

**APPENDIX A  
NOTICE OF PREPARATION, NOTICE OF PREPARATION COMMENTS,  
AND SCOPING MEETING COMMENTS**

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**SAN RAFAEL**  
THE CITY WITH A MISSION

**NOTICE OF PREPARATION**

**Date of Mailing:** February 8, 2019

<b>TO:</b>	Office of Planning and Research State Clearinghouse 1400 Tenth Street, Room 212 Sacramento, CA 95814	<b>FROM:</b>	Sean Kennings, Contract Planner LAK Associates, LLC  City of San Rafael Community Development Department Attn: Sean Kennings, Contract Planner 1400 Fifth Ave San Rafael, CA 94901
	Responsible and Trustee Agencies, Utility Providers, Organizations, Neighboring Property Owners, Neighboring Occupants, and Interested Parties		

**NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND SCHEDULED SCOPING MEETING FOR THE BIOMARIN AND WHISTLESTOP/EDEN HOUSING PROJECT EIR**

The City of San Rafael (City) is preparing an Environmental Impact Report (EIR) for the BioMarin (a global biotechnology company) and Whistlestop Senior Center/Eden Housing Project (project), which consists of a proposed expansion of the BioMarin/San Rafael Corporate Center campus (750/770/790 Lindaro St and 781/791 Lincoln Ave) onto 999 3<sup>rd</sup> St and the construction of the Whistlestop/Eden Housing Healthy Aging Center and Affordable Housing project on a 3.05-acre site located at 999 3<sup>rd</sup> Street, San Rafael, California. The California Environmental Quality Act (CEQA) requires that the City conduct environmental review of the project, which has the potential to result in physical change in the environment. The City is the "Lead Agency" for the project and is the public agency with the principal responsibility for approving and carrying out the project. The City has determined that an EIR will be the required CEQA document for the project.

The City is issuing this Notice of Preparation (NOP) to invite comments on the scope and content of study for the EIR. This NOP is being sent to local agencies, nearby residents, and other interested parties. When the draft EIR is published, it will be sent to all parties who respond to this NOP or who otherwise indicate that they would like to receive a copy of the draft EIR.

**RESPONDING TO THIS NOP:** Responses to this NOP and any related questions or comments regarding the scope or content of the Draft EIR must be directed in writing to: **Sean Kennings, Contract Planner, City of San Rafael, 1400 Fifth Avenue, San Rafael, CA 94901** or by e-mail to [sean@lakassociates.com](mailto:sean@lakassociates.com)

Comments on the NOP must be received at the above mailing or e-mail address within 30 days of receipt of this notice, or **before Monday, March 11, 2019, at 5:00 PM**. Please reference the project title of **“BioMarin/Whistlestop”** in all correspondence.

Responses to this NOP should focus, specific to this project, on the potentially significant environmental effects that the project may have on the physical environment, ways in which those effects might be minimized, and potential alternatives to the project that should be addressed in the EIR. This focus aligns with the purpose of the EIR to inform the public about these aspects of the project.

**EXISTING CONDITIONS:** The 3.05-acre project site (Assessor’s Parcel Number 011-265-01) is currently vacant and paved with an asphalt surface. The site was previously used by Pacific Gas & Electric Company (PG&E) as a manufactured gas plant and has been undergoing environmental remediation. In late 2017, PG&E completed soil excavation as defined in its Remedial Action Plan (RAP) on two acres of the 3-acre project site, backfilled the excavation with clean material, restored the project site, and conducted soil vapor sampling. The project site is now paved with asphalt and monitors are in place to test groundwater. The western portion of the project site, where buildings were once located, has yet to be remediated, and BioMarin will be responsible for this second phase of remediation (site soils and soil vapor monitoring and all other remediation except groundwater for which PG&E will remain responsible).

The surrounding neighborhood is largely commercial. The existing BioMarin campus is located immediately southeast of the project site, and Whistlestop operates an active aging center in a building next to the Sonoma Marin Area Rail Transit (SMART) station about one-quarter mile east of the project site. The two main transportation arterials in the vicinity are 3<sup>rd</sup> Street and 2<sup>nd</sup> Street. Smaller collector streets such as Brooks Street and Lindaro Street intersect with these one-way arterials. The 4<sup>th</sup> Street downtown core is one block north of the project site. Residential uses are located southwest of the site.

