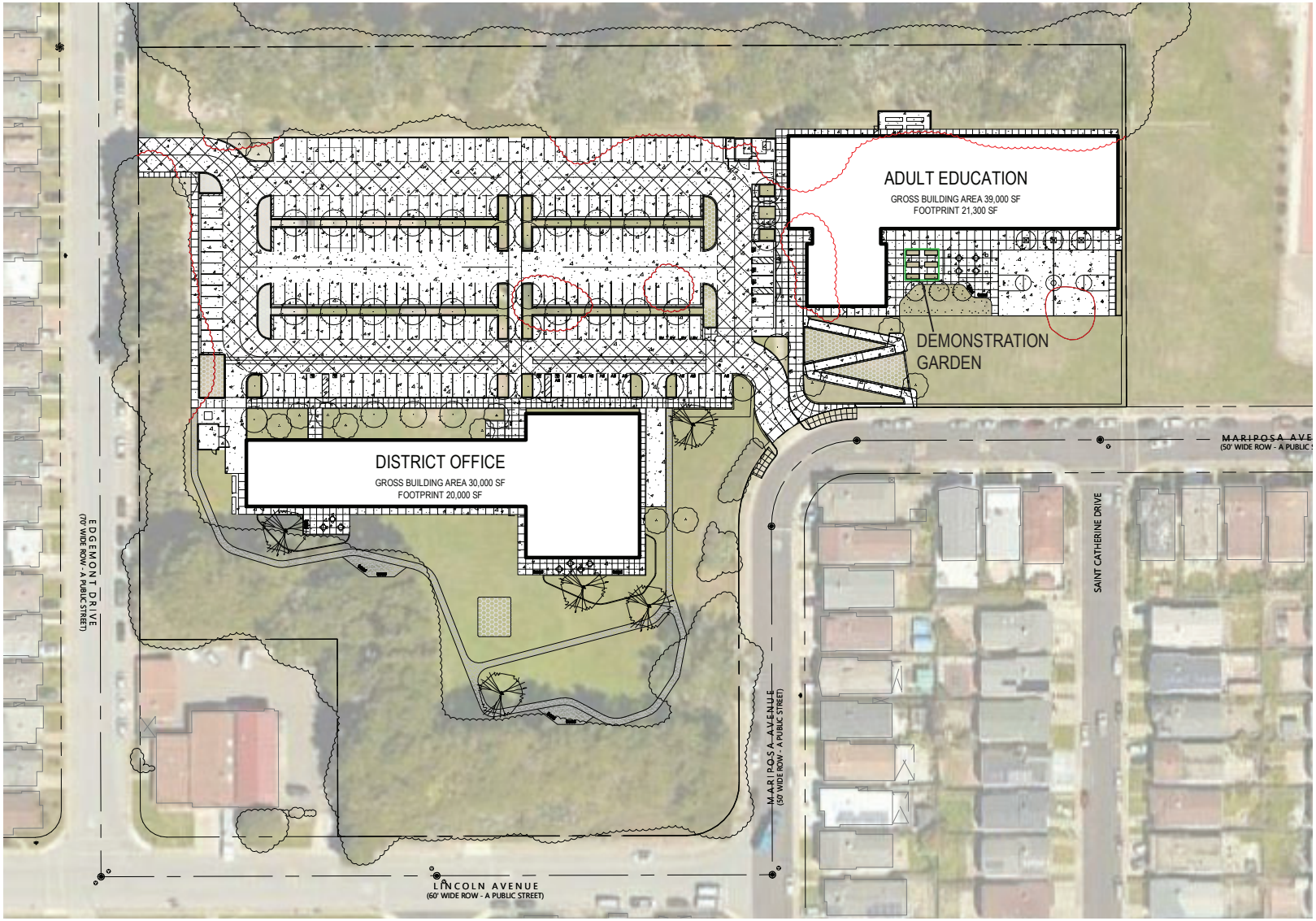
southern boundaries of Parcels A and B. A new multi-use pathway would be constructed around the perimeter of the proposed mixed-use building and Parcel B.

In addition to the proposed Parcel B development project's on-site transportation improvements (i.e., new roads, bike paths, and pedestrian paths), the City of Daly City and applicant are in discussions regarding potential additional transportation improvements that may be included in the project or possibly required as conditions of approval. Potential off-site improvements that the project may be required to construct include the following:

- Bicycle and pedestrian improvements on Campus Drive
- Serramonte Boulevard bicycle and pedestrian improvements
- Serramonte Boulevard/Highway 1 Traffic Signal
- Clarinada Avenue/Highway 1 Traffic Signal
- Sidewalk on Callan Boulevard
- Bicycle and pedestrian improvements within the proposed Precise Plan
- Improved access pathways to Gellert Park
- Serramonte Pavement Reconstruction
- Stormwater infrastructure

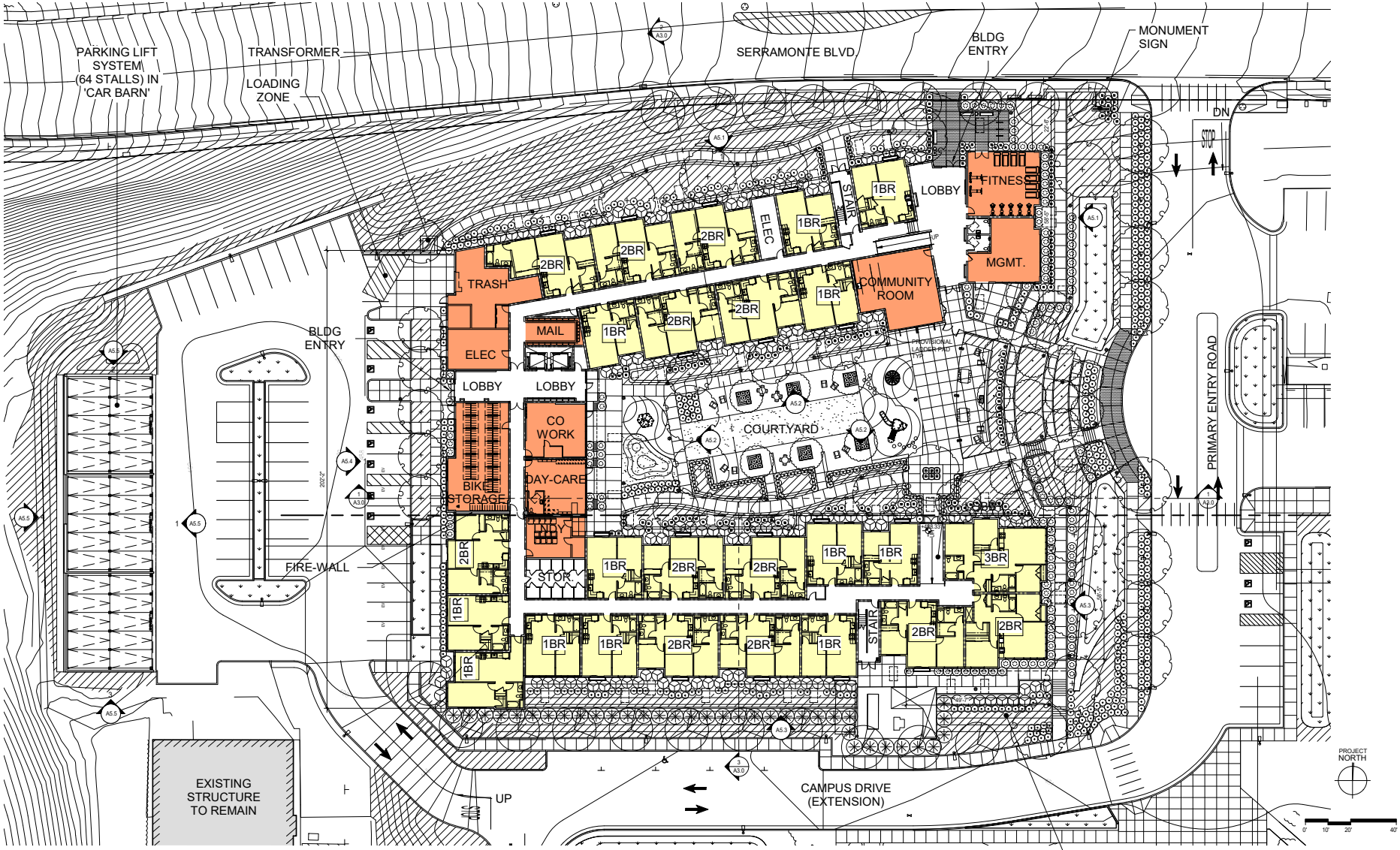
This EIR evaluates the potential implementation of the above improvements to ensure their environmental effects, if any, are disclosed and mitigated, where needed, to inform the City's decision whether to require some or all of the improvements to be implemented by the project. Any improvements ultimately to be implemented would be attached to the project as conditions of approval.

The development project would signalize the Serramonte Boulevard and project driveway intersection and add pedestrian improvements (i.e., crosswalks, pedestrian signals) to serve the future residents on Parcel B, as well as residents on constructed Parcel A. Intersections at St. Francis Boulevard/Serramonte Boulevard, St. Francis Boulevard/Callan Boulevard, Hickey Boulevard/Callan Boulevard, and Hickey Boulevard/Campus Drive would also be improved with new bike and pedestrian connections. New bike lanes and sidewalks would also be provided on Serramonte Boulevard along the project frontage and throughout the project site. Potential off-site improvements that the project may be required to construct in connection with Parcels C-F will be evaluated when they are identified and at the time the City completes the subsequent or supplemental environmental review pursuant to Guidelines Section 15162.



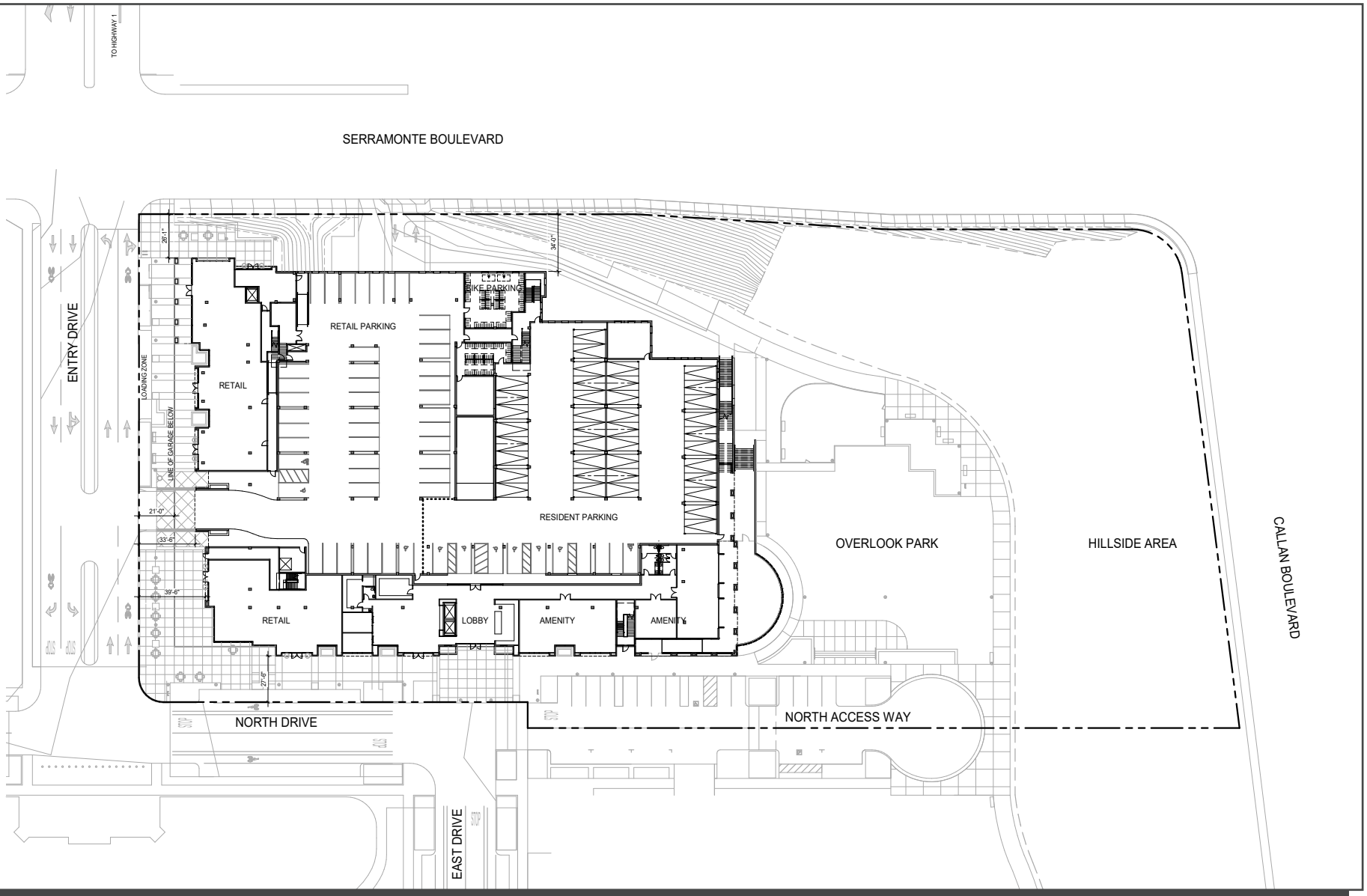
Source: HKIT Architects, March 4, 2021.

JUHSD DISTRICT OFFICE AND ADULT EDUCATION SITE PLAN | FIGURE 2.2-6



Source: Seidel Architects, June 14, 2019.

PARCEL A DEVELOPMENT PROJECT SITE PLAN | FIGURE 2.2-7



PARCEL B CONCEPTUAL SITE PLAN | FIGURE 2.2-8

SOUTH ELEVATION (NORTH DRIVE)

WEST ELEVATION (ENTRY DRIVE)

Source: Seidel Architects, April 21, 2021.

PARCEL B CONCEPTUAL BUILDING ELEVATIONS | FIGURE 2.2-9

2.2.2.2 *Open Space and Landscaping*

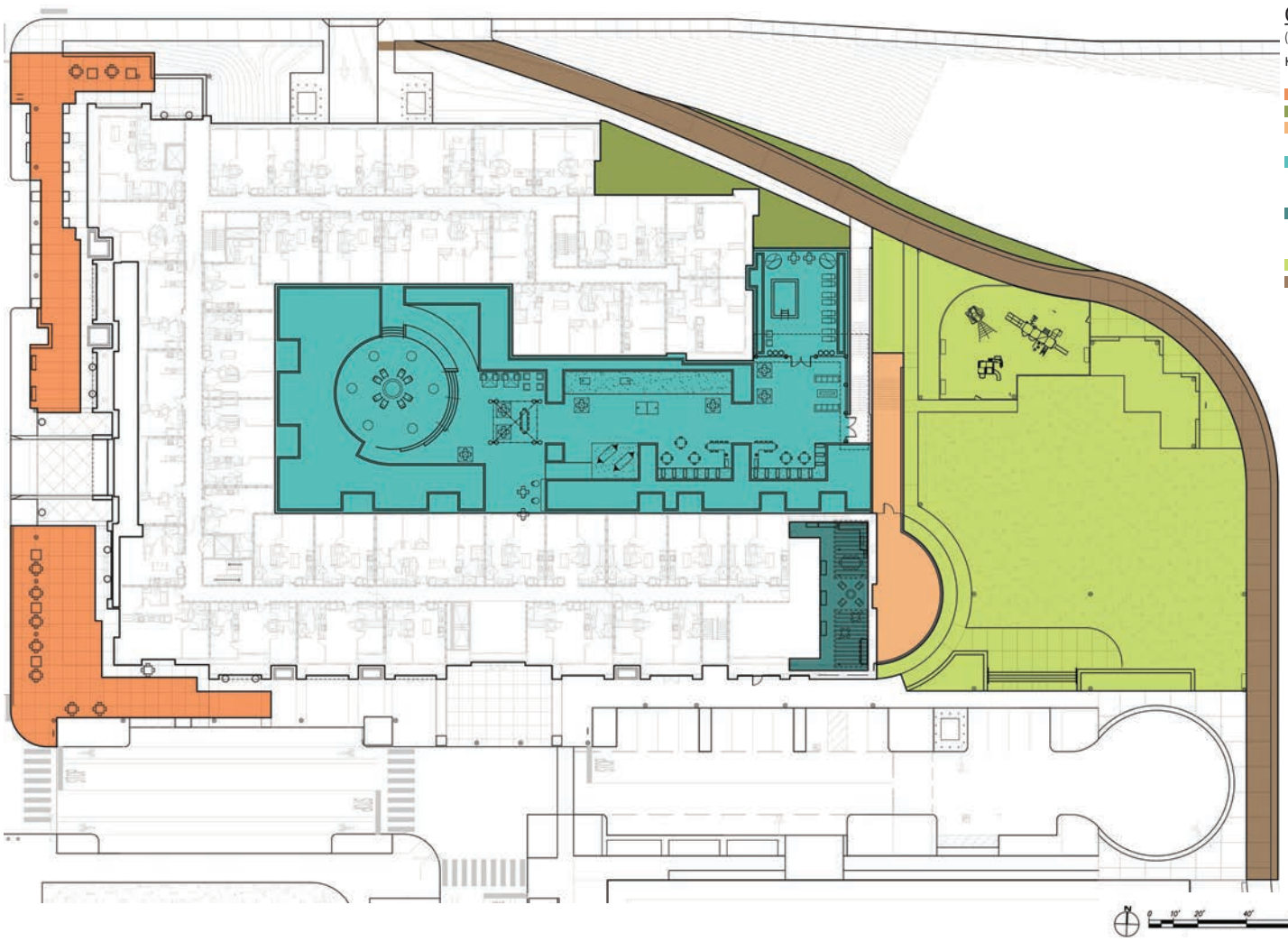
The proposed Parcel B development project would include three components of open space to be used by the public: 1) approximately 22,300 square-foot public park that would include a large grass area and playground; 2) the first phase of the recreational trail (approximately 6,800 square feet) that would be located in the southeast corner of Parcel B; and 3) open space for public use at the retail plaza (approximately 7,000 square feet) facing the new entry road (see Figure 2.2-10). Open space serving the residents of the building would include both the ground floor terrace and the roof terrace, up to 20 private balconies for individual units, and an approximately 20,300 square-foot courtyard located on the roof of the parking deck of the mixed-use building which includes amenities such as a hot tub, fire pit, lounge furniture, and an outdoor kitchen. The open space reserved for residential use plus the retail open space for public use at Parcel B would exceed the City's requirement for open space of 150 square feet per unit and is consistent with the proposed Precise Plan.

Parcel B currently contains limited landscaping consisting of grasses, shrubs, and trees within the existing surface parking lot and adjacent to the existing education building. Mature trees are located along the perimeter of Parcel B to the north and east. The proposed development would preserve the mature trees along the perimeter of Parcel B and replace the trees that are determined to be in poor condition by a certified arborist. The project proposes to plant 82 new trees throughout the project site.

2.2.2.3 *Utility, Drainage, and Off-Site Improvements*

The proposed Parcel B development project would connect to existing utilities within Serramonte Boulevard and the Precise Plan area itself. The Parcel B development project would connect to an existing 10-inch sanitary sewer line within Serramonte Boulevard and a 10-inch water line along the southern edge of Parcel B.

Stormwater would be treated on-site with area drains, drop inlets, manholes, bioretention areas, and below-grade pipes, before being discharged to a 24-inch storm drain line in Serramonte Boulevard. The project would treat stormwater before entering the city's storm drain system. In addition, an infiltration gallery is proposed to offset an increase in runoff generated from the proposed development.



OPEN SPACE SUMMARY

(SEE ARCHITECTURE DRAWINGS FOR INDIVIDUAL BALCONY AREAS)

KEY	NAME	AREA	LEVEL
	RETAIL PLAZA	7,050 SF	GROUND FLOOR
	LANDSCAPE (<10%)	2,673 SF	GROUND FLOOR
	TERRACE	2,764 SF	GROUND FLOOR
	2ND FLOOR BALCONIES	504 SF	2ND FLOOR/PODIUM
	COURTYARD	20,353 SF	2ND FLOOR/PODIUM
	3RD FLOOR BALCONIES	504 SF	3RD FLOOR
	5TH FLOOR BALCONIES	779 SF	5TH FLOOR
	ROOF TERRACE	1,346 SF	6TH FLOOR
	SUBTOTAL	**35,973 SF**	
	PARK (<10%)	22,335 SF	GROUND FLOOR
	TRAIL	6,854 SF	GROUND FLOOR
	SUBTOTAL	**29,189 SF**	
	TOTAL	**65,162 SF**	

PARCEL B CONCEPTUAL OPEN SPACE PLAN | FIGURE 2.2-10

2.2.2.4 *Construction Schedule*

Construction of the proposed Parcel B development project is expected to last approximately 24 months. As noted previously, full build out of the entire Precise Plan would take approximately eight-12 years, but could take up to 15 years. The proposed Parcel B development project would result in a net export of approximately 33,220 cubic yards (cy) of soil; however, the development project is proposing to store that soil on-site for use during development of the rest of the Precise Plan (i.e., Parcels C through F).

2.3 PROJECT OBJECTIVES

- Advance an innovative land use master plan to attract investment, stabilize District finances, increase funding for student education and attract and retain highly qualified teachers and staff.
- Permit development consistent with the City's General Plan that enables redevelopment of underutilized properties with higher-density, transit supportive development that facilitates bicycle and pedestrian access along an established, highly utilized transit corridor, as outlined in the 2020 Walk Bike Daly City Master Plan.
- Create a pedestrian scale neighborhood with an attractive public realm of park and outdoor spaces, inviting to the surrounding community and people of all ages.
- Maximize the number of new high-quality market-rate and affordable housing units as a well-designed, economically feasible, urban residential neighborhood with sufficient density to create a safe, active neighborhood, with development phasing subject to market conditions that provides flexibility with the sequence of construction of buildings, open space, streets, and infrastructure.
- Create opportunities to connect people with nature through open space design, a new recreational trail and immediate proximity to wooded hillside areas.
- Encourage alternative transportation with safe on- and off-street bike routes and pedestrian-oriented urban design that encourages bicycle, pedestrian, and transit access to, from and through the site.
- Design traffic-calmed residential streets for low volume, slow vehicle access between the intersection of Highway 1 and Serramonte Boulevard and the existing Campus Drive south of the Plan Area.

2.4 USES OF THE EIR

This EIR provides decision makers in the City of Daly City, CalTrans (as a responsible agency) and the general public with environmental information to use in considering the proposed project. It is intended that this EIR be used for the discretionary approvals necessary to implement the project, as proposed. These discretionary actions may include, but are not limited to, the following:

City Actions
<u>Precise Plan</u>

- General Plan Amendment
- Planned Development Rezoning and Permit

- Major Subdivision
- Design Review for future development projects

Parcel B Development Project

- Design Review Permit

Ministerial permits would subsequently be obtained from the City, which could include demolition permits, grading permits, and building permits, in order to complete the projects and construct necessary infrastructure improvements, including any off-site improvements.

Caltrans Actions

- Encroachment Permit

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

3.1	Aesthetics	3.11	Land Use and Planning
3.2	Agriculture and Forestry Resources	3.12	Mineral Resources
3.3	Air Quality	3.13	Noise
3.4	Biological Resources	3.14	Population and Housing
3.5	Cultural Resources	3.15	Public Services
3.6	Energy	3.16	Recreation
3.7	Geology and Soils	3.17	Transportation
3.8	Greenhouse Gas Emissions	3.18	Tribal Cultural Resources
3.9	Hazards and Hazardous Materials	3.19	Utilities and Service Systems
3.10	Hydrology and Water Quality	3.20	Wildfire

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.
- **Cumulative Impacts** – This subsection discusses the project's cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts "when the project's incremental effect is cumulatively considerable." The discussion does not need to be in as great detail as is necessary for project impacts, but is to be "guided by the standards of practicality and reasonableness." The purpose of the cumulative analysis is to allow decision makers to better understand the

impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)). This EIR uses the list of projects approach.

The analysis must determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

Table 3.0-1 identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis.

Table 3.0-1: Cumulative Projects List

Name	Address	Description	Status
Serramonte Shopping Center Expansion – Northwest Quadrant	3 Serramonte Center, Daly City	70,000 sq. ft. Cinema, 75,000 sq. ft. Hotel, 28,000 sq. ft. Retail, 12,000 sq. ft. Restaurants	Approved
Serramonte Shopping Center Expansion – Northeast Quadrant	3 Serramonte Center, Daly City	Two drive-through restaurants (5,100 sq. ft. and 2,100 sq. ft.)	Under Construction
Seton Medical Center Expansion	1900 Sullivan Avenue, Daly City	Four hospital buildings totaling 433,385 sq. ft. of new hospital space. Overall net increase of 200,385 sq. ft. of building space	Under Construction
Serramonte Condominiums	525-595 Serramonte Boulevard, Daly City	323 total units - 17-story 133-unit 170,164 GSF condo building and two 13-story 95-unit 181,806 GSF condo buildings	Approved
Serramonte Hotel	525-595 Serramonte Boulevard, Daly City	12-story, 176-room 153,886 GSF hotel	Approved

For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 3.0-2 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 3.0-2: Geographic Considerations in Cumulative Analysis

Resource Area	Geographic Area
Aesthetics	Project site and adjacent parcels
Agriculture and Forestry Resources	Countywide
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Project site and adjacent parcels
Cultural Resources	Project site and adjacent parcels
Energy	Energy provider's territory
Geology and Soils	Project site and adjacent parcels
GHGs	Planet-wide
Hazards and Hazardous Materials	Project site and adjacent parcels
Hydrology and Water Quality	Colma Creek watershed
Land Use and Planning/Population and Housing	Citywide
Minerals	Identified mineral recovery or resource area
Noise and Vibration	Project site and adjacent parcels
Public Services and Recreation	Citywide
Transportation/Traffic	Citywide
Tribal Cultural Resources	Project site and adjacent parcels
Utilities and Service Systems	Citywide
Wildfire	Within or adjacent to the wildfire hazard zone

3.1 AESTHETICS

3.1.1 Environmental Setting

3.1.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and, among other changes, SB 743 specifies that aesthetic impacts of qualifying transit oriented developments are not considered significant impacts on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and
2. The project is located on an infill site within a transit priority area.[4]

The exemption for aesthetic impacts does not include impacts to historic or cultural resources, however. In addition, local governments retain their ability to regulate a project's transportation, aesthetics, and parking impacts outside of the CEQA process.

Scenic Highways Program

The California Scenic Highway Program is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highway Code, Sections 260 through 263. There are three eligible State scenic highways within the City of Daly City, although none are officially designated; Skyline Boulevard (State Route (SR) 35), Cabrillo Highway (SR 1), and Junipero Serra (I-280).

Local

Daly City 2030 General Plan

The City of Daly City General Plan includes a Visual Quality section under the Resources Management Element. General Plan policies and tasks relevant to the project with regards to aesthetics are listed below.

[4] An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." A "transit priority area" is defined as "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: Office of Planning and Research. "Changes to CEQA for Transit Oriented Development – FAQ." October 14, 2014. Accessed: August 24, 2021. http://www.opr.ca.gov/ceqa/updates/sb-743/transit-oriented.html.

Policy/Task	Description
Task CE-20.7	As a part of all new development, require, where appropriate, the provision of pedestrian-oriented signs, pedestrian-scaled lighting, benches, and other street furniture so as to make non-motorized forms of travel comfortable and attractive alternatives to the automobile. Where necessary in new development, the City may require additional sidewalk and/or right-of-way width to accommodate these amenities.
Policy LU-16	Regulate the size, quantity, and location of signs to maintain and enhance the visual appearance of Daly City.
Policy RME-20	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly.
Task RME-20.4	Incorporate design features in new development that reflect the character of the neighborhood, to ensure that new construction is compatible with existing development.
Policy LU-17	Ensure that private development is responsible for providing any on-or off-site improvements related to and/or mitigating the impacts it causes.

3.1.1.2 *Existing Conditions*

Project Site

The 22-acre project site is located on the south side of Serramonte Boulevard between the intersections of Callan Boulevard/Serramonte Boulevard and St. Francis Boulevard/Serramonte Boulevard (see Figure 2.2-3). The northwest corner of the project site (Parcel A) is developed with the Jefferson Union High School District (JUHSD) Faculty and Staff Housing project. The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units (see Photo 1). The southwest corner of the project site is developed with the JUHSD demonstration garden (see Photo 2). The remainder of the project site it developed with surface parking lots and a one- to two-story concrete building that serves as the existing JUHSD district office and adult education buildings (see Photo 3). The project site meets the definition of an infill site per SB 743.

Surrounding Visual Character

The project site is surrounded by residential development to the north, northeast, south, and west. The residences to the north and northeast are two- to three-story apartment buildings made of stucco and wood construction. The residences to the south (Serramonte Ridge Apartment Homes) are three- to four-story apartment buildings also made of stucco and wood construction. The residences to the west are two-story, single-family homes made of wood construction (see Photo 4).

Southeast of the project site is the Summit Shasta High School, which is developed with one- to two-story concrete education buildings (see Photo 4). East of the project site across Callan Boulevard is a Chinese cemetery consisting of mostly open space and gravestones.

Photo 1: View from Serramonte Boulevard looking south.

Photo 2: View of Demonstration Garden looking northwest.

PHOTOS 1 & 2

Photo 3: View of administration building looking north.

Photo 4: View looking south of project site down Campus Drive.

PHOTOS 3 & 4

Scenic Vistas and Resources

San Bruno Mountain reaches approximately 1,000 feet in elevation and is visible from various locations throughout the City, including the project site, which is about a 2.6 miles southwest of San Bruno Mountain. Views of the coastline are not visible from the project site. The project site is comprised of surface parking lots and commercial buildings and no scenic resources, such as rock outcroppings or historic buildings (refer to Section 4.5 Cultural Resources), are present on the site or in the project area, other than numerous mature trees. The project site is not visible from any state or County designated scenic highways or roadways.

Locations within a Transit Priority Area

The project site is located within a transit priority area as defined in SB 743. The Serramonte Shopping Center bus stop, and the multiple bus lines serving that location, qualifies as a major transit stop and the project site is within one-half mile (see Figure 3.1-1).

3.1.2 Impact Discussion

For the purpose of determining the significance of the project's impact on aesthetics, except as provided in Public Resources Code Section 21099, would the project:

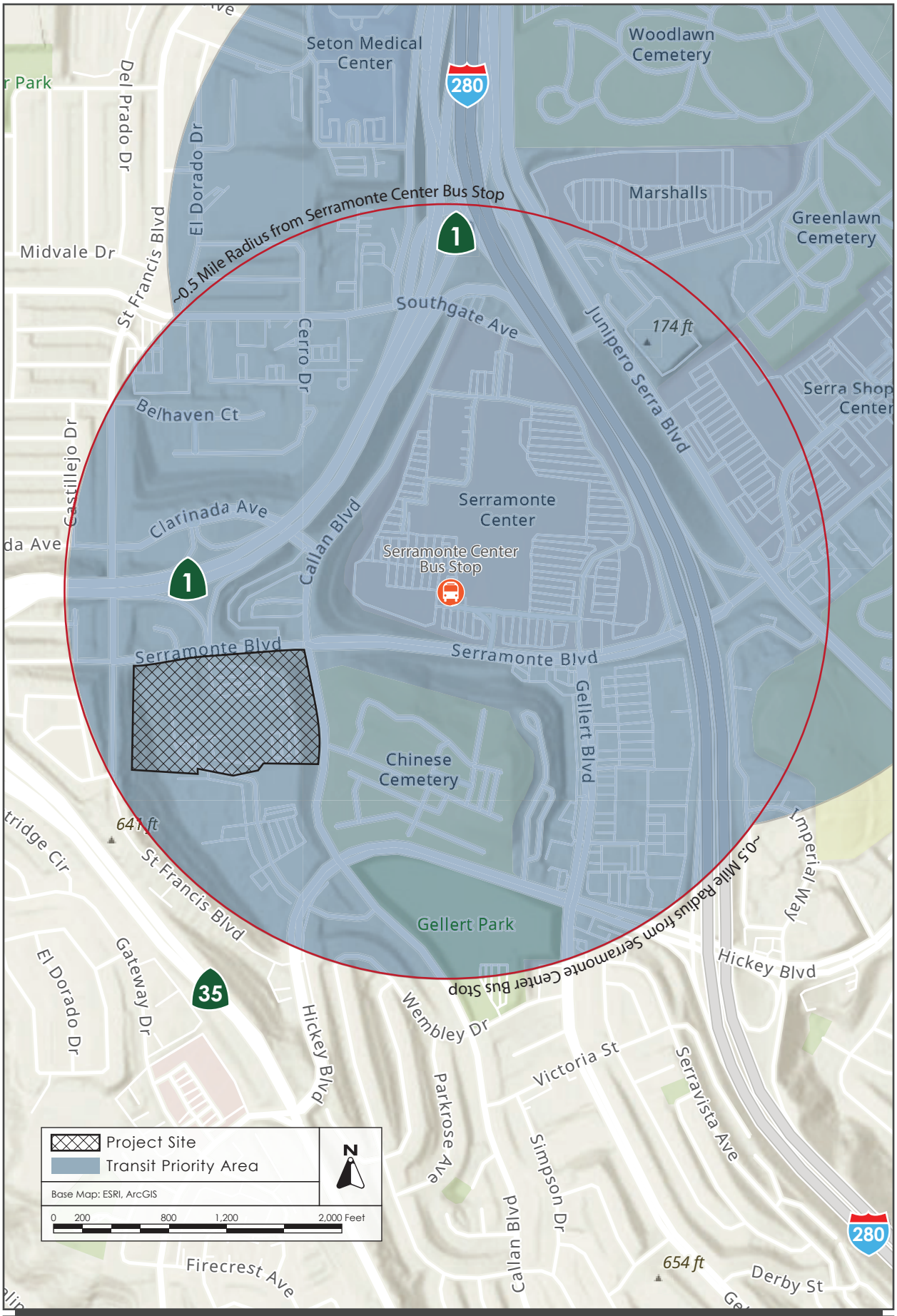
1) Have a substantial adverse effect on a scenic vista?
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[5] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

3.1.2.1 *Project Impacts*

Impact AES-1:	The project would not have a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**

Implementation of the project would result in changes to the built environment; however, the proposed project would consist of mixed-use residential land uses and is located on an infill site within a transit priority area. Pursuant to SB 743 (Public Resources Code section 21099[d][1]) "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area shall not be considered significant impacts on the environment;" therefore, the aesthetics impacts of the project are not considered significant. **(Less than Significant Impact)**

[5] Public views are those that are experienced from publicly accessible vantage points.



TRANSIT PRIORITY AREA | FIGURE 3.1-1

3.1.2.2 *Cumulative Impacts*

Impact AES-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant aesthetics impact. **(Less than Significant Cumulative Impact)**

Precise Plan and Parcel B Development Project

By statute, the project's aesthetic impacts, individually and cumulatively, are deemed less than significant, see Impact AES-1 discussion above. **(Less than Significant Cumulative Impact)**

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Environmental Setting

3.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[6]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[7]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[8] Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.[9]

3.2.1.2 *Existing Conditions*

The approximately 22-acre project site is not used for agricultural or timberland purposes. A demonstration garden is located in the southwest corner of the project site (see Photo 2); however, this garden is not considered an agricultural resource under CEQA as it does not meet the definition

[6] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed December 6, 2021. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[7] California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.
[8] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[9] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed December 6, 2021. http://frap.fire.ca.gov/.

of agricultural land.[10] Surrounding land uses include residences to the north, west, and south, a shopping mall to the northeast, and a cemetery and park to the east. The San Mateo County Important Farmlands 2018 Map designates the project site as "Urban and Built-Up Land", defined as land with at least six structures per 10 acres. Common examples of "Urban and Built-Up Land" are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses. The site is not under a Williamson Act contract and there are no existing agricultural or forestry resources on or in the vicinity of the site.

The project site is zoned as a Planned Development. A Planned Development district allows various types of development such as neighborhood shopping centers, professional and administrative areas, commercial service centers, industrial parks, single-family, multi-family residential, or a combination of any of the above-mentioned uses.

3.2.2 Impact Discussion

For the purpose of determining the significance of the project's impact on agriculture and forestry resources, would the project:

1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
4) Result in a loss of forest land or conversion of forest land to non-forest use?
5) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

3.2.2.1 *Project Impacts*

Impact AG-1:	The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. **(No Impact)**

As discussed under Section 3.2.1.2, the project site is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. **(No Impact)**

[10] Agricultural land is means prime farmland, farmland of statewide importance, or unique farmland, as defined by the United States Department of Agriculture land inventory and monitoring criteria, as modified for California (California Public Resources Code Section 21060.1).

Impact AG-2:	The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **(No Impact)**

As discussed under Section 3.2.1.2, the project site is neither zoned for agricultural use or under a Williamson Act contract; therefore, the proposed project would not conflict with zoning for agricultural uses or a Williamson Act contract. **(No Impact)**

Impact AG-3:	The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

As discussed under Section 3.2.1.2, the project site is not zoned as timberland or forest land. For this reason, the project would have not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

Impact AG-4:	The project would not result in a loss of forest land or conversion of forest land to non-forest use. **(No Impact)**

See response to Impact AG-3. **(No Impact)**

Impact AG-5:	The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. **(No Impact)**

See responses to Impact AG-1 through Impact AG-4. In addition, as discussed above in Section 3.2.1.2 Existing Conditions, the demonstration garden on the project site is not considered an agricultural resource and its removal would not result in a significant impact. The school district, however, is providing a substitute demonstration garden at their new district offices next to Westmoor High School (see Section 2.2.1.1 for more details). **(No Impact)**

3.2.2.2 *Cumulative Impacts*

Impact AG-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact. **(No Cumulative Impact)**

As discussed above, the implementation of the proposed project would not impact agricultural, forestry, and/or timberland; therefore, implementation of the project would not contribute to a cumulative impact to those resources. **(No Cumulative Impact)**

3.3 AIR QUALITY

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2022, is attached to this EIR as Appendix C.

3.3.1 Environmental Setting

3.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O_3), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.[11] Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health effects are summarized in Table 3.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 3.3-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O_3 levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to

[11] The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants

TACs are a broad class of compounds known to have health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[12] Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

3.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O_3, CO, SO_x, NO_x, and lead.

[12] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed December 6, 2021. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, the plan involves application of emission control strategies to existing diesel vehicles and equipment to reduce DPM (in additional to other pollutants). Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment (including off-road equipment), will significantly reduce emissions of DPM and NO_X.

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.[13]

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

[13] BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

Local

Daly City 2030 General Plan

The Daly City 2030 General Plan (General Plan) includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to air quality and are applicable to the proposed project.

Policy/Task	Description
Policy RME-5	Assess projected air emissions from new development and associated construction and demolition activities in conformance with the BAAQMD CEQA Guidelines, and relative to state and federal standards.
Task RME-5.1	Amend the Planning Division's development review procedures to include a formal step that would help identify how a development project can incorporate design or functional changes that will minimize air quality impacts.
Task RME-5.3	Consider cumulative air quality impacts consistent with the region's Clean Air Plan and State law.
Task RME-5.4	Require the preparation of a Transportation Systems Management plan for new development that has been determined to contribute to a reduction in location air quality.
Task RME-5.5	Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.
Policy RME-6	Minimize exposure of residents to objectionable smoke and odors by proactively regulating potential sources.
Task RME-6.2	Require new residential development projects and projects categorized as sensitive receptors to be located an adequate distance from facilities that are existing and potential sources of odor. An adequate separate distance will be determined based upon the type, size and operations of the facility.

3.3.1.3 *Existing Conditions*

The project is located in San Mateo County, which is in the San Francisco Bay Area Air Basin. The project area's proximity to both the Pacific Ocean and the San Francisco Bay has a moderating influence on the climate. The Bay Area is considered a nonattainment area for ground-level O_3 and $PM_{2.5}$ under both the federal Clean Air Act and state Clean Air Act. The area is also considered in nonattainment for PM_{10} under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3 and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$, and apply to both construction period and operational period impacts.

The northwest corner of the project site (Parcel A) has been developed with the Jefferson Union High School District (JUHSD) Faculty and Staff Housing project. The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSD demonstration garden. The remainder of the project site it developed with surface parking lots and a one- to two-story concrete

building that serves as the existing JUHSD district office and adult education buildings. The nearest sensitive receptors to the project site are single- and multi-family residences adjacent the west and south, across Serramonte Boulevard to the north, and the Summit Shasta High School adjacent to the south.

3.3.2 Impact Discussion

For the purpose of determining the significance of the project's impact on air quality, would the project:

1) Conflict with or obstruct implementation of the applicable air quality plan?
2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
3) Expose sensitive receptors to substantial pollutant concentrations?
4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.3.2.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based, to the extent possible, on scientific and factual data. The City of Daly City has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 3.3-2 below.

Table 3.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	**Construction Thresholds**	**Operation Thresholds**	
	Average Daily Emissions (pounds/day)	**Average Daily Emissions (pounds/day)**	**Annual Average Emissions (tons/year)**
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 µg/m^3	0.8 µg/m^3 (average)	

3.3.2.2 *Project Impacts*

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan**. (Less than Significant Impact)**

The proposed project will not conflict with the latest Clean Air planning efforts since; (1) the project's operational emissions would be well below the BAAQMD thresholds of significance for air pollutants as discussed below in Impact AIR-2 and development of the project site would be considered urban infill. **(Less than Significant Impact)**

Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. **(Less than Significant Impact with Mitigation Incorporated)**

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate emissions from construction and operation of the project. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The model output from CalEEMod along with construction and operational inputs can be found in Appendix C.

