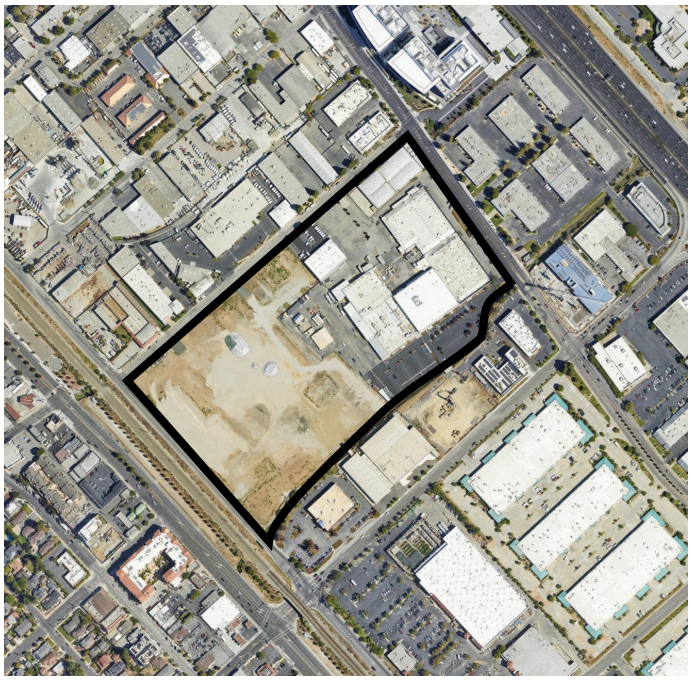
# Alexandria Center for Life Science Project

## Final Environmental Impact Report

SCH No. 2021060668



City of San Carlos
Planning Division
600 Elm Street
San Carlos 94070

February 2025

LAMPHIER - GREGORY
URBAN PLANNING, ENVIRONMENTAL ANALYSIS & PROJECT MANAGEMENT | 510.535.6690

# CONTENTS



## Appendices



## Figures

## Tables

*Page*

# 21

# INTRODUCTION TO THE FINAL EIR AND REVISED PROJECT

## PURPOSE OF THE FINAL EIR

The California Environmental Quality Act and the Guidelines promulgated thereunder (together "CEQA") require an Environmental Impact Report (EIR) be prepared for any project which may have a significant impact on the environment. An EIR is an informational document, the purposes of which, according to CEQA, are "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project."

This Final Environmental Impact Report (Final EIR), together with the Draft Environmental Impact Report (Draft EIR) published in July 2024, shall constitute the EIR for the proposed Alexandria Center for Life Science ("Project") in San Carlos, California. The Project Applicant is ARE-San Francisco No. 88, LLC. The Lead Agency is the City of San Carlos.

## REVISED PROJECT ASSESSMENT

The applicant has proposed revisions to the project since the analysis in the Draft EIR. Chapter 22 of this Final EIR summarizes the proposed changes and analyzes whether any new or substantially more severe significant environmental impacts would occur because of these project changes.

This document provides substantial evidence that these changes would not constitute "significant new information" and so would not require recirculation under section 15088.5 of the CEQA Guidelines. To that end, the following conclusions can be made from information in this document:

(1) The revised project would not result in a new significant impact.

(2) The revised project would not result in a substantial increase in the severity of an environmental impact.

(3) There are no new feasible alternatives or mitigation measures required to lessen significant environmental impacts of the revised project that the applicant declines to adopt.

(4) Project revisions do not result in fundamental inadequacies in the Draft EIR such that meaningful public review and comment were precluded.

## EIR REVIEW PROCESS

### Initial Study / Notice of Preparation

A Notice of Preparation (NOP) was issued in June 2021 to solicit comments from public agencies and the public regarding the scope of the environmental evaluation for the proposed project. The NOP and all

written responses to the NOP were presented in Appendix A of the Draft EIR and comments were taken into consideration during the preparation of the Draft EIR.

### DRAFT EIR

The Draft EIR was made available for a 60-day public review period, from July 25, 2024, through September 23, 2024. During the review period for the Draft EIR, the City received 5 written comments.

### FINAL EIR

This Final EIR contains all comments received by the City on the Draft EIR and also includes responses to these comments in Chapter 24. Revisions to the Draft EIR, consisting of minor text changes, additions or modifications to the Draft EIR, are included in Chapter 23 of this Final EIR.

None of the revisions or responses to comments contained in this Final EIR would be considered "significant new information" under section 15088.5 of the CEQA Guidelines; therefore, no recirculation of the Draft EIR is required.

The EIR will be presented to the Planning Commission at a public hearing to consider certification of this document as a technically adequate, full disclosure document consistent with the requirements of CEQA. Assuming certification of this EIR as complete and adequate under CEQA, the Final EIR, which includes the Draft EIR, will constitute the EIR for this project.

An EIR does not control the City's ultimate discretion on the project. In accordance with California law, the EIR must be certified before any action on the project can be taken. However, EIR certification does not constitute project approval.

## REPORT ORGANIZATION

This Final EIR consists of the following chapters, commencing after Chapter 20 of the Draft EIR:

**Chapter 21: Introduction to the Final EIR and Revised Project**. This chapter outlines the purpose, organization and scope of the Final EIR document and important information regarding the public review and approval process.

**Chapter 22: Revised Project Assessment**. This chapter includes a brief summary of the project sponsor's proposed changes to the project and provides a brief analysis of whether those proposed changes may result in a new or substantially more severe significant environmental effect beyond that as disclosed in the Draft EIR.

**Chapter 23: Revisions to the Draft EIR**. This chapter includes revisions to the Draft EIR based in part on comments received during the public review period.

**Chapter 24: Response to Comments**. This chapter provides the text of letters received on the Draft EIR. The text of each letter is separated into numbered comments. The responses to comments are also provided in this chapter immediately following each comment and are keyed to the numbered comments.

DOCUMENTS INCORPORATED BY REFERENCE

Pursuant to CEQA Guidelines section 15150, an EIR may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Information from the

documents that have been incorporated by reference has been briefly summarized in the appropriate sections of the EIR. All appendices to this document are incorporated by reference.

Materials that are included in the project files, which are available at City of San Carlos Planning Division at 600 Elm Street in San Carlos or digitally online at https://www.cityofsancarlos.org/business_detail_T10_R63.php, include:

- Planning Submittal plan sheets, dated 11/8/2024.
- H.T. Harvey, November 8, 2024, Alexandria Center for Life Sciences Avian Collision Risk Assessment.

# 22

# REVISED PROJECT ASSESSMENT

## INTRODUCTION

Following publication of the Draft EIR but prior to publication of this Final EIR, the applicant has proposed certain modifications to their proposed project (revised project). This chapter describes the revised project and assesses the revised project against the analysis in the Draft EIR to determine whether the impacts of the revised project fall within the scope of the impacts studied in the Draft EIR and whether any revisions to impacts and mitigation measures are required. The revisions to mitigation measures identified in this chapter would be carried forward in the Mitigation Monitoring and Reporting Program that would need to be adopted for the project to be approved.

## REVISED PROJECT DESCRIPTION

The changes from the original project analyzed in the Draft EIR are summarized below. Note that Figures 22.1 through 22.5 are included together on pages 22-4 through 22-8.

### BUILDINGS, MASSING, AND CIRCULATION

The overall usable floor area of the revised project would be the same as the original project, with a total of approximately 1,628,568 square feet. The revised Conceptual Site Plan and massing/elevations are shown in **Figures 22.1** and **22.2.** The individual buildings have been renumbered, redesigned, and reconfigured on the project site.

The buildings would vary in height from about 82 to 114 feet (previously about 80 to 116 feet). The total number of parking stalls is unchanged, though with the removal of the previously proposed surface lot, the parking garages would include approximately 3,335 parking spaces, increased from 3,200 previously, in five and eight levels of parking, respectively, including a rooftop and a basement level and would reach heights of between approximately 43 and 75 feet (previously between 59 and 70 feet tall). Building ("B") 4 is now directly adjacent to Parking Garage ("PG") 2, which has moved off of Commercial Street and is internal to the project site, and the amenity space in PG1 is now marked separately as B8.

The bird-safe design has been updated to reflect the new project site design. A full assessment of bird safety is included in the revised project application materials.[1]

Site circulation would change to reflect the revised building layout, as shown in **Figure 22.3**. Notable changes include a designated on-site shuttle stop/potential turn-around, formalized off-roadway vehicle drop off areas along all roadway frontages, and an enhanced pedestrian boardwalk to be built above mean high flood levels along the Pulgas Creek corridor. The same roadway and intersection improvements are proposed as part of buildout, though timing of the improvements has been revised as explained in the Phasing discussion below.

[1] H.T. Harvey, November 8, 2024, Alexandria Center for Life Sciences Avian Collision Risk Assessment.

## OUTDOOR SPACE, PULGAS CREEK, AND FLOOD CONTROL

The revised project remains a campus-like setting with buildings among landscaped and usable outdoor spaces, though specifics of outdoor spaces have been revised consistent with other plan changes. Notable changes include the addition of a plaza in front of B5 along Commercial Street, addition of active use sports courts in the internal courtyard, aesthetic enhancement of the large central green/stormwater detention area, and further widening of the Pulgas Creek open space corridor.

Project revisions have been made related to flood management, though stormwater elements still include bioretention areas throughout the site and a central landscaped stormwater retention area. As shown in **Figure 22.4a** through **22.4d** (and Appendix J), revisions have been made to the Pulgas Creek improvement plan specifically with respect to greater flood water capture ("conveyance capacity") along the Pulgas Creek corridor and include the following elements:

- Improvements between Industrial Road and the proposed Central Green area required to mitigate existing flooding conditions without adversely impacting offsite areas include:
    - Creek top and bottom widened to be integrated into the ACLS site design to increase conveyance capacity within the ACLS site.
    - The proposed creek top of bank elevation is kept similar to existing elevation or lowered to reduce the risk of causing flooding offsite.
    - Central green landscape area depressed at center of the site for flood detention purposes.
- All proposed and existing slopes are improved to reduce the long term risk of erosion using a combination of Geoweb panels, riprap, native planting, and vegetated retaining stair walls.
- All pedestrian walkways along the Creek within the flood mitigation & ecology zone will be elevated above the ground on a boardwalk.

New flooding analysis was completed by WRA, for both the entire revised project and Phase 1 separately, and determined that the revised project would meet the performance target that off-site flooding would be equivalent to existing conditions (see Appendix K).[2,3]

## PHASING

The phasing has been revised, as shown in **Figure 22.5** and with a comparison to the original project in **Table 22.1**.

In both the original and revised projects, Phases 1 and 2 are each about 30% of the total buildout, with Phase 3 completing the final 39%. The revised project's phasing would leverage the currently vacant area for an interim parking lot until the Phase 2 parking garage is constructed. Compared to the original project, the revised project would simplify implementation of roadway and creek corridor improvements by completing the roadway improvements in Phase 1 and Phase 3 and the creek improvements within a single phase, Phase 2. The revised project would implement Commercial Street improvements, including intersection improvements at Industrial Road and interim intersection improvements at Old County Road,

[2] WRA, Inc., November 2024, Alexandria Center for Life Sciences at San Carlos Updated Master Plan Pulgas Creek Flooding Analysis.

[3] WRA, Inc., November 2024, Alexandria Center for Life Sciences at San Carlos Phase 1 Flooding Mitigation Technical Memorandum.

as a part of Phase 1. All improvements to Pulgas Creek are proposed as a part of Phase 2. The creek improvements are subject to approval of the necessary permits and obtaining the necessary rights of entry and landowner consents for offsite work. All improvements to Old County Road, including final improvements at the Commercial Street intersection, are proposed as a part of Phase 3.

**Table 22.1: Comparison of Original versus Revised Project Details by Phase**

| | Original Project | | | Revised Project | | |
|---|---|---|---|---|---|---|
| **Phase** | **Structures[1]** | **Approx. Usable Floor Area[2]** | **Approx. Percent Total of Buildout** | **Structures[1]** | **Approx. Usable Floor Area[2]** | **Approx. Percent of Total Buildout** |
| Phase 1 | B5, B6<br>PG1 (amenity) | 519,962<br>9,150 | 32% | B1, B2 | 502,610 | 31% |
| | Corridor improvements: Old County Road (all), western end of Commercial Street western end of Pulgas Creek. | | | Corridor improvements: Commercial Street (all) | | |
| Phase 2 | B1, B4<br>PG2 (retail)<br>B7 (amenity) | 457,509<br>4,500<br>11,543 | 29% | B3<br>B4, PG2<br>B7 (amenity) | 330,600<br>137,962<br>15,722 | 30% |
| | Corridor improvements: eastern end of Commercial Street | | | Corridor improvements: Pulgas Creek (all) | | |
| Phase 3 | B2, B3 | 628,904 | 39% | B5, B6<br>B8 (amenity), PG1 | 632,707<br>8,967 | 39% |
| | Corridor improvements: eastern end of Pulgas Creek | | | Corridor improvements: Old County Road (all) | | |
| Total | | 1,628,568 | 100% | | 1,628,568 | 100% |

Notes:
[1]All Buildings "B" are Office / R&D use unless amenity is specified. "PG" is parking use.
[2] Usable 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.