**PROJECT DESCRIPTION:** The BioMarin portion of the project would be constructed in two phases as follows:

- **Phase I** would consist of construction of Building A, which would be located on the north side of the project site and would include 77,000 square feet of office space and 33,000 square feet of amenities for employees and visitors of the overall BioMarin campus. The 33,000 square feet of amenities would be located on the ground floor and would include lobbies, conference rooms, a fitness center, dining space, and retail space. The retail space, consisting of about 3,500 square feet, would be open to the public. Additional public use space would be an adjacent landscaped plaza (approximately 6,000 square feet) that could be an outdoor public gathering area during daytime hours.
- **Phase II** would consist of construction of Building B, which would provide 97,000 square feet of laboratory (research and development [R&D]) space in the southern portion of the project site.

Both Building A and Building B would be 69 feet (four stories) in height. Building A would have approximately 262 feet of frontage on 3<sup>rd</sup> Street and 180 feet of frontage on Lindaro Street. Building B would have approximately 244 feet of frontage on 2<sup>nd</sup> Street and 109 feet of frontage on Lindaro Street.

Whistlestop/Eden Housing would develop its building on 0.34 acre at the northeast corner of the project site. The building would provide approximately 18,000 square feet of space for a Healthy Aging Center and 67 affordable senior housing units. The building would be developed at the same time as BioMarin Building A (Phase I). The proposed 67 housing units would be leased at affordable rents to those aged 62 and over who earn less than 60 percent of the area median income. Residential amenities would include a community room, dance/exercise studio, computer center and library, and landscaped courtyards with community gardens for residents to grow vegetables and herbs. A roof deck would be provided on the northwest and southwest corners of the sixth floor.

A total of 22 surface parking spaces would be provided for the BioMarin portion of the project at the southwest corner of the site, with access from 3<sup>rd</sup> Street. Cars would enter the site from 3<sup>rd</sup> Street, travel south to the parking area, and then exit onto Brooks Street. The 12 ground-floor parking spaces provided within the Whistlestop/Eden Housing project would have ingress and egress points on Brooks Street, north of the exit point for the surface parking area. In Phase I, when only BioMarin Building A and the Whistlestop/Eden Housing project would be located on the site, a total of 78 surface parking spaces would be provided since space would be available where Building B (Phase II) is proposed.

Approvals requested for the project include a General Plan amendment to modify the maximum intensity of non-residential development and a rezoning to expand the Planned Development District boundary.

Project plans, project description and technical studies for this project can be found on the project web page at <https://www.cityofsanrafael.org/999-3rd/>

**POTENTIAL ENVIRONMENTAL EFFECTS:** The EIR will address the following potential environmental effects: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology/Soils, Hazards, Noise, Public Services, Recreation, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use, Transportation/Traffic, and Utilities. The EIR will examine project and cumulative effects and a reasonable range of alternatives to the project that may be capable of reducing or avoiding potential environmental effects that may be identified for the project. The topics of Agricultural and Forestry Resources, Mineral Resources, and Population/Housing will not be addressed in the EIR as these do not apply to the project or project site.

**SCOPING MEETING:** A scoping meeting will be held before the City of San Rafael Planning Commission on Tuesday, March 12, 2019 at 7 PM at the City Council Chambers at 1400 Fifth Avenue, San Rafael, CA. This meeting will include a brief overview of the EIR process and allow time for oral comments on the scope of the EIR.

**For More Information:** For additional information on the project or if you wish to be placed on a mailing list to receive further information as the project progresses, please contact Sean Kennings, Contract Planner, at (415) 533-2111, [sean@lakassociates.com](mailto:sean@lakassociates.com) or the mailing address above.