BAAQMD is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin. As previously stated, BAAQMD's most recently adopted plan is the 2017 CAP. The primary goals of the 2017 CAP are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate. The BAAQMD has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality impacts. In formulating compliance strategies, BAAQMD relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which in turn affects region-wide emissions of air pollutants and GHGs.

The 2017 CAP includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the 2017 CAP. As shown in Table 3.3-3 below, the proposed project would generally be consistent with the 2017 CAP measures to reduce automobile trips, as well as energy and water use.

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures

Control Measure	Project Consistency with Measure Intent
Transportation Measures	
TR2 - Trip Reduction Programs: Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	**Consistent:** The project is required to implement a Transportation Demand Management (TDM) program (see mitigation measure MM TRN-2.1) to reduce vehicle miles traveled by at approximately three percent. The program measures could include, but are not limited to, carpool incentives, carshare memberships, additional last-mile services, and vanpools. The project sites are also in proximity to regional transit.
TR8 - Ridesharing, Last-Mile Connection: Promote carpooling and vanpooling by providing funding to continue regional and local ridesharing programs, and support the expansion of carsharing programs. Provide incentive funding for pilot projects to evaluate the feasibility and cost-effectiveness of innovative ridesharing and other last-mile solution trip reduction strategies. Encourage employers to promote ridesharing and carsharing to their employees.	
TR9 - Bicycle and Pedestrian Access and Facilities: Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent:** As discussed in Section 3.17 Transportation, the existing bicycle and pedestrian facilities provide adequate access to the project site. The project would construct additional bicycle/pedestrian facilities

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures	
Control Measure	**Project Consistency with Measure Intent**
	as part of the project and include bicycle parking facilities on-site.
TR13 - Parking Policies: Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing in high-traffic areas.	**Consistent:** The project proposes a lower parking supply than required by the City's Municipal Code (see Section 3.17.3). In addition, as required by mitigation measure MM TRN-2.1, the project shall implement TDM measures to promote alternatives to single-occupancy vehicle trips.
Building Measures	
BL1 - Green Buildings: Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the California Green Building Standards Code (CALGreen; Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent:** The project would be constructed consistent with CALGreen and Title 24 requirements.
BL2 - Decarbonize Buildings: Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	**Consistent:** Electricity is provided to the site by Peninsula Clean Energy (PCE). PCE customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources

Table 3.3-3: Project Consistency with Applicable 2017 BAAQMD CAP Control Measures	
Control Measure	**Project Consistency with Measure Intent**
Waste Management Measures	
WA4 - Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	**Consistent:** The project shall recycle and/or salvage for reuse a minimum of 60 percent of nonhazardous construction and demolition waste, consistent with Chapter 15.64, Recycling and Diversion of Construction and Demolition Debris of the City's Municipal Code.
Water Measures	
WR2 - Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	**Consistent:** The project would be constructed consistent with CALGreen and Title 24 requirements, which require incorporation of water conservation measures.

As described above in Table 3.3-3, the project would be consistent with the applicable 2017 CAP control measures by reducing project generated trips, including bicycle parking facilities on-site, complying with CALGreen and Title 24, using 100 percent carbon free electricity, and recycling. The project, therefore, would not conflict with or obstruct the implementation of the 2017 CAP.

At the project-level, there are no consistency measures or thresholds. The proposed project would not conflict with the latest Clean Air planning efforts because the project would have operational emissions below the BAAQMD thresholds and would be an urban infill development.

Construction Period Emissions

CalEEMod provided annual emissions for construction including both on-site and off-site construction activities for full buildout of the proposed Precise Plan. Construction emissions were based on land use, construction start dates, and soil hauling information provided by the applicant to then generate CalEEMod default equipment and schedule information for a project of this type and size per phase. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. As noted previously in the Project Description, full build out of the entire Precise Plan would take approximately eight-12 years, but could take up to 15 years. However, for purposes of the air quality analysis, the project construction schedule and equipment usage assume the project would be constructed over a period of six years (1,110 workdays). In disclosing construction air quality impacts, it is more conservative to evaluate a shorter construction period, since compressing the total construction activity into a shorter period of time results in higher daily emissions than if the project were built over a longer period of time, so assuming six years rather than eight to 12 years would overstate the construction emissions. The project's average daily emissions were computed by dividing the total construction emissions by the number of construction days.

Table 3.3-4 shows average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project.

Table 3.3-4: Average Daily Construction Period Emissions - Unmitigated				
Year	**ROG (lbs./day)**	**NO_X (lbs./day)**	**PM_{10} (lbs./day)**	**$PM_{2.5}$ (lbs./day)**
2023 (130 workdays)	2.03	18.60	0.92	0.75
2024 (209 workdays)	18.62	15.99	0.79	0.64
2025-2026 (304 workdays)	2.03	16.63	0.80	0.63
2027 (126 workdays)	48.07	12.66	0.65	0.49
2028 (219 workdays)	2.17	16.46	0.87	0.63
2029 (122 workdays)	**81.00**	13.27	0.74	0.52
BAAQMD Thresholds (lbs./day)	**54**	**54**	**82**	**54**
Exceed Threshold?	**Yes (2029)**	No	No	No

As shown in Table 3.3-4 above, the project would generate significant levels of average daily ROG (ROG is primarily emitted from architectural coatings) in 2029 during construction. Additionally, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices (BMPs) are implemented to reduce these emissions.

Mitigation Measures: The project will be required to implement the following mitigation measures to reduce reactive organic gas (ROG) and fugitive dust generation to a less than significant level:

MM AIR-2.1: BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times a day and at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content shall be verified by lab samples or moisture probe.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using a wet power vacuum street sweeper at least once per day. The use of dry power sweeping shall be prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries.
- Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to sensitive receptors. Wind breaks should have at maximum 50 percent air porosity.
- Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site.
- Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.

MM AIR-2.2: Selection of Construction Equipment: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards PM (PM_{10} and $PM_{2.5}$), if feasible, otherwise,

- Use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to

California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices that altogether achieve a 50-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).

- Use of electrical or non-diesel fueled equipment.

Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater. Elements of the plan could include a combination of some of the following measures:

- Implementation of Tier 4 or alternatively fueled equipment,
- Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors,
- Use of electrically-powered equipment,
- Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
- Change in construction build-out plans to lengthen phases, and
- Implementation of different building techniques that result in less diesel equipment usage.

Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

MM AIR-2.3: Low Volatile Organic Compound (VOC) Coating: The project shall use low volatile organic compound or VOC (i.e., ROG) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 50 percent of all residential and nonresidential interior paints and 50 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 50 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used.

MM AIR-2.1 through MM AIR-2.3 would reduce ROG emissions by 50 percent, to 40.74 lbs./day, resulting in ROG emissions below the BAAQMD threshold. Therefore, with implementation of MM-AIR-2.1 through MM-AIR-2.3, project construction would not exceed BAAQMD's thresholds of significance.

Operational Period Emissions

Operational period emissions from full buildout of the proposed Precise Plan would be generated primarily from vehicles driven by future residents, employees, customers, and vendors.[14] Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are also typical emissions from these types of uses. The proposed project also would include four 750-kilowatt (kW) diesel-fueled emergency generators. The emergency generators would be tested periodically and would power the proposed buildings in the event of a power failure. For modeling purposes, it was assumed that the generators would be operated primarily for testing and maintenance purposes. CARB and BAAQMD requirements limit these engine operations to 50 hours each per year of non-emergency operation. During testing periods, the engine would typically be run for less than one hour. CalEEMod was used to estimate emissions from operation of the proposed project. As discussed in Section 3.17 Transportation, the proposed project would implement a Transportation Demand Management (TDM) plan to achieve a three percent reduction in vehicle miles traveled (VMT); therefore, mobile emissions were reduced by three percent to reflect the effectiveness of the TDM plan. A summary of the calculated annual operational emissions is provided in Table 3.3-5, below. It was assumed that the earliest year of full project buildout and operation would occur in 2030 (in the event full buildout occurs later in time beyond 2030, emissions would be even lower as fuel efficiency gains would further reduce emissions), and as individual parcels are built and occupied, emissions would remain below the table values presented below.

Table 3.3-5: Unmitigated Operational Period Emissions

Scenario	ROG	NO_X	PM_{10}	$PM_{2.5}$
2022 Existing Emissions	1.02	0.49	0.65	0.17
2030 Project Operational Emissions (tons/year)	10.83	2.94	6.81	1.78
2030 Net Project Operational Emissions (tons/year)	9.81	2.44	6.16	1.60
BAAQMD Thresholds (tons/year)	**10**	**10**	**15**	**10**
Exceed Threshold?	No	No	No	No
2030 Net Project Operational Emissions (lbs./day)[1]	53.77	13.38	33.76	8.79
BAAQMD Thresholds (lbs./day)[1]	**54**	**54**	**82**	**54**
Exceed Threshold?	No	No	No	No
[1]Assumes 365-day operation				

As shown in Table 3.3-5, above, the project would not exceed annual or daily BAAQMD significance thresholds during project operation. **(Less than Significant Impact with Mitigation Incorporated)**

[14] Vehicle trips from the already built Parcel A project were included in the operational analysis to accurately reflect full buildout of the proposed Precise Plan.

Impact AIR-3:	The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**

This project would introduce new sources of TACs during construction (i.e., on-site construction activity and truck hauling emissions) and operation (i.e., emergency diesel generators). Sensitive receptors within the project vicinity include residences to the south, west, and north of the project site and the Summit Shasta High School adjacent to the southern boundary of the project site.

Construction Toxic Air Contaminants

Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. Community risk impacts were addressed by predicting increased cancer risk, the increase in annual $PM_{2.5}$ concentrations and computing the Hazard Index (HI) for non-cancer health risks. The maximally exposed individual (MEI) for construction cancer risk was determined to be located on the first floor at a multi-family residence across Serramonte Boulevard north of the project site (see Figure 3.3-1). The maximum annual $PM_{2.5}$ concentration from construction was shown to occur on the first floor at the Summit Shasta High School, adjacent to the southern boundary of the project (as seen in Figure 3.3-1) and was estimated to be 0.29 $\mu g/m^3$. Table 3.3-6 summarizes the community health risk impacts associated with project construction.

Table 3.3-6: Construction Risk Impacts at Off-Site MEI

Source		Cancer Risk (per million)[1]	$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]	Hazard Index [2]
Most Affected Residential Receptor				
Project Construction	Unmitigated	**19.28 (infant)**	0.15	0.01
	Mitigated[3]	3.33 (infant)	0.05	<0.01
BAAQMD Single-Source Threshold		**10**	**0.3**	**1.0**
Exceed Threshold?	Unmitigated	**Yes**	No	No
	Mitigated	No	No	No
Most Affected Student Receptor – Summit Shasta High School				
Project Construction	Unmitigated	**11.96 (child)**	0.29	0.02
	Mitigated	2.13 (child)	0.11	<0.01
BAAQMD Single-Source Threshold		**10**	**0.3**	**1.0**
Exceed Threshold?	Unmitigated	**Yes**	No	No
	Mitigated[3]	No	No	No

1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure.

2. Maximum annual concentration for any year.

3. Assumes implementation of mitigation measures MM AIR-2.1 and MM AIR-2.2.

Source: Illingworth & Rodkin, Inc., June 17, 2022.

LOCATION OF OFF-SITE RECEPTORS, MEIS, AND PROPOSED EMERGENCY GENERATORS | FIGURE 3.3-1

As shown in Table 3.3-6, unmitigated project construction would exceed the BAAQMD single-source threshold for cancer risk at the residential and student MEI. However, implementation of MM AIR-2.1 and MM AIR-2.2 would reduce the project's cancer risk impacts to less than significant levels. Both the unmitigated and mitigated maximum annual $PM_{2.5}$ concentration and HI value from project construction would not exceed their respective BAAQMD single-source thresholds.

The community health risk impacts summarized in Table 3.3-6 are based on the proposed construction phasing of developing Parcel B first, followed by Parcels C and D, and finally Parcels E and F (see Section 2.2.1 Precise Plan). Any deviations from this phasing could result in different community health risk impacts than analyzed in this EIR. If construction phasing were to change during buildout of the proposed Precise Plan, the project would be required to implement the following mitigation measure.

Mitigation Measures: The project will be required to implement the following mitigation measure if construction phasing changes in order to confirm community health risk impacts are reduced to a less than significant level:

MM AIR-3.1: Prior to the issuance of a grading permit, the applicant shall provide the City with the most recent construction phasing schedule by parcel for buildout of the proposed Precise Plan. If the most recent construction phasing schedule increases the number of units per construction phase compared to the construction phasing assumed in the air quality analysis of this EIR, the applicant shall prepare an updated community health risk assessment to confirm that the new phasing will not result in any new or more significant air quality impacts not previously disclosed in this EIR. The updated community health risk assessment shall be reviewed and approved by the Director of Community Development or Director's designee.

Operational Toxic Air Contaminants

As previously stated, operation of the full buildout of the Precise Plan would have long-term emissions from the proposed emergency generators and project generated traffic. Figure 3.3-1 shows the proposed locations of the generators throughout the project site. The MEI for project operation was determined to be the same as the construction MEI for cancer risk and $PM_{2.5}$. CalEEMod was used to calculate the health risk impacts from the emergency generators and CalTrans version of the EMFAC2017 emissions model was used to calculate health risk impacts from project generated traffic. The results are summarized in Table 3.3-7 below.

Table 3.3-7: Operational Risk Impacts at Off-Site MEI

Source	Cancer Risk (per million)[1]	$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]	Hazard Index [2]
Most Affected Residential Receptor			
Project Traffic	0.48 (child)	0.10	<0.01
Emergency Generators	1.37 (child)	<0.01	<0.01

Table 3.3-7: Operational Risk Impacts at Off-Site MEI			
Source	**Cancer Risk (per million)[1]**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]**	**Hazard Index [2]**
Unmitigated Project Total	1.85 (child)	0.1	0.01
BAAQMD Single-Source Threshold	**10**	**0.3**	**1.0**
Exceed Threshold?	No	No	No
Most Affected Student Receptor – Summit Shasta High School			
Project Traffic	0.26 (child)	0.11	<0.01
Emergency Generators	0.09 (child)	<0.01	<0.01
Unmitigated Project Total	0.35 (child)	0.11	0.02
BAAQMD Single-Source Threshold	**10**	**0.3**	**1.0**
Exceed Threshold?	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure. 2. Maximum annual concentration for any year.			

As shown in Table 3.3-7, the proposed emergency generators and project generated traffic would not exceed BAAQMD single-source thresholds at the location of the MEI. Additionally, diesel engines are subject to CARB's Stationary Diesel Airborne Toxics Control Measure and the proposed generator would require permits from the BAAQMD since it would be larger than 50 horsepower. As part of the BAAQMD permit requirements for toxics screening analysis, the engine emissions will have to meet Best Available Control Technology for Toxics and pass the toxic risk screening level of less than ten in a million. The risk assessment would be prepared by the BAAQMD. Depending on results, the BAAQMD would set limits for DPM emissions (e.g., more restrictive engine operation periods). Sources of air pollutant emissions complying with all applicable BAAQMD regulations generally will not be considered to have a significant air quality community risk impact.

Combined Project Toxic Air Contaminants

As shown in Table 3.3-6 and Table 3.3-7 above, unmitigated project construction would exceed the BAAQMD single-source threshold for cancer risk at the residential and student MEI and unmitigated operational emissions would not exceed BAAQMD single-source thresholds. Table 3.3-8 summarizes the mitigated cancer risks, annual $PM_{2.5}$ concentrations, and HI values associated with construction and operation of the proposed project.

Table 3.3-8: Combined Mitigated Risk Impacts at Off-Site MEI			
Source	**Cancer Risk (per million)[1]**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]**	**Hazard Index [2]**
Most Affected Residential Receptor			
Construction (Years 0 – 6)[3]	3.33 (infant)	0.05	<0.01

Table 3.3-8: Combined Mitigated Risk Impacts at Off-Site MEI			
Source	**Cancer Risk (per million)[1]**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]**	**Hazard Index [2]**
Traffic (Years 3 – 30)	0.48 (child)	0.10	<0.01
Emergency Generators (Years 3 – 30)	1.37 (child)	<0.01	<0.01
Mitigated Project Total	5.18 (infant)	0.10	0.01
BAAQMD Single-Source Threshold	**10**	**0.3**	**1.0**
Exceed Threshold?	No	No	No
Most Affected Student Receptor – Summit Shasta High School			
Construction (Years 0 – 6) [3]	2.13 (child)	0.11	<0.01
Traffic (Years 3 – 9)	0.26 (child)	0.11	<0.01
Emergency Generators (Years 3 – 9)	0.09 (child)	<0.01	<0.01
Mitigated Project Total	2.48 (child)	0.11	<0.01
BAAQMD Single-Source Threshold	**10**	**0.3**	**1.0**
Exceed Threshold?	No	No	No

1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure.

2. Maximum annual concentration for any year.

3. Assumes implementation of mitigation measures MM AIR-2.1 and MM AIR-2.2.

As shown in Table 3.3-8, with implementation of MM AIR-2.1 and MM AIR-2.2, cancer risks would be reduced to less than significant levels. Both the unmitigated and mitigated annual $PM_{2.5}$ concentration and HI value from construction and operation activities would not exceed the single-source significance thresholds.

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute a cumulatively considerable contribution to a significant cumulative regional criteria pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. As stated in the 2017 BAAQMD CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect. **(Less than Significant Impact with Mitigation Incorporated)**

Impact AIR-4:	The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **(Less than Significant Impact)**

The project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors. However, they would be localized and not likely to adversely affect people off-site by resulting in confirmed odor complaints. Occupancy of the residential buildings and the ground floor retail spaces would not generate odors that would result in complaints. There were no identified odor sources that would affect the project in terms of generating frequent odor complaints. **(Less Than Significant Impact)**

3.3.2.3 *Cumulative Impacts*

Impact AIR-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Cumulative Exposure of Sensitive Receptors

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of the project site (i.e., influence area). These sources include railroads, freeways or highways, busy surface streets, and stationary sources identified by BAAQMD. A review of the project area indicated that State Route (SR) 1, SR 35 (Skyline Boulevard), Callan Boulevard, Hickey Boulevard, and Serramonte Boulevard have an average daily traffic (ADT) over 10,000 vehicles per day. Other nearby streets all have ADT less than 10,000 vehicles and are not considered sources of TACs. Additionally, a review of the BAAQMD's Permitted Stationary Sources 2018 GIS website map indicates there is one stationary source within the project site's 1,000-foot influence area. Table 3.3-9 shows the project and cumulative community risk impacts at the off-site MEI. The off-site MEI is the same as those identified under Impact AIR-3 above.

Table 3.3-9: Cumulative Community Risk Impacts at Off-Site MEI

Source		Cancer Risk (per million)[1]	$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]	Hazard Index [2]
Project[3]	Unmitigated	**21.13**	0.29	0.02
	Mitigated	5.18	0.11	<0.01
State Route 1 & 35		5.71	0.09	--
Callan Boulevard, ADT 13,950		0.29	0.02	<0.01
Hickey Boulevard, ADT 17,950		0.02	0.01	<0.01
Serramonte Boulevard, ADT 11,565		2.01	0.01	<0.01

Table 3.3-9: Cumulative Community Risk Impacts at Off-Site MEI				
Source		**Cancer Risk (per million)[1]**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)[2]**	**Hazard Index [2]**
KNK Petroleum Inc dba Triton Gas (Facility ID #111517, Gas Station), MEI at 325 feet		2.61	--	0.01
Cumulative Total	Unmitigated	31.77	0.42	<0.06
	Mitigated	15.82	0.24	<0.05
BAAQMD Cumulative-Source Threshold		**100**	**0.8**	**10.0**
Exceed Threshold?	Unmitigated	No	No	No
	Mitigated	No	No	No
1. Maximum assuming third-trimester fetus, infant, child exposure for construction and child/adult exposure during operation for 30-year exposure for residential receptors and 9-year exposure for student receptors. 2. Maximum annual concentration for any year. 3. Cancer risk MEI occurred at residential receptor to the north and $PM_{2.5}$ Concentration MEI occurred at high school receptor to the south.				

As shown in Table 3.3-9, the combined effect of all TAC sources in the project area (with implementation of MM AIR-2.1 and MM AIR-2.2) would be less than significant because the cumulative threshold of significance would not be exceeded. Thus, the project would not make a considerable contribution to a cumulative impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Daly City has policies (Policy RME-5) that address existing air quality conditions affecting a proposed project.

On-site Community Health Risk – New Project Residents

A health risk assessment was completed to analyze the impact of existing and new TAC sources (i.e., emergency diesel generator, project generated traffic) would have on the new proposed sensitive receptors (i.e., residents and daycare) that buildout of the proposed Precise Plan would introduce to the site. New sensitive receptors would be located in the proposed apartment buildings and daycare space. The on-site MEI was determined to be located on the west side of Parcel D. The same TAC sources discussed under Impact AIR-3 were used in this health risk assessment. A summary of this assessment is shown in Table 3.3-10.

Table 3.3-10: Cumulative Community Risk Impacts at On-Site MEI				
Source		**Cancer Risk (per million)**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)**	**Hazard Index**
Project	Unmitigated	**27.31**	**0.35**	0.02
	Mitigated	5.21	0.14	0.01
State Route 1 & 35		5.79	0.20	--
Callan Boulevard, ADT 13,950		0.23	0.03	<0.01
Hickey Boulevard, ADT 17,950		0.07	0.01	<0.01
Serramonte Boulevard, ADT 11,565		1.08	0.10	<0.01
KNK Petroleum Inc dba Triton Gas (Facility ID #111517, Gas Station), Project Site at 300 feet		3.09	--	0.01
BAAQMD Single-Source Threshold		**10**	**0.3**	**1.0**
Exceed Threshold?	Unmitigated	**Yes**	**Yes**	No
	Mitigated	No	No	No
Cumulative Total	Unmitigated	35.57	0.69	<0.06
	Mitigated	15.47	0.48	<0.05
BAAQMD Cumulative-Source Threshold		**100**	**0.8**	**10.0**
Exceed Threshold?	Unmitigated	No	No	No
	Mitigated	No	No	No

As shown in Table 3.3-10, the project construction sources' unmitigated cancer risk and $PM_{2.5}$ concentrations exceed the BAAQMD single-source thresholds, but the project and cumulative sources combined would not exceed the cumulative-source thresholds. With implementation of MM AIR-2.1 and MM AIR-2.2, cancer risk and $PM_{2.5}$ concentrations affecting future project residents due to project construction would be reduced to below the BAAQMD single-source thresholds, and no additional mitigation is needed to reduce cumulative health risks.

3.4 BIOLOGICAL RESOURCES

The following discussion is based, in part, on a Biological Resource Assessment (dated October 2021) prepared by Environmental Collective, a Wetland Assessment (dated February 13,2023) prepared by Hanson Bridgett, LLP, and a Biological Peer Review (dated May 2023) prepared by WRA Environmental Consultants. Copies of these reports are attached to this EIR as Appendix D, Appendix E, and Appendix F, respectively.

3.4.1 Environmental Setting

3.4.1.1 *Background Information*

Sensitive Natural Communities

Sensitive natural communities are natural community types considered to be rare or of a "high inventory priority" by the California Department of Fish and Wildlife (CDFW). Although sensitive natural communities have no legal protective status under the Federal Endangered Species Act (FESA) or California Environmental Species Act (CESA) (refer to Section 3.4.1.2 Regulatory Framework), they are provided some level of consideration under CEQA. Appendix G of the CEQA Guidelines identifies potential impacts on a sensitive natural community as one of six criteria to consider in determining the significance of a proposed project. While no thresholds are established as part of this criterion, it serves as an acknowledgement that sensitive natural communities are an important resource and, depending on their rarity, should be recognized as part of the environmental review process. The level of significance of a project's impact on any particular sensitive natural community will depend on that natural community's relative abundance and rarity.

Species of Special Concern

The CDFW maintains an administrative list of Species of Special Concern (SSC), defined as a "species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- Extirpated from the State, or, in the case of birds, in its primary seasonal or breeding role;
- Listed as federally, but not State-, threatened or endangered;
- Meets the State definition of threatened or endangered but has not formally been listed;
- Experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status;
- Has naturally, small populations exhibiting high susceptibility to risk from any factor(s) that, if realized, could lead to declines that would qualify it for State threatened or endangered status.

The CDFW's Nongame Wildlife Program is responsible for producing and updating SSC publications for mammals, birds, and reptiles and amphibians. Section 15380 of the CEQA Guidelines clearly indicates that SSC should be included in an analysis of project impacts if they can be shown to meet the criteria of sensitivity outline therein. In contrast to species listed under the federal ESA or CESA, however, SSC have no formal legal status.

The California Native Plant Society (CNPS) is a non-profit conservation organization dedicated to the preservation of native flora in California. The CNPS has been involved in assembling, evaluating, and distributing information on special-status plant species in the state, as listed in the Inventory of Rare and Endangered Plants of California. CNPS has recently updated their rating system for the rarity of special-status plants, and now include both a California Rare Plant Rank and a Threat Rank. CEQA requires government agencies to consider environmental impacts of discretionary projects and to avoid or mitigate them where possible. Under Section 15380, CEQA provides protection for both State-listed species and for any other species which can be shown to meet the criteria for State listing. The CDFW recognizes that special-status plants with a California Rare Plant Rank of 1A (Presumed extinct in California), 1B (Rare, threatened, or endangered in California and elsewhere), and 2 (Rare and endangered in California, but are more common elsewhere) in the CNPS Inventory consist of plants that, in a majority of cases, would qualify for listing and these species should be addressed under CEQA review. In addition, the CDFW recommends, and local governments may require, protection of species which are regionally significant, such as locally rare species, disjunct populations, essential nesting and roosting habitat for more common wildlife species, or plants with a CNPS California Rare Plant Rank of 3 (Plant species for which additional data is needed – a review list) and 4 (Plant species of limited distribution – a watch list).

3.4.1.2 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under federal and state Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the CDFW with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Clean Water Act

The United States Army Corps of Engineers (USACE) is responsible under Section 404 of the Clean Water Act to regulate the discharge of fill material into waters of the U.S. These waters, and their lateral limit, are defined in 33 CFR Part 328.3(a) and include streams that are tributaries to navigable waters and their adjacent wetlands. The lateral limits of jurisdiction for a non-tidal stream are measured at the line of the Ordinary High Water Mark (33 CFR Part 328.3[e]) or the limit of adjacent wetlands (33 CFR Part 328.3[b]). Any permanent extension of the limits of an existing water of the

U.S., whether natural or man-made, results in a similar extension of Corps jurisdiction (33 CFR Part 328.5).

Waters of the U.S. fall into two broad categories: wetlands and other waters. Other waters include waterbodies and watercourses generally lacking plant cover such as rivers, streams, lakes, springs, ponds, coastal waters, and estuaries. Wetlands are aquatic habitats that support hydrophytic wetland plants and include marshes, wet meadows, seeps, floodplains, basins, and other areas experiencing extended seasonal soil saturation. Seasonally or intermittently inundated features, such as seasonal ponds, ephemeral streams, and tidal marshes, are categorized as wetlands if they have hydric soils and support wetland plant communities. Seasonally inundated waterbodies or watercourses that do not exhibit wetland characteristics are classified as other waters of the U.S.

Waters and wetlands that cannot trace a continuous hydrologic connection to a navigable water of the U.S. are not tributary to waters of the U.S. These are termed "isolated wetlands." Isolated wetlands are jurisdictional when their destruction or degradation can affect interstate or foreign commerce (33 CFR Part 328.3[a]). The Corps may or may not take jurisdiction over isolated wetlands depending on the specific circumstances.

In general, a project proponent must obtain a Section 404 permit from the Corps before placing fill or grading in wetlands or other waters of the U.S. Prior to issuing the permit, the Corps is required to consult with the USFWS under Section 7 of the ESA if the project may affect federally listed species.

All Corps permits require water quality certification under Section 401 of the Clean Water Act. In the San Francisco Bay Area, this regulatory program is administered by the San Francisco Bay Regional Water Quality Control Board (RWQCB). Project proponents who propose to fill wetlands or other waters of the U.S. must apply for water quality certification from the RWQCB. The RWQCB has adopted a policy requiring mitigation for any loss of wetland, streambed, or other jurisdictional area.

Porter-Cologne Water Quality Control Act

Under this Act (California Water Code Sections 13000–14920), the RWQCB is authorized to regulate the discharge of waste that could affect the quality of the State's waters. The RWQCB asserts jurisdiction over isolated waters and wetlands, as well as waters and wetlands that are regulated by the Corps. Therefore, even if a project does not require a federal permit, it may still require review and approval by the RWQCB. When reviewing applications, the RWQCB focuses on ensuring that projects do not adversely affect the "beneficial uses" associated with waters of the State. In most cases, the RWQCB seeks to protect these beneficial uses by requiring the integration of waste discharge requirements (WDRs) into projects that will require discharge into waters of the State. For most construction projects, the RWQCB requires the use of construction and post-construction Best Management Practices (BMPs).

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. The taking and killing of birds resulting from an activity is

not prohibited by the MBTA when the underlying purpose of that activity is not to take birds.[15] Nesting birds are considered special-status species and are protected by the USFWS. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Fish and Game Code

The CDFW is also responsible for enforcing the California Fish and Game Code, which contains several provisions potentially relevant to construction projects. For example, Section 1602 of the Fish and Game Code governs the issuance of Lake and Streambed Alteration Agreements by the CDFW. Lake or Streambed Alteration Agreements are required whenever project activities substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake designated as such by the CDFW.

The Fish and Game Code also lists animal species designated as Fully Protected or Protected, which may not be taken or possessed at any time. The CDFW does not issue licenses or permits for take of these species except for necessary scientific research, habitat restoration/species recovery actions, or live capture and relocation pursuant to a permit for the protection of livestock. Fully protected species are listed in Sections 3511 (birds), 4700 (mammals), 5050 (reptiles and amphibians), and 5515 (fish) of the Fish and Game Code, while Protected amphibians and reptiles are listed in Chapter 5, Sections 41 and 42.

Several provisions in the California Fish and Game code provide for the protection of birds and bird nests in active use. Unless the Fish and Game Code (FGC) or its implementing regulations provide otherwise, under California law it is unlawful to:

- Take a bird, mammal, fish, reptile, or amphibian (FGC Section2000);
- Take, possess, or needlessly destroy the nest or eggs of any bird (FGC Section 3503);
- Take, possess, or destroy any bird of prey in the orders Strigiformes (owls) and Falconiformes (such as falcons, hawks and eagles) or the nests or eggs of such bird (FGC Section 3503.5);
- Take or possess any of the thirteen fully protected bird species listed in FGC Section 3511;
- Take any non-game bird (i.e., bird that is naturally occurring in California that is not a gamebird, migratory game bird, or fully protected bird) (FGC Section 3800);
- Take or possess any migratory non-game bird as designated in the MBTA or any part of such bird, except as provided by rules or regulations adopted by the DOI under the MBTA (FGC Section 3513);
- Take, import, export, possess, purchase, or sell any bird (or products of a bird), listed as an endangered or threatened species under the CESA unless the person or entity possesses an Incidental Take Permit or equivalent authorization from CDFW (FGC Section 2050 et seq.).

[15] United States Department of the Interior. "Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take." Accessed December 6, 2021. https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf.

- Non-native species, including European starling, house sparrow, and rock pigeon, are not afforded any protection under the MBTA or California Fish and Game Code.

Regional

San Bruno Mountain Habitat Conservation Plan

The San Bruno Mountain Habitat Conservation Plan (HCP) was executed as an Agreement in November 1982 with the US Fish and Wildlife Service, California Department of Fish and Game, County of San Mateo, the cities of Brisbane, Daly City and South San Francisco, and several private property owners. The HCP was created to provide for the indefinite perpetuation of the Mission blue butterfly and to protect habitat of the other Species of Concern. It includes the establishment of public ownership of sufficient habitat area to support the species as well as funding for the ongoing maintenance of the habitat. Funding is provided by limited development that was excluded from such habitat area and devoted to urban uses, including, among others, residential, community service, commercial and recreational uses.

Given that the San Bruno Mountain encompasses approximately 3,600 acres, with various ownerships and within various cities, the HCP presents a single unifying and coordinating document to provide protection, enhancement and funding for the entire San Bruno Mountain ecological community. The HCP provides for the perpetuation of conserved habitat areas through eradication of exotic species; re-vegetation with grassland species; effective yearly monitoring of the species of concern to control reintroduction of exotics; and patrol of the area to discourage destructive human activities.

Portions of three of the four HCP planning areas are located within the jurisdiction of Daly City (Saddle, Radio Ridge, and Guadalupe Hills). Within those areas, all designated development has been completed including Point Pacific, Village in the Park, South Hills Estates, Linda Vista, and Bay Ridge. All of this development resulted in a net gain of available habitat either through dedication, easements, or on-site restoration. Furthermore, all of these projects continue to contribute to a trust fund that is used to maintain and monitor the habitat in perpetuity.

The project site is approximately 1.5 miles southwest of the San Bruno HCP boundary.

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to biological resources and are applicable to the proposed project.

Policy/Task	Description
Policy LU-17	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.

Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Policy RME-16	The City shall continue to recognize the importance of the San Bruno Mountain HCP, uphold the integrity of the concepts behind the plan, and respect the agreements that serve to implement it.

Municipal Code Chapter 12.40 – Urban Forestry Ordinance

The Municipal Code provides regulations to optimize the use of trees and other landscaping within the city. Chapter 12.40 requires plans submitted to the City for the construction, repair, or alteration of any building, housing, or structure to include provisions for sufficient guards or protectors to prevent injury to any existing publicly owned trees, shrubs, flowers, or vines. It also imposes conditions regarding the displacement of public trees, where a comparable size tree shall be planted, or a fee is paid to the City to cover the cost of replacing a removed tree.

3.4.1.3 *Existing Conditions*

The project site is located within an urbanized area of Daly City and is developed with the JUHSD campus, which is situated on an artificial flat that was created when the sloping property was graded and developed in 1969. The area has been extensively disturbed by past development, with most of the graded portion of project site occupied by buildings and pavement. Trees and landscaping are scattered throughout the area. The slopes located on the western, northern, and eastern portions of the area are occupied by non-native Monterey pine (Pinus radiata) and Monterey cypress (Hesperocyparis macrocarpa) trees, with an understory of non-native grasses and forbs, ivy (Hedera spp.), periwinkle (Vinca major), ice plant (Delosperma sp.), poison oak (Toxicodendron diversilobum), sour grass (Oxalis pes-caprae), and other species. Grassland species consist of annual grasses and forbs such as wild oats (Avena spp.), bromes (Bromus spp.), cut-leaf geranium (Geranium dissectum), bristly ox-tongue (Helminthotheca echioides), and bindweed (Convolvulus arvensis), among others.[16]

Sensitive Natural Communities

No riparian, native grassland, valley oak woodland, or other sensitive natural communities are present within the project site. As mentioned in Section 2.2.1.1, there is a demonstration garden in the southwest portion of the site. As documented in Appendix D, although native plant species are present in the Demonstration Garden as a result of being planted by gardeners (refer to Figure 3.4-1 and Photo 2), no rare or threatened plant species were found on-site; therefore, the garden does not meet CDFW's definition of a sensitive natural community with special status under federal and state law (refer to Section 3.4.1.1 Environmental Setting and Section 3.4.1.2 Regulatory Framework). The project site is also occupied by two separate stands of native arroyo willow, including one located on the eastern slopes and another located to the south of the Demonstration Garden (refer to Figure 3.4-1).[17]

[16] A forb is a herbaceous flowering plant.

[17] Arroyo willow is considered a Facultative Wetland (FACW) species according to the National Wetland Plant List (NWPL) typically growing in riparian conditions indicative of available surface water. The NWPL is used by the

Source: Environmental Collaborative, July 14, 2021.

Biological Land Cover | FIGURE 3.4-1

Each stand is several hundred square feet in size and surrounded by non-native plantings and impervious surfaces. These stands are not indicative of riparian conditions since there are no natural drainages entering or leaving the willow stand locations, indicating they are likely formed by poor drainage following development of the property or irrigation runoff. This is particularly true for the willow stand located on the steep eastern slopes where water could not concentrate. Additionally, these willow stands are dominated by non-native upland species of grasses and shrubs, and are located in an area extensively disturbed by past development. Based on these facts, both the Biological Resources Assessment and Biological Peer Review (refer to Appendix D and Appendix F, respectively) concurred that these willow stands do not meet the definition of a sensitive natural community.

Special-Status Species

Special-status species are plants and animals that are legally protected under the Federal Endangered Species Act (FESA), California Endangered Species Act (CESA), or other regulations, and species that are considered sufficiently rare by the scientific community to qualify for such listing. For purposes of this analysis, special-status plant species include the following:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, rare, or a candidate species.
- Listed by the CNPS as California Rare Plant Rank (CRPR) 1A, 1B, 2, 3, or 4.

For purposes of this analysis, special-status wildlife species include the following:

- Listed under FESA as threatened, endangered, proposed threatened, proposed endangered, or a candidate species.
- Listed under CESA as threatened, endangered, or a candidate threatened or endangered species.
- Designated by the CDFW as a California species of special concern.
- Listed in the California Fish and Game Code as fully protected species (fully protected birds are provided in Section 3511, mammals in Section 4700, reptiles and amphibians in Section 5050, and fish in Section 5515).

Special Status Plants

No special-status plant species were observed on the project site during surveys conducted by Environmental Collective and WRA. None of the special-status plants known to occur in Daly City are mapped within the project site according to the California Natural Diversity Database (CNDDB). Suitable conditions for special-status plants are not present within the project site due to the extensive grading and development that the area has undergone, which precludes their occurrence within the area. While the Demonstration Garden includes some native plants planted by gardeners, none are classified as special-status.

Special-Status Wildlife

No special-status wildlife species were observed during the surveys conducted by Environmental Collective and WRA. Most special-status wildlife species known to occur in northern San Mateo County are associated with coastal salt marsh and riparian habitat, which are not present within the Precise Plan area. Due to a lack of larval host plant species or suitable habitat such as serpentine substrate or perennial aquatic habitat, special-status invertebrate species are unlikely to be present within the project site. The range of the western bumble bee, which is not a protected species under federal or state law but is being closely monitored due to declines in numbers and distribution over the past two decades, does not encompass the project site.

Bird nests of migratory bird species are protected under federal and state law (refer to Section 3.4.1.2 Regulatory Framework). No evidence of bird nests was observed during the aforementioned site visits, but suitable nesting habitat exists in the trees located along the project site perimeter.

There are no recorded occurrences of any special-status bat species within the project site and surrounding vicinity. However, trees and man-made building cavities, both of which are present on-site, are commonly used by bats, including the pallid bat (Antrozous pallidus) and Townsend's western big-eared bat (Corynorhinus townsendii), for roosting.

Jurisdictional Waters

As noted above under Sensitive Natural Communities, arroyo willow is typically found growing in riparian conditions indicative of available surface water, but may occur in non-wetlands. The arroyo willow stands are not connected to a natural drainage and have likely been supported by poor drainage following site development or irrigation runoff. Further, soils present at the willow stands lack redoximorphic features and do not meet the hydric soil criteria used to delineate wetlands.[18] Accordingly, both the Biological Resources Assessment and Biological Peer Review (refer to Appendix D and Appendix F, respectively) concurred that the willow stands do not meet the definition of a regulated wetland under federal and state law.

There is an approximately 865 square foot meadow located adjacent to the southwestern willow stand (see Photo 5 and Figure 3.4-1) that consists of facultative grasses including Italian ryegrass (Festuca perennis), bristly ox-tongue (Helminthotheca echioides), velvet grass (Holcus lanatus), annual beard grass (Polypogon monspeliensis), fringed willowherb (Epilobium ciliatum), and common rush (Juncus patens).[19] Soils present within this meadow exhibit redoximorphic features, and met hydric soil indicators. The meadow, however, is a result of deferred maintenance on the project site's drainage system and is not a naturally occurring wetland (see Appendix E and Appendix F); therefore, the meadow would not qualify as a jurisdictional wetland under the Clean Water Act or Porter-Cologne Act or as a sensitive natural community type.

[18] Redoximorphic features are color patterns soils that indicate periodic or regular saturation with water. Hydric soil is soil that has formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil.
[19] A facultative species is one that occurs in wetlands and non-wetlands.

Photo 5: View of meadow in southwest corner of the project site.

PHOTO 5

3.4.2 Impact Discussion

For the purpose of determining the significance of the project's impact on biological resources, would the project:

1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?
3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

3.4.2.1 *Project Impacts*

Impact BIO-1:	The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in Section 3.4.1.3 Existing Conditions, there are no known occurrences of special-status plants or wildlife within the project site. However, trees and buildings present on-site may provide suitable nesting and roosting habitat for protected and/or special-status birds and bats. The potential impacts of the project on these species are discussed below.

Special-Status Birds

As previously noted, trees located within and along the project site perimeter may provide nesting habitat for migratory birds as well as native nesting birds. If vegetation removal, demolition, and construction activities occur during the nesting season (February 1 through August 31), these activities could result in the destruction or abandonment of an active nest and loss of any eggs or younglings in the nest, which would constitute a significant adverse effect and a violation of the federal Migratory Bird Treaty Act and State Fish and Game code.

