

NOTICE OF PREPARATION/INITIAL STUDY
AND COMMENTS (FOLLOWING)

APPENDIX A

to the
Alexandria Center for Life Science Project Draft EIR



NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: Alexandria Center for Life Science

A summary of the proposed project and location is included on the second page.

PURPOSE OF THIS NOTICE: This is a notification that the City of San Carlos will be the Lead Agency and will prepare a focused Environmental Impact Report for the project identified below and a request for comments on the scope and content of the environmental analysis.

An Initial Study has been prepared in accordance with the California Environmental Quality Act Guidelines Section 15063 to determine topic areas that have the potential to result in significant environmental impacts. The Initial Study determined that an Environmental Impact Report should be prepared to provide detailed analysis in the topic areas of Aesthetics, Air Quality and Greenhouse Gas Emissions, Population and Housing, Transportation, Utilities and Service Systems, and cumulative impacts factoring in other potential development in the East Side Innovation Study area.

The Initial Study determined that the project would not have significant impacts in the other CEQA topic areas, consisting of Agricultural and Forestry Resources, Biological Resources, Cultural Resources, Geology/Soils, Hazards & Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Public Services, Recreation, Tribal Cultural Resources, and Wildfire.

WHERE TO VIEW THIS DOCUMENT: The Initial Study, its supporting documentation, and details relating to the project are on-file and available for review and comment online at <https://www.cityofsancarlos.org/Home/Components/FlexPlanningZoningProjects/PlanningZoningProjects/41116/407>. If you are unable to view the document online, please contact Lisa Costa Sanders at LCostaSanders@cityofsancarlos.org or 650-802-4207 to request a hard copy of the Initial Study.

PUBLIC COMMENT INVITED: You are invited to submit written comments and recommendations regarding the analysis in the Initial Study and the scope and content of the Environmental Impact Report that is being prepared. Comments should focus on discussing possible impacts on the physical environment, ways in which potential adverse effects might be minimized, and alternatives to the project in light of the purpose of the environmental review to provide useful and accurate information about such factors. Note that if you challenge this project proposal in court, for topics addressed in the Initial Study, you may be limited to raising only those issues you or someone else raised in written correspondence during the review period of the Initial Study or at the public meeting described in this notice.

A 30-day public review period for the Initial Study shall begin on June 29, 2021 and end on July 28, 2021 at 5:00 p.m. All written comments regarding the Initial Study and scoping of the Environmental Impact Report must be received by this ending date/time.

Written comments and recommendations may be directed to Lisa Costa Sanders, Planning Division, City of San Carlos, 600 Elm Street, San Carlos, CA 94070, or email: LCostaSanders@cityofsancarlos.org by specifying "Alexandria District Project" in the subject line.

The Planning Commission will accept verbal comment on the Initial Study and the scope of the analysis to be included in the Environmental Impact Report at a meeting on July 19, 2021 starting at 7:00 p.m. Meeting details will be available on the City's website <http://sancarlosca.igm2.com/citizens/default.aspx> after 5:00 p.m. on Thursday, July 15, 2021.

COMMENT PERIOD: June 29, 2021 through 5:00 p.m. on July 28, 2021.

FOR FURTHER INFORMATION: call Lisa Costa Sanders at 650-802-4207 or e-mail: LCostaSanders@cityofsancarlos.org

PROJECT DESCRIPTION AND LOCATION: The project involves construction of an office/research and development (R&D) campus-style development on the approximately 25.34-acre site bounded by Industrial Road to the east, Commercial Street to the north, Old County Road to the west, and Pulgas Creek to the south. The site includes the following addresses: 900, 960, 961, 967 Industrial Road; 1003, 1011 Commercial Street; and 915, 1055 and 1063 Old County Road. Various existing commercial and industrial buildings would be removed and replaced with a total of approximately 1,522,508 square feet of building space (reported as usable square footage or “Gross Floor Area” as calculated per San Carlos Municipal Code section 18.03.080) in six office/R&D buildings (labeled B1 through B6 on the figure below), one centrally located community center (labeled B7), retail and bicycle amenities in the two above-grade parking structures (labeled PG1 and PG2, parking areas are otherwise not included in the usable square footage), ground-level open space for recreation and stormwater management, pedestrian and bicycle connections, landscaping, and circulation/parking elements.

Various existing commercial and industrial buildings would be removed and replaced with a total of approximately 1,522,508 square feet of building space (reported as usable square footage or “Gross Floor Area” as calculated per San Carlos Municipal Code section 18.03.080) in six office/R&D buildings (labeled B1 through B6 on the figure below), one centrally located community center (labeled B7), retail and bicycle amenities in the two above-grade parking structures (labeled PG1 and PG2, parking areas are otherwise not included in the usable square footage), ground-level open space for recreation and stormwater management, pedestrian and bicycle connections, landscaping, and circulation/parking elements. The office/R&D buildings will be at grade, five to seven stories tall, and vary in height from about 81 to 113 feet. The parking garages will each include eight levels of parking including a rooftop and a basement parking level and reach heights of 80 feet. The one-story community center would have an articulated roof reaching heights up to about 37 feet. The project would proceed in three similar sized phases starting from the west side of the site.



Alexandria Center for Life Science Illustrative Plan

INITIAL STUDY

ALEXANDRIA CENTER FOR LIFE SCIENCE PROJECT

PREPARED FOR:

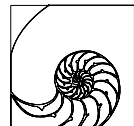
CITY OF SAN CARLOS

PLANNING DIVISION
600 ELM STREET
SAN CARLOS, CA 94070



PREPARED BY:

LAMPHIER – GREGORY
1944 EMBARCADERO
OAKLAND, CA 94606



JUNE 2021

TABLE OF CONTENTS

page

Introduction to this Document	1
Public Review	1
Project Information	2
Lead Agency Determination	14
Initial Study Checklist.....	15
Environmental Factors Potentially Affected.....	15
Evaluation of Environmental Impacts	15
Aesthetics.....	16
Agricultural and Forest Resources.....	17
Air Quality	18
Biological Resources	19
Cultural Resources	24
Energy.....	29
Geology and Soils.....	30
Greenhouse Gas Emissions.....	32
Hazards and Hazardous Materials	33
Hydrology and Water Quality.....	37
Land Use and Planning	43
Mineral Resources	44
Noise	45
Population and Housing.....	47
Public Services.....	48
Recreation	49
Transportation.....	50
Tribal Cultural Resources	51
Utilities and Service Systems	52
Wildfire.....	53
Mandatory Findings of Significance.....	54
Document Preparers.....	55
Sources.....	55

TABLES

Table 1: Project Details by Phase.....	4
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FIGURES

Figure 1: Project Location.....	5
Figure 2: Existing Conditions.....	6
Figure 3: Illustrative Site Plan and Sections.....	7
Figure 4: Massing and Site Section	8
Figure 5a: Exterior Renderings 1-4	9
Figure 5b: Exterior Renderings 2-8.....	10
Figure 5c: Exterior Renderings 9-12	11
Figure 6: Phasing Plan.....	12
Figure 7: Vehicular and Pedestrian Circulation	13
Figure 8: 100-Year Flood Extents Existing and Project Conditions	40
Figure 9: 100-Year Flood Depths Existing and Project Conditions	41

ATTACHMENTS

- Attachment A: Biological Assessment
- Attachment B: Historic Assessment
- Attachment C: Cultural Records Search, Native American Heritage Commission Response

INTRODUCTION TO THIS DOCUMENT

This document serves as the Initial Study for the Alexandria Center for Life Science project (“project”). As discussed in this document, an EIR will be prepared to address indicated topics. The EIR will also analyze cumulative conditions contemplated under the East Side Innovation District Study. Full project application materials are available for review upon request.

Note that the current applicant also controls the previously approved office/research and development project at 825-835 Industrial Road (formerly “Meridian 25”). While some of the application materials for the current project reference how the currently-proposed project would relate to the development at 825-835 Industrial Road, because the development at 825-835 Industrial Road was fully analyzed under CEQA (State Clearinghouse Number 2016052015) and previously approved, the development at 825-835 Industrial Road is not considered a part of this current project for CEQA purposes, though it is considered part of cumulative area development.

San Carlos General Plan

The San Carlos General Plan was adopted in 2009 along with certification of the associated Environmental Impact Report (EIR) (State Clearinghouse Number 2009032015).

The currently proposed project is located within the boundaries of the General Plan and related EIR, and is generally consistent with the type and intensity of development identified for this site in the General Plan and associated EIR. Accordingly, this document tiers from the General Plan EIR per California Environmental Quality Act (CEQA) Guidelines section 15152.

The General Plan EIR is incorporated into this analysis by reference and is available online at: <https://www.cityofsancarlos.org/government/departments/community-development/planning/plans-document-library/general-plan>.

PUBLIC REVIEW

This Initial Study will be circulated for a 30-day public review period. Comments may be submitted in writing by email or regular mail to the following address:

City of San Carlos
Planning Division
Lisa Costa Sanders, Principal Planner
600 Elm Street
San Carlos, CA 94070
Email: LCostaSanders@cityofsancarlos.org

PROJECT INFORMATION

All figures for the project information are included together on pages 5 through 12.

PROJECT ENTITLEMENTS

Development of the project will require the following approvals from the City of San Carlos: a Planned Development Rezoning, Planned Development Permit, Design Review Permit, Development Agreement, Lot Merger/Lot Line Adjustment (to be determined), Grading and Dirt Haul Certificate, Protected Tree Removal Permit, and Transportation Demand Management Program.

Because the project is located in the San Carlos Airport Land Use Compatibility Plan area, the project would be subject to Airport Land Use Commission review and approval.

The project is required to comply with Municipal Regional Permit requirements related to stormwater pollution prevention.

LEAD AGENCY

City of San Carlos
600 Elm Street
San Carlos, CA 94070

CONTACT PERSON

Lisa Costa Sanders, Principal Planner
City of San Carlos, Planning Division
600 Elm Street
San Carlos, CA 94070-3085
Telephone: 650.802.4207
Email: LCostaSanders@cityofsancarlos.org

PROJECT SPONSOR

Patrick Dillmann
Alexandria Real Estate Equities
c/o 1700 Owens Street #590
San Francisco, CA 94158

PROJECT LOCATION

The approximately 25.34-acre site is bounded by Industrial Road to the east, Commercial Street to the north, Old County Road to the west, and Pulgas Creek to the south. The site includes the following addresses: 900, 960, 961, 967 Industrial Road; 1003, 1011 Commercial Street; and 915, 1055 and 1063 Old County Road (Assessor's Parcel Numbers 046-162-010, -210, -270, -280, and -290; and 046-184-090, -110, -120, -280, -290, and -300). **Figure 1** shows the project location.

GENERAL PLAN DESIGNATION / ZONING

Planned Industrial / Heavy Industrial (IH)

EXISTING USES

The site currently contains containing various industrial, office, and commercial buildings totaling 542,037 square feet along with associated surface parking. **Figure 2** shows the existing site plan.

The buildings on the former Kelly Moore property were approved for removal as a separate action prior to this project and will be completed prior to construction of this project. Therefore, for purposes of this analysis, the removal of those buildings is not considered a part of the current project. This includes buildings e through o and q, r, and s (as tagged on the existing site plan included as Figure 2 on page 7) encompassing the Phase 1 area and a portion of the Phase 2 area.

SURROUNDING LAND USES

The project site is located adjacent to industrial and warehousing uses to the north, east, and south, with some office/research and development (R&D) buildings in the pipeline or under construction. The surrounding industrial uses range from one to three stories and often have setbacks from the street and large surface parking areas. The underway office/R&D developments are often more campus-like and will have underground or structured parking and open space amenities. Road and elevated train corridors are adjacent to the project to the west, providing a buffer or over 250 feet to the development on the far side of El Camino Real, which includes retail, hotel/motel, and mixed-use residential development.

The closest residential uses to the project are the 1001 Laurel Street mixed-use residential building approximately 300 feet to the west, with single family homes beyond in the direction starting about 600 feet from the project site. The Greater East San Carlos neighborhood has single family homes located as close as approximately 1,300 feet to the north of the project site.

The San Carlos Airport is located approximately 1,000 feet to the northeast of the project.

PROJECT DESCRIPTION

Buildings and Massing

The project sponsor is proposing to demolish all remaining existing buildings and to construct a new office/R&D campus with a total of 1,625,390 square feet of building space (the usable square footage or “Gross Floor Area” of which is 1,522,508 as calculated per San Carlos Municipal Code section 18.03.080), 2 above-grade parking structures (not included in the office/R&D square footage), ground level open space, pedestrian and bicycle connections, landscaping, and circulation/parking elements. An Illustrative Site Plan is include as **Figure 3**.

The proposed campus-like development includes six life science office/research & development (R&D) buildings (referred to as B1 through B6), one centrally located community center (B7), two parking garages (PG1 and PG2), and community-accessible open space and amenities, including enhancement of the Pulgas Creek corridor along the project’s southern boundary. Ground-floor retail amenities are proposed in a portion of the parking garage (PG2) fronting Commercial Street and the adjacent pedestrian walkway. The targeted tenant would be a grab-and-go food service and/or coffee shop that would primarily serve on-site uses. The office/R&D buildings will be at grade, five to seven stories tall, and vary in height from about 81 to 113 feet. The parking garages will each include eight levels of parking including a rooftop and a basement level and reach heights of 80 feet. The one-story community center would have an articulated roof reaching heights up to about 37 feet. **Figure 3** shows typical building sections to the side of the Illustrative Site Plan, **Figure 4** shows a massing model and building elevations and **Figures 5a, 5b,** and **5c** show exterior renderings. Additional detail of building massing and design will be included in the EIR and Aesthetics analysis and is available as part of the project application materials.

Phasing

The Project will be implemented in three phases as shown in **Table 1** and **Figure 6**. In addition to construction of the proposed buildings and outdoor improvements, each phase would include demolition of any remaining structures in that phase area and any adjacent roadway and creek-side improvements. The preliminary schedule estimates all phases would be completed by 2028. (Preliminary schedules are often revised as projects proceed. Note that because emissions controls become more strict over time, if the schedule is extended or pushed later, impacts would be the same or reduced from those analyzed in

this document.) Note that potential impacts and mitigation identified in this document are applicable to all phases. The analysis in the EIR will address the potential impacts by phase where appropriate.

Table 1: Project Details by Phase

Phase	Preliminary Construction Schedule	Structures	Use	Gross Floor Area ¹	Percent of Total Buildout
Phase 1	Oct 2021 - Jan 2024	B5, B6	Office / R&D	516,962	34%
		PG1	Bicycle Room	3,343	
Phase 2	Jan 2024 – April 2026	B1, B4	Office / R&D	457,509	31%
		PG2	Retail	4,500	
		B7	Community Center	7,674	
Phase 3	April 2026 – Mar 2028	B2, B3	Office / R&D	532,520	35%
Total	Oct 2021 – Mar 2028			1,522,508	100%
1 Note that Gross Floor Area for the office/R&D, retail and community center use is presented here because that is what is used for the assessment of impacts related to operations, consistent with “usable square footage” per San Carlos Municipal Code section 18.03.080. For construction activities, full gross square feet of all structures is instead used.					

Circulation Elements

Vehicular access to the site would be provided via nine driveway: two on Industrial Road, four on Commercial Street and two primary driveways and one off-road pick-up/drop-off point on Old County Road. Pedestrian connections will be provided onto and through the site including a trail along the length of Pulgas Creek. Vehicular and pedestrian circulation are shown on **Figure 7**. Circulation elements will be discussed in more detail in the EIR.

Grading

The existing site is relatively level, with general site grades ranging from approximately 10 to 17 feet above sea level, rising from Industrial Road toward Old County Road. Finished grades around the campus would be raised such that they generally range from 14 feet to 23 feet above sea level following development. The office/research buildings and parking structures will surround an amenities building and courtyard depression for stormwater detention.

Pulgas Creek

Pulgas Creek borders the site on the south side and the property lines of the project extend to approximately the center of the creek. The creek banks are approximately 6 to 7 feet high, with localized areas up to 10 feet high.

Three bridges cross Pulgas Creek within the project limits; one bridge connects the building at 1015 Commercial Street to a building directly across the creek, a second bridge is located directly northeast of the first bridge, and a third, two-lane vehicular bridge connects the paved parking area southeast of the 960 Industrial building to another parking area across the creek. No changes to the physical structures of the existing bridges are proposed, though none are proposed to be used for vehicular traffic following project construction.

The Pulgas Creek can be a source of area flooding during heavy rain events, including on and around the project site. Proposed on-site enhancements are intended to address flooding conditions for the site without worsening conditions for nearby properties. The proposed project would allow inflow of flood waters to the site in a predictable, controlled fashion via surface swales/culverts. Most of the flood water would be directed to a lowered landscape depression area near the center of the site for temporary storage until flooding conditions subside. The existing flow path would be maintained for some flood water toward the east of the site, which would allow flow to mimic existing conditions by slowing down over the surface parking in that area then flowing across Industrial Road. Flooding is discussed in more detail in Section 10: Hydrology and Water Quality.