Date: February 8, 2019

Signature: 

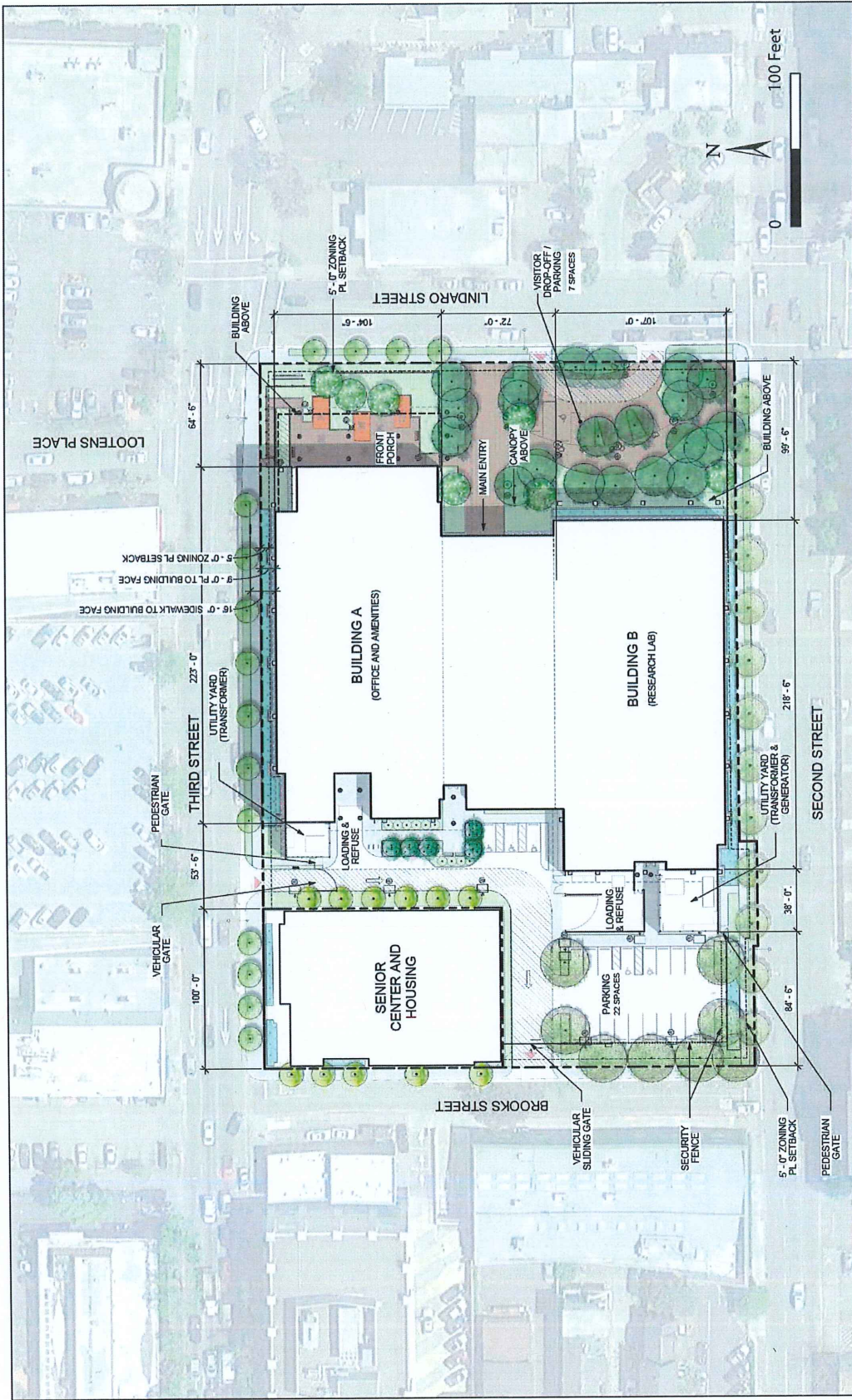
Name/Title: Raffi Boloyan, *Planning Manager*

Reference: California Code of Regulations, Title 14, (State CEQA Guidelines) Sections 15082(A), 15103, 15375

*Sign Language and interpretation and assistive listening devices may be requested by calling (415) 485-3085 (voice) or (415) 485-3198 (TDD) at least 72 hours in advance. Copies of documents are available in accessible formats upon request.*

*Public transportation to City Hall is available through Golden Gate Transit, Line 22 or 23. Para-transit is available by calling Whistlestop Wheels at (415) 454-0964.*

*To allow individuals with environmental illness or multiple chemical sensitivity to attend the meeting/hearing, individuals are requested to refrain from wearing scented products.*



**PROPOSED SITE PLAN**

SOURCE: Johnson Fain, 2018



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

**Notice of Preparation**

February 8, 2019

To: Reviewing Agencies  
Re: Biomarin and Whistlestop/Eden Housing Project  
SCH# 2019029046

Attached for your review and comment is the Notice of Preparation (NOP) for the Biomarin and Whistlestop/Eden Housing Project draft Environmental Impact Report (EIR).