## COMPARISON AND SUMMARY OF CONCLUSIONS

Overall Summary

**Table 22.2** details the relationship of the revised project to impacts and mitigation measures from the Draft EIR. As demonstrated in the table, no new significant environmental impacts would result from the revised project that were not previously identified in the Draft EIR and there would be no substantial increase in the severity of previously identified significant environmental impacts.

None of the information in this chapter is considered "significant new information" as defined in State CEQA Guidelines Section 15088.5 as requiring recirculation of any part of the EIR.


**Figure 22.1: Revised Conceptual Site Plan**
Source: Applicant, January 2025

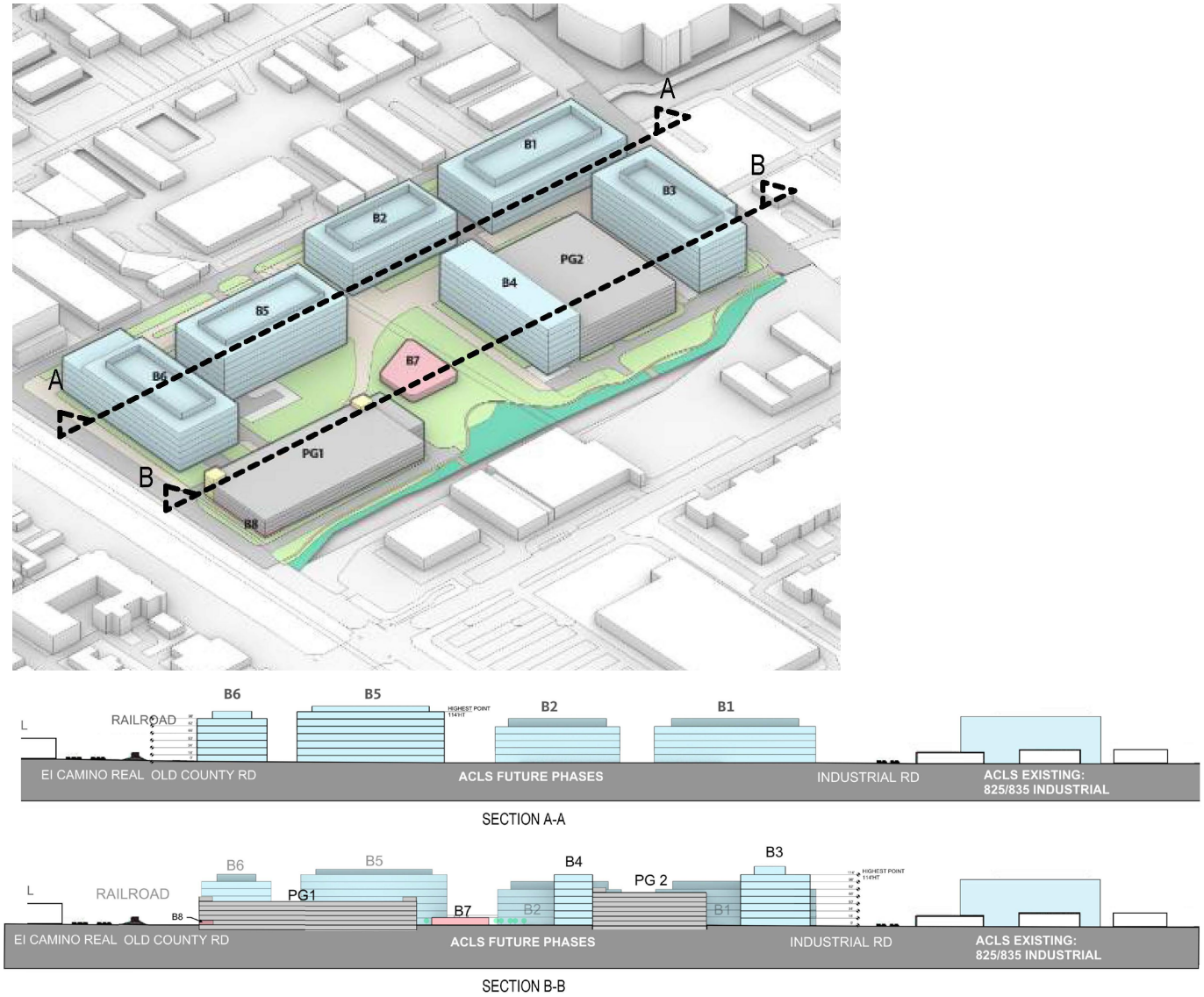
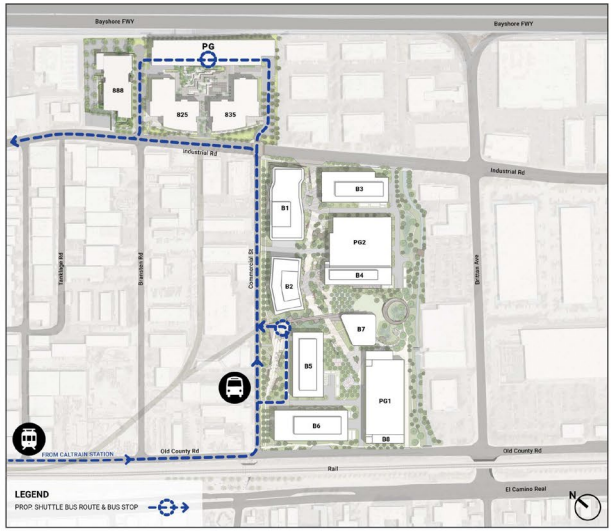
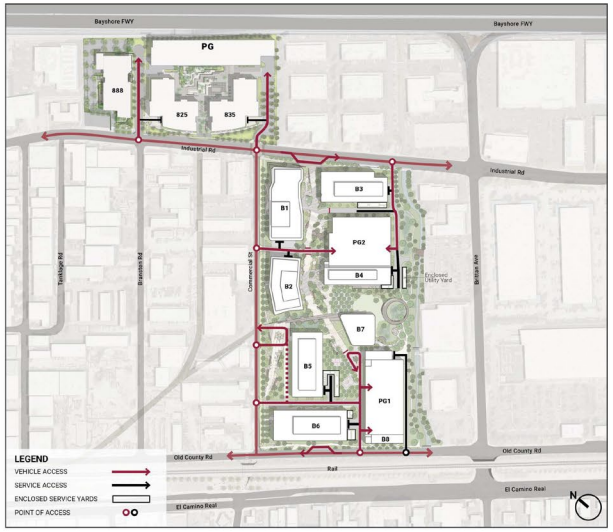