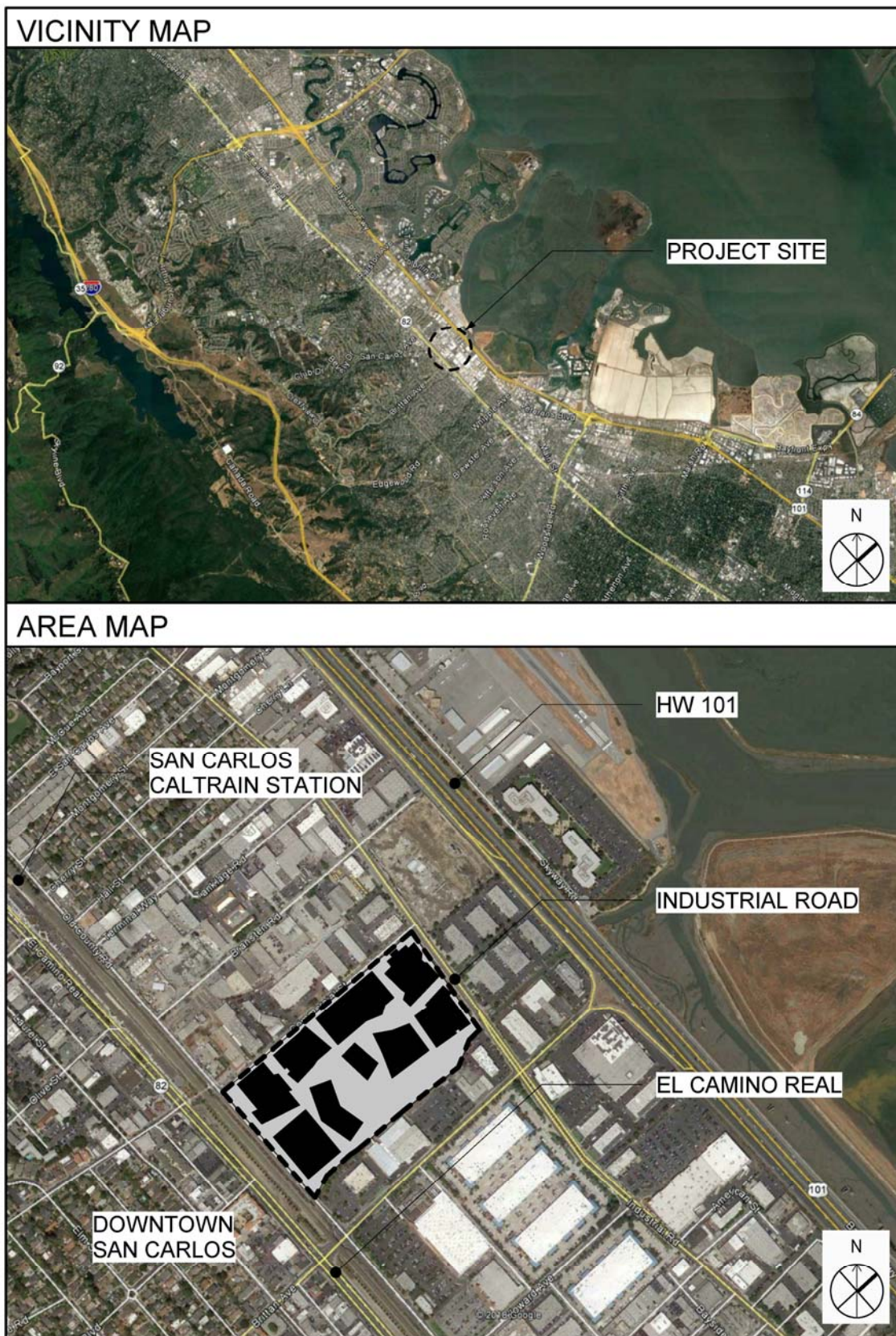


Figure 1: Project Location
Source: Project Plan Set 2/28/2021

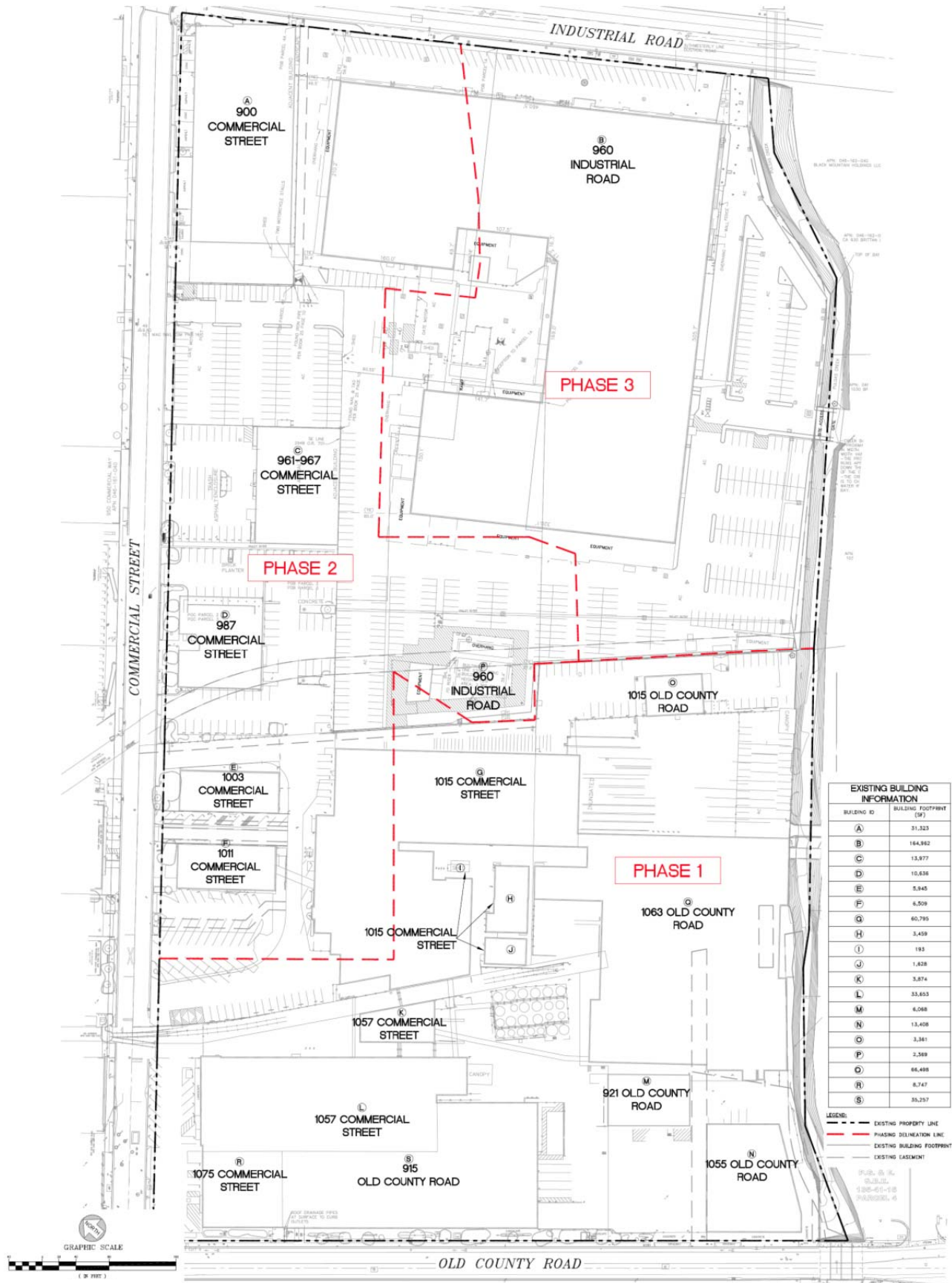


Figure 2: Existing Conditions
 Source: Project Plan Set 2/28/2021



Figure 3: Illustrative Site Plan and Sections

Source: Project Plan Set 2/28/2021

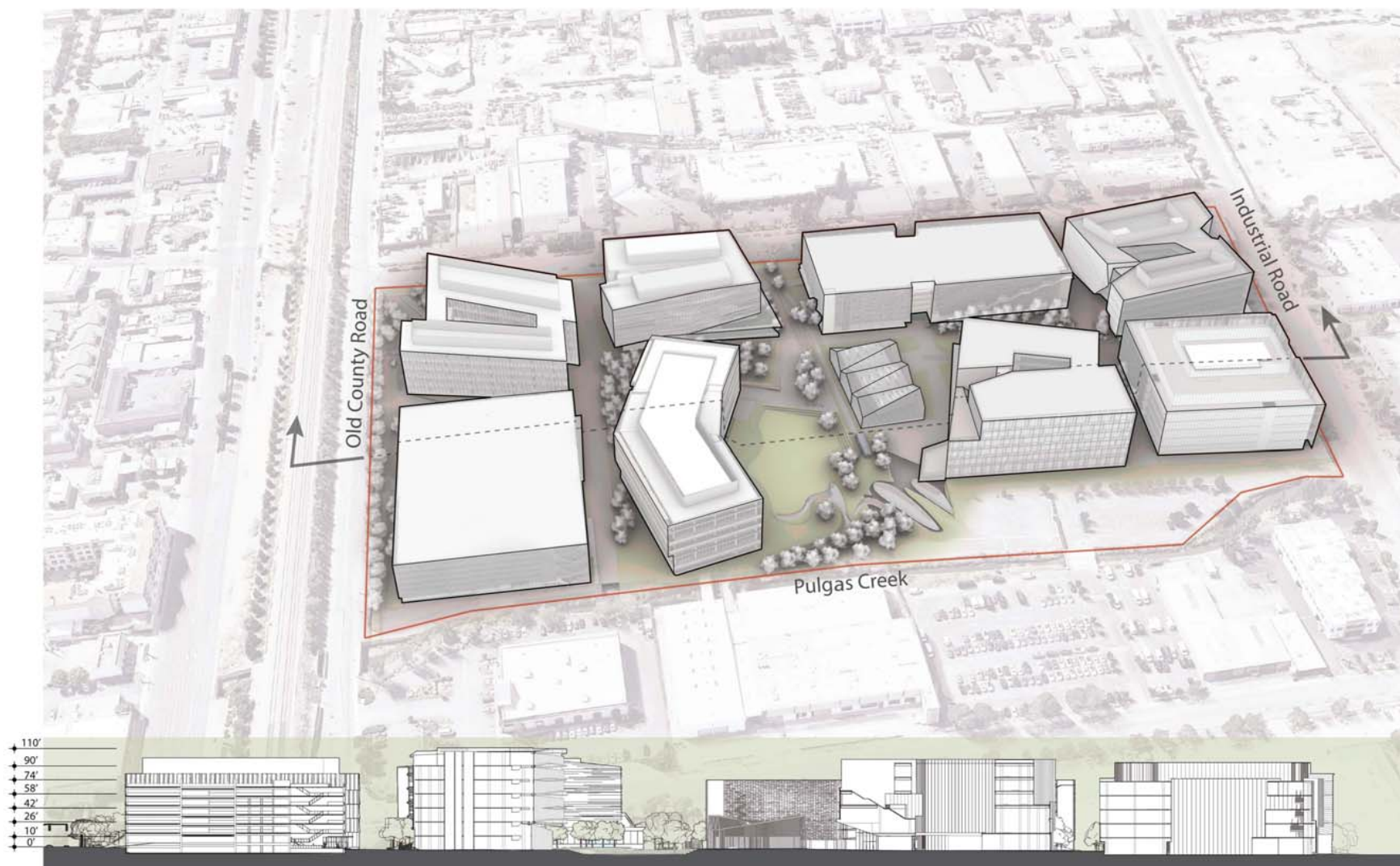


Figure 4: Massing and Site Section

Source: Project Plan Set 2/28/2021



Figure 5a: Exterior Renderings 1-4

Source: Project Plan Set 2/28/2021



8 PERSPECTIVE - COMMUNITY GREEN BUILDING 5



7 PERSPECTIVE - INNOVATION COURT PARKING GARAGE



0 ILLUSTRATIVE SITE PLAN.



6 PERSPECTIVE - COMMUNITY GREEN



5 PERSPECTIVE - KINETIC QUAD PATH

Figure 5b: Exterior Renderings 5-8

Source: Project Plan Set 2/28/2021



Figure 5c: Exterior Renderings 9-12

Source: Project Plan Set 2/28/2021



Figure 6: Phasing Plan
Source: Project Plan Set 2/28/2021



VEHICULAR CIRCULATION



PEDESTRIAN PATH

Figure 7: Vehicular and Pedestrian Circulation

Source: Project Plan Set 2/28/2021

LEAD AGENCY DETERMINATION

On the basis of this evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation measures to reduce these impacts will be required of the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature
Lisa Costa Sanders, Principal Planner

Date

INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Environmental factors that may be affected by the project are listed alphabetically below. Factors marked with an “X” (☒) were determined to be potentially affected by the project, involving at least one impact that is a potentially significant impact as indicated by the Checklist on the following pages. Unmarked factors (☐) were determined to not be significantly affected by the project, based on discussion provided in the Checklist, including the application of mitigation measures.

<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Agricultural/Forest Resources	<input checked="" type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology/Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards/Hazardous Material
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input checked="" type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input checked="" type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

An EIR will be prepared to address the indicated topics above.

EVALUATION OF ENVIRONMENTAL EFFECTS

The Checklist portion of the Initial Study begins below, with explanations of each CEQA issue topic. Four outcomes are possible, as explained below.

1. A “no impact” response indicates that no action that would have an adverse effect on the environment would occur due to the project.
2. A “less than significant” response indicates that while there may be potential for an environmental impact, there are standard procedures or regulations in place, or other features of the project as proposed, which would limit the extent of this impact to a level of “less than significant.”
3. Responses that indicate that the impact of the project would be “less than significant with mitigation” indicate that mitigation measures, identified in the subsequent discussion, will be required as a condition of project approval in order to effectively reduce potential project-related environmental effects to a level of “less than significant.”
4. A “potentially significant impact” response indicates that further analysis is required to determine the extent of the potential impact and identify any appropriate mitigation. If any topics are indicated with a “potentially significant impact,” these topics would need to be analyzed in an Environmental Impact Report.

1. AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All Topics	<input checked="" type="checkbox"/>			

Because aesthetic considerations are expected to be of interest to the public and decision-makers, the discussion of aesthetics is being deferred to the EIR, which will include more detailed discussion and numerous figures to show the proposed look of the development. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Aesthetics section will be addressed in the EIR.

2. AGRICULTURE AND FORESTRY RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) 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?				<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				<input checked="" type="checkbox"/>
c) 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))?				<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<input checked="" type="checkbox"/>
e) 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?				<input checked="" type="checkbox"/>

a-e) Agriculture and Forestry Resources. The project site is located in a developed urban area adjacent to a highway. No part of the site is zoned for or currently being used for agricultural or forestry purposes or is subject to the Williamson Act.¹ There would be ***no impact*** to agricultural and forestry resources as a result of this project.

¹ City of San Carlos, *San Carlos 2030 General Plan*, p.111.

3. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
All topics	<input checked="" type="checkbox"/>			

Air Quality topics were being analyzed during preparation of the Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Air Quality section will be addressed in the EIR.

4. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) 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 Game or U.S. Fish and Wildlife Service?		<input checked="" type="checkbox"/>		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?			<input checked="" type="checkbox"/>	
c) 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?				<input checked="" type="checkbox"/>
d) 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?				<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			<input checked="" type="checkbox"/>	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				<input checked="" type="checkbox"/>

- a) Special Status Species and Habitat. The project site consists almost entirely of developed land, with a portion of Pulgas Creek present along the southern boundary. With the exception of Pulgas Creek, which is channelized, the project site has been under industrial or commercial usage since the 1940s. It is situated within a heavily urbanized area and is surrounded on all sides by industrial, commercial, or residential uses. The developed portion of the site has little or no habitat value. Pulgas Creek is a perennial stream and the potential for biological resources and impacts was assessed by WRA in a technical report prepared for the applicant team and included as Attachment A.

Pulgas Creek flows along the entirety of the southeastern boundary of the project site, the boundary for which is located in the center of Pulgas Creek. Large sections of Pulgas Creek within the project vicinity are hardscaped, including three bridges and associated box culverts, retaining walls, and Sakrete-lined banks. The eastern section of Pulgas Creek is influenced by saltwater during tidal fluctuations, making most of the channel brackish and unsuitable for freshwater species while also not meeting the requirements of salt marsh-dependent species. The conditions of Pulgas Creek in the vicinity including channelization and culverting, tidal influence, and lack of suitable upstream habitat, make it unlikely any special-status fish species are present in this section of Pulgas Creek.

Vegetation along the banks consists of ruderal (disturbance-associated) species typical of nearshore urban creek along the margins of San Francisco Bay, including fennel (*Foeniculum vulgare*), Bermuda buttercup (*Oxalis pescaprae*), iceplant (*Carpobrotus edulis*), creeping wildrye (*Elymus triticoides*), Italian ryegrass (*Festuca perennis*), and wild radish (*Raphanus sativus*). The creek does

not support a woody riparian vegetation community. Some species occurring along the banks are wetland species typical of saline soils in the area, including saltgrass (*Distichlis spicata*) and gumplant (*Grindelia stricta*). These species are sparse and patchy, and are not present in areas containing wetland hydrology at a cover sufficient to be mapped as a wetland according to the Corps of Engineers wetland delineation procedures.

Pulgas Creek can be considered Perennial Stream habitat (0.36 acres on the project site). The project would result in a reduction in the amount of hardscape and an increase the amount of vegetated areas, thereby reducing and slowing surface run off and increasing the amount of natural water filtration compared to existing conditions. These changes would improve the quality of water contributed to Pulgas Creek by the project, as well as improve the ecological conditions in the vicinity of the creek. There is some potential that the project will require work below the top of bank to enhance vegetation along the creek, and some potential that work may be required within the active channel of Pulgas Creek. Erosion control measures such as silt fencing and straw wattles will be implemented along the length of the stream during any work adjacent to or below the top of bank. While work affecting the ruderal vegetation along the banks of Pulgas Creek may require a California Department of Fish and Wildlife permit, it is not a sensitive vegetation community and potential impacts to vegetation in this area would be considered less than significant impacts. Work within the Perennial Stream that improves ecological function of the creek would be wholly beneficial and considered to be a less than significant impact. Similarly, work within the creek that maintains existing conditions but involves placement of fill to avoid potential future adverse consequences would be considered a less than significant impact because there would be no long term adverse change to current conditions in the creek. Given the current condition of the creek, potential temporary water quality and habitat disturbance effects resulting from access to complete these beneficial improvements would also be less than significant. If project activities include work within Pulgas Creek, those activities could result in a loss of Perennial Stream area or introduction of additional unvegetated armoring along the creek bank, which is a potentially significant impact.

Mitigation Measure

Bio-1: Riparian Habitat Benefit or Replacement. If the Project completes work within Pulgas Creek, it will be designed to result in a net benefit to the ecological conditions to the extent feasible. If work within Pulgas Creek results in a loss of area within the channel or addition of new reaches of unvegetated bank armoring, these impacts will need to be mitigated for at a minimum 1:1 ratio on a functions and values basis (“no net loss”). Required mitigation can be met by creating or enhancing stream and riparian habitat onsite or off-site, purchasing wetland credits (1:1 ratio) from a mitigation bank, or other suitable method of mitigation determined appropriate by the regulatory permitting agencies.

With implementation of mitigation measure Bio-1, which requires work within the creek to be demonstrated to have a net benefit or provide replacement, the related to riparian habitat would be *less than significant with mitigation*.

Based upon a review of the resource databases and a reconnaissance visit by qualified biologists on March 13, 2020, no special-status plant or wildlife species were observed on the project site and of the special-status species that have been documented in the vicinity of the project, all of the special-status plant species and most of the special-status wildlife species are unlikely to occur or have no potential to occur on the project site because suitable conditions are lacking. Two special-status bird species have potential to occur in vegetated areas along Pulgas Creek: Alameda song sparrow (*Melospiza melodia pusillula*) and San Francisco common yellowthroat (*Geothlypis trichas sinuosa*).

The federal Migratory Bird Treaty Act and Fish and Game Code of California also protect other non-status bird species year-round, as well as their eggs and nests during the nesting season. The list of migratory birds includes almost every native bird in the United States.

Special-status and non-status nesting birds have the potential to nest in trees, shrubs, herbaceous vegetation, and on bare ground and man-made structures within and adjacent to the project site. Project construction activities have the potential to impact nests in these areas if construction is initiated during the breeding bird season (February 1 through August 31). Potential impacts include direct destruction of nests as well as indirect visual and acoustic disturbance to nesting birds from construction in adjacent areas that has the potential to result in nest abandonment.

The project would result in the loss of a small amount of suitable nesting habitat. However, based on extensive development within and adjacent to the project site, the area of lost potential nesting habitat is considered a less than significant impact.

If the project would result in substantial increased risk of bird collisions, this could be considered a “take” in certain circumstances under state-wide regulations and potentially an impact under CEQA. An Avian Collision Risk study was prepared by H.T. Harvey and Associates for the applicant in August 2020 and is available as part of the project application. A number of factors play a role in determining the risk of bird collisions with buildings, including the amount and type of glass used (which can attract birds by reflecting sky and landscaping or be seen as a clear path through corners or to indoor landscaping), lighting, properties of the building (e.g., size, design, and orientation), type and location of vegetation around the building, and building location. The Avian Collision Risk study noted that due to the highly urbanized area in which the project is located, there are a relatively low number of birds traversing the project site. The study also considered the design features of the project and determined that the following proposed design details would reduce the potential for avian collisions:

- Predominantly opaque parking garage facades with only limited use of glazing.
- Low-reflectivity glazing (<15% reflectance) on all buildings.
- Features on all of the buildings that reduce the extent of transparent glazing that can be seen as a clear path, including opaque wall panels, screens, spandrel glazing, and perforated metal panels.
- Features on all of the buildings that help the buildings appear as solid structures from a distance such as mullions, shadow boxes, fins, and overhangs are present.
- Walled service areas adjacent to several of the buildings that separate landscape vegetation and trees from glazed facades.
- Minimal vegetation that could act as an attractant to birds along potentially dangerous flight paths including in between most buildings and adjacent to transparent glass corners. (This item included coordination to more or remove select trees from the original landscape plan.)

The risk of avian collision is already relatively low due to the site location and would be further minimized through the design details discussed above. The project would not have a significant impact with respect to avian collision.

Destruction of nests or indirect disturbance from construction that results in nest abandonment are considered potentially significant impacts.

Mitigation Measure

Bio-2: Pre-Construction Nesting Bird Survey. Initiation of construction activities during the avian nesting season (February 1 through August 31) will be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction nesting bird surveys will be conducted within 14 days of initial ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys can be used to detect the nests of special-status as well as non-special-status birds. Surveys will encompass the entire construction area and the surrounding 100 feet. An exclusion zone where no construction would be allowed will be established around any active nests of any protected avian species found in the Project Area until a qualified biologist has determined that all young have fledged and are independent of the nest. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and will be at the discretion of the biologist and, if necessary the California Department of Fish and Wildlife. These surveys would remain valid as long as construction activity is consistently occurring in a given area and will be completed again if there is a lapse in construction activities of more than 14 consecutive days during the breeding bird season.

With implementation of mitigation measure Bio-2, which requires avoidance of nesting season or a nesting survey close to initiation of construction activities, the impact related to special-status and non-status bird species would be *less than significant with mitigation*.

As detailed above and in Attachment A, there are no additional potentially-significant impacts with respect to special status species or their habitat.

- c) Wetlands and Other Areas Regulated by the Clean Water Act. The project site contains 0.36 acres of Perennial Stream (Pulgas Creek), which are potentially regulated by state and/or federal law including under Section 404 of the Clean Water Act. If project activities include work within Pulgas Creek, those activities could result in a loss of Perennial Stream area or introduction of additional unvegetated armoring along the creek bank, which is a potentially significant impact. With the implementation of Mitigation Measure Bio-1 (see above), potential impacts to the Perennial Stream would be reduced to a less than significant level.
- d) Wildlife Corridors. Movement and migratory corridors are segments of land that provide a link between core habitat areas. The majority of the project site is developed and is within a densely developed urban area. Pulgas Creek has limited vegetative cover and is disturbed and culverted in many sections. Pulgas Creek may facilitate movement of local wildlife adapted to high levels of anthropogenic disturbance, but does not provide a connection between areas of core habitat in natural areas. There is no impact to movement or migratory corridors resulting from the project because no movement or migratory corridors are present on the site. The project would have no impact on wildlife corridors.
- e, f) Local Policies and Ordinances and Conservation Plans. There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that covers the project site. The project would have a significant environmental impact if it were to conflict with any local policies or ordinances protecting biological resources.

The project may involve ground-disturbance within or near Pulgas Creek. Under the City of San Carlos Municipal Code, Chapter 18.14, such activity within Pulgas Creek or within 25 feet of the top of bank of Pulgas Creek will require a use/grading permit from the City. Disturbance within or near Pulgas Creek would not intrinsically be considered an environmental impact because

compliance with applicable elements of the Municipal Code will ensure consistency with applicable plans and policies and the potential for other biological impacts of such activities is analyzed above.

The San Carlos Municipal Code sets forth regulations for “protected trees” (Sections 18.18.070 and 18.41.020) which are defined as “heritage” or “significant” trees. Removal of any protected tree requires approval by the Community Development Director. In granting a tree removal permit, the Director may attach reasonable conditions to insure compliance with the content and purpose of this chapter, such as, but not limited to, requiring replacement of trees removed with plantings acceptable to the Director.

The applicant submitted arborist reports, which are included as part of the project on file at the City. A total of 92 mature trees are proposed for removal from the development portion of the project site. This includes 26 trees fitting the definition of “significant” under the City’s Municipal code. No “heritage” trees were found on the site.

An additional 24 mature trees are located outside the development area along Pulgas Creek either on or adjacent to the project site, including 7 off-site “significant trees” and 1 off-site “heritage tree”, all of which are located near the Pep Boys auto store (1087 Old County Road) on the other side of Pulgas Creek from the project site. No trees are proposed for removal within the creek area.

A total of 531 trees are proposed to be planted as part of the project.

The removal of trees at the site would not intrinsically be considered an environmental impact because the trees proposed for removal are neither endangered nor special-status from a state and federal biological standpoint, and compliance with applicable elements of the Municipal Code will ensure consistency with applicable plans and policies. The impacts related to plan and policy conflicts would be *less than significant*.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Public Resources Section 15064.5?			<input checked="" type="checkbox"/>	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Section 15064.5?		<input checked="" type="checkbox"/>		
c) Disturb any human remains, including those interred outside of formal cemeteries?		<input checked="" type="checkbox"/>		

- a) Historic Resources. A historic assessment was completed and is attached in full as Attachment B.

Some of the existing structures² at the project site were constructed prior to 45 years ago and would therefore be considered to be historic age, including the following:

- 900 Industrial Rd., a street-corner parcel with a mixed commercial-light industrial building constructed between c1954-c1958 (and with a c1993 addition).
- 960 Industrial Rd., a large parcel with an amalgamated industrial facility dating from c1955-1968 and with multiple adds (including a large 1982 addition).
- 987 Commercial St., a mid-block parcel with an office-warehouse building dating to c1965.
- 1003 Commercial St., the smallest of the five subject parcels with a c1959 light industrial building.
- 1011 Commercial St., another light industrial building that, dating to c1949, is the earliest of the five subject buildings.

The development context of the subject and adjoining blocks is strictly post-war, as development in the immediate vicinity occurred only after WWII, when fill of the Bay allowed additional development eastward from the center of San Carlos including on the project site. This post-World War II, American suburbanization and transportation boom was far-ranging throughout the region, including the towns and cities of the San Francisco Peninsula, each of which then experienced extensive new industrial, commercial, and residential development.

To be eligible for listing on the California Register (CR), a resource must be historically significant at the local, state, or national level, under one or more of four criteria discussed individually below.

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

An associated pattern of historic events that directly applies to existing development on the project site is mid-20th century military-related industrial development on the San Francisco Peninsula. In the U.S. during the combined post-World War II and Cold War period, military-industrial development surrounded and adjoined nodes of military-sponsored technological research and

² As noted in the Project Description, structures on the former Kelly Moore property were approved for demolition under a separate action and will be removed prior to initiation of this project. Therefore, for purposes of this analysis, those structures are assumed to be removed and were not included in the Historic Assessment.

development. Such nodes included major research universities, U.S. military bases, and related institutions and installations. While the pattern was national and the San Francisco Bay Area was not alone, the San Francisco Peninsula had several such nodes, including Stanford University and Mather Air Force Base, both of which spun off and supported numerous research and manufacturing ventures that commercially exploited largely military sponsored technologies. By extension, such mid-20th century industries throughout the San Francisco Peninsula were participants at the outset of commercialization of digital technologies.

This pattern of military-industrial and technological events is directly associated with most of the subject parcels. The two direct examples of such ventures on the project site include the following corporations, which developed and manufactured specific military components.

960 Industrial Road: While the Charles Litton founded company can claim historic significance for their early contribution to electron tube manufacturing, those contributions pre-date “Litton Industries” and their 960 Industrial Rd. facilities. At that same time as they established this local industrial plant, Litton Industries became a highly dispersed corporation with headquarters in Southern California.

987-1003-1011 Commercial Street: Quantic Industries, who first acquired the then existing building at 1011 Commercial St. and who thereafter expanded into 1003 Commercial before constructing 987 Commercial, developed and manufactured individual military components that were a small part of large and widely dispersed military applications. However, like Litton, Quantic was founded elsewhere prior to acquiring and expanding their Commercial Street facilities.

While the subject properties have an association to this broad historic pattern of events, their individual associations were minor. There is no evidence of any major technological contributions with direct associations to the subject parcels, and none of the existing structures would qualify as historic resources under CR criterion 1.

2. It is associated with the lives of persons important to local, California, or national history.

Historically identifiable individuals were directly associated with the origins of three of the subject properties as listed below.

900 Industrial Road: In its potential historical period of 1954-1975, the property at 900 Industrial Rd. was directly associated with one individual, the property owner Eugene A. Mignacco. The c1954 building was evidently speculatively built for real estate investment purposes, not for specific uses for or associated with Mignacco, whose career and residence was elsewhere. As there is no evidence that Mignacco has historical importance, 900 Industrial Rd. is not directly associated with any individuals of identifiable historic importance.

960 Industrial Road: In its potential historical period of c1954-1975, the property and building at 960 Industrial Rd. is not directly associated with any specific individuals. While Charles Litton founded the company and is associated with historic events, he sold his interests to Litton Industries prior to their relocation to the subject site. Additionally, Litton Industries was a large corporate entity to whom many persons were associated, so 960 Industrial Rd. is not directly associated with individuals of identifiable historic importance.

987 Commercial Street: One specific individual is directly associated with the 1968 building at 987 Commercial St., Morgan A. Gunst, Jr., one of the founders and subsequent president of Quantic Industries. While there is basic evidence that Gunst was a successful industrialist, there is no evidence that he has any historical importance.

As none of the identifiably associated persons have identifiable historic importance, none of the existing structures would qualify as historic resources under CR criterion 2.

3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

The Post WWII period in which the existing structures were constructed is discussed under Criterion 1 above, with additional details of the characteristics of each building provided below:

900 Industrial Road: The 900 Industrial Rd. building is a utilitarian Modern design, as the building is a low, rectangular and non-descript container for light-industrial use and built in the mid-20th century. A small strip (approx. 20 ft. deep) across its front is an architectural appendage to the bulk of the industrial building, which character is minimal and which has also been added to in recent decades.