Mitigation Measures:

MM BIO-1.1:

- If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions.
- If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season.
- If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions.
- If active bird nests are found, an adequate setback shall be established by a qualified biologist, approved by the City Planning Division, around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated elsewhere on the site outside this zone.
- A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-1.1, the project's impact to birds nesting on or near the site would be less than significant.

Special-Status Bats

Trees located within and along the perimeter of the project site and cavities in the existing buildings may provide roosting habitat for special-status bats and other designated priority bat species, including the pallid bat and Townsend's western big-eared bat. Tree trimming/removal and demolition of the existing buildings could displace any roosting bats, if present. Destruction of active

roosts, particularly a maternity roost of a special-status bat species with a high or medium-high priority by the Western Bat Working Group, would constitute a significant adverse effect.

Mitigation Measures:

MM BIO-1.2: Adequate measures shall be taken to avoid roosting by special-status bat species as a result of tree removal and building demolition, specifically:

- To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e. generally avoiding tree removal or trimming April through October).
- Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e. generally avoiding demolition April through October).
- If tree removal, trimming, or building demolition occurs within bat maternity season (i.e. generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities.
- If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season.
- Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs shall remain on the ground for at least 24-hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition.
- A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-1.2, impacts to individual bats and non-special status individuals and colonies of bats would be avoided during project construction. **(Less than Significant Impact with Mitigation Incorporated)**

Impact BIO-2:	The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(No Impact)**

As discussed in Section 3.4.1.3 Existing Conditions, no riparian habitat or sensitive natural communities are present within the project site. Therefore, since construction and operation of the proposed project would be constrained to the project site, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. **(No Impact)**

Impact BIO-3:	The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(No Impact)**

Implementation of the project would result in the removal of the arroyo willow stands and meadow discussed in Section 3.4.1.3 Existing Conditions. Both willow stands are surrounded by upland plant species, located on steep slopes, and lack hydric soil conditions; therefore, they do not meet wetland criteria under federal or state wetland definitions. The Biological Resource Assessment (see Appendix D), Biological Peer Review (see Appendix F), and Wetland Assessment (see Appendix E) all agree that the approximately 865 square foot meadow in the southwest corner of the project site appears to contain wetland features; however, the Wetland Assessment documents that the small meadow is not a naturally occurring wetland, is isolated from natural drainages downstream, and is the result of deferred maintenance of the project site's drainage system. While the Biological Resource Assessment identifies the presence of wetland features, it does not reach a definitive conclusion about the meadow qualifying as a jurisdictional wetland and recommends a formal wetland delineation be performed prior to project implementation to allow the US Army Corp and/or the Regional Water Quality Control Board to determine whether to assert jurisdiction over the meadow as a wetland. The Biological Peer Review, however, agrees with the findings of the Wetland Assessment and concludes that the meadow would not qualify as a jurisdictional wetland under the Clean Water Act or Porter-Cologne Act. Based on the information presented regarding the origin and nature of the meadow, and consistent with the findings of the Biological Peer Review and Wetland Assessment, the City concludes that the meadow is not a formal wetland and, therefore, the removal of the meadow would not constitute a significant impact under CEQA and no mitigation is required to offset its loss. Thus, the project would not have a substantial adverse effect on state or federally protected wetlands. **(No Impact)**

Impact BIO-4:	The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. **(Less than Significant Impact)**

As documented in Section 3.4.1.3 Existing Conditions, the project site is located in an urban area and has been extensively disturbed by past development, and is almost fully developed with buildings and impervious surfaces. No watercourses or other natural features are present that would serve as a movement corridor for migratory fish or wildlife species, or as a native wildlife nursery. The majority of trees and understory grasses, forbs, and other plants located on the perimeter of the project site would be preserved and continue to serve as habitat for local wildlife. Any wildlife present within the vicinity of the project site is already acclimated to human activity, and construction activities would not cause any significant impacts on wildlife movement in the area. For these reasons, the project would not interfere with fish and wildlife movement or in the use of native wildlife nursery sites. **(Less than Significant Impact)**

Impact BIO-5:	The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **(Less than Significant Impact)**

As discussed under Impact BIO-1, the project would mitigate potential impacts to nesting birds and bats to a less than significant level (consistent with General Plan policies LU-17 and LU-18). Additionally, the project would not conflict with the San Bruno Mountain Habitat Conservation Plan (refer to the discussion under Impact BIO-6), consistent with General Plan Policy RME-16. The project proposes to replace any trees removed during construction at a 2:1 ratio; however, since the trees are located on private property, the removal of these trees is not regulated by the City of Daly City and the City's Urban Forestry Ordinance. Off-site improvements (see Section 2.2.2.1 above) related to the project could result in the removal of street trees; however, the project would comply with the City's Urban Forestry Ordinance by replacing any removed street trees with a similar sized tree or through a fee payment directly to the City. Accordingly, the project would not conflict with any local policies or ordinances protecting biological resources. **(Less than Significant Impact)**

Impact BIO-6:	The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(No Impact)**

The project site is approximately 1.5 miles southwest of the San Bruno HCP boundary. Therefore, the project would not conflict with the provisions of an adopted HCP. **(No Impact)**

3.4.2.2 *Cumulative Impacts*

Impact BIO-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The geographic area for cumulative impacts to biological resources includes the project site and its surrounding area because localized development would affect the same group of biological resources. The only cumulative projects within the vicinity of the project site are the Serramonte Shopping Center Expansion, located at 3 Serramonte Center, and the Serramonte Condominiums and Hotel project, located at 525-595 Serramonte Boulevard, both of which are adjacent to the northeast corner of the project site.

Candidate, Sensitive, or Special Status Species

As discussed under Impact BIO-1, the project would have a less than significant impact on candidate, sensitive, and special-status species with implementation of MM BIO-1.1 and MM BIO-1.2. Similar to the project, trees located at 3 Serramonte Center and 525-595 Serramonte Boulevard and cavities in existing buildings at 3 Serramonte Center may provide nesting and roosting habitat for birds and bats. Both the Serramonte Center Expansion and Serramonte Condominiums and Hotel projects would be subject to the same federal (FESA, MBTA), state (CESA, Fish and Game Code), and local policies and regulations in the City's General Plan protecting these species of birds and bats, and would be required to implement protective measures as warranted. Further, the project site, 3 Serramonte Center, and 525-595 Serramonte Boulevard are separated by a major intersection and intervening easements, which would reduce the potential for these projects to result in a cumulatively considerable impact to these species. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact on candidate, sensitive, or special-status species. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Riparian Habitats or Sensitive Natural Communities

No riparian habitats or sensitive natural communities are present within the project site or adjacent parcels; therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact on riparian habitats or other sensitive natural communities. **(Less than Significant Cumulative Impact)**

Wetlands

As discussed under Impact BIO-3, the project would have no impact on state or federally protected wetlands. No wetlands are mapped within the cumulative project sites on the U.S. Fish and Wildlife National Wetlands Inventory, and these cumulative projects would be subject to the state and federal regulations protecting wetlands identified in Section 3.4.1.2 Regulatory Framework should any wetlands be discovered during the environmental review process.[20] Accordingly, the project would

[20] U.S. Fish and Wildlife Service. "National Wetlands Inventory". Accessed December 22, 2021. https://www.fws.gov/wetlands/data/Mapper.html

not result in a cumulatively considerable contribution to a cumulatively significant impact on state or federally protected wetlands. **(Less than Significant Cumulative Impact)**

Movement, Migration, or Use of Native Wildlife Nursery Sites

No watercourses or natural features are present within the project site or adjacent parcels that would serve as a movement corridor for migratory fish or wildlife species, or as a native wildlife nursery. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant impact fish and wildlife movement or in the use of native wildlife nursery sites. **(Less than Significant Cumulative Impact)**

Policies or Ordinances Protecting Biological Resources

As discussed under Impact BIO-5, the project would be in compliance with policies and ordinances protecting biological resources, specifically those outlined in the City's General Plan and Municipal Code. The cumulative projects identified in Table 3.0-1 would also be required to comply with these same policies, and therefore the project would not result in a cumulatively considerable contribution to a cumulatively significant conflict with local policies or ordinances protecting biological resources. **(Less than Significant Cumulative Impact)**

Habitat Conservation Plans

Neither the project site or other cumulative projects are located within an area covered by an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(No Cumulative Impact)**

3.5 CULTURAL RESOURCES

The following discussion is based, in part, on a Historic Resources Evaluation prepared by Archaeological/Historical Consultants, dated October 2021. A copy of this report is attached to this EIR as Appendix G. The analysis is also based on a Cultural Resources Study prepared for the project by Tom Origer & Associates, dated February 2021. A copy of this report is on file at the City of Daly City Planning Division.

3.5.1 Environmental Setting

3.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[21]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

[21] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed August 31, 2020. http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native

American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to cultural resources and are applicable to the proposed project.

Policy/Task	Description
Policy LU-19.1	Archeological resources should be preserved where possible.
Task LU-19.1	Archeological resources are a valuable educational resource for the residents of the city. Every effort should be made to preserve them in their natural state when found or be excavated by professional archeologists for display in a museum.
Policy RME-19	Undertake measures to protect and preserve historic and archaeological resources.
Task RME-19.1	Comply with State statues related to historical and archaeological resources.
Task RME-19.1	Serve as a leader in historic preservation by preserving, restoring, and reusing City-owned historic resources where feasible.

3.5.1.2 *Existing Conditions*

Archaeological Resources

The San Francisco Bay Area was historically inhabited by a Native American group known as the "Costanoan" or Ohlone over a period of 5,000 to 8,000 years prior to Spanish exploration and colonization of the region. According to the Northwest Information Center (NWIC), Native American resources in the northern part of San Mateo County have been found in close proximity to sources of water (including perennial and intermittent streams and springs), near the bay margin and its associated wetlands, along the coastal terraces and sheltered valleys, and near ecotones and other productive environments. The tribelet which inhabited the Daly City area lived primarily in two main inland villages located on the Colma and San Bruno Creeks and a seasonal village along the coast at Mussel Rock. At the time of European settlement, the project site was controlled by the Ramaytush linguistic group of the Ohlone/Costanoan people.

The project site is within an urbanized area of Daly City and is developed with the JUHSD campus, which is situated on an artificial flat that was created when the property was developed in 1969. The project site is located at what was once the headwaters of a small drainage that flowed east into Colma Creek. Prior to development of the project site, this drainage would have been the closest source of freshwater for nearby Ohlone/Costanoan people. No archaeological resources have been documented within a half-mile of the project site.

Historic Resources

The project site is currently developed with the JUHSD campus, which includes a main campus and storage bungalows (constructed in 1969), a General Education Department building (constructed in 1982), two one-story portables (constructed in 1998) and a Comcast relay station (constructed in 2002). Neither the project site or existing buildings are identified as a historic resource in the NRHP or CRHR, or identified as a property with potential historic value in the Daly City General Plan. The Historic Resources Evaluation prepared by Archaeological/Historical Consultants found none of the buildings to be an example of any unique architectural style or the work of a master architect or builder, nor were any structures determined to be associated with any significant person or local event in the area, and therefore the JUHSD campus does not meet the definition of an historic resource under CEQA. There are no documented historic resources within the vicinity of the JUHSD campus.

3.5.2 Impact Discussion

For the purpose of determining the significance of the project's impact on cultural resources, would the project:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
3) Disturb any human remains, including those interred outside of dedicated cemeteries?

3.5.2.1 *Project Impacts*

Impact CUL-1:	The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(No Impact)**

The existing JUHSD campus is not listed in the National Register of Historic Places or the California Register of Historical Resources, or the local registry of historic resources reflected in the Daly City General Plan. While the main campus and storage bungalows are over 50 years in age, these buildings are of simple utilitarian design constructed with commonplace materials (steel, concrete, wood, tar, gravel) and are not an example of any unique architectural style or the work of a master architect or builder. Further, these buildings are not known to be associated with any significant person or local event in the area. There are no documented historic resources within the vicinity of the JUHSD campus. For these reasons, demolition of the JUHSD campus would not cause a substantial adverse change in the significance of a historical resource. **(No Impact)**

Impact CUL-2:	The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**

The project site has been previously disturbed and developed with the JUHSD campus as described under Section 3.5.1.2 Existing Conditions. No archaeological resources have been documented within a half-mile of the project site. However, based on the site's proximity to a historic freshwater source and the historic occupation of Daly City and the project site by the Ohlone/Costanoan people, the Cultural Resources Study identified a moderate sensitivity for subsurface archaeological resources to be encountered during construction-related ground disturbing activities (demolition, grading, excavation, etc.). The project could result in significant impacts to undiscovered subsurface archaeological resources if encountered during construction-related ground disturbing activities.

Mitigation Measures:

MM CUL-2.1: Undiscovered Archaeological Resources. 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's Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City's 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 Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

MM CUL-2.2: 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 certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.

Implementation of MM CUL-2.1 would ensure that any potentially undiscovered archaeological resources are identified and appropriately treated and protected by a qualified archaeologist in accordance with the Secretary of the Interior's standards. Mitigation addressing subsurface archaeological resources would be documented and enforced through implementation of MM CUL-2.2. Therefore, the project would not cause a substantial adverse change in the significance of an

archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**

Impact CUL-3:	The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact with Mitigation Incorporated)**

Due to the project site's history of prehistoric residential activities, human remains have the potential to be discovered during construction. If human remains are unearthed during project construction, damage to or destruction of human remains would be a potentially significant impact.

Mitigation Measures:

MM CUL-3.1: Human Remains. If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's 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.

By following the process set forth in MM CUL-3.1, the project would ensure that any human remains encountered during ground-disturbing activities are appropriately identified and treated. **(Less than Significant Impact with Mitigation Incorporated)**

3.5.2.2 *Cumulative Impacts*

Impact CUL-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant cultural resources impact. **(Less than Significant Cumulative Impact)**

The project would not impact historic resources, and so would not contribute to cumulative impacts to historic resources. With regard to archaeological resources, most development projects in Daly City would require a level of excavation and grading or other activities that may affect archaeological resources, including human remains. Each project is to complete its own literature review, as applicable, to determine the level of archeological and cultural sensitivity of its project site. However, all projects occurring within Daly City would be required to implement mitigation measures, as applicable, that would avoid impacts and/or reduce them to a less than significant level, consistent with CEQA requirements. Such measures consist of preliminary investigation prior to full excavation, avoidance measures during ground disturbance activities, and/or monitor during ground disturbance activities. Collection and evaluation of finds are also part of these conditions and/or mitigation measures. These projects would also be subject to federal, state, and county laws regulating cultural resources such as protocols of handling human remains, if found on the project site. For these reasons, the proposed project in combination with the cumulative scenario project would not result a significant cultural resources impact. **(Less than Significant Cumulative Impact)**

3.6 ENERGY

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2022, is attached to this EIR as Appendix C.

3.6.1 Environmental Setting

3.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2 from the atmosphere through sequestration.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately

every three years.[22] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[23]

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[24]

Local

City of Daly City General Plan

The City of Daly City's General Plan includes specific goals and policies to address energy conservation opportunities within the City. All new residential and nonresidential construction in the City must abide by the State of California's residential building standards for energy efficiency (Title 24 of the California Administrative Code). Title 24 Standards were established in 1978 to ensure that all new construction meets a minimum level of energy efficiency.

Policy/Task	Description
Policy HE-23	Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.
Task HE-23.1	Develop enhanced residential energy efficiency standards (Title 24, California Administrative Code) in all new residential construction which exceeds State-mandated requirements by five percent in 2015, ten percent in 2020, and twenty percent in 2030.
Task HE-23.2	Establish energy and water efficiency upgrade programs that promote energy and water efficiency upgrades in all existing residential buildings. Energy efficiency upgrades promoted as part of this program could include upgrades such as attic

[22] California Building Standards Commission. "California Building Standards Code." Accessed December 1, 2021. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[23] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed December 1, 2021. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.
[24] California Air Resources Board. "The Advanced Clean Cars Program." Accessed December 1, 2021. https://www.arb.ca.gov/msprog/acc/acc.htm.

Policy/Task	Description
	insulation, programmable thermostats, heating duct insulation, and water heater insulation. Water efficiency upgrades could include the installation of low-flow shower heads, where feasible, and retrofit of existing toilets to meet low-flush requirements as established by the City. Examples of programs developed as a part of this task could provide financial incentives (e.g., rebates, appliance buy-back, and similar programs) aimed at providing strong incentives to residential building owners to use the programs.
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City's Green Vision

Daly City's Green Vision, A Climate Action Plan (CAP) for 2011-2020 and Beyond, was adopted in December 2010. Daly City's Green Vision guides the City towards a sustainable future that reduces GHG emissions from current levels, while promoting economic prosperity for present and future generations. The Green Vision identifies ten goals and seeks to achieve these goals through cost-effective strategies by the year 2020. The GHG reduction goals include adopting a general plan with measurable policies for sustainable development, reducing energy use in buildings, reducing transportation emissions, reducing solid waste disposal, and GHG emissions reductions from municipal operations. Daly City completed an update to the General Plan which incorporated these goals in March 2013.

Daly City Municipal Code

The City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas.[25] The City's Recycling and Diversion of Construction and Demolition ordinance (Municipal Code 15.64) requires that construction and demolition projects recycle or reuse 60 percent of the waste generated from the project. This ordinance is consistent with the requirements for construction and demolition debris diversion in CALGreen. Many of the construction materials, such as concrete, asphalt, asphalt singles, gypsum wallboard, wood and metals, can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

3.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 7,802 trillion British thermal units (Btu) in the year 2019, the most recent year for which this data was available.[26] Out of the 50 states, California is ranked second in total energy consumption and 46th in energy consumption per capita. The breakdown by sector was approximately 19 percent (1,456 trillion Btu) for residential uses, 19 percent (1,468 trillion Btu) for commercial uses, 23 percent (1,805 trillion Btu) for industrial uses,

[25] City of Daly City. *Daly City Municipal Code Ordinance No. 1448*. May 10, 2021.
[26] United States Energy Information Administration. "State Profile and Energy Estimates, 2019." Accessed December 1, 2021. https://www.eia.gov/state/?sid=CA#tabs-2.

and 39 percent (3,073 trillion Btu) for transportation.[27] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2020 was consumed primarily by the non-residential sector (60 percent), with the residential sector consuming 40 percent. In 2020, a total of approximately 4,167 GWh of electricity was consumed in San Mateo County.[28]

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources. [29] The project site currently uses approximately 1.7 GWh of electricity per year.

Natural Gas

PG&E provides natural gas services within the City of Daly City In 2020, approximately two percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.[30] In 2019 residential and commercial customers in California used 33 percent of the state's natural gas, power plants used 26 percent, the industrial sector used 35 percent, and other uses used six percent.[31] Transportation accounted for one percent of natural gas use in California. In 2019, San Mateo County used approximately nine percent of the state's total consumption of natural gas.[32] The project site currently uses approximately 2,788,100 kBtu of natural gas per year.

Fuel for Motor Vehicles

In 2019 (pre-Covid), 15.4 billion gallons of gasoline were sold in California.[33] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in

[27] Ibid.
[28] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed December 1, 2021. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[29] Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed December 1, 2021. https://www.peninsulacleanenergy.com/faq/. 2) Peninsula Clean Energy. "Energy Choices." Accessed December 1, 2021. https://www.peninsulacleanenergy.com/faq/.
[30] California Gas and Electric Utilities. 2020 *California Gas Report.* Accessed August 2, 2021. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.
[31] United States Energy Information Administration. "State Profile and Energy Estimates, 2019." Accessed August 2, 2021. https://www.eia.gov/state/?sid=CA#tabs-2.
[32] California Energy Commission. "Natural Gas Consumption by County." Accessed August 2, 2021. http://ecdms.energy.ca.gov/gasbycounty.aspx.
[33] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed December 1, 2021. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

2020.[34] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in March 2020 to require all cars and light duty trucks achieve an overall industry average fuel economy of 40.4 mpg by model year 2026. [35,36] The existing uses vehicles miles traveled (VMT) is estimated to be 1,904,889.[37] Assuming a 25.4 mpg, the trips from existing uses require use approximately 75,000 gallons of fuel per year.

3.6.2 Impact Discussion

For the purpose of determining the significance of the project's impact on energy, would the project:

1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

3.6.2.1 *Project Impacts*

Impact EN-1:	The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **(Less than Significant Impact)**

Construction

Construction of the project would require energy for the manufacture and transportation of building materials, site preparation and grading, and construction of the proposed Parcel B Development project and future buildout of the proposed Precise Plan. Construction processes are generally designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, as well as maintenance and fuel. In addition, as discussed in Section 3.3 Air Quality, the project would implement mitigation measures to minimize the idling of construction equipment thus reducing the potential for energy waste. Further, the project would recycle at least 60 percent of construction and demolition waste. For these reasons, construction of the project would not use energy in a wasteful manner.

Operational

The proposed project would increase the density/intensity of uses on the site and would result in a net increase in energy use. Operation of the project would consume energy for multiple purposes

[34] United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010U68.pdf

[35] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed December 1, 2021. http://www.afdc.energy.gov/laws/eisa.

[36] Public Law 110–140—December 19, 2007. *Energy Independence & Security Act of 2007.* Accessed December 1, 2021. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.

[37] Illingworth & Rodkin, Inc. *Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment.* June 17, 2022.

including, building heating and cooling, lighting for the proposed buildings and parking garages, and operation of appliances and electronics. Energy would also be consumed during each vehicle trip generated by residents, visitors, and employees. The project's estimated energy demand is summarized in Table 3.6-1.

Table 3.6-1: Estimated Annual Project Energy Demand

	Net Electricity (GWh)	**Net Natural Gas** (kBtu)	**Net Gasoline*** (gallons)
Existing	1.70	2,788,100	75,000
Project	7.65	63,840	734,326

Note: *Gasoline demand was calculated by dividing the project's estimated VMT by 25.4 mpg (Source: Illingworth & Rodkin, Inc. *Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment*. June 17, 2022.)

To ensure that energy is not wasted or unnecessarily consumed, the project would comply with Title 24 and CALGreen energy efficiency measures, as well as City of Daly City Green Vision requirements and Recycling and Diversion of Construction and Demolition Ordinance. These various requirements would reduce project energy demand by ensuring that the project would be built to current energy efficiency standards, include energy efficient appliances, and reduce construction waste disposal trips. As noted above, the City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas. The project is also on an infill site that encourages alternatives to single-vehicle occupancy trips by being proximate to transit and being on a site adequately served by pedestrian and bicycle facilities. For these reasons, operation of the project would not use energy in a wasteful manner. **(Less than Significant Impact)**

Impact EN-2: The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

According to the 2019 Integrated Energy Policy Report, the state is working towards decarbonizing the energy system and moving towards a 100 percent carbon-free system by 2045.[38] The project would obtain energy from the PCE which provides 50 to 100 percent carbon free electricity to the project site. The project would result in an increase in demand on existing energy resources; however, the project is required to comply with applicable regulations and City policies that would conserve energy and water, and reduce fuel consumption and waste generation. For these reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

[38] California Energy Commission. *2019 Integrated Energy Policy Report*. 2019.

3.6.2.2 *Cumulative Impacts*

Impact EN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant energy impact. **(Less than Significant Cumulative Impact)**

By its nature, energy is a cumulative resource, and demands on energy supplies are cumulative. Past, present, and future development projects contribute to the state's energy impacts. If the project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. As discussed under Impact EN-1 and Impact EN-2 above, the project itself would not result in significant energy impacts. Further, all projects in Daly City and adjacent cities are required to meet CALGreen and Title 24 energy efficiency requirements, thus lessening overall energy demand. Therefore, the project would not result in a considerable contribution to a significant cumulative energy impact. **(Less than Significant Cumulative Impact)**

3.7 GEOLOGY AND SOILS

The following discussion is based, in part, on a Preliminary Geotechnical Investigation Report prepared for the project by Slate Geotechnical Consultants, Inc. A copy of this report, dated April 20, 2021, is attached to this EIR as Appendix H.

3.7.1 Environmental Setting

3.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The CBC prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to hazards and hazardous materials and are applicable to the proposed project.

Policy	Description
Policy SE-1.1	Continue to investigate the potential for seismic and geologic hazards as part of the development review process and maintain this information for the public record. Update Safety Element maps as appropriate.
Policy SE-1.2	Require site specific geotechnical, soils, and foundation reports for development proposed on sites identified in the Safety Element and its Geologic and Hazard Maps as having moderate or high potential for ground failure.
Policy SE-1.3	Permit development in areas of potential geologic hazards only where it can be demonstrated that the project will not be endangered by, nor contribute to, the hazardous condition on the site or on adjacent properties. All proposed development is subject to the City's Zoning Ordinance and Building Codes.
Policy SE-1.4	Prohibit development—including any land alteration, grading for roads and structural development—in areas of slope instability or other geologic concerns unless mitigation measures are taken to limit potential damage to levels of acceptable risk.
Policy SE-6.1	Regulate building construction practices to prevent hazardous structures and assure structural safety. Measures may include requiring conformance to an accepted set of construction standards, authorizing inspection of suspected dangerous structures, discontinuing improper construction activities, and eliminating hazardous conditions.

Daly City Municipal Code

Title 15 of the Daly City Municipal Code includes Chapter 15.62 “Grading, Erosion, and Sediment Control”, which is intended to provide for safe grading operations, to safeguard public health and property, and to preserve and enhance the natural environment, including, but not limited to, water quality, by regulating site clearing, grading and erosion control on all public and private properties. Among other conditions, Chapter 15.62 requires projects to prepare an erosion and sediment control

plan, an engineering geology report, and when requested, a soil/geotechnical engineering report in order to address geological and soils related hazards and engineering issues.

3.7.1.2 *Existing Conditions*

Regional Geology

The project site and surrounding area is located within the Coast Ranges physiographic province, a series of northwest-trending mountain ranges and valleys that extend along much of the coastal region of California. Geologic mapping indicates that the project site is underlain by the late Pliocene- to early Pleistocene-age Merced Formation, which consists of weak, friable sandstone, siltstone, and claystone, with local fossiliferous beds that are well-cemented.

Seismicity and Seismic Hazards

The entire San Francisco Bay Area is located within the San Andreas Fault Zone, a complex of active faults with the potential to generate earthquakes of magnitude 7.0 or greater. The overall probability of a magnitude 6.7 or greater earthquake on a fault in the greater Bay Area in the next 30 years is estimated at 63 percent. The closest major active fault segments include the San Andreas Fault Peninsula segment, located 0.6 miles southwest of the project site, the Pilarcitos Fault (located 4.5 miles southwest), the San Gregorio Fault North segment (located five miles southwest), and the Point Reyes Fault (located 6.3 miles west).

The project site is not within an Alquist-Priolo Fault Zone.[39] Based on hazard maps prepared for the Daly City General Plan, the project site is projected to experience very violent shaking during a seismic event, is at very low risk of liquefaction, and at moderate risk of landsliding.[40] Additionally, as the project site is considered to be at very low risk of liquefaction, it is also considered to be at low risk of lateral spreading.[41]

Soils and Topography

Based on subsurface borings and cone penetration tests completed in 2019 for the project site, underlying soils are a mixture of fill materials and native soil and weathered rock. Fill materials on site consist of variable compositions of sand, clayey sand, and sandy clay ranging in density from medium dense to very dense and consistency from medium stiff to hard. Fill materials are expected to be up to 140 feet in thickness in areas to the west and south of the existing buildings on-site. The native soil and weathered rock encountered consisted of clayey sand and sandy clay ranging in density and consistency from dense to very dense and stiff to hard. Soils tested during subsurface borings had a Plasticity Index (PI) of six.

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[39] California Geological Survey. *California Earthquake Hazards Zone Application (EQ ZAPP).* Date accessed September 22, 2020. https://maps.conservation.ca.gov/cgs/EQZApp/app/

[40] Liquefaction is a temporary loss of shear strength as a result of increased pore pressure due to strong ground shaking or cyclic loading. Liquefaction is defined by saturation of soil and loss of cohesion. It is associated with loose, high-plasticity soils and near-surface groundwater levels.

[41] Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or "free" face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures.

The project site underwent mass grading during the original development of the site between 1966 and 1969, with significant cut and leveling of a high knoll on the eastern half of the site, and mass excavation of existing ravine walls up to 80 feet deep and hillside cuts along the western boundary of the site. As a result, the project site overall is southeast sloping, with the western portion of the site featuring a 100-foot high moderately sloped hillside cut that descends to the relatively flat existing Serramonte Del Rey campus, which extends east to a 65- to 50-foot high slope that descends to Callan Boulevard.

Groundwater

No groundwater was encountered during the subsurface borings completed in 2019 on the project site, which extended between 29 and 50 feet below ground surface (bgs). For purposes of this EIR, groundwater in the project area vicinity is projected to flow generally south and east towards the San Francisco Bay at a depth of greater than 50 feet bgs.[42] Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Paleontological Resources

The project site is within the Merced Formation of the Franciscan complex, which was formed during the early to late Pliocene age of the Neogene period, and has a high sensitivity for paleontological resources. At a regional level, the project site is within the Pilarcitos stratigraphic area, which has approximately nine historic fossil collection sites, the closest of which is Mussel Rock, approximately one mile west of the project site. Fossils have been discovered elsewhere in Daly City along the coastline and on the shores of Lake Merced, but have not been discovered inland within Daly City.[43] As discussed above, the project site underwent mass grading and is underlain by fill, therefore, paleontological resources are unlikely to be found near the ground surface.

3.7.2 Impact Discussion

For the purpose of determining the significance of the project's impact on geology and soils, would the project:

1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
   - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?
   - Strong seismic ground shaking?
   - Seismic-related ground failure, including liquefaction?
   - Landslides?
2) Result in substantial soil erosion or the loss of topsoil?

[42] Strata Environmental Services, Inc. *Phase I Environmental Site Assessment, Serramonte del Rey Campus*. February 2020.
[43] Macrostrat. "Macrostrat Geologic Map". Accessed September 14, 2021. https://macrostrat.org/map/#/z=1.5/x=16/y=23/bedrock/lines/

3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

3.7.2.1 *Project Impacts*

Impact GEO-1:	The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides**. (Less than Significant Impact)**

Fault Rupture

As discussed under Section 3.7.1.2 Existing Conditions, the project site is not within an Alquist-Priolo Fault Zone. As the nearest major active fault segment is located 0.6 miles southwest and no known faults intersect the study area, fault rupture is not anticipated to occur within the project site. As such, the project would not result in any substantial adverse effects associated with fault ruptures.

Seismic Ground Shaking

As discussed under Section 3.7.1.2 Existing Conditions, the project site is located within the seismically active San Andreas Fault Zone. During a seismic event, the project site may experience very violent ground shaking. Consistent with the findings of the Daly City 2030 General Plan Environmental Impact Report (General Plan EIR), compliance with the building codes and construction standards established by the CBC as required by law would be sufficient to protect against building collapse and major injuries during a seismic event.[44] The project would comply with current CBC building codes and standards and be constructed in accordance with the recommendations of a site-specific geotechnical investigation (as required by the CBC) and the engineering geology report prepared as required by Chapter 15.62 of the Daly City Municipal Code. For these reasons, the project would not result in substantial adverse effects associated with seismic ground shaking.

[44] City of Daly City. *General Plan Update Draft Environmental Impact Report*. October 2012. Page 3.5-15.

Liquefaction and Lateral Spreading

As discussed under Section 3.7.1.2 Existing Conditions, the project site is at a very low risk of liquefaction, and therefore at low risk of lateral spreading. The Geotechnical Investigation concluded that due to presence of stiff clay zones and the depth of groundwater (> 50 feet bgs), the project site was not at risk of liquefaction and associated effects. Further, the project as previously mentioned would comply with current CBC building codes and standards and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report. As such, the project would not result in substantial adverse effects associated with liquefaction, lateral spreading, and other related phenomenon.

Landslides

As discussed under Section 3.7.1.2 Existing Conditions, the project site is mapped within an area with a moderate landslide risk. However, no landslide areas or landslide deposits have been mapped in the vicinity of the project site, and debris flow probability maps prepared by San Mateo County show that the area has a very low probability (< five percent) for debris flow failures. Based on bedrock type, landslide susceptibility, and lack of observed landslides in the vicinity, the Geotechnical Investigation (refer to Appendix H) concluded that the site-specific potential for seismically-induced landsliding to occur was low, and provided recommendations addressing the western and eastern slopes. As noted above, the project would comply with current CBC building codes and standards, and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report. The General Plan EIR concluded that compliance with aforementioned codes, standards, and reports would reduce adverse effects associated with seismically induced landslides to a less than significant level.[45] **(Less than Significant Impact)**

Impact GEO-2:	The project would not result in substantial soil erosion or the loss of topsoil. **(Less than Significant Impact)**

Construction-related ground disturbing activities (demolition, grading, excavation, etc.) proposed by the project are expected to result in the exposure of soil to wind and water erosion. If managed improperly, construction could result in substantial soil erosion or loss of topsoil.

The City's National Pollutant Discharge Elimination System (NPDES) Municipal Permit and Chapter 15.62 of the City's Municipal Code are the City's primary means of enforcing erosion control measures through the grading and building permit process. Consistent with the findings of the General Plan EIR, compliance with the erosion control provisions included in the NPDES Municipal Permit and the erosion and sediment control plan required by Chapter 15.62 of the Municipal Code would ensure that the project would not result in substantial soil erosion or loss of topsoil.[46] **(Less than Significant Impact)**

[45] Ibid.
[46] Ibid. Page 3.5-17.

Impact GEO-3:	The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

As discussed under Impact GEO-1, the Geotechnical Investigation (refer to Appendix H) concluded that the project site is not unstable or likely to become unstable during a seismic event. Furthermore, the project would be required by law to comply with current CBC building codes and standards and be constructed in accordance with the recommendations of the site-specific geotechnical investigation and engineering geology report, which would ensure that the project would not exacerbate the risk of ground failure, including liquefaction, lateral spreading, landsliding, and other related phenomenon. As such, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

Impact GEO-4:	The project would not be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property. **(Less than Significant Impact)**

Pursuant to the CBC, soils with a PI of 15 or less are not considered expansive, therefore the project would not be located on expansive soil. Additionally, as discussed under Impact GEO-1, the geologic foundation of the project site is at a less than substantial risk of ground failure. By conforming with current CBC building codes and standards and the recommendations of the site-specific geotechnical investigation and the engineering geology report, the project would not create direct or indirect risks to life or property. **(Less than Significant Impact)**

Impact GEO-5:	The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. **(No Impact)**

The proposed project would dispose of wastewater via lateral connections to the City's sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. **(No Impact)**

Impact GEO-6:	The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(Less than Significant Impact with Mitigation Incorporated)**

The project site has previously been extensively developed with the JUHSD campus. Additionally, the project site is not on or adjacent to the Pacific coastline or the shores of Lake Merced where fossils have been previously encountered in Daly City, and there is no evidence of paleontological resources (e.g. the presence of rock outcroppings) on the site. As such, there is a low probability of that the project would result in the discovery of subsurface paleontological resources. Nonetheless, construction-related ground disturbing activities could result in significant impacts, if any unknown unique paleontological resource or site or unique geological feature resources were encountered.

Mitigation Measure: The project will be required to implement the following mitigation measure to reduce potential impacts to paleontological resources to a less than significant level:

MM GEO-6.1: Unique Paleontological and/or Geologic Features and Reporting. 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's Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. 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.

Implementation of MM GEO-6.1 would ensure that any paleontological resource or unique geological feature encountered during project construction would be identified and subsequently evaluated and protected in accordance with California Public Resources Code Section 5097.5. As such, impacts to unique paleontological resources would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

3.7.2.2 *Cumulative Impacts*

Impact GEO-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The cumulative projects shown in Table 3.0-1 would be subject to similar geology, soils, and seismicity conditions as the proposed project. All cumulative projects occurring within Daly City would implement standard permit conditions related to geologic hazards and would be constructed consistent with the CBC and site-specific geotechnical investigations in order to avoid impacts from seismicity and geology and soils hazards, and/or reduce them to a less than significant level. Projects in the cumulative scenario would also be subject to similar CEQA requirements and mitigation measures as the proposed project with regard to avoidance and lessening of paleontological impacts. For these reasons, the cumulative projects, including the proposed project, would not result in significant cumulative geology and soils impacts. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.8 GREENHOUSE GAS EMISSIONS

The following discussion is based, in part, on an air quality and greenhouse gas assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 17, 2021, is attached to this EIR as Appendix C.

3.8.1 Environmental Setting

3.8.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

3.8.1.2 *Regulatory Framework*

State

Assembly Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050. Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional

2017 Clean Air Plan

To protect the climate, the 2017 CAP (prepared by BAAQMD) includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD's CEQA Air Quality Guidelines do not use quantified thresholds for projects that are in a jurisdiction with a qualified GHG reductions plan (i.e., a Climate Action Plan). The plan has to address emissions associated with the period that the project would operate (e.g., beyond year 2020). For quantified emissions, the guidelines recommended a GHG threshold of 1,100 metric tons or 4.6 metric tons (MT) per capita. These thresholds were developed based on meeting the 2020 GHG

targets set in the scoping plan that addressed AB 32. Development of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate. Although BAAQMD has not published a quantified threshold for 2030 yet, this EIR utilizes an efficiency metric of 2.8 MT CO2e/year/service population and a bright-line threshold of 660 MT CO2e/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO2e/year threshold.

Local

Daly City General Plan

The Housing Element of the City's General Plan contains policies, recommendations, and actions to promote energy conservation. Through energy conservation, GHG emissions are reduced. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including the policy listed below.

Policy	Description
Policy HE-23	Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City's Green Vision

Daly City's Green Vision, A Climate Action Plan (CAP) for 2011-2020 and Beyond, was adopted in December 2010. Daly City's Green Vision guides the City towards a sustainable future that reduces GHG emissions from current levels, while promoting economic prosperity for present and future generations. The Green Vision identifies ten goals and seeks to achieve these goals through cost-effective strategies by the year 2020. The GHG reduction goals include adopting a general plan with measurable policies for sustainable development, reducing energy use in buildings, reducing transportation emissions, reducing solid waste disposal, and GHG emissions reductions from municipal operations. Daly City completed an update to the General Plan which incorporated these goals in March 2013.

Daly City Municipal Code

The following ordinances consistent with the goals of Daly City's Green Vision were adopted by the City Council in order to protect the environment and health of the community:

Ordinance 1448: This ordinance requires all new residential buildings to be all electric and use no natural gas.[47]

[47] City of Daly City. *Daly City Municipal Code Ordinance No. 1448*. May 10, 2021.

Green Building Standards Code (Municipal Code 15.22): The purpose of the ordinance is to adopt and incorporate the California Green Building Standards Code, 2013 edition, for the protection of the public health and safety of its inhabitants.

Recycling and Diversion of Construction and Demolition (Municipal Code 15.64): This ordinance requires that construction and demolition projects recycle or reuse 60 percent of the waste generated from the project. This ordinance is consistent with the requirements for construction and demolition debris diversion in CALGreen. Many of the construction materials, such as concrete, asphalt, asphalt singles, gypsum wallboard, wood and metals, can be reused or recycled, thus prolonging our supply of natural resources and potentially saving money in the process.

3.8.1.3 *Existing Conditions*

GHG emissions are generated from vehicles entering and leaving the site and from heating, cooling, and lighting of the existing buildings, as well as water used by current site users and wastewater generated on-site. The project site currently generates approximately 1,093 MT of CO_2e annually. For the purposes of this analysis, the Parcel A development project is assumed to be not built/occupied; therefore, it is not included in existing conditions. Parcel A is included as part of the operational emissions for the proposed project.

3.8.2 Impact Discussion

For the purpose of determining the significance of the project's impact on greenhouse gas emissions, would the project:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

3.8.2.1 *Project Impacts*

Impact GHG-1:	The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact)**

GHG emissions associated with the project would occur over the short-term from construction activities, as well as operational emissions over the long term (associated with vehicular traffic within the project vicinity, the generator, energy and water usage, wastewater, and solid waste disposal). GHG emissions for the proposed project were analyzed using the methodology recommended in the BAAQMD CEQA Air Quality Guidelines. CalEEMod was used to predict GHG emissions from the project (as detailed in Appendix C).

Construction Emissions

GHG emissions associated with construction of Parcel B-F, based on construction data provided by the project applicant, were computed by CalEEMod to be 3,101 MT of CO_2e. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. For these reasons, any impact would be less than significant.

Operational Emissions

Project operation would generate GHGs primarily through electricity generation/use and generation of vehicle trips. At full buildout and occupancy of the Precise Plan Parcels A-F, net operational GHG emissions from the project are estimated to be 5,585 MT of CO_2e for 2030, which exceeds the 2030 BAAQMD threshold of 660 MT/year of CO_2e (see Table 3.8-1). Land use projects with emissions above the 660 MT/year threshold are then subject to the GHG efficiency threshold of 2.8 MT per year per capita (MT/year/capita) to determine impact significance. For purposes of calculating per service population emissions, gross project GHG emissions are used, rather than the net GHGs used for establishing 'brightline' emissions. The project service population efficiency rate is based on the number of future residents. For this project, the number of future residents was estimated by multiplying the total number of units (i.e., 1,235 units) by the persons per household rate for the City of Daly City found in the California Department of Finance Population and Housing Estimate report.[48] Using the 3.33-person per household 2020 rate, the number of future residents was estimated to be 4,113 residents.