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

Please direct your comments to:

**Sean Kennings  
City of San Rafael  
1400 Fifth Avenue  
San Rafael, CA 94901**

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

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

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

RECEIVED  
FEB 13 2018  
PLANNING

FEB 13 2018  
PLANNING

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2019029046  
**Project Title** Biomarin and Whistlestop/Eden Housing Project  
**Lead Agency** San Rafael, City of

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**Type** **NOP** Notice of Preparation

**Description** The BioMarin portion of the project would be constructed in two phases as follows:

- Phase I would consist of construction of Building A, which would be located on the north side of the project site and would include 77,000 sf of office space and 33,000 sf of amenities for employees and visitors of the overall BioMarin campus. The 33,000 sf of amenities for employees and visitors of the overall BioMarin campus. The 33,000 sf of amenities would be located on the ground floor and would include lobbies, conference rooms, a fitness center, dining space, and retail space. The retail space, consisting of about 3,500 sf, would be open to the public. Additional public use space would be an adjacent landscaped plaza (approx 6,000 sf) that could be an outdoor public gathering area during daytime hours.
- Phase II would consist of construction of Building B, which would provide 97,000 sf of laboratory (research and development [R&D]) space in the southern portion of the project site.

Both Building A & B would be 69 ft (4 stories) in height. Building A would have approx 262 ft of frontage on 3rd St and 180 ft of frontage on Lindaro St. Building B would have approx 244 ft of frontage on 2nd St and 109 ft of frontage on Lindaro St.

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**Lead Agency Contact**

**Name** Sean Kennings  
**Agency** City of San Rafael  
**Phone** 415 485-3095 **Fax**  
**email** sean@lakassociates.com  
**Address** 1400 Fifth Avenue  
**City** San Rafael **State** CA **Zip** 94901

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**Project Location**

**County** Marin  
**City** San Rafael  
**Region**  
**Cross Streets**  
**Lat / Long**  
**Parcel No.** 011-265-01  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use**

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**Project Issues** Aesthetic/Visual; Air Quality; Biological Resources; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Noise; Public Services; Recreation/Parks; Water Quality; Landuse; Traffic/Circulation; Other Issues

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 3; Native American Heritage Commission; Department of Housing and Community Development; Public Utilities Commission; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Air Resources Board, Transportation Projects; State Water Resources Control Board, Division of Water Quality; Department of Toxic Substances Control