**Figure 22.2: Revised Conceptual Massing Model and Building Elevations**
Source: Applicant, November 2024

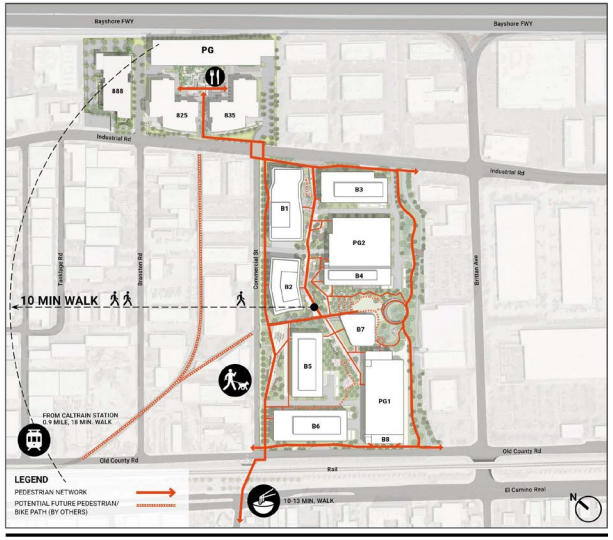



URBAN CONNECTION - PUBLIC TRANSPORTATION




URBAN CONNECTION - VEHICULAR CIRCULATION


URBAN CONNECTION - BICYCLE PATH




URBAN CONNECTION - PEDESTRIAN PATH

**Figure 22.3: Revised Conceptual Circulation Plan**
Source: Applicant, November 2024

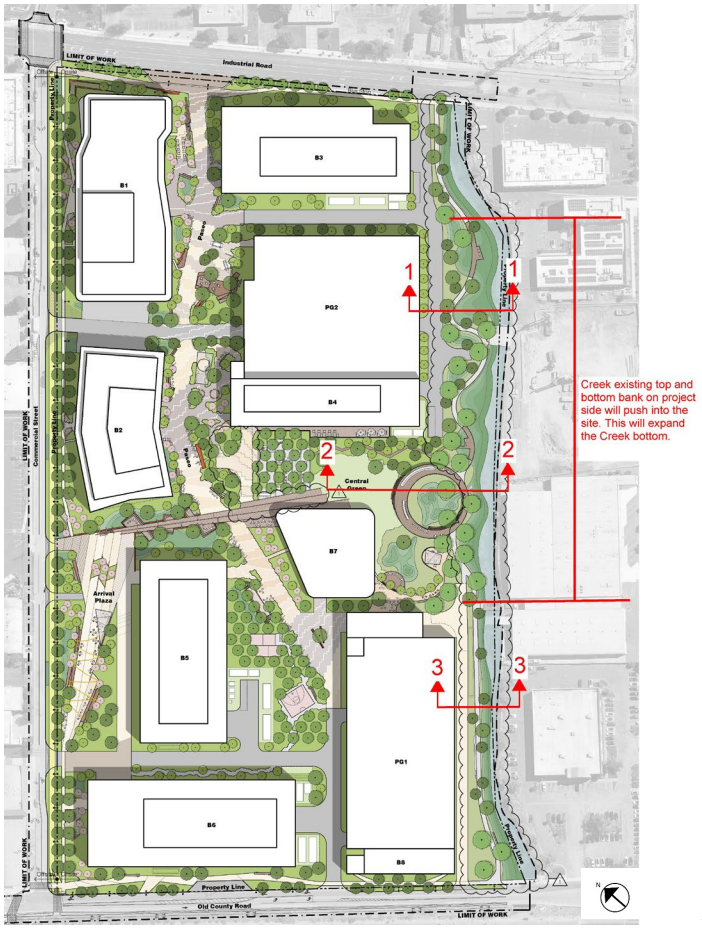



**Figure 22.4a: Conceptual Creek Section Locations**
Source: Freyer & Laureta, November 2024

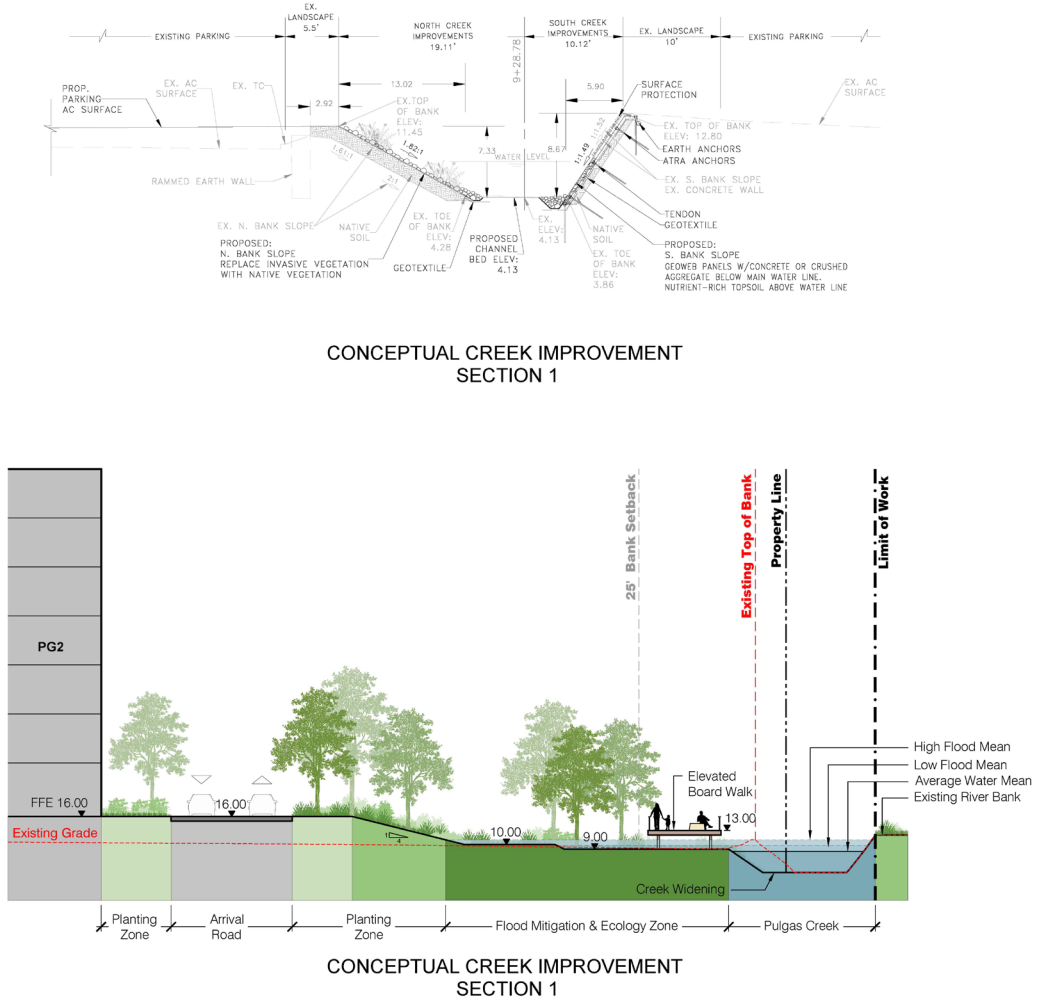



**Figure 22.4b: Conceptual Pulgas Creek Design Section 1**
Source: Freyer & Laureta, November 2024

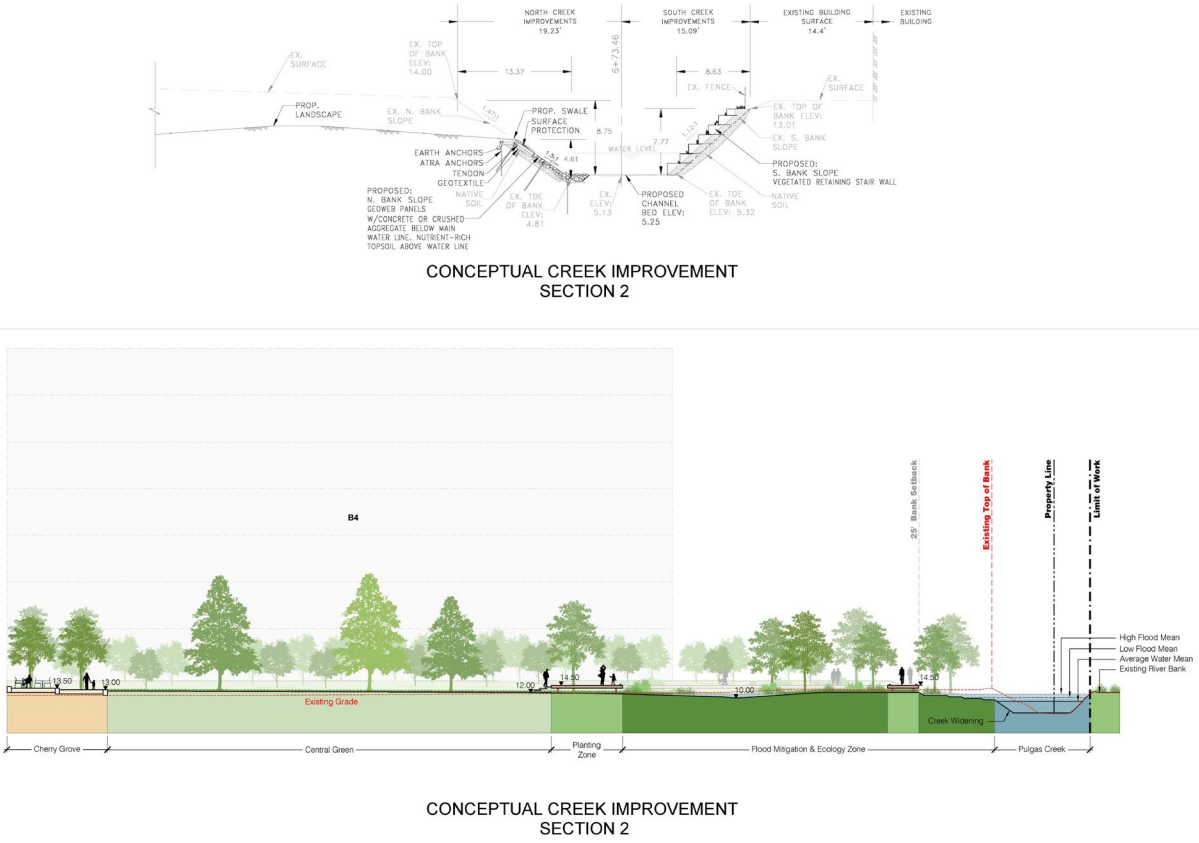



**Figure 22.4c: Conceptual Pulgas Creek Design Section 2**
Source: Freyer & Laureta, November 2024

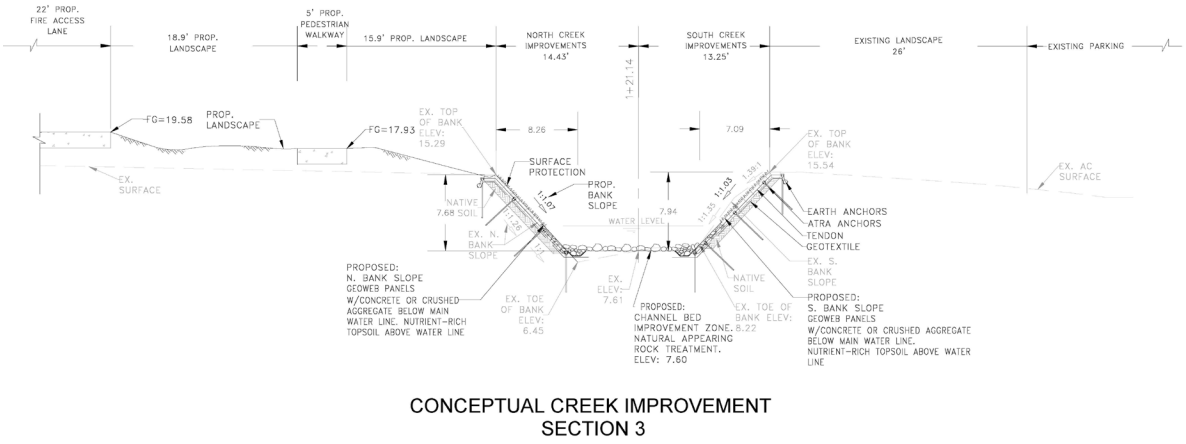



**Figure 22.4d: Conceptual Pulgas Creek Design Section 3**
Source: Freyer & Laureta, November 2024


**Figure 22.5: Revised Conceptual Phasing Plan**
Source: Applicant, January 2025

**Table 22.2: Original and Revised Project Impacts and Mitigation Measures**

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **AIR QUALITY** | | | | |
| Original Project Impact:<br>**Impact Air-1: Consistent with Bay Area 2017 Clean Air Plan**. The project would not obstruct or conflict with any of the primary goals of the Bay Area 2017 CAP and would support applicable control measures. This would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as original project. The revised project would support the same applicable control measures of the Bay Area 2017 CAP. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Air-2: Construction Period Dust and Emissions.** Construction activities would generate exhaust emissions from vehicles and equipment and fugitive dust particles that could affect local air quality. While the project emissions would be below threshold levels, the Bay Area Air Quality Management District (BAAQMD) considers dust generated by grading and construction activities to be a potentially significant impact associated with project development if uncontrolled and recommends implementation of construction management practices to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds. The project's impact on air quality due to construction would be *less than significant with mitigation*. | Yes | No | No | Less Than Significant |

