



## EXHIBIT D

To: Catherine Keylon  
City of Burlingame Planning Division  
501 Primrose Road  
Burlingame, CA 94010

From: Andrew Metzger  
Circlepoint  
46 South First Street  
San Jose, CA 95112  
(408) 715-1502

Subject: 1095 Rollins Road Apartments Project Response to Comments Memorandum

Date: January 3, 2020

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Dear Ms. Keylon,

The intent of this memorandum is to provide responses to comments received on the 1095 Rollins Road Project Initial Study/ Mitigated Negative Declaration (IS/MND), which was circulated for public review from October 28, 2019 to November 25, 2019. One comment letter was received. All responses are provided below by commenter and an assigned commenter number. As required pursuant to California Environmental Quality Act (CEQA) Statute and Guidelines, Section 15204, responses to comments that question the adequacy of the environmental analysis in the IS/MND are required. Based on the comment received, **Section 9, Hazards and Hazardous Materials** was revised as shown in the Errata Memorandum (**Exhibit C**).

As demonstrated by the following discussion, public comments on the draft IS/MND did not identify new environmental impacts or a substantial increase in the severity of an identified impact.

## Letter 1: Isabella Roman

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**From:** Roman, Isabella@DTSC [<mailto:Isabella.Roman@dtsc.ca.gov>]  
**Sent:** Monday, November 25, 2019 3:40 PM  
**To:** CD/PLG-Catherine Keylon <[ckeylon@burlingame.org](mailto:ckeylon@burlingame.org)>  
**Subject:** 1095 Rollins Road Apartments Project IS/ND Comment

Hello,

I represent a responsible agency reviewing the Initial Study/Proposed Negative Declaration for the 1095 Rollins Road Apartments Project.

1 | It appears that soil gas samples haven't been collected. I concur with the recommendation given in the Phase I, recommending for soil gas samples to be collected. I would suggest for soil gas samples to be collected for the Site, to eliminate any concerns about vapor intrusion.

2 | Additionally, the discussion under #9d doesn't adequately address all aspects of the question. The discussion for #9d should include a discussion of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (commonly referred to as the Cortese List). Please refer to the following link for a list of Cortese List requirements that should be reviewed as part of the CEQA process (<https://calepa.ca.gov/SiteCleanup/CorteseList/>). For DTSC, Cortese List sites are sites where DTSC has issued an order for cleanup. But this just the DTSC component of the Cortese List.

3 | In addition to conducting the full Cortese List search as noted above, Discussion #9d would also be a good place to discuss other contaminated sites nearby. The Geotracker and Envirostor databases should be searched for contaminated sites nearby the Project Site. A discussion should be provided that explains whether a nearby site has an impact on the Project Site. For example, a brief discussion is given on page 89 regarding a groundwater plume at an adjacent gas station. In discussion #9d, more information should be given regarding this gas station and any other nearby sites listed on Envirostor and/or Geotracker, and how they affect the Project Site.

Please feel free to reach out if you have any questions or concerns.

Sincerely,

Isabella Roman  
Environmental Scientist  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control  
700 Heinz Avenue Suite 200  
Berkeley, CA 94710  
(510)-540-3879

## **Response to Comment Letter 1, Isabella Roman, Department of Toxic Substances Control**

**Response to Comment 1.1:** The comment regarding soil gas sampling is noted. Although such sampling was recommended by ENGEO in the Phase I Environmental Assessment (ESA)(**Appendix I**), ENGEO ultimately decided not to conduct soil gas sampling because the Phase II ESA (**Appendix J**)soil and groundwater sampling results did not indicate any potential unacceptable vapor intrusion risk on the project site. Furthermore, the project would include a large podium underground parking structure encompassing the entire building footprint. This parking garage would be ventilated in accordance with best design practices and local building requirements. Even assuming a potential unacceptable vapor risk did exist at the project site, such risk would be avoided through construction of the building-wide ventilated parking garage. Therefore, soil gas samples would not provide further relevant information and were not collected.

**Response to Comment 1.2:** The concern regarding the adequacy of the discussion under **9d** is noted. A review of all applicable federal, state, and local databases related to hazardous material and/or cleanup listings for the project site and nearby properties was conducted as part of the Phase I ESA. As shown in the Environmental Data Resources (EDR) report included as part of the Phase I ESA, the Project site is not included on the Cortese list compiled pursuant to Government Code Section 65962.5. The discussion under **9d** has been updated to clarify this point. Please refer to the Errata Memorandum (**Exhibit C**) for the full text of these revisions.

**Response to Comment 1.3.** The suggestion regarding the discussion under **9d** is noted. As the commenter points out, potential off-site sources of contamination are discussed in the **Setting** section (page 68-69). However, the **Discussion** section is focused on contamination at the project site itself. The discussion under **9d** is intended to address the following Appendix G threshold question:

Would the project 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?

As stated in **Response to Comment 1.2** above, the discussion under **9d** has been revised to clarify that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No further discussion of neighboring properties is required under **9d**.

The discussion under **9b** addresses contamination detected during Phase II soil and groundwater sampling. Based on the Phase II testing results, neither the adjacent gas station property nor any other regulated site in the area appears to have significantly impacted the property. Therefore, a detailed discussion of nearby sites was not provided.

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