<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Wildlife Region 4 Julie Vance	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Boating & Waterways Denise Peterson	<input type="checkbox"/> Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program	<input checked="" type="checkbox"/> Public Utilities Commission Supervisor	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> California Coastal Commission Allyson Hitt	<input type="checkbox"/> Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input checked="" type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Colorado River Board Elsa Contreras	<input type="checkbox"/> Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> State Lands Commission Jennifer Deleong	<input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input checked="" type="checkbox"/> Dept. of Conservation Crina Chan	<input type="checkbox"/> Dept. of Fish & Wildlife M William Paznokas Marine Region	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> Cal Fire Dan Foster	<input type="checkbox"/> Other Departments	<input type="checkbox"/> Cal State Transportation Agency CalSTA	<input type="checkbox"/> Airport & Freight Jack Wursten	<input type="checkbox"/> RWQCB 5 Central Valley Region (5)
<input type="checkbox"/> Central Valley Flood Protection Board James Herota	<input type="checkbox"/> California Department of Education Lesley Taylor	<input type="checkbox"/> Caltrans - Division of Aeronautics Philip Crimmins	<input checked="" type="checkbox"/> Transportation Projects Nesamani Kalandiyyur	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Office of Historic Preservation Ron Parsons	<input type="checkbox"/> OES (Office of Emergency Services) Monique Wilber	<input type="checkbox"/> Caltrans - Planning HQ LD-IGR Christian Bushong	<input type="checkbox"/> Industrial/Energy Projects Mike Tollstrup	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> Dept. of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Food & Agriculture Sandra Schubert Dept. of Food and Agriculture	<input type="checkbox"/> California Highway Patrol Suzann Ikeuchi Office of Special Projects	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input checked="" type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve Goldbeck	<input type="checkbox"/> Dept. of General Services Cathy Buck Environmental Services Section	<input type="checkbox"/> Dept. of Transportation	<input type="checkbox"/> State Water Resources Control Board Cindy Forbes - Asst Deputy Division of Drinking Water	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> Dept. of Water Resources Agency Nadell Gayou	<input type="checkbox"/> Housing & Comm. Dev. CEQA Coordinator Housing Policy Division	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> State Water Resources Control Board Div. Drinking Water # _____	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> Fish and Game	<input checked="" type="checkbox"/> Independent Commissions, Boards	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Quality	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> Dept. of Fish & Wildlife Scott Flint Environmental Services Division	<input type="checkbox"/> Delta Protection Commission Erik Vink	<input type="checkbox"/> Caltrans, District 3 Susan Zanchi	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Fish & Wildlife Region 1 Curt Babcock	<input type="checkbox"/> Delta Stewardship Council Anthony Navasero	<input checked="" type="checkbox"/> Caltrans, District 4 Patricia Maurice	<input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Quality	<input type="checkbox"/> Other _____
<input type="checkbox"/> Fish & Wildlife Region 1E Laurie Harnsberger	<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Caltrans, District 5 Larry Newland	<input type="checkbox"/> Dept. of Toxic Substances Control Reg. # _____ CEQA Tracking Center	<input type="checkbox"/> Conservancy _____
<input type="checkbox"/> Fish & Wildlife Region 2 Jeff Drongesen		<input type="checkbox"/> Caltrans, District 6 Michael Navarro	<input type="checkbox"/> Department of Pesticide Regulation CEQA Coordinator	
<input checked="" type="checkbox"/> Fish & Wildlife Region 3 Craig Weightman		<input type="checkbox"/> Caltrans, District 7 Dianna Watson		
		<input type="checkbox"/> Caltrans, District 8 Mark Roberts		



Submitted via electronic email: Sean Jennings (sean@lakassociates.com)

February 28, 2019

RE: Formal Request for Tribal Consultation Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code section 21080.3.1, subds. (b), (d) and (e) for the BioMarin/Whistelstop/Eden Housing Project in San Rafael, APN 011-265-01, at 999 3rd Street, San Rafael.

Dear Agency Representative:

This letter constitutes a formal request for tribal consultation under the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21080.3.1 subdivisions (b), (d) and (e) for the mitigation of potential project impacts to tribal cultural resource for a project within the Federated Indians of Graton Rancheria's ancestral lands.

Receiving this letter sets forth the Tribe's formal request for consultation on the following topics checked below, which shall be included in consultation if requested (Public Resources Code section 21080.3.2, subd. (a):

- Alternatives to the project
- Recommended mitigation measures
- Significant effects of the project

The Tribe also requests consultation on the following discretionary topics checked below (Public Resources Code section 21080.3.2, subd. (a):

- Type of environmental review necessary
- Significance of tribal cultural resources, including any regulations, policies or standards used by your agency to determine significance of tribal cultural resources
- Significance of the project's impacts on tribal cultural resources
- Project alternatives and/or appropriate measures for preservation or mitigation that we may recommend, including, but not limited to:

- (1) Avoidance and preservation of the resources in place, pursuant to Public Resources Code section 21084.3, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks or other open space, to incorporate the resources with culturally appropriate protection and management criteria;
- (2) Treating the resources with culturally appropriate dignity taking into account the tribal



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cultural values and meaning of the resources, including but not limited to the following:

- a. Protecting the cultural character and integrity of the resource;
  - b. Protection the traditional use of the resource; and
  - c. Protecting the confidentiality of the resource.
- (3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- (4) Protecting the resource.