960 Industrial Road: The 960 Industrial Rd. building is a large agglomeration of industrial facilities. The overall building lacks distinction in terms of its design and construction, as there are no inventive, unique or prototypical design forms or building systems. Rather, the industrial building parts exhibit utilitarian and expeditious design and construction. The original complex has also been extensively altered and added to, including with the large and central 1982 addition that interconnects the earlier buildings.

987 Commercial Street: The 987 Commercial St. office and warehouse building is a suburban late-Modern building design, its limited architectural character focused at its front and, more specifically, within its recessed front entry space. The building is otherwise surrounded by parking and situated on a block of modest commercial and industrial development. Its standardized masonry and wood construction is of no identifiable design or construction importance. Further, as a building is of the late 1960s, thus at the very terminus of the Modern period, this commercial building completely lacks representation of its late Modern period of origin. Moreover, the character of the original building exterior is not known yet was altered post-1975, when the subsequent owner (Kelly-Moore) acquired the property. It is also evident that the extant exterior painting, signage and artwork were not original to the building but date to post-1975.

1003 Commercial Street: The 1003 Commercial St. building is a generic industrial building with no architectural character or construction interest.

1011 Commercial Street: Similar to the 987 Commercial St. building, 1011 Commercial is a two-story, commercial office-over-warehouse building. Its structure combines concrete masonry and wood frame, its nearly solid front façade the former. Building elements are limited to a tall, aluminum framed entrance and to rows of steel sash windows at each side. No extant design or construction characteristics of this building have any distinction relative to their mid-century period and style.

Relative to their mid-20th century period, each of these commercial and industrial resources have, to varying extents, Modern design characteristics. Each of these buildings lack distinction in terms of their design and construction, as there are no inventive, unique, prototypical or distinctive design forms or building systems. Rather, the largely industrial buildings exhibit utilitarian and expeditious design and construction while the more commercial buildings are generic design and construction. Additionally, each of the properties and buildings have been altered and/or added to so have accrued building chronologies that extend forward into the recent and non-historic period (less than 45 years ago).

Further, no evidence has been found to identify any original engineers, architects or designers. Several contractors are identifiable relative to 960 Industrial Rd., including William J. Moran, the builder of the 1950s structures; and Daley & Trudell Construction, the contractor for the 1968 addition. The contractor for the 987 Commercial St. building was Tanklage Construction. However, none of those contractors are identifiably important to history.

Lastly, while most of these built resources directly interrelate to their mid-20th century period of development, there is no evidence of any planning or design interrelationships. Rather, as is the case with much 20th century industrial development, the buildings and structures were expedient and utilitarian rather than planning or design oriented.

The existing structures have negligible design and material character so do not embody design or construction distinction in terms of type, period, region or methods. They are not the work of any identified architect, engineer or designer; nor are either of the identified builders identifiably important. They do not possess any artistic value (the exterior artwork at 987 Commercial St. dates to post-1945, so is not herein addressed). Therefore, none of the existing structures would qualify as historic resources under CR criterion 3.

4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The existing structures have not yielded and do not appear to have the potential to yield any important historic information beyond the present historical record. As addressed herein, the subject resources do not present any historic information specific or unique to their context, setting or locale; each of the buildings are either plain, light-industrial structures of no identifiable design or construction interest, or commercial buildings of minor interest; none of their uses are identifiable importance and there are no associated individuals of historical interest. Therefore, none of the existing structures would qualify as historic resources under CR criterion 4.

Conclusions

The attached Historical Assessment concludes that based on empirical as well as historical evidence, the designs of the existing structures are without identifiable design or construction distinction. No important persons been identified as individually associated with these individual buildings, nor are they directly associated with any events of historic significance because no individual discoveries, innovations or inventions of importance are identifiably associated. The existing structures have therefore been determined not to be significant historic resources.

Therefore, the proposed project, including demolition of existing structures at the site, would have a ***less than significant*** impact related to historic resources.

- b-c) Archaeological/Human Remains. The project site has been previously developed and is fully covered by paving and structures. There are only a few known archaeological sites in the city, however, these have been located primarily near the banks of Pulgas Creeks,³ and in the broader area and near the historic bay margins, both of which describe the project site. A records search of the Northwest Information Center (Attachment C) confirmed the lack of known resources at the site but indicated that the potential for unrecorded archeological resources and Native American resources is considered moderately high due to these site characteristics.

³ City of San Carlos, Adopted October 2009, 2030 General Plan, Land Use Element, p. 76.

There are no known human remains that would be disturbed by the proposed project. If human remains are found during construction activities at the project site, they will be handled according to Section 7050.5 of the Health and Safety Code or, if the remains are Native American, Section 5097.98 of the Public Resources Code as per CEQA Section 15064.5(d).

Given the moderately high potential for unrecorded archeological resources and Native American resources at a currently-developed site that is largely covered by asphalt and buildings, mitigation measures Culture-1, -2, and -3 shall be implemented.

Mitigation Measures

Culture-1: Further Site Assessment. Prior to ground disturbance, a qualified consultant shall conduct archival research to determine the appropriate locations for cultural or tribal cultural resource (historic/archaeological/paleontological/Native American) monitoring during removal of asphalt or concrete, fill, vegetation, or structures. Following the exposure of the original soils, a qualified consultant shall conduct a field inspection and prepare a report containing “next-step” recommendations to be implemented by the project sponsor, if the potential presence of cultural resources in certain locations is considered to be moderate or high based upon the research and field inspection of the uncovered site. Next steps could include additional exploration prior to construction, monitoring of site disturbance by a qualified professional, or no additional action other than that specified in Culture-2 and Culture-3.

Culture-2: Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that any previously unidentified cultural or tribal cultural resource (historic/archaeological/paleontological/Native American) are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.

Culture-3: Halt Construction Activity, Evaluate Remains and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that any human remains are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by the County Coroner, and appropriate action taken in coordination with the Native American Heritage Commission, in accordance with section 7050.5 of the California Health and Safety Code or, if the remains are Native American, section 5097.98 of the California Public Resources Code.

Implementation of mitigation measures Culture-1, -2, and -3 will reduce the impacts associated with possible disturbance of unidentified cultural resources (historic/ archaeological/ paleontological/ Native American) at the project site to a level of *less than significant with mitigation*.

6. ENERGY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			<input checked="" type="checkbox"/>	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			<input checked="" type="checkbox"/>	

a, b) Energy. The project would be considered to have a significant impact related to energy use if it would violate applicable federal, state and local statutes and regulations relating to energy standards and/or the need for further study if energy consumption increases resulting from the project would trigger the need or expanded off-site energy facilities.

The project would be required to comply with all standards of Title 24 of the California Code of Regulations and the new California Green Building Standards Code (CALGREEN), as applicable, aimed at the incorporation of energy-conserving design and construction and comply with the City's adopted REACH code related to energy usage. Therefore, although the project would incrementally increase energy consumption, it would not result in a significant impact related to energy use or conflict with energy plans and the impact in this regard would be *less than significant*.

7. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) 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) ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 		<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?			<input checked="" type="checkbox"/>	
c) 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?		<input checked="" type="checkbox"/>		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		<input checked="" type="checkbox"/>		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		<input checked="" type="checkbox"/>		

a, c, d) Geologic Hazards. This section utilizes information from the Geotechnical Investigation prepared for the applicants by Langan Engineering and Environmental Services, dated September 2, 2020, which is available as part of project application materials.

The major active earthquake faults in the Bay Area are the San Andreas, Monte Vista-Shannon, San Gregorio, and Hayward faults. The closest fault traces are located almost 4 miles from the project site. There are no faults traces across the site and therefore, the project has no impact related to rupture along a fault.

However, the San Francisco Bay Area is a seismically active region and the site is likely to encounter strong seismic ground shaking during the lifetime of the project, which can cause seismic-related ground failure including liquefaction depending on the characteristics of the site and development. The soil and development characteristics can also result in risks of non-seismic-related hazards, including lateral spreading and expansive soil.

The site is almost fully covered by the existing buildings and asphalt surface parking, and is known to be underlain by alluvial deposits generally consisting of clays with interbedded lenses of sands. There is high groundwater at the site, with minimum depths to groundwater as little as 1 foot below existing ground surface. Given the characteristics of the soils, the site was concluded to have the following characteristics:

- liquefaction with potential for differential settlements of 1.5 to 3.5 inches
- low potential for lateral spreading to affect the site
- low potential for cyclic densification/compaction
- moderate to very high expansion potential of existing near surface soils
- settlement caused by the weight of new site fill and buildings of up to 20 inches

The geotechnical analysis concluded that the potential geological hazards can be addressed through appropriate design and construction, which would occur as part of the design-level geotechnical recommendations and structural plans as specified in mitigation measure Geo-1.

Mitigation Measure

Geo-1: **Compliance with a design-level Geotechnical Investigation report prepared by a Registered Geotechnical Engineer and with Structural Design Plans as prepared by a Licensed Professional Engineer.** Proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.

Compliance with a design-level Geotechnical Investigation and Structural Design Plans, as required by mitigation measure **Geo-1** will reduce the potential impact of seismic hazards including liquefaction to a level of *less than significant with mitigation*.

- b) Soil Erosion. The project site is generally flat, with elevations ranging from about 9 to 11 feet above mean sea level that would be generally raised to 14 to 23 feet above sea level. The project would be subject to a National Pollution Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB). The construction contractors would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and an Erosion Control Plan. The SWPPP must describe the site, the project, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, control of post-construction sediment and erosion control measures, maintenance responsibilities, and management controls. All construction activities would be required to comply with Chapters 18 and 33 and Appendix J of the City Building Code, which regulate excavation activities, the construction of foundations and retaining walls, and grading activities, including drainage and erosion control. Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. With required implementation of a SWPPP and Erosion Control Plan to prevent erosion, sedimentation, and loss of topsoil during and following construction, the soil erosion impacts of the project would be *less than significant*.
- e) Septic Tanks. The project would not include the use of septic tanks and associated disposal facilities. Therefore, the project would have *no impact* in this regard.
- f) Unique Geologic Feature or Paleontological Resource. The site is generally flat and currently developed and there are no unique geologic features at the site. There are no known paleontological resources associated with the project site. Construction of the project involves ground disturbance and if unknown paleontological resources are encountered, there is the potential for a significant impact.

Mitigation Measure Cultural-1 would also reduce the potential impact related to unknown paleontological resources.

Compliance with the protection procedures specified in mitigation measure Cultural-1 would assure that if any previously- paleontological resources are discovered, these will be handled to ensure the impact of the project would be *less than significant* with mitigation.

8. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All Topics	<input checked="" type="checkbox"/>			

Greenhouse Gas Emissions topics were being analyzed during preparation of the Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Greenhouse Gas Emissions section will be addressed in the EIR.

9. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			<input checked="" type="checkbox"/>	
b) 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?		<input checked="" type="checkbox"/>		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			<input checked="" type="checkbox"/>	
d) 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?		<input checked="" type="checkbox"/>		
e) For a project located within 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 result in a safety hazard or excessive noise for people residing or working in the project area?			<input checked="" type="checkbox"/>	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				<input checked="" type="checkbox"/>

- a) Routine Use of Hazardous Materials. It is likely that equipment used at the site during construction activities could utilize substances considered by regulatory bodies as hazardous, such as diesel fuel and gasoline. However, all construction activities would be required to conform with Title 49 of the Code of Federal Regulations, US Department of Transportation (DOT), State of California, and local laws, ordinances and procedures.

While specific tenants have not yet been identified, office uses would involve household hazardous waste such as vehicle components and cleaners. R&D laboratories additionally are likely to handle materials considered to be biological hazards and/or chemical hazards. The San Mateo County Environmental Health Division (SMCEHD) enforces regulations pertaining to safe handling and proper storage of hazardous materials to prevent or reduce the potential for injury to health and the environment. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials.

With compliance with applicable regulations, project construction and operations are not anticipated to create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials (*less than significant*).

b, d) Hazardous Materials Site and Accidental Release.

A number of Environmental Site Assessments were prepared by Ramboll for the various properties that comprise the project site between May 2018 and April 2020 and are available as part of the project application materials. The following conclusions are informed by those documents.

The project site includes the following concerns related to hazardous materials:

987-1075 Commercial Street and 915-1063 Old County Road: Soil, Groundwater, and Soil Vapor Contamination due to Historical Industrial Operations and Hazardous Materials Storage. Multiple release incidents have been reported at the site including large quantity surface spills and leaking underground storage tanks related to Kelly-Moore products and solvents. Underground storage tanks were removed in the 1980s and 1990s including removal of surrounding impacted soil. As part of the facility closure activities overseen by the San Mateo County Department of Environmental Health in 2018, petroleum hydrocarbon (TPH) and volatile organic compounds were identified in the soil and groundwater and soil vapor concentrations exceeded commercial soil gas vapor intrusion levels for the following contaminants: chloroform, carbon tetrachloride, trichloroethene (TCE), and tetrachloroethene (PCE). Soil vapor concentrations exceeded less stringent regulatory screening criteria for benzene, ethylbenzene, 1,1,2-trichloroethane, methylene chloride, and vinyl chloride. It is possible contamination at this site has impacted groundwater and vapor at other onsite properties. The San Francisco Regional Water Quality Board (SFRWQCB) has an open case related to these issues (ID Number T0608191580) including a Removal Action Workplan (RAW) which will likely require further delineation of contamination and potentially investigation for additional contaminants including heavy metals and polychlorinated biphenyls (PCBs) which are commonly found at sites with similar historic uses. The SFRWQCB (or other agency if handed off) will need to approve the RAW, confirm that the proposed use is allowed give remediation, and approve any ongoing measures if required.

960 Industrial Road: Onsite Groundwater Impact. Groundwater beneath the site is impacted with volatile organic compounds (primarily TCE) as a result of historical site operations as a testing, production, and assembly of vacuum electronic devices facility since the mid-1950s. SFRWQCB has provided oversight to investigation and remediation efforts at the property for over 30 years with Northrop Grumman as the responsible party. Case closure is currently being pursued. The property will either need to receive case closure suitable for the proposed development or implement a workplan or other remediation actions per coordination with the regulatory agency.

960 Industrial Road: Residual Soil and Groundwater Cyanide Contamination. In relation to closure activities overseen by SMCEHD for former plating and cleaning operations in Building 5B, a Remedial Action Agreement with SMCEHD was entered into by L3 Communications. Following additional investigation, SMCDEH issued closure in November 2010 but noted that subsequent land use changes or soil or groundwater removal activities in close proximity to the site would require their review.

Potential Migration of Contamination from Off-Site Properties: Two off-site former laundromat properties located approximately 550 and 600 feet southwest of the project site have open-case status with the San Mateo County Department of Environmental Health (SMCDEH) on leaking underground storage tank databases for chlorinated solvent contamination which has the potential to have impacted groundwater at the site. If the SMCDEH investigation determines that contamination associated with off-site properties is found to have migrated onto the site, it is expected any remedial activities would be the responsibility of the designated responsible parties.

There was no indication of other significant contamination on or affecting the site and no other onsite properties are the subject of open status regulatory cases.

Mitigation Measure

Haz-1: Compliance with Removal Action Workplan and Regulatory Agency Requirements.

The applicant shall demonstrate proposed compliance with agency requirements related to known contamination in the soil, groundwater, and vapor, including the Removal Action Workplan, prior to initiation of construction activities and shall demonstrate compliance with any agency-required post-construction requirements prior to occupancy.

Additionally, because of the age of the existing buildings, there is also the possibility for hazardous material from asbestos-containing materials and lead-based paint that could be released during demolition activities. Historic flooding at the site increase the likelihood of black mold in the structures.

Mitigation Measure

Haz-2: Lead-Based Paint, Asbestos, and Mold Abatement. Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials, lead-based paint, and black mold, and that any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.

Implementation of mitigation measures Haz-1 and Haz-2 will reduce the impact related to a hazardous materials site and upset or accidents involving the release of hazardous materials into the environment to a level of *less than significant with mitigation* through compliance with the existing RAW and other agency requirements as appropriate to address contaminated site soils and groundwater and assessment/abatement of hazardous building materials.

- c) Hazardous Materials Near Schools. No schools are located within a quarter mile of the site. As discussed above, solid and groundwater contamination at the site and any hazardous materials used during construction and operations will be handled according to applicable regulations and safety standards. With compliance with existing regulations, the project would represent a *less than significant impact* relative to the potential exposure of the public including students at nearby schools to hazardous materials at the project site.
- e) Airport Hazards. The closest airport is the San Carlos Airport, a small county airport, located less than ¼ mile to the east of the project site.

According to the Airport Land Use Compatibility Plan, the project site is not within a primary flight path, but is within the traffic pattern zone. Office and R&D uses are identified as compatible uses in this zone and the site has an allowable height of 155'. Because of the location within the Airport Land Use Compatibility Plan area, the project would be subject to Airport Land Use Commission approval to receive confirmation that their proposed building footprint is compatible with height constraints and would not include elements dangerous to aircraft such as blinking lights, smoke columns, or attraction of birds. The project appears to be in conformance with the applicable rules.⁴ There are no other airports, either public or private within the vicinity of the project. There would be a *less than significant impact* related to airport hazards.

⁴ City/County Association of Governments of San Mateo County, Adopted October 2015, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*, Exhibits 4-3 and 4-4 and p. 4-26.

- f) Emergency Response Plan. The project includes access points on existing roadways and would not substantially alter traffic patterns or impair implementation of any adopted emergency response plan or emergency evacuation plan. Therefore, the project would have ***no impact*** in this regard.
- g) Wildland Fire. The project site is located in an urbanized area removed from areas typically subject to wildland fire.⁵ Therefore, the project would have ***no impact*** related to wildland fire.

⁵ City of San Carlos, *San Carlos 2030 General Plan EIR*, June 2009, p. 4.6-18.

10. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			<input checked="" type="checkbox"/>	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			<input checked="" type="checkbox"/>	
c) 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: <ul style="list-style-type: none"> i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) 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 			<input checked="" type="checkbox"/>	
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?			<input checked="" type="checkbox"/>	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			<input checked="" type="checkbox"/>	

a, e) Water Quality and Discharge

Construction Period Water Quality

Any development project that would disturb an area larger than one acre is required to obtain an NPDES General Construction Permit from the State Water Resources Control Board (SWRCB). The terms of this permit require applicants to prepare a SWPPP to demonstrate that project development would not cause any increase in sedimentation, turbidity, or hazardous material concentrations within downstream receiving waters. Design requirements and implementation measures for erosion and sedimentation controls would be set forth in the applicant's SWPPP, in accordance with SWRCB design standards, and with the City's Grading and Erosion Control Ordinance (Sections 12.08.160 through 12.08.230 of the San Carlos Municipal Code). During construction, the RWQCB would monitor implementation of the project's approved SWPPP.⁶

Water Quality During Occupancy and Operation

Federal Clean Water Act regulations require municipalities to obtain NPDES permits which outline programs and activities to control surface stormwater pollution. Municipalities, such as the City of San Carlos, must eliminate or reduce "non-point" pollution, consisting of all types of substances generated as a result of urbanization (e.g. pesticides, fertilizers, automobile fluids, sewage, litter, etc.), to the "maximum extent practicable" (as required by Clean Water Act Section 402(p)(3)(iii)). Clean Water Act Section 402(p) and USEPA regulations (40 CFR 122.26) specify a municipal program of

⁶ Construction General Permit Order 2009-0009-DWQ.

“best management practices” to control stormwater pollutants. Best Management Practices (BMP) refers to any kind of procedure or device designed to minimize the quantity of pollutants that enter the storm drain system. To comply with these regulations, each incorporated city and town in San Mateo County joined with the County of San Mateo to form the San Mateo County Water Pollution Prevention Program (SMCWPPP) in applying for a regional NPDES permit.⁷

The RWQCB adopted a Municipal Regional Permit (MRP) on October 14, 2009 as the NPDES permit for all Bay Area municipalities, which includes Provision C.3. The C.3 requirements are intended to protect water quality by minimizing pollutants in runoff, and to prevent downstream erosion by: designing the project site to minimize imperviousness, detain runoff, and infiltrate runoff where feasible; treating runoff prior to discharge from the site; ensuring runoff does not exceed pre-project peaks and durations; and maintaining treatment facilities. Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the “maximum extent practicable” standard as specified in the NPDES permit and the SMCWPPP C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

An In-Lieu Stormwater Treatment and Green Infrastructure technical memorandum was prepared by Freyer & Laureta in September 2020 to add discussion of stormwater elements as a supplement stormwater plans, all of which are available as part of the project application materials. This information was used to provide details in this analysis section.

The existing site includes 1,066,210 square feet of impervious area representing approximately 99% of the site. The proposed project would reduce the impervious surfaces to a total of 828,069 square feet, representing approximately 77% of the site, so would represent a substantial net decrease in impervious area and related improvement in amount of pervious surfaces at the site.

The project includes on-site low-impact development (LID) stormwater treatment in compliance with MRP requirements as well as a substantial increase in the amount of planted landscaping. The project LID will capture and treat runoff from 100% of the projects impervious surfaces including all hardscapes and roof area as required by the MRP. The on-site LID are bioretention planters sized to treat the contributing area of impervious surface runoff entering the planter. The bioretention planters will be served by an appropriately sized post-biotreatment pipe that discharges out to Pulgas Creek using existing stormwater outfalls. Each component of the bioretention will be in accordance with the C3 specifications including the bioretention plantings and will be implemented by project phase.

Note that the project site is currently the location of off-site stormwater treatment for stormwater impacts of the nearby 825-835 Industrial Road Project. The proposed stormwater system for the current project includes continued accommodation of the required off-site treatment for that project, as provided in bioswales along the bike path next to Commercial Street. Additionally, the project proposes to replace another 13,313 square feet of existing impervious area within the right-of-way of Commercial Street, Old County Road and Industrial Road with pervious planted landscaping that provides treatment of impervious area on those roadways.

Through compliance with post-construction requirements related to implementation of the NPDES permit C.3 requirements, including project preparation and implementation of a Stormwater Control Plan and Stormwater Facility Operation and Maintenance Plan, the long-term volume of water and water quality impacts from project operation would be *less than significant* and the project would comply with applicable water quality control regulations.

⁷ Regional Water Board, 2007, Order No. R2-2007-0027, NPDES Permit No. CAS0029921.

- b) Groundwater Recharge and Supplies. The project is located on a designated urban area within the San Mateo Plain sub-basin of the Santa Clara Valley groundwater basin. As an urban area, development can present concerns of pollutant from urban runoff into surface and groundwaters.⁸ As discussed under item a above, the project would comply with stormwater drainage requirements, including increasing permeable surfaces and including bioretention/treatment areas to address both quality and volumes of runoff. The groundwater at the site is not used by this or other vicinity projects as a water supply. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and would have a *less than significant* impact related to groundwater.
- c) Drainage Pattern Alteration. As discussed under item a, the site is currently fully developed and runoff drains primarily to Pulgas Creek. The project will reduce impervious site area and slow and treat run-off with bio-retention areas prior to discharge into the creek. While any potential changes in net change in volume of runoff from development is addressed through these project elements as discussed under item a above, the site and surrounding areas experience flooding from Pulgas Creek under existing conditions (see item d below) and changes to the grading at the site, including raising of building footprints, have the potential to result in changes to off-site drainage patterns during flooding events.

A Pulgas Creek Flooding analysis and Proposed Mitigated Project analysis were prepared by WRA for the project applicant in October and November 2020. These analyses are available as part of the project application materials and inform the discussion in this section.

Most of the project site and much of the surrounding vicinity are in a low-laying area designated by the Federal Emergency Management Agency (FEMA) as a Special Flood Hazard Area subject to flooding from Pulgas Creek. The WRA analyses used a calibrated version of the City's hydrological model (prepared for the Storm Drain Mater Plan in 2018) to determine specifics of 10-year and 100-year flooding at and around the site under existing and proposed conditions.

Under existing conditions, the inundated areas from a 100-year flood include most of the Project site, the northeast side of Industrial Road, the Brittan Avenue corridor, and along Industrial Road, with onsite maximum flood depths of just over 2.5 feet deep and offsite flood depths generally between 0.5 and 2.0 feet deep, with a few deeper isolated areas. The inundated areas from a 10-year flood are generally somewhat shallower (maximum flood depths of just under 2.5 feet deep onsite and slightly below 100-year flood levels offsite) and would affect a smaller area (44.6 acres in the vicinity as opposed to 57.5 acres in a 100-year flood), though this would continue to include most of the Project site. Note that by definition, the 100-year flood is the worse case scenario between the two and generally what is utilized for CEQA analysis. 10-year flooding information was provided by the applicant at the request of the City and is included in the above-referenced analyses, but is not further mentioned in this document as CEQA conclusions for the 100-year flood scenario would also be valid for the 10-year flood scenario.