Table 3.8-1: Annual GHG Emissions (CO_2e) in Metric Tons

Source Category	Existing Conditions in 2022	Proposed Project in 2030
Area	0	15
Energy Consumption	311	3
Mobile	684	6,315
Solid Waste Generation	55	295
Water Usage	43	50
Total	1,093	6,678
Net Emissions		5,585
Significance Threshold		*660*
Per Service Population Emissions (MT of CO_2e/year/service population)		**1.62**
Significance Threshold		*2.8*

[48] State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. Sacramento, California. Accessed May 5, 2022. https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/.

Table 3.8-1: Annual GHG Emissions (CO_2e) in Metric Tons		
Source Category	**Existing Conditions in 2022**	**Proposed Project in 2030**
(MT of CO_2e/year/service population)		
Threshold Exceeded?		***No***

As shown in Table 3.8-1, the proposed project would not exceed the per capita 2030 threshold of 2.8 MT of CO_2e/year/service population; therefore, the project would meet the GHG reduction target set by SB 32 and not result in a significant GHG emissions impact. **(Less than Significant Impact)**

Impact GHG-2:	The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

2017 Climate Action Plan

As discussed in Section 3.3 Air Quality, the project is consistent with the 2017 CAP because it supports the primary goals of the 2017 CAP (by providing increased density in a transit priority area) and does not exceed thresholds for greenhouse gas emissions (see Table 3.8-1 above).

Daly City General Plan

The project would be consistent with the City's General Plan policies [specifically Policy HE-23 of increasing energy efficiency standards in new and existing housing developments], Green Vision, and Green Building Ordinance because the project proposes to be constructed in compliance with the current California Green Building Standards Code (Title 24), which requires efficient windows, insulation, lighting, ventilation systems, and other features that reduce water and energy consumption. As noted previously, the City recently adopted Ordinance 1448, which requires all new residential buildings to be all electric and use no natural gas, which would further reduce GHG emissions.

The project would comply with the requirements of the Green Building Ordinance and the Title 24 Building Code, which requires proposed buildings to be constructed with various measures that would reduce GHG emissions from the project. For this reason, the project would be consistent with the City's General Plan, Green Vision, and Green Building Ordinance. **(Less Than Significant Impact)**

3.8.2.2 *Cumulative Impacts*

Impact GHG-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact. **(Less than Significant Cumulative Impact)**

GHG emissions have a broader, global impact; therefore, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable. As discussed in Impact

GHG-1, the project would not result in significant GHG impacts by the year 2030 and would meet the GHG reduction target set by SB 32. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative GHG emissions impact. **(Less than Significant Cumulative Impact)**

3.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based, in part, on a Phase I Environmental Site Assessment (ESA) prepared for the project by Strata Environmental Services, Inc. A copy of this report, dated February 2020, is attached to this EIR as Appendix I.

3.9.1 Environmental Setting

3.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective

action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[49]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[50]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The San Mateo County Environmental Health Department reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA phased out use of friable asbestos products between 1973 and 1978. National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

[49] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 11, 2020. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[50] California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. https://calepa.ca.gov/sitecleanup/corteselist/.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Regional and Local

Municipal Regional Permit Provision C.12.f

Polychlorinated biphenyls (PCBs) were produced in the United States between 1955 and 1978 and used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the EPA banned the production and use of PCBs due to their potential harmful health effects and persistence in the environment. PCBs can still be released to the environment today during demolition of buildings that contain legacy caulks, sealants, or other PCB-containing materials.

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.[51] Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single family homes and wood-frame structures are exempt from these requirements.

San Mateo County Comprehensive Airport Land Use Plan

Daly City is within the jurisdiction of the San Francisco Airport (SFO) Land Use Plan component of the San Mateo County Comprehensive Airport Land Use Compatibility Plan (ALUCP), adopted in December 1996 and updated in 2001. Established in the CLUP are procedures used by the San Mateo City and County Association of Governments (C/CAG) to review land use decisions in the vicinity of San Mateo County airports. Airport planning boundaries define where height, noise and safety standards, policies, and criteria are applied to certain proposed land use policy actions.

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to hazards and hazardous materials and are applicable to the proposed project.

[51] California Regional Water Quality Control Board. *San Francisco Bay Region Municipal Regional Stormwater NPDES Permit.* November 2015.

Policy/Task	Description
Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Task LU-18.1	Ensure that potentially significant environmental impacts associated with development proposals are properly mitigated through conditions of approval, mitigation measures, project design, or project denial. In cases where the impacts may not be completely preventable but will not significantly disrupt the community, the City may recognize that the benefits of a project may outweigh the environmental consequences. In no case shall the City approve a project that endangers the health, safety, or welfare of the public.
Policy SE-4.1	Support efforts to locate, regulate, and maintain information regarding hazardous materials located or transported within the City.
Policy SE-4.2	Cooperate with the County of San Mateo in the regulation of hazardous materials and transportation in the Fire Prevention Services Bureau within the City.
Policy SE-4.6	Require the preparation of a risk assessment to determine site suitability for applications for hazardous materials waste management facilities. Establish the distance requirements for these facilities from public assembly, residential or immobile population and recreation areas and structures. Access impacts from seismic, geologic, and flood hazards, impacts on wetlands, endangered species, air quality and emergency response capabilities; and proximity to major transport routes.

3.9.1.2 *Existing Conditions*

Strata Environmental Services, Inc. conducted a review of aerial photographs, County Assessor's Office records, historical city directories, and agency records to obtain information about the historical uses of the project site. As part of the Phase I Environmental Assessment, records from federal, state, and local agencies were reviewed, and a site reconnaissance was completed to determine any potentially hazardous materials conditions affecting the project site. The historical uses and potential sources of contamination on the project site are discussed below.

Site History

Prior to 1966, the project site was pastureland. Between 1966 and 1969, the site was graded heavily and developed with a portion of the existing JUHSD campus, including the main campus, storage bungalows, and one 1,000-gallon and one 500-gallon underground storage tanks (USTs) that were used for storing waste products, including acid. The use of these USTs ceased in 1979 but remain on-site. Between 1969 and 2002, the site was developed with a General Education Department building (constructed in 1982), two one-story portables (constructed in 1998) and a Comcast relay station (constructed in 2002).

The JUHSD currently uses the site to provide administrative services and teach English and General/Adult Education classes. Other users of the site include Delucca's Tae Kwon Do, Headstart, Young World Preschool, Nemenzo Performing Arts, the Homenetmen Armenian General Athletic Union and Scouts, and religious groups including the Catholic Youth Organization (CYO). The CYO

dispatches, maintains, washes, and fuels a fleet of school buses at a maintenance garage located on-site, which uses a 2,000-gallon diesel fuel aboveground storage tank (AST), a 280-gallon motor oil AST, and a 280-gallon used oil AST. Additionally, Comcast operates an internet relay station that uses a 2,000-gallon diesel fuel AST.

On-Site Sources of Contamination

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (the "Cortese List"). As discussed above, two USTs remain on-site, however, the Phase I did not identify any records of reported spills or find any direct evidence of spills during a site visit. Nevertheless, contamination of the project site from the presence of these USTs cannot be definitely ruled out. Thus, these USTs would be considered a Recognized Environmental Concern (REC). No other environmental concerns, vapor encroachment conditions, RECs, Historic RECs (HRECs), or Controlled RECs (CRECs) were identified by Strata Environmental Services, Inc. in connection with the project site and past uses.[52]

Lead-based paint was banned in 1978, ACMs were beginning to be phased out starting in 1973, and PCBs were banned in 1979. The existing buildings on-site were constructed in between 1966 and 1969; therefore, building materials could contain lead-based paint, ACMs, and PCBs.

Off-Site Sources of Contamination

A review of databases and files from federal, state, and local environmental regulatory agencies was used to determine the potential for the project site to be affected by releases from off-site sources of contamination within the appropriate ASTM search radius. Based on location, distance, regulatory status, and/or apparent groundwater gradient, the Phase I ESA determined these sites were not of environmental concern. Refer to Appendix I for more information regarding nearby off-site sources of contamination.

Airport Hazards

The project site is located within the SFO CLUP Airport Influence Area B, which requires projects to be consistent with the goals and policies of the CLUP. The project site is approximately five miles northwest from the runway termination point of the San Francisco International Airport, beyond the outer boundary of safety compatibility zones and outside of the Community Noise Equivalent Level (CNEL) noise contours for the airport, as delineated in the CLUP.

[52] An REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. An HREC is defined as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. A CREC is defined as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

Wildland Fire Hazards

The project site is in a Local Responsibility Area (LRA) which has not been mapped by CAL FIRE as being within a Very High Fire Hazard Severity Zone (refer to Section 3.20 Wildfire).

3.9.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hazards and hazardous materials, would the project:

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
5) For a project located within an airport land use plan or, where such a plan can talk has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?
6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

3.9.2.1 *Project Impacts*

Impact HAZ-1:	The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

Implementation of the project would result in the redevelopment of the project site with residential and commercial uses. Potentially hazardous materials, including vehicle fuels, oils, and fluids, would be used during construction. Residential and commercial uses do not involve the routine transport, use, or disposal of hazardous materials other than minor quantities required for emergency operations (e.g., diesel generators), cleaning, maintenance, or landscaping.

During construction, all hazardous materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable federal, state, and county standards and regulations (refer to Section 3.9.1.1 Regulatory Framework). Construction-related hazardous materials use would be temporary, and does not constitute routine transport, use, or disposal.

Once operational, the project would be required by California Health and Safety Code 25507(a)(1)(A) to establish and implement a Hazardous Materials Business Plan if the amount of diesel fuel stored on-site for use of emergency generators exceeds 55 gallons. Cleaning supplies, maintenance chemicals, and herbicides and pesticides would be stored and managed in accordance with existing laws and regulations that ensure that the routine transport, storage, use, and disposal of these materials would not result in a significant hazard to the public or environment.

For the reasons stated above, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less Than Significant Impact)**

Impact HAZ-2:	The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Under/Above-Ground Storage Tanks

As discussed under Section 3.9.1.2 Existing Conditions, there are two USTs and three ASTs present on-site that would need to be removed prior to demolition, including 1,000-gallon and 500-gallon waste USTs, one 2,000-gallon diesel fuel ASTs, a 280-gallon motor oil AST, and a 280-gallon used oil AST. The 2,000-gallon diesel fuel AST used by the Comcast Relay Station will remain on-site during and after construction. Prior to the demolition of the existing JUHSD campus, these tanks would be removed. The removal of these USTs and the soil surrounding them has the potential to release hazardous materials into the environment and poses a risk to construction workers, and adjacent residents, and school. The release of hazardous materials contained in the USTs and any contaminated soils into the environment constitutes a significant impact.

Mitigation Measure:

MM HAZ-2.1: Prior to the issuance of demolition, grading, or building permits for projects on Parcels C-E, the applicant shall remove the existing underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with the San Mateo County Department of Environmental Health's (SMCDEH) Underground Storage Tank Program and Aboveground Petroleum Storage Tank Program. During removal of the ASTs and USTs, contractors shall observe for staining and spilled contaminants. If stains and/or spills are observed, an Environmental Professional shall be retained to collect soil samples for laboratory analysis in accordance with commonly accepted environmental protocols. If contaminants are identified at concentrations exceeding applicable screening levels published by the RWQCB, DTSC and/or EPA[53], appropriate mitigation measures, such as, but not limited to, a Soil Management Plan and Health Safety Plan, shall be incorporated into the

[53] Note that naturally occurring background concentrations of metals, such as arsenic, amongst others, in soil may exceed their respective screening levels. Regulatory agencies generally do not require cleanup of soil to below background concentrations. Thus, concentrations of metals are compared to regional published background concentrations to establish if regulatory agency approval is warranted.

demolition permit. Approval by an appropriate regulatory agency (i.e., RWQCB, DTSC or SMCDEH) shall be obtained prior to conducting earthwork activities in the vicinity of the impacted soil. The applicant shall provide documentation of the safe removal of all existing USTs and ASTs consistent with SMCDEH requirements to Director of Economic and Community Development or Director's designee for review and approval.

With implementation of MM HAZ-2.1, impacts associated with the removal of existing USTs and ASTs would be less than significant.

Demolition

The project proposes to demolish the existing JUHSD campus, a portion of which was constructed prior to the phasing out of ACMs that occurred between 1973 and 1983 (refer to Section 3.9.1.1 Regulatory Framework). The JUHSD campus previously underwent asbestos abatement between 1989 and 1993, and again between 2000 and 2001. An Asbestos Hazard Emergency Response Act inspection was conducted in 2019 which found ACMs to be present throughout the site. Additionally, as a portion of the JUHSD campus was constructed prior to the prohibitions on the use of lead-based paint and PCBs, surfaces coated with lead-based paint and building materials containing PCBs may also be present.

Prior to demolition, NESHAP requires the removal of all regulated (i.e. friable) ACMs and certain non-friable ACMs which might be rendered friable before demolition activities that might disturb ACMs occurs.[54] Additionally, BAAQMD requires all materials that contain more than one percent of asbestos are required to be removed prior to demolition in accordance with BAAQMD standards. All demolition activities would be completed in accordance with the California Division of Occupational Safety and Health standards contained in Title 8, California Code of Regulations, Section 1529, to protect workers from asbestos exposure.

In order to protect construction workers, nearby sensitive receptors, and the environment, the California Division of Occupational Safety and Health requires a building survey that includes sampling and testing to be completed prior to demolition that identifies and quantifies building materials containing lead-based paint. All building materials containing lead-based paint are required to be removed prior to demolition in accordance with the California Division of Occupational Safety and Health Title 8, California Code of Regulations, Section 1532.1. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.

The project proposes to demolish the on-site buildings, which may have materials that contain PCBs. During demolition, PCBs in building materials could be released and thereby exposed to stormwater runoff from the project site during rain events. To address this risk, applicants for a demolition permit must comply with the City's PCB Demolition Program with their permit application.[55] If on-site buildings do contain PCBs that exceed threshold limits, the project applicant must follow

[54] Friable materials are easily crumbled and may become airborne during demolition activities if not removed prior to demolition.
[55] City of Daly City. *Green Infrastructure Program*. Page 7. July 2019.

applicable federal and state laws, which may include reporting to such agencies as the EPA, RWQCB, and DTSC, who may require additional sampling and abatement of PCBs consistent with state and federal requirements.

Compliance with state and regional regulations would ensure that all materials containing hazardous quantities of asbestos, lead-based paint, and PCBs are identified and removed prior to demolition. As such, the proposed demolition of the existing JUHSD campus would not create a significant hazard through the release of ACMs, lead-based paint, or PCBs into the environment.

Construction

As discussed under Section 3.9.1.2 Existing Conditions, the project site was historically used as pastureland up until 1966, at which point it was heavily graded and developed and then used for a variety of educational and religious services, bus storage, maintenance, and fueling, and as a Comcast relay station. The Phase I ESA identified one REC, associated with the existing USTs on-site. As such, ground-disturbing activities associated with implementation of the project (e.g. excavation, grading, etc.) could disturb potentially contaminated soil that could become airborne and pose a health hazard to construction workers, nearby sensitive receptors, or the environment. With implementation of MM HAZ-2.1, however, the impact would be reduced to a less than significant level.

Operation

As discussed under Impact HAZ-1, the proposed residential and commercial uses would not routinely transport, use, or dispose of hazardous materials beyond small quantities of diesel fuel, cleaning supplies, maintenance chemicals, and herbicides and pesticides, all of which would be stored and managed in accordance with existing federal and state laws and regulations (refer to Section 3.9.1.1 Regulatory Framework). Accordingly, operation of the project would not create a significant hazard to the public or the environment due to the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

Impact HAZ-3:	The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant Impact with Mitigation Incorporated)**

The project site is within a quarter mile of one existing school, the Summit Shasta Charter School, which is located at 905 Campus Drive adjacent to the plan area. The project's proposed residential and commercial uses would not emit hazardous emissions, and as discussed under Impact HAZ-1 and Impact HAZ-2, compliance with federal, state, and county regulations (refer to Section 3.9.1.1 Regulatory Framework) and implementation of MM HAZ-2.1 would ensure that hazardous materials used during construction and operation of the project's proposed residential and commercial uses would not create a significant hazard to the public or environment. **(Less Than Significant Impact with Mitigation Incorporated)**

Impact HAZ-4:	The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. **(No Impact)**

As discussed in Section 3.9.1.2 Existing Conditions, the project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. **(No Impact)**

Impact HAZ-5:	The project would be located within an airport land use plan. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. **(Less than Significant Impact)**

The project site is located approximately five miles northwest of SFO within Airport Influence Area B. As noted in Section 3.9.1.2 Existing Conditions, the proposed project would be required to be consistent with the goals and policies of the SFO ALUCP. Additionally, projects that would occur within mapped noise and safety compatibility zones would be subject to additional restrictions and requirements. The project is outside of the mapped noise and safety compatibility zones where new land uses may conflict with noise generated by airport operations or aircraft accidents are likely to occur.

As noted in Section 3.9.1.1 Regulatory Framework, FAR Part 77 sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the FAA be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above ground. The project site is located on terrain that is 200 feet or greater above ground level. As such, the project is required to file FAA Form 7460-1, Notice of Proposed Construction or Alteration with the FAA at least 30 days prior to construction so that the project can be reviewed for aviation compatibility, or a signed exemption form pursuant to 14 CFR Part 77.9(b) be submitted prior to construction. On July 22, 2021, the Board of Directors of the San Mateo County Airport Land Use Commission determined that the proposed Precise Plan (including the Parcel B Development project) is consistent with the SFO ALUCP and FAR Part 77 regulations. **(Less Than Significant Impact)**

Impact HAZ-6:	The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

The proposed project would not impair or physically interfere with any adopted emergency response or evacuation plan. All project development would be constructed to comply with all applicable state and local building and fire codes. During construction and operation, roadways would not be blocked such that emergency vehicles would be unable to access the site or surrounding properties. Existing pedestrian walkways, bike paths, and handicap access pathways would be maintained. During

operation, emergency ingress and egress to the project site would be provided by the surrounding roadways. Therefore, the proposed project would not impair the implementation of or physically interfere with any emergency response or evacuation plan. **(Less Than Significant Impact)**

Impact HAZ-7:	The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. **(Less than Significant Impact)**

As discussed in Section 3.9.1.2 Existing Conditions, the project site is located in an urbanized area of Daly City and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Further, as described above under Impact HAZ-6, all project development would be constructed in accordance with current state and local building and fire codes to ensure structural stability and safety and the final site design would be reviewed by the Daly City Fire Department for consistency with applicable fire department standards. **(Less Than Significant Impact)**

3.9.2.2 *Cumulative Impacts*

Impact HAZ-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact. **(Less than Significant Cumulative Impact)**

Projects in the cumulative scenario could be located on properties where hazardous materials may have been stored, used, and/or transported. These hazardous materials (such as gasoline, oil, propane, and various chemicals in manufacturing) may have been stored on these sites in aboveground or underground tanks. Storage tanks can leak, often resulting in soil and/or groundwater contamination. If groundwater is affected, it can impact properties downgradient of the spill. In addition, development of some of the sites would require demolition of existing buildings that may contain ACMs and/or lead paint. Demolition of these structures could expose construction workers or other persons in the vicinity to harmful levels of asbestos or lead.

Based on these conditions, which are present on most cumulative project sites to varying degrees, impacts could occur in the cumulative scenario as a result of exposure of residents and/or workers to substances that have been shown to adversely affect health. However, the impacts would be limited to individual sites, and not have the potential to contribute to cumulative impacts unless other projects were occurring in the immediate vicinity. For all cumulative scenario projects, mitigation measures will be implemented as a condition of approval to lessen risks associated with exposure to hazardous materials. Further, adherence to applicable existing local, state, and federal laws and regulations related to hazardous materials would lessen the potential for cumulative impacts.

If chemical releases have occurred in the cumulative scenario, and depending upon the extent of the release, contaminated soils could be excavated and transported to appropriate landfills or treated on-site. If groundwater is affected, remediation and ongoing groundwater sampling both on the site and on surrounding downgradient properties could be warranted. However, these conditions would be localized and limited to a given project site, and not have the potential to combine with other projects

unless they are adjacent. Finally, determining the extent of asbestos and lead paint contamination would also be required prior to building demolition and site grading and, if present, such substances would be handled and disposed of in a manner that minimizes human exposure. These impacts, too, would be limited to each project site or immediately surrounding sites under construction. Therefore, cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts. **(Less than Significant Cumulative Impact)**

3.10 HYDROLOGY AND WATER QUALITY

The following discussion is based, in part, on a Stormwater Memo prepared by BKF Engineers, dated May 2021, and a Water Supply Assessment prepared for the project by Brown and Caldwell, on behalf of the Daly City Department of Water and Wastewater Resources and dated December 2021. Copies of these reports are attached to this EIR as Appendix J and Appendix M, respectively.

3.10.1 Environmental Setting

3.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the NPDES permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards. The project site is within the jurisdiction of the San Francisco Bay RWQCB.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[56] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g. rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if they do not meet the minimized size threshold, drain into tidally influenced areas or directly into the Bay, or drain into hardened channels, or if they are infill projects in subwatersheds or catchment areas that are greater than or equal to 65 percent impervious.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

[56] MRP Number CAS612008

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to hydrology and water quality and are applicable to the proposed project.

Policy/Task	Description
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with the applicable Municipal Regional Stormwater Permit by incorporating controls that reduce water quality impacts over the life of the project in ways that are both technically and economically feasible, and reduce pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.5	Ensure the regular inspection of stormwater treatment facilities as required by the Municipal Regional Stormwater NPDES Permit.
Policy RME-9	Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit, i.e., reduction of Vehicle Miles Traveled (VMT) on local and regional roadways to the extent permitted under the Municipal Regional Stormwater Permit.
Task RME-9.1	Continue to explore low-impact development credits for high density transit-oriented development within the City's established Priority Development Areas with the Regional Water Quality Control Board.
Policy SE-2.1	Protect the City of Daly City from unreasonable risk to life and property caused by flood hazards by designing and constructing drainage facilities to improve the flow capacity of the City's water system in order to accommodate the storm water runoff generated by a 100-year storm.

Daly City Municipal Code

Chapter 13.20 – Well Standards

Chapter 13.30 includes standards intended to ensure that groundwater beneath the City will not be polluted or contaminated. The chapter contains requirements for construction, reconstruction, repair and destruction of water wells, cathodic protection wells, and monitoring wells. Permits are also required for these activities as well as for excavations that may intersect groundwater.

Title 14 – Storm Water Management and Discharge Control

Title 14, also known as the "City of Daly City Stormwater Management and Discharge Control Ordinance", prohibits non-stormwater discharges to the City storm drain system. The purpose of the Ordinance is to eliminate non-stormwater discharges to the municipal separate storm drain system, control the discharge of spills, dumping or disposal of materials other than stormwater, and reduce pollutants in stormwater discharges into the storm drain system to the maximum extent practicable. Chapter 14.12 gives the City the authority to inspect projects to enforce any of the provisions of Title 14.

Chapter 15.62 – Grading, Erosion, and Sediment Control

Chapter 15.62, also known as the City of Daly City Grading, Erosion and Sediment Control Ordinance, sets forth rules and regulations to control site clearing, vegetation disturbances, land-fills, land excavations, soil storage, and other such activities which may cause sediments and other pollutants to enter the public drainage facilities. The chapter establishes the regulations, permit requirements, procedures for administration and enforcement of permits to properly control the aforementioned activities to preserve and enhance public health, safety and environment. Section 15.62.230 requires the permittee to maintain a copy of the permit, approved plans and reports and make these available for city inspection. Section 15.62.270 gives the City engineer authority to suspend or revoke a permit for violation or non-compliance with Chapter 15.62.

Chapter 17.41 – Water Conservation in Landscaping

Chapter 17.41 requires new construction projects with landscaping of 500 square feet or greater to complete a landscape project application and comply with the landscape and irrigation maintenance and stormwater management requirements outlined in this chapter.

3.10.1.2 *Existing Conditions*

Hydrology and Drainage

The project site is located within the Colma Creek Watershed, which drains to the San Francisco Bay Area via Colma Creek, the majority of which is either channelized or underground to allow for urban development.[57]

The project site overall is southeast sloping, with the western portion of the site featuring a 100-foot high moderately sloped hillside cut that descends to the relatively flat existing Serramonte Del Rey campus, which extends east to a 65- to 50-foot high slope that descends to Callan Boulevard. Surface runoff on-site is collected in drains or inlets and conveyed via below grade pipes to the storm drain outfall, which is located in the existing parking lot near the main vehicular entrance at Serramonte Boulevard. The outfall discharges to an existing 24-inch storm drain main in Serramonte Boulevard that flows northeast before being discharged into Colma Creek, approximately 1.3 miles east of the project site.

The approximately 22-acre project site currently consists of 413,505 square feet (50 percent) of impervious surfaces and 415,450 square feet (50 percent) of pervious surfaces.

Surface Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as "non-point" source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Surface runoff from the Precise Plan area is collected by storm drains and discharged to Colma Creek. Runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, and animal feces), pesticides, litter, and heavy metals. In

[57] City of Daly City. *General Plan Update, Final Environmental Impact Report*. February 2013.

sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain. Colma Creek is currently listed on the 303(d) list for trash.[58, 59]

Groundwater

The Colma Creek Watershed is located in the Westside Groundwater Basin, which has not been identified as a groundwater basin in a state of overdraft.[60]

As discussed in Section 3.8.1.1 Existing Conditions, groundwater in the project vicinity is projected to flow generally south and east towards the San Francisco Bay at a depth of greater than 50 feet bgs.[61] Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Flooding and Other Hazards

The project site is designated as Flood Zone X according to FEMA Flood Insurance Rate Maps. Areas within Flood Zone X have a 0.2 percent annual chance of flooding, with average depths of less than one foot or with drainage areas less than one square mile. No special flood hazard restrictions apply to Zone X.

Tsunami inundation maps prepared by the California Department of Conservation indicate that the project site is outside of tsunami hazard areas. Seiches can occur in semi- or fully-enclosed bodies of water and inundate adjacent areas; the nearest semi- or fully-enclosed water body is Lake Merced, located approximately 2.75 miles north of the Precise Plan area.

3.10.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hydrology and water quality, would the project:

1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - result in substantial erosion or siltation on- or off-site;

[58] The Clean Water Act (CWA), Section 303, establishes water quality standards and Total Maximum Daily Load (TMDL) programs. The 303(d) list is a list of impaired water bodies.
[59] California Environmental Protection Agency, State Water Resources Control Board. "Impaired Water Bodies". Accessed September 29, 2021. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml
[60] California Department of Water Resources. "State Groundwater Management Act Basin Prioritization Dashboard". Accessed September 29, 2021. https://gis.water.ca.gov/app/bp-dashboard/final/
[61] Strata Environmental Services, Inc. *Phase I Environmental Site Assessment, Serramonte del Rey Campus*. February 2020.

- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
- impede or redirect flood flows?

4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

3.10.2.1 *Project Impacts*

Impact HYD-1:	The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

Construction Impacts

Implementation of the proposed project would temporarily impact surface water quality during construction. Future development would require demolition, grading, and paving of the project sites, activities that temporarily increase the amount of unconsolidated materials on the site. Construction of the below grade parking garages, new buildings, and other improvements (including utility connections) would require excavation. Grading and excavation activities could increase erosion and sedimentation, resulting in sediment, soil, and associated pollutants that could be carried by runoff into natural waterways and possibly increasing sedimentation impacts to local creeks or the San Francisco Bay.

All construction or demolition activity that results in land disturbances equal to or greater than one acre must obtain coverage under the Construction General Permit, which is administered by the SWRCB. The Parcel B Development project would disturb greater than one acre of land and, therefore, would require coverage under the Construction General Permit and submit a SWPPP and NOI to the SWRCB. Any future development on Parcels C-F disturbing more than one acre would similarly require coverage under the Construction General Permit. The City requires project applicants to submit a stormwater management plan that illustrates full compliance with the MRP. This will require the project to include stormwater controls such as site design measures, source controls, treatment measures, low impact development, hydromodification management, and construction best management practices. These policies are reinforced by the discharge prohibitions and requirements for reducing pollutants in storm water in Title 14 and Title 15 of the Municipal Code. Adherence to regulations, policies and standards will ensure that impacts to water quality will be less than significant.

Post-Construction Impacts

As discussed above, the 22-acre project site currently consists of 413,505 square feet (50 percent) of impervious surfaces and 415,450 square feet (50 percent) of pervious surfaces. Full buildout of the

proposed project would result in approximately 502,050 square feet (60 percent) of impervious surfaces and approximately 332,340 square feet (40 percent) of pervious surfaces, resulting in an overall increase of 88,545 square feet of impervious surfaces. To reduce water quality impacts post-construction, the project is required to comply with the MRP including Provision C.3 of the MRP regarding LID site design. LID features could include self-treating and self-retaining areas to allow on-site retention, percolation, and evaporation of stormwater runoff.

The project proposes to satisfy the MRP and Provision C.3 of the MRP with an approach that would allow Parcel B to 'overcompensate' by incorporating additional treatment beyond what would otherwise be required of that Parcel, and accrue treatment 'credits' that can be applied to other parcels (Parcels C-F) that would have more difficulty meeting the requirement solely within the boundaries of each parcel. The proposed retention structure within Parcel B would provide a 12,830 square-foot self-retaining stormwater treatment area that would collect water from the entire project site. This would ensure that stormwater discharge from the project site, at full buildout during a 10-year storm event, would match pre-construction conditions and not increase stormwater runoff from the project site. In addition, the project proposes for each phase of development during buildout, pre- and post-construction areas of impervious surfaces would be calculated within the phase limits to determine if there would be an increase in the peak runoff rate compared to existing conditions. If there is a calculated increase in peak runoff rate, a temporary stormwater detention system, such as a detention basin or below-grade detention pipe, would be located within the footprint of the undeveloped parcels until the phase can be connected to the Parcel B retention structure. At no point during the development process would the project increase the peak rate of stormwater runoff leaving the site.

Based on the above discussion, future development under the proposed Precise Plan, with compliance with existing regulations (including the NPDES and City's Grading, Erosion and Sediment Control Ordinance), would not result in significant water quality impacts. **(Less Than Significant Impact with Mitigation Incorporated)**

Impact HYD-2:	The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

Daly City receives a large portion of its water supply from the San Francisco Public Utilities Commission (SFPUC) and supplements the SFPUC supply with groundwater pumped from six local wells. During dry periods, groundwater makes up a larger proportion (up to 49 percent in fifth year consecutive dry year) of the City's supply.[62] The proposed project, consisting of 1,235 residential units and up to 14,000 square feet of neighborhood-serving retail/commercial uses, would not be expected to result in the need for excessive groundwater pumping from the local wells during normal years; however, during single and multiple dry-years, the City (with and without the project) is expected to experience shortfalls in water supply (see water supply discussion in Section 4.18

[62] Brown and Caldwell. *Water Supply Assessment for the Jefferson Union High School District Master Plan Project*. December 2021. Page 4-3.

Utilities and Service Systems).[63] While shortfalls may occur, groundwater pumping within the Westside Groundwater Basin would not increase beyond the City' current allotment and water supplies would be procured from other sources.

There are no designated groundwater recharge areas within the Westside Groundwater Basin. The principal sources of recharge are direct infiltration of rainfall, infiltration of irrigation water, and leakage from water and sewer pipes.[64] As discussed in Impact HYD-1 above, the project would increase impervious surfaces on the site by 88,545 square feet, resulting in a corresponding decrease in infiltration capacity. The project, however, would include numerous self-retaining, self-treating, and bioretention areas within the landscaping, consistent with the MRP and Provision C.3, that would provide opportunities for stormwater infiltration. The project would therefore not be expected to substantially interfere with groundwater recharge or impede groundwater management of the basin. **(Less Than Significant Impact)**

Impact HYD-3:	The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. **(Less than Significant Impact with Mitigation Incorporated)**

There are no waterways present on the project site; therefore, future development of the Precise Plan would not alter the course of a stream or river. As discussed above under Impact HYD-1, implementation of proposed Precise Plan would result in an increase in impervious surfaces compared to existing conditions by 88,545 square feet. An increase in impervious surfaces would result in a corresponding increase in surface runoff from the project site. The project, however, would comply with applicable regulations, including the statewide Construction General Permit, MRP (including Provisions C.3), and City ordinances for controlling pollutants. In addition, the proposed storm drain system would retain stormwater on-site to match pre-project flow conditions under the 10-year storm event. Thus, the project would not result in substantial erosion, siltation, flooding, significant water quality impacts, or exceed the capacity of existing or planned stormwater drainage systems. **(Less than Significant Impact)**

Impact HYD-4:	The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(No Impact)**

The project site is not located in a 100-year floodplain and, therefore, would not place housing within a 100-year flood hazard area or impede or redirect flood flows within a 100-year flood hazard area.

[63] Ibid. Page 4-7.
[64] *San Francisco Bay Hydrologic Region Westside Groundwater Basin,* California's Groundwater Bulletin 118, January 20, 2006.

The project site, due to its topography, is not subject to seiche, tsunami, or mudslide hazards. **(No Impact)**

Impact HYD-5:	The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

As previously described, the project site is located within the Westside Groundwater Basin. There are existing groundwater management plans for the northwestern portion (North Westside Groundwater Basin Management Plan) and the southern portion (South Westside Basin Groundwater Management Plan) of the Basin. Although the project site technically lies outside of the boundaries of these two management plans, it is within the City of Daly City, which would be the water service provider for the project and is a participant in the South Westside Basin Groundwater Management Plan. The City would implement the groundwater protection and management goals and objectives of the Plan. The project, which proposes to redevelop the existing Serramonte Del Rey Campus into a multi-family housing development with ground-floor retail, would not conflict with or obstruct the implementation of the Plan in that the development of the site would not rely on groundwater beneath the site for water supply, nor would the project require dewatering. While the project would increase impervious surfaces by 88,545 square feet compared to existing conditions, it would not lead to a significant reduction in groundwater infiltration potential. **(Less Than Significant Impact)**

3.10.2.2 *Cumulative Impacts*

Impact HYD-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact. **(Less than Significant Cumulative Impact)**

Water Quality, Groundwater, and Drainage Impacts

The geographic area for cumulative hydrology and water quality impacts includes the project site and the surrounding area, as well as other development within the Colma Creek watershed. Several of the cumulative projects identified in Table 3.0-1 would involve redevelopment of existing or previously developed sites that contain substantial impervious surfaces, and these projects would be required to conform to applicable General Plan goals, policies, and strategies regarding stormwater runoff, infrastructure, and flooding. All projects within the City, including those identified in Table 3.0-1, would also be required to comply with applicable requirements in the statewide Construction General Permit, MRP (including Provisions C.3), City ordinances, and NPDES permits standards to avoid hydrology and water quality impacts or reduce them to a less than significant level. For these reasons, the project would not have a cumulatively considerable water quality, groundwater, or drainage impact.

Flooding and Inundation Impacts

As discussed under Impact HYD-4, the project site is not subject to significant flood or inundation hazards; therefore, the project would not result in a considerable contribution to significant

cumulative impact related to release of pollutants due to flooding and inundation. **(Less than Significant Cumulative Impact)**

3.11 LAND USE AND PLANNING

3.11.1 Environmental Setting

3.11.1.1 *Regulatory Framework*

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. All future development allowed by the project would be subject to conformance with applicable General Plan policies, including those listed below.

Policy/Task	Description
Policy LU-4	Provide regulatory incentives for developers to construct higher-density mixed use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.
Policy LU-8	Ensure that landscape and hardscape improvements made to all residential properties are environmentally sound and do not negatively impact existing neighborhood aesthetics.

Daly City Municipal Code

The Zoning Ordinance is provided in Title 17 of the Daly City Municipal Code. The Zoning Ordinance helps promote public health, safety, morals, convenience, comfort, prosperity and general welfare of residents in the City.

3.11.1.2 *Existing Conditions*

General Plan Land Use Designation

The majority of the project site has a General Plan land use designation of C-O (Commercial – Office) while a smaller portion of the site in the northwest corner (Parcel A Development project) has a General Plan land use designation of R-HD (Residential-High Density). The C-O designation allows for office and locally serving commercial uses such as health and fitness centers, small scale printing and photocopying businesses, and eating and drinking establishments. The floor-to-area ratio (FAR) allowed for the C-O designation ranges from 1.0 to 3.5. The R-HD designation allows for multi-family residential buildings between 35.1 and 50 dwelling units per acre.

Zoning Ordinance

Similar to the General Plan Designation, the majority of the project site is zoned PD-31 (Planned Development District) while a smaller portion of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units and approximately 700,000 square feet of office space. The PD-31A zoning was specifically created to allow for the

construction of the Parcel A Development project, which has been developed with 122 multifamily units intended for Jefferson Union High School District (JUHSD) employees.

Existing Land Uses

The northwest corner of the project site has been developed with the approved Parcel A Development project (JUHSD Faculty and Staff Housing project). The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSD demonstration garden. The remainder of the project site it developed with surface parking lots and a one- to two-story concrete building that serves as the existing JUHSD district office and adult education buildings.

Surrounding Land Uses

The project site is surrounded by residential development to the north, northeast, south, and west. The residences to the north and northeast are two- to three-story apartment buildings made of stucco and wood construction. The residences to the south (Serramonte Ridge Apartment Homes) are three- to four-story apartment buildings also made of stucco and wood construction. The residences to the west are two-story, single-family homes made of wood construction.

Southeast of the project site is the Summit Shasta High School, which is developed with one- to two-story concrete education buildings. East of the project site across Callan Boulevard is a Chinese cemetery consisting of mostly open space and gravestones.

3.11.2 Impact Discussion

For the purpose of determining the significance of the project's impact on land use and planning, would the project:

1) Physically divide an established community?
2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.11.2.1 *Project Impacts*

Impact LU-1:	The project would not physically divide an established community. **(Less than Significant Impact)**

The project site is located in a developed urban area with residential uses to the north and west, and a variety of institutional uses to the south and east. Implementation of the proposed project would result in the construction of 1,235 residential units (Parcel A has already been constructed) and up to 14,000 square feet of neighborhood-serving retail/commercial uses on the site. The layout and design of the project does not include any features that would physically divide the community (e.g., impeding roadways or sidewalks). In addition, implementation of the project would include right-of-way and pedestrian and bicycle improvements that would promote mobility in the project area. For

these reasons, the project would not physically divide an established community. **(Less Than Significant Impact)**

Impact LU-2:	The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

The project site is located in the Serramonte Planning Area, which is the newest large-scale subdivision in Daly City. The project site is designated in the General Plan as C-O which allows for office and locally-serving commercial uses. In order for the proposed Precise Plan to comply with the General Plan, a General Plan Amendment is proposed to C-MU (Commercial – Mixed Use), which allows vertical mix of commercial and residential uses (e.g., retail or restaurant uses at the street level and residential uses at levels above the street). The FAR of C-MU designated areas generally ranges from 1.0 to 6.0.

The proposed project would comply with the City's Inclusionary Housing Ordinance (Chapter 17.47 of the City's Municipal Code), which requires 10 percent of rental units to be low-income units. According to the Ordinance, a lack of new affordable units will have a substantial negative impact on the environment because: (1) housing will have to built elsewhere, far from employment centers and therefore commutes will increase, causing increased traffic and transit demand and consequent noise and air pollution; and (2) City businesses will find it more difficult to attract and retain the workers they need. Affordable housing policies contribute to a healthy job and housing balance by providing more affordable housing close to employment centers.

The proposed project would construct housing within the City of Daly City and it aligns with the City's Inclusionary Housing Ordinance in providing at least 10 percent affordable housing. In addition, the proposed project is subject to mitigation measures to minimize environmental impacts as discussed throughout this EIR, and would be consistent with General Plan policies adopted to avoid or mitigate environmental effects as described in the individual resource sections of this EIR. For these reasons, the proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

3.11.2.2 *Cumulative Impacts*

Impact LU-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact. **(Less than Significant Cumulative Impact)**

Cumulative scenario projects in the City are subject to General Plan goals, policies, and action statements that require appropriate buffers, edges, and transition areas between land uses. In addition, setback, design, and operational requirements of the City's Zoning Ordinance minimize land use compatibility issues that might result in physical land divisions. For these reasons, a cumulative

impact related to dividing an established community would not occur, consistent with the conclusions in the General Plan EIR.

Cumulative scenario projects in the City of Daly City would go through the City development review process. Projects would be analyzed for conformance with applicable policies adopted for the purpose of avoiding or mitigating an environmental impact though the CEQA review process. The project, therefore, in combination with cumulative development, would not result in significant policy conflict impacts and would not contribute to a significant cumulative land use impact as a result of conflict with policies to avoid a significant environmental impact. **(Less than Significant Cumulative Impact)**

3.12 MINERAL RESOURCES

3.12.1 Environmental Setting

3.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

3.12.1.2 *Existing Conditions*

According to the Mineral Lands Classification Map of the SMGB, the City of Daly City does not include any mineral extraction areas of statewide importance.[65]

3.12.2 Impact Discussion

For the purpose of determining the significance of the project's impact on mineral resources, would the project:

1) Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
2) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

3.12.2.1 *Project Impacts*

Impact MIN-1:	The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. **(No Impact)**

The project site is currently developed with JUHSD district office buildings, surface parking, a demonstration garden, and the recently constructed Parcel A JUHSD Staff and Faculty Housing project. As discussed under Section 4.12.1.2 Existing Conditions, the project site does not contain any known mineral resources. Therefore, the project would have no impact on the availability of known, valuable mineral resources. **(No Impact)**

[65] California Department of Conservation. *Designated Areas Update San Francisco South Quadrangle.* Map. 1996.