| | | | | |
|---|---|---|---|---|
| Original Project Mitigation Measures:<br><br>**Air-2: Basic Construction Best Management Practices.** The project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Best Management Practices":<br>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.<br>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.<br>• All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.<br>• All vehicle speeds on unpaved roads shall be limited to 15 mph.<br>• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.<br>• All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.<br>• All trucks and equipment, including their tires, shall be washed off prior to leaving the site.<br>• Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.<br>• Publicly visible signs shall be posted with the telephone number and name of the person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints phone number shall also be visible to ensure compliance with applicable regulations.<br><br>Revised Project Impact:<br><br>Same as the original project. Construction by phase is still split into approximately the same proportions as the original project and, while proposed grading has increased by 52,669 cubic yards, the emissions analysis for the original project included a conservative estimate of 78,157 cubic yards net for each of the three phases (see CalEEMod results, section 1.3, in Appendix B of the Draft EIR), which remains a higher volume of grading than currently estimated and therefore a conservative analysis. Conclusions from the Draft EIR would remain valid for the revised project.<br><br>Revised Project Mitigation Measures:<br><br>MM Air-2 exactly as written for the original project. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br><br>**Impact Air-3: Operational Period Emissions.** Emissions from operation of the project, including site operations as well as mobile sources (e.g., employee vehicle trips) and stationary sources (e.g., emergency generators), could cumulatively contribute to air pollutant levels in the region. The project would have significant emissions of the ozone precursor pollutant reactive organic gasses (ROG) during operations. Mitigation Measure Air-3 would reduce ROG emissions such that the impact would be *less than significant with mitigation*.<br>Original Project Mitigation Measures:<br><br>**Air-3: Require Use of Super-Compliant VOC Coatings to Reduce Operational ROG Emissions.** The project shall use super-compliant volatile organic compound (VOC, i.e., ROG) coatings that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3: Architectural Coatings last amended in July 2009) for at least 90 percent of all interior and exterior paints for the lifetime of the project. At least 90 percent of coatings applied must meet a "super-compliant VOC standard of less than 10 grams of VOC per liter of paint, which achieves the required reduction. This mitigation measure applies to 90 percent of coatings since there may be some special coatings required for certain aspects of the project that cannot meet this requirement.<br>Revised Project Impact:<br><br>Same as the original project. The overall square footage of the project did not increase, and construction by phase is still split into approximately the same proportions as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br><br>MM Air-3 exactly as written for the original project. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br><br>**Impact Air-4: Exposure of Sensitive Receptors**. During construction activities, the project could expose sensitive receptors to substantial pollutant concentrations from construction-related emissions. Specifically, | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| the project's construction emissions could cause an excess cancer risk level exceeding 10 in one million at the maximally exposed sensitive receptor. Impacts from operational activities also contribute to the cancer risk level exceeding 10 per million, but to a much smaller degree than the construction impacts. With implementation of construction-period exhaust emission reduction, the impact would be *less than significant with mitigation*.<br>Original Project Mitigation Measures:<br>**Air-4: Construction Period Exhaust Emissions Reduction**. The project shall use construction equipment that has low diesel particulate matter (DPM) exhaust to minimize cancer risk and annual fine particulate matter (PM2.5) concentrations, which shall include either A or B below:<br>A. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards. In rare cases where the use of Tier 4 equipment is not specifically available, alternatively:<br>i. Use equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 70 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; and/or<br>ii. Use electrical or non-diesel fueled equipment.<br>B. Alternatively, the applicant can develop a plan that reduces on- and near-site diesel particulate matter emissions by 70 percent or greater. Such a plan would have to be supported by an air quality analysis from a qualified air quality consultant and reviewed and approved by the City.<br>Revised Project Impact:<br>Same as the original project. The overall square footage of the project did not increase, and construction by phase is still split into approximately the same proportions as the original project. While grading has increased by 52,669 cubic yards, the emissions analysis for the original project included a conservative estimate of 78,157 cubic yards net for each of the three phases (see CalEEMod results, section 1.3, in Appendix B of the | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Draft EIR). The new grading plan would be less than what was analyzed. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MM Air-4 exactly as written for the original project. | | | | |
| **BIOLOGICAL RESOURCES** | | | | |
| Original Project Impact:<br>**Impact Bio-1: Disturbance of Nesting Birds**. The removal of trees and shrubs during the February 1 to August 31 breeding season could result in the destruction of active nests or cause a disturbance that leads to nest abandonment. This could include but is not limited to species of special concern. This impact is *less than significant with mitigation*.<br>Original Project Mitigation Measures:<br>**Bio-1: Pre-Construction Nesting Bird Survey**. Initiation of construction activities during the avian nesting season (February 1 through August 31) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction nesting bird surveys for each construction phase shall be conducted by a qualified biologist within 14 days before initial ground disturbance or vegetation removal for such construction phase to avoid disturbance to active nests, eggs, and/or young of nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish & Game Code. Surveys shall encompass the entire construction phase area and the surrounding 100 feet. An exclusion zone where no construction would be allowed shall be established around any active nests of any protected avian species found in the project site 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 shall be at the discretion of the biologist (typically 300 feet for raptors and 100 feet for other species). These surveys would remain valid as long as construction activity is consistently occurring in a given area and shall be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting bird season. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Impact:<br>The revised project would have the same potential to impact nesting birds. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MM Bio-1 exactly as written for the original project. | | | | |
| Original Project Impact:<br>**Impact Bio-2: Bird Collisions**. While the proposed development would add structures that could present a risk of bird collisions as they travel across the site between surrounding habitats, the specific design of the proposed structures, including the lack of extensive glazing elements, would minimize this risk below levels where it could substantially impact sensitive species. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. A revised bird-safe design analysis was completed for the architectural design changes of the buildings. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Bio-3: No Loss of Valuable Riparian Habitat**. Current conditions along the banks of Pulgas Creek on the project site do not contain a sensitive vegetation community or high habitat value. This is a *less than significant* impact. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project with no sensitive vegetation community on or near the project site. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Bio-4: Indirect Impacts on Wetlands**. While no wetlands occur on the project site, project activities could result in temporary and permanent effects on a Perennial Stream and jurisdictional waters. This impact would be *less than significant with mitigation.*<br>Original Project Mitigation Measures:<br>**Bio-4a: Protect Pulgas Creek from Construction Debris and Runoff**. Applicant shall implement the following measures to reduce construction-related impacts to Pulgas Creek:<br>a. During construction above the top of bank, orange construction fencing backed by silt fencing and wildlife-friendly hay wattles (no monofilament netting) shall be installed along the banks of Pulgas Creek to prevent equipment from entering protected areas and to prevent fuels, lubricants, soils, de minimis fill, and other pollutants from impacting Pulgas Creek.<br>b. Construction below the top of bank shall be completed with equipment staged above the top of bank to the greatest extent feasible. If operation of small equipment below the top of bank is required, that work shall be completed in a dewatered condition and all construction debris and equipment shall be removed from the channel before returning flow to the dewatered area. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| c. Pill control absorbent material, for use beneath stationary equipment, shall be present on-site and available at all times. Any hazardous chemical spills shall be cleaned immediately.<br>d. All stockpiling of construction materials, equipment, and supplies, including storage of chemicals such as fuel, oil or other substances that could adversely affect aquatic resources, shall occur outside Pulgas Creek and surrounding riparian areas. No equipment shall be washed where runoff could enter the channel.<br>e. All refueling and maintenance of equipment, other than stationary equipment, shall occur outside the channel's top-of-bank.<br>f. All construction debris shall be gathered on a regular basis and placed in a dumpster or other container that is emptied or removed at least on a weekly basis.<br>g. At the end of each workday, areas of the project site that are under construction must be inspected, cleaned and secured against potential erosion, dumping, or discharge to the creek, street, gutter, or storm drains.<br>h. The applicant shall comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ) adopted by the SWRCB by preparing and implementing a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the requirements of the General Permit. The SWPPP must include best management practices (BMPs) specific to project construction and is subject to inspections by a Qualified Stormwater Practitioner (as defined in Order No. 2022-0057-DWQ). BMPs aim to control degradation of surface water by preventing soil erosion or pollution discharge from the project area.<br>These requirements shall be superseded by any conflicting and more stringent requirements set forth in any Lake or Streambed Alteration Agreement, Section 404 permit, or Section 401 water quality certification issued for the project.<br><br>**Bio-4b: Implement a Dewatering and Diversion Plan.** The project applicant shall submit a Dewatering and Diversion Plan for review and approval by the City Engineer to mitigate impacts to Pulgas Creek | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| during dewatering, and shall implement the approved Plan. The Plan shall comply, at a minimum, with the following:<br>a. All dewatering and diversion activities shall comply with the requirements of all necessary regulatory permits and authorizations from other agencies (e.g., Regional Water Quality Control Board [RWQCB], California Department of Fish and Wildlife [CDFW], U.S. Fish and Wildlife Service [USFWS], and Army Corps of Engineers [USACE]).<br>b. All native aquatic life (e.g., fish, amphibians, and turtles) within areas to be dewatered shall be relocated by a qualified biologist prior to dewatering, in accordance with applicable regional, state, and federal requirements. The biologist shall check daily for stranded aquatic life until the area is dewatered. All reasonable efforts shall be made to capture and move all stranded aquatic life observed in the dewatered areas. Capture methods may include fish landing nets, dip nets, buckets, and by hand. Captured aquatic life shall be released immediately in the nearest appropriate downstream site. This mitigation measure does not authorize the take or disturbance of any state or federally listed species unless the applicant obtains a project-specific authorization from the CDFW and/or the USFWS, as applicable.<br>c. If any temporary dam or other artificial obstruction is constructed to facilitate the proposed improvements, maintained, or placed in operation within the stream channel, the applicant shall ensure that sufficient water to maintain native aquatic life below the temporary dam or other artificial obstruction is allowed to pass down channel at all times.<br>d. Construction and operation of dewatering/diversion devices shall meet the standards contained in the latest edition of the Erosion and Sediment Control Field Manual published by the RWQCB.<br>e. Coffer dams and/or water diversion system shall be constructed of a non-erodible material that will cause little or no siltation, such as encased sandbags, gravel bags, or inflatable bladders. Coffer dams and the water diversion system shall be maintained in place and functional throughout construction in the channel. If the coffer dams or water diversion systems fail, they shall be repaired immediately based on the recommendations of a qualified civil engineer in consultation with a qualified biologist. The devices shall be removed after construction is complete and the site is stabilized. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| f. Water pumped from the dewatered area shall be passed through a sediment settling device before returning to the stream channel. Velocity dissipation measures or devices are required at the outfall to prevent erosion.<br>These requirements shall be superseded by any conflicting and more stringent requirements set forth in any LSAA, Rivers and Harbors Act Section 10 authorization, Section 404 permit, or Section 401 water quality certification issued for the project.<br><br>**Bio-4c: No Net Loss of Ecological Conditions**. Prior to any work in or on the bed or bank of Pulgas Creek, the applicant shall submit to CDFW a Lake or Streambed Alteration (LSA) notification pursuant to Fish and Game Code section 1602. The Applicant shall comply with all requirements of any LSAA issued for the project, including any compensatory mitigation requirements. If CDFW issues an LSAA for the project, a copy of the fully executed LSAA shall be submitted to the City prior to initiation of any work impacting riparian habitats or Pulgas Creek.<br>For unavoidable placement of fill in jurisdictional waters, Applicant shall ensure compliance with the Porter-Cologne Water Quality Control Act, Section 404 of the CWA, and Rivers and Harbors Act Section 10, as applicable. Section 404 and Section 10 compliance may be accomplished by complying with the terms of any applicable Nationwide Permit, Regional General Permit, USACE-issued letter of permission or an individual permit. Applicant shall apply for a Section 401 water quality certification (permit) and waste discharge requirements (as applicable) from the San Francisco RWQCB as necessary and shall comply with any conditions or stipulations included in any Rivers and Harbors Act Section 10, Section 404 and 401 permits and waste discharge requirements and authorizations issued for the project.<br>If work within Pulgas Creek results in a permanent net loss of aquatic resources, the Applicant shall provide mitigation to offset this impact, either through (1) the creation, enhancement, or restoration of aquatic resources onsite or off-site in an appropriate location or (2) through the purchase of mitigation credits from a USACE, RWQCB, or CDFW approved mitigation bank. The purchase of such credits shall serve as full mitigation for impacts. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| credits from a USACE, RWQCB, or CDFW approved mitigation bank. The purchase of such credits shall serve as full mitigation for impacts.<br>If project-specific creation, enhancement, or restoration of aquatic resources is implemented, these resources shall be restored, enhanced, or created at a minimum ratio of 1:1 (compensation: impact) on an acreage basis or such greater amount as otherwise required by any state or federal permitting agencies, and at a location approved by the City or as otherwise required by any state or federal permitting agencies. A qualified biologist shall develop a mitigation and monitoring plan that includes the following components (or as otherwise modified by regulatory agency permitting conditions):<br>• Summary of habitat impacts and mitigation acreage requirements to meet the required mitigation ratio;<br>• Goal of the restoration to achieve no net loss of habitat functions and values;<br>• Location of mitigation site(s) and description of existing site conditions;<br>• Mitigation design:<br>o Existing and proposed site hydrology;<br>o Grading plan, if appropriate, including bank stabilization or other site stabilization features;<br>o Planting plan;<br>o Remedial measures and adaptive management; and<br>• Monitoring plan, including success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Success criteria shall include quantifiable measurements of riparian and aquatic vegetation type (e.g., dominance by natives), the appropriate extent for the restoration location, and the provision of ecological functions and values equal to or exceeding those ~~in the~~ affected by the project. At a minimum, success criteria shall include following:<br>o At Year 5 post-mitigation, total cover or survivorship (as applicable based on mitigation design) by planted native vegetation shall be at least 75 percent.<br>The mitigation and monitoring plan must be approved by the City and other applicable agencies prior to the creek impacts and must be implemented within 1 year after the discharge of fill into the creek. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Prior to issuance of any City permits for construction, grading, or other site-disturbing activities with the potential to impact Pulgas Creek and surrounding riparian habitat, the Applicant shall provide proof to the City that any necessary permits and authorizations from the USACE, RWQCB, and CDFW have been obtained.<br>Revised Project Impact:<br>Same as the original project. While the details of the rehabilitation of Pulgas Creek have been revised, the goals and requirements are the same as with the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MMs Bio-4a and Bio-4b exactly as written for the original project, and MM Bio-4c as revised in Chapter 23 and shown above, are appliable to the revised project with no additional revisions. | | | | |
| Original Project Impact:<br>**Impact Bio-5: Tree Removal**. The proposed development as well as vegetation management activities would result in the removal of 92 trees, some of which qualify as "Significant Trees" under the City's Municipal Code. However, the applicant is required to comply with the City's regulations, including the need for permits and payment of fees as appropriate and would therefore not conflict with local policies. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project and would remove the same trees. The revised project would be required to comply with the same City regulations as the original project. The revised project would plant 306 trees during Phase 1, and more than 500 trees overall. Conclusions from the Draft EIR would remain valid for the revised project. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Mitigation Measures:<br>None recommended. | | | | |
| **CULTURAL RESOURCES** | | | | |
| Original Project Impact:<br>**Impact Culture-1: Removal of Historic Age Structures**. Construction activities include demolition of structures over 50 years old. However, historic assessment concluded that these structures would not be eligible for listing as historic resources and therefore the impact with respect to removal of historic age buildings would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project and would remove the same existing buildings as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Culture-2: Unanticipated Discovery of Archaeologic Resources**. During ground disturbing activities associated within the project site, it is possible that currently unidentified historic- or pre-historic-period archaeological resources could be discovered and disturbed. This impact is *less than significant with mitigation.*<br>Original Project Mitigation Measures: | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **Culture-2a: Worker Training**. Project supervisors, contractors, and equipment operators shall participate in an Archaeological and Tribal Cultural Resource Awareness Training, conducted by a Secretary of Interior-qualified archaeologist, to become familiar with the type of artifacts and features that could be encountered during project-related ground disturbing activities, as well as the procedures to follow if cultural resources are unearthed during construction.<br><br>**Culture-2b: Halt Construction Activity, Evaluate Find and Implement Mitigation**. If archaeological or tribal cultural resources are encountered during excavation or construction, construction personnel shall immediately suspend all activity within 50 feet of the suspected resources and the City and a licensed archaeologist shall be contacted to evaluate the situation, including determine the significance of the find. If the find is potentially significant, the find shall be avoided if feasible. If avoidance is infeasible, then specific and appropriate measures that can be implemented to protect the find, in accordance with section 21083.2 of the California Public Resources Code, such as preservation in place, capping, planned open space, or data recovery, shall be required. Work near the find can resume when a licensed archeologist, in conjunction with the City, has determined that such work no longer could adversely affect the find.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, and while the revised grading plan has increased overall import an additional 52,669 cubic yards compared to the original project, the amount of soil being cut has decreased from 15,466 cubic yards to 3,103 cubic yards, indicating a decrease in ground disturbance. The revised project would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MMs Culture-2a and Culture-2b exactly as written for the original project. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br>**Impact Culture-3: Unanticipated Discovery of Human Remains**. During ground disturbing activities associated within the project site, it is possible that currently unidentified human remains could be discovered and disturbed. The project would be required to comply with applicable regulations of the California Health and Safety Code specifying appropriate handling of human remains and this impact is *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, and while the revised grading plan has increased overall import an additional 52,669 cubic yards compared to the original project, the amount of soil being cut has decreased from 15,466 cubic yards to 3,103 cubic yards, indicating a decrease in ground disturbance. The revised project would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| **ENERGY** | | | | |
| Original Project Impact:<br>**Impact Energy-1: Increased Energy Consumption.** The project would have an incremental increase in the demand for energy given the increase in development on the project site compared to existing conditions. However, the project would be more energy efficient than the existing buildings and would not violate applicable federal, state and local statutes and regulations relating to energy standards. Additionally, development at the project site is required to meet or exceed applicable energy efficiency standards. The project would have a *less than significant* impact related to energy. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact<br>Same as the original project. The revised project would be approximately the same size, have the same operations, and meet the same energy efficiency standards as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Energy-2: Consistency with Plans for Renewable Energy and Energy Efficiency.** The project would not conflict with a State or local plan for renewable energy or energy efficiency. The project would have a *less than significant* impact relating to consistency with energy-related plans.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revisions to the project would not affect the project's consistency with Title 24 or the City of San Carlos CMAP nor impede implementation of California's renewable energy goals. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **GEOLOGY AND SOILS** | | | | |
| Original Project Impact:<br>**Impact Geo-1: Seismic Ground Shaking**. There is a high probability that the proposed development would be subjected to strong ground shaking from an earthquake during its design life. The project would be required to comply with a Design-level Geotechnical Investigation and Structural Design Plans per standard conditions and the impact of the project with respect to strong seismic ground shaking would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project and would be required to comply with the same standard condition of approval "Design-Level Geotechnical Investigation and Structural Design Plans". Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Geo-2: Seismic Ground Failure, including Liquefaction, Densification, and Differential Settlement.** Site-specific analysis has determined that soils at the site have potential for liquefaction, and there is a low potential for densification (seismic settlement/saturated sand shaking) or lateral spreading to occur at the site. The project would be required to comply with a Design-level Geotechnical Investigation and Structural Design Plans per standard conditions and the impact of the project in this context would be *less than significant*. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, on the same soils and would be required to comply with the same standard condition of approval "Design-Level Geotechnical Investigation and Structural Design Plans". Conclusions from the Draft EIR would remain valid for the revised project<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Geo-3: Seismically-induced Landslides**. Site-specific analysis has determined that the slope of Pulgas Creek at the project site is stable. The impact of the project with respect to seismically induced landslides would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project and would not have an increased impact in regard to seismically-induced landslides. Conclusions from the Draft EIR would remain valid for the revised project<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br>**Impact Geo-4: Soil Erosion**. Grading and other construction activities would be required to comply with local regulations, and soil erosion after construction would be controlled with approved landscape plans. This would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project and would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Geo-5: Unstable Geologic Unit**. The project site was found to have settlement potential of several inches to several feet under the weight of new fill and project buildings. The project would be required to comply with a Design-level Geotechnical Investigation and Structural Design Plans per standard conditions and the project's impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, on the same soils and would be required to comply with the same standard condition of approval "Design-Level | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Geotechnical Investigation and Structural Design Plans". Conclusions from the Draft EIR would remain valid for the revised project<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Geo-6: Potentially Expansive Soils.** The project site was found to have moderate to high expansion potential of existing near surface soils that can be susceptible to substantial differential movement resulting in damage to structures, concrete slabs, retaining walls, pavements, sidewalks and other improvements. The project's impact with respect to expansive soils would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, on the same soils and would be required to comply with the same standard condition of approval "Design-Level Geotechnical Investigation and Structural Design Plans". Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Geo-7: Paleontological Resources**. During ground disturbing activities associated within the project site, it is possible that currently unidentified paleontological resources could be discovered and disturbed. This impact would be *less than significant with mitigation*. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>**Geo-7: Halt Excavation, Evaluate Find and Implement Mitigation**. Should any unknown fossils or fossil-bearing deposits be discovered during grading, trenching, or other on-site excavation(s), earthwork within 50 ft of these materials shall be stopped until a qualified paleontologist has an opportunity to document the find as needed (in accordance with Society of Vertebrate Paleontology standards [Society of Vertebrate Paleontology 1995]), evaluate the potential significance of the resource under the criteria set forth in CEQA Guidelines Section 15064.5, and notify the appropriate agencies to determine the procedures that would be followed before construction activities would be allowed to resume at the location of the find. If avoidance is not feasible, the paleontologist shall prepare an appropriate excavation plan to mitigate the effect of project construction on the find, subject to review and approval by the City prior to implementation, and all construction activity shall adhere to the recommendations in the excavation plan.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in the same location as the original project, would generally have the same ground disturbing activities, and would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MM Geo-7 exactly as written for the original project. | | | | |