Flood modeling informed optimization of the proposed project such that onsite flooding could be addressed without worsening conditions for offsite properties. Important project features that relate to flooding conditions at the site include raising the finish grade generally 1 to 3 feet (and more in some places) higher than existing ground across the site, adding a raised trail along the north bank of Pulgas Creek that is up to about 3 feet higher than the existing conditions in some locations, using surface swale/culvert to allow inflow and channeling of flood waters from Pulgas Creek in a controlled fashion, and providing a lowered landscape depression area near the center of the site for temporary storage until flooding conditions subside. For flood waters at the eastern portion of the site upstream

⁸ California Regional Water Quality Control Board San Francisco Bay Region, San Francisco Bay Basin Water Quality Control Plan (Basin Plan), November 2019.

of the above features, flood waters under the project would mimic existing conditions by permitting flow to overbank, slow down through the south parking lot, then flow across Industrial Road.

Figures 8 and 9 show preliminary modeling of the extent and depth respectively of existing and project conditions under the 100-year flood scenario. These figures show that in addition to being protective of proposed onsite buildings, the extent (footprint) of offsite flooding during 100-year flooding events would be similar to existing conditions. WRA concludes in their analysis that the final design would reduce the potential adverse offsite impacts for the 100-year and 10-year floods to a less-than-significant level.

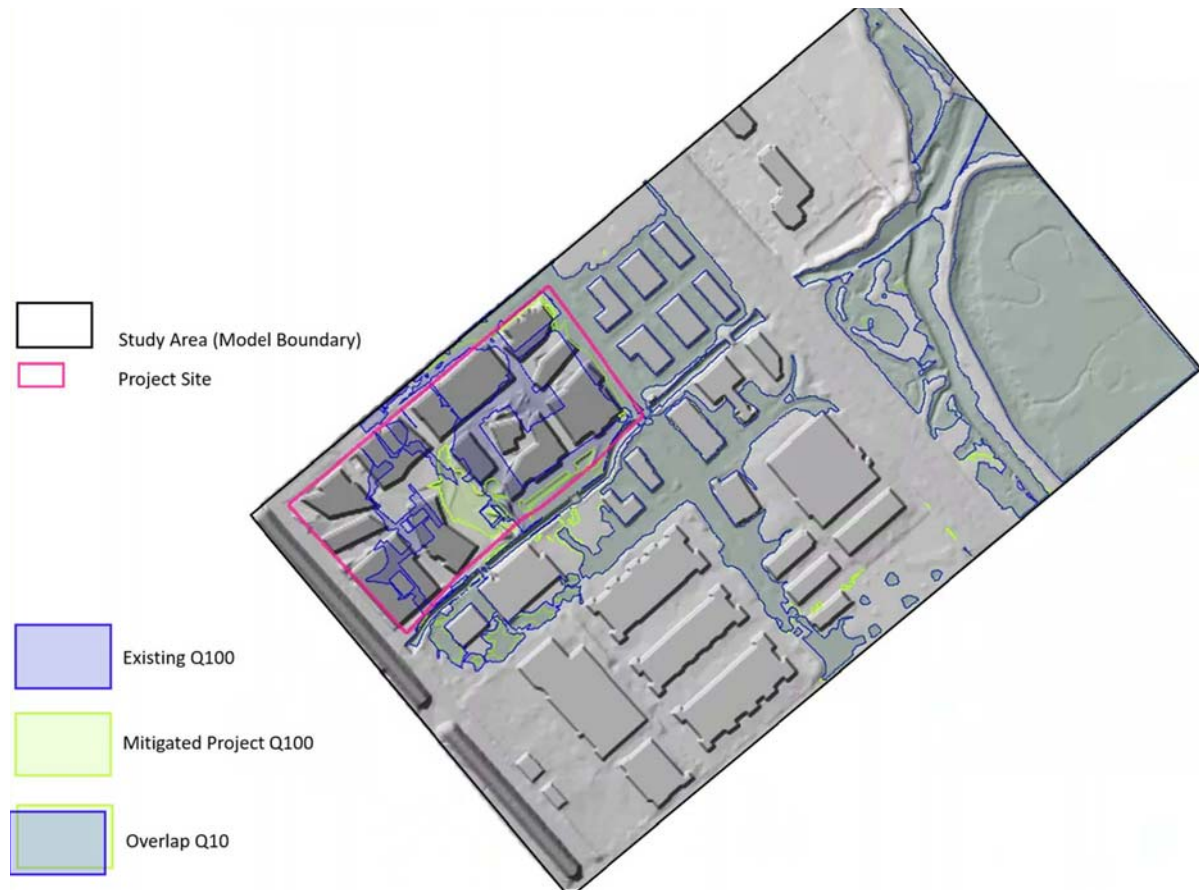


Figure 8: 100-Year Flood Extents Existing and Project Conditions

Note: The identified “mitigated project” in these figures references the currently proposed project.

Source: WRA, November 2020

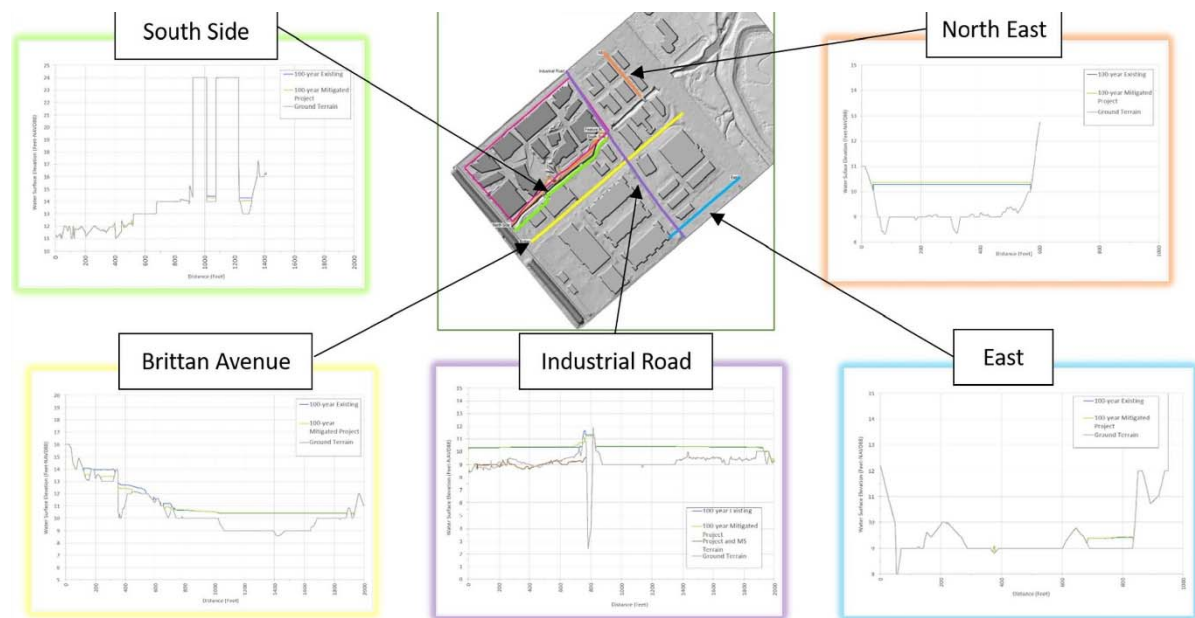


Figure 9: 100-Year Flood Depths Existing and Project Conditions

Note: The identified “mitigated project” in these figures references the currently proposed project.

Source: WRA, November 2020

As discussed above, through compliance with applicable regulations, runoff from site will be the same or reduced from that existing and will not cause erosion, siltation, pollution, or flooding. The project will alter drainage patterns, but onsite and offsite 100-year flood event conditions will be the same or improved compared to existing conditions. Project impacts related to alteration of drainage patterns would be *less than significant*.

d) Inundation.

Flooding

The majority of the project site is located within Federal Emergency Management Agency (FEMA) flood Zone AE, which is a special flood hazard area (SFHA) subject to inundation by the 1% annual chance flood.⁹ As discussed under items a and c above, the proposed project would increase pervious areas and improve drainage at the site such that proposed new onsite buildings would be protected from 100-year flooding events without worsening offsite flooding conditions. The impact with relation to flooding would be *less than significant*.

Failure of a Levee or Dam

The project site is not located within an area subject to inundation in the event of a failure of any dam.¹⁰ The project site is not located in an area that is protected by levees, other than the Pulgas Creek channel banks. As discussed under item c above, the changes to flooding conditions were analyzed for the project, which also determined that the project would be supportive of channel bed and bank stability. There would be a *less than significant impact* on the project related to dam or levee failure inundation.

⁹ Federal Emergency Management Agency (FEMA), April 2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0169G.

¹⁰ City of San Carlos, *San Carlos 2030 General Plan*, p.194.

Other Inundation

A tsunami or seiche originating in the Pacific Ocean would lose much of its energy passing through San Francisco Bay. Areas most likely to be inundated are those at or below sea level and within 1½ miles of the shoreline. The site is approximately 2¾ miles inland from the San Francisco Bay shoreline, and is approximately 9 to 11 feet above mean sea level. Relatedly, the site is mapped by the State of California Tsunami Inundation Map as not being within an inundation area.¹¹ The site elevation is also above 66 inches above mean sea level, which is the projected potential sea-level rise by 2100.¹² Additionally, the site is not located proximate to a hillside that could generate mudflow. Therefore, the potential for inundation due to tsunami, seiche, sea level rise, or mudflow would be *less than significant*.

¹¹ California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, Redwood Point/Palo Alto Quadrangle, June 15, 2009, available at http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps.

¹² California Department of Water Resources, *California Climate Science and Data for Water Resources Management*, June 2015.

11. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				<input checked="" type="checkbox"/>
b) 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?			<input checked="" type="checkbox"/>	

- a) Physical Division of a Community. The project involves redevelopment of a currently-developed site and does not involve any physical changes that would have the potential to divide an established community. The project would add public bicycle and pedestrian connections through the site and along Pulgas Creek. (***No Impact***)
- b) Conflict with Land Use Plan. An environmental impact could occur when a project conflicts with a policy or regulation intended to avoid or reduce an environmental impact. The following discussion does not replace or preclude a consistency assessment for project approval considerations, which take into account more than potential impacts to the environment.

The site is currently zoned IH (Heavy Industrial), under which R&D use is explicitly allowed and office use is allowed with a conditional use permit. The applicant is proposing approval under a Planned Development (PD) rezone, which would define development standards including intensity, height, setbacks, etc.

The potential for the project, including the requested rezoning, to have environmental impacts have been individually considered in all topic areas in this document and would not result in any significant impacts.

Therefore, the project would have a ***less than significant*** impact with regard to land use plan conflicts.

12. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				<input checked="" type="checkbox"/>
b) 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?				<input checked="" type="checkbox"/>

a, b) Mineral Resources. San Carlos, including the project site, contains no known mineral resources.¹³
The project would have ***no impact*** with regard to mineral resources.

¹³ City of San Carlos, *San Carlos 2030 General Plan*, p.111.

13. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) 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?			<input checked="" type="checkbox"/>	
b) Generation of excessive groundborne vibration or groundborne noise levels?			<input checked="" type="checkbox"/>	
c) 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?			<input checked="" type="checkbox"/>	

- a-c) Excessive Noise or Vibration. Operation of office/R&D uses does not produce substantial levels of vibration or noise. The project is not located directly within a flight path and the proposed use is compatible with anticipated noise from the airport (expected to be 60 dBA or less).

Traffic-related noise impacts generally have the potential to occur with at least a doubling of traffic volumes on roadways adjacent to areas with noise sensitive uses that are already at or above acceptable noise conditions. Because traffic noise is the primary source of ambient noise in San Carlos, these areas are generally also the ones that carry high enough volumes of traffic already that new projects do not double traffic volumes. In this case, as will be detailed further in the EIR (see section 17 Transportation), trip generation estimates for the project given proposed TDM Plan reductions are preliminarily estimated to total 1,388 trips during the PM peak hour without netting out any existing uses. As an example, approximately 32% of project traffic would be expected to travel on Industrial Road past the East San Carlos neighborhood either headed to the highway or northerly on Industrial Road. This amount to about 444 project trips. Compared to existing traffic levels reported in recent area traffic studies, traffic levels on that segment of Industrial Road total about 1,560 trips in the PM peak hour. Because net new traffic volumes would generally be below a doubling of traffic volumes in noise-impacted areas, the project would therefore not result in traffic-related noise impacts.

Standard construction practices and hours are assumed, consistent with City regulations. Impacts from noise and vibration generated by construction of the project would be *less than significant*.

Informational Item: Noise Compatibility

While not an impact of the project on the environment under CEQA, the following information related to the appropriateness of the noise environment for the proposed project is provided for informational purposes:

The General Plan indicates that for “Office Buildings, Business, Commercial and Professional” noise levels below 70 dBA are generally acceptable and noise levels between 70 to 80 dBA are conditionally acceptable, whereas higher noise levels may result in a project unable to comply with

noise element policies.¹⁴ (“dBA” is the A-weighted decibel level, which gives greater weight to sounds to which the human ear is sensitive and is a standard measure of noise affecting humans.)

Roadway noise, specifically from U.S. 101 highway traffic and traffic along Industrial Road, is the greater noise source at the site. Based on modeling for the General Plan, noise levels at the site would generally be between 60 to 70 dBA, with frontages along Industrial Road and Old County Road reaching up to about 75dBA. Construction of modern office/R&D buildings are generally protective of interior noise levels for future uses, but the City may desire to have the applicant provide project-specific acoustical assessment of the site and specific construction standards of the proposed building to demonstrate appropriateness of noise levels for the proposed uses.

¹⁴ City of San Carlos, *San Carlos 2030 General Plan*, pp. 231, 236, and 238.

14. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) 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)?	<input checked="" type="checkbox"/>			
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				<input checked="" type="checkbox"/>

- a) Substantial Population Growth. While neither housing nor population are directly created as a result of this project, employment opportunities can indirectly increase population and the demand for housing.

Employee estimates, including cumulative growth in San Carlos, were being analyzed during preparation of the Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. This topic will be addressed in the EIR.

- b) Displacement of Housing or People. There is currently no housing or people at the site that would be displaced by the project. The project would have ***no impact*** related to displacement of housing or people.

15. 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 following public services?	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Fire protection			<input checked="" type="checkbox"/>	
b) Police protection			<input checked="" type="checkbox"/>	
c) Schools			<input checked="" type="checkbox"/>	
d) Parks			<input checked="" type="checkbox"/>	
e) Other public facilities			<input checked="" type="checkbox"/>	

a-e) Public Services. The proposed project is located on a developed site within San Carlos that is already served by public services. The project would not directly add population, and an office/R&D use would not be anticipated to substantially increase utilization of public services, such that it would have the potential to cause significant environmental impacts. The minimal increases in demand for services expected with the worker population and potential indirect population growth (see section 13), would be offset through payment of development fees and annual taxes, a portion of which go toward ongoing provision of and improvements to public services. Therefore, the impact to public services would be *less than significant*.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) 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.			<input checked="" type="checkbox"/>	
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.			<input checked="" type="checkbox"/>	

a-b) Recreation. The project proposes onsite open space in the form of publically-accessible pedestrian and bicycle pathways and open spaces. The construction of onsite amenities has been included in the analysis in this document and would not result in significant impacts to the environment. The project would not otherwise construct or be expected to substantially increase the use of public recreational facilities. Therefore, the impact related to recreation would be *less than significant*.

17. TRANSPORTATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	<input checked="" type="checkbox"/>			

Transportation topics were being analyzed during preparation of the Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Transportation section will be addressed in the EIR.

18. TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) 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: i) 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), or ii) 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		☒		

- a) **Tribal Cultural Resources.** The project area is previously disturbed, and a search of the Sacred Lands File (included in Attachment C) did not identify any Sacred Lands that could be impacted by the project.

As discussed in more detail under the Cultural Resources section, the project location is previously disturbed and a records search performed by the Northwest Information Center (included as Attachment C) confirmed there are no known Native American resources on the site and the potential for unrecorded resources is considered low. Construction of the project involves ground disturbance and if unknown tribal cultural resources or human remains are encountered, there is the potential for a significant impact.

Mitigation Measure Cultural-1 would also reduce the potential impact related to unknown tribal cultural resources.

Compliance with the protection procedures specified in mitigation measure Cultural-1 would assure that if any previously-unknown tribal cultural resources and/or human remains are discovered, these will be handled appropriately and the impact of the project would be *less than significant* with mitigation.

19. UTILITIES AND SERVICE SYSTEMS Would the project	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	<input checked="" type="checkbox"/>			

Utilities and Service Systems topics were being analyzed during preparation of the Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Utilities and Service Systems section will be addressed in the EIR.

20. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				<input checked="" type="checkbox"/>
b) 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?				<input checked="" type="checkbox"/>
c) 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?				<input checked="" type="checkbox"/>
d) 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?				<input checked="" type="checkbox"/>

a-d) Wildfire Risk and Emergency Response. The project site are within the developed urban area of San Carlos, which has not been identified as a very high fire hazard severity zone.¹⁵ The proposed project would have ***no impact*** related to wildfire.

¹⁵ Department of Forestry and Fire Protection Fire and Resource Assessment Program, *San Mateo County Very High Fire Hazard Severity Zones*, November 24, 2008, available at: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf.

21. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	<input checked="" type="checkbox"/>			

As indicated throughout this document, there are various environmental topics that will be addressed in an EIR to be prepared subsequently. Because this section relies on conclusions from all topics, it will also be addressed in the EIR.

DOCUMENT PREPARERS

Lamphier – Gregory, Inc.

(Primary Report Preparers)

Rebecca Auld, Senior Planner

4100 Redwood Road, STE 20A - #601

Oakland, CA 94619

510-535-6690

City of San Carlos

This document was prepared in consultation with City of San Carlos staff, Lisa Costa-Sanders, Principal Planner.

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ATTACHMENT A:
BIOLOGICAL ASSESSMENT

ATTACHMENT TO THE
JUNE 2021
ALEXANDRIA DISTRICT FOR SCIENCE AND TECHNOLOGY PROJECT
INITIAL STUDY



Alexandria District Phase Two Biological Letter Report for CEQA Review

Prepared for:

Freyer & Laureta, Inc.

Prepared by:

Justin Semion, MBA, PWS

Scott Batiuk, BS, CCB

September 2, 2020

1.0 PURPOSE

The purpose of this report is to provide an analysis of biological resources at the Alexandria District Phase 2 (Project Area) in San Carlos, San Mateo County, California. The report will address the questions in the California Environmental Quality Act (CEQA) Environmental Checklist (Appendix G of the CEQA Guidelines) and will be suitable for use by the City of San Carlos for the Project's CEQA documentation.

2.0 BACKGROUND AND EXISTING CONDITIONS

The approximately 25-acre Project Area consists almost entirely of developed land, with a portion of Pulgas Creek present along the southeastern boundary. With the exception of Pulgas Creek, which is channelized, the Project Area has been under industrial or commercial usage since the 1940s, though many buildings on-site are currently vacant. It is situated within a heavily urbanized area and is surrounded on all sides by industrial, commercial, or residential uses. Primary site access is along Old County Road or Commercial Street.

3.0 METHODS

This evaluation is based on a review of literature and database sources as well as a site visit completed by WRA on March 13, 2020. Prior to the site visit, WRA biologists reviewed literature resources and performed database searches to assess the potential for sensitive biological communities (e.g., wetlands) and special-status species (e.g., endangered plants), including:

- SoilWeb (CSRL 2020)
- Palo Alto, Redwood Point, San Mateo, and Woodside 7.5-minute quadrangles (USGS 2018a-d)
- Contemporary aerial photographs (Google Earth 2020)
- Historical aerial photographs (NETR 2020)

- National Wetlands Inventory (USFWS 2020a)
- California Natural Diversity Database (CNDDDB, CDFW 2020a)
- California Native Plant Society Electronic Inventory (CNPS 2020a)
- Consortium of California Herbaria 2 (CCH2 2020)
- USFWS Information Planning and Consultation database (USFWS 2020b)
- eBird Online Database (eBird 2020)
- California Department of Fish and Wildlife (CDFW) Publication, California Bird Species of Special Concern in California (Shuford and Gardali 2008)
- CDFW and University of California Press publication California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- A Manual of California Vegetation, Online Edition (CNPS 2020b)
- California Natural Community List (CDFW 2019)

On March 13, 2020, WRA conducted a field assessment of the Project Area to observe conditions for presence of sensitive biological communities and potential to support habitat for special status plant and wildlife species. Potentially jurisdictional areas and sensitive habitats were mapped using a combination of mapping-grade GPS devices and hand-drawn boundaries on high-resolution aerial imagery.

4.0 RESULTS

4.1 Vegetation Communities and Other Land Cover

WRA observed two land cover types within the Project Area: developed areas and perennial stream. Developed areas are non-sensitive and the perennial stream is sensitive. Land cover types within the Project Area are depicted in Attachment A.

Developed

Developed areas comprise the vast majority of the Project Area and consist of buildings, paved and concrete areas, and landscaped areas typical of developed industrial land uses.



Perennial Stream and Associated Ruderal Vegetation

Pulgas Creek flows along the entirety of the southeastern boundary of the Project Area. The property boundary for the site is located in the center of Pulgas Creek. The stream is spanned by three existing bridges and is at the upper limit of tidal influence from San Francisco Bay. The banks of Pulgas Creek are a mixture of engineered armoring and ruderal vegetation growing on urban soil containing rubble from past development. Vegetation along the banks consists of species typical of nearshore urban creek along the margins of San Francisco Bay, including fennel (*Foeniculum vulgare*), Bermuda buttercup (*Oxalis pes-caprae*), iceplant (*Carpobrotus edulis*), creeping wildrye (*Elymus triticoides*), Italian ryegrass (*Festuca perennis*), and wild radish (*Raphanus sativus*). The creek does not support a woody riparian vegetation community. Some species occurring along the banks are wetland species typical of saline soils in the area, including saltgrass (*Distichlis spicata*) and gumplant (*Grindelia stricta*). These species were sparse and patchy, and were not present in areas containing wetland hydrology at a cover sufficient to be mapped as a wetland according to the Corps of Engineers wetland delineation procedures.



4.2 Special-status Species

4.2.1 Special-status Plant Species

Based upon a review of the resource databases listed in Section 3.0, 52 special-status plant species have been documented in the vicinity of the Project Area. All are unlikely or have no potential to occur within the Project Area because suitable conditions are lacking (e.g., edaphic [soil] conditions, topography, unique pH, associated natural communities, low levels of disturbance). Additionally, no special-status plant species were observed within the Project Area on March 13, 2020.

4.2.2 Special-status Wildlife Species

Based upon a review of the resource databases listed in Section 3.0, 43 special-status wildlife species have been documented in the vicinity of the Project Area. Of these species, most are excluded based on a lack of habitat features (e.g. tidal marsh, old growth redwood or fir forest, grassland, sandy beaches or alkaline flats, and the presence of specific host plants). Two special-status bird species have potential to occur in vegetated areas along Pulgas Creek: Alameda song sparrow (*Melospiza melodia pusillula*) and San

San Francisco (saltmarsh) common yellowthroat (*Geothlypis trichas sinuosa*). Non-status bird species protected by the Migratory Bird Treaty Act as well as by California Fish and Game Codes (CFGF) have potential to nest in vegetation or on structures within or adjacent to the Project Area.

The absence of habitat features eliminates components critical to the survival or movement of most special-status species found in the vicinity. Given the Project Area's relative proximity to sensitive habitats on the San Francisco Bay, many species documented nearby are additionally obligates to marine or tidal marsh habitats which are not present on or in the immediate vicinity of the Project Area. Large sections of Pulgas Creek within the Project Area are hardscaped, including three bridges and associated box culverts, retaining walls, and Sakrete-lined banks. The lower section of Pulgas Creek is influenced by saltwater during tidal fluctuations, making most of the channel brackish and unsuitable for freshwater species such as California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*).

The lack of expansive salt marsh habitat within the Project Area also eliminates the potential for salt marsh dependent species. Small patches of vegetation grow sporadically between the sections of concrete lined channel, but do not provide suitable cover or connectivity to occupied habitats.