Impact MIN-2:	The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. **(No Impact)**

See response to Impact MIN-1 above. **(No Impact)**

3.12.2.2 *Cumulative Impacts*

Impact MIN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

Since the project would not result in impacts to mineral resources, the project would not contribute to a cumulative impact to mineral resources. **(No Cumulative Impact)**

3.13 NOISE

The following discussion is based, in part, on a noise and vibration assessment prepared for the project by Illingworth & Rodkin, Inc. A copy of this report, dated June 2022, is attached to this EIR as Appendix K.

3.13.1 Environmental Setting

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[66] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

3.13.1.1 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact

[66] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 3.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 3.13-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83

Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual.* September 2018.

State

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

California Green Building Standards Code

For commercial uses, CALGreen (Section 5.507.4.1 and 5.507.4.2) requires that wall and roof-ceiling assemblies exposed to the adjacent roadways have a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the commercial property falls within the 65 dBA L_{dn} or greater noise contour for a freeway or expressway, railroad, or industrial or stationary noise source. The state requires interior noise levels to be maintained at 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation at a proposed commercial use.

Local

Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport

As discussed in more detail in Section 4.10 Land Use, the project site is located within the Airport

Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the ALUCP. The site is located outside of the SFO 65 dB CNEL noise contour.

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to noise and vibration impacts and are applicable to the proposed project.

Policy/Task	Description
Policy NE-1	Use the future noise contour map to identify existing and potential noise impact areas.
Task NE-2.1	Use the Noise Control Guidelines to assess the suitability of a site for new development in combination with the noise contours to accurately identify areas that may need additional noise study and mitigation. Noise mitigations include additional insulation, double glazing of windows and increasing building setbacks from the noise source. Mitigations should also be creative and attractive whenever possible and appropriate. Creative noise mitigation measures can include incorporation of fountains using water to mask freeway noise and noise walls of an appropriate scale painted with decorative murals.
Policy NE-3	Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas
Task NE-3.1	Continue to enforce the environmental noise requirements of the State Building Code (Title 24).
Policy NE-4	Maintain a noise level not in excess of 75 dBA CNEL in open space, parks, and tot lots, including outdoor activity areas such as outdoor entertainment or green space of multi-family projects.
Policy NE-5	Maintain the City's current standard of 75 dBA CNEL for office, commercial, and professional areas.
Task NE-5.1	Additional noise studies should be conducted in "Conditionally Acceptable" noise environments to ensure adequate mitigation features are employed. Usually conventional construction with closed windows and fresh air supply systems will maintain a healthy noise environment.
Policy NE-6	Require new development to perform additional acoustical studies in noise environments that are identified as 'Conditionally Acceptable' or 'Normally Unacceptable' to the Guidelines.
Policy NE-9	Work to ensure that the expansion of or changes to existing land uses do not create additional noise impacts for sensitive receptors in the vicinity of the project from intensification or alteration of existing land uses by requiring applicants.
Task NE-9.1	Depending upon the hours of operation, intensity of use, and the location of sensitive receptors in the area, the expansion or change of use could cause noise impacts.

Policy/Task	Description
	Acoustical studies should be performed, at the applicant's expense, during the discretionary and environmental review processes and conditions should be placed on the project accordingly.
Task HE-4.2	For all development proposals with the 65dB CNEL noise contour, the City shall require a noise study that identifies the proposed project's compliance with requirement of Task 4.1. If the project qualifies for review under the California Environmental Quality Act (CEQA), the City shall incorporate the noise study and any mitigation measures into the CEQA document and shall adopt findings that the project, as conditioned, complies with the interior noise level requirement.
Task NE-11.3	Require all future development within the Airport Influence Area B boundary for San Francisco International Airport to conform to the relevant height/airspace protection, aircraft noise, and safety policies and land use compatibility criteria contained within the most recent adopted version of the comprehensive airport/land use compatibility plan (ALUCP) for the environs of San Francisco International Airport.

Daly City Municipal Code

Title 9 – Public Peace, Morals and Welfare

Chapter 9.22 of the Daly City Municipal Code contains language to protect residents from excessive noise exposure. Section 9.22.010 prohibits an individual from causing a disturbance such that it disturbs the public peace off-site. Section 9.22.020 states that no person shall maintain, operate, or conduct any loudspeaker or amplifier in such a manner as to cause the sound to be projected outside any building or out of doors in any part of the City without first obtaining a permit to do so. Section 9.22.030 deals more specifically with noise and states that between the hours of 10:00 p.m. and 6:00 a.m. no person shall cause, create, or permit any noise which may be heard beyond the confines of the property of origin. The Police Department enforces Chapter 9.22 of the Municipal Code.

Title 15 – Buildings and Construction

Section 15.00.130 requires any home, constructed after January 1, 1993 or renovated at a cost equal to twenty-five percent or more of the value of the home and located within the 65 CNEL (FAA approved) contour map that is illustrated on the Aircraft Noise Soundproofing Project Area Map, must be insulated to meet standards applied in noise insulation programs supported by the Federal Aviation Administration. The project site is not within the 65 CNEL noise contour.

Title 17 – Zoning

Title 17 of the Daly City Municipal Code provides for discretionary review of projects through the use permit and variance process. An application for development is analyzed in light of many concerns including comparing the proposed use against the noise contours and Noise Compatibility Guidelines. The Planning Division attaches conditions of project approval to reduce noise impacts to future occupants of the proposed development as well as conditioning times construction activities may occur in order to reduce noise impacts to surrounding land uses.

3.13.1.2 *Existing Conditions*

The project site is bounded by Serramonte Boulevard and residences to the north, a variety of institutional, quasi-public, and commercial uses to the east and south, and residences to the south and west. The primary noise source in the project area is traffic from the surrounding highways and roadways and aircraft departures from SFO.

A noise monitoring survey was conducted between December 7, 2021 and December 9, 2021 to document existing noise conditions within and around the project site. The noise monitoring survey included three long-term noise measurements (LT-1 through LT-3) and four short-term noise measurements (ST-1 through ST-4). Noise measurement locations are shown in Figure 3.13-1.

Long-term noise measurement LT-1 was made south of the proposed project, in the developed portion of the 1985 Precise Plan adjacent to the Serramonte Ridge Apartment Homes complex, about 66 feet west of the Campus Drive centerline and about 400 feet northwest of the Hickey Boulevard centerline. Hourly average noise levels typically ranged from 59 to 65 dBA L_{eq} during daytime hours and from 49 to 61 dBA L_{eq} at night.

Long-term noise measurement LT-2 was conducted just south of the proposed project near the eastern edge of the developed portion of the 1985 Precise Plan and adjacent to the Young World Preschool & Childcare parking lot, about 132 feet west of the Callan Boulevard centerline. Hourly average noise levels at this location typically ranged from 59 to 65 dBA L_{eq} during the day and from 46 to 62 dBA L_{eq} at night.

Long term noise measurement LT-3 was conducted at the northern portion of the proposed project in Parcel B, about 85 feet south of the Serramonte Boulevard centerline. Hourly average noise levels at this location typically ranged from 62 to 67 dBA L_{eq} during the day and from 47 to 65 dBA L_{eq} at night.

The results of the four short-term noise measurements and their locations are summarized in Table 3.13-2 below.

Table 3.13-2: Summary of Short-Term Measurements (dBA)

Noise Measurement Location	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	$L_{eq(10)}$
ST-1: ~250 feet from Callan Boulevard Centerline, 230 feet from the Serramonte Boulevard Centerline	65	62	59	55	53	56
ST-2: ~40 feet from Serramonte Boulevard Centerline	79	70	65	60	56	63
ST-3: ~80 feet from St. Francis Boulevard Centerline	63	59	56	54	52	55
ST-4: ~100 feet from the Campus Drive Centerline	75	74	62	52	47	61

NOISE MONITORING LOCATIONS | FIGURE 3.13-1

3.13.2 Impact Discussion

For the purpose of determining the significance of the project's impact on noise, would the project result in:

1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
2) Generation of excessive groundborne vibration or groundborne noise levels?
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

For the purposes of this analysis, the City of Daly City relies on the following CEQA thresholds of significance as related to noise:

- A significant noise impact would be identified if the project would generate a substantial temporary or permanent noise level increase over ambient noise levels at existing noise-sensitive receptors surrounding the project site and that would exceed applicable noise standards presented in the General Plan or Municipal Code at existing noise-sensitive receptors surrounding the project site.
    - A potentially significant impact would occur if the project generated noise levels would result in a substantial temporary or periodic increase in ambient noise levels above current levels.
    - A temporary construction noise impact would be considered significant if project construction activities produced noise levels exceeding 90 dBA L_{eq} at residential land uses or 100 dBA L_{eq} at commercial land uses surrounding the site.[67]
    - A significant permanent noise level increase would occur if project-generated traffic generated by the project or project improvements/operations would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA CNEL or greater, with a future noise level of less than the "normally acceptable" standard, or b) the noise level increase is three dBA CNEL or greater, with a future noise level equal to or greater than the "normally acceptable" standard.
    - A significant noise impact would be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan or Municipal Code.
- A significant impact would be identified if the construction of the project would generate excessive vibration levels surrounding receptors. Ground-borne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in cosmetic damage to normal buildings.

[67] Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*. 2018.

- A significant noise impact would be identified if the project would expose people residing or working in the project area to excessive aircraft noise levels.

3.13.2.1 *Project Impacts*

Impact NOI-1:	The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **(Less than Significant Impact with Mitigation Incorporated)**

Construction Noise

Construction of the proposed project would include demolition of existing structures, excavation and grading, and construction of new buildings. The majority of construction noise would be generated by the operation of equipment and heavy machinery, such as bull dozers, backhoes, and auger drills. This type of construction equipment could generate noise ranging from 70 to 90 dBA at a distance of 50 feet away. The project would be built out over several phases, with the Parcel B Development project being constructed first and taking approximately 24 months to complete. The remaining development on Parcels C-F are assumed to be built in two phases (Parcels C and D, followed by Parcels E and F).

Noise modeling for buildout of the Precise Plan (refer to Appendix K) assumed worst-case conditions, in that all equipment per phase of construction would be operating simultaneously. As discussed in Section 3.3 Air Quality, construction equipment assumed in the noise modeling was based on CalEEMod default equipment and schedule information for a project of this type and size per phase. For construction noise, the use of multiple pieces of equipment simultaneously would add together as a collective noise source. While every piece of equipment per phase would likely be scattered throughout the site, the noise-sensitive receptors surrounding the site would be subject to the collective noise source generated by all equipment operating at once. Therefore, to assess construction noise impacts at the receiving property lines of noise-sensitive receptors, the worst-case hourly average noise level for each phase was centered on the site and extrapolated to the nearest property line of the surrounding land uses.

The nearest noise sensitive receptors are residential buildings the north, west, and south, as well as a school to the south of the project site. Ambient noise levels in the project area range from 46 to 67 dBA L_{eq}. Since the proposed project would be built out over phases, construction noise and location would vary by phase. Table 3.13-3 through Table 3.13-5 summarizes the equipment expected to be used for each construction phase (Parcels B-F), duration of construction, and estimated noise levels from the center of each phase to the property lines of the surrounding land uses. As each Parcel is proposed for development, the assumptions used for purposes of this analysis would be revisited to confirm they are accurate in evaluating and disclosing the impacts of constructing that phase, and to the extent the specific construction details differ from what was evaluated in this EIR, additional analysis would be completed to fully evaluate the proposed development to identify any additional noise controls that would be necessary, if at all, for the construction activity to avoid impacting

nearby sensitive uses, including earlier phases of the Precise Plan that were at that point occupied and could be impacted by construction activity elsewhere under the Precise Plan.

Table 3.13-3: Parcel B Construction Phase Noise Levels						
Phase	**Time Duration**	**Construction Equipment (Quantity)**	**Calculated Hourly Average L_{eq} at Residence, dBA**			
			South Parcel C/D (215 ft)	**North Multi-Family Residential (220 ft)**	**West Parcel A (250 ft)**	**East Cemetery (505 ft)**
Demolition	7/3/2021-7/28/2023	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	80	79	78	72
Site Preparation	7/29/2023-8/11/2023	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	74	74	73	66
Grading/ Excavation	8/12-2023-9/8/2023	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	70	70	69	63
Trenching/ Foundation	9/9/2023-10/6/2023	Tractor/Loader/Backhoe (1) Excavator (1)	74	73	72	66
Building - Exterior	10/7/2023-8/23/2024	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	77	77	76	70
Building-Interior/ Architectural coating	8/24/2024-9/20/2024	Air Compressor (3)	58 to 77 [a]	58 to 77 [a]	56 to 76 [a]	50 to 70 [a]
Paving	9/21/2024-10/18/2024	Paver (2) Paving Equipment (2) Roller (2)	71 [b]	71 [b]	69 to 70 [b]	63 to 64 [b]

a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase.
b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.

Table 3.13-4: Parcel C/D Construction Phase Noise Levels						
Phase	**Time Duration**	**Construction Equipment (Quantity)**	**Calculated Hourly Average L_{eq} at Residence, dBA**			
			East Parcel E (195 ft)	**North Parcel B (280 ft)**	**South School (290 ft)**	**East Cemetery (500 ft)**
Demolition	25 Days	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	80	77	77	72
Site Preparation	13 Days	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	75	72	71	67
Grading/ Excavation	41 Days	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	80	77	77	72
Trenching/ Foundation	42 Days	Tractor/Loader/Backhoe (1) Excavator (1)	67	64	64	59
Building - Exterior	61 Days	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	78	75	75	70
Building-Interior/ Architectural coating	34 Days	Air Compressor (3)	59 to 78 [a]	55 to 75 [a]	55 to 75 [a]	50 to 70 [a]
Paving	42 Days	Paver (2) Paving Equipment (2) Roller (2)	72 [b]	68 to 69 [b]	68 [b]	63 to 64 [b]

a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase.
b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.

Table 3.13-5: Parcel E/F Construction Phase Noise Levels						
Phase	**Time Duration**	**Construction Equipment (Quantity)**	**Calculated Hourly Average L_{eq} at Residence, dBA**			
			North Parcel A (240 ft)	**South Multi-Family Residential (280 ft)**	**East Parcel C/D (250 ft)**	**West Single Family (465 ft)**
Demolition	25 Days	Concrete/Industrial Saw (1) Excavator (3) Rubber-Tired Dozer (2)	75	73	69	69
Site Preparation	13 Days	Rubber-Tired Dozer (3) Tractor/Loader/Backhoe (4)	73	72	68	67
Grading/ Excavation	41 Days	Excavator (1) Grader (1) Rubber Tired Dozer (1) Tractor/Loader/Backhoe (3)	71	70	66	65
Trenching/ Foundation	42 Days	Tractor/Loader/Backhoe (1) Excavator (1)	65	64	60	59
Building - Exterior	61 Days	Crane (1) Forklift (3) Generator set (1) Tractor/Loader/Backhoe (1) Welder (1)	76	75	71	71
Building-Interior/ Architectural coating	34 Days	Air Compressor (3)	57 to 76 [a]	55 to 75 [a]	51 to 71 [a]	51 to 71 [a]
Paving	42 Days	Paver (2) Paving Equipment (2) Roller (2)	70 [b]	68 to 69 [b]	64 to 65 [b]	64 [b]

a. The range of construction noise levels represents the levels during the Building-Interior/Architectural Coating phase only and combined with the Building-Exterior phase.
b. The range of construction noise levels represents the levels during the Paving phase only and combined with the Building-Interior/Architectural Coating and Building-Exterior phases.

As shown in Table 3.13-3 through Table 3.13-5 above, construction of the proposed project during each phase (none overlapping) could generate noise levels that exceed ambient noise levels by five dBA L_{eq} during construction; however, construction noise levels would not exceed 90 dBA L_{eq} at residential land uses or 100 dBA L_{eq} at commercial land uses surrounding the project site. The project would be required to implement Best Management Practices (BMPs). BMPs are required at the time of building permit issuance for all development and would reduce any impacts of additional noise level exposure to insignificance. Such BMPs include requirements for construction vehicles and equipment to be properly muffled. Construction hours would be limited to 8:00 AM to 5:00 PM, Mondays through Fridays. Construction on weekends and holidays will be prohibited to avoid inconveniencing neighbors. To ensure construction noise impacts do not exceed acceptable levels, the following mitigation measure would be implemented for each phase of development, i.e. each Parcel.

Mitigation Measure:

MM NOI-1.1: The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls:

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.

- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

With implementation of MM NIO-1.1 above, the proposed project would reduce construction noise to a less than significant level.

Operational Noise

Traffic Noise

The ambient noise environment near the school areas as measured by LT-2 resulted in a noise level of 63 dBA CNEL. The existing ambient noise environment measured at LT-1 and LT-3 near multi-family residential areas resulted in noise levels ranging from 65-66 dBA CNEL. A significant impact would occur if project-generated traffic increased levels by three dBA CNEL or more. For reference, a three dBA CNEL noise increase would be expected if the project would double existing traffic volumes along a roadway.

As discussed further in Section 3.15 Transportation, implementation of the proposed project would result in an increase in traffic along surrounding streets. Based on these traffic changes, the project is estimated to result in a maximum noise level increase of two dBA CNEL along all roadways in the project area; therefore, project traffic noise would be below the three dBA CNEL impact threshold. As a result, the traffic noise generated by the proposed project would have a less than significant impact.

Mechanical Equipment

The project would include various mechanical equipment such as air conditioners, exhaust fans, chillers, pumps, and air handling equipment located on the roofs of the proposed buildings.

Mechanical equipment on the roofs of future buildings on Parcels B, C, D, E, and F are estimated to produce noise levels of approximately 75 dBA at five feet. The nearest building façades to all parcels would be approximately 80 feet away. At this distance, unshielded noise levels would be approximately 51 dBA or 60 dBA CNEL. Existing ambient noise levels exceed 60 dBA CNEL;

therefore, noise from mechanical equipment associated with the proposed project would be below ambient conditions and have a less than significant noise impact.

Emergency Generators

Emergency generators are proposed to be located on Parcels B, D, E, and F. Generators would be located either in the basement or on the ground floor. For the purposes of this analysis, it was conservatively assumed the generators would be located on the ground floor and would be rated at approximately 750 Kilowatts (kW), would be powered by a 60 hertz (Hz) diesel engine, and would be fitted with a manufacturer's acoustical enclosure. Based on file data, sound pressure levels from the generator would be approximately 75 dBA at 5 feet assuming an acoustic enclosure.

Emergency generators are tested monthly for a period of one hour between 7:00 AM and 10:00 PM. Table 3.13-6 below summarizes noise levels at surrounding receptors during the testing period for generators located on Parcels B, D, E, and F.

Table 3.13-6: Noise Levels for Monthly Tests of the Emergency Generators

Receptor	Distance from Center of the Generator Room	L_{eq}, dBA	CNEL, dBA
Parcel B			
Parcel C/D, south	80 feet	51	47
Parcel A, west	100 feet	49	45
Multi-Family Residential, north	135 feet	46	42
Cemetery, east	400 feet	<40	<40
Parcel D			
Parcel B, north	80 feet	51	47
Parcel E, west	100 feet	49	45
Cemetery, east	230 feet	42	<40
Parcel E			
Parcel C/D, east	80 feet	51	47
Multi-Family, south	90 feet	50	46
Parcel F, west	100 feet	49	45
Parcel A, north	250 feet	41	<40
Parcel F			
Parcel A, north	60 feet	53	49
Parcel E, east	80 feet	51	47

Table 3.13-6: Noise Levels for Monthly Tests of the Emergency Generators			
Receptor	**Distance from Center of the Generator Room**	**L_{eq}, dBA**	**CNEL, dBA**
Multi-Family, south	100 feet	48	44
Single Family, west	170 feet	44	40

As shown in Table 3.13-6 above, emergency generator noise during testing would not exceed 53 dBA L_{eq} or 49 dBA CNEL at any adjacent receptor. This would be below the existing ambient noise levels at the surrounding receptors; therefore, emergency generator noise would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Impact NOI-2: The project would not result in generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact)**

Future development under the project may generate perceptible vibration in the immediate vicinity when heavy equipment or impact tools (e.g. jackhammers, hoe rams) are used. Construction activities would include site demolition work, preparation work, excavation of below-grade levels, foundation work, and new building framing and finishing. Construction activities, such as the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Vibration levels would vary depending on soil conditions (e.g., rocks vs. soft soil), construction methods (the project does not propose pile driving), the equipment used (e.g., vibratory roller vs. small bulldozers and graders), and distance.

The City does not define quantitative vibration thresholds; therefore, a conservative vibration limit of 0.3 in/sec PPV has been used, consistent with California Department of Transportation guidelines. Table 3.13-7 below summarizes the vibration levels at the nearest building facades around the project site.

Table 3.13-7: Vibration Source Levels for Construction Equipment						
Equipment		**PPV at 25 ft. (in/sec)**	**Vibration Levels at Nearest Surrounding Building Façades (in/sec PPV)**			
			South Residential (20 ft)	**East Commercial (60 ft)**	**Southeast Residential (75 ft)**	**West Residential (85 ft)**
Clam shovel drop		0.202	0.258	0.077	0.060	0.053
Hydromill (slurry wall)	In soil	0.008	0.010	0.003	0.002	0.002
	In rock	0.017	0.022	0.006	0.005	0.004
Vibratory Roller		0.21	0.268	0.080	0.063	0.055
Hoe Ram		0.089	0.114	0.034	0.027	0.023
Large bulldozer		0.089	0.114	0.034	0.027	0.023
Caisson drilling		0.089	0.114	0.034	0.027	0.023

Table 3.13-7: Vibration Source Levels for Construction Equipment					
Equipment	PPV at 25 ft. (in/sec)	Vibration Levels at Nearest Surrounding Building Façades (in/sec PPV)			
		South Residential (20 ft)	East Commercial (60 ft)	Southeast Residential (75 ft)	West Residential (85 ft)
Loaded trucks	0.076	0.097	0.029	0.023	0.020
Jackhammer	0.035	0.045	0.013	0.010	0.009
Small bulldozer	0.003	0.004	0.001	0.001	0.001

As shown in Table 3.13-7, vibration levels at nearby buildings would not exceed 0.3 in/sec PPV. Thus, construction vibration impacts would be less than significant. **(Less than Significant Impact)**

Impact NOI-3: The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

The SFO airport is located approximately five miles southeast of the project site. The project site is located outside the 65 dBA CNEL noise contour of SFO; however, the project site is located within the 60 dBA CNEL noise contour. The interpolated CNEL noise levels due to aircraft flyovers is estimated to be 63 DBA, which is consistent with the City's 65 dBA CNEL threshold for aircraft noise (General Plan Task HE-4.2). **(Less than Significant Impact)**

3.13.2.2 *Cumulative Impacts*

Impact NOI-C: The project would not result in a cumulatively considerable contribution to a cumulatively significant noise impact. **(Less than Significant Cumulative Impact)**

Construction

While cumulative projects could be constructed at the same time as the proposed project and result in a temporary construction noise increase, all projects in the City would be required to comply with the City's Municipal Code, as well as implement similar measures as those identified under Impact NOI-1. Nevertheless, if the proposed project's construction schedule were to overlap one or more of the cumulative projects' construction schedules for a consecutive 12 months or more and if the same sensitive receptors were impacted, the project would have a cumulatively considerable contribution to a cumulative construction noise impact.

This would not occur, however, as the nearest cumulative project for which construction timeframes could overlap is the Serramonte Condominiums and Hotel project located at 525-595 Serramonte Boulevard, 500 feet northeast of the project site. These projects would have a similar nearest sensitive receptor, located across Serramonte Boulevard north of the project site; however, construction of the Serramonte Condominiums and Hotel project is anticipated to last only 18 months

and start construction before the proposed project. Thus, construction schedules would not overlap one or more years and a significant noise and vibration impact would not occur. **(Less than Significant Cumulative Impact)**

3.13.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes because the City of Daly City has policies that address existing noise conditions affecting a proposed project.

Exterior Noise

The exterior noise threshold established in the City's General Plan for new residential uses is 70 dBA CNEL, for commercial uses it is 75 dBA CNEL, and for open space it is 75 dBA CNEL. Noise affecting the project site under future conditions will continue to be vehicular traffic on Serramonte Boulevard and Callan Boulevard, and aircraft noise from SFO. Based on the transportation impact assessment prepared for the project, noise along Serramonte Boulevard and Callan Boulevard from growth in future traffic volumes is expected to increase by approximately one to two dBA CNEL above existing conditions. Existing ambient noise levels at the project site are at most 67 dBA CNEL; therefore, future noise levels at the project site would be at or below the 70 dBA CNEL threshold for residential uses and below the 75 dBA CNEL threshold for commercial and open space uses.

Parcel B Development Project

The Parcel B Development project includes a podium plaza and a rooftop terrace as outdoor uses for the residential units. The podium plaza would be bounded on three sides by the proposed building, to the north, west, and south, which would ensure noise levels at the plaza would be below the 70 dBA CNEL threshold. The rooftop terrace is located at the southeast corner of the building and would face Callan Boulevard. Noise levels at this height and location are estimated to be below the 70 dBA CNEL threshold as well.

The Parcel B Development Project also includes a public park and trail system along the eastern portion of Parcel B, facing Callan Boulevard. As discussed above, future ambient noise levels at the project site (with the addition of project traffic) would be 70 dBA CNEL or less; therefore, the noise levels at the public park would be below the 75 dBA CNEL noise threshold.

A retail plaza would also be located along the western side of the proposed Parcel B Development project. This retail plaza would be facing Serramonte Boulevard; however, future ambient noise levels at the project site (with the addition of project traffic) would be 70 dBA CNEL or less; therefore, the noise levels at the retail plaza would be below the 75 dBA CNEL noise threshold.

Precise Plan

Future development under the proposed Precise Plan on Parcels C, D, E, and F would include additional housing, commercial space, public parks, and trails along the perimeter of the project site.

While specific development plans are currently unavailable, future noise levels at these locations are expected to be less than or equal to Parcel B because they are no closer to major noise sources than Parcel B. As discussed above, exterior noise levels at Parcel B would meet City thresholds for exterior noise levels for residential, commercial, and open space uses. Thus, future noise levels on Parcel C, D, E, and F would also meet City thresholds.

Interior Noise

The California Building Code establishes an interior noise threshold of 45 dBA CNEL for multi-family residential units. The California Green Building Standards Code (CALGreen) requires that interior noise levels be maintained at 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation within the proposed non-residential spaces within the proposed mixed-use buildings.

Parcel B Development Project

For the proposed residential portion of the Parcel B Development project, the residential building would be setback approximately 80 feet from the centerline of Serramonte Boulevard and have direct line-of-sight to the roadway. At this distance, units along the northern façade would be exposed to noise levels of 66 dBA CNEL. When aircraft noise is added, northern façade units would be exposed to noise levels of 68 dBA CNEL. The eastern façade of the proposed residential building would be setback approximately 330 feet from Callan Boulevard and have direct line-of-sight to the roadway. At this distance, units along the east façade would be exposed to noise levels of 63 dBA CNEL. When aircraft noise is added, eastern façade units would be exposed to noise levels of 66 dBA CNEL. The western and southern facades of the proposed residential building do not have direct line of sight to any surrounding roadways. The units along these facades would be exposed to future exterior roadway noise levels of up to 60 dBA CNEL. The combined roadway and aircraft noise level at the eastern façade of the proposed building would be 65 dBA CNEL.

Assuming standard construction with windows open, the future interior level for the rooms facing the roadways is expected to be 53 dBA CNEL at the northern façade, 51 dBA CNEL at the eastern façade, and 50 dBA CNEL at the southern and western façades. With windows closed, the future interior level would range from 43 to 48 dBA CNEL at the northern façade, 41 to 46 dBA CNEL at the eastern façade, and 40 to 45 dBA CNEL at the southern and western façades. The proposed residential units would thus require noise insulation features and forced-air mechanical ventilation systems to meet the state's interior noise threshold of 45 dBA CNEL to allow residents to maintain windows in the closed position. With implementation of the below condition of approval (specific to the Parcel B Development project), interior noise levels would meet the state's interior noise standard of 45 dBA CNEL.

Parcel B Development Project Condition of Approval:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, for all residential buildings, so that windows can be kept closed to control noise.
- Provide sound-rated windows and doors for the northern façade of the proposed building to maintain interior noise levels or below the City's 45 dBA CNEL interior noise threshold. Preliminary calculations show that sound-rated windows and doors with minimum STC

ratings of 30 would be satisfactory for units facing Serramonte Boulevard to meet the interior noise threshold. Standard residential grade windows and doors (minimum STC 26) would be required for all remaining units.

- A qualified acoustical specialist shall prepare a detailed analysis of interior residential noise levels resulting from all exterior sources during the final design phase of the project pursuant to requirements set forth in the General Plan and State Building Code. The study will review the final site plan, building elevations, and floor plans prior to construction and confirm building treatments necessary to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, sound-rated windows and doors as specified above, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a unit-by-unit basis during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

The ground floor of the proposed residential building would be used for commercial purposes. Standard construction materials for commercial uses would provide about 25 to 30 dBA of noise reduction in interior spaces assuming the inclusion of adequate forced-air mechanical ventilation systems. With a setback of about 80 feet from Serramonte Boulevard and 330 feet from Callan Boulevard, the future exterior roadway noise along the commercial use façades are expected to range from 64 to 67 dBA $L_{eq(1\text{-}hr)}$. The combined roadway and aircraft noise level at the eastern façade of the proposed building would range from 69 to 70 dBA $L_{eq\ (1\text{-}hr)}$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion would range from 37 to 45 dBA $L_{eq(1\text{-}hr)}$ during the peak daytime hour. This would meet the CALGreen threshold of 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation.

Precise Plan

Parcels C and D have direct lines of sight to Callan Boulevard, with a setback of approximately 150 feet from the centerline. At this distance, the Parcels C and D would be exposed to a future exterior roadway noise level of up to approximately 66 dBA CNEL. The combined roadway and aircraft noise level at the eastern façade of future buildings on Parcels C and D would be 68 dBA CNEL. Assuming standard construction with windows open, the future interior noise level for residential units facing the roadway is expected to be 53 dBA CNEL. With windows closed, the future interior level would range from 43 to 48 dBA CNEL. In order to allow residents to maintain windows in the closed position for noise control, the proposed residential units would thus require noise insulation features and forced-air mechanical ventilation systems to meet the City's interior noise thresholds. With implementation of the below condition of approval (specific to future development under the proposed Precise Plan), interior noise levels would meet the state's interior noise standard of 45 dBA CNEL.

Precise Plan Condition of Approval:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, for all residential buildings, so that windows can be kept closed to control noise.

- Provide sound-rated windows and doors for Parcels C and D to maintain interior noise levels or below the City's 45 dBA CNEL interior noise threshold. Preliminary calculations show that sound-rated windows and doors with minimum STC ratings of 30 would be satisfactory for units facing Callan Boulevard to meet the interior noise threshold. Standard residential grade windows and doors (minimum STC 26) would be required for all remaining units.
- A qualified acoustical specialist shall prepare a detailed analysis of interior residential noise levels resulting from all exterior sources during the final design phase of the project pursuant to requirements set forth in the General Plan and State Building Code. The study will review the final site plan, building elevations, and floor plans prior to construction and confirm building treatments necessary to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, sound-rated windows and doors as specified above, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted on a unit-by-unit basis during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

Parcels E and F do not have direct line of sight to any surrounding roadways; thus, future development on these parcels would be exposed to a combined roadway and aircraft noise level of 64 dBA CNEL. Assuming standard construction with windows open, the future interior levels for the residential units is expected to be 49 dBA CNEL. With windows closed, the future interior noise level would range from 39 to 44 dBA CNEL, which would meet the state's interior noise threshold of 45 dBA CNEL.

Parcels C, D, E, and F could also include commercial uses on the ground floor of future residential buildings. Commercial uses on Parcels C and D would be exposed to a combined roadway and aircraft noise level of 69 to 70 dBA $L_{eq\ (1\text{-}hr)}$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion of Parcels C and D would range from 37 to 45 dBA $L_{eq(1\text{-}hr)}$ during the peak daytime hour. Commercial uses on Parcels E and F would be exposed to a combined roadway and aircraft noise level of up to 65 dBA $L_{eq\ (1\text{-}hr)}$. Using standard construction materials with the inclusion of forced-air mechanical ventilation, interior noise levels at the commercial use portion of Parcels E and F would range from 35 to 40 dBA $L_{eq(1\text{-}hr)}$ during the peak daytime hour. Based on the above discussion, future commercial uses on Parcel C, D, E, and F would meet the CALGreen threshold of 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation.

3.14 POPULATION AND HOUSING

3.14.1 Environmental Setting

3.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[68] The City of Daly City Housing Element and related land use policies were last updated in 2015.

California Department of Housing and Community Development (HCD) conducted a Regional Housing Needs Determination for the Bay Area based on population projections and determined 441,176 new units must plan to be built in the region from 2023 to 2031. In 2021, ABAG in consultation with local jurisdictions and regional stakeholders, developed a methodology to assign the Bay Area's 2023 to 2031 RHNA. Following the allocation of housing units to each jurisdiction, an appeals process was conducted for cities and counties to change their allocation. In December, ABAG certified the RHNA Plan for the San Francisco Bay Area. According to RHNA Plan, Daly City is allocated a total of 4,838 total housing units. This includes 1,336 very low income units, 769 low income units, 762 moderate income units, and 1,971 above moderate income units.[69] The City is in the process of preparing an update to the Housing Element covering the timeframe from 2023-2031.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[70]

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[68] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed November 19, 2021. http://hcd.ca.gov/community-development/housing-element/index.shtml.

[69] Association of Bay Area Governments. *Final Regional Housing Needs Allocations (RHNA) Plan: San Francisco Bay Area, 2023-2031*. March 2022. Page 27.

[70] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

Daly City 2030 General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts on population and housing resulting from planned development within the City including the following:

Policy/Task	Description
Policy HE-1	Maintain and, where possible, create larger housing development sites throughout the City.
Policy HE-6	Assure that adequate development sites exist on the Potential Housing Sites Inventory List to ensure compliance with the City's Regional Housing Need Allocation
Policy LU-4	Provide regulatory incentives for developers to construct higher-density mixed-use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.

3.14.1.2 *Existing Conditions*

The population of Daly City was estimated to be 108,599 in January 2021, with an average of 3.33 persons per household.[71] Buildout of the City's General Plan is anticipated to result in 2,157 new housing units and 3,990 new jobs through 2030. ABAG estimates that in 2035, the City's population will grow to 115,015 people, while jobs will increase from approximately 18,370 (as of 2020) to 19,180 in 2035.[72]

The 1985 Precise Plan (described in greater detail in Section 2.2.1 Precise Plan) planned for the development of the project site with up to 175 residential units and approximately 700,000 square feet of office space in the project site area. The project site is identified as site number 15, "Serramonte Del Rey", in the City's current Housing Element, and consistent with the 1985 Precise Plan, was allocated 175 housing units, including 35 very low income, 18 low income, 70 moderate income, and 53 above moderate income units.

Parcel A has been developed with 122 multifamily units intended primarily for JUHSD employees. The rest of the Precise Plan area (Parcels B through F) contains no residential units.

[71] California Department of Finance. "E-5 City/County Population and Housing Estimates – January 1, 2021." Accessed November 19, 2021.http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.
[72] Association of Bay Area Governments and Metropolitan Transportation Commission. "Projections 2040." Accessed November 22, 2021. http://projections.planbayarea.org/.

3.14.2 Impact Discussion

For the purpose of determining the significance of the project's impact on population and housing, would the project:

1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

3.14.2.1 *Project Impacts*

Impact POP-1:	The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). **(Less than Significant Impact)**

A project can induce substantial population growth by: 1) proposing new housing beyond projected or planned development levels, 2) generating demand for housing as a result of new businesses, 3) extending roads or other infrastructure to previously undeveloped areas, or 4) removing obstacles to population growth (i.e., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

Direct Impacts

As noted in Section 3.14.1.2 Existing Conditions, the adopted 1985 Precise Plan allows the project site to be developed with up to 175 residential units and 700,000 square feet of office uses. Compared to what is allowed by the 1985 Precise Plan, the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail). This net change in development would result in approximately 3,403 additional residents.[73] Compared to the buildout of the General Plan, the project would represent an approximately three percent net increase in the City's population.[74]

While the project would result in an increase in population and housing compared to what is allowed in the adopted 1985 Precise Plan and General Plan, the project would be consistent with the City's goal of maximizing opportunities for higher-density housing (General Plan Policy HE-1 and Policy LU-4) and meeting the City's RHNA target (General Plan Policy HE-6). The project is also consistent with the intent of Plan Bay Area 2050 because it proposes additional residential units for

[73] 1,235 (number of housing units proposed) minus 175 (number of planned housing units) equals 1,060 housing units. Based on the City's average number of persons per housing unit (3.21), the 1,060 units would generate 3,403 additional residents. As the majority of employment uses would be eliminated, demand for housing from new businesses was assumed to be zero. Source: State of California, Department of Finance. E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022. May 2022. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/.

[74] Buildout of the City's General Plan would result in 106,388 residents.

the City to meets its RHNA targets. For these reasons, the project would not directly induce substantial population growth in the area, and the environmental effects of the new population growth from the project have been disclosed throughout this EIR. **(Less than Significant Impact)**

Indirect Impacts

As discussed in Section 3.17 Transportation, the project would require transportation infrastructure improvements to address intersection deficiencies and bicycle and pedestrian facilities. The transportation improvements would serve the proposed project, as well as existing and planned projects.

The project would also require connections to existing utility lines in the area. These standard connections to existing water, sewer, and storm drain systems to serve the project would not induce growth beyond the proposed project, as they are designed to serve the project population and not sized to serve additional growth, nor would they remove an existing constraint on development that would allow for unplanned growth. Based on the above discussion, the project would not indirectly induce substantial population growth through its infrastructure improvements. **(Less than Significant Impact)**

Impact POP-2:	The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

The project site is currently developed with the existing Serramonte Del Rey JUHSD campus, which includes the main campus building, a General Education Department building, two one-story portables, storage bungalows, and a Comcast relay station. None of these structures are inhabited or provide housing. The 122 multifamily housing units recently constructed on Parcel A will continue to exist regardless of the remainder of the proposed Precise Plan being approved. Therefore, the proposed project would not displace substantial numbers of existing people or housing necessitating the construction of replacement housing elsewhere. **(No Impact)**

3.14.2.2 *Cumulative Impacts*

Impact POP-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant population and housing impact. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative population and housing impacts is the City boundaries, and can be extended further to San Mateo County and the San Francisco Bay region. Past, present, and pending development projects contribute to the City's, County's, and region's population and housing impact.

As discussed under Impact POP-1, compared to the City's ABAG estimated population in 2035, the proposed project would result in an approximately three percent increase in residents citywide. This increase in growth citywide is not substantial, and it would not serve to create demand for additional housing within or outside the City. For these reasons, implementation of the project would not have a

cumulatively considerable contribution to a significant cumulative population and housing impact. **(Less than Significant Cumulative Impact)**

3.15 PUBLIC SERVICES

3.15.1 Environmental Setting

3.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Local

Daly City 2030 General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating impacts on public services resulting from planned development within the City including the following:

Policy/Task	Description
Policy RME-13	Require the dedication of parkland or the payment of an in-lieu fee in accordance with Subdivision Map Act.
Policy RME-14	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3)
Task SE-3.1	Support and maintain the City's Insurance Service Office (ISO) rating of a Class 2, which establishes the fire insurance rates for the City.

Task SE-3.2	Provide for a seven (7) minute total reflex time for arrival of a first due company to 90 percent of all emergency incidents.
Task SE-3.3	Provide for an eleven (11) minute total reflex time for arrival of multiple fire companies to 90 percent of all structure fires.
Task SE-3.4	Maintain fire company reliability, whereby 90 percent of all incidents are handled by the district fire company.

Daly City Municipal Code

Daly City Municipal Code Section 16.30.400 requires the dedication of park space of three acres per 1,000 people which can satisfied through either on-site park construction or land dedication. Public facility fees are described in Section 3.32.130 which are required upon issuance of a building permit to pay for municipally owned public facilities, including but not limited to city administrative facilities, fire facilities and equipment, libraries, police facilities and equipment, community recreation centers, street improvements and water and sewage facilities.

City of Daly City Capital Improvement Plan

In 2008, the City expanded its Capital Plan to cover a 20-year period. It was estimated that 2.8 million square feet of commercial space and 2,641 residential units would be added to the City, which is slightly more than projected with the 2013 General Plan. The study also projected the extent of capital improvements for public facilities which would be needed in the City over the same time period. The City identified the capital improvements which would be needed to provide City services to all areas over the next 20 years. The relationships between the additional projected commercial and residential development and the need for improvements in public facilities were analyzed. The City formulated impact fees that are based on the extent to which any need for new public facilities is attributed to new development.

City of Daly City Parks and Open Space Master Plan

The Parks and Open Space Master Plan is intended to guide decision making to help the City maintain, manage and develop the envisioned park and open space system and provide the community with the recreational opportunities. The Parks and Open Space Master Plan evaluates the existing park system and relies upon extensive community engagement to support the expansion, improvement, and protection of the park and open space system for the future.