Additionally, the Tribe would like to receive any cultural resources assessments or other assessments that have been completed on all or part of the project's potential "area of project effect" (APE), including, but not limited to:

- 1). The results of any record search(es) conducted at an archaeological information center of the California Historical Resources Information System (CHRIS), including, but not limited to:
  - (a) Any known cultural resources that have already been recorded on or adjacent to the potential APE;
  - (b) Whether the probability is low, moderate or high that cultural resources are located in the potential APE; and
  - (c) If a survey is required to determine whether previously unrecorded cultural resources are present in the potential APE.
- 2). The results of any archaeological inventory survey that was conducted of all or part of the potential APE, including, but not limited to:
  - (a) Any report that may contain site forms, site significance, and suggested mitigation measures.
- 3). The results of any Sacred Lands File searches conducted through the Native American Heritage Commission for all or part of the potential APE;
- 4). Any ethnographic studies conducted for any area including all or part of the potential APE; and
- 5) Any geotechnical reports regarding all or part of the potential APE.

We would like to remind your agency that CEQA Guidelines section 15126.4, subdivision (b)(3) states that preservation in place is the preferred manner of mitigating impacts to archaeological sites. Section 15126.4, subd. (b)(3) of the CEQA Guidelines has been interpreted by the California Court of Appeal to mean that "feasible preservation in place must be adopted to mitigate impacts to historical resources of an archaeological nature unless the lead agency determines that another form of mitigation is available and provides superior mitigation of impacts." *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal.App.4th 48,



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disapproved on other grounds, *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439.

The Tribe would like to begin consultation within 30 days of your receipt of this letter. Please contact my office at (707) 566-2288 or by email at [bmcquillen@gratonrancheria.com](mailto:bmcquillen@gratonrancheria.com) as the person who will serve as the lead contact on behalf of the Tribe.

Sincerely,

Buffy McQuillen, THPO/NAGPRA  
Federated Indians of Graton Rancheria

## Summary of Scoping Meeting Comments

BioMarin and Whistlestop/Eden Housing Project EIR

March 12, 2019

San Rafael City Council Chambers

City of San Rafael Planning Commission Public Hearing

A presentation was made on the project by Sean Kennings (Contract Planner for City of San Rafael), followed by a summary of the EIR process by Amy Skewes-Cox (EIR Project Manager). Three members of the public made comments at the hearing and these included J.R. Hastings, Bill Carney, and Matt Butler. The following comments were made:<sup>1</sup>

- 3<sup>rd</sup> Street is a speedway and there is no crossing from Walgreens to A Street
- On Brooks Street, one can't exit on either end easily; lack of visibility and both cross streets are speedways
- Concerned about sunshine/solar access for building to west; 4 floors will block sunlight and could block solar access
- Noise and air quality are concerns
- Noise could be major with pile driving
- Air quality during construction could impact office occupants nearby
- Sustainable San Rafael submitted letter, but additional concern on historic/cultural impacts associated with Whistlestop moving away from existing Tamalpais site
- In terms of transportation, the Transit Center relocation could add to cumulative impacts
- Need for workforce housing and in-lieu fee to reduce transportation demands
- Concerns on hydrology and water quality; groundwater issues at BioMarin site where property tax break may occur (as with many parcels in San Rafael); will there be a tax break for BioMarin site?

The public hearing was closed and Planning Commissioners then commented with the following concerns related to the EIR:

- Sustainable San Rafael letter responding to Notice of Preparation was very comprehensive
- Public services are important to address
- Traffic on 3<sup>rd</sup> Street and safety are concerns
- Impact on employee housing
- Potential for more workforce housing
- Confusion of LOS vs. VMT methodology
- General Plan EIR will be after the BioMarin/Whistlestop EIR
- Pedestrian safety is major concern

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<sup>1</sup> Comments are summarized.

- Effect of on-site food service and demand for travel to downtown
- Hydrology and groundwater: requirement to build above flood zone and predictions for sea level rise to address
- Traffic and pedestrian safety are big issues
- Issue of one organization (BioMarin) occupying so many buildings and what if they decide to relocate
- Issue of embodied carbon emissions (e.g., are there options such as low carbon concrete?)
- Pedestrian safety
- Possibility of café being open to the public
- Is any retail proposed?