Anadromous fish species such as steelhead (*Onchorhynchus mykiss*) are unlikely to occur in Pulgas Creek due to lack of suitable upstream habitat. While Pulgas Creek has not been surveyed for steelhead (Leidy et al. 2005, CEMAR 2016), much of the upstream extent of Pulgas Creek is culverted beneath developed areas and the creek is not suitable spawning habitat for steelhead. Historic surveys of Cordilleras Creek (which meets Pulgas Creek at Smith Slough) have not identified steelhead (Leidy et al. 2005), and no streams with current steelhead runs are located in the immediate surrounds (CEMAR 2016). As such, steelhead are unlikely to be present.

While Pulgas Creek within the Project Area is tidally influenced, based on a review of fish sampling surveys completed by CDFW and UC Davis researchers, as well as conditions present in Pulgas Creek within the Project Area, green sturgeon (*Acipenser medirostris*) do not have the potential to be present at any time within the Project Area. The San Francisco Bay Study (Bay Study) has been sampling since 1980 in the San Francisco Estuary to determine the impacts of freshwater outflow on fish distribution and abundance in the estuary (CDFW 2020b). The Bay Study uses a midwater trawl and an otter trawl to sample 52 stations, two of which are in the vicinity of the Project Area. An analysis of data collected by the Bay Study (midwater and otter trawls) since 2000 showed zero detections of green sturgeon at Bay Study stations 101 and 102, both of which are within 5 miles of the entrance to Pulgas Creek (CDFW 2020b). There were 2,307 combined midwater and otter trawl tows conducted at these three stations between 2000 and 2018. Additional sampling performed by the Hobbs Biogeochemistry and Fish Ecology Laboratory (Hobbs Lab) within south San Francisco Bay have detected no green sturgeon over the course of 1,669 sampling tows, and out of 78,863 individual fish captured (Lewis and Hobbs 2018). In addition, Pulgas Creek within the Project Area has substantial reaches of shallow water that are not suitable for habitation by the life stages of green sturgeon potentially present within south San Francisco Bay. The lack of detections of this species, combined with marginal habitat within the Project Area support no potential for this species to occur.

Longfin smelt (*Spirinchus thaleichthys*) adults seasonally occur within South San Francisco Bay, but are generally more concentrated in Suisun, San Pablo, and North San Francisco Bays (Moyle 2002, Merz 2013). Trawl surveys conducted by CDFW as part of the Bay Study have found longfin smelt are found in low numbers in South San Francisco Bay. Since 2008, low numbers of longfin smelt have been encountered

at these sampling stations every year between November and April, although no longfin smelt of any life stage have been encountered at these stations since March 2015. There is evidence that longfin smelt tend to remain in deeper channels and sloughs and fish captured by midwater trawl vs. otter trawl sampling as part of the IEP Bay Sampling Program suggested that longfin smelt downstream of San Pablo Bay prefer to be lower in the water column in deeper waters (Baxter 2009, Rosenfeld and Baxter 2007). This is consistent with this species' documented aversion to high temperatures above 22°C may limit longfin smelt (Rosenfeld and Baxter 2007, CDFG 2009). The shallow and exposed water observed within the urbanized Pulgas Creek provides little habitat value for this species. Light flow and limited tidal influence in the section of creek within the Project Area likely result in higher temperatures than adjacent waters in the Bay, making habitat less suitable for this species in general. Based on the conditions present in the Project Area, it is unlikely that longfin smelt are present.

Pulgas Creek is not mapped as Essential Fish Habitat for any managed species by NOAA (NOAA 2020).

5.0 PROJECT DESCRIPTION

The proposed project will be known as the Alexandria District for Life Science and Technology at San Carlos, which is an open campus environment featuring six life science office buildings, one centrally located community center, two parking garages, and green spaces and amenities for the community. The site will be organized by Urban and Landscape Strands, which weave urban and natural elements throughout. The Project will be implemented in three phases, with all phases expected to be completed by 2028. The Project includes a trail along Pulgas Creek, located above the top of bank. The trail and Project activities will be sited to avoid impacts to Pulgas Creek. There is some potential that vegetation enhancement or creek stabilization activities could occur below the top of bank within Pulgas Creek. The outcome of the CEQA and project planning processes for other environmental quality resource categories may determine whether or not work will occur below the top of bank. The impacts evaluation below accounts for this potential work below the top of bank as required by CEQA, despite the possibility that no work below the top of bank will occur.

6.0 ANALYTICAL METHODOLOGY AND SIGNIFICANCE THRESHOLD CRITERIA

Pursuant to Appendix G, Section IV of the State CEQA Guidelines, a project would have a significant impact on biological resources if it would:

- a) 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 Game or U.S. Fish and Wildlife Service;
- b) 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 California Department of Fish and Game or U.S. Fish and Wildlife Service;
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- d) 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;

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or,
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

These thresholds were utilized in completing the analysis of potential project impacts for CEQA purposes. For the purposes of this analysis, a “substantial adverse effect” is generally interpreted to mean that a potential impact could directly or indirectly affect the resiliency or presence of a local biological community or species population. Potential impacts to natural processes that support biological communities and special-status species populations that can produce similar effects are also considered potentially significant. Impacts to individuals of a species or small areas of existing biological communities may be considered less than significant if those impacts are speculative, beneficial, de minimis, and/or would not affect the resiliency of a local population.

7.0 IMPACTS AND MITIGATION

The purpose of this impact assessment is to evaluate the potential impacts of Project construction and operation on existing conditions for biological resources based on the significance thresholds and methodology discussed above in Section 6.0. This section is structured to specifically address each significance threshold for biological resources from CEQA Appendix G. Each section addresses a specific question posed by Appendix G.

Specific impacts and a discussion of avoidance, minimization and mitigation are discussed below. For each subsection, potential significant impacts are first identified and discussed. Then, the approach for mitigation to compensate for those impacts is discussed. Finally, a significance conclusion is provided for each potential impact. A summary of Impacts and Mitigation is presented in Table 1 below.

Table 1. Summary of Impacts and Mitigation

CEQA ASSESSMENT CATEGORY IV.-BIOLOGICAL RESOURCES	BIOLOGICAL RESOURCES CONSIDERED	POTENTIALLY SIGNIFICANT IMPACT	SUMMARY OF MITIGATION MEASURES
Question A. Special-status species	Special-status Plants Special-status Wildlife Designated Critical Habitat	Direct impacts or indirect disturbance to special-status nesting birds and other native nesting birds protected by the CFGC by destroying active nests or causing disturbance that results in nest abandonment.	If construction activities cannot be avoided from February 1-August 31: Pre-construction surveys within 500 feet of construction area within 4 days of initial ground disturbance or vegetation removal. If nests of protected avian species are present, no-work exclusion zones around any active protected nest until all young have fledged or are independent of nest.

CEQA ASSESSMENT CATEGORY IV.-BIOLOGICAL RESOURCES	BIOLOGICAL RESOURCES CONSIDERED	POTENTIALLY SIGNIFICANT IMPACT	SUMMARY OF MITIGATION MEASURES
Question B. Sensitive natural communities & Riparian habitat	Sensitive Natural Communities Streams, Lakes, & Riparian Habitat	Activities within Pulgas Creek that result in loss of the creek Increase in unvegetated bank armoring along Pulgas Creek	Work in Pulgas Creek will result in a net benefit to ecological conditions to the extent feasible. If net benefit to ecological conditions are not feasible, mitigation at a minimum 1:1 ratio by enhancing on-site or off-site stream or riparian habitat, purchasing wetland mitigation bank credits, or other suitable regulatory-agency-approved mitigation.
Question C. State and federally protected wetlands	Wetlands Unvegetated surface waters	Same as Question B.	Same as Question B.
Question D. Fish & wildlife corridors	Essential Fish Habitat Wildlife Corridors	No impact because no movement or migratory corridors are absent.	Not applicable.
Question E. Local policies	Protected Trees Coastal zone resources Other biological protections	No impact because the Project will obtain a use and grading permit as well as a tree removal permit from the City of San Carlos.	Not applicable.
Question F. Local, state, federal conservation plans	Habitat Conservation Plans Natural Community Conservation Plans	No impact because the Project Area is not located within the plan area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Not applicable.

7.1 Impacts and Mitigation Evaluation for Special-status Species

This section analyzes the Project's potential impacts and mitigation for special-status species in reference to the significance threshold outlined in CEQA Appendix G, Part IV (a):

- a) Does the project have the potential to 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 Game or U.S. Fish and Wildlife Service?

Potential impacts and mitigation for potentially significant impacts to special-status species are discussed below.

7.1.1 Special-status Plant Species

A total of 52 special-status plant species have been documented within the vicinity of the Project Area. Of these species, all are unlikely or have no potential to occur within the Project Area. Additionally, no special-status plant species were observed within the Project Area on March 13, 2020. As such, impacts to special-status plant species would be less than significant under CEQA.

7.1.2 Special-status Wildlife Species

A total of 43 special-status wildlife species have been documented from the vicinity of the Project Area. Of these species, two were determined to have moderate or high potential to occur within the Project Area. The following sections present recommendations for future studies and/or measures to avoid or reduce impacts to these species.

Special-status and Other Birds

The following special-status avian species have potential to occur within or adjacent to the Project Area: Alameda song sparrow and saltmarsh common yellowthroat.

Special-status and non-status nesting birds protected under the CFGC have the potential to nest in trees, shrubs, herbaceous vegetation, and on bare ground and man-made structures within and adjacent to the Project Area. Project construction activities have the potential to impact nests in these areas if construction is initiated during the breeding bird season (February 1 through August 31). Potential impacts include direct destruction of nests as well as indirect visual and acoustic disturbance to nesting birds from construction in adjacent areas that has the potential to result in nest abandonment. Destruction of nests or indirect disturbance from construction that results in nest abandonment are considered **potentially significant impacts** under CEQA. The project would also result in the loss of a small amount of suitable nesting habitat. Based on extensive development within and adjacent to the Project Area, the area of lost potential nesting habitat is considered a less than significant impact.

Potential Impact BIO-1: Project construction activities have the potential to result in direct impacts or indirect disturbance to special-status nesting birds and other native nesting birds protected by the CFGC. Construction could directly destroy active nests or cause disturbance that results in nest abandonment.

To reduce potential impacts to nesting birds to a **less-than-significant** level, the following measures shall be implemented:

Mitigation Measure BIO-1: Initiation of construction activities during the avian nesting season (February 1 through August 31) will be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction nesting

bird surveys will be conducted within 14 days of initial ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys can be used to detect the nests of special-status as well as non-special-status birds. Surveys will encompass the entire construction area and the surrounding 500 feet. An exclusion zone where no construction would be allowed will be established around any active nests of any protected avian species found in the Project Area until a qualified biologist has determined that all young have fledged and are independent of the nest. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and will be at the discretion of the biologist and, if necessary CDFW. These surveys would remain valid as long as construction activity is consistently occurring in a given area and will be completed again if there is a lapse in construction activities of more than 14 consecutive days during the breeding bird season.

7.1.3 Sensitive Natural Communities Impacts and Mitigation Evaluation

This section addresses the question outlined in CEQA Appendix G, Part IV (b):

- a) Does the Project 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 California Department of Fish and Game or U.S. Fish and Wildlife Service;*

The Project Area contains 0.36 acre of Perennial Stream. Vegetation along the banks of Pulgas Creek consists of ruderal vegetation typical of disturbed and developed creek margins in urban areas along the margin of San Francisco Bay. The creek does not support a woody riparian vegetation community. The Project will reduce the amount of hardscape and increase the amount of vegetated areas, thereby reducing and slowing surface run off and increasing the amount of natural water filtration compared to existing conditions. These changes will improve the quality of water contributed to Pulgas Creek by the Project Area, as well as improve the ecological conditions in the vicinity of the creek. There is some potential that the project will require work below the top of bank to enhance vegetation along the creek, and some potential that work may be required within the active channel of Pulgas Creek. Erosion control measures such as silt fencing and straw wattles will be implemented along the length of the stream during any work adjacent to or below the top of bank. While work affecting the ruderal vegetation along the banks of Pulgas Creek may require a CDFW permit, it is not a sensitive vegetation community and potential impacts to vegetation in this area **less than significant** under CEQA. Work within the Perennial Stream that improves ecological function of the creek would be wholly beneficial and **less than significant** under CEQA. Similarly, work within the creek that maintains existing conditions but involves placement of fill to avoid potential future adverse consequences would be considered **less than significant** under CEQA because there would be no long term adverse change to current conditions in the creek. Given the current condition of the creek, potential temporary water quality and habitat disturbance effects resulting from access to complete these beneficial improvements would also be **less than significant**. **Potentially significant impacts** to Pulgas Creek could include activities within the creek that result in a loss of perennial stream or include work that would result in an increase of unvegetated bank armoring along the creek.

Potential Impact BIO-3: If Project activities include work within Pulgas Creek, those activities could result in a loss of perennial stream area or introduction of additional unvegetated armoring along the creek bank, which is a potentially significant impact.

To reduce potential impacts to Perennial Stream to a **less-than-significant** level, the following mitigation measure shall be implemented:

Mitigation Measure BIO-3: If the Project completes work within Pulgas Creek, it will be designed to result in a net benefit to the ecological conditions to the extent feasible. If work within Pulgas Creek results in a loss of area within the channel or addition of new reaches of unvegetated bank armoring, these impacts will need to be mitigated for at a minimum 1:1 ratio on a functions and values basis ("no net loss"). Required mitigation can be met by creating or enhancing stream and riparian habitat on-site or off-site, purchasing wetland credits (1:1 ratio) from a mitigation bank, or other suitable method of mitigation determined appropriate by the regulatory permitting agencies.

7.1.4 Impacts and Mitigation Evaluation for Wetlands and Other Areas Regulated by Section 404 of the Clean Water Act

This section analyzes the Project's potential impacts and mitigation for wetlands and other areas presumed or determined to be within the jurisdiction of the Corps or BCDC in reference to the significance threshold outlined in CEQA Appendix G, Part IV (c):

- a) Does the Project have the potential to have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;*

The Project Area contains 0.36 acres of Perennial Stream which are potentially regulated by state and/or federal law. With the implementation of Mitigation **Measure BIO-3**, potential impacts to the Perennial Stream will be reduced to a **less-than-significant** level.

7.1.5 Impacts and Mitigation Evaluation for Habitat Corridors and Linkages

This section analyzes the Project's potential impacts and mitigation for habitat corridors and linkages in reference to the significance threshold outlined in CEQA Appendix G, Part IV (d):

- a) Does the Project have the potential to 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;*

Movement and migratory corridors are segments of land that provide a link between core habitat areas (Beier 1992, Soule and Terborgh 1999). The majority of the Project Area is developed and is within a densely developed urban area. Pulgas Creek has limited vegetative cover and is disturbed (Sakrete) and culverted in many sections. Pulgas Creek may facilitate movement of local wildlife adapted to high levels of anthropogenic disturbance, but does not provide a connection between areas of core habitat in natural

areas. There is **no impact** to movement or migratory corridors resulting from the Project because no movement or migratory corridors are present on the site.

7.1.6 Impacts and Mitigation Evaluation for Local Policies and Ordinances

This section analyzes the Project's potential impacts and mitigation based on conflicts with local policies and ordinances in reference to the significance threshold outlined in CEQA Appendix G, Part IV (e):

e) Does the Project have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance;

The Project may involve ground-disturbance within or near Pulgas Creek. Under the City of San Carlos Municipal Code, Chapter 18.14, such activity within Pulgas Creek or within 25 feet of the top of bank of Pulgas Creek will require a use/grading permit from the City. The Project will be obtaining a use and grading permit from the City and will therefore not conflict with this ordinance.

The Project may impact trees that meet the definition of Protected Tree under section 18.18.070 of the City of San Carlos municipal code. A tree removal permit will be obtained from the City of San Carlos prior to the removal of Protected Trees, in compliance with City code. Therefore, the project will not conflict with this requirement of City code.

There is no impact of the Project resulting from potential conflict with local codes and ordinances protecting biological resources.

7.1.7 Habitat Conservation Plans

This section analyzes the Project's potential impacts and mitigation based on conflicts with any adopted local, regional, and state habitat conservation plans in reference to the significance threshold outlined in CEQA Appendix G, Part IV (f):

f) Does the Project have the potential to conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Project Area is not located within the plan area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and therefore would not have the potential to conflict with any such plans.

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Attachment A. Land Cover Types

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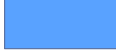


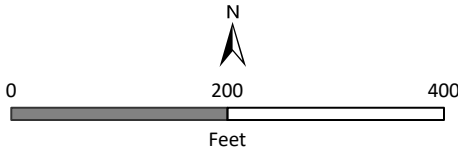
Attachment A.
Land Cover Types
(Overview)

Alexandria District Phase 2
San Carlos, California

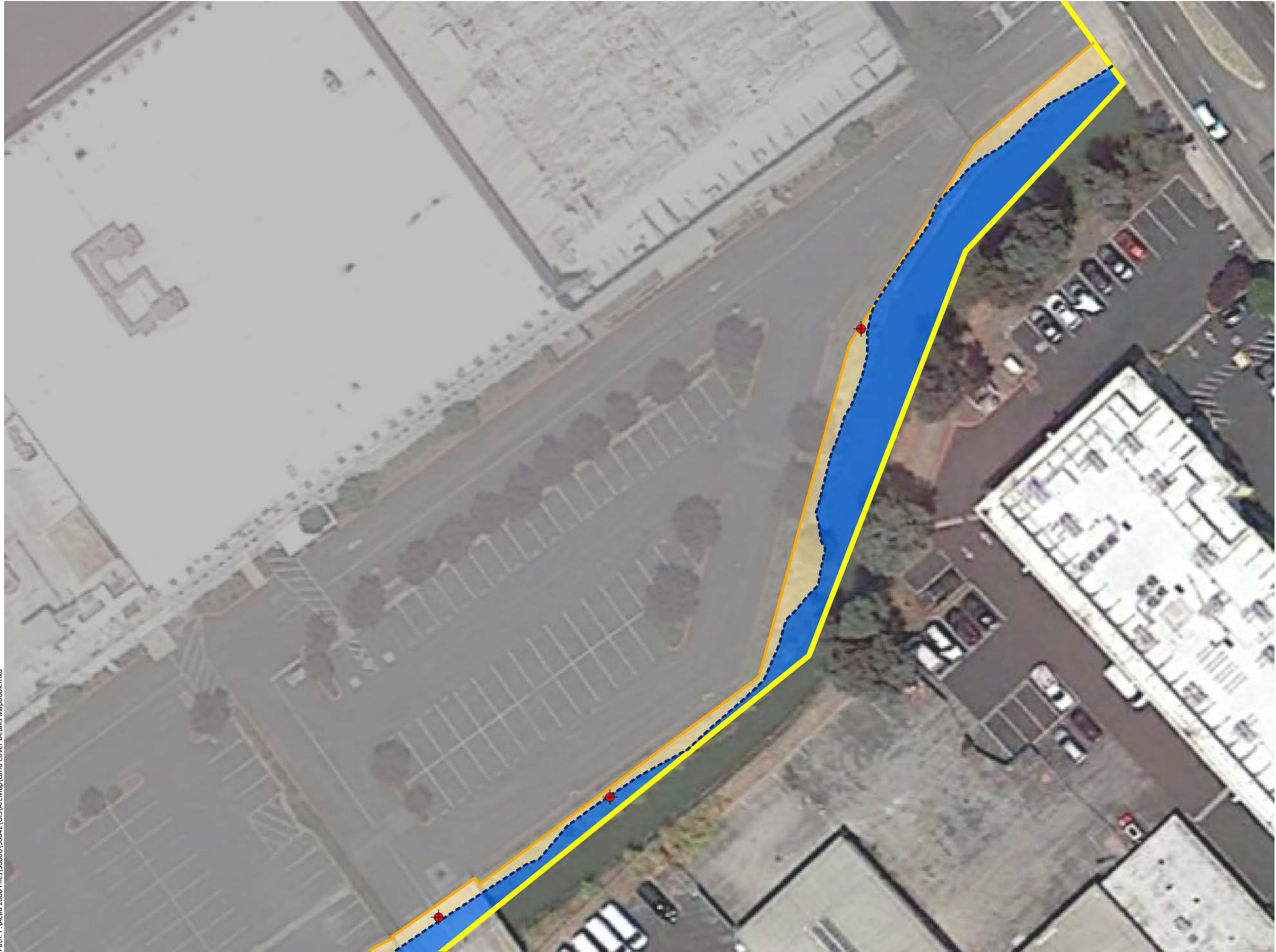
-  Project Area - 25.33 ac.
-  Culverts
-  Extent Below Ordinary High Water Mark - 0.36 ac.
-  Extent Below Top of Bank - 0.61 ac.

Land Cover Types

-  Associated Ruderal Vegetation - 0.25 ac.
-  Developed - 24.72 ac.
-  Perennial Stream - 0.36 ac.







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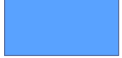


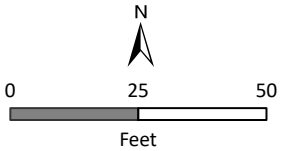
Attachment A.
Land Cover Types
(Detail Area 1)

Alexandria District Phase 2
San Carlos, California

-  Project Area - 25.33 ac.
-  Culverts
-  Extent Below Ordinary High Water Mark - 0.36 ac.
-  Extent Below Top of Bank - 0.61 ac.

Land Cover Types

-  Associated Ruderal Vegetation - 0.25 ac.
-  Developed - 24.72 ac.
-  Perennial Stream - 0.36 ac.







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Sources: Google Earth 2018 Aerial, WRA | Prepared By: mrochelle, 8/26/2020



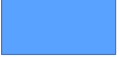


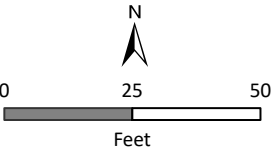
Attachment A.
Land Cover Types
(Detail Area 2)

Alexandria District Phase 2
San Carlos, California

-  Project Area - 25.33 ac.
-  Culverts
-  Extent Below Ordinary High Water Mark - 0.36 ac.
-  Extent Below Top of Bank - 0.61 ac.

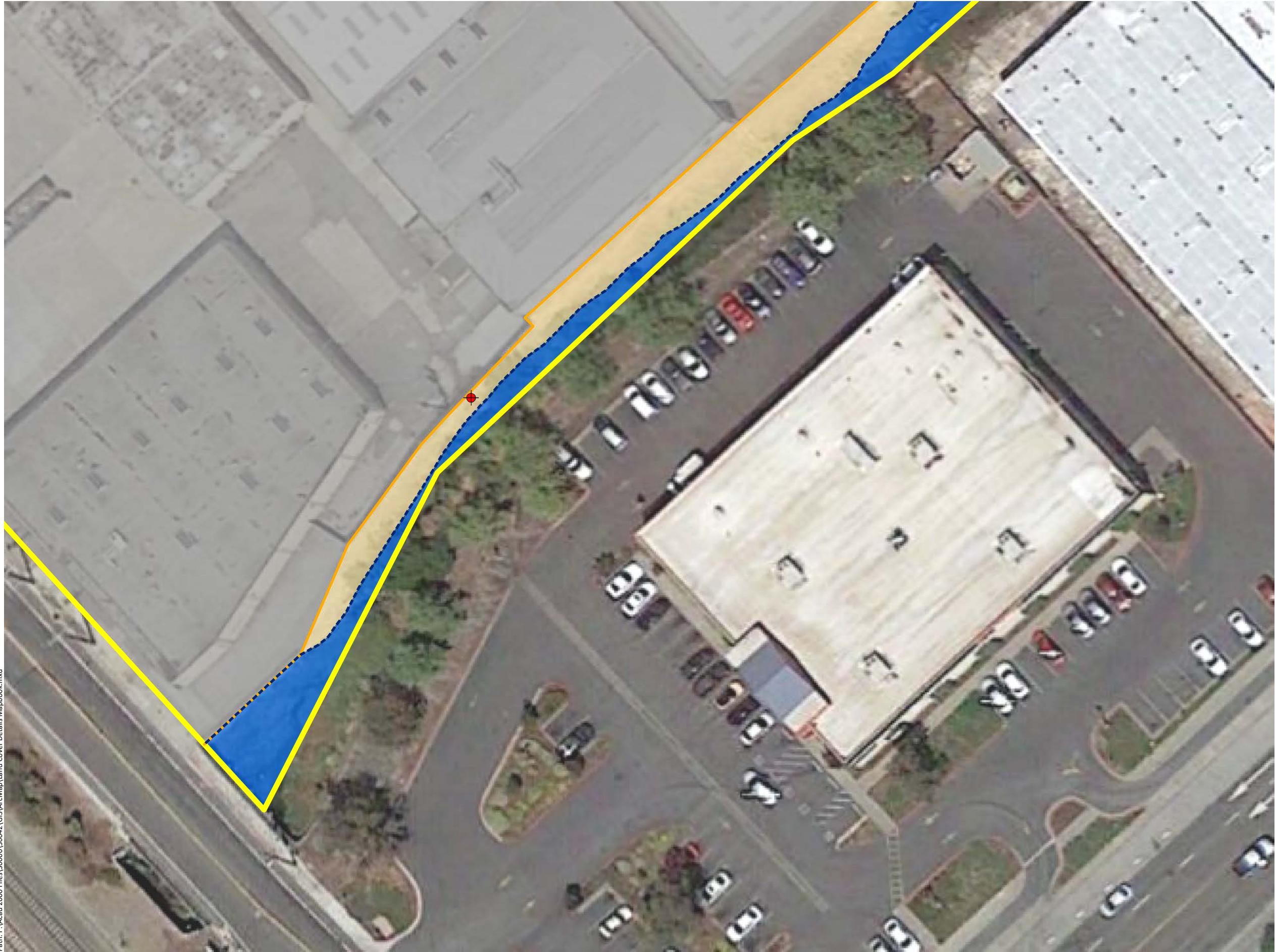
Land Cover Types

-  Associated Ruderal Vegetation - 0.25 ac.
-  Developed - 24.72 ac.
-  Perennial Stream - 0.36 ac.