3.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection services in Daly City are provided by a joint powers authority, the North County Fire Authority (NCFA). The NFCA consists of fire and emergency medical response services for the cities of Brisbane, Daly City, and Pacifica.[75] The NCFA responds to all fires, hazardous material spills, and medical emergencies within the constituent cities. Pursuant to Daly City General Plan Policy SE-3.3, fire protection service performance is measured by total reflex time. Total reflex time

[75] North County Fire Authority. "Frequently Asked Questions". Accessed November 16, 2021. https://northcountyfire.org/ncfa-overview/frequently-asked-questions/

refers to the total amount of time that passes from receipt of the emergency call to the arrival of the responding unit at the scene.

The nearest fire station to the project site is the City of Daly City Fire Station Number 94, located approximately 0.4 miles to the southeast at 444 Gellert Boulevard.

Police Protection Services

Police protection services are provided to the project site by the Daly City Police Department (DCPD). The DCPD is headquartered at 333 90th Street, approximately 1.5 mile north of the project site, and employs 111 sworn and 43 non-sworn personnel. Pursuant to Daly City General Plan Policy SE-3.2, police protection service performance is measured by total reflex time, as described above in Fire Protection Services.

Schools

The project site is located within the Jefferson Elementary Unified School District, and the Jefferson Union High School District. Students in the project area would attend Daniel Webster Elementary School and Fernando Rivera Middle School. Students would attend one of the four high schools, Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School, depending on the capacity of each facility. The closest high school to the project site is Westmoor High School, approximately 1.7 miles from the project site. The current enrollment capacities for these schools are shown in Table 3.15-1 below. As shown in Table 3.15-1, there is currently available capacity at the schools.

Table 3.15-1: School Enrollment and Capacity

School	Existing Capacity	Current Enrollment	Available Capacity
Daniel Webster Elementary School[1]	598	308	290
Fernando Rivera Middle School[1]	808	499	309
Westmoor High School[2]	2,096	1,250	846

[1] School data for the 2021-2022 school year. Source: Vidales, Bernardo. Superintendent, Jefferson Elementary School District. Personal Communication. July 7, 2022.

[2] SchoolWorks, Inc. *Jefferson Union High School District 2021/2022 Demographics and Enrollment Projections*. March 2022.

Parks and Recreational Facilities

The City currently has a number of public and private recreational open spaces. Public recreational open space consists of City parks and related facilities, and State and County parks. Private recreational open space consists of private golf and country clubs which limit access only to members.

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The City has 27 recreational facilities dispersed throughout the various City neighborhoods to serve residents.

The nearest parks to the project site are Gellert Park, located approximately 800 feet southeast of the project site, Edgewood Park and Fairmont Field located in Pacifica approximately 0.5 miles to the southwest of the project site, Mussel Rock Park approximately 0.5 miles to the west, and Cameo Tot Lot located approximately 0.6 miles to the south.

Libraries, Community Centers, and Other Public Services

In addition to the aforementioned public services, Daly City also has four public libraries: the Serramonte Main Branch, John Daly, Westlake, and Bayshore. The nearest library to the project site is the Serramonte Main Branch, located approximately 0.4 miles to the southeast.

There are two community centers, one art center, and one public clubhouse in Daly City. The nearest public facility is the Teglia Community Center, located approximately two miles northeast of the project site.

3.15.2 Impact Discussion

For the purpose of determining the significance of the project's impact on public services, would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

1) Fire protection?
2) Police protection?
3) Schools?
4) Parks?
5) Other public facilities?

3.15.2.1 *Project Impacts*

Impact PS-1:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. **(Less than Significant Impact)**

As discussed in Section 3.14 Population and Housing, buildout of the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail) compared to the adopted 1985 Precise Plan. The General Plan EIR (which includes

buildout of the 1985 Precise Plan) concluded that buildout of the General Plan would not require the expansion of fire facilities and stated that new fire facilities were not included in the City's Capital Improvement Plan.[76] While the proposed project would increase the number of residential units on the project site, with the corresponding reduction in employment uses, the proposed project is not anticipated to generate additional demand for fire services. In addition, as part of the permitting process, the NCFA would review the proposed project before permits are issued to ensure compliance with all applicable fire and building code standards and to ensure that adequate fire and life safety measures are incorporated into the project in compliance with all applicable state and city fire safety regulations. For these reasons, the project's potential impact on fire protection services would be less than significant. **(Less than Significant)**

Impact PS-2:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. **(Less than Significant Impact)**

As discussed above under Impact PS-1with regard to fire protection services, the proposed project is similarly not anticipated to generate additional demand for police protection services, as the intensity of uses between the adopted 1985 Precise Plan and proposed project would be similar. The General Plan EIR (which includes buildout of the 1985 Precise Plan) concluded that buildout of the General Plan would not require the expansion of police facilities and stated that new police facilities were not included in the City's Capital Improvement Plan.[77] Developing the site with a substantially larger resident population and substantially smaller employment population would not require the expansion or alteration of police facilities. For these reasons, the project's potential impact on police protection services would be less than significant. **(Less than Significant)**

Impact PS-3:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. **(Less than Significant Impact)**

Students generated from the project would likely attend Daniel Webster Elementary School and Fernando Rivera Middle School in the Jefferson Elementary School District, and Westmoor High School in the Jefferson Union High School District. Implementation of the project would result in a net increase of 1,235 residential units compared to existing conditions, including the recently constructed Parcel A units. According to the Developer Fee Justification Study for Jefferson Elementary School District published in 2014, the state-wide student generation factor which

[76] City of Daly City. *General Plan Update Draft Environmental Impact Report*. October 2021. Page 3.11-9.
[77] Ibid.

identifies the number of students per housing unit is 0.5 for grades K-8.[78] Therefore, using this rate, the proposed project would generate approximately 618 new students that would attend Daniel Webster Elementary School and Fernando Rivera Middle School. The Jefferson Union High School District has a student yield rate of 0.09 high school students per residential unit.[79] Therefore, the project would generate approximately 112 new high school students attending Terra Nova High School, Oceana High School, Westmoor High School, or Jefferson High School depending on the capacity at each facility. Pursuant to Section 65996 of the State Government Code, payment of school impact fees established by SB 50 is deemed to constitute full and complete mitigation for school impacts from development. Fulfillment of this requirement would mitigate the development of residential uses' impacts to schools to a less than significant level. **(Less than Significant Impact)**

Impact PS-4:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. **(Less than Significant Impact)**

City of Daly City Municipal Code Section 16.30.400 has a standard for parks of three acres per 1,000 residents. As discussed above in Section 3.14 Population and Housing, the proposed project would add approximately 3,403 new residents to the project site and would be required to provide 10.2-acres of new park space.[80] The Parcel B Development project includes a public park, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre. Additional park space is proposed as part of the buildout of the Precise Plan, but exact acreage is unknown at this time and will be determined as Parcels C-F are developed. The City of Daly City is served by several parks and recreational facilities, including 13 municipal parks and 12 tot lots, resulting in a total of 82.95 acres of developed public recreational open space which equals approximately 0.82 acres per 1,000 residents. However, according to the General Plan EIR, this parkland to population ratio does not take into account the numerous regional park facilities accessible to residents.

San Bruno Mountain State and County Park, a 2,063-acre park located in the Hillside Planning Area, includes multiple recreational facilities and trails. At the coastline, Thornton Beach State Park includes a panoramic overlook and parking lot adjacent to Highway 1, at the end of John Daly Boulevard. Lake Merced, which is adjacent to the city limits, north of the Westlake Planning Area, is a freshwater lake located in San Francisco but utilized by many Daly City residents due to its proximity. Lake Merced includes a circuit path all the way around as well as facilities such as picnic areas and barbeques. Additionally, the Fort Funston/Golden Gate National Recreation Area is also adjacent to the city limits, north of the Westlake Planning Area, and includes multiple trails. The abundance of regional open space around Daly City indicates that residents have access to more open

[78] Jefferson Elementary School District. *Developer Fee Justification Study for Jefferson Elementary School District*. February 2014. Accessed July 21, 2017.
[79] SchoolWorks, Inc. *Jefferson Union High School District 2021/2022 Demographics and Enrollment Projections*. March 2022.
[80] The City's General Plan park land dedication calculation is based on 3,403 residents/1,000 x 3 = 10.2 acres of parkland.

space than shown in the above ratio, although these facilities are trail-oriented, rather than active facilities (such as those that include playfields).

Based on the City's current parkland dedication ratio of three acres per 1,000 residents in the Municipal Code, the City will need to provide 15.8 acres of parkland to meet future need resulting from anticipated population growth (without ameliorating existing deficiencies). To meet this demand, the General Plan proposes a task to develop part of the 140-acre undeveloped Mussel Rock area into a park for community use. The program for the park will be further developed through the implementation the Parks and Recreation Analysis and Master Plan. The Parks and Recreation Analysis and Master Plan addresses existing and future opportunities for parks and recreational services for the city and guide the planning, selection, dedication and funding of future park land in the city. The Master Plan would allow priorities to be adopted and identify park site locations and development plans be determined at the time the acquisition and development process begins. The General Plan includes policies and programs to help parkland development to meet additional need which would reduce impact to a less than significant level.

In addition, the City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30.400 of the Municipal Code has a standard for parks of three acres per 1,000 people. In order to meet this requirement, the project would be required to allot 10.2-acres of land as parkland or pay an in-lieu fee equal to the value of the land (plus ten percent toward costs of off-site improvements) according to the Municipal Code parkland dedication standard. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Impact)**

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. **(Less than Significant Impact)**

Implementation of the proposed project would generate new residents in the City. These new residents would increase the demand for libraries, community centers, and other public facilities in comparison with existing conditions. The project would be subject to the Daly City Municipal Code Section 3.32.130, which requires new developments to pay fees that support the maintenance of city-owned facilities, including administrative facilities, community centers, and the public library system. If it is determined expansion of a library (or other public facility such as a community center) is required, the expansion would be subject to its own separate environmental review. It is expected that any future library or other public facilities would be constructed on previously disturbed sites within the existing urban area of the City. Based on previous analyses for library facilities on previously disturbed sites on the San Francisco Bay peninsula, the impacts associated with the construction of library facilities can be mitigated to a less than significant level with implementation of standard mitigation measures (such as the ones identified in Sections 3.3 Air Quality, 3.4 Biological Resources, 3.5 Cultural Resources, 3.10 Hydrology and Water Quality, 3.13 Noise and Vibration in this EIR). **(Less than Significant Impact)**.

3.15.2.2 *Cumulative Impacts*

Impact PS-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant public services impact. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative public services impacts is the City of Daly City.

Fire and Police Protection

As previously discussed under Impact PS-1, the General Plan EIR concluded that implementation of the General Plan would not necessitate the construction of new fire or police stations. The proposed project would not increase demand for fire or police services beyond what is anticipated in the General Plan EIR given the increased resident population on the site would be offset somewhat by a reduction in the substantial employment population that had been planned for the site under the current General Plan land use designation for the site. In addition, the proposed project would be constructed in accordance with current building codes and reviewed by NCFA to ensure appropriate safety features are incorporated to reduce fire hazards. For these reasons, the project would not result in significant cumulative impact to fire or police protection facilities and services.

Schools

Only one of cumulative projects from Table 3.0-1 (Serramonte Condominiums) is a residential project that would generate new students and it is located within the Brisbane Elementary School District; therefore, it would not have any impacts on the Jefferson Elementary School District.[81] Serramonte Condominiums is, however, within the boundary for Jefferson Union High School District.[82] The Serramonte Condominiums project proposes 323 residential units, which would generate approximately 29 new high school students. Westmoor High School currently as available capacity of 846 students (see Table 3.15-1) and can easily accommodate the proposed project's and the Serramonte Condominiums project's new high school students.

As required by state law (Government Code 65996), the cumulative projects (including the proposed project) shall pay the appropriate school impact fees to impacted school districts to offset the increase demands on school facilities caused by the development. The cumulative projects (including the proposed project), in conformance with state law (Government Code 65996), would not result in significant cumulative impacts to schools.

Parks

The geographic area for cumulative park impacts is the City boundaries. The implementation of the cumulative projects (including the project) would incrementally increase the demand for park facilities. The cumulative projects would be required to construct new park space, pay in-lieu fees,

[81] Jefferson Elementary School District. Boundary Book. Accessed November 18, 2021. https://www.jsd.k12.ca.us/District/Department/596-Enrollment-Information.
[82] San Mateo County Office of Education. Elementary School Districts, Union High School Districts, and Unified School Districts Map. Accessed November 18, 2021. https://www.smcoe.org/about/districts-and-schools/school-district-information/.

and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400, thereby reducing their impacts on parks to a less than significant level.

Libraries

As previously discussed under Impact PS-4, the project would be required to pay all associated Public Facility Fees associated with the issuance of a building permit. Impacts associated with an increased demand on libraries requiring construction of new facilities would be subject to separate environmental review. For these reasons, the cumulative projects would not result in a significant cumulative impact on libraries and public facilities. **(Less than Significant Cumulative Impact)**

3.16 RECREATION

3.16.1 Environmental Setting

3.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Local

Daly City General Plan 2030

The following policies in the City's General Plan have been adopted for the purpose of reducing or avoiding impacts related to recreation and are applicable to the project.

Policy/Task	Description
Task RME-12.1	Program for and undertake improvements to develop Mussel Rock Park as a passive recreational area for community use (see also Task CST-1.4). All improvements within the park shall be in substantial conformance with a Public Access Management Plan prepared for the site which shall include the following: 1. Public access paths provided in such a way as to ensure connectivity, maximize utility, and provide access along the entirety of the park site. 2. Public access amenities (such as benches, table and chairs, bicycle racks, trash and recycling receptacles, etc.), including benches in the public view overlook at appropriate locations. 3. Public access signs to facilitate, manage, and provide public access to the park, including the provision of directional signs. 4. At a minimum, two interpretive panels relevant to the site shall be provided at locations that maximize their utility.
Policy RME-13	Require the dedication of parkland or the payment of an in-lieu fee in accordance with Subdivision Map Act.
Policy RME-14	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3).

City of Daly City Parks and Open Space Master Plan

The Parks and Open Space Master Plan is intended to guide decision making to help the City maintain, manage and develop the envisioned park and open space system and provide the community with the recreational opportunities. The Parks and Open Space Master Plan evaluates the existing park system and relies upon extensive community engagement to support the expansion, improvement, and protection of the park and open space system for the future.

Daly City Municipal Code

The City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30.400 of the Municipal Code has a standard for parks of three acres per 1,000 people. This requirement may be satisfied through either on-site park construction, land dedication, or an in-lieu fee equal to the land value plus ten percent towards costs of off-site improvements.

3.16.1.2 *Existing Conditions*

The City currently has a number of public and private recreational open spaces. Public recreational open space consists of City parks and related facilities, and State and County parks. Private recreational open space consists of private golf and country clubs which limit access only to members.

Thirteen municipal parks and twelve tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The City has 27 recreational facilities dispersed throughout the various City neighborhoods to serve residents.

The nearest parks to the project site are Gellert Park, located approximately 800 feet southeast of the project site, Edgewood Park and Fairmont Field located in Pacifica approximately 0.5 miles to the southwest of the project site, Mussel Rock Park approximately 0.5 miles to the west, and Cameo Tot Lot located approximately 0.6 miles to the south. The demonstration garden located on the project site is not a recognized recreational facility by the City, as it is a private school garden used for classroom instruction. Thus, the removal of the garden as part of the project is not considered a CEQA impact requiring mitigation; however, as discussed in Section 2.2.1.1, JUHSD plans to provide a raised planter beds at their new district offices.

3.16.2 Impact Discussion

For the purpose of determining the significance of the project's impact on recreation:

1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

3.16.2.1 *Project Impacts*

Impact REC-1:	The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. **(Less than Significant Impact)**

The proposed project would add approximately 3,403 new residents (including the recently constructed Parcel A project) to the project site and would generate additional demand for parks in the project area. As discussed above in Section 3.15 Public Services under Impact PS-4, the project would be required to allot 10.2-acres of land as parkland or pay an in-lieu fee equal to the value of the land (plus ten percent toward costs of off-site improvements) according to the Daly City Municipal Code Section 16.30.400 parkland dedication standard.[83] The Parcel B Development project includes a privately owned, publicly accessible park, a recreational trail, and a public retail plaza, totaling approximately 0.8-acre, which would partially off-set demand on nearby recreational facilities. Approximately 6.5 acres of park space is proposed as part of the buildout of the Precise Plan, and the exact acreage will be determined as Parcel C-F are developed. Thus, the project proposes to pay in-lieu fees to offset recreational demand for parkland not provided by the proposed project. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Impact)**

Impact REC-2:	The project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

The proposed project would construct approximately 0.8-acre of privately-owned, publicly accessible park space as part of the Parcel B Development project. Approximately 6.5 acres of park space is proposed in the plan area the environmental impacts of which are discussed throughout this EIR and determined to be less than significant with mitigation incorporated. The exact amount of park space and design will be determined as Parcel C-F are developed. Construction of the proposed project's recreational facilities would have a less than significant impact on the environment. **(Less than Significant Impact)**

[83] The City's General Plan park land dedication calculation is based on 3,403 residents/1,000 x 3 = 10.2 acres of parkland.

3.16.2.2 *Cumulative Impacts*

Impact REC-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant recreation impact. **(Less than Significant Cumulative Impact)**

The geographic area for cumulative park impacts is the City boundaries. The implementation of the cumulative projects (including the project) would incrementally increase the demand for park facilities. The cumulative projects would be required to construct new park space, pay in-lieu fees, and/or dedicate land pursuant to Daly City Municipal Code Section 16.30.400, thereby reducing their impacts on parks to a less than significant level. The payment of in-lieu fees is an accepted method to offset a project's impacts to park facilities in that it allows the lead agency to collect the in-lieu fees from a number of projects to acquire or improve parkland in the area to serve new residents. **(Less than Significant Cumulative Impact)**

3.17 TRANSPORTATION

The following discussion is based, in part, on a Transportation Impact Assessment (TIA) prepared for the project by Fehr & Peers. A copy of this report, dated July 2022, is attached to this EIR as Appendix L.

3.17.1 Environmental Setting

3.17.1.1 *Regulatory Framework*

State and Regional

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. In December 2018, OPR released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill 743 (SB 743). The recommendations were incorporated into CEQA Guidelines Section 15064.3(b), which among other things describes factors that might indicate whether a development project's VMT may be significant.

Regional

San Mateo County Congestion Management Program

The City/County Association of Governments (C/CAG), as the Congestion Management Agency for San Mateo County, is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The purpose of the CMP is to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. Also included in the CMP is the Traffic Impact Analysis (TIA) Policy, which provides uniform

procedures to analyze traffic impacts. According to the CMP, an acceptable level of service at signalized intersections is LOS E.

San Mateo County Comprehensive Bicycle and Pedestrian Plan

To support and encourage walking and bicycling in San Mateo County, the SMCTA on September 8, 2011, adopted the San Mateo County Comprehensive Bicycle and Pedestrian Plan (CBPP). The CBPP outlines goals and policies designed to support the implementation of the long-term vision for bicycling and walking in the county.

Local

Daly City 2030 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from development projects within the City. The following policies are specific to transportation and are applicable to the proposed project.

Policy/Task	Description
Policy CE-6	Support regional efforts to improve traffic while accommodating future development.
Policy CE-7	Ensure an effective transit system by supporting the work of other agencies in their efforts to expand public transit in and around Daly City.
Policy CE-13	View transportation improvements (new and retrofit) as opportunities to improve safety, access, and mobility for all travelers and recognize bicycle, pedestrian, and transit modes as integral elements of the transportation system.
Policy CE-16	Strengthen pedestrian access between and within residential areas and schools, commercial areas, recreational facilities, transit centers, and major activity centers in the City.
Policy CE-20	Integrate Complete Streets infrastructure and design features into street design and private construction to create safe and inviting environments for people to walk, bicycle, and use public transportation.
Task CE-1.3	Require a traffic study as part of a complete application for discretionary projects which meet pre-determined criteria established by the City Engineer. The study shall determine the cumulative impact of the project on the City's principal intersections together with approved projects and projects under construction in Daly City and adjacent jurisdictions.
Task CE-1.6	Incorporate a Level of Service (LOS) standard into Daly City's Local Thresholds of Significance Guidelines and use the standard as an evaluation measure for the traffic impacts created by new discretionary projects and to identify future roadway and intersection improvements in the City's Capital Improvement Program. This standard shall be applied as follows: • Require that a minimum LOS D be maintained at all principal intersections.

Policy/Task	Description
	• Where a traffic study identifies that a discretionary project will degrade the Level of Service at any of the City's principal intersections to below acceptable levels, the City shall, through the environmental review process, require measures to mitigate the anticipated impact to a level of insignificance. • New vehicular traffic created by a discretionary project that causes any of the City's principal intersections to degrade to LOS F during any traffic period shall be considered a significant impact subject to the preparation of an Environmental Impact Report (EIR). The EIR shall provide both mitigation measures and feasible project alternatives that would effectively mitigate anticipated traffic impacts to a level of insignificance. • Mitigation measures shall include construction of or financial contribution toward traffic improvements that can effectively mitigate the impact within a ten-year timeframe from the project approval date. Traffic impacts which are not fully mitigable within a ten-year timeframe shall be considered temporarily unmitigable and subject to the adoption of a Statement of Overriding Considerations in addition to mitigation measures. • The City shall consider the potential for adoption of a Statement of Overriding considerations related to traffic in instances where there is substantial evidence that the project possesses qualities (including environmental, legal, technical, social, and economic factors) that merit the project's approval despite the traffic impacts caused by the project. The Local Thresholds of Significance Guidelines may provide additional detail and clarity.
Task CE-10.2	Amend the parking regulation to allow for a 30 percent parking reduction for all mixed-use development projects (as defined in the Zoning Ordinance) and clarify that the mixed-use parking reduction is allowed for buildings containing residential and retail components.
Task CE-13.3	Consider impacts to the existing and future bicycle and pedestrian network when completing environmental review for private development projects and require mitigation measures where necessary and reasonable to ensure that these systems are not impacted.
Task CE-16.9	Require as a condition of development/redevelopment project approval the provision of sidewalks and wheelchair ramps where lacking, repair or replacement of damaged sidewalks, and sidewalks that link directly to building entrances.
Task CE-20.1	In the design of any new roadway and as a part of any development review, ensure that adequate infrastructure is included that promotes a safe and convenient means of travel for all users. This shall include the provision of sidewalks, shared use paths, and, where practical, bicycle lanes.
Task CE-20.7	As a part of all new development, require, where appropriate, the provision of pedestrian-oriented signs, pedestrian-scale lighting, benches, and other street furniture so as to make non-motorized forms of travel comfortable and attractive alternatives to the automobile. Where necessary in new development, the city

Policy/Task	Description
	may require additional sidewalk and/or right-of-way width to accommodate these amenities.

Walk Bike Daly City

The City of Daly City replaced its 2013 Bicycle and Pedestrian Master Plan in 2020 with Walk Bike Daly City, a new master plan for bicycle and pedestrian facilities within the Daly City. Walk Bike Daly City aims to expand the City's network of pedestrian and bicycle facilities; close gaps in the existing system; enhance connections to key destinations; and, more generally, make walking and biking in Daly City safer, easier and more popular. Improvements identified by Walk Bike Daly City within the Precise Plan area include the construction of separated bikeways on Serramonte Boulevard from St. Francis Boulevard to Gellert Boulevard.

3.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by Highway 1, Interstate (I-) 280, and SR-35 (also known as Skyline Boulevard). Local access to the Precise Plan area is provided via Serramonte Boulevard, Campus Drive, Hickey Boulevard, Callan Boulevard, Gellert Boulevard, Junipero Serra Boulevard, St. Francis Boulevard, and Clarinada Avenue. These roadways are described below.

Highway 1 is a north-south freeway located north of the project site. In the project area, it provides three to five mixed-flow vehicle lanes in each direction of travel. It provides immediate access to the project site via on- and off-ramps at Clarinada Avenue and Serramonte Boulevard.

I-280 is a north-south freeway located east of the project site that extends from San Francisco to San Jose. In the project area, it provides four vehicle lanes in each direction of travel with ramps located at Serramonte Boulevard, the intersection of Serramonte Boulevard and Junipero Serra Boulevard, and at Hickey Boulevard.

Skyline Boulevard is a north-south highway that extends from west San Francisco to San Bruno. It provides most immediate access to the project site at Hickey Boulevard and via the Skyline Boulevard and Highway 1 interchange.

Serramonte Boulevard is a four-lane east-west arterial that extends from St. Francis Boulevard to the west to El Camino Real to the east. Sidewalks are provided on the south side of the street west of Callan Boulevard and on the north side of the street west of Gellert Boulevard. Dedicated bike lanes are provided on both sides east of Callan Boulevard, which become on-street parking lanes to the west. The posted speed limit is 25 miles per hour (mph) in the vicinity of the Project site and 30 mph east of Callan Boulevard.

Campus Drive is currently a discontinuous roadway which is cut off by the project site. South of the project site Campus Drive is a two-lane divided collector roadway extending from Hickey Boulevard to just north of the Summit Shasta School. A complete pedestrian sidewalk is currently provided on the west side of Campus Drive from the project site to Hickey Boulevard; the sidewalk on the east

side of this section of Campus Drive is discontinuous. On-street parking is prohibited. At the north border of the project site a short two-lane section of Campus Drive connects to Serramonte Boulevard opposite Kent Court. As part of the project, Campus Drive would be connected as a through roadway extending from Hickey Boulevard to Serramonte Boulevard.

Hickey Boulevard is a four-lane east-west collector that stretches from Monterey Road to the west to El Camino Real to the east. It crosses Skyline Boulevard and Interstate 280. Sidewalks on both sides and on-street parking on the north side are provided west of Gellert Boulevard. The posted speed limit in the study area is 35 mph.

Callan Boulevard is a north-south local street that alternates between one and two vehicle lanes in each direction of travel in the project vicinity. Sidewalks are provided on both sides and bike lanes are provided south of Hickey Boulevard. On-street parking is intermittent. The posted speed limit is 30 mph to the south of Hickey Boulevard and 35 mph to the north.

Gellert Boulevard is a six-lane north-south collector that extends from Serramonte Boulevard, terminating at Serramonte Center, south to Hickey Boulevard. It becomes a two- to four-lane road from Hickey Boulevard to Shannon Drive. Sidewalks are provided on both sides in the project area and bike lanes are provided south of Hickey Boulevard. The posted speed limit is 30 mph.

Junipero Serra Boulevard is a north-south arterial with two lanes in each direction of travel in the project area. Sidewalks are provided on both sides north of Serramonte Boulevard and on the east side between Serramonte Boulevard and Arlington Drive. Bike lanes on both sides are provided in the project area. The posted speed limit is 40 mph near the project site.

St. Francis Boulevard is a local two-lane road that extends from Eastmoor Avenue south to Hickey Boulevard, primarily serving residential land uses. Sidewalks and on-street parking are provided along the roadway. Bike lanes are provided north of Serramonte Boulevard. The posted speed limit is 25 mph.

Clarinada Avenue is an approximately 0.6-mile-long east-west local road connecting Higate Drive and Callan Boulevard. Two lanes of vehicle travel in each direction are provided east of the Highway 1 ramps and one travel lane in each direction to the west. On-street parking and sidewalks are provided along the entire road. The speed limit is not posted.

Transit Services

Existing transit service within the vicinity of the project site is provided by the San Mateo County Transit District (SamTrans) and Bay Area Rapid Transit (BART). Existing transit facilities in the area are shown on Figure 3.17-1.

SamTrans

Local transit service in the vicinity of the project site is provided by SamTrans, which operates 14 fixed bus routes in Daly City and a total of 82 routes in San Mateo County and the cities of San Francisco and Palo Alto. The project site is served by Routes 24, 49, 112, 120, and 121.

Route 24 runs service on school days from Brisbane to Colma to Summit Shasta High School in the morning, and the reverse route in the afternoon. The closest bus stop is located by the St. Francis Boulevard and Serramonte Boulevard intersection.

Route 49 runs service on school days from the Serramonte Center to Terra Nova High School in the morning, and the reverse route in the afternoon. The closest bus stop is by the Callan Boulevard and Serramonte Boulevard intersection.

Route 112 runs from the Linda Mar Park and Ride to the Colma BART station via Hickey Boulevard and Gellert Boulevard. It provides hourly service from 6:00 a.m. to 9:45 p.m. on weekdays, and from 7:55 a.m. to 8:45 p.m. on weekends. The closest bus stop is at the Callan Boulevard and Hickey Boulevard intersection.

Route 120 runs between the Daly City BART station to the north and Colma and South San Francisco BART stations to the South. It provides service from 4:05 a.m. to 11:45 p.m. with about 10-minute peak headways on weekdays and about 15-minute peak headways on weekends. The closest bus stop is at the Highway 1 and Serramonte Boulevard intersection.

Route 121 runs between Skyline College Transit Center to the intersection of Bellevue Avenue and Pope Street in Daly City via Hickey Boulevard and Gellert Boulevard, passing Serramonte Center and the Colma BART station. It provides hourly service from 6:25 a.m. to 10:40 p.m. on weekdays, from 7:25 a.m. to 10:40 p.m. on Saturdays, and from 7:25 a.m. to 9:00 p.m. on Sundays. The closest bus stop is by the Callan Boulevard and Serramonte Boulevard intersection.

SamTrans also provides paratransit service throughout San Mateo County. Daly City is served specifically by its Redi-Wheels on-demand service.

Bay Area Rapid Transit

Regional transit service is provided by BART. The closest BART station is the Colma BART station, located approximately 1.2 miles to the northeast of the project site. The South San Francisco BART station is located approximately 1.5 miles to the southeast of the project site. Both stations are served by the Red and Yellow lines. The Red Line runs from Richmond to Millbrae with service at 30-minute headways or less on weekdays and Saturdays. The Yellow Line runs from Antioch to the San Francisco International Airport (SFO) with at 30-minute headways or less every day of the week. As mentioned above, SamTrans routes 112, 120, and 121 connect to the Colma, Daly City, and SFO BART stations. SamTrans bus route 120 has stops in front of the Precise Plan area on Serramonte Boulevard and provides service to the Colma BART station with 10-minute headways during peak weekday and weekend hours.

Source: Fehr & Peers, 2023.

EXISTING TRANSPORTATION FACILITIES | FIGURE 3.17-1

Bicycle Facilities

Bicycle facilities within the vicinity of the project site include Class II bike lanes and Class III bike routes. These facilities are discussed below, and shown on Figure 3.17-1 above.

Class II Bike Lanes

Bike lanes provide designated street space for bicyclists, typically adjacent to the outer vehicle travel lanes. Bike lanes include special lane markings, pavement legends, and signage. Existing and proposed bicycle facilities are described below. Bike lanes may be enhanced with painted buffers between vehicle lanes and/or parking, and green paint at conflict zones (such as driveways or intersections). Class II bicycle lanes are currently provided along:

- Callan Boulevard south of Serramonte Boulevard
- Serramonte Boulevard between Callan Boulevard and the south entrance to Serramonte Center
- Junipero Serra Boulevard between Amelia M Teglia Boulevard and Hickey Boulevard

Class III Bike Routes

Class III bikeways are shared bikeways where the cyclist occupies the same right-of-way with either motor vehicles or pedestrians. Signs are used to designate that the street or path also is to be used by cyclists. While this type of bikeway is least expensive to install, it is the most hazardous. Class III bikeways are currently provided along:

- Serramonte Boulevard west of Callan Boulevard and in the vicinity of Gellert Boulevard
- Hickey Boulevard
- Callan Boulevard between Southgate Avenue and Serramonte Boulevard

Pedestrian Facilities

Pedestrian facilities in the vicinity of the Precise Plan area include sidewalks, crosswalks, and pedestrian signals. All local, collector, and arterial roads provide crosswalks on at least one side of the roadway. All signalized intersections either provide a marked crosswalk, or, in the case of three-legged intersections, a continuing sidewalk on the missing approach. Sidewalks are provided on both sides of all nearby roadways, with the exception of Serramonte Boulevard between Callan Boulevard and south entrance to Serramonte Center and portions east of Gellert Boulevard, Junipero Serra Boulevard south of Serramonte Boulevard, and the majority of Hickey Boulevard east of Gellert Boulevard, which provide sidewalks on one side of the roadway.

Vehicle Miles Traveled

VMT was modeled using the C/CAG-VTA travel demand model, which covers the entire nine-county MTC region and provides information regarding the characteristics of home-based vehicle trips made by residents throughout the Bay Area. More information on the assumptions and methodology behind the modeling of existing VMT is provided in Appendix L. The C/CAG-VTA

travel demand model indicates that the average Bay Area VMT per resident is 14.6, and the countywide VMT per resident is 13.6.

3.17.1.3 *Methodology*

At the time of this report, the City of Daly City is undertaking a process of updating its significance thresholds to be consistent with SB 743, and the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b). The City has not released draft significance thresholds to determine project VMT impacts. In the absence of an adopted City policy or draft numeric thresholds, this study utilized the OPR guidelines in analyzing VMT.

3.17.2 Impact Discussion

For the purpose of determining the significance of the project's impact on transportation, would the project:

1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4) Result in inadequate emergency access?

3.17.2.1 *Project Impacts*

Impact TRN-1:	The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

Circulation System

The City of Daly City does not currently have an adopted VMT policy. Per SB 743, the City's LOS standards cannot be used in CEQA analysis for transportation impacts, although any physical improvements to the roadway system to maintain acceptable LOS must be evaluated as physical changes to the environment related to the project. A summary of the project's consistency with City LOS standards is discussed in Section 3.17.3 Non-CEQA, below. The project's VMT impact is discussed in Impact TRN-2.

Vehicles would access the project site through a northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or through a southern access point accessible from Hickey Boulevard via Campus Drive. The project proposes the following improvements to the Serramonte Boulevard/Highway 1 intersection:

- Installation of traffic signal
- Installation of high-visibility crosswalks on all four legs

- Installation of ADA compliant curb ramps and associated sidewalk improvements in the intersection's four corners
- Installation of Class II bike-lanes on the north and south sides of Serramonte Boulevard at the Highway 1 Ramps/Entry Drive intersection consistent with the concepts presented in Walk-Bike Daly City
- Restriping the eastbound approach to include dedicated left and shared through-right turn lanes
- Restriping the westbound approach to include a 200-foot-long left turn pocket into the project site and a shared through-right turn lane
- Restriping the southbound (off-ramp) approach to include dedicated left and shared through-right turn lanes
- Provision of a shared bike-lane/bus stop in the intersection's southwest corner
- Provision of a shared cycle track bus stop in the intersection's northwest corner, consistent with the concepts presented in Walk-Bike Daly City
- Elimination of the westbound left turn lane on Serramonte Boulevard into the removed property driveway across from Kent Court

Implementation of the improvements identified above would be considered an improvement to existing conditions as it would increase vehicle, bicycle, and pedestrian safety. In addition, all the improvements identified above would be constructed within the existing right-of-way and no expansion of roadways would be necessary. Limited tree trimming or removal would be required for some of the improvements; however, any street trees removed would be replaced in accordance with the City's Urban Forestry Ordinance (see Impact BIO-5 in Section 3.4 Biological Resources). Thus, the construction of these improvements would not result in any significant environmental impacts.

As shown in Figure 2.2-5, the Precise Plan's internal public roadway network would consist of Entry Drive, which would extend south to North Drive, which would branch off into East and West Drive, each of which would extend south to Campus Drive. Entry Drive would be a four-lane roadway, while all other drives would be two lanes. An intersection operations analysis was conducted for the internal roadways that concluded that all intersections and driveways would operate at LOS A or B, indicative of acceptable traffic operations (refer to Appendix L).

Transit Services

Implementation of the proposed project (including the Parcel A development project) would introduce 3,403 net new residents to the project site in comparison with planned development levels (refer to the discussion in Section 3.14.2.1 under Impact POP-1) and would generate approximately 170 new transit users.[84] It is not anticipated that the increase in transit users would exceed the capacity of existing bus and BART services within the project area.

As discussed under Section 3.17.1.1 Regulatory Framework above, SamTrans routes 24 and 120 operate along Serramonte Boulevard with stops located on both sides of Serramonte Boulevard. The

[84] Assumes five percent of residents use public transit. Source: U.S. Census Bureau. *Commuting by Public Transportation in the United States: 2019.* April 2021.

Parcel A Development project was recently completed and installed bus stop amenities, including improved sidewalks and a new bus shelter on Serramonte Boulevard. The project proposes to complete sidewalk corner improvements and install crosswalks at all four legs of the Serramonte Boulevard/Entry Drive/Highway 1 intersection, which would improve access to existing transit facilities. Beyond these improvements, the project does not propose any modifications to existing transit circulation system (roadways, sidewalks, etc.) that could conflict with existing or planned transit services.

Based on the above, the proposed project would not conflict with a program, plan, ordinance or policy regarding transit services.

Bicycle and Pedestrian Facilities

Planned improvements to the existing bicycle and pedestrian circulation systems are identified in the City's General Plan and Walk Bike Daly City (refer to Section 3.17.1.1 Regulatory Framework). Various General Plan policies and actions have been adopted to implement planned improvements and ensure that future developments do not impact existing and future bicycle and pedestrian facilities.

As discussed in Section 3.17.1.2 Existing Conditions, Class II and Class III bicycle facilities are located adjacent to the project site and within the project vicinity. The bicycle facilities within the vicinity of the project site would remain unchanged post-implementation of the project, and the project would not result in increases to cyclists that would exceed the carrying capacity of existing facilities. Consistent with General Plan Policies CE-13 and CE-20, the project proposes to provide Class I, Class II, and Class III bicycle facilities on interior roadways within the project site and Class II bicycle facilities along eastbound and westbound Serramonte Boulevard that would improve bicycle access to and from the site. Additionally, the project would be consistent with the City's bicycle parking requirements. As discussed under Impact TRN-3 below, implementation of MM TRN-3.2 would ensure that the proposed right-in right-out driveway on Serramonte Boulevard would allow bicycles to cross safely.

The project proposes to improve pedestrian facilities at the Serramonte Boulevard/Highway 1 intersection by installing high visibility crosswalks on all four approaches along with ADA compliant ramps and associated sidewalk improvements at all four corners. Otherwise, implementation of the project would leave pedestrian facilities adjacent and within the project vicinity unchanged. Consistent with General Plan Policies CE-13, CE-16, CE-20 and Tasks CE-16.9, CE-20.1, and CE-20.7, implementation of the project would provide sidewalks on both sides of all internal roadways and high-visibility crosswalks at all internal stop-controlled intersections, as well as on the three legs of the proposed roundabout, which would improve pedestrian access to and from the site. Implementation of MM TRN-3.2 would ensure that the proposed right-in right-out driveway on Serramonte Boulevard would allow pedestrians to cross safely.

Based on the above, the proposed project would not conflict with a program, plan, ordinance or policy regarding bicycle and/or pedestrian facilities. **(Less than Significant Impact)**

Impact TRN-2:	The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact with Mitigation Incorporated)**

For purposes of this analysis, the City of Daly City is relying on the guidelines provided in OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (dated December 2018), and uses a threshold of 15 percent below the baseline regionwide (the nine-county San Francisco Bay Area) and countywide (San Mateo County) average home-based VMT per resident. As discussed in Section 3.17.1.2 Existing Conditions, the regionwide VMT per resident is 14.6, and the countywide VMT per resident is 13.6. As the significance threshold is 15 percent below these averages, the corresponding regionwide threshold is 12.4 VMT per resident, and the corresponding countywide threshold is 11.6 VMT per resident.

Consistent with OPR's Technical Advisory, since the retail component of the proposed project is expected to redistribute shopping trips rather than create new trips (i.e., people will drive to the closest retail store, thereby reducing VMT), the proposed retail uses are presumed to have a less than significant VMT impact.

The VMT generated by the residential component of the project was modeled using the same C/CAG-VMT travel demand model used to determine the VMT generated by the existing development. More information on the methodology used to determine the project's VMT impacts can be found in Appendix L of this EIR. The project's total VMT per resident (including the Parcel A development project), in comparison with the existing VMT per resident and the significant thresholds identified above, is shown below in Table 3.17-1.

Table 3.17-1: Precise Plan VMT per Resident

Level of Analysis	Existing VMT per resident	Significance Threshold[1]	Precise Plan VMT per resident	Significant Impact?[2]
Countywide	13.6	11.6	12.0	**Yes**
Regionwide	14.6	12.4	12.0	No

Notes:

[1] The significant threshold is 15 percent below the existing VMT per resident.

[2] Significant impacts shown in **bold**.

Source: Fehr & Peers, Inc. *Transportation Impact Assessment for the Serramonte Del Rey Precise Plan*. July 2022.

As shown above in Table 3.17-1, the residential component of the project is projected to generate 12 VMT per resident, which is below the regionwide significance threshold of 12.4 VMT per resident, but in excess of the countywide threshold of 11.6 VMT per resident.

Mitigation Measures:

MM TRN-2.1: Prior to issuance of building permits, the project applicant shall develop a transportation demand management (TDM) plan for the proposed project (except for the Parcel A development project which has already been occupied) in accordance with C/CAG's Transportation Demand Management Policy Implementation Guide, including any anticipated phasing, and shall submit the TDM Plan to the City for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the trip reduction, as required to reduce the VMT per resident from 12.0 to 11.6. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.

