



# LAMPHIER-GREGORY

## MEMO

---

TO: Laura Russell, Senior Planner  
City of San Carlos Planning Division  
600 Elm Street  
San Carlos, CA 94070-3085

FROM: Rebecca Auld, Senior Planner  
Lamphier-Gregory

SUBJECT: **Meridian 25 Office Project IS/MND – Review and Discussion of Comment Letters**

DATE: June 10, 2016

---

### PURPOSE OF THIS MEMO

This memo provides a brief discussion of comments received in response to the Initial Study/Mitigated Negative Declaration (“IS/MND”) for the Meridian 25 Office Project (“Project”). Although the California Environmental Quality Act (“CEQA”) does not require a lead agency to formally respond to written comments received on an IS/MND, this memorandum is being provided by the IS/MND preparer to demonstrate that the comments do not present substantial evidence supporting a fair argument that the Project may have a significant environmental impact, or that the IS/MND should be revised and recirculated for public review. While this memo is focused to environmental consideration, all comment letters have been provided to City staff and decision makers for their information and consideration.

### SUMMARY OF CONCLUSIONS

In summary, the letters have not raised any issues that would require recirculation of the IS/MND or preparation of an EIR under section 15073.5 of the CEQA Guidelines as no new significant effects were identified and the significance of identified impacts remains unchanged and do not result in significant impacts that cannot be mitigated.

### COMMENTS RECEIVED

The 30-day comment period for the IS/MND ran from May 6, 2016 to June 6, 2016. Three comment letters were received during the comment period, as listed below.

#### Agency Comments

- *Redwood City Letter*: Steven Turner, Planning Manager, Community Development Department, dated June 6, 2016

### Public Comments

- *Dooley Email*: Ellyn Dooley, dated May 16, 2016
- *Crabbe Letter*: David Crabbe, dated May 31, 2016

### Verbal Comments

Verbal comments from the public and Commissioners were received at a Transportation and Circulation Commission hearing on May 17, 2016, and a Planning Commission Study Session on May 31, 2016. Comments were responded to verbally during the meetings as reflected in the minutes for those meetings and/or in a separate questions and answers document.

One commenter, Paul Maggini, submitted a packet of materials. These materials consisted of excerpted pages from the Final Removal Action Workplan in place at the site (discussed on page 33 of the IS/MND), the staff report for the May 31 Planning Commission meeting, a radio station playlist, and a garden supply invoice. There were no comments included in the submitted materials and no new information relevant to the project that was not already taken into account during preparation of the IS/MND.

The verbal comments and answers and related submitted materials are not repeated here, but were taken into account for the conclusions of this document and do not raise any issues that would require recirculation of the IS/MND or preparation of an EIR.

## **DISCUSSION OF THE AGENCY COMMENT LETTER**

### Redwood City Letter

The first comment requests consideration of cumulative growth, projects, and modeling from Redwood City in the traffic assessment. As noted in the Traffic Impact Analysis (Attachment C to the IS/MND) on page 30 under the discussion of Cumulative Traffic Conditions, coordination was performed with staff at both the City of San Carlos and Redwood City and the modeling was updated to include details from the Redwood City Downtown Precise Plan EIR and the Redwood City Traffic Impact Mitigation Fee and Schedule and accounts for cumulative growth. While the project analysis was based on the model prepared for the San Carlos General Plan, it was updated through coordination with the City of San Carlos and Redwood City and adequately accounts for cumulative area growth and improvements.

The second comment relates to Mitigation Measure Traffic-1, which requires restriction of the Industrial Road project driveway, and the potential changed impacts on the circulation system. To clarify, as shown on Figure 2 of the IS/MND, the project would include only one driveway on Industrial Road and this mitigation measure applies to the only project driveway on Industrial Road. Project access is otherwise available off of Bransten Road. With a right-out restriction on the Industrial Road driveway, project traffic heading south on Industrial Road would be anticipated to primarily use the Bransten Road driveway and turn left at the signal at Industrial Road. Any resultant queues on Bransten Road would occur on a cul-de-sac leg providing local access only and would not have the potential to interfere with other nearby intersections. Some traffic would be anticipated to use the Industrial Road driveway and make a U-turn at Bransten Road. KHA, the preparers of the Transportation Impact Assessment, considered the potential for this situation and concluded that the significance of impacts would remain unchanged from that analyzed. The intersection of Industrial Road and Bransten Road was included in the Transportation Impact Assessment as intersection 21, and the analysis includes lane geometry and assessment of this intersection. No changes are proposed as a part of this project to the lane geometry or operation of this intersection.