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Sources: Google Earth 2018 Aerial, WRA | Prepared By: mrochelle, 8/26/2020



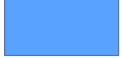


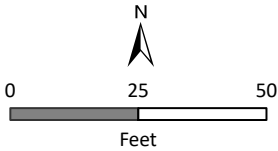
Attachment A.
Land Cover Types
(Detail Area 3)

Alexandria District Phase 2
San Carlos, California

-  Project Area - 25.33 ac.
-  Culverts
-  Extent Below Ordinary High Water Mark - 0.36 ac.
-  Extent Below Top of Bank - 0.61 ac.

Land Cover Types

-  Associated Ruderal Vegetation - 0.25 ac.
-  Developed - 24.72 ac.
-  Perennial Stream - 0.36 ac.



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ATTACHMENT B:
HISTORIC ASSESSMENT

ATTACHMENT TO THE
JUNE 2021
ALEXANDRIA DISTRICT FOR SCIENCE AND TECHNOLOGY PROJECT
INITIAL STUDY

December 28, 2020 – DRAFT

ALEXANDRIA DISTRICT

900-960 INDUSTRIAL RD., 987-1003-1011 COMMERCIAL ST., SAN CARLOS

Historic Resource Evaluations

This report provides an historical evaluation of five parcels and buildings located at the above addresses. The purpose of this evaluation effort is to determine if the subject properties and buildings do or do not qualify as historic resources per the California Register of Historical Resources (CR) criteria and with respect to the California Environmental Quality Act (CEQA).

This evaluation effort is based on site visits to survey and record the buildings and their setting. Prior records were also collected and reviewed, including previous environmental reports,¹ historic maps and aerial views, historic telephone directories,² as well as available building permit records from the City of San Carlos. As this effort was undertaken in the course of the Covid pandemic, numerous research avenues were restricted or off limits. Thus, no San Mateo County deed research was undertaken nor were historical archives accessed.

EVALUATION SUMMARY

The five subject properties and buildings are sited on portions of a block directly east of downtown San Carlos, bound by Old County Rd. (west), Industrial Rd. (east), Commercial St. (north and Brittan Ave. (south)).³ (see figs.1-4)

Based on empirical as well as historical evidence, the subject building designs are without identifiable design or construction distinction. In most cases, no documentary evidence of the buildings' origins has been located and no original architects, engineers, etc. are identifiable. Nor have any important persons been identified as individually associated with these individual buildings. Additionally, the five subject parcels and buildings are not directly associated with any events of historic significance because no individual discoveries, innovations or inventions of importance are identifiably associated.

This evaluation report therefore concludes that the five existing properties and buildings at 900 and 960 Industrial Rd., and 987, 1003 and 1011 Commercial St. in San Carlos do not meet any applicable historic resource criteria so are not eligible for the CR.

HISTORICAL SETTING

In the first half of the 20th century, fill of the San Francisco Bay shoreline and construction of the Bayshore Highway interconnecting San Francisco and San Jose provided a new landscape and development zone along the eastern boundaries of the cities of the San Francisco Peninsula, including San Carlos. The Bayshore Highway and associated bay fill dates to the late 1930s while the present-day Bayshore (aka James Lick) Freeway succeeded the highway within some twenty years. Based on historic topographic maps, in the 1940s, prior to any development, the subject block was essentially at the historic shoreline. Once filled, development was enabled eastward from the

¹ Ramboll Environ, *Phase 1 and Phase II Environmental Site Assessment[s]: 900 Industrial Road [and] 960 industrial Road*; April 25, 2017.

² San Mateo County directories, Library of Congress (loc.org), accessed Nov.-Dec.2020.

³ For the purposes of this report, descriptive orientations place the freeway to the east and downtown San Carlos to the west.

center of San Carlos, yet which development awaited the post-World War II period. As remains in evidence today, much of the surrounding development was industrial, yet commercial and residential development were also in the 1950s mix.

The subject block retains direct and indirect characteristics of the historic bayfront context. Given its former waterfront location, however easily forgotten, the overall site falls within a range of current regulatory flood zones. Though not quite forgotten, the at least forsaken channel of Pulgas Creek crosses the block from east to west, its course surrounded by the remnants of 20th century industrial uses.

Along Old County Road and the railroad as well as nearer to downtown, the western sides of the subject and adjoining blocks were first developed with industries. The earliest developments on the subject block were a Mathews Conveyor Company factory at the northwest corner, where the present-day Kelly Moore Paint store exists and, directly to the east of that property, a food processing facility for Kuster Laboratories, first occupied in 1949 and which is the existing building at 1011 Commercial St.

Also by way of context, some of the earliest developments on the directly adjoining blocks were for companies who subsequently moved onto the subject block. Litton Industries' first plant was on the block to the south, across Brittan Ave., and the original Kelly Moore plant was on the block to the north, along Old County Road. Litton Industries acquired their land at 960 Industrial Rd. in the mid-1950s and where they had built the first structure of their complex in 1955. Kelly Moore also began to acquire properties on the subject block in the mid-1950s, their first acquisition the aforementioned Mathews facility at the address 1015 Commercial St., where Kelly Moore was first listed in 1956 and whose uses and facilities expanded along the Old County Rd. front into the large complex that Kelly Moore has only recently vacated (this effort did not research the overall Kelly Moore holdings so provides no detailed information about that complex).

The Industrial Rd. front of the subject block first experienced development in the mid-1950s. The existing commercial-industrial building at 900 Industrial Rd. was erected c1954 and added to c1958. Following their 1955 building, Litton Industries added increments to their 960 Industrial Rd. property, first expanding the original building with a northern addition in 1959. Thereafter, Litton added two rearward structures in 1960 and 1968, then attached the front and rear buildings with their 2 story add in the early 1980s.

Along Commercial St., the office building at 987 (originally 999) Commercial dates to c1965. The last building to be added, at 961 Commercial, was constructed in 1976.

Uses of this range of commercial and industrial properties varied. The 900 Industrial and 1003 Commercial buildings were erected speculatively, so have had multiple tenancies. The 1011 Commercial St. building was constructed c1949 for Kuster Laboratories, a food processing company, yet who vacated within a handful of years, the building having then also gone through a number of users. The Litton property was one of their tube manufacturing facilities from 1955 to c2005. And the 987 Commercial St. building was purpose-built c1965 for Quantic Industries, a military industrial component manufacturer who were by then occupants of the two adjoining Commercial St. buildings, yet who vacated their buildings within a decade.

SUMMARY DESCRIPTIONS & HISTORIES

900 Industrial Rd. (figs.5-9)

900 Industrial (APN 046-162-010) is a 33,600 square foot commercial-industrial building with a shallow, 2 story commercial-office front at the northwestern corner of Industrial Rd. and Commercial St., facing Industrial. Behind is an attached, tall single story industrial warehouse, its elongated northern side on Commercial Street. The building largely fills its site, a rectangle with a skewed front (east) property line, which is some 142 feet wide by 322.5 feet (north) – 310 feet (south) deep.

While no original records have been located, based on available information, the building's front and the frontward two-thirds of its warehouse were constructed c1954. At that time, the commercial front was 1 story. The rearward portion of its warehouse was added c1958 and the second story at its front was completed in 1993.

There is no evidence of what the original commercial front looked like originally. Given the addition of a story, it is presumed that the exterior design of the existing front dates to 1993. That front consists of an off-center entrance way with 2 stories of metal sash doors and windows separated by a wood transom at the line of the second floor. That entry's vertical arrangement counters the façade's overall horizontality, which consists of five horizontal bands, two of which collect rows of metal sash windows at each floor, three sets at each side of the entry way and which bands are dark painted, vertical board sided and wood trimmed. The other three bands – including a shallow apron below the first floor windows, a broader spandrel separating the window bands and a taller, parapeted upper wall above – are finished with light colored plain stucco (cement plaster). The top of parapet is capped by a continuous metal coping and the parapet surrounds the front structure's flat roof on three sides.

Between the building front and concrete sidewalk along Industrial Rd. is a shallow planting strip, which is interrupted where the sidewalk extends into the entry way, its plan angled to follow the line of the front property line and street.

The banded façade treatment and shallow planting strip returns at the Commercial St. (north) side for approximately 20 feet, wherein there is a set of windows and door below and a set of windows centered above. Beyond, the long north side wall of the industrial structure is painted concrete, the building's bays expressed by vertical joints at columns, the walls at each bay having an upper window with industrial steel sash or a loading door opening, the latter infilled with storefront entrances or upward acting metal loading doors.

At the south, where the façade and planting strip return internal to the site, the 2-story wall is plain stucco without window bands. The continuation of that internal building side is a long painted concrete wall relieved only by vertical joints at columns and there is no apparent differentiation between the original warehouse and its addition. The narrow strip of utility space between the south wall and property line is largely fenced yet with a couple of frontward trees.

The rear wall is also painted concrete with two openings with surface mounted, coil-type steel loading doors. A shed stands outboard of this wall at its south end.

Lastly, the tops of the shallow, membrane-surfaced, four vaulted roof segments of the industrial structure are partly visible above the building walls.

As noted, 900 Industrial Rd. dates from 1954 with later additions. The property owner at the time of its construction was Eugene A. Mignacco, who evidently built for real estate investment. The original tenant was Globe Container Co., a paper tube manufacturer, who occupied this location from 1954-c1958. A subsequent owner in the 1980s and later was Richard and Brigitte Saiya, who were owners when the second floor was added. Subsequent tenants included the Tilley Manufacturing Co. in the 1960s and 70s. Multiple tenancies followed while, in directory listings, at least a portion of the building's address was identified as 950 Commercial St., where Hatcher Trade Press was listed from the late-1970s into the early 1990s.

Available building permit records start with a 1976 reroof for Mignacco. Completion of the 1993 second floor office addition was for the Saiyas, which permit was first applied for in 1985. A 1989-1990 alteration permit was for Hatcher Press at 950 Commercial. And a 1998 reroof was also for the Saiyas.

The property owner at the time of the subject property's development, Eugene A. Mignacco (1899-1985). At that time, per San Mateo County directory listings, Mignacco was the general manager of the Western Can Co. in San Jose and resided in Hillsborough. Mignacco owned the 900 Industrial Rd. property and its building from c1954-c1976. No other specific historical information has been located for Mignacco.

Lastly, no architects, engineers, designers or builders have been identified for the design and construction of the c1954 900 Industrial Rd., nor for its c1993 addition.

960 Industrial Rd. (figs.10-16)

960 Industrial Rd. (APN 046-162-290) is an agglomerated industrial building complex in five primary parts, its earliest southeastern part built in 1955, followed by a 1959 addition to the north, which together comprise the existing building fronting on Industrial. Two separate rearward buildings were subsequently added, the north half in c1961, the southern half in 1968. In 1982, the front and rear structures were joined together by the central 2-story addition. Beyond these five parts and largely within the confines of the site, there are numerous external building and site accretions.

For the purposes of this historic resource evaluation, the four earlier building parts are salient whereas the 1982 addition, however central, stands outside the potential historical period.

The existing overall building footprint totals some 195,000 square feet on a 10.68 acre site. Drives, yards, loading and parking areas surround the building to the north and west. The primary entry into the site is from its southeast corner. Across the front of the building is a drive – along which are two building entry ways – and an outer parking strip with a landscape border between the parking and the sidewalk. A secondary entry to the site is at its northeastern corner and which also connects to the internal site areas via a drive that passes the north side of the building. To the south, the landscaped entry and drive into the site passes the building's southern front, where there are again two building entries, across which is a large open parking lot, also landscaped, that is bounded to its south by Pulgas Creek.

While the internal, north and east sides of this building complex are a complex jumble of industrial and utilitarian areas to the extent that those exteriors are for practical purposes indescribable, the character of the overall complex is present from its eastern front and southern side.

The front face is some 480 feet long, the south face 500 feet in length. While it was built in two parts, the front has a unified exterior with a repetitive, expressed concrete frame at approximately 20 foot wide bays infilled with concrete walls with, excepting at the two entry ways, horizontally oriented glass block window units vertically centered. The two entry ways have clear aluminum sash entry door and window units below flat projecting canopies. The southern entry is evidently primary, as it is wider, its canopy deeper and as the flanking exterior wall is built out. That entry way corresponds to the original, 1955 building and the north entry is part of the 1959 addition though, again, there is no visible evidence of two building parts from the front. What additionally unifies the front is the massive, projecting and vertically slatted metal screen that surmounts the front building wall for its full length. That screen returns for some 20 feet at the north side yet extends along the southern side for the full depth of the original building, where it is even higher as its bottom edge drops to cover more of the facade.

The south side wall of the 1955 building, which is seven bays deep with expressed concrete frames and infill walls, aligns with and terminates at the central, 2 story, 1982 addition. Beyond, to the west, again aligned, stands the exterior wall of the 1968, formerly detached rear building. That wall is also seven bays deep, its concrete columns expressed with plain, concrete infill walls except at the frontward bay, where there is a set of aluminum sash entry doors and windows. Atop this length of wall, a row of slightly recessed steel pipe railings are visible. This wall extends to metal sheds attached across the rear of the complex.

The 960 Industrial Rd. complex was constructed for Litton Industries beginning in 1955. Litton Industries and its successors occupied this property and its buildings until c2005. The Litton company was the creation of engineer Charles V. Litton (1904-1972). Founded in Redwood City in the 1930s, Litton sold his interests in 1954 to Charles Bates Thornton, who then established Litton Industries. This successor company relocated to the subject property beginning in 1955. Thereafter, Litton Industries deeded the property to a building contractor, William J. Moran, who built and leased the original 1950s buildings back to the company before passing property ownership on to Occidental Life Insurance Co. who, in 1981, deeded the property back to Litton Industries.

As summarized above, the 960 Industrial Rd. complex grew in increments, the first in 1955 followed by building additions in 1959, 1961, 1968 and 1982, along with numerous smaller exterior adds and alterations. Despite its scale and development period, relatively few and mostly miscellaneous building permit records exist, the only salient exterior permits for the 1968 (Daley & Trudell Construction, contractor) and 1981-82 (Hodgson Construction, contractor) additions.

987 Commercial St. (figs.17-22)

The 987 Commercial St. property (APN 040-162-270) houses a two-story office building fronting northward to Commercial St. and with open, paved parking lots at both sides and rear. The building first appears in a 1968 Sanborn map with the address labeled 999 Commercial. Quantic Industries were first listed at 999 Commercial in the 1969 directory (no 1968 directory available), whereas in 1967 Quantic was still listed at the address 1011 Commercial. A December 1968 permit record confirms that Quantic was responsible for the existing building and their contractor was the then property owner, Tanklage Construction. No original plans are available and, at this juncture, no information has been found about the building's architects, engineers, etc.

The parcel is a skewed rectangle measuring 243 feet at the front (north), 225 at the rear and some 202 feet deep, its western property line angled. The existing building stands forward with a shallow

front setback and is centered from side-to-side. The frontage and recessed entry way are landscaped with concrete pathways, a flagpole and a freestanding masonry sign wall, whereas its side and rear parking lots are asphalt paved right up to the inset building walls.

The building plan is almost a square, approximately 95 feet wide by 85 feet deep, with a cutout at front and center for the recessed entry way. Its taller upper story overhangs the lower level, which overhangs are supported by concrete masonry posts at each corner and in rows under the overhanging second story. Upper exterior walls are stucco (cement plaster) clad and the lower walls concrete masonry. The roof is flat, the tops of walls likewise flat and with capped. Its front walls are windowless except within the recessed entry, which has aluminum sashed and framed window and door units along with a 3-story masonry wall featuring a cascading ceramic artwork. Upper side walls have four sets of aluminum sash windows, the outer two units trios, the middle units pairs, each with similarly framed apron and transom panels. The upper rear wall has one window and door unit at its center, consisting of a doorway alongside a trio of windows, the upper doorway accessed via a concrete and metal exterior stair. And a recessed rear entry way is centered below. Lower exterior walls are otherwise solid except for several discrete doors. Various pieces of mechanical equipment hang from the underside of the overhang.

At the upper story walls, two paint colors establish a rhythmic pattern that minimally embellishes the building exterior. Architectural interest is otherwise focused in the front entry, with its landscaping, glazed walls and feature wall.

No visual information has been found to confirm the appearance of the original 1968 building. The subject property and its 1968 building changed hands c1975, following which the property's address was changed from 999 Commercial to 987. Several permit records also immediately followed for what appears to have been substantive building alterations, including new exterior signage. At this juncture, it may be that the building's architectural character predominately dates to 1977.

The 999 Commercial St. building was constructed on a vacant parcel under 1968 permits and for Quantic Industries, Inc., who then occupied the adjoining property and buildings at 1003-1011 Commercial. At the time of its construction, the subject property was owned by Bernard and Marguerite Tanklage. As noted, Tanklage Construction also built the 999 Commercial St. building.

Per news accounts, Quantic Industries was founded in 1957, its earliest address in Redwood City. In 1962, Quantic acquired the Peninsula Tool Co. who, at that time, was listed at 1010 Commercial. From 1962 to 1968, the Pelmec Division of Quantic was variously listed at 1003, 1010 and 1011 Commercial, thereafter at 999 Commercial. Quantic was another Peninsula industry directly serving the U.S. Military, to which their Pelmec Division contributed the manufacturing of "electromechanical and ordinance [i.e., explosive] devices for missile and aerospace industry."⁴ A 1968 business news brief reported on their proposed new "headquarters building," as announced by Quantic's board chairman, Morgan A. Gunst, Jr.,⁵ who was elsewhere identified as the company's founder.⁶

The subject property and building were sold to Kelly Moore Prop. Inc. c1976. At that time, Kelly Moore was listed at 1015 Commercial St., at the corner of Commercial and Old County Road. Kelly

⁴ From classifieds, *S.F. Examiner*, Oct. 13, 1963; p80.

⁵ "New Building For Quantic," *S.F. Examiner*, March 4, 1968; p57.

⁶ from obituary "Morgan A. Gunst Jr.," *S.F. Chronicle*, August 31, 1989; p35.

Moore still occupies the subject building (though this and surrounding properties have recently been transacted).

1003 Commercial St. (figs.23-26)

The building at 1003 Commercial (APN 046-180-110) is a tall single-story industrial building on an oblong, postage stamp parcel of approximately 88 feet wide by 150 feet deep. The building's plan is some 42 feet wide by 100 feet deep. It is a concrete frame building with concrete infill walls, its low-slope vaulted roof bound by parapet walls. The front façade, slightly taller than side and rear walls. Paved parking and drives surround the building, including at the front, which is set back from the street behind a paved and landscaped parking area. The front entry, a single aluminum framed door with surrounding lights under a shallow canopy and with a built-in brick planter, fills the lower right (west) side bay. Another set of windows over a planter box fills the lower left side bay. A large tree obscures the center and top of the façade. Most side and rear bays have sets of aluminum sash windows, those at the front west side low on the wall, the rest in the middle, vertically and horizontally. One west side bay has what appears to be a loading door infilled with wood siding and with a single flush entry door.

No original records have been located for this building. It did not yet exist in a 1956 aerial view yet is visible in a 1958 aerial. The building was first listed in the 1958 directory under the Peninsula Tool Co., who were also and previously listed at 1010 Commercial. Based on this general information, the building dates to c1958. Peninsula Tool was acquired by Quantic Industries in 1962, which is the date of the earliest available permit record for interior alterations at 1003 Commercial and for the owner Pelmec Division [of Quantic Industries], who were also identified as the contractor. A 1970 permit record listed the owner as Ferrex Corp. and an official 1977 parcel map was labeled "resubdivision of the lands of Degnan and Boivin" and signed by George M. Degnan and Harry G. Boivin. Lastly, the 1980 and 1985 directories listed Thermo Systems Inc. at 1003 Commercial.

1011 Commercial St. (figs.23,27-29)

1011 Commercial St. (APN 046-184-120), an oblong parcel with an approximate frontage of 258 feet and depth of 150 feet, houses a 2-story, flat-roofed, light industrial building with a footprint of some 46 feet wide by 100 feet deep. The building is setback from the street with a landscaped front yard, including a direct, concrete paved entry path from the street to the right (west) side building entry flanked by a raised brick planter. Otherwise, the surrounding site is asphalt paved parking and drives. The building's front façade is painted concrete masonry, as are its first floor exterior walls, including rows of projecting piers that support the overhanging upper story at each side. Its front entrance is a double-height, aluminum framed door and window unit. Sideward, the building is six unequal bays deep. Each of the recessed first floor bays has steel window and door units within the masonry wall. The upper story at both sides and rear is stucco (cement plaster) clad, metal capped. Continuous rows of industrial steel sash windows largely infill the upper side walls, three units per bay excepting at the front. At the rear, the first floor masonry wall, flush with the story above, has several steel sash windows, several blocked up, and a pair of metal entry doors at the east side. At the second story, an enclosed bridgeway to an adjacent building plugs into the rear façade at its center.

No original or early records have been located for the building at 1011 Commercial. In San Mateo County directories, it was first listed in 1949 under Kuster Laboratories, a San Francisco based food processing company whose president was William Kuster and who were, per a 1948 news clipping,

then expanding to San Carlos.⁷ The subject, 2-story “office and laboratory” building was included in the 1950 Sanborn fire insurance map, along with a rearward “food processing warehouse,” the two-building complex labeled “Kuster Laboratories, Inc.” Per directories, Kuster was last listed in this location in 1954. Thereafter, the address was listed as vacant in 1958 then listed under Quantic Industries in 1963. The earliest available permit record for “repairs,” dated October 1966, again identified Quantic as the owner. Thereafter, a number of companies were listed at 1011 Commercial – American Regitel (1970), American EFTS (1977), John Dobbs (1978), GJAS Inc. and Pacific Instruments International (1982). Owners included Degnan and Boivin (1977) and John Dobbs (1978), the former identified in a property survey, the latter in a building permit record for fire repairs. The Kelly Moore Paint Co. acquired the property c1982.

HISTORIC CONTEXTS

As summarized above, relative to the historical setting of the subject block, there are two primary historical contexts.

Historic Development Context

The development context of the subject and adjoining blocks is strictly post-war, as development in the immediate vicinity occurred only after WWII, when the five subject, contiguous resources were each constructed for commercial and industrial uses on what was, until then, undevelopable land. This development context is directly situated in the post-World War II, American suburbanization and transportation boom, which context also embodied the outset of large-scale conversion of agricultural land. This development context was far-ranging in the post-war period throughout the region, including the towns and cities of the San Francisco Peninsula, each of which then experienced extensive new industrial, commercial and residential development.

Historic Architectural Context

Given their period of development, each of the subject resources relates to mid-20th century, commercial and industrial design and construction.