Trip reduction strategies applicable to the proposed project may include, but are not limited to, the following:

- Provide Secure and Accessible Bike Parking
- Provide Bicycle Maintenance Facilities
- Price and Unbundle Parking
- Provide Carpooling Programs
- Implement Car-Sharing Program
- Implement Loaner Bike Program
- Provide a Transit Riders Guide
- Provide a Dedicated Transportation Coordinator
- Provide an Online TDM Information Center
- Free Trial Rides on Transit Services
- Implement a Subsidized or Discounted Transit Program

The TDM plan shall indicate the estimated Vehicle Trip Reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the TDM plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving physical improvements, the project shall obtain the necessary permits/approvals from the City and install the improvements prior to building occupancy. Applicant will resubmit TDM Plan if there is a material adverse impact resulting from a change from the permitted uses (i.e., unit count, use type, phasing).

The TDM Plan shall require annual evaluation of the program by the property owner, to determine if the program goals in reducing automobile travel are satisfied and to assess the effectiveness of the various strategies implemented. The property owner shall be required to conduct biennial self-certification for the

first six years of project occupancy per the C/CAG TDM Program. The property owner shall conduct annual travel surveys and driveway counts to monitor the amount of automobile travel generated by the project. The goal of the TDM Plan and programs shall be to reduce the project's daily VMT per resident from 12.0 to 11.6. Based on the results of the surveys, the TDM programs shall be increased if these requirements are not met. Annual travel surveys and driveway counts (TDM program monitoring) shall be conducted for the first two years following project occupancy. The results of the monitoring program and travel surveys shall be submitted to the City for review and approval. If the program VMT reduction goals are met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied.

Based on current literature regarding project-level TDM strategies, implementation of MM TRN-2.1 would result in an approximately 20 percent reduction in the project's VMT per resident.[85] Thus the project's VMT per resident would be reduced from 12 to 10.8 VMT per resident, which is below the countywide significance threshold of 11.6 VMT per resident. Therefore, with implementation of MM TRN-2.1, the project would be consistent with CEQA Guidelines Section 15064.3(b). **(Less than Significant Impact with Mitigation Incorporated)**

Impact TRN-3:	The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact with Mitigation Incorporated)**

Construction Traffic

Buildout of the project would be phased and occur over the course of eight to 15 years. Construction staging and worker parking would occur on-site, and construction trucks would access the site via the northern and southern access points. The presence of construction truck and worker vehicle traffic on-site concurrent with operation of existing and adjacent uses could create potential safety conflicts with public transit, vehicles, bicycle, and pedestrian traffic.

Mitigation Measures:

MM TRN-3.1: A Construction Traffic Management Plan shall be developed and implemented to minimize impacts to the transportation system. The Construction Traffic Management Plan shall detail the Project's construction schedule, vehicle type time-of-day plans, route planning, advanced public notices of partial or full street

[85] Fehr & Peers. *Transportation Impact Assessment Serramonte Del Rey Precise Plan*. July 2022. Pages 37-38.

closures or traffic diversion, and other strategies to reduce potential conflicts during construction. The plan shall include, but not be limited to, the following:

- Identification of the traffic controls and methods proposed during each phase of Project construction. Provision of safe and adequate access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with Daly City standards and the requirements of the California Manual of Uniform Traffic Control Devices (CA MUTCD 2014, Revision 6).
- Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans.
- A prohibition on all construction truck activity during the weekday morning and evening peak commute periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.).
- Preservation of emergency vehicle access.
- Identification of approved truck routes in communication with Daly City staff.
- Location of staging areas and the location of construction worker parking.
- Identification of the means and locations of the separation (i.e. fencing) of construction areas and adjacent active uses.
- The provision of flaggers at all on-site locations where construction trucks and construction worker vehicles conflict with vehicle, bicycle, transit, or pedestrian traffic.
- Provision of a point of contact for residents to obtain construction information, have questions answered and convey complaints.

With implementation of MM TRN-3.1, safety conflicts between construction traffic and public transit, vehicles, bicycle, and pedestrian traffic would be reduced to a less than significant level.

Geometric Design

As discussed under Impact TRN-1, vehicles would access the project site through a northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or through a southern access point accessible from Hickey Boulevard via Campus Drive. The project would also include a right-in/right-out driveway onto Serramonte Boulevard approximately 200 feet east of Entry Drive; this driveway would provide access to the Parcel B garage. Since the driveway to the Parcel B garage as designed would be unsignalized, it could potentially conflict with vehicle, bicycle, and pedestrian traffic on Serramonte Boulevard.

Mitigation Measure:

MM TRN-3.2: As part of the Parcel B Development project's final design, details of the Serramonte Boulevard parking garage driveway design would include the following as determined necessary by the City Traffic Engineer:

- Measures to prohibit vehicular left-turns – either through the installation of a hard concrete median, vertical delineators, or alternative means.
- Adequate sight distance – obstructions to sight distance for all users should not be placed adjacent to the driveway and adequate throat distance to the garage entry should be provided accordingly.
- Pedestrian and bicycle warning measures – adequate warning measures for pedestrians and bicycles should be provided on Serramonte Boulevard, including the installation of tactile domes on the sidewalk and green hatched bike lane striping on the roadway.
- The Parcel B driveway along Serramonte Blvd. shall provide satisfactory separation distance from the intersection of Serramonte Blvd. and Highway 1 on- and off-ramps to address merging and any turning movements.
- A separate traffic study shall be conducted to determine if a new traffic signal at the Parcel B driveway is warranted. The results of the study will affect the City's determination on whether a driveway entry and exit shall be permitted along Serramonte Blvd.

Implementation of MM TRN-3.2 would ensure that vehicles exiting the driveway would have adequate sight distance and would not be able to make illegal left-turns which could create hazards for other vehicles, bicycles, and pedestrians. Additionally, MM TRN-3.2 would alert vehicles entering and exiting the driveway of the presence of bicycles and pedestrians. As such, implementation of MM TRN-3.2 would ensure that the proposed driveway does not substantially increase hazards.

The project also proposes to construct residential buildings that would each have their own gated parking garages, which residents would be able to access through the use of a keycard or equivalent technology. Queues at these parking garages could conflict with bicycle and pedestrian facilities if not designed properly.

Mitigation Measure:

MM TRN-3.3: As part of the project's final design, each residential facility's garage entrance accessed via the public right of way shall be designed to provide adequate storage for expected vehicle queues. The amount of storage shall be calculated based on the individual garage size and forecast rates of arrival and departure. A minimum stacking distance of 25 feet shall be provided between the back of curb and gate installation at the entrance to each residential garage entrance. The purpose of this space is to minimize the instance of vehicles queued across sidewalks and bicycle facilities. These queue calculations shall be performed for each garage and

submitted to the City Engineer with planning/building permit for review and approval.

Implementation of MM TRN-3.3 would ensure that entrances with adequate storage capacity are provided at each residential garage, which in turn would prevent vehicle queuing backing up into bicycle and pedestrian facilities. Accordingly, with implementation of MM TRN-3.3, the proposed residential garages would not increase hazards.

Incompatible Land Uses

Implementation of the project would redevelop the project site with residential and commercial uses. As shown on Figure 2.2-3, residential uses are present to the south, west, and north, and commercial uses are present to the northeast. Therefore, the Precise Plan does not propose any uses incompatible with the surrounding area that could result in increased hazards. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TRN-4:	The project would not result in inadequate emergency access. **(Less than Significant Impact with Mitigation Incorporated)**

Emergency vehicles would access the project site via the northern access point at the intersection of Serramonte Boulevard and the Highway 1 on-ramps, or via the southern access point accessible from Hickey Boulevard via Campus Drive. The northern access point would provide two travel lanes in each direction, while the southern access point would provide one travel lane in each direction. In order to ensure that emergency vehicles have adequate access to and within the project site, the project would be required to implement the following mitigation measures.

Mitigation Measure:

MM TRN-4.1: In accordance with City and North County Fire Authority requirements and design standards, all future development within the project site shall provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to accommodate emergency vehicles. As part of the final design and permitting process, each proposed development shall seek and obtain approval from the North County Fire Authority.

Implementation of MM TRN-4.1 would ensure that the streets used by emergency vehicles to access the Precise Plan area are in good condition and facilitate the safe and efficient movement of emergency vehicles. As part of the review process, the North County Fire Authority would confirm that adequate emergency vehicle access is provided to each parcel and individual building within the Precise Plan area. **(Less than Significant Impact with Mitigation Incorporated)**

3.17.2.2 *Cumulative Impacts*

Impact TRN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The current General Plan and 1985 Precise Plan allow up to 175 residential units and approximately 700,000 square feet of office space within the boundaries of the Precise Plan. The daily trip generation for this amount of development would be approximately 8,099 daily trips.[86] In comparison, the proposed project would generate approximately 8,433 net new trips, which results in a difference of 334 additional trips. Therefore, the project would result in a greater VMT than what is expected for the project site under the current General Plan. However, as discussed under Impact TRN-2 above, the project's VMT per resident would be reduced from 12 to 10.8 VMT per resident with implementation of MM TRN-2.1, which is below the countywide significance threshold of 11.6 VMT per resident. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative VMT impact.

The projects listed under Table 3.0-1 would be required to comply with state, regional, and local regulations addressing safe project design, emergency access, and roadway, transit, bicycle, and pedestrian facilities. Therefore, the projects would not combine to form a significant cumulative transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.17.3 Non-CEQA Effects

With the advent of SB 743 (refer to Section 3.17.1.1 Regulatory Framework), the effect of a project on automobile delay is no longer considered an impact on the environment. Nonetheless, local agencies retain their right to assess and regulate a project's impact on the circulation system outside of the CEQA process. In accordance with General Plan Policy CE-1.3 and the County's CMP, the TIA prepared by Fehr & Peers (refer to Appendix L) included an analysis of non-CEQA transportation issues, including intersection operations and parking.

Intersection Operations

Pursuant to the City of Daly City General Plan's Circulation Element, a project is considered to violate the City's LOS policy when the addition of project traffic degrades an existing intersection's operation from acceptable LOS (D or better) to unacceptable LOS (E or F), or adds substantial traffic to intersections already operating at LOS E or F. In the event a project causes an LOS deficiency, the City has discretion whether to require a project to address the deficiency by implementing roadway or other transportation improvements to restore or improve the level of service, and the relevant question under CEQA now that LOS degradation is not considered an environmental impact is whether those improvements would result in adverse physical changes to the environment, not whether LOS has degraded below the condition considered acceptable.

[86] Multifamily Housing Units (Land Use Code 220): 175 dwelling units x 7.32 = 1,281 daily trips. General Office (Land Use Code 710): 700,000 square feet/1,000 x 9.74 = 6,818 daily trips. Total daily trips = 8,099. Source: Institute of Transportation Engineers. *Trip Generation Manual (10th Edition)*. 2017.

In accordance with standard City practice and methodology, the project's effect on LOS was analyzed at the following 15 intersections during the weekday morning (7:00 a.m. to 9:00 a.m.) and evening (4:00 p.m. to 6:00 p.m.) peak periods:

- Highway 1 Ramps/Clarinada Avenue
- Callan Boulevard/Clarinada Avenue
- St. Francis Boulevard/Serramonte Boulevard
- Highway 1 Ramps-Project Driveway/Serramonte Boulevard
- Callan Boulevard/Serramonte Boulevard (Signalized)
- Gellert Boulevard/Serramonte Boulevard (Signalized)
- I-280 Southbound Ramps/Serramonte Boulevard (Signalized)
- I-280 Northbound Ramps/Serramonte Boulevard (Signalized)
- Junipero Serra Boulevard/Serramonte Boulevard (Signalized)
- Skyline Boulevard/Hickey Boulevard (Signalized)
- Hickey Boulevard/Campus Drive (Signalized)
- Callan Boulevard/Hickey Boulevard (Signalized)
- Gellert Boulevard/Hickey Boulevard (Signalized)
- I-280 Southbound Ramps/Hickey Boulevard (Signalized)
- I-280 Northbound Ramps/Hickey Boulevard (Signalized)

Trip Generation

The number of vehicle trips that would be generated by the project were estimated using trip generation rates from the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition.* Project trip generation estimates are presented in Table 3.17-2 below.

Table 3.17-2: Summary of Project Trip Generation

Land Use	Daily Trips	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Multifamily Housing (1,113 dwelling units)[1]	8,147	118	394	512	393	231	624
Retail (14,000 square feet)[2]	529	8	5	13	26	28	54
Mixed-Use Reduction (15 percent)[3]	-79	-1	-1	-2	-4	-4	-8
Subtotal Project Trips	**8,597**	**125**	**398**	**523**	**415**	**255**	**670**
Existing Trips[4]	-1,053	-115	-78	-193	-71	-108	-179
Parcel A Development Project (122 dwelling units)	889	12	80	92	53	13	69

Table 3.17-2: Summary of Project Trip Generation							
Land Use	**Daily Trips**	**AM Peak Hour**			**PM Peak Hour**		
		In	**Out**	**Total**	**In**	**Out**	**Total**
Total Net New Trips	**8,433**	**22**	**400**	**422**	**399**	**160**	**559**

Notes:

[1] Multifamily Housing (ITE Land Use Code 220) Daily Rate: 7.32; AM rate: 0.46 (23% in/77% out); PM rate: 0.56 (63% in/37% out)

[2] Shopping Center (ITE Land Use Code 820) Daily Rate: 37.75; AM rate: 0.94 (62% in/38% out); PM rate: 3.81 (48% in/52% out)

[3] Internal Trip Capture – 15% of Retail Trips Associated with Residential Users (ITE Trip Generation Handbook, 3rd Edition)

[4] Based on existing driveway counts and trip generation estimates of existing uses to be removed.

Source: Fehr & Peers. *Transportation Impact Assessment for the Serramonte Del Rey Precise Plan*. July 2022.

Extensive detail about the Non-CEQA LOS analysis, including methodology, trip distribution, trip assignment, and City standards is included in Appendix L.

Existing and Existing Plus Project Conditions

Under existing plus project (full Precise Plan buildout) conditions, three intersections would violate the City's LOS policy (see Table 3.17-3 below). All other intersections would operate at acceptable levels (see Appendix L for additional intersection calculations).

Table 3.17-3: Existing Plus Project Intersection LOS at Adversely Affected Intersections					
Intersection	**Peak Hour[1]**	**Existing**		**Existing Plus Project**	
		Delay[2]	**LOS**	**Delay[2]**	**LOS**
Highway 1/Clarinada Avenue*	AM	13.2	B	14.2	B
	PM	**41.4**	**E**	**45.9**	**E**
Highway 1/Serramonte Boulevard*	AM	24.6	C	**45.3**	**E**
	PM	19.2	**C**	**58.8**	**F**
Callan Boulevard/Hickey Boulevard	AM	24.9	C	25.1	C
	PM	54.5	D	**63.4**	**E**

Notes:

[1] AM = Weekday morning peak hour (7:00-9:00 a.m.); PM = Weekday afternoon peak hour (4:00-6:00 p.m.)

[2] Whole intersection average delay reported for signalized and all-way stop controlled intersections. Delay calculated per HCM 6th methodologies.

Bolded text indicates unacceptable operations pursuant to City standards. Bolded and underlined text indicates Project-related policy violation.

* Indicates an unsignalized intersection.

Source: Fehr & Peers. *Transportation Impact Assessment for the Serramonte Del Rey Precise Plan*. July 2022.

The following improvements would reduce project-related violations of the City's LOS policy under existing plus project conditions and could be accommodated within the existing right-of-way. In addition, the following improvements would be required to implement all construction-related standard permit conditions, conditions of approval, and mitigation measures identified in this EIR. Thus, construction of the improvements would have a less than significant impact on the environment.

Highway 1/Clarinda Avenue Improvement: Installation of a traffic signal is currently warranted at this intersection prior to the addition of any project traffic (including Parcel A traffic). The addition of project traffic would increase delay at this location while functioning at LOS E. The installation of a traffic signal at this location would result in acceptable operations (LOS A during both the morning and evening peak hours).

Highway 1/Serramonte Boulevard Improvement: Installation of a traffic signal is currently warranted at this intersection prior to the addition of any project traffic (including Parcel A traffic). While current volumes meet signal warrants, the intersection functions at an acceptable level of service prior to the addition of project traffic (LOS C in the AM and PM peak hours). The addition of project traffic would increase delay at this location and result in the level of service deteriorating to LOS E and F during the morning and evening peak hours, respectively. The installation of a traffic signal at this location would result in acceptable operations (LOS B during both the morning and evening peak hours).

Callan Boulevard/Hickey Boulevard Improvement: Stripe an exclusive westbound right-turn lane on the Hickey Boulevard approach to Callan Boulevard. This modification would be accomplished within the existing roadway cross section through the elimination of on-street parking for approximately 200 feet approaching the intersection. This modification would result in acceptable intersection operations within the City's LOS policy during the affected PM peak hour.

Cumulative and Cumulative Plus Project Conditions

Under cumulative plus project conditions, seven intersections would violate the City's LOS policy (see Table 3.17-4 below). All other intersections would operate at acceptable levels (see Appendix L for additional intersection calculations).

Table 3.17-4: Cumulative Plus Project Intersection LOS at Adversely Affected Intersections

Intersection	Peak Hour[1]	Cumulative		Cumulative Plus Project	
		Delay[2]	LOS	Delay[2]	LOS
Highway 1/Clarinada Avenue*	AM	18.0	C	21.8	C
	PM	**60.3**	**F**	**72.1**	**F**
Callan Boulevard/ Clarinada Avenue*	AM	21.7	C	24.3	C
	PM	**69.6**	**F**	**86.7**	**F**
Highway 1/Serramonte Boulevard*	AM	**49.6**	**E**	**115.0**	**F**
	PM	**56.1**	**F**	**129.6**	**F**

Table 3.17-4: Cumulative Plus Project Intersection LOS at Adversely Affected Intersections					
Intersection	**Peak Hour[1]**	**Cumulative**		**Cumulative Plus Project**	
		Delay[2]	**LOS**	**Delay[2]**	**LOS**
Gellert Boulevard/ Serramonte Boulevard	AM	17.0	B	17.8	B
	PM	53.1	D	**69.2**	**E**
Junipero Serra Boulevard/ Serramonte Boulevard	AM	35.4	D	36.9	D
	PM	**87.5**	**F**	**88.1**	**F**
Skyline Boulevard/ Hickey Boulevard	AM	32.8	C	45.5	D
	PM	**77.9**	**E**	**85.5**	**F**
Callan Boulevard/Hickey Boulevard	AM	38.5	D	38.5	D
	PM	**112.9**	**F**	**129.5**	**F**

Notes:

[1] AM = Weekday morning peak hour (7:00-9:00 a.m.); PM = Weekday afternoon peak hour (4:00-6:00 p.m.)

[2] Whole intersection average delay reported for signalized and all-way stop controlled intersections. Delay calculated per HCM 6th methodologies.

Bolded text indicates unacceptable operations pursuant to City standards. Bolded and underlined text indicates Project-related policy violation.

* Indicates an unsignalized intersection.

Source: Fehr & Peers. *Transportation Impact Assessment for the Serramonte Del Rey Precise Plan*. July 2022.

The following improvements would reduce project-related violations of the City's LOS policy under cumulative plus project conditions and could be accommodated within the existing right-of-way. In addition, the following improvements would be required to implement all construction-related standard permit conditions, conditions of approval, and mitigation measures identified in this EIR. Thus, construction of the improvements would have a less than significant impact on the environment.

Highway 1/Clarinada Avenue Improvement: Installation of a traffic signal. This improvement was identified as a remedy for existing plus Project conditions; it would also eliminate the Cumulative plus Project violation of the City's LOS policies. The addition of project traffic to cumulative conditions would increase delay at this location while functioning at LOS F. The installation of a traffic signal at this location would result in acceptable operations (LOS B or better during both the morning and evening peak hours).

Highway 1/Serramonte Boulevard Improvement: Installation of a traffic signal. This improvement was identified as a remedy for Existing plus Project conditions; it would also eliminate the Cumulative plus Project violation of the City's LOS policies. The addition of project traffic to cumulative conditions would increase delay at this location while functioning at LOS F in the PM peak hour and a degradation from LOS D to E in the AM peak hour. The installation of a traffic signal at this location would result in acceptable operations (LOS B under Existing plus Project conditions and LOS C under Cumulative plus Project conditions during both the morning and evening peak hours).

Callan Boulevard/Clarinada Avenue Improvement: Installation of a traffic signal would be warranted at this intersection under cumulative conditions prior to the addition of project traffic. The addition of project traffic to the cumulative scenario would increase delay at this location while functioning at LOS F during the PM peak hour. The installation of a traffic signal at this location would result in acceptable operations (LOS B during both the morning and evening peak hours) under Cumulative plus Project conditions.

Gellert Boulevard/Serramonte Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 120 seconds and optimizing splits to provide more time to the EB and WB approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Junipero Serra Boulevard/Serramonte Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 130 seconds and optimizing splits to provide more time to all approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Skyline Boulevard/Hickey Boulevard Improvement: Optimize the intersection's traffic signal timing by increasing the cycle length to 130 seconds and optimizing splits to provide more time to all approaches. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Callan Boulevard/Hickey Boulevard Improvement: Stripe an exclusive westbound right turn lane on the Hickey Boulevard approach to Callan Boulevard. This modification would be accomplished within the existing roadway cross section through the elimination of on-street parking for approximately 200 feet approaching the intersection. This improvement was identified as a remedy for Existing plus Project conditions. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified. Optimize the intersection's traffic signal timing by shortening the cycle length to 120 seconds and optimizing splits. This modification would improve the intersection's operation to better than pre-project levels in the cumulative condition during the PM peak hour where the policy violation was identified.

Parking

Pursuant to Daly City Municipal Code Section 17.34.020, the City requires one parking space per studio/junior one-bedroom unit, 1.5 spaces per one-bedroom unit, two spaces for every unit with two bedrooms or more, and one parking space per 300 square feet of retail space, which equates to a City code requirement of 2,052 residential spaces and 47 retail spaces.[87] The proposed project would construct a total of 1,853 residential spaces and 70 retail spaces, which would be 199 parking spaces below the minimum number of Code required residential parking spaces.

[87] Buildout of the project is assumed to have a unit mix of 188 studio/junior one-bedroom units, 461 one-bedroom units, 586 two-bedroom units, and 14,000 square feet of retail space.

The project's residential parking requirements were also calculated using The Institute of Transportation Engineer's (ITE) Parking Generation Manual, 5th Edition. ITE uses a rate of 1.23 and 1.37 parking spaces per low- to mid-rise apartments and high-rise apartments, respectively.[88] Based on these generation rates, the project would generate a residential parking demand of 1,519 to 1,692 spaces. As discussed above, the proposed project would provide 1,853 residential parking spaces, which would exceed the ITE generation rates.

[88] Institute of Transportation Engineer's. *Parking Generation Manual, 5th Edition*. 2018.

3.18 TRIBAL CULTURAL RESOURCES

The following discussion is based, in part, on a Cultural Resources Study prepared for the project by Tom Origer & Associates, dated February 26, 2021. A copy of this report is on file at the City of Daly City Planning Division.

3.18.1 Environmental Setting

3.18.1.1 *Regulatory Framework*

State

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

3.18.1.2 *Existing Conditions*

As discussed in Section 3.5 Cultural Resources, based on a site-specific records search and literature review, there are no known archaeological sites on the project site or nearby. The NAHC was contacted on December 29, 2020 to conduct a Sacred Lands File search. On January 19, 2021, the NAHC responded and determined there were no known sacred lands on the project site or within the project area. The NAHC provided a list of five Native American organizations to reach out to for additional information. These organizations were contacted on December 29, 2020 and February 25, 2021. No responses were received from any of the organizations.

On June 30, 2021, the City sent out notifications to the Amah Mutsun Tribal Band of Mission San Juan Bautista, Costanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band of Costanoan, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, and Ohlone Indian Tribe per SB 18 and AB 52. No responses were received from any of the tribes within 90 days of notice; therefore, tribal consultation was determined to be concluded as of September 28, 2021.

3.18.2 Impact Discussion

For the purpose of determining the significance of the project's impact on tribal cultural resources, would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.18.2.1 *Project Impacts*

Impact TCR-1:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact with Mitigation Incorporated)**

As documented under Section 3.18.1.2 Existing Conditions, there are no known TCRs within the Precise Plan area. As discussed in Section 3.5 Cultural Resources, the project site has a moderate potential to encounter subsurface tribal cultural resources. Construction-related ground disturbing activities could result in a significant impact to such resources if encountered. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1, MM CUL-2.2, and MM CUL-3.1 would be implemented. Implementation of these mitigation measures would ensure that any subsurface tribal cultural resources encountered during construction are appropriately treated and protected. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TCR-2:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. **(Less than Significant Impact with Mitigation Incorporated)**

See response to Impact TCR-1 above. **(Less than Significant Impact with Mitigation Incorporated)**

3.18.2.2 *Cumulative Impacts*

Impact TCR-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

As discussed under Impact TCR-1, there are no known TCRs on the project site. In the event an unknown TCR is discovered, the mitigation measures identified in Section 3.5 Cultural Resources would reduce impacts to a less than significant level. The projects listed under Table 3.0-1 would be required to comply with state, regional, and local regulations addressing TCRs. Therefore, the projects would not combine to form a significant cumulative tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.19 UTILITIES AND SERVICE SYSTEMS

The following discussion is based, in part, on a Water Supply Assessment (WSA) and hydraulic analysis prepared by Brown and Caldwell, dated December 2021 and September 2021, and a sanitary sewer capacity evaluation memo prepared by Woodard & Curran, dated October 2021. Copies of these reports are attached to this EIR as Appendix M, Appendix N, and Appendix O respectively.

3.19.1 Environmental Setting

3.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of Daly City adopted its most recent UWMP in June 2021.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a WSA containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Local

City of Daly City General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to utilities and service systems and are applicable to the proposed project.

Policy/Task	Description
Policy RME-1	Reduce average per capita demand by implementing cost effective water conservation programs that address all applicable methods of water conservation.
Task RME-1.1	Enforce the provisions of the Indoor Water Use Efficiency Ordinance through an extensive public outreach campaign to residents and contractors, to be completed by 2014.
Policy RME-2	Require drought resistant landscaping and water conserving irrigation methods in new development, and encourage the replacement of existing water-intensive landscaping.
Task RME-2.1	Enforce the provisions of the Water Conservation in Landscaping Ordinance and conduct a public education effort to ensure that residents, businesses, and contractors are aware of the Ordinance provisions.
Policy RME-3	Continue to use recycled wastewater for irrigating and explore opportunities to expand capacity to accommodate its use in development projects, landscaped medians, golf courses, cemeteries, parks, and school playgrounds.
Policy RME-4	For development projects which will create water demand exceeding a pre-defined amount, require that developers provide a water supply analysis for the project to demonstrate water availability to adequately serve the proposed project.
Task RME-4.1	Develop a water supply questionnaire for inclusion with any application involving 50 or more residential units, 50,000 square feet or commercial or industrial development, or other pre-defined development intensity that constitutes a significance threshold under CEQA.
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with applicable municipal stormwater Municipal Regional Stormwater NPDES Permit by incorporating controls that reduce water quality impacts over the life of the project in way that is both technically and economically feasible, and reduces pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.2	Evaluate acceptable development standards for stormwater treatment mechanisms and publish such standards for distribution to developers. Such standards shall be based on a thorough evaluation of modern stormwater control mechanisms and shall, to the extent feasible, consider soil conditions in various parts of Daly City.
Task RME-8.4	Assess projected stormwater impacts from new development in conformance with the San Mateo County Water Pollution Prevention Program, CEQA Guidelines and relative to state and federal standards.
Policy RME-9	Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit, i.e., reduction of Vehicle Miles Traveled (VMT) on local and regional roadways, to the extent permitted under the Municipal Regional Stormwater Permit.
Policy IN-3.7	Design new projects to minimize potential damage due to stormwaters and flooding to the site and other properties.

Daly City 2020 Urban Water Management Plan

The Urban Water Management Plan (UWMP) is a long-range plan that assesses the city's water supply over a 25-year planning horizon (2045) to ensure adequate water supplies to meet existing and future demands for water. The UWMP presents forecasted supplies and demands, describes conservation programs, and includes a water shortage contingency analysis.

Daly City Municipal Code

Chapter 17.41, Water Conservation, establishes regulations to implement water conservation practices on existing and new landscapes. For projects containing more than 1,000 square feet of irrigated landscape, a landscape permit is required which requires irrigation design review. Further, this Chapter mandates that any owner of landscape of over one (1) acre in size shall comply with local agency programs that may be instituted relating to irrigation audits, surveys and water use analysis, and shall maintain landscape irrigation facilities to prevent water waste and runoff.

Chapter 15.64, Recycling and Diversion of Construction and Demolition Debris establishes that sixty percent of waste tonnage from construction, demolition, and alteration projects shall be diverted from disposal. This may be accomplished by delivering mixed debris to a recycling facility approved by the city, separating recyclables at the job site and delivering them to reuse and recycling facilities approved by the city, and/or reusing concrete or other waste materials at the jobsite. All new construction projects greater than twenty-five thousand dollars and all complete demolition projects within the city shall comply with the provisions of this chapter.

Daly City Sewer System Management Plan

The purpose of the Sewer System Management Plan (SSMP) is to provide guidance to the City in the operation, maintenance, and rehabilitation of the sewer assets of the City of Daly City. The SSMP includes construction standards and specifications for the installation and repair of the collection system and its associated infrastructure.

3.19.1.2 *Existing Conditions*

Water Service and Supply

Water service to the project site is provided by the Daly City Department of Water and Wastewater Resources (DWWR). The City relies on local groundwater pumping from five municipal wells, which extracts groundwater from the Westside Groundwater Basin, and water supply purchases from the San Francisco Public Utilities Commission (SFPUC).[89] The City also uses tertiary recycled water from the North San Mateo County Sanitation District wastewater treatment plant, to offset potable/aquifer water demands. Currently recycled water is used to water five golf courses, two city parks, and road median strips. Recycled water is not a source of water proposed for the project site.

[89] Brown and Caldwell. *Daly City 2020 Urban Water Management Plan*. June 2021. Page 6-8.

The project site is currently served by a six-inch water main in Serramonte Boulevard and a 10-inch water main in at the northern terminus of Campus Drive and running north through the project site. The project site used approximately 33,000 gallons per day (gpd) of water in 2020.[90]

Sanitary Sewer/Wastewater Treatment

Sanitary sewer lines in the project area are inspected and maintained by the City of Daly City Department of Water and Wastewater Resources. A 10-inch sanitary sewer line is located in Serramonte Boulevard. Wastewater collection and treatment for Daly City is managed by the North San Mateo County Sanitation District (NSMCSD), which is a subsidiary of the City of Daly City. Wastewater produced within the District is treated at the NSMCSD Treatment Plant (WWTP), which is located at the corner of John Daly Boulevard and Lake Merced Boulevard.

The City of Daly City's WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (gpd). However, the NSMCSD discharges and operates the WWTP at or below the permitted average dry weather flow rate of eight million gpd (averaged over three consecutive dry months) and does not anticipate a need to increase the permitted flow rate in the next five years.

The project site currently generates approximately 28,050 gpd of wastewater.[91]

Storm Drainage

As discussed in Section 3.10 Hydrology and Water Quality, the project site is located within the Colma Creek Watershed which extends from San Bruno Mountain to its outlet at the San Francisco Bay just north of the San Francisco Airport and south of Point San Bruno. The northwest portion of the project has been developed with the approved Parcel A Development project (JUHSD Faculty and Staff Housing project). The northeast corner of the project site (Parcel B) is currently developed with a surface parking lot and portable building units. The southwest corner of the project site is developed with the JUHSD demonstration garden. The remainder of the project site it developed with surface parking lots and buildings. Surface runoff from the project site is collected in area drains and conveyed to a 24-inch storm drain in Serramonte Boulevard that flows to the east.

Solid Waste

Solid waste is collected from Daly City homes and businesses and is processed by Republic Services of Daly City and transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. In 2001, Browning-Ferris Industries, owner of the Ox Mountain Landfill, obtained a revised solid waste facility permit for Ox Mountain to increase the permitted disposal acreage from 173 acres to 191 acres. According to CalRecycle, the landfill has a remaining capacity of 22,180,000 cubic yards and an estimated closure date of 2034.[92]

[90] Brown and Caldwell. *Water Supply Assessment for Jefferson Union High School District Master Plan Project.* December 2021. Page 2-2.
[91] Sewage demand is estimated to be 85 percent of potable water demand (0.03 mgy).
[92] CalRecyle. SWIS Facility Detail. Cordina Los Trancos (Ox Mtn) (41-AA-0002). Accessed on August 4, 2022. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223.

Electric, Telecommunication, and Natural Gas Facilities

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. PG&E supplies natural gas services to the project area. Telecommunication services are also provided through underground infrastructure by various service providers.

3.19.2 Impact Discussion

For the purpose of determining the significance of the project's impact on utilities and service systems, would the project:

1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

3.19.2.1 *Project Impacts*

Impact UTL-1:	The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. **(Less than Significant Impact)**

Water

The proposed project would connect to an existing 10-inch water main located in Entry Drive. Additional 10-inch water mains would be installed along the new streets within the project site. Water service to the entire project site would be provided via the newly constructed water lines. Construction of this new water line would be subject to construction-related mitigation measures within this EIR and therefore, would not result in a significant environmental effect.

Wastewater/Sanitary Sewer

The project proposes to connect to the existing 10-inch sanitary sewer line in Serramonte Boulevard and six-inch sewer line in Callan Boulevard. In addition, the project would reroute existing 10-inch

sewer lines running through the project site to better align with future development under the proposed project. Woodard & Curran estimated the average daily wastewater flow to be generated by the proposed project and its effects on the existing wastewater system (see Appendix O). The proposed project's wastewater would not cause any capacity deficiencies in the rerouted on-site sewers or in the sewers on Serramonte Boulevard downstream, however, the project flows would contribute to capacity deficient sewers in the Serramonte Center and the 21-inch trunk sewer crossing the I-280 freeway to Junipero Serra Boulevard. The need for a 30-inch relief sewer line parallel to the 21-inch sewer crossing I-280 was identified in the 2009 Collection System Evaluation and Improvement Plan, and the project would be required to contribute a proportional fair share contribution toward the construction of the relief sewer line.

Stormwater Drainage

As discussed in Section 3.10 Hydrology and Water Quality, future development of the proposed Precise Plan would result in an overall increase of 88,545 square feet of impervious surfaces compared to existing conditions; however, the project would be designed to retain stormwater on-site and not exceed pre-project stormwater flows during a 10-year design storm. Thus, future development implementing the proposed Precise Plan, in conformance with applicable regulations, would not result in significant impacts to the storm drain system.

Electricity, Telecommunication, and Natural Gas Facilities

The project would tie-in to the existing electricity, telecommunication, and natural gas lines throughout the project site. Any conductor upsizing work would be performed by PG&E as needed.

All project construction associated with relocating existing facilities and extending connections to existing facilities would be subject to the construction-related mitigation measures within this EIR and conditions of approval typically applied to development project entitlements. Therefore, any needed relocation of existing facilities and extension of connections to existing facilities would not result in a significant environmental effect. **(Less than Significant Impact)**

Impact UTL-2:	The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

Based on the WSA prepared for the project, in the event the Bay Delta Plan is implemented,[93] water demand would exceed supply in normal, single-dry, and multiple-dry year scenarios by 2023. Without implementation of the Bay Delta Plan, water demand would not exceed supply in normal, single-dry, and multiple-dry year scenarios through 2045. The project would increase water use on the site by approximately 202,600 gpd.[94] The project would result in a population increase that is within the estimated population projections used in the City's UWMP. The City identifies demand

[93] The implementation of the Bay Delta Plan is currently in litigation which creates uncertainty in the available supply for Daly City.

[94] Brown and Caldwell. *Hydraulic Analysis for the Westlake South Project.* April 2021. 712 net new residents x 60 gallons per capita per day = 42,720 gpd; 10,800 sf x 0.0450 gallons per sf per day = 486 gpd. Total project water use estimate: 42,720 gpd + 486 gpd = 43,206 gpd.

reduction actions in the UWMP that could be used to reduce water demand, ranging from voluntary reductions to prohibiting landscape irrigation. The use of demand reduction measure, which could be required City-wide in single-dry and multiple-dry year scenarios, ensures the City would have adequate water supply under all scenarios. The City, therefore, would have sufficient water supplies to serve the project and cumulative water demand during normal, dry, and multiple dry years. **(Less than Significant Impact)**

Impact UTL-3:	The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **(Less than Significant Impact)**

The WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (mgd). The General Plan EIR determined that full buildout of the General Plan would generate approximately 6.66 mgd which is below the permitted flow rate of eight mgd, leaving 1.34 mgd of unused capacity at buildout. The project would add approximately 191,793 gpd (0.19 mgd) of wastewater to be treated at the WWTP, or approximately 14 percent of the unused capacity.[95] The project, therefore, results in a less than significant increase in wastewater flow. In addition, the WWTP monitors its wastewater to ensure that it meets all requirements and the RWQCB routinely inspects treatment facilities to ensure permit requirements are met. For these reasons, there would be adequate capacity at the WWTP. **(Less than Significant Impact)**

Impact UTL-4:	The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

Waste generation and disposal data for Daly City is maintained by CalRecycle. According to CalRecycle, the total amount of solid waste landfilled from Daly City in 2021 was 45,636 tons.[96] The project would generate approximately 530 tons of solid waste per year.[97] The Ox Mountain Landfill has a remaining capacity of approximately 22,180,000 cubic yards of solid waste.[98] The project would increase solid waste generation in the City by approximately one percent and, therefore, would not generate solid waste in excess of local standards or capacity and would not impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

[95] Woodard & Curran. *Sanitary Sewer Capacity Evaluation for JUHSD Precise Plan*. October 2021. Page 2.
[96] CalRecycle. "Disposal Rate Calculator". Accessed August 15, 2022. https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator.
[97] Illingworth & Rodkin, Inc. *Serramonte Del Rey Campus Redevelopment Project Air Quality and Greenhouse Gas Assessment.* June 17, 2022. Attachment 2: CalEEMod Modeling Inputs and Outputs.
[98] CalRecycle. "Solid Waste Information Sheet: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002)." Accessed August 4, 2022. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223

Impact UTL-5:	The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste. **(Less than Significant Impact)**

The project would comply with solid waste management and reductions statutes and regulations including CALGreen requirements and Chapter 15.64 of the Daly City Municipal Code for recycling and salvaging of construction and demolition waste. **(Less than Significant Impact)**

3.19.2.2 *Cumulative Impacts*

Impact UTL-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact. **(Less than Significant Cumulative Impact)**

Relocation or construction of new or expanded utility facilities by other projects would also be subject to similar construction-related mitigation measures as the proposed project. The City's UWMP and the WSA prepared for the project, which accounts for cumulative demand, both concluded the City will have sufficient water supplies to accommodate growth within its service jurisdiction and will meet any potential supply shortfalls experienced during dry year conditions, through a combination of a short-term conservation program. With regard to wastewater treatment, the WWTP has an available capacity of approximately 1.34 mgd after full buildout of the General Plan. The Serramonte Shopping Center Expansion and Seton Medical Center Expansion projects are consistent with the City's General Plan and, therefore, their wastewater generation is already accounted for. The Serramonte Condominiums and Hotel project would generate approximately 88,660 gdp (0.09 mgd) of wastewater, which could be accommodated by the remaining capacity at the WWTP, in addition to the proposed project. Other projects would also be required to comply with CALGreen and Chapter 15.64 of the Daly City Municipal Code, thereby also reducing their construction and demolition waste by at least 60 percent. As previously discussed, Ox Mountain Landfill has a remaining capacity of approximately 22,180,000 cubic yards and an estimated closure date of 2034. Therefore, the Ox Mountain landfill could sufficiently accommodate the proposed project and the cumulative projects listed in Table 3.0-1. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact. **(Less than Significant Cumulative Impact)**

3.20 WILDFIRE

3.20.1 Environmental Setting

3.20.1.1 *Existing Conditions*

The California Department of Forestry and Fire Protection (Cal Fire) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZ), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. The project site is not located in a FHSZ.[99]

3.20.2 Impact Discussion

For the purpose of determining the significance of the project's impact on wildfire, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

3.20.2.1 *Project Impacts*

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts. **(No Impact)**

3.20.2.2 *Cumulative Impacts*

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in cumulative wildfire impacts. **(No Cumulative Impact)**

[99] CALFire. San Mateo County Fire Hazard Severity Zones in SRA. Adopted by CALFire on November 7, 2007. Map. Accessed August 15, 2022. https://osfm.fire.ca.gov/media/6802/fhszs_map41.pdf

SECTION 4.0 GROWTH-INDUCING IMPACTS

For the purposes of this project, a growth-inducing impact is considered significant if the project would:

- Cumulatively exceed official regional or local population projections;
- Directly induce substantial growth or concentration of population. The determination of significance shall consider the following factors: the degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds planned levels in local land use plans; or
- Indirectly induce substantial growth or concentration of population (i.e., introduction of an unplanned infrastructure project or expansion of a critical public facility (road or sewer line) necessitated by new development, either of which could result in the potential for new development not accounted for in the Daly City 2030 General Plan).