| **GREENHOUSE GAS EMISSIONS** | | | | |
| Original Project Impact:<br>**Impact GHG-1: Increased GHG Emissions.** Construction and operation of the proposed project would be additional sources of Greenhouse Gas (GHG) emissions, primarily through consumption of fuel for transportation and energy usage on an ongoing basis. However, the GHG emissions level would be below applicable significance thresholds and would therefore be a *less than significant* impact.<br>Original Project Mitigation Measures: | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is the same size as the original project, with the same demolition and substantially the same construction techniques and timing, and would be below the same significance thresholds as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact GHG-2: Compliance with GHG Reduction Plans.** The project would be compliant with applicable measures of the Clean Air Plan, Plan Bay Area 2050 and the City of San Carlos' Climate Mitigation and Adaptation Plan, and would therefore be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revisions to the project would not affect the project's compliance with the applicable GHG reduction plans. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **HAZARDS AND HAZARDOUS MATERIALS** | | | | |
| Original Project Impact:<br>**Impact Haz-1: Routine Use of Hazardous Materials**. With compliance with applicable regulations, the project would not expose employees, the nearby public, or the environment to significant hazards due to the routine transport, use, disposal, or storage of hazardous materials (including chemical, radioactive and biohazardous waste). This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would have the same construction and operational impacts and would comply with the same regulations as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Haz-2: Accidental Release of Hazardous Materials.** Portions of the project site contain contaminated soil and groundwater from historical uses. Demolition of existing buildings during construction could expose the public or construction workers to hazardous materials. The impact related to accidental release of hazardous materials would be *less than significant with mitigation.*<br>Original Project Mitigation Measures:<br>Mitigation Measure Haz-2a is revised to respond to comments from the Department of Toxic Substances Control in Chapter 23. The revisions provide more detail regarding the precise laws and regulations applicable to the project, including for imported fill. DTSC's comments do not raise concerns regarding new | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion: Impact / Measures Remain Applicable? | Impact Discussion: New or Substantially Increased Impact? | Impact Discussion: New or Revised Measure? | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| significant impacts; instead, the clarifications made in response to DTSC's comments clarify the existing applicable regulatory regime for hazardous materials. Added text is underlined:<br><br>**Haz-2a: Compliance with ~~Removal Action Workplan,~~ Groundwater Remedial Action Plan, Soil and Fill Testing, and Regulatory Agency Requirements.**<br><br>The applicant shall demonstrate proposed compliance with agency requirements related to known contamination in the soil, groundwater, and vapor~~, including the Removal Action Workplan and Groundwater Remedial Action Plan,~~ prior to initiation of construction activities and shall demonstrate compliance with any agency-required post-construction requirements prior to occupancy. ~~The~~ A Groundwater Remedial Action Plan associated with ~~covers~~ the former Kelly Moore portion of the project site that included investigation and remediation activities has been implemented and completed, except for ongoing, routine groundwater monitoring. ~~and includes the following:~~<br><br>~~• Installation and monitoring of three shallow groundwater monitoring wells in the central part of the impacted area.~~<br><br>~~• Continued groundwater monitoring of the existing site groundwater monitoring well network in the southeastern area.~~<br><br>~~• Groundwater remediation.~~<br><br>~~• Evaluation of vapor intrusion mitigation measures for the three future occupied buildings on the former Kelly Moore sites.~~<br><br>In areas of the project site not included in the Groundwater Remedial Action Plan, if requested by the California Regional Water Quality Control Board, San Francisco Bay Region (SFRWQCB), further investigation for contamination shall be conducted. Contaminated soil or groundwater shall be handled per regulatory agency requirements. Soil imported onto the site for use as fill shall be evaluated in accordance with applicable regulatory guidance. A record of import fill sources and testing will be maintained as part of project records and provided to the SFRWQCB and the City. | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Mitigation Measure Haz-2b is revised to respond to DTSC's request to provide more detail related to commonly encountered hazardous materials when demolishing older buildings, as stated in Chapter 23. As the Draft EIR stated, the project already would have been subject to all applicable hazardous waste rules and regulations, and therefore this clarification of the list of commonly encountered materials in older buildings does not raise a new significant impact. Added text is underlined, deleted text is noted by ~~strikethrough~~:<br><br>**Haz-2b: ~~Lead-Based Paint, Asbestos, and Mold~~ Hazardous Building Materials Abatement.** Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials, ~~and~~ lead-based paint, mercury, and polychlorinated biphenyl caulk, and during demolition, any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.<br><br>Revised Project Impact:<br><br>Same as the original project. The revised project is in the same location as the original project and would therefore disturb the same soils and demolish the same buildings as the original project plan set. Conclusions from the Draft EIR would remain valid for the revised project.<br><br>Revised Project Mitigation Measures:<br><br>MMs Haz-2a and Haz-2b, as revised in Chapter 23 and shown above, are applicable to the revised project with no additional revisions. | | | | |
| Original Project Impact:<br><br>**Impact Haz-3: Development within Airport Land Use Plan Boundaries**. The proposed project is located within the Airport Land Use Plan boundaries of San Carlos Airport, but the project would comply with applicable regulations including required consultation with the Federal Aviation Administration prior to construction and would not result in a safety hazard for people residing or working at the project site. This impact would be *less than significant*. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is in the same location as the original project and would therefore remain within the Airport Land Use Plan boundaries of San Carlos Airport. While the heights of the individual buildings have been revised from the original project plan set, no buildings are proposed to be a greater height than the tallest of the original buildings, and therefore would not have a more substantial impact than the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Haz-4: Temporary Construction Obstructions.** The proposed project would not result in permanent changes to the roadway system or otherwise result in changes to area emergency response or evacuation plans. No substantial construction-period roadway obstruction is planned and any temporary construction obstructions would follow appropriate procedures. This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as or marginally reduced from the original project. The revised project is the same size and in the same location as the original project and would follow the same procedures if roadway obstruction occurs during construction, however, the currently empty portion of the project site would remain empty or as a surface parking lot until Phase 3 in the revised project and would be used for construction staging for the first two | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| phases, potentially reducing instances of roadway obstruction. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| **HYDROLOGY AND WATER QUALITY** | | | | |
| Original Project Impact:<br>**Impact Hydro-1: Potential for Contaminated Runoff.** Runoff can carry sediment and contamination from the site if not properly controlled and treated. Project activities would be required to follow an approved SWPPP to prevent contaminated runoff from entering Pulgas Creek for both the construction phase and on-going operation of the project. Design requirements would address the increased erosion potential caused by construction activities and increased runoff that could result in the sedimentation of receiving waters. This would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is in the same location as the original project and would be in compliance with the same requirements for an SWPPP. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br>**Impact Hydro-2: No Substantial Effect on Groundwater**. The project involves redevelopment of a fully-developed site and would not directly utilize groundwater. Project construction and operation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. This would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is the same size and in the same location as the original project and would have the same level of impact on groundwater. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Hydro-3: Potential for Erosion and Siltation**. Erosion and siltation can occur during construction activities and along creeks. The project's preparation and implementation of a Stormwater Control Plan and Stormwater Facility Operation and Maintenance Plan, as well as stabilizing the banks of Pulgas Creek, would reduce the potential for erosion or siltation. This impact would be *less than significant with mitigation*.<br>Original Project Mitigation Measures:<br>**Mitigation Measures Bio-4a and Bio-4b** detailed in Chapter 6: Biological Resources would be applicable to Impact Hydro-3 as well. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Impact:<br>Same as the original project. The revised project is in the same location as the original project and would be in compliance with the same statutes and regulations. Details of the bank stabilization plan for Pulgas Creek have been revised but would have the same impact on the potential for erosion and siltation. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>MMs Bio-4a and Bio-4b exactly as written for the original project. | | | | |
| Original Project Impact:<br>**Impact Hydro-4: Need to Control Runoff and Flood Flows.** Much of the project site is located in a flood zone and subject to periodic seasonal flooding from Pulgas Creek. Redevelopment of the site would alter on-site drainage patterns, but the project has been designed to protect on-site development without exacerbating off-site flooding conditions. This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. While the project site plan and the design of flood control have been revised, flood analysis reports show that the revised plans would protect on-site development without exacerbating off-site flooding conditions (see Appendix K). Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br>**Impact Hydro-5: Contribute to the Stormwater System.** Redevelopment of a site can result in changes to runoff and use of stormwater system capacity. With compliance with applicable regulations and implementation of the proposed on-site stormwater system, the project would not increase flows to the off-site stormwater system. This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size as the original project and would be in compliance with the same regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Hydro-6: Development within a Flood Hazard Zone.** Much of the project site is located in a flood hazard zone. However, the project includes features to reduce the risk of on-site flooding and related risk of pollutant release. This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Impact:<br>Same as or marginally reduced from the original project. The revised project is in the same location, but the revised grading plan would raise the project buildings further above potential flood levels. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Hydro-7: Compliance with Water Plans.** Construction and operation of the project would follow all required water quality and groundwater management regulations. This impact would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| **NOISE AND VIBRATION** | | | | |
| Original Project Impact:<br>**Impact Noise-1: Temporary Construction Noise**. Existing noise-sensitive land uses would be exposed to temporary noise due to project construction activities, but these would not exceed levels expected to cause | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| adverse community reaction and would not represent a substantial increase over ambient noise levels. This is a *less than significant* temporary noise impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size and in the same location as the original project and would involve generally the same construction activities. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Noise-2: Permanent Noise Level Increase**. The proposed project would result in permanently increased ambient noise levels, but the increases would not be substantial at the noise-sensitive receptors in the project vicinity and operational noise levels generated by the proposed project would not exceed applicable standards established by the City of San Carlos. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size as the original project and in the same location. There would be no change in the operational noise level from that analyzed for the original project. Conclusions from the Draft EIR would remain valid for the revised project. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Noise-3: Exposure to Groundborne Vibration.** Office and/or R&D uses are not a source of substantial operational vibration and construction-related vibration levels at the project site would not exceed 0.3 in/sec PPV at the existing structures. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is in the same location as the original project and would not require construction equipment that has the potential to create stronger vibrations than for the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Noise-4: Excessive Aircraft Noise.** The project site is located approximately 1000 feet from San Carlos Airport and approximately 9 miles from San Francisco International Airport. The noise environment attributable to aircraft from both these airports is considered normally acceptable for the proposed commercial use. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Impact:<br>Same as the original project. The revised project is in the same location as the original project and would therefore remain the same distance from the airport. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| **POPULATION AND HOUSING** | | | | |
| Original Project Impact:<br>**Impact Pop-1: Induce Indirect Population Growth**. The project would result in increased employment opportunities and therefore contribute to indirect population growth. However, the project is identified in and/or consistent with relevant City and regional plans. The project's impact related to substantial unplanned population growth would be a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size as the original project and would generate the same employment opportunities. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **TRANSPORTATION** | | | | |
| Original Project Impact:<br><br>**Impact Trans-1: Increased Demand for Transit, Bicycle, and Pedestrian Facilities.** The project would improve pedestrian and bicycle facilities at the site and while it would result in increased use of bicycle, pedestrian, transit, and roadway facilities, it would not conflict with applicable plans and policies. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br><br>No mitigation warranted.<br>Revised Project Impact:<br><br>Same as the original project. While the site plan and construction phasing have been revised, the project would complete the same off-site circulation improvements as the original project and would not conflict with applicable plans and policies. Conclusions from the Draft EIR would remain valid for the revised project.<br><br>The transportation specialists for the Draft EIR, W-Trans, reviewed the details of the revised project, including the timing of the pedestrian and bicycle improvements with implementation of the Old County Road separated bikeway along the project's frontage in Phase 3. Consistent with conclusions in the Draft EIR, overall improvements in all phases are consistent with applicable plans and policies and would not result in significant environmental impacts.<br>Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br><br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Impact:<br><br>**Impact Trans-2: Vehicles Miles Traveled.** The VMT per project employee would exceed the City's adopted threshold of 15 percent below the Countywide average if employee trips were not reduced. With successful implementation of a TDM program, the VMT per employee would be brought more than 15 percent below the Countywide average. This impact is *less than significant with mitigation*.<br><br>Original Project Mitigation Measures:<br><br>**Trans-2: Implementation of Transportation Demand Management Program for Vehicle Miles Traveled Reduction.** A TDM Plan shall be prepared prior to any building occupancy that includes a description of the TDM measures listed in Municipal Code section 18.25.040 to be implemented such that it achieves the required 20% trip reduction on a daily, AM peak hour, and PM peak hour basis, and reduces VMT per service population (total employee count) to 14.5 or lower, and includes, at a minimum, the following elements:<br>1. The project applicant will designate an on-site Transportation Coordinator that will be responsible for implementation of the TDM Plan, including providing relevant TDM trip reduction and program information to all employees on site, and arranging for independent annual monitoring and employee surveys.<br>2. The project applicant and the project's Transportation Coordinator will be responsible for ensuring that the TDM Plan is implemented each year and an annual monitoring report is submitted to the City of San Carlos.<br>3. The Transportation Coordinator shall facilitate a site inspection by City staff to confirm that all approved physical measures in the project's TDM Plan have been implemented and/or installed prior to the first and any subsequent certificates of occupancy that include physical TDM features or as a part of annual monitoring if new physical TDM features have been indicated in the plan since the last site inspection.<br>4. The TDM Plan monitoring will be conducted per Municipal Code Section 18.25.080. Annual reporting of the effectiveness of the measures will verify if the implemented TDM measures are effective and | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| achieving the vehicle trip and VMT reduction goals. As required by Section 18.25.080, a five-year review shall evaluate the overall effectiveness of all of the TDM activities and may suggest new or modified activities or substitute activities to meet the program's objectives, per the Community Development Director's review and approval. The Director may impose reasonable changes to assure the program's objectives will be met.<br>5. Consistent with common traffic engineering data collection principles, to ensure that trip reduction measures are meeting the requirements of the City's TDM ordinance, traffic conditions will be monitored annually by means of daily and AM and PM commute hour driveway counts at each project access point. The counts will include daily as well as peak hour traffic counts to be conducted between 7:00 AM and 9:00 AM and between 4:00 PM and 6:00 PM on three non-consecutive days per year on typical weekdays (Tuesday, Wednesday, or Thursday) during the fall when school is in session. Mechanical tube counts, hand counts, or video counts may be used. The peak 60-minute period will be calculated for each two-hour traffic count period.<br>6. An annual employee survey will be conducted by an independent consultant to determine employee transportation mode choice (e.g., drive alone, carpool, bus, Caltrain, etc.). This annual commuter survey should be formatted as a general survey including non-transportation questions (e.g., satisfaction with property management, activities, etc.) to increase the response rate.<br>7. The project's Transportation Coordinator will work with an independent consultant to obtain traffic count data, implement the annual employee commuter surveys, and document all findings in a TDM monitoring report. The annual monitoring report will be submitted to the City of San Carlos by the Transportation Coordinator. The TDM Plan monitoring data will be reviewed by the City to assess whether the vehicle trip and VMT reduction goals are being met. This will be assessed by comparing the driveway counts to the trip targets of this TDM plan report.<br>8. For the life of the project, upon occupancy of any portion of the project site, a monitoring form must be completed and approved for the entire site on an annual basis to verify that both vehicle trip and VMT reduction goals are being achieved. If the annual monitoring report shows that the applicable targets have not been achieved for the project, the applicant shall submit a list of TDM Plan modifications to the Community Development Director for approval within 60 calendar days of the report submittal. The | | | | |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Community Development Director shall review the list of modifications and may also recommend modifications to the TDM Plan, as appropriate, in order to ensure that the applicable targets are achieved. Upon approval of the requested changes, the applicant shall have 30 calendar days to implement the approved measures. The applicant shall then submit a follow-up monitoring report within six months of implementation of the new measures.<br>9. If the project continues to not achieve the applicable targets, the City may require the applicant to enact other measures as appropriate to achieve the vehicle trip and VMT reduction goals.<br>10. The TDM Plan monitoring will include documentation of the total number of vehicle trips accessing the site on a daily basis as well as a mode split survey of building occupants used to estimate the site specific VMT per service population. The exact methodology for the monitoring plan must be reviewed and approved by City staff prior to the first monitoring period.<br><u>Revised Project Impact:</u><br>Same as the original project. The revised project is in the same location as the original project and would have the same overall VMT. Conclusions from the Draft EIR would remain valid for the revised project.<br><u>Revised Project Mitigation Measures:</u><br>MM Trans-2 exactly as written for the original project. | | | | |
| <u>Original Project Impact:</u><br>**Impact Trans-3: Meets Safety Standards.** The proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. This is a *less than significant* impact.<br><u>Original Project Mitigation Measures:</u><br>No mitigation warranted. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Impact:<br>Same as the original project. The revised project is not proposing any modification to the ultimate off-site roadway improvements that were proposed in the original project. All on-site circulation would be subject to the same safety standards and approvals as the original project. The transportation specialists for the Draft EIR, W-Trans, reviewed the details of the revised project, including the temporary parking lot in Phase 1 and timing of the roadway improvements. Consistent with conclusions in the Draft EIR, they concluded that site distances at driveways would be adequate and that any congestion or queuing at project access points would not result in CEQA impacts because these would also reduce vehicle speeds and would not result in substantially increased safety concerns. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Trans-4: Adequate Emergency Access.** The design of the project would meet all applicable City and safety standards related to circulation and emergency access. This is a *less than significant* impact.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project would be in compliance with the same standards and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| **TRIBAL CULTURAL RESOURCES** | | | | |
| Original Project Impact:<br><br>**Impact Tribal-1: Tribal Cultural Resources**. During ground disturbing activities associated within the project site, it is possible that currently unidentified tribal cultural resources could be discovered and disturbed. This impact is *less than significant with mitigation*.<br>Original Project Mitigation Measures:<br><br>**Mitigation Measures Culture-2a and Culture-2b** detailed in Chapter 7: Cultural Resources would be applicable to Impact Tribal-1 as well.<br><br>**GP-MM TRIB-1: Consider all Native American Archaeological Discoveries to be Significant Resources**. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 until the lead agency has enough evidence to make a determination of significance. The City shall coordinate with an archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications, as well as an appropriate tribe or tribes, as determined by the NAHC, to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. An archaeological report shall be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.<br>Revised Project Impact:<br><br>Same as the original project. The revised project would be in the same location as the original project and while the revised grading plan has increased overall to import an additional 52,669 cubic yards compared to the original project, the amount of soil being cut has decreased from 15,466 cubic yards to 3,103 cubic yards, indicating a decrease in ground disturbance. The revised project would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Revised Project Mitigation Measures:<br>MMs Culture-2a and Culture-2b exactly as written for the original project. GP-MM TRIB-1 would remain applicable to the revised project as well. | | | | |
| **UTILITIES AND SERVICE SYSTEMS** | | | | |
| Original Project Impact:<br>**Impact Util-1: Increased Utility Demand.** While the proposed project would lead to an increase in utility demand at the site, the project would utilize existing service systems, including some localized improvements, and is not by itself of sufficient size to require new or expanded off-site utility facilities. Therefore, the impacts related to increased utility demand would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size and in the same location as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Util-2: Increased Water Demand**. The project's water demands would not exceed water supplies available to serve the project, and there are sufficient water supplies to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. This impact would be *less than significant*. | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size as the original project and the original Water Supply Assessment would remain applicable. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |
| Original Project Impact:<br>**Impact Util-3: Increased Wastewater Collection and Treatment**. The proposed project would not exceed wastewater collection or treatment capacity. The impact related to wastewater would be *less than significant*.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size and in the same location as the original project. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | Yes | No | No | Less Than Significant |
| Original Project Impact:<br>**Impact Util-4: Increased Solid Waste Production.** Construction and operation of the proposed project would be expected to be in full compliance with all federal, state, and local statutes and regulations related | Yes | No | No | Less Than Significant |