While smaller cities the likes of San Carlos have not addressed historic contexts re: modern architecture and landscape architecture, other regional jurisdictions have prepared context statements for Modern resources. For example, San Jose’s Modern context statement and which encompasses architecture in the overall period from 1935-1975 yet which does not have a directly applicable category for Modern industrial resources.⁸ Thus, the most applicable historic context statement to the subject buildings is the City of San Francisco’s which, in addition to addressing the broad range of Modern resources specifically addresses the Midcentury Modern style.⁹ As documented therein:

Midcentury Modern and late interpretations of the International Style were the primary styles applied to everyday residential, commercial, and institutional buildings. Midcentury Modern design elements include:

- *Cantilevered roofs and overhangs*

⁷ “Laboratories Will Expand,” *S.F. Examiner*, April 23, 1949.

⁸ Past Consultants. *San Jose Modernism Context Statement*. June 2009.

⁹ Mary Brown, San Francisco City and County Planning Department. *San Francisco Modern Architecture and Landscape Design 1935-1970: Historic Context Statement*, September 30, 2010.

- *The use of bright or contrasting colors*
- *Projecting eaves*
- *Canted windows*
- *Projecting boxes that frame the upper stories*
- *Stucco siding*
- *Spandrel glass*
- *Large expanses of windows*
- *Flat or shed roof forms*
- *Vertical corrugated siding*
- *Stacked roman brick cladding*
- *And, occasionally, vertical wood siding.*
- *New technology and materials, such as plastic laminates, spandrel glass, and anodized metal sheaths were increasingly incorporated in midcentury modern buildings.*

Midcentury Modern design reflected the emerging philosophy of indoor-outdoor living. Design elements such as overhanging trellises, pergolas, atriums, and planters integrated in the building's design literally wedded the building form to the environment. Projecting trellises, in particular, were a notable design element of residential, commercial, and institutional buildings.¹⁰

While these descriptions and characterizations are most applicable to architecturally designed residential, commercial and institutional resources, the overall characterization is applicable toward gauging the character of built resources from the mid-century period.

EVALUATION

The five subject parcels and their buildings have not previously been evaluated for historic resource eligibility. In order to address the requirements of the California Environmental Quality Act (CEQA) specific to historic resources, the current effort has been requested and is intended to provide such historic resource evaluation.

Under CEQA, which apply the California Register of Historical Resources evaluation criteria, historic resources are generally greater than 50 years old. For planning purposes, current CEQA Guidelines establish 45 years of age as the threshold at which properties and their buildings should be evaluated as historic resources. In this instance, there are five parcels with built resources greater than 45 years:

- 900 Industrial Rd., a street-corner parcel with a mixed commercial-light industrial building constructed between c1954-c1958 (and with a c1993 addition).
- 960 Industrial Rd., a large parcel with an amalgamated industrial facility dating from c1955-1968 and with multiple adds (including a large 1982 addition).
- 987 Commercial St., a mid-block parcel with an office-warehouse building dating to c1965.
- 1003 Commercial St., the smallest of the five subject parcels with a c1959 light industrial building.
- 1011 Commercial St., another light industrial building that, dating to c1949, is the earliest of the five subject buildings.

¹⁰ *San Francisco Modern Architecture*, pp.115-116.

While resources less than 45 years old are not excluded from historic resource consideration, such recent resources must be demonstrably exceptional. With respect to the buildings and portions thereof as well as the users added to the five subject parcels post-1975, there is no conceivable exceptionality. Consequently, no post-1975 buildings, portions of buildings or users are herein evaluated.

The following provides an evaluation summary comprehensively addressing the five subject resources and including, where applicable, criterion-specific evaluations of the individual resources.

To be eligible for listing on the California Register (CR), a resource must be historically significant at the local, state, or national level, under one or more of the following four criteria.

1. *It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;*

In general, in their post-WWII development context, there is no potential historical significance associated with the numerous individual properties that generally fit that far-ranging pattern of events, the subject resources included.

More specifically, an associated pattern of historic events that directly applies to the subject properties – the one exception being the speculative commercial-industrial building at 900 Industrial – is mid-20th century military-related industrial development on the San Francisco Peninsula.

In the U.S. during the combined post-World War II and Cold War period, military-industrial development surrounded and adjoined nodes of military-sponsored technological research and development. Such nodes included major research universities, U.S. military bases and related institutions and installations. While the pattern was national and the San Francisco Bay Area was not alone, the S.F. Peninsula had several such nodes, including Stanford University and Mather Air Force Base, both of which spun off and supported numerous research and manufacturing ventures that commercially exploited largely military sponsored technologies. By extension, such mid-20th century industries throughout the S.F. Peninsula were participants at the outset of commercialization of digital technologies.

Though this development pattern was, in the mid-1900s, concentrated to a far greater extent in Santa Clara County, the cities of San Mateo County were also participants. Including San Carlos, where the newly filled bay shore – an endeavor that was also government subsidized via federal highway funding – provided developable sites that were then occupied by a range of uses yet with a concentration of military-industrial ventures.

Relative to the subject block, there were two direct examples of such ventures: Litton Industries (960 Industrial Rd.) and Quantic Industries (987-1003-1011 Commercial St.). Both corporations developed and manufactured specific military components.

This pattern of military-industrial and technological events is directly associated with most of the subject parcels. However, their individual associations were minor. In these cases, as there is no evidence of any major technological contributions with direct associations to the subject parcels, there is no evidence of individual historic significance.

For example, while the Charles Litton founded company can claim historic significance for their early contribution to electron tube manufacturing, those contributions pre-date Litton Industries and their 960 Industrial Rd. facilities. Litton Industries further exemplifies this pattern of events as, based on early success, they established a local industrial plant. At that same time, Litton became a highly dispersed corporation with headquarters in Southern California, which locale was even closer to the center of the U.S. military and aerospace industry.

Quantic Industries, who first acquired the then existing building at 1011 Commercial St. and who thereafter expanded into 1003 Commercial before constructing 987 Commercial, developed and manufactured individual military components that were a small part of large and widely dispersed military applications. And like Litton, Quantic was founded elsewhere prior to acquiring and expanding their Commercial St. facilities.

In sum, while the subject properties have an association to this broad historic pattern of events, there is no evidence of any major or individual importance directly associated with the subject properties. Consequently, these five properties and their buildings do not meet CR criterion 1.

2. *It is associated with the lives of persons important to local, California, or national history;*

Several identifiable individuals were directly associated with the origins of three of the subject properties:

900 Industrial Rd. – In its potential historical period of 1954-1975 (from its origins until, under the CR, a minimum of 45 years ago), the property and building at 900 Industrial Rd. were directly associated with one individual, Eugene A. Mignacco. The c1954 building was evidently speculatively built for real estate investment purposes, not for specific uses for or associated with Mignacco, whose career and residence was elsewhere. As there is no evidence that Mignacco has historical importance, 900 Industrial Rd. is not directly associated with any individuals of identifiable historic importance.

960 Industrial Rd. – In its potential historical period of c1954-1975, the property and building at 960 Industrial Rd. is not directly associated with any specific individuals. While Charles Litton founded the company, he sold his interests to Litton Industries prior to their relocation to the subject site. Additionally, Litton Industries was a large corporate entity to whom many persons were associated, so 960 Industrial Rd. is not directly associated with individuals of identifiable historic importance.

987 Commercial St. – One specific individual is directly associated with the 1968 building at 987 Commercial St., Morgan A. Gunst, Jr., one of the founders and subsequent president of Quantic Industries. While there is basic evidence that Gunst was a successful industrialist, there is no evidence that he has any historical importance.

The other two subject properties at 1003 and 1011 Commercial St. have institutional origins wherein individual persons are not in evidence.

As none of the identifiably associated persons have identifiable historic importance, none of the five subject resources meet CR criterion 2.

3. *It embodies the distinctive characteristics of a type, period, region, or method of construction, or*

represents the work of a master, or possesses high artistic values;

Each of the five subject resources were built in the Post WWII period, that period ranging from the mid-to-late 1940s into the mid-to-late 1960s. The earliest building in this grouping, 1011 Commercial, dates to c1949. The latest (of greater than 45 years of age), 987 Commercial, to 1968.

900 Industrial Rd. – The 900 Industrial Rd. building is a utilitarian Modern design, as the building is a low, rectangular and non-descript container for light-industrial use and built in the mid 20th century. A small strip (approx. 20 ft. deep) across its front is an architectural appendage to the bulk of the industrial building, which character is minimal and which has also been added to in recent decades.

960 Industrial Rd. – The 960 Industrial Rd. building is a large agglomeration of industrial facilities. The overall building lacks distinction in terms of its design and construction, as there are no inventive, unique or prototypical design forms or building systems. Rather, the industrial building parts exhibit utilitarian and expeditious design and construction. The original complex has also been extensively altered and added to, including with the large and central 1982 addition that interconnects the earlier buildings.

987 Commercial St. – The 987 Commercial St. office and warehouse building is a suburban late-Modern building design, its limited architectural character focused at its front and, more specifically, within its recessed front entry space. The building is otherwise surrounded by parking and situated on a block of modest commercial and industrial development. Its standardized masonry and wood construction is of no identifiable design or construction importance. Further, as a building is of the late 1960s, thus at the very terminus of the Modern period, this commercial building completely lacks representation of its late Modern period of origin. Moreover, the character of the original building exterior is not known yet was altered post-1975, when the subsequent owner (Kelly-Moore) acquired the property. It is also evident that the extant exterior painting, signage and artwork were not original to the building but date to post-1975.

1003 Commercial St. – The 1003 Commercial St. building is a generic industrial building with no architectural character or construction interest.

1011 Commercial St. – Similar to the 987 Commercial St. building, 1011 Commercial is a two-story, commercial office-over-warehouse building. Its structure combines concrete masonry and wood frame, its nearly solid front façade the former. Building elements are limited to a tall, aluminum framed entrance and to rows of steel sash windows at each side. No extant design or construction characteristics of this building have any distinction relative to their mid-century period and style.

Relative to their mid-20th century period, each of these commercial and industrial resources have, to varying extents, Modern design characteristics.

Each of these buildings lack distinction in terms of their design and construction, as there are no inventive, unique, prototypical or distinctive design forms or building systems. Rather, the largely industrial buildings exhibit utilitarian and expeditious design and construction while the more commercial buildings are generic design and construction. Additionally, each of the properties

and buildings have been altered and/or added to so have accrued building chronologies that extend forward into the recent and non-historic period (less than 45 years ago).

Further, no evidence has been found to identify any original engineers, architects or designers. Several contractors are identifiable relative to 960 Industrial Rd., including William J. Moran, the builder of the 1950s structures; and Daley & Trudell Construction, the contractor for the 1968 addition. The contractor for the 987 Commercial St. building was Tanklage Construction. However, none of those contractors are identifiably important to history.

Lastly, while most of these built resources directly interrelate to their mid-20th century period of development, there is no evidence of any planning or design interrelationships. Rather, as is the case with much 20th century industrial development, the buildings and structures were expedient and utilitarian rather than planning or design oriented.

As the five subject buildings have negligible design and material character so do not embody design or construction distinction in terms of type, period, region or methods, nor are they the work of any identified architect, engineer or designer; nor are either of the identified builders identifiably important, nor do they possess any artistic value (the exterior artwork at 987 Commercial St. dates to post-1945, so is not herein addressed), the subject resources are not potentially eligible for the CR under CR Criterion 3.

4. *It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation;*

The five subject properties and buildings have not yielded and do not appear to have the potential to yield any important historic information beyond the present historical record (prehistory is outside the scope of this historical effort). As addressed herein, the subject resources do not present any historic information specific or unique to their context, setting or locale; each of the buildings are either plain, light-industrial structures of no identifiable design or construction interest, or commercial buildings of minor interest; none of their uses are identifiable importance and there are no associated individuals of historical interest. Thus, relative to the subject of this evaluation – potential historic resources – the five resources have not yielded and have no identifiable potential to yield important historical information, so do not meet CR Criterion 4.

In sum, the five existing resources at 900 and 960 Industrial Rd., and 987, 1003 and 1011 Commercial St. do not meet any applicable criteria so are not eligible for the CR.

Signed:



Mark Hulbert
Preservation Architect

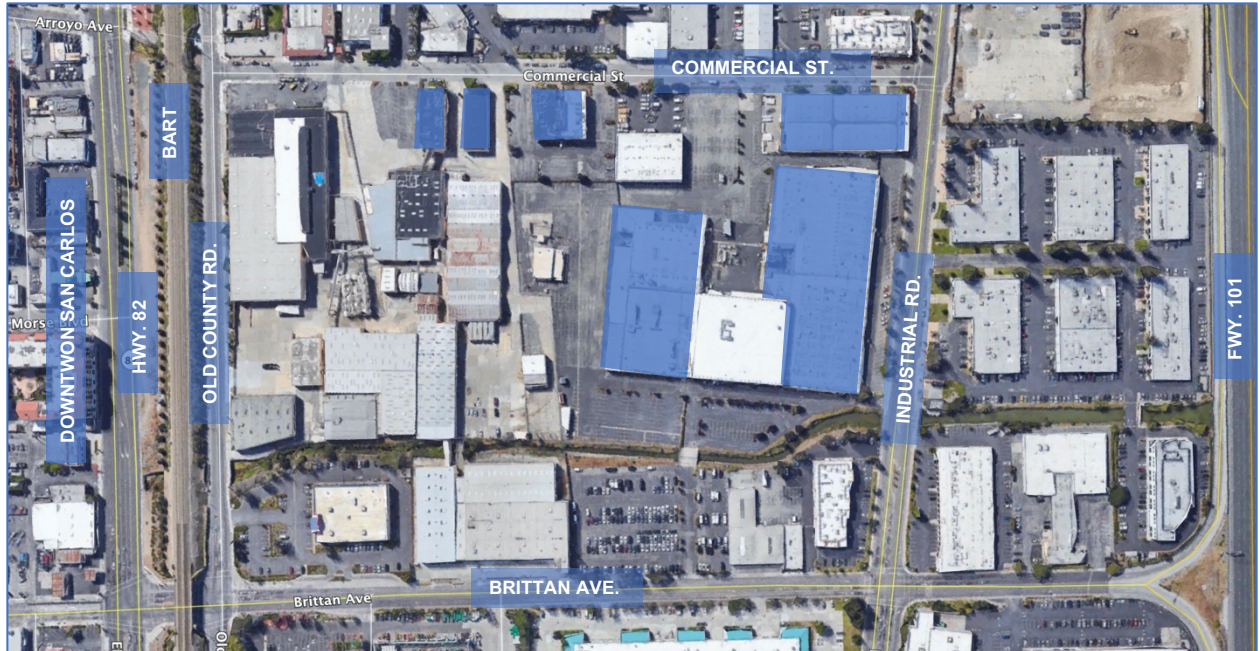


Fig.1 – Location aerial with subject building in blue (Google Earth, 2020, north at upper right)

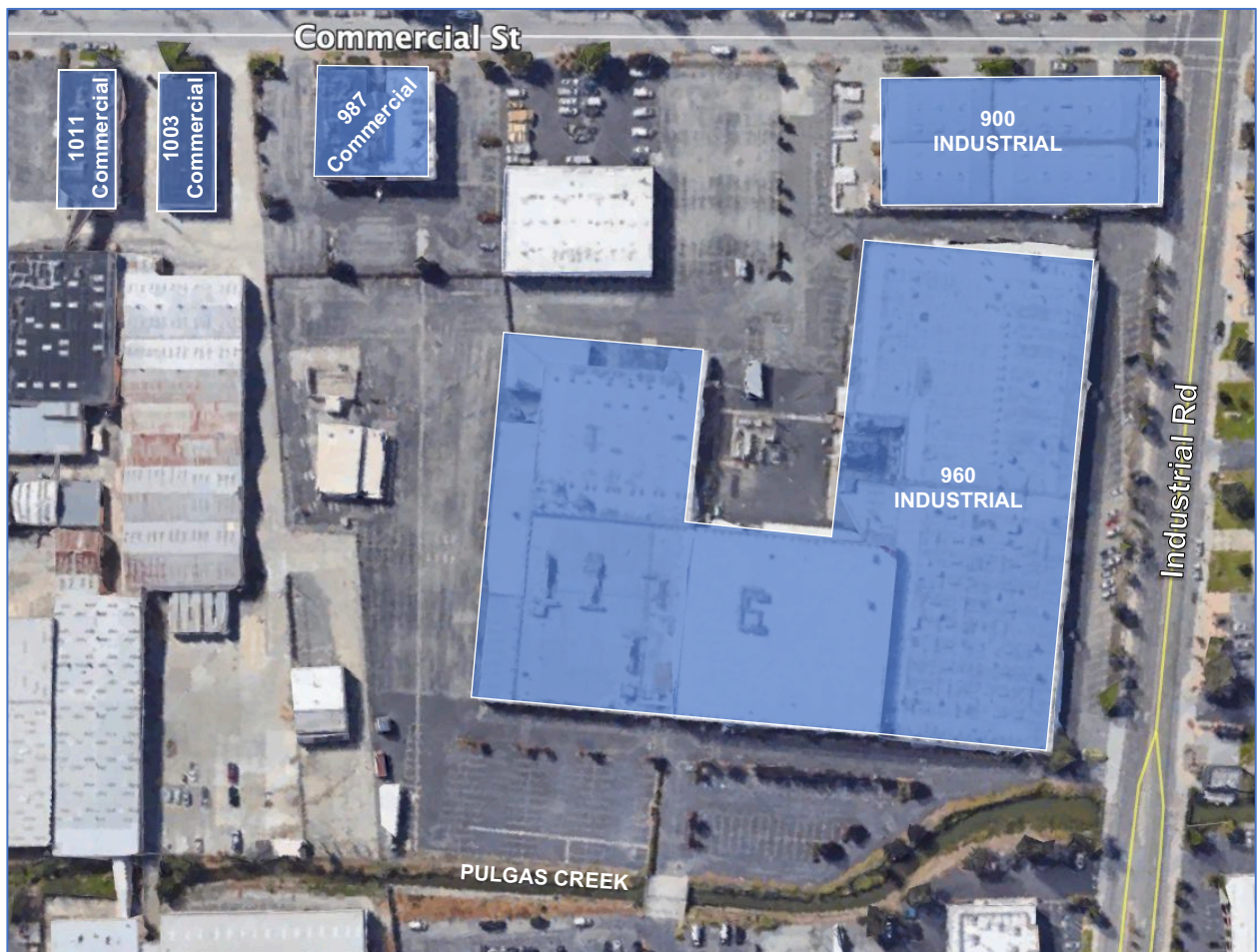


Fig. 2 – Site aerial with subject building identified (Google Earth, 2020, north at upper right)

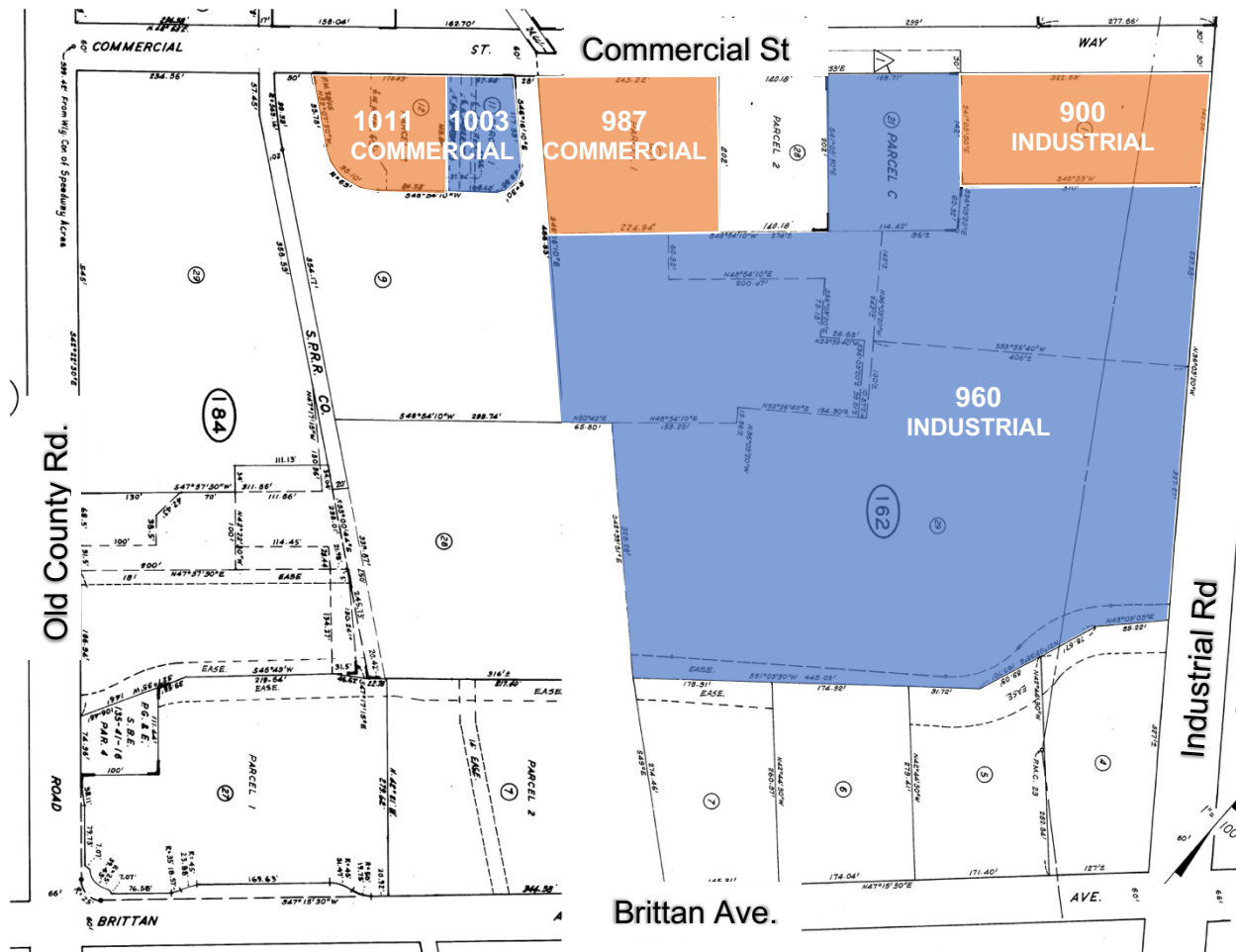


Fig.3 – Assessor's Parcel Maps with colors identifying subject parcels (north at upper right)



Fig.4 – Aerial view, 1974, depicting subject block approx. 45 years ago (north at upper right)



Fig.5 – 900 Industrial Ave., aerial (Google Earth, 2020, north at upper right)



Fig.6 – 900 Industrial Ave., front (east) from Industrial Rd. (MH, 2020 unless otherwise noted)



Fig.7 – 900 Industrial Ave., north side from Commercial St.