Impact GRO-1:	The project would not foster or stimulate significant economic or population growth in the surrounding environment. **(Less than Significant Impact)**

Under the existing General Plan and 1985 Precise Plan, the project site would be allowed to be developed with up to 175 residential units and 700,000 square feet of office uses. Compared to what is allowed by the 1985 Precise Plan, the project would result in a net increase of 1,060 residential units and a net decrease of 684,000 square feet of employment uses (office and retail). This net change in development would result in approximately 3,403 additional residents.[100] Compared to the buildout of the General Plan, the project would represent an approximately three percent net increase in the City's population.[101] While the project would result in an increase in population and housing compared to what is allowed in the adopted 1985 Precise Plan and General Plan, the project would be consistent with the City's goal of maximizing opportunities for higher-density housing (General Plan Policy HE-1 and Policy LU-4) and meeting the City's RHNA target (General Plan Policy HE-6). In addition, the project would result in a minimal increase in population (three percent increase) compared to the City's estimated ABAG 2035 population of 115,015. The project, therefore, would not induce growth in an area that is not already planned for increased development.

The project site is located in an urban area on an already developed site that is served by existing infrastructure, including roadways and utilities. The growth resulting from the implementation of the proposed project would incrementally increase the use of existing community service facilities (refer to Sections 3.15 Public Services and 3.16 Recreation). Utility improvements would be sized to serve the proposed development, and would not be sized to have excess capacity that would induce growth in the area. In addition, the project would pay all applicable impact fees and taxes, which would

[100] 1,235 (number of housing units proposed) minus 175 (number of planned housing units) equals 1,060 housing units. Based on the City's average number of persons per housing unit (3.21), the 1,060 units would generate 3,403 additional residents. As the majority of employment uses would be eliminated, demand for housing from new businesses was assumed to be zero. Source: State of California, Department of Finance. E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022. May 2022. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/.

[101] Buildout of the City's General Plan would result in 106,388 residents.

offset fiscal and service impacts to public facilities and services, including police and fire. As a result, growth associated with the implementation of the project would not have a significant impact on community service facilities, nor would it make a cumulatively considerable contribution to such impacts, requiring construction of new facilities that could cause significant environmental effects.

For the reasons discussed above, the project would not result in significant indirect growth-including impacts. **(Less than Significant Impact)**

SECTION 5.0 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

This section was prepared pursuant to CEQA Guidelines Section 15126.2(c), which requires a discussion of the significant irreversible changes that would result from the implementation of a proposed project. Significant irreversible changes include the irretrievable use of nonrenewable resources, the commitment of future generations to similar use, and irreversible damage resulting from environmental accidents associated with the project.

5.1.1 Irretrievable Use of Nonrenewable Resources

During construction and operation of the project, nonrenewable resources would be consumed. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Renewable resources, such as lumber and other wood byproducts, could also be used.

Energy, as discussed in more detail in Section 3.6 Energy, would be consumed during both the construction and operational phases of the project. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, site preparation, and construction of the buildings. The operational phase would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the site.

The project would result in a substantial increase in demand for nonrenewable resources; however, the project is subject to the standard California Code of Regulations Title 24 Part 6, CALGreen standards, City of Daly City Green Building requirements, and Recycling and Diversion of Construction and Demolition Ordinance. In addition, as discussed in Section 3.6 Energy, the electricity for the project would be provided by Peninsula Clean Energy from sources that are 100 percent carbon-free. For these reasons, future projects would minimize the use of nonrenewable energy resources.

5.1.2 Commitment of Future Generations to Similar Use

The project would redevelop a currently developed site surrounded by urban uses. Development of the proposed project would commit a substantial amount of resources to prepare the site, construct the buildings, and operate them, but it would not result in development in an area where urban development does not already exist.

5.1.3 Irreversible Damage Resulting from Environmental Accidents

The project proposes a residential, mixed-use development that is not a uniquely hazardous use nor likely to cause environmental accidents that impact adjacent areas. As discussed in Section 3.9 Hazards and Hazardous Materials, there are no significant unmitigable hazards and hazardous materials conditions on-site or off-site that would substantially affect the public and surrounding environment. Additionally, there are no significant unmitigable geology and soils impacts which

would result from implementation of the project. For these reasons, the project would not result in irreversible damage that may result from environmental accidents.

SECTION 6.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as it is proposed. The proposed project would not result any significant and unavoidable impacts, as all significant impacts are capable of being mitigated to acceptable levels by feasible mitigation measures included in the project.

SECTION 7.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR identify and evaluate alternatives to a project as it is proposed. Two key provisions from the CEQA Guidelines pertaining to the discussion of alternatives are included below:

> **Section 15126.6(a). Consideration and Discussion of Alternatives to the Proposed Project.** An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, 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, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
>
> **Section 15126.6(b). Purpose.** Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede, to some degree, the attainment of the project objectives, or be more costly.

Other elements of the CEQA Guidelines discuss that alternatives should include enough information to allow a meaningful evaluation and comparison with the proposed project. The CEQA Guidelines state that if an alternative would cause one or more additional impacts, compared to the proposed project, the discussion should identify the additional impact, but in less detail than the significant effects of the proposed project.

The three critical factors to consider in selecting and evaluating alternatives are: (1) the significant impacts from the proposed project that could be reduced or avoided by an alternative, (2) consistency with the project's objectives, and (3) the feasibility of the alternatives available. Each of these factors is discussed below.

7.1 SIGNIFICANT IMPACTS FROM THE PROJECT

7.1.1 Significant Unavoidable Impacts

As mentioned above, the CEQA Guidelines advise that the alternatives analysis in an EIR should be limited to potentially feasible alternatives that would avoid or substantially lessen any of the significant effects of the project and would achieve most of the project objectives. The project would not result in any significant, unavoidable impacts.

7.1.2 Less than Significant Impacts with Mitigation Incorporated

Alternatives may also be considered if they would further reduce impacts that are already less than significant because of required or proposed mitigation. Impacts that would be significant, but for which the mitigation is available to reduce them to less than significant levels include:

- Air Quality (construction criteria pollutants, TAC health risk)
- Biological Resources (bats, nesting birds)
- Cultural Resources (archaeological resource/human remains)
- Geology and Soils (paleontological resources)
- Hazards and Hazardous Materials (underground/aboveground storage tanks)
- Noise (construction noise)
- Transportation (vehicle miles traveled, construction traffic, pedestrian/bicycle safety, emergency access)
- Tribal Cultural Resources (unknown buried tribal cultural resources)

Table 7.4-2 summarizes the project and project alternatives impacts, including less than significant impacts with mitigation incorporated.

7.2 PROJECT OBJECTIVES

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project. While CEQA does not require that alternatives be capable of meeting all of the project objectives, their ability to meet most of the objectives is considered relevant to their consideration. The stated objectives of the project proponent include the following:

- Advance an innovative land use master plan to attract investment, stabilize District finances, increase funding for student education and attract and retain highly qualified teachers and staff.
- Permit development consistent with the City's General Plan that enables redevelopment of underutilized properties with higher-density, transit supportive development that facilitates bicycle and pedestrian access along an established, highly utilized transit corridor, as outlined in the 2020 Walk Bike Daly City Master Plan.
- Create a pedestrian scale neighborhood with an attractive public realm of park and outdoor spaces, inviting to the surrounding community and people of all ages.
- Maximize the number of new high-quality market-rate and affordable housing units as a well-designed, economically feasible, urban residential neighborhood with sufficient density to create a safe, active neighborhood, with development phasing subject to market conditions that provides flexibility with the sequence of construction of buildings, open space, streets, and infrastructure.
- Create opportunities to connect people with nature through open space design, a new recreational trail and immediate proximity to wooded hillside areas.
- Encourage active transportation with safe on and off-street bike routes and pedestrian-oriented urban design that encourages bicycle, pedestrian, and transit access to, from and through the site.

- Design traffic-calmed residential streets for low volume, slow vehicle access between the intersection of Highway 1 and Serramonte Boulevard and the existing Campus Drive south of the Plan Area.

7.3 FEASIBILITY OF ALTERNATIVES

CEQA, the CEQA Guidelines, and the case law on the subject have found that feasibility can be based on a wide range of factors and influences. The CEQA Guidelines advise that such factors can include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can "reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1])."

7.4 ALTERNATIVES ANALYSIS

7.4.1 Alternatives Considered But Rejected

7.4.1.1 *Location Alternative*

CEQA encourages consideration of an alternative site when significant effects of the project might be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant impacts of the project and meet most of the project objectives need be considered for inclusion in the EIR. In order to identify an alternative site that might reasonably be considered to "feasibly accomplish most of the basic purposes" of the project, and would also mitigate some or all of the significant impacts of the project, it is assumed that such a site would need to have the following characteristics:

- Approximately 20-acres or more in size;
- Located on land owned by the Jefferson Union High School District (JUHSD);
- Located on an underutilized, already developed property;
- Served by available infrastructure and nearby commercial amenities; and
- Immediately available.

The project objectives focus on developing residential uses on land owned by JUHSD to help stabilize JUHSD finances. JUHSD currently operates five high schools, including three in the City of Daly City (Westmoor, Jefferson, and Thornton High Schools) and two in the City of Pacifica (Oceana and Terra Nova High Schools), and the Serramonte Del Rey campus located on the project site. While these high school sites may have undeveloped space that meets the size requirement, they do not include underutilized facilities that would benefit from redevelopment to higher-density residential and commercial uses. In addition, JUHSD recently received approval for construction of a new district office and adult education building located adjacent to Westmoor High School (see Figure 2.2-6). This new building would replace the existing district office uses on the project site, rendering the current project site vacant and allowing for new tenants or redevelopment. Further, location alternatives were rejected because the potentially suitable sites located on JUHSD land would not reduce the identified less than significant construction criteria pollutant, TAC health risk, and construction noise impacts because construction would occur on these alternative sites in a

similar manner to the proposed project site and the surrounding mix of uses is similar (with sensitive residential and/or school receptors in the immediate vicinity). Other construction related impacts, such as disturbance of nesting or water quality impacts, would be similar and require the same mitigation identified for the subject site. Since no feasible alternative site was identified that would avoid or lessen the project impacts, a location alternative was not further analyzed.

7.4.1.2 *Mixed-Use Alternative*

The project proposes a mostly residential development with 1,035 residential units and 14,000 square feet of commercial uses. The Mixed-Use Alternative was considered to reduce the VMT per resident below the countywide threshold by introducing office uses to the site and creating a mixed-use live/work community to avoid or lessen the need for ongoing mitigation in the form of a TDM program that reduces project trips. The Mixed-Use Alternative includes 1,035 residential units and 230,000 square feet of office space. The modeling results, however, show that this alternative's VMT per resident would remain at 12 VMT and continue to exceed the countywide threshold of 11.6 VMT per resident. In addition, this alternative would generate 17.9 VMT per office employee, which would exceed the countywide threshold of 14.3 VMT and regionwide threshold of 13.1.[102] Further, this alternative would result in an additional 230,000 square feet of building square footage, resulting in greater construction impacts compared to the proposed project. Since the Mixed-Use Alternative would not reduce the VMT per resident and create a new office VMT impact, this alternative was rejected.

7.4.1.3 *Reduced Housing Alternative*

The purpose of a Reduced Housing Alternative would be to reduce the project's impacts that result from the overall scale of the development by developing a smaller program of development. Of the project's significant impacts, only air quality, noise, and transportation impacts could potentially benefit from a reduced housing alternative. All other impacts are related to site/ground disturbance, which any amount of development would incur. VMT is expressed as a per resident number; therefore, while a reduced housing alternative would reduce overall trips, it would not cause a change in the amount of VMT per resident. Thus, the VMT impact of the Reduced Housing Alternative would be the same as the proposed project. Construction criteria pollutant air quality emissions and construction noise impacts tied to the amount of building construction activity could be further reduced with a reduced housing alternative; however, the project's construction ROG emissions are related to architectural coatings applied in the last year of project construction. The Reduced Housing Alternative would have similar ROG emissions, as architectural coatings, during the last year of construction; therefore, this alternative would not result in similar ROG emissions impacts as the proposed project. This alternative would partially meet the project's objectives to redevelop underutilized properties with high-density development and maximize the number of market-rate housing units in order to stabilize JUHSD's finances; however, the cost of land improvement (i.e., demolition, grading, infrastructure, off-site improvements) would remain unchanged and the reduced housing would lower revenue generated to off-set those costs. In addition, the No Project – Existing Zoning Alternative is another reduced development alternative (see Section 7.4.2.2 below). For these reasons, this alternative was rejected.

[102] Fehr & Peers, Inc. *Serramonte Del Rey Precise Plan – Alternatives VMT*. April 2023.

7.4.2 Analyzed Alternatives

In addition to a "No Project" Alternative, the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that "would avoid or substantially lessen any of the significant effects of the project" (Section 15126.6[f]). The discussion below addresses alternatives which could reduce project impacts and are feasible from a physical land use, infrastructure, site suitability, and general plan consistency perspective, and whether the proponent can reasonably acquire, control, or otherwise have alternative access to the site. This Draft EIR does not evaluate the financial or economic feasibility of the alternatives. The components of these alternatives are described below, followed by a discussion of their impacts and how they would differ from those of the proposed project.

7.4.2.1 *No Project Alternative*

The CEQA Guidelines specifically require consideration of a "No Project" Alternative. The purpose of including a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (Section 15126.6[e][3][B])."

The No Project Alternative assumes that the project site would remain as it is today with the existing buildings being reoccupied.

Comparison of Environmental Impacts

The No Project Alternative would avoid all the project's environmental impacts.

Relationship to Project Objectives

The No Project Alternative would not meet most of the project objectives as no change would be made to the existing land uses at the site and the current land uses do not provide any residential facilities. In addition, the current project site design is low density and not transit oriented. The No Project Alternative could potentially partially meet the project's objective to attract investment and stabilize District finances by renovating the existing buildings and leasing them to new tenants, although the market for new office or other tenants to occupy the existing JUHSD headquarters campus is unknown.

Conclusion

Because the No Project Alternative would not result in any new development on the site, this alternative would avoid all environmental impacts of the project. This alternative would not, however, meet most of the project's objectives, in particular those related to providing substantial new housing opportunities on the site.

7.4.2.2 *No Project – Existing Zoning Alternative*

This alternative assumes the project is not approved and the project site is redeveloped consistent with the current zoning of PD-31 (Planned Development District).[103] The PD-31 zoning is the current 1985 Precise Plan for the project site, which allows for the development of up to 175 residential units (in addition to the units developed on Parcel A) and approximately 700,000 square feet of office space, resulting in approximately one millions square feet of building space.[104] Associated infrastructure and roadway improvements would also be required in order to construct the No Project – Existing Zoning Alternative. Based on the City's average number of persons per housing unit (3.21), the 175 residential units would generate 562 additional residents.[105] The 700,000 square feet of office space is estimated to generate approximately 2,100 employees (using an estimate of three employees per 1,000 square feet).

Comparison of Environmental Impacts

The No Project – Existing Zoning Alternative would result in the development of approximately 175 residential units and 700,000 square feet of office, while the proposed project would develop the site with 1,235 residential units (including Parcel A units) and up to 14,000 square feet of neighborhood-serving retail/commercial uses (in addition to 1,400 square feet for a Head Start childcare facility). Overall the No Project – Existing Zoning Alterative would result in approximately one million square feet of building space, while the proposed project would result in approximately 1.5 million square feet of building space. The No Project – Existing Zoning Alternative would trade residential density for office density; however, the intensity and duration of construction required in order to construct 700,000 square feet of office space and 175 residential units would less than the proposed project, as this alternative reduces the overall building square footage by approximately 500,000 square feet less. Given that the overall building square footage would be smaller than the proposed project, the No Project – Existing Zoning Alternative would result in lesser construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts.

As discussed above, the No Project – Existing Zoning Alternative would trade residential density for office density. As a result, VMT for this alternative is calculated based on a per resident and per employee metric. As shown in Table 7.4-1 below, the residential component of the No Project – Existing Zoning Alternative is projected to generate 12.2 VMT per resident (0.2 VMT higher than the proposed project), which is below the regionwide significance threshold of 12.4 VMT per resident, but in excess of the countywide threshold of 11.6 VMT per resident. The office component of this alternative is projected to generate 17.5 VMT per employee, which exceeds the regionwide significance threshold of 14.3 VMT and the countywide significance threshold of 13.1 VMT. As a result, the No Project – Existing Zoning Alternative would result in more significant VMT impacts than the proposed project in that it would increase the per resident VMT and introduce a significant office VMT impact.

[103] A smaller portion of the of the site in the northwest corner (Parcel A Development project) is zoned to PD-31A. The PD-31A zoning was specifically created to allow for the Parcel A Development project, which will construct 122 multifamily units. Since this project is already approved and under construction, the remainder of the project site would be developed consistent with the PD-31 zoning.
[104] Assumes a total of 297 residential units (Parcel A project [122] + existing zoning[175]) and each residential unit requires approximately 1,000 square feet of building space. 700,000 + 297,000 = 997,000.
[105] State of California, Department of Finance. *E-5 Population Estimates for Cities, Counties, and the State—January 1, 2021-2022*. May 2022.

Table 7.4-1: No Project – Existing Zoning Alternative VMT				
Level of Analysis	**Existing VMT per resident/employee**	**Significance Threshold[1]**	**Alternative VMT per resident**	**Significant Impact?[2]**
Countywide	13.6/16.8	11.6/14.3	12.2/17.5	**Yes/Yes**
Regionwide	14.6/15.4	12.4/13.1	12.2/17.5	No/**Yes**
Notes: [1] The significant threshold is 15 percent below the existing VMT per resident/employee. [2] Significant impacts shown in **bold**. Source: Fehr & Peers, Inc. *Serramonte Del Rey Precise Plan – Alternatives VMT*. April 2023.				

The No Project – Existing Zoning Alternative would result in the same or similar less than significant impacts (with mitigation) as the proposed project related to biology, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, tribal cultural resources, and utilities and service systems.

Relationship to Project Objectives

The No Project – Existing Zoning Alternative would not meet the project objective of providing new market-rate and affordable housing given this alternative would yield 175 units, substantially below the 1,235 proposed. This alternative would result in substantial office space on the project site, which is not an objective of the project.

Conclusion

The No Project – Existing Zoning Alternative would result in reduced impacts to construction criteria pollutant emissions, TAC health risk, construction noise, and construction traffic; however, it would result in a more significant VMT impact compared to the proposed project. This alternative would result in similar or same impacts to all other environmental resources. The No Project – Existing Zoning Alternative would not meet the project's objectives for providing new market-rate and affordable housing units and would partially meet the project's objective to redevelop an underutilized site with a high-density land use plan.

7.4.3 Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. Based on the above discussion, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided. However, Section 15126.6(e)(2) states that "if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In addition to the No Project Alternative, the No Project – Existing Zoning Alternative would lessen the project's construction criteria pollutant, TAC health risk, construction noise, and construction traffic impacts .

Table 7.4-2: Summary of Project and Project Alternative Impacts			
Impacts	**Proposed Project**	**No Project Alternative**	**No Project – Existing Zoning Alternative**
Aesthetics	LTS	**NI**	LTS
Agricultural and Forestry Resources	NI	NI	NI
Air Quality	SM	**NI**	SM
Biological Resources	SM	**NI**	SM
Cultural Resources	SM	**NI**	SM
Energy	LTS	**NI**	LTS
Geology and Soils	SM	**NI**	SM
Greenhouse Gas Emissions	LTS	**NI**	LTS
Hazards and Hazardous Materials	SM	**NI**	SM
Hydrology and Water Quality	SM	**NI**	LTS
Land Use	LTS	**NI**	LTS
Mineral Resources	NI	NI	NI
Noise	SM	**NI**	SM
Population and Housing	LTS	**NI**	LTS
Public Services	LTS	**NI**	LTS
Recreation	LTS	**NI**	LTS
Transportation/Traffic	SM	**NI**	SM
Tribal Cultural Resources	SM	**NI**	SM
Utilities and Service Systems	SM	**NI**	SM
Wildfire	NI	NI	NI
Meets Project's Objectives?	Yes	No	No
Notes: SU = Significant unavoidable impact; SM = Significant impact, but can be mitigated to a less than significant level; LTS = Less than significant impact; and NI = No impact. **Bold** text indicates being environmentally superior to the proposed project where the impact is to a lesser extent.			

SECTION 8.0 REFERENCES

The analysis in this Environmental Impact Report is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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SECTION 9.0 LEAD AGENCY AND CONSULTANTS

9.1 LEAD AGENCY

City of Daly City
Economic and Community Development Department

Michael Van Lonkhuysen, *Planning Manager*

9.2 CONSULTANTS

David J. Powers & Associates, Inc.
Environmental Consultants and Planners

Akoni Danielsen, *Principal Project Manager*
Tyler Rogers, *Project Manager*
Matthew Moore, *Project Manager*
Ryan Osaka, *Graphic Artist*

Archaeological/Historical Consultants, Inc.
Oakland, CA
Historic Assessment

Brown and Caldwell, Inc.
Walnut Creek, CA
Water Supply Assessment

Fehr & Peers, Inc.
Walnut Creek, CA
Transportation

Illingworth & Rodkin, Inc.
Cotati, CA
Air Quality, Greenhouse Gas Emissions, and Noise

Jim Martin
Walnut Creek, CA
Biological Resources

Slate Geotechnical Consultants, Inc.
Oakland, CA
Geotechnical Investigation

Strata Environmental Services, Inc
Knoxville, TN
Phase I Environmental Assessment

Tom Origer & Associates, Inc.
Rohnert Park, CA
Cultural Resources

Woodard & Curran, Inc.
San José, CA
Sewer Modeling

WRA, Inc.
San Rafael, CA
Biological Resources Peer Review

SECTION 10.0 ACRONYMS AND ABBREVIATIONS

ABAG	Association of Bay Area Governments
ACM	Asbestos-containing material
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
BAAQMD	Bay Area Air Quality Management District
Bgs	Below ground surface
BMPs	Best Management Practices
Btu	British thermal units
CalARP	California Accidental Release Program
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalTrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CBC	California Building Code
C/CAG	City/County Association of Governments
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQA	California Environmental Quality Act
CFCs	Chlorofluorocarbons
CGS	California Geological Survey
CH_4	Methane
C-MU	Commercial - Mixed Use
CMP	Congestion Management Plan
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
CRHR	California Register of Historical Resources

CUPA	Certified Unified Program Agency
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
DU	Dwelling unit
DWWR	Department of Water and Wastewater Resources
EIR	Environmental Impact Report
EO	Executive Order
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHBM	Flood Hazard Boundary Map
FHSZ	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHGs	Greenhouse gases
Gpcd	Gallons per capita per day
Gpd	Gallons per day
GWP	Global warming potential
HASP	Health and Safety Plan
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HI	Hazard Index
HSWA	Federal Hazardous and Solid Waste Amendments
HVAC	Heating, ventilation, and air conditioning
In./sec	Inches/second
ITE	Institute of Transportation Engineers
LBP	Lead-based paint
LID	Low-impact development

LOS	Level of service
MBTA	Migratory Bird Treaty Act
MEI	Maximally exposed individual
MGY	Million gallons per year
$MMTCO_2e$	Million metric tons of CO_2E
MND	Mitigated Negative Declaration
Mpg	Miles per gallon
Mph	Miles per hour
MRP	Municipal Regional Stormwater NPDES Permit
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NCFA	North County Fire Authority
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
N_2O	Nitrous oxide
NOD	Notice of Determination
NOI	Notice of Intent
NO_x	Nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSFHA	Non-Special Flood Hazard Area
NSMCSD	North San Mateo County Sanitation District
O_3	Ground-level ozone
OITC	Outdoor-Indoor Transmission Class
OPR	Office of Planning and Research
PCBs	Polychlorinated biphenyls
PCE	Peninsula Clean Energy
PD	Planned Development
PDAs	Priority Development Areas
PFCs	Perfluorocarbons
PM	Particulate matter

PPV	Peak particle velocity
RAW	Removal Action Workplan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Need Allocation
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
Sf	Square feet
SF_6	Sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCEHSD	San Mateo County Environmental Health Services Division
SMGB	State Mining and Geology Board
SMOA	San Mateo County Operational Area
SO_x	Sulfur oxide
SR	State Route
STC	Sound Transmission Class
STLC	Soluble Threshold Limit Concentration
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
TAZ	Transportation Analysis Zone
TCRs	Tribal Cultural Resources
TIA	Traffic Impact Analysis
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban water management plan
VMT	Vehicle miles traveled

Mitigation Monitoring and Reporting Program

Serramonte Del Rey Campus Redevelopment Project

November 2023

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
Air Quality				
Impact AIR-2: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. **(Less than Significant Impact with Mitigation Incorporated)**	**MM AIR-2.1:** BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times a day and at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content shall be verified by lab samples or moisture probe. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using a wet power vacuum street sweeper at least once per day. The use of dry power sweeping shall be prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph.	The project applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit.	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph and visible dust extends beyond site boundaries. • Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction adjacent to			

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	sensitive receptors. Wind breaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • Avoid tracking of visible soil material on to public roadways by employing the following measures if necessary: (1) Site accesses to a distance of 100 feet from public paved roads shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel and (2) washing truck tires and construction equipment of prior to leaving the site. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.			

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	MM AIR-2.2: Selection of Construction Equipment: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards PM (PM10 and PM2.5), if feasible, otherwise, • Use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control equivalent to California Air Resources Board (CARB) Level 3 verifiable diesel emission control devices that altogether achieve a 50-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination). • Use of electrical or non-diesel fueled equipment. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater. Elements of the plan could include a combination of some of the following measures:	The applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction. If the applicant develops an alternative construction operation plan, the applicant shall be responsible for obtaining a qualified air quality expert to review the construction operation plan.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit. If an alterative construction operation plan is developed, that plan shall be reviewed by a qualified air quality expert and the the Director of Economic and Community	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	• Implementation of Tier 4 or alternatively fueled equipment, • Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors, • Use of electrically-powered equipment, • Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered, • Change in construction build-out plans to lengthen phases, and • Implementation of different building techniques that result in less diesel equipment usage. Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.		Development prior to the issuance of a demolition or grading permit.	
	MM AIR-2.3: Low Volatile Organic Compounds (VOC) Coating: The project shall use low volatile organic compound or VOC (i.e., ROG) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings), for at least 50 percent of all residential and nonresidential interior paints and 50 percent of exterior paints. This	The applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 50 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used.		by the Director of Economic and Community Development prior to the issuance of a building permit.	
Impact AIR-3: The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact with Mitigation Incorporated)**	**MM AIR-3.1:** Prior to the issuance of a grading permit, the applicant shall provide the City with the most recent construction phasing schedule by parcel for buildout of the proposed Precise Plan. If the most recent construction phasing schedule increases the number of units per construction phase compared to the construction phasing assumed in the air quality analysis of this EIR, the applicant shall prepare an updated community health risk assessment to confirm that the new phasing will not result in any new or more significant air quality impacts not previously disclosed in this EIR. The updated community health risk assessment shall be reviewed and approved by the Director of Community Development or Director's designee.	Prior to the start of construction, the applicant shall submit most recent construction phasing schedule to the Economic and Community Development Department.	The applicant shall submit the most recent construction phasing schedule and/or updated community health risk assessment for review and approval by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit.	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
Biological Resources				
Impact BIO-1: The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. **(Less than Significant Impact with Mitigation Incorporated)**	**MM BIO-1.1:** • If construction is initiated during the non-breeding season (September 1 to January 31), then vegetation removal, building demolition and other construction may proceed with no restrictions. • If initial building demolition, vegetation removal, and construction is proposed during the nesting season (February 1 to August 31), a focused survey for nesting raptors and other native birds shall be conducted by a qualified biologist within 14 days prior to the onset of construction in order to determine whether any active nests are present on the site and surrounding area within 250 feet of proposed construction. The survey shall be reconducted any time construction has been delayed or curtailed for more than 14 days during the nesting season. • If no active nests are identified during the construction survey period, then building demolition, vegetation removal, and other construction may proceed with no restrictions. • If active bird nests are found, an adequate setback shall be established by a qualified	The project applicant and contractors shall be responsible for implementing the mitigation measures prior to project construction, including tree removals or building demolition.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit. A final report of nesting birds, including any protection measures, shall be submitted to the Director of Community Development prior to the issuance of a	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	biologist, approved by the City Planning Division, around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the CDFW and may vary depending on species and sensitivity to disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated elsewhere on the site outside this zone. • A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is		grading permit or demolition permit, and any tree removal	

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	initiated during the non-nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria.			
	MM BIO-1.2: Adequate measures shall be taken to avoid roosting by special-status bat species as a result of tree removal and building demolition, specifically: • To the extent feasible, any tree removal or trimming that is deemed necessary by a certified arborist to maintain tree health shall be conducted outside of the bat maternity season (i.e., generally avoiding tree removal or trimming April through October). • Building demolition shall, to the extent feasible, be conducted outside of the bat maternity season (i.e., generally avoiding demolition April through October). • If tree removal, trimming, or building demolition occurs within bat maternity season (i.e., generally April through October), a pre-construction bat roost assessment shall be conducted by a qualified biologist at least 14 days and no more than 30 days prior to tree removal or building demolition to determine if bats roosts are present that may be impacted by project activities.	The project applicant and contractors shall be responsible for implementing the mitigation measures prior to project construction, including tree removal and building demolition.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit. A final report of bats, including any protection measures, shall be submitted to the Director of Community Development prior	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	• If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roosts until the end of the maternity roosting season. The qualified biologist shall also contact the California Department of Fish and Wildlife (CDFW) and coordinate with CDFW on measures to protect the roosts. • Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs shall remain on the ground for at least 24-hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition. A report of findings shall be prepared by the qualified biologist and submitted to the Director of Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the		to the issuance of a grading permit or demolition permit, and any tree removal	

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.			
Cultural Resources				
Impact CUL-2: The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**	**MM CUL-2.1:** Undiscovered Archaeological Resources. 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's Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. the City's 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	The project applicant and contractors shall be responsible for implementing the mitigation measures before and during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition or grading permit.	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC. **MM CUL-2.2:** 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 certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.		If archaeological resources are identified, a final report shall be submitted to the City's Planning Manager prior to issuance of certificate of occupancy.	
Impact CUL-3: The project would not disturb any human remains, including those interred outside of dedicated cemeteries. **(Less than Significant Impact with Mitigation Incorporated)**	**MM CUL-3.1:** Human Remains. If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's 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	The project applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community	Director of Economic and Community Development

MITIGATION MONITORING AND REPORTING PROGRAM Serramonte Del Rey Campus Redevelopment Project				
Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	(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.		Development prior to the issuance of demolition or grading permits.	
Geology and Soils				
Impact GEO-6: The project would not directly or indirectly destroy a unique paleontological resource	**MM GEO-6.1:** Unique Paleontological and/or Geologic Features and Reporting. 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	The project applicant and contractors shall be responsible for implementing the	All measures shall be printed on all construction documents, contracts, and	Director of Economic and Community Development

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
or site or unique geological feature. **(Less than Significant Impact with Mitigation Incorporated)**	within 25 feet shall cease and the City's Planning Director notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. 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.	mitigation measures during all phases of construction.	project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of demolition or grading permits. If completed, the paleontological assessment shall be submitted to the City prior to issuance of occupancy permits.	
Hazards and Hazardous Materials				
Impact HAZ-2: The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident	**MM HAZ-2.1:** Prior to the issuance of demolition, grading, or building permits for projects on Parcels C-E, the applicant shall remove the existing underground storage tanks (USTs) and aboveground storage tanks (ASTs) in accordance with the San Mateo County Department of Environmental Health's (SMCDEH) Underground Storage Tank Program and Aboveground	Prior to issuance of demolition, grading , or building permits allowing any demolition or construction activities on Parcels	Prior to the issuance of demolition, grading, or building permits on Parcels C-E, the applicant shall	Director of Economic and Community Development and San Mateo County Department of

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**	Petroleum Storage Tank Program. During removal of the ASTs and USTs, contractors shall observe for staining and spilled contaminants. If stains and/or spills are observed, an Environmental Professional shall be retained to collect soil samples for laboratory analysis in accordance with commonly accepted environmental protocols. If contaminants are identified at concentrations exceeding applicable screening levels published by the RWQCB, DTSC and/or EPA , appropriate mitigation measures, such as, but not limited to, a Soil Management Plan and Health Safety Plan, shall be incorporated into the demolition permit. Approval by an appropriate regulatory agency (i.e., RWQCB, DTSC or SMCDEH) shall be obtained prior to conducting earthwork activities in the vicinity of the impacted soil. The applicant shall provide documentation of the safe removal of all existing USTs and ASTs consistent with SMCDEH requirements to Director of Economic and Community Development or Director's designee for review and approval.	C-E, the applicant shall be responsible for removing the existing underground and aboveground storage tanks.	remove the existing underground and aboveground storage tanks in accordance with the San Mateo County Department of Environmental Health's (SMCDEH) Underground Storage Tank Program and Aboveground Petroleum Storage Tank Program. Confirmation from the SMCDEH of the tank removal shall be submitted to the Director of Economic and Community	Environmental Health

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
			Development for review. If residual contamination is found during removal of the tanks, the applicant shall obtain cleanup approval from San Mateo County Department of Environmental Health prior to conducting earthwork activities in the vicinity of the impacted soil. The San Mateo County Department of Environmental Health approval shall be submitted to the Director of	

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
			Economic and Community Development for review.	
Noise and Vibration				
Impact NOI-1: The project would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **(Less than Significant Impact with Mitigation Incorporated)**	**MM NOI-1.1:** The applicant shall develop a construction noise control plan for each construction phase, including, but not limited to, the following available controls: • Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. • Construct a temporary noise barrier, where feasible, between Parcel C and Shasta High School to screen noise-generating equipment. Temporary noise barrier fences would provide a 7 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps. To achieve a 7 dBA of noise	The project applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the Director of Economic and Community Development prior to the issuance of a demolition, grading, or building permit.	Director of Economic and Community Development

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	reduction the temporary barrier shall block line of sight to the top of the Shasta High School building windows. • Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. • Unnecessary idling of internal combustion engines should be strictly prohibited. • Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. • Utilize "quiet" air compressors and other stationary noise sources where technology exists. • Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise			

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	sources and noise-sensitive receptors nearest the project site during all project construction. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Route construction-related traffic along major roadways and as far as feasible from sensitive receptors. • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The			

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.			
Transportation				
Impact TRN-2: The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact with Mitigation Incorporated)**	**MM TRN-2.1:** Prior to issuance of building permits, the project applicant shall develop a transportation demand management (TDM) plan for the proposed project (except for the Parcel A development project which has already been occupied) in accordance with C/CAG's Transportation Demand Management Policy Implementation Guide, including any anticipated phasing, and shall submit the TDM Plan to the City for review and approval. The TDM Plan shall identify trip reduction strategies as well as mechanisms for funding and overseeing the delivery of trip reduction programs and strategies. The TDM Plan shall be designed to achieve the trip reduction, as required to reduce the VMT per resident from 12.0 to 11.6. The TDM Plan shall describe which measures apply to the entire site and which, if any, apply on a parcel-by-parcel basis.	Prior to issuance of building permits, the applicant shall develop a TDM Plan that identifies trip reduction strategies to reduce vehicle miles traveled (VMT) per resident from 12.0 to 11.6. The project applicant shall be responsible for implementing a TDM Plan prior to building occupancy	The TDM Plan shall be submitted to the City Traffic Engineer for review and approval. The results of the biennial reviews shall be submitted to the City Traffic Engineer for review and approval. If the program's VMT reduction	City Traffic Engineer

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	Trip reduction strategies applicable to the proposed project may include, but are not limited to, the following: • Provide Secure and Accessible Bike Parking • Provide Bicycle Maintenance Facilities • Price and Unbundle Parking • Provide Carpooling Programs • Implement Car-Sharing Program • Implement Loaner Bike Program • Provide a Transit Riders Guide • Provide a Dedicated Transportation Coordinator • Provide an Online TDM Information Center • Free Trial Rides on Transit Services • Implement a Subsidized or Discounted Transit Program The TDM plan shall indicate the estimated Vehicle Trip Reduction (VTR) for each strategy proposed based on published research or guidelines. For TDM measures containing ongoing operational VTR strategies, the TDM plan shall include an ongoing monitoring and enforcement program to ensure the Plan is implemented on an ongoing basis during project operation. For VTR strategies involving	and shall conduct annual evaluations of the effectiveness of the TDM Plan for the first six years of occupancy.	goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the	

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	physical improvements, the project shall obtain the necessary permits/approvals from the City and install the improvements prior to building occupancy. Applicant will resubmit TDM Plan if there is a material adverse impact resulting from a change from the permitted uses (i.e., unit count, use type, phasing). The TDM Plan shall require annual evaluation of the program by the property owner, to determine if the program goals in reducing automobile travel are satisfied and to assess the effectiveness of the various strategies implemented. The property owner shall be required to conduct biennial self-certification for the first six years of project occupancy per the C/CAG TDM Program. The property owner shall conduct annual travel surveys and driveway counts to monitor the amount of automobile travel generated by the project. The goal of the TDM Plan and programs shall be to reduce the project's daily VMT per resident from 12.0 to 11.6. Based on the results of the surveys, the TDM programs shall be increased if these requirements are not met. Annual travel surveys and driveway counts (TDM program monitoring) shall be conducted for the first two years following project occupancy. The results of the monitoring program and travel surveys shall be submitted to the City for review and approval. If the program VMT reduction goals are		program's VMT reduction goals are satisfied.	

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	met in the first six years, annual monitoring and surveys shall be suspended. If the program's VMT reduction goals are not satisfied, site management shall prepare and submit for City approval a Corrective Action Plan. The Corrective Action Plan shall detail the additional TDM measures to be implemented on site and their expected travel/mode split reduction. Additional annual travel surveys and driveway counts shall be conducted for the two years following the implementation of the Corrective Action Plan to determine if the program's VMT reduction goals are satisfied.			
Impact TRN-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact with Mitigation Incorporated)**	**MM TRN-3.1:** A Construction Traffic Management Plan shall be developed and implemented to minimize impacts to the transportation system. The Construction Traffic Management Plan shall detail the Project's construction schedule, vehicle type time-of-day plans, route planning, advanced public notices of partial or full street closures or traffic diversion, and other strategies to reduce potential conflicts during construction. The plan shall include, but not be limited to, the following: • Identification of the traffic controls and methods proposed during each phase of Project construction. Provision of safe and adequate	The project applicant and contractors shall be responsible for implementing the mitigation measures during all phases of construction.	All measures shall be printed on all construction documents, contracts, and project plans and shall be reviewed by the City Traffic Engineer prior to the issuance of a demolition, grading, or building permit.	City Traffic Engineer

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
	access for vehicles, transit, bicycles, and pedestrians. Traffic controls and methods employed during construction shall be in accordance with Daly City standards and the requirements of the California Manual of Uniform Traffic Control Devices (CA MUTCD 2014, Revision 6). • Provision of notice to relevant emergency services, thereby avoiding interference with adopted emergency plans, emergency vehicle access, or emergency evacuation plans. • A prohibition on all construction truck activity during the weekday morning and evening peak commute periods (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). • Preservation of emergency vehicle access. • Identification of approved truck routes in communication with Daly City staff. • Location of staging areas and the location of construction worker parking. • Identification of the means and locations of the separation (i.e. fencing) of construction areas and adjacent active uses. • The provision of flaggers at all on-site locations where construction trucks and			

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	construction worker vehicles conflict with vehicle, bicycle, transit, or pedestrian traffic. • Provision of a point of contact for residents to obtain construction information, have questions answered and convey complaints.			
	MM TRN-3.3: As part of the project's final design, each residential facility's garage entrance accessed via the public right of way shall be designed to provide adequate storage for expected vehicle queues. The amount of storage shall be calculated based on the individual garage size and forecast rates of arrival and departure. A minimum stacking distance of 25 feet shall be provided between the back of curb and gate installation at the entrance to each residential garage entrance. The purpose of this space is to minimize the instance of vehicles queued across sidewalks and bicycle facilities. These queue calculations shall be performed for each garage and submitted to the City Engineer with planning/building permit for review and approval.	Prior to issuance of a building permit, the applicant and contractors shall be responsible for including adequate queueing capacity for all parking garages.	The applicant shall prepare queue calculations for all proposed parking garages to ensure adequate vehicle storage capacity. Queue calculations shall be reviewed and approved by the City Traffic Engineer prior to issuance of a building permit.	City Traffic Engineer
Impact TRN-4: The project would not result in inadequate emergency access. **(Less than Significant Impact**	**MM TRN-4.1:** In accordance with City and North County Fire Authority requirements and design standards, all future development within the project site shall provide even surface pavement, appropriate signage, delineation, and other features at all emergency access points and internal roadways to	Prior to issuance of a building permit, the applicant and contractors shall be responsible for complying with all	Provide evidence of approval from the North County Fire Authority for all emergency	City Traffic Engineer and North County Fire Authority

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Impacts	**Mitigation and/or Avoidance Measure(s)**	**Timeframe and Responsibility for Implementation**	**Method of Compliance**	**Oversight of Implementation**
with Mitigation Incorporated)	accommodate emergency vehicles. As part of the final design and permitting process, each proposed development shall seek and obtain approval from the North County Fire Authority.	North County Fire Authority emergency access design requirements.	access design requirements.	

Source: City of Daly City. *Serramonte Del Rey Campus Redevelopment Project Final Environmental Impact Report.* November 2023.