| Original and Revised Project Impacts and Mitigation Measures | Impact Discussion | | | Resulting Level of Significance (Same as Draft EIR unless noted) |
|---|---|---|---|---|
| | Impact / Measures Remain Applicable? | New or Substantially Increased Impact? | New or Revised Measure? | |
| to solid waste. The project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and would not conflict with applicable solid waste management and reduction statutes. The project would have a *less than significant* impact in relation to solid waste.<br>Original Project Mitigation Measures:<br>No mitigation warranted.<br>Revised Project Impact:<br>Same as the original project. The revised project is approximately the same size as the original project and would be in compliance with the same statutes and regulations. Conclusions from the Draft EIR would remain valid for the revised project.<br>Revised Project Mitigation Measures:<br>None recommended. | | | | |

# 23

# REVISIONS TO THE DRAFT EIR

## INTRODUCTION

The following are minor modifications and clarifications made to the Draft EIR for the Alexandria Center for Life Science Project. An explanation of the changes made in response to comments can be found in Chapter 23.

Comments, including the original location in the Draft EIR of the revisions, are in *italics*. Deletions are noted by ~~strikethrough~~. Additions are <u>underlined</u>.

## LACK OF "SIGNIFICANT NEW INFORMATION"

This Final EIR provides substantial evidence that the information and revisions contained in this document clarify, amplify, or make insignificant modifications to the Draft EIR that do not constitute "significant new information" under CEQA and so do not require recirculation of the Draft EIR under section 15088.5 of the CEQA Guidelines. To that end, the following conclusions can be made from information in this document:

(1) No new significant environmental impacts would result from the revised project or from a new mitigation measure proposed to be implemented.

(2) No substantial increase in the severity of an environmental impact would result unless new mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) There are no new feasible alternatives or mitigation measures required to lessen significant environmental impacts of the revised project that the applicant declines to adopt.

(4) There is no information supporting a conclusion that the Draft EIR would be found to be fundamentally inadequate and conclusory such that meaningful review was precluded.

## REVISIONS TO THE DRAFT EIR

### CHANGES TO CHAPTER 2: EXECUTIVE SUMMARY

- *Page 2-4 through 2-16*

*Revisions are hereby made to Table 2.1: Summary of Project Impacts and Mitigation Measures to be consistent with specific revisions made to mitigation measures later in this chapter consisting of: Mitigation Measure Haz-2a and Mitigation Measure Haz-2b.*

### CHANGES TO CHAPTER 3: PROJECT DESCRIPTION

*Revisions are hereby made to Chapter 3: Project Description to update the project description consistent with revisions detailed in Chapter 23 of this Final EIR.*

## CHANGES TO CHAPTER 6: BIOLOGICAL RESOURCES

- *Page 6-6*

*The following revisions are hereby made to correct the tree size criteria from diameter to circumference, consistent with the city's Municipal Code.*

Protected Trees. Chapter 18.18, Landscaping, establishes regulations for the preservation of significant or heritage trees, defined as:

i. An indigenous tree whose size at 48 inches above grade is defined as:

• Coast live oak (*Quercus agrifolia*), greater than 30 inches in ~~diameter~~ circumference

• Interior live oak (*Quercus wislizneii*), greater than 24 inches in ~~diameter~~ circumference

• Valley oak (Quercus lobata), greater than 30 inches in ~~diameter~~ circumference

• Blue oak (*Quercus douglasii*), greater than 24 inches in ~~diameter~~ circumference

• Coast redwood (*Sequoia sempervirens*), greater than 72 inches in ~~diameter~~ circumference

• California bay (*Umbellularia californica*), 30 inches in ~~diameter~~ circumference or greater

• Madrone (*Arbutus meniesii*), 30 inches in ~~diameter~~ circumference or greater

• Buckeye (*Aesculus californica*), 30 inches in ~~diameter~~ circumference or greater

- *Page 6-18*

*The following revisions are hereby made to the second-to-last bullet point of Mitigation Measure Bio-4c, first paragraph on this page, to correct a typo.*

Monitoring plan, including success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. Success criteria shall include quantifiable measurements of riparian and aquatic vegetation type (e.g., dominance by natives), the appropriate extent for the restoration location, and the provision of ecological functions and values equal to or exceeding those ~~in the~~ affected by the project. At a minimum, success criteria shall include following:

## CHANGES TO CHAPTER 11: HAZARDS AND HAZARDOUS MATERIALS

- *Page 11-15*

*The following revisions are hereby made to the last paragraph on this page in response to DTSC's request to expand the list of common hazardous building materials in older buildings subject to state regulation that may be present in the existing buildings.*

Because of the age of the existing buildings, there is the possibility for hazardous material from asbestos-containing materials, ~~and~~ lead-based paint, and other universal wastes to be released during demolition activities. The removal of hazardous building materials prior to demolition is governed by federal as well as state laws and regulations.