Fig.8 – 900 Industrial Ave., south side



Fig.9 – 900 Industrial Ave., rear (west)



Fig.10 – 960 Industrial Ave., aerial (Google Earth, 2020, north at upper right)



Fig.11 – 960 Industrial Ave., south half of front (east)



Fig.12 – 960 Industrial Ave., north half of front (east)



Fig.13 – 960 Industrial Ave., south side, looking west from site entry on Industrial



Fig.14 – 960 Industrial Ave., south side, looking northeast from parking lot



Fig.15 – 960 Industrial Ave., partial rear, looking southeast



Fig.16 – 960 Industrial Ave., partial rear, looking west

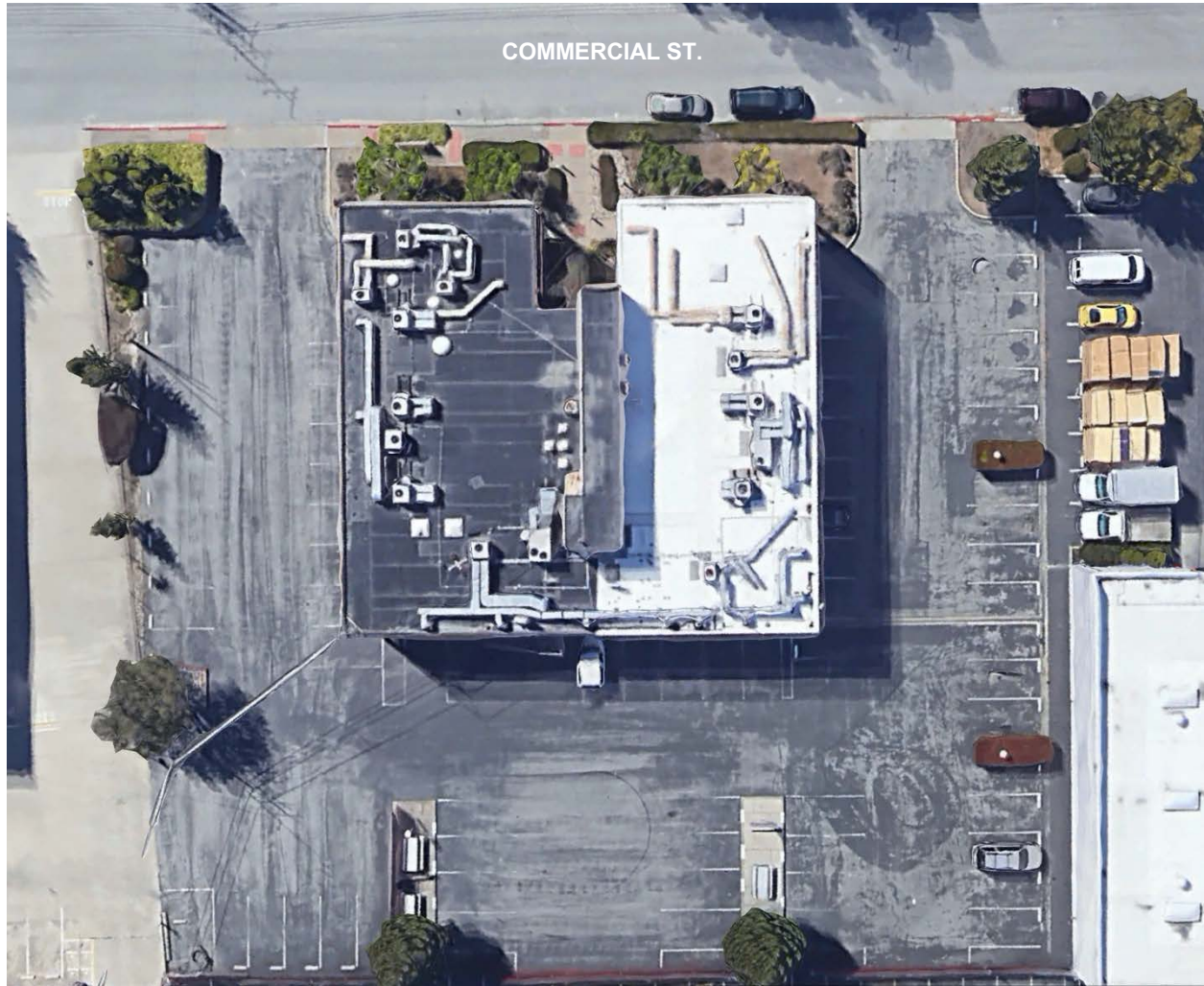


Fig.17 – 987 Commercial St., aerial (Google Earth, 2020, north at upper right)



Fig.18 – 987 Commercial St., front (north) and west side



Fig.19 – 987 Commercial St., front (north)



Fig.20 – 987 Commercial St., front (north) entry



Fig.21 – 987 Commercial St., rear (south) and east side



Fig.22 – 987 Commercial St., rear (south) and west side

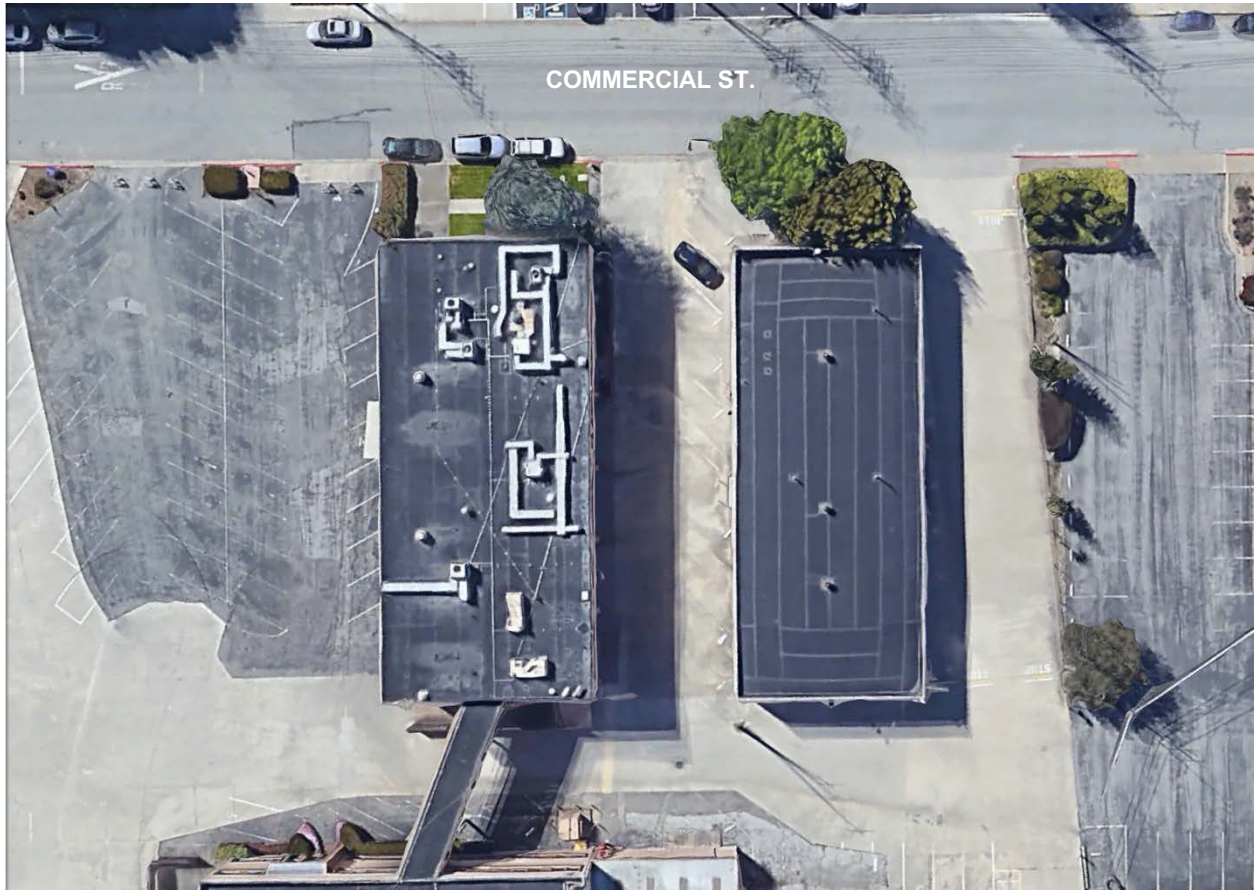


Fig.23 – 1011 (left) and 1003 (right) Commercial St., aerial (Google Earth, 2020, north at upper right)



Fig.24 – 1003 Commercial St., front (north) and west side (Google Earth, 2020)



Fig.25 – 1003 Commercial St., east side and front (Google Earth, 2020)



Fig.26 – 1003 Commercial St., west side and rear



Fig.27 – 1011 Commercial St., front (north) and west side (Google Earth, 2020)



Fig.28 – 1011 Commercial St., east side and front (Google Earth, 2020)



Fig.29 – 1011 Commercial St., west side and rear

ATTACHMENT C:

CULTURAL RECORDS SEARCH, NATIVE AMERICAN HERITAGE
COMMISSION RESPONSE

ATTACHMENT TO THE
JUNE 2021
ALEXANDRIA DISTRICT FOR SCIENCE AND TECHNOLOGY PROJECT
INITIAL STUDY

CALIFORNIA
HISTORICAL
RESOURCES
INFORMATION
SYSTEM



ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE

HUMBOLDT
LAKE
MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO

SAN FRANCISCO
SAN MATEO
SANTA CLARA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
150 Professional Center Drive, Suite E
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
<http://www.sonoma.edu/nwic>

November 13, 2020

NWIC File No.: 20-0887

Rebecca Auld
Lamphier-Gregory, Inc.
1944 Embarcadero
Oakland, CA 94606

Re: Record search results for the proposed Alexandria District Project in the City of San Carlos.

Dear Ms. Rebecca Auld:

Per your request received by our office on the 5th of November, 2020, a rapid response records search was conducted for the above referenced project by reviewing pertinent Northwest Information Center (NWIC) base maps that reference cultural resources records and reports, historic-period maps, and literature for San Mateo County. Please note that use of the term cultural resources includes both archaeological resources and historical buildings and/or structures.

Review of this information indicates that there have been two cultural resource studies that in total, cover approximately 45% of the Alexandria District Project area, Study # 48738 (Jurich and Grady 2011) and Study # 38684 (Kozakavich and Merritt-Smith 2008). This Alexandria District Project area contains no recorded archaeological resources. The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, lists no recorded buildings or structures within or adjacent to the proposed Alexandria District Project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the proposed Alexandria District Project area.

At the time of Euroamerican contact the Native Americans that lived in the area were speakers of the Ramaytush language, part of the Costanoan/Ohlone language family (Levy 1978:485). There are Native American resources in or adjacent to the

proposed Alexandria District Project area referenced in the ethnographic literature [the village area of *Lamsin* (Levy 1978:485)].

Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of San Mateo County have been found in areas marginal to the San Francisco Bayshore and inland near intermittent and perennial freshwater courses. The Alexandria District Project area is located in the San Carlos area along the historic bayshore margins of San Francisco Bay and its associated wetlands. The project area contains both artificial fill and Holocene alluvial fan deposits, and is located immediately adjacent to Pulgas Creek just south of Steinberger Slough. Given the similarity of these environmental factors and the ethnographic sensitivity of the area, there is a moderately high potential for unrecorded Native American resources to be within the proposed Alexandria District Project area.

Review of historical literature and maps indicated the possibility of historic-period activity within the Alexandria District Project area. The 1894 Map of San Mateo County indicated the project area was located within the lands of T.G. Phelps. With this in mind, there is a moderately high potential for unrecorded historic-period archaeological resources to be within the proposed Alexandria District Project area.

The 1956 photorevised 1980 San Mateo and the 1959 photorevised 1968 and 1973 Redwood Point USGS 7.5-minute topographic quadrangles depict several buildings or structures within the Alexandria District Project area. If present, these unrecorded buildings or structures may meet the Office of Historic Preservation's minimum age standard that buildings, structures, and objects 45 years or older may be of historical value.

RECOMMENDATIONS:

1) There is a moderately high potential of identifying Native American archaeological resources and a moderately high potential of identifying historic-period archaeological resources in the project area. Given the potential for archaeological resources in the proposed Alexandria District Project area, our usual recommendation would include archival research and a field examination. The proposed project area, however, has been highly developed and is presently covered with asphalt, buildings, or fill that obscures the visibility of original surface soils, which negates the feasibility of an adequate surface inspection.

Therefore, prior to demolition or other ground disturbance, we recommend a qualified archaeologist conduct further archival and field study to identify archaeological resources, including a good faith effort to identify archaeological deposits that may show no indications on the surface.

Field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of buried archaeological resources. Please refer to the list of consultants who meet the Secretary of Interior's Standards at <http://www.chrisinfo.org>.

2) We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

3) The proposed Alexandria District Project area contains several unrecorded buildings or structures that may meet the Office of Historic Preservation's minimum age standard that buildings, structures, and objects 45 years or older may be of historical value; therefore, prior to commencement of project activities, it is recommended that these resources be assessed by a professional familiar with the architecture and history of San Mateo County. Please refer to the list of consultants who meet the Secretary of Interior's Standards at <http://www.chrisinfo.org>.

4) Review for possible historic-period buildings or structures has included only those sources listed in the attached bibliography and should not be considered comprehensive.

5) If archaeological resources are encountered **during construction**, work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. **Project personnel should not collect cultural resources.** Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with

square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

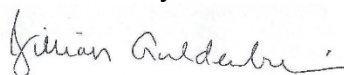
6) It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the Office of Historic Preservation's website: https://ohp.parks.ca.gov/?page_id=28351

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Thank you for using our services. Please contact this office if you have any questions, (707) 588-8455.

Sincerely,



Jillian Guldenbrein
Researcher

LITERATURE REVIEWED

In addition to archaeological maps and site records on file at the Northwest Information Center of the Historical Resources Information System, the following literature was reviewed:

Bromfield, Davenport

1894 Official Map of San Mateo County, California

General Land Office

1834, 1867, 1917 Survey Plat for Rancho Pulgas, Township 5 South/Range 4 West.

Grady, Amber and Richard Brandi (PBS&J)

2011 *California High-Speed Train Project Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section Historic Architectural Survey Report, Technical Report.*
NWIC Report S-048738a

Helley, E.J., K.R. Lajoie, W.E. Spangle, and M.L. Blair

1979 *Flatland Deposits of the San Francisco Bay Region - Their Geology and Engineering Properties, and Their Importance to Comprehensive Planning.*
Geological Survey Professional Paper 943. United States Geological Survey and Department of Housing and Urban Development.

Jurich, Denise and Amber Grady (PBS&J)

2011 *California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section, Archaeological Survey Report, Technical Report.* **NWIC Report S-048738**

Kaptain, Neal (LSA Associates, Inc.)

2009 *Smart Corridors Geoarchaeological Sensitivity Research (letter report).*
NWIC Report S-038684a

Kozakavich, Stacy and Alexandra Merritt-Smith (LSA Associates, Inc.)

2008 *A Cultural Resources Study for the San Mateo County SMART Corridors Project, San Mateo County, California.* **NWIC Report S-038684**

Levy, Richard

1978 Costanoan. In *California*, edited by Robert F. Heizer, pp. 485-495. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Nelson, N.C.

1909 *Shellmounds of the San Francisco Bay Region.* University of California Publications in American Archaeology and Ethnology 7(4):309-356. Berkeley.
(Reprint by Kraus Reprint Corporation, New York, 1964)

Nichols, Donald R., and Nancy A. Wright

1971 Preliminary Map of Historic Margins of Marshland, San Francisco Bay, California.
U.S. Geological Survey Open File Map. U.S. Department of the Interior, Geological
Survey in cooperation with the U.S. Department of Housing and Urban Development,
Washington, D.C.

San Mateo County Historic Resources Advisory Board

1984 *San Mateo County: Its History and Heritage*. Second Edition. Division of Planning
and Development Department of Environmental Management.

State of California Department of Parks and Recreation

1976 *California Inventory of Historic Resources*. State of California Department of Parks
and Recreation, Sacramento.

State of California Office of Historic Preservation **

2019 *Built Environment Resources Directory*. Listing by City (through December 17, 2019).
State of California Office of Historic Preservation, Sacramento.

**Note that the Office of Historic Preservation's *Historic Properties Directory* includes National
Register, State Registered Landmarks, California Points of Historical Interest, and the California
Register of Historical Resources as well as Certified Local Government surveys that have
undergone Section 106 review.

**NATIVE AMERICAN HERITAGE COMMISSION**

November 12, 2020

Rebecca Auld, Senior Planner
Lamphier-GregoryVia Email to: rauld@lamphier-gregory.comCHAIRPERSON
Laura Miranda
LuiseñoVICE CHAIRPERSON
Reginald Pagaling
ChumashSECRETARY
Merri Lopez-Keifer
LuiseñoPARLIAMENTARIAN
Russell Attebery
KarukCOMMISSIONER
Marshall McKay
WintunCOMMISSIONER
William Mungary
Paiute/White Mountain
ApacheCOMMISSIONER
Julie Tumamait-Stenslie
ChumashCOMMISSIONER
[Vacant]COMMISSIONER
[Vacant]EXECUTIVE SECRETARY
Christina Snider
Pomo**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Alexandria District Project, San Mateo County

To Ms. Auld:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Sarah.Fonseca@nahc.ac.gov.

Sincerely,



Sarah Fonseca
Cultural Resources Analyst

Attachment

**Native American Heritage Commission
Tribal Consultation List
San Mateo County
11/12/2020**

***Amah Mutsun Tribal Band of
Mission San Juan Bautista***

Irenne Zwiernie, Chairperson
789 Canada Road
Woodside, CA, 94062
Phone: (650) 851 - 7489
Fax: (650) 332-1526
amahmutsuntribal@gmail.com

Costanoan

The Ohlone Indian Tribe

Andrew Galvan,
P.O. Box 3388
Fremont, CA, 94539
Phone: (510) 882 - 0527
Fax: (510) 687-9393
chochenyo@AOL.com

Bay Miwok
Ohlone
Patwin
Plains Miwok

***Costanoan Rumsen Carmel
Tribe***

Tony Cerda, Chairperson
244 E. 1st Street
Pomona, CA, 91766
Phone: (909) 629 - 6081
Fax: (909) 524-8041
rumsen@aol.com

Costanoan

***Indian Canyon Mutsun Band of
Costanoan***

Ann Marie Sayers, Chairperson
P.O. Box 28
Hollister, CA, 95024
Phone: (831) 637 - 4238
ams@indiancanyon.org

Costanoan

***Indian Canyon Mutsun Band of
Costanoan***

Kanyon Sayers-Roods, MLD
Contact
1615 Pearson Court
San Jose, CA, 95122
Phone: (408) 673 - 0626
kanyon@kanyonconsulting.com

Costanoan

***Muwekma Ohlone Indian Tribe
of the SF Bay Area***

Charlene Nijmeh, Chairperson
20885 Redwood Road, Suite 232
Castro Valley, CA, 94546
Phone: (408) 464 - 2892
cnijmeh@muwekma.org

Costanoan

***Muwekma Ohlone Indian Tribe
of the SF Bay Area***

Monica Arellano,
20885 Redwood Road, Suite 232
Castro Valley, CA, 94546
Phone: (408) 205 - 9714
marellano@muwekma.org

Costanoan

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and section 5097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Alexandria District Project, San Mateo County.

The following are comments received in response to the above
Notice of Preparation / Initial Study
for the Alexandria Center for Life Science Project

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



July 28, 2021

SCH #: 2021060668
GTS #: 04-SM-2021-0366
GTS ID: 23446
Co/Rt/Pm: SM/82/5.94

Lisa Costa Sanders, Planning Division
600 Elm Street
San Carlos, CA 94070

Re: Alexandria Center for Life Science Notice of Preparation (NOP)

Dear Lisa Costa Sanders:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Alexandria Center for Life Science 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 following comments are based on our review of the June 2020 NOP.

Project Understanding

The project involves construction of an office/research and development (R&D) campus-style development on the 25-acre site bounded by Industrial Road to the east, Commercial Street to the north, Old County Road to the west, and Pulgas Creek to the south.

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](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in align with the City's VMT policy. Projects that do not meet the

screening criteria should include a detailed VMT analysis in the DEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines or the Office of Planning and Research's (OPR) Technical Advisory. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.
- Clarification of the intensity of events/receptions to be held at the location and how the associated travel demand and VMT will be mitigated.

Mitigation Strategies

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the proposed project site is identified as a Close-In Compact Community where community design is fair and regional accessibility is strong.

Given the place, type and size of the project, the DEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Project design to encourage mode shift like walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information systems;
- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;
- Designated parking spaces for a car share program;

- Wayfinding and bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area;
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement;
- VMT Banking and/or Exchange program;
- Orientation of project towards non-auto corridor;
- Incorporation of bicycle lanes in street design;
- Pedestrian network improvements;
- Limiting parking supply; and
- Bike parking near transit facilities.

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

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 include the City of San Carlos' Traffic Impact Fee (Chapter 8.50). 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.

Lead Agency

As the Lead Agency, the City of San Carlos 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.

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.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please email LDIGR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is fluid and cursive, with a long horizontal stroke at the end.

MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

From: [dawn cavallini](#)
To: [Lisa Costa Sanders](#)
Subject: Alexandria District Project
Date: Tuesday, June 29, 2021 4:26:34 PM

[**NOTICE:** This message originated outside of City of San Carlos -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Good afternoon,

I was reading about the proposed project and had a concern about the pedestrian impact on Industrial. With the building of the last building on the other side of Industrial over the past months there was a huge increase in pedestrian traffic that was obstructive of traffic. This occurred especially when there was a change in shift of the contractors.

I was noticing that these two projects will be very close to each other and looks as if parking might be shared? My concern is the increase in pedestrian crossing of Industrial and of Construction trucks that was a pain. Is there a way to address this? Is there a way to create a foot bridge? While I understand the importance of stopping traffic for workers to cross safely this disrupted traffic and flow on a busy corridor. Will this continue once construction workers finish and employees of these facilities take over. It would be nice if this issue can be addressed?

Dawn Aveggio
1600 Howard Ave.
San Carlos
dawnkx100@sbcglobal.net

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.



NATIVE AMERICAN HERITAGE COMMISSION

July 1, 2021

Lisa Costa Sanders
City of San Carlos
600 Elm Street
San Carlos, CA 94070



CHAIRPERSON
Laura Miranda
Luiseño

Re: 2021060668, Alexandria Center for Life Science Project, San Mateo County

VICE CHAIRPERSON
Reginald Pagaling
Chumash

Dear Ms. Costa Sanders:

SECRETARY
Merri Lopez-Keifer
Luiseño

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

COMMISSIONER
Julie Tumamali-Stenslie
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:

A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - 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.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:

Sarah.Fonseca@nahc.ca.gov.

Sincerely,



Sarah Fonseca
Cultural Resources Analyst

cc: State Clearinghouse

TO: Lisa Costa Sanders, Planning Commissioners

FROM: Debbie and Gary Baldocchi, 1852 Carmelita Dr., San Carlos, CA

RE: Alexandria Center for Life Sciences Project Environmental Impact Report (EIR) Scoping Hearing, 987 Commercial Street 9APNs 046-162-010, 210, 270, 280 and 290; and 046-184-090, 110, 120, 280, 290, and 300)—**Public Comments**

DATE: July 19, 2021

Thank you for inviting public comment for EIR scoping for Alexandria Center Project. We are most concerned about the environmental impacts of high-density commercial development on the riparian waterway (Pulgas and Brittan Creeks), shallow ground water tables, flooding, sea level rise, king tides, building in FEMA flood zones that are contaminated with toxic and hazardous chemicals and building below grade. Here are some specific items we mentioned in opposition to the 1030 Brittan development that is also on the agenda tonight.

- (1) Deny any set back exceptions for 25 feet creek bank setback.**
- (2) Deny any underground basements or parking due to the shallow water tables and fact that the entire area is in a FEMA flood zone and the soil is grossly contaminated with toxic hazardous chemicals.**
- (3) Have EIRs include a more detailed hydrology assessment that addresses the possible increased risks of flooding, specifically, risks caused by building large underground structures directly into the shallow water table (one foot from the surface on some parts of the property), more frequent king tides, and San Carlos' lack of sufficient levees and inadequate flood prevention infrastructure, such as outdated storm and sewer pumping stations near the Pulgas outflow into Smith Slough.**
- (4) Have EIRs assess the possible fiscal and environmental impacts on Pulgas and Brittan Creekside properties owners who live upstream from the developments whose properties may suffer significant damage from flooding, runoff, or creekbank erosion caused by development that may block, impede or slow storm and flood water runoff from Pulgas and Brittan creeks into Smith Slough.**
- (5) Have EIRs assess the likelihood that the development could cause ground subsistence (projected to be 20 inches) and increase the risk of east side and Creekside flooding that could cause many low lying residential areas in San Carlos or areas along Brittan and Pulgas creeks to be designated as FEMA flood zones in the future which would require property owners to carry prohibitively expensive flood insurance. (This recently happened in the city of San Mateo and Redwood Shores.)**
- (6) Have EIRs EIR assess the likelihood of damage to existing underground infrastructure, such as utility lines, sewer lines, storm drain pipes and possibility of cracking or structural damage to foundations of nearby**

commercial and residential structures from the displacement of groundwater by the large underground basement, the weight of the buildings, projected 20 inch ground subsistence and possible increased flooding.

- (7) Have EIRs assess the effects of possible flooding that could cause temporary closure of Brittan Avenue, a primary emergency evacuation route.**
- (8) Have EIRs assess the environmental impact of disturbing soil that is grossly contaminated with toxic and hazardous chemicals resulting from prior heavy industrial use.**
- (9) Have EIRs assess air quality as it relates to exhaust from biotech exhaust stacks on building roofs. Include information about the number of stacks, the height of stacks, the velocity of the exhaust and the flow pattern of the exhaust as it relates to other buildings. Install air quality monitoring equipment within 100 feet of all other buildings, not just 300 feet from residential buildings.**

Thank you,

**Debbie and Gary Baldocchi
1852 Carmelita Drive**