The comments in this letter do not identify any new significant effects of the project and the significance of identified impacts in the IS/MND remains unchanged.

## **DISCUSSION OF PUBLIC COMMENTS**

### Dooley Letter

This letter expresses a concern about project and cumulative traffic and the perceived lack of a traffic impact analysis. The contention that an analysis of traffic impacts was not performed is incorrect. A full Transportation Impact Analysis was conducted by transportation engineers at KHA. This analysis was included as Attachment C of the IS/MND and summarized on pages 44 through 50 of the IS/MND.

Under CEQA, the decision of whether to prepare an MND as opposed to an Environmental Impact Report (EIR) is whether the project would result in significant impacts that cannot be reduced through implementation of changes to the project or mitigation (CEQA Guidelines section 15070). As concluded in the IS/MND, all potentially significant impacts of the project can be reduced below levels of significance through implementation of identified mitigation, and therefore an MND was determined to be the appropriate environmental document under CEQA. The MND is the package in which the Transportation Impact Analysis and conclusions were circulated. There would have been no difference in the Transportation Impact Analysis and to be specific, to the scope of the analysis of project impacts on traffic or the conclusions of that analysis, had the environmental document been an EIR instead of an MND.

This letter also expresses a concern about a “toxic chemical pit” at the site. Contamination at the site and existing and proposed removal efforts are discussed on pages 32 through 34 of the IS/MND including Mitigation Measures Haz-1 through 3. As presented in that section, known contamination at the site includes a tar-like material that was discovered in 2008 and is believed to have occurred from historic (prior to the construction of the existing buildings) undocumented dumping of oil recycling waste by a nearby oil recycling business. In addition to the referenced pages of the IS/MND, the environmental clean-up that will occur at the site is described in further detail in the separate questions and answers document.

The comments in this letter do not identify any new significant effects of the project and the significance of identified impacts in the IS/MND remains unchanged.

### Crabbe Letter

This letter includes comments regarding availability of housing that go beyond environmental considerations. This memo is focused to environmental considerations, so to respond from that perspective, population and housing was discussed on page 41 of the IS/MND. As noted in that discussion, the San Carlos General Plan identified the potential for San Carlos to capture job growth in office space and estimated job growth in San Carlos of 8,530 jobs between 2005 and 2035, which would result in job growth and a jobs-to-housing ratio consistent with regional projections and identified a less than significant environmental impact related to population growth. Therefore, the project would not result in substantial unaccounted-for population growth and resultant likely worker trip distribution and distances would be consistent with those assumed in traffic and emissions models and the cost of or competition for housing would not result in additional environmental impacts from those analyzed in the IS/MND and consideration of additional mitigation (such as the recommended partial solutions in this letter) is not required under CEQA. As noted above, this response is from an environmental analysis perspective only and does not address the potential for economic or social considerations related to this issue.

The letter also includes a list of other concerns, many of which are not directly related to the environmental analysis. Related to the 20% trip reduction for the Transportation Demand Management

Plan (TDM), this is a regulatory requirement codified in the City's Municipal Code for office projects in San Carlos and successful attainment of this reduction is required to be demonstrated through follow-up assessment and reports. Specifics of how this reduction is achieved could be modified through the ongoing assessment/reporting of the TDM Plan, and would include consideration of the measures such as those identified in this letter.

Additional listed recommendations related to public access and environmental amenities are not related to or required to be implemented to address environmental impacts of the project.

The comments in this letter do not identify any new significant effects of the project and the significance of identified impacts in the IS/MND remains unchanged.