- *Page 11-16*

*The following revisions are hereby made to Mitigation Measure Haz-2a in response to DTSC's request for clarity and to reflect the current status and requirements. Since circulation of the Draft EIR, the property owner has completed remedial actions required by the SFRWQCB, including the following: (1) installing the shallow groundwater monitoring wells, (2) monitoring of the new and existing wells, (3) the groundwater remediation, and (4) evaluation of vapor intrusion mitigation measures. At this time, the remedial actions are complete other than routine, ongoing monitoring of the wells, and unless SFRWQCP requests further investigation. Documentation of the actions including the Data Gap Closure Report (2020), Site Investigation Report and Groundwater Remedial Action Plan (2021), various follow-up monitoring reports, and a Supplemental Soil Vapor Investigation Report (2023), all available on the SFRWQCB's online database, GeoTracker. Accordingly, Mitigation Measure Haz-2a has been modified to reflect current existing conditions. In addition, in response to DTSC's comments, text has been added to the mitigation measure to clarify the extent of the SFRWQCB's oversight authority and the regulations related to imported fill material.*

**Mitigation Measure**

**Haz-2a:** **Compliance with ~~Removal Action Workplan,~~ Groundwater Remedial Action Plan, Soil and Fill Testing, 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 and Groundwater Remedial Action Plan,~~ prior to initiation of construction activities and shall demonstrate compliance with any agency-required post-construction requirements prior to occupancy. ~~The~~ A Groundwater Remedial Action Plan associated with ~~covers~~ the former Kelly Moore portion of the project site that included investigation and remediation activities has been implemented and completed, except for ongoing, routine groundwater monitoring. ~~and includes the following:~~

- ~~Installation and monitoring of three shallow groundwater monitoring wells in the central part of the impacted area.~~
- ~~Continued groundwater monitoring of the existing site groundwater monitoring well network in the southeastern area.~~
- ~~Groundwater remediation.~~
- ~~Evaluation of vapor intrusion mitigation measures for the three future occupied buildings on the former Kelly Moore sites.~~

In areas of the project site not included in the Groundwater Remedial Action Plan, if requested by the California Regional Water Quality Control Board, San Francisco Bay Region (SFRWQCB), further investigation for contamination shall be conducted. Contaminated soil or groundwater shall be handled per regulatory agency requirements. Soil imported onto the site for use as fill shall be evaluated in accordance with applicable regulatory guidance. A record of import fill sources and testing will be maintained as part of project records and provided to the SFRWQCB and the City.

- *Page 11-16*

*The following revisions are hereby made to Mitigation Measure Haz-2b in response to DTSC's request to more fully detail the extent of commonly-encountered hazardous building materials in old buildings that require special handling or disposal under existing state laws and regulations.*

**Mitigation Measure**

**Haz-2b:** ~~**Lead-Based Paint, Asbestos, and Mold**~~ **Hazardous Building Materials Abatement.** Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials, ~~and~~ lead-based paint, mercury, and polychlorinated biphenyl caulk, and during demolition, any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.

# 24

# RESPONSE TO COMMENTS

## INTRODUCTION

This chapter contains responses to the comments on the Draft EIR pursuant to CEQA Guidelines section 15088. Where revisions to the Draft EIR are appropriate, such changes are noted below and the actual text changes are included in Chapter 23 of this Final EIR document.

The City of San Carlos received five letters/emails from persons or groups commenting on the Draft EIR for the project, in addition to oral comments from the Commissioners at the August 13, 2024, Planning and Transportation Commission meeting. Public comment was opened, but no oral public comments were made at this hearing.

Specific comments are organized generally in chronological order by grouping, as follows:

## LIST OF COMMENTS

### LETTERS/EMAIL FROM AGENCIES

Letter A, Pacific Gas and Electric Company, 9/7/2024

Letter B, Department of Toxic Substances Control, 9/17/2024

Letter C, California Department of Transportation, 9/19/2024

### LETTERS/EMAIL FROM PERSONS AND GROUPS

Letter D, Jon Rose, 8/13/2024

Letter E, Paul Magginetti, 9/23/2024

### PLANNING AND TRANSPORTATION COMMISSION PUBLIC MEETING

A Special Public Hearing was held before the Planning and Transportation Commission on 8/13/2024 to accept comments from the Commissioners and the public. Excerpts from the transcript of this meeting containing Commissioner comments on the Draft EIR are included as Oral Comments PTC.

## RESPONSES TO SPECIFIC COMMENTS

The following pages contain comments on the Draft EIR. Each comment is numbered and a response is provided immediately following each comment.

In some instances, responding to a comment received on the Draft EIR resulted in a revision to the text of the Draft EIR, as indicated. Draft EIR text revisions are found in Chapter 23 of this Final EIR document.

Letters referenced in this chapter were not always focused solely on environmental matters, and comments sometimes refer to matters that are related to the project but that are outside the realm of environmental review. Accordingly, the responses to comments included here are intentionally focused on matters specific to the environmental review that is required under CEQA. A response noting that a comment is not related to the environmental analysis is intended to signify that the specific comment was not addressing a matter subject to review under CEQA and therefore that the EIR is not the appropriate forum for providing a response. Such a response is not intended to dismiss or diminish the validity of the comment outside the requirements of CEQA. All of the comments are a part of the record and will be considered by the Planning and Transportation Commission and City Council if and when project approvals are presented for their consideration.

**Letter A - Pacific Gas and Electric Company**

Comment A-1 Thank you for giving us the opportunity to review the subject plans. The proposed Alexandria Center for Life Science Project is within the same vicinity of PG&E's existing facilities that impact this property. PG&E operates gas and electric underground facilities within the franchise areas surrounding the subject property and gas and electric service lines on it. The current site plan does not contain enough information for a proper review to be conducted for impacts to PG&E facilities. The Company requests a fully developed site plan be submitted for review and approval prior to any construction commencing. The site plan should include all existing utilities and easements. Please contact the Building and Renovation Center (BRSC) for facility map requests by calling 1-877-743-7782 and PG&E's Service Planning department at www.pge.com/cco for any modification or relocation requests, or for any additional services you may require. As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

Response A-1 This is not a comment on the environmental analysis and no response is required in this EIR. This comment summarizes general information regarding PG&E's process related to development and utility installation. The request for a more detailed site plan is noted.

**Letter B - Department of Toxic Substances Control**

Comment B-1 The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (DEIR) for the Alexandria Center for Life Science Project (Project). The proposed Project includes the removal of existing commercial and industrial buildings and construction of a new office/research and development (R&D) campus including six life science office/R&D buildings with a total of approximately 1,603,375 square feet of building space, 4,500 square feet of retail/commercial space, and 11,543 square feet of amenity space, which may include a daycare. Other improvements include two above-grade parking structures, open space and stormwater management including improvements to Pulgas Creek, pedestrian and bicycle connections, landscaping, and circulation/parking elements.

After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. The proposed project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a

result of this project. This may restrict what construction activities are permissible in the proposed project areas in order to avoid any impacts to human health and the environment. One of these clean-up sites is the Tanklage Square (Tanklage).[1] The Project is located southwest of the Tanklage, which has a Land Use Covenant (LUC). Based on past investigations at Tanklage, it is recommended that the City of San Carlos should characterize groundwater and soil vapor at the proposed Project site to determine the need for potential vapor mitigation. As part of the Tanklage characterization, "Chlorinated volatile organic compounds (VOCs) including tetrachloroethylene (PCE) and trichloroethylene (TCE) were identified in groundwater off-site to the west/southwest of the former dry-cleaning operation [Tanklage site] (Ramboll, 2017)."

Response B-1 The project site is not believed to be a source of contamination to the Tanklage site, and the Tanklage site is unrelated to the project site. As described in Chapter 11 of the Draft EIR, there are two active environmental regulatory oversight cases for the project site. The California Regional Water Quality Control Board, San Francisco Bay Region (SFRWQCB) is the lead agency for both cases, which are voluntarily enrolled in the SFRWQCB's Site Cleanup Program. The project applicant (Applicant) is the responsible party for the former Kelly Moore case, and Northrop Grumman is the responsible party for the L3/Litton case at 960 Industrial Road. The Applicant is actively coordinating with the SFRWQCB and Northrop Grumman to ensure that site contamination issues will be addressed prior to and during redevelopment to ensure that site conditions are suitable for the future land use.

Links to the State Water Resources Control Board's Geotracker online database for each case are included below, where an extensive document history is available for each site:

KELLY MOORE PAINT COMPANY INC (T0608191580): Available at: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608191580

LITTON ELECTRON DEVICES (SL1821P612): Available at: https://geotracker.waterboards.ca.gov/profile_report?global_id=SL1821P612

Extensive sampling of soil, soil vapor, and groundwater has been conducted across the entire site, especially within the last 10 years as part of the two oversight cases noted above, and in relation to real estate transactions and planning for future site redevelopment. The primary contaminants of concern across the site are volatile organic compounds (VOCs) including chlorinated solvents, and petroleum hydrocarbons in certain areas.

As needed, additional investigation, mitigation, and remediation will be conducted under SFRWQCB oversight, and will be driven by available site data and plans for future use of the site. For the project site, it is likely that several approaches will be implemented as part of redevelopment activities, including soil excavation and soil vapor mitigation. Those details will be developed and implemented in conjunction with specific development design plans, and at the request of the SFRWQCB.

[1] https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60001135

As stated in Mitigation Measure Haz-2a of the Draft EIR, the applicant shall comply with regulatory agency requirements related to project site contamination. Mitigation Measure Haz-2a has been modified to reflect the status of remediation efforts and provide more detail regarding the regulations and guidance that apply to the project site. See specific text revisions in Chapter 23 of this Final EIR document.

Comment B-2

2. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.[2] Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary.[3] To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.[4]

Response B-2

Mitigation Measure Haz-2a has been modified to clarify the SFRWQCB's oversight authority and that imported soil and fill material would be handled in accordance with regulatory guidance and appropriate records kept. See specific text revisions in Chapter 23 of this Final EIR document.

Comment B-3

3. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's PEA Guidance Manual.[5]

   DTSC believes the City of San Carlos must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered. Please refer to the City of San Carlos EnviroStor Map for additional information about the areas of potential contamination.[6] If further concerns or impacts surface in light of the any

[2] https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdtsc.ca.gov%2Fwp-content%2Fuploads%2Fsites%2F31%2F2023%2F06%2FPEA_Guidance_Manual.pdf&data=05%7C02%7C%7Ca606c77fc39142ea02f308dc90a10ca4%7C3f4ffbf4c7604c2abab8c63ef4bd2439%7C0%7C0%7C638544268590390365%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=fqQEpOdIVq9VkcewNVeP1Gr0LZoDfEsMjcsC1%2BaiT%2FA%3D&reserved=0

[3] https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdtsc.ca.gov%2Finformation-advisory-clean-imported-fill-material-fact-sheet%2F&data=05%7C02%7C%7Ca606c77fc39142ea02f308dc90a10ca4%7C3f4ffbf4c7604c2abab8c63ef4bd2439%7C0%7C0%7C638544268590400845%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=sXbrtPK5noBFhjTKPKix6CXl8qYcamGKG4yMwbQ%2BRsg%3D&reserved=0

[4] https://dtsc.ca.gov/human-health-risk-hero/

[5] https://dtsc.ca.gov/wp-content/uploads/sites/31/2023/06/PEA_Guidance_Manual.pdf

[6] https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=San%20+%20Carlos+%20CA

forthcoming environmental documents, DTSC reserves the right to provide additional comments at that time.

DTSC appreciates the opportunity to comment on the DEIR for the Alexandria Center for Life Science Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via email for additional guidance.

Response B-3 As discussed in the Draft EIR, pages 11-15 to 11-16, the possibility of hazardous material release during demolition was identified as a mitigated impact. Mitigation Measure Haz-2a has been modified to provide more detail regarding the state guidance with which the project must comply and Mitigation Measure Haz-2b has been modified to provide a fuller list of the potential hazardous building materials subject to existing state requirements related to handling and disposal. See specific text revisions in Chapter 23 of this Final EIR document.

**Letter C - California Department of Transportation**

Comment C-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Alexandria Center for Life Science Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the July 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

**Project Understanding**

The proposed project would demolish existing commercial and industrial buildings to construct an office/research and development (R&D) campus-style development on the 25.34-acre project site located between U.S. Route 101 (U.S. 101) and State Route (SR) 82. A total of 1,522,508 square feet of building space would be constructed across six office buildings, one centrally located community center, and in retail spaces in above-grade parking structures. The project would also construct bicycle amenities and ground-level open space for recreation. The project site is located within a tenth of a mile from SR 82 but is not directly adjacent as it is separated from SR 82 by Old County Road and Caltrain tracks.

**Travel Demand Analysis**

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory and the City of San Carlos' Transportation Significance Criteria for Implementing VMT. Per the DEIR, this project is found to have a less than significant VMT impact with the implementation of a Transportation Demand Management (TDM) plan. Caltrans commends the Lead Agency in developing the TDM plan to reduce employee and guest VMT, therefore working towards meeting the State's goal of a 15-percent reduction. The proposed mitigation measures identified in the TDM plan should be documented with annual monitoring reports to demonstrate effectiveness.

**Construction-Related Impacts**

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (link).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

**Lead Agency**

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the 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.

**Encroachment Permit**

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' right-of-way (ROW) requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.

The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (link). Please note that the checklist TR-0416 is used to determine the appropriate Caltrans review process for encroachment projects. Your application package may be emailed to D4Permits@dot.ca.gov.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov.

For future early coordination opportunities or project referrals, please visit Caltrans LDR website (link) or contact LDR-D4@dot.ca.gov.

Response C-1 This is not a comment on the environmental analysis and no response is required in this EIR. The information included in this comment is noted.

**Letter D - Jon Rose**

Comment D-1 The formula used to predict the impact of this large project on traffic, parking, and housing is deeply flawed. The developer plans 3,373 parking spaces, indicating at least 3,000 cars per day traveling to the site. It is obvious that this will have a major impact on traffic. During peak hours traffic on Brittan is already backed up, as is traffic on Holly. Three thousand cars may be an underestimate. It assumes many employed at the site will ride bikes or use public transportation. That is only likely to happen if they are able to buy or rent housing near a Caltrain station. I commuted to Palo Alto several years via Caltrain and busses. Usually I was the only white-collar/professional worker on the bus. Even when Caltrain was delayed, more than half of my fellow train passengers would call Lyft or Uber during peak pricing times rather than ride the bus. So, if the number of cars visiting the site is more than 3,000, neighboring parking will also be impacted.

There is already a shortage of housing on the peninsula, and the cost of housing that biotech workers will want is so high that many will commute from the East Bay or at least Daly City. This will have a negative impact on air quality.

Response D-1 As explained in the Draft EIR pages 15-6 through 15-7, state law now requires that CEQA analysis not rely on congestion-based metrics ("traffic") for evaluation of transportation impacts and instead that a metric based on the amount of driving (VMT) is used for assessment of vehicle-related transportation impacts. Similarly, CEQA specifically provides in Section 21099(d) that potential parking effects of an employment center project on an infill site within a transit priority area – descriptions that apply to the project, as explained on Draft EIR pages 3-2 and 4-1 - are not considered significant impacts on the environment. Both these topics (traffic and parking) are considered by the City as part of project entitlement considerations outside of the CEQA process, so are not further discussed in this EIR. While not a CEQA topic, it can be noted that the City's non-CEQA Traffic Operations Analysis concluded that the proposed on-site parking supply would be able to accommodate the project's projected parking demand.

As detailed in Appendix H of the Draft EIR, pages 14 through 18, a VMT analysis was conducted for the project in accordance with requirements of CEQA, SB 743, and the City of San Carlos VMT Policy. The C/CAG-VTA Bi-County model was used for the VMT analysis, consistent with City and County guidelines for preparation of travel forecasts that include both VMT and trip estimates for the proposed project. This methodology relies on regional modeling of employee commute patterns and not on the number of parking spaces.

The potential for employees to commute from farther away – such as Daly City and the East Bay – to meet the increased demand for such workers was addressed in the Draft EIR, pages 15-16 through 15-19, which explains that the VMT model is based on regional commuting patterns, and includes the assumption that the average employee VMT would increase over time as increased demand would expand the draw for qualified employees to more distant areas.

As discussed in that section of the Draft EIR, the City's TDM ordinance requires a 20% reduction in trips and Mitigation Measure Trans-2 requires additional implementation and monitoring measures. As also noted, the applicant is additionally working with the City to develop a Transportation Management Association (TMA) Plan to increase efficiency and effectiveness of transportation demand management for all the developments in the East Side Innovation District.

As discussed in the Draft EIR, pages 5-22 through 5-24 and detailed in Draft EIR Appendix B, operational employee trips were included in the emissions quantification completed for this project, and the project was found to have a less than significant impact with implementation of a TDM plan (discussed above) and Mitigation Measure Air-3, requiring super-compliant volatile organic compound coatings to reduce on-site operational emissions.

Comment D-2 Those that do purchase or rent locally will drive the cost of housing up even further due to greater demand. The environmental impact report should also consider the impact of so many workers and possible residents on our water and sewage capacity. Already I have low water pressure in the morning when large properties water landscaping. Between 7 and 8 am my sprinklers no longer reach the edges of my lawn.

Response D-2 With respect to housing demand and costs, CEQA defines environmental impacts as physical changes in the environment that may be caused by a project, and specifically provides that economic and social effects are not considered significant impacts on the environment (CEQA Guidelines Section 15131). As discussed in the Draft EIR pages 14-5 through 14-6, while the project would increase employment opportunities and therefore contribute to indirect population growth, the project is consistent with relevant City and regional plans. Additionally, the project would be required to pay the City's Commercial Linkage Fee as part of the Commercial Development Below Market Rate ("BMR") Housing Program, which requires new employment developers to pay a fee per net new square foot of new development to help fund the construction of additional BMR housing.

As discussed in Chapter 17: Utilities and Service Systems of the Draft EIR, and especially pages 17-15 through 17-21, utility impacts were assessed using utility plans and reports prepared by certified professionals in coordination with City staff and contract professionals. These included a Utility Demand Report, Sewer Capacity Model Update, and a Water Supply Assessment that was completed in coordination with the water supplier, Cal Water. The City's sewer model update identified improvements along Industrial Road, which were proposed to be completed as a part of the project, including an offsite replacement of a sewer pipe under Industrial Road. As indicated (Draft EIR page 17-20), the project would be required to participate in Cal Water's Development Offset Program to contribute to supply augmentation and/or demand management measures to offset the project's water use. No other system improvements were determined to be necessary for water or sewer related to this project.

Comment D-3 The negative impacts this large development will cause for our city exceed the benefit of added employment, local business customers and taxes. I ask the city to not approve this development.

Response D-3 This comment expresses opposition to the project and is not a comment on the environmental analysis. No response is required in this EIR.

**Letter E - Paul Magginetti**

Comment E-1 I am writing to express my concerns regarding the Alexandria Draft Environmental Impact Report (EIR) for the proposed development project. After reviewing the document, I would like to address several key areas that I believe require further scrutiny and consideration. My comments are based on the sections outlined in the EIR:

1. Impact Bio-4: Indirect Impacts on Wetlands: The EIR states "the project activities could result in temporary and permanent effects on a Perennial Stream and jurisdictional waters." It goes on to describe mitigations for these effects that "would result in the placement of permanent structures and materials within the bed and bank of Pulgas Creek" This creek has been neglected and abused for decades, resulting in a canal full of garbage, and debris; completely lacking an ecosystem that such a creek would normally support. Will the mitigations proposed return the creek to its natural state or will it simply return it to its current state of a canal full of toxic mud and debris? The current creek condition is a result of property owner neglect and should not become a taxpayer responsibility. Who will pay for these mitigations?

Response E-1 The revised project proposes improvements to the hydrology, aesthetics, and biological habitat of Pulgas Creek, including a public creekside trail. These would be paid for by the Applicant; the Applicant also would maintain its side of the creek. See pages 22-1 and 22-2 and Figures 22.4a through 22.4d of this Final EIR, as well as Appendix J, for updated details of the improvements to Pulgas Creek. As discussed in the conclusion under the referenced Impact Bio-4 (page 6-18 of the Draft EIR), while mitigation to be implemented by the applicant is identified to ensure appropriate care is undertaken during construction activities with respect to the creek and applicable regulations that may apply, the proposed improvements to the creek would be a net benefit for the biology of the creek, and would, "result in a net increase in aquatic resource function and services."

Comment E-2 It also describes a mitigation of "Debris removal within the creek channel to remove existing obstacles to flow". Why is this mitigation tied to this project? The creek is currently choked with bushes, trees, and debris, resulting in seasonal flooding of Old County Road and Industrial Road. Why are the current property owners not required to remove this debris now to correct a deficiency they have allowed to happen? Is this not a code violation that they should be responsible for correcting now, separate from project considerations?

Response E-2 The comment is not referencing a mitigation measure, but rather an item from the list of work that is proposed within or along the creek from pages 3-10 and 6-14 of the Draft EIR. This comment refers to code enforcement, and is not a comment on the environmental analysis and no response is required in this EIR.

Comment E-3 2. Hazards and Hazardous Materials: This project site encompasses the old GTE Lenkurt/ Litton Electron Devices and Kelly-Moore Paint Company, Inc. sites, who together have created one of the most toxic sites on the Peninsula. The city of San Carlos has gone so far as to sue Monsanto over removal of toxic PCBs contamination (see Almanac online, April 23, 2022). The existing toxic chemical contaminants are described in some detail in the EIR, contaminants which, as a result of chemical leaching and stormwater runoff, the city routinely discharges to the bay from the Pulgas Pump station. This fact is covered in some detail in the Clean Watersheds for a Clean

Bay (CW4CB) project start over a decade ago, which documents this discharge. Rising sea levels threaten to increase the rate of leaching of toxic contaminants from this highly impacted site. Despite this, the EIR emphasizes capping or otherwise preventing disturbing this toxic soil during construction. Why is the city's EIR not seeking to take advantage of this once in a lifetime opportunity to remove this contaminated soil and permanently removing this toxic legacy? The applicant is asking for far more than what is allowed in the General Plan. Why is the city, in return, not asking for more than the minimum required by regulation and the law by requiring additional contaminated soil excavation and removal? Is the city prepared to accept responsibility for the continued discharge of PCBs, TCE, PCE, and other forever chemicals into the creek and the bay from this continuous drip, drip, of leached chemicals? What, specifically, is the city going to require for toxic soil contaminant cleanup? Does the city have anybody on staff with enough expertise to judge if toxic soil contaminant cleanup has been performed to what the city requires?

I appreciate your attention to these concerns and look forward to seeing how the city addresses these issues in the final EIR. Thank you for considering my comments.

Response E-3 As discussed in Chapter 11: Hazards and Hazardous Materials in the Draft EIR, and especially pages 11-15 and 11-16, the project site has been analyzed in technical Phase I and II Environmental Site Assessments that characterize and measure potential contaminants in soil and groundwater and the project would be required to comply with all applicable regulations related to site contamination. Since preparation of the Draft EIR, remedial actions required by the California Regional Water Quality Control Board, San Francisco Bay Region (SFRWQCB), who has regulatory oversight at the project site, have been implemented and completed. This included groundwater remediation and installing and monitoring groundwater monitoring wells. Mitigation Measure Haz-2a, including revisions specified in Chapter 23 of this Final EIR, specifies that the project is required to test soils and fill, and complete any further remediation activities in coordination with applicable regulatory agencies that have jurisdiction over such activities. Please see also Response B-1.

The project is consistent with the General Plan, which designates the project site as "Planned Industrial," which permits research and development, biotech, light industrial, flex, warehousing, and related uses. A rezoning from a Heavy Industrial zone to Planned Development zone is proposed to allow for the precise density, layout, and design proposed by the Applicant. In addition, the project includes a Development Agreement under which the City can seek "community benefits" that exceed standard requirements. Through the City's negotiation of the Development Agreement, the Applicant will be providing several community benefits, which were generally listed on page 3-6 of the Draft EIR, with final wording to be determined through the Development Agreement.

**Planning and Transportation Commission Public Hearing Oral Comments**

[Video available at: https://www.youtube.com/watch?v=ACClldS5gCY. There were no public comments. The following is excerpted from the transcript and includes clarifying questions and comments from the Commission. Transcript excerpt begins at 29:06.]

Comment PTC-1 **[Commissioner Ellen Garvey]** Just a couple of clarifying questions. I don't know where to start. I'll start on energy. It wasn't clear to me if the energy analysis in the EIR contemplated that there would be full build out on the rooftop of both garages with

solar panels. I read in the EIR that the rooftops were going to be wired for solar. Does the EIR then contemplate "well what if they don't build any solar, this is the energy use then for the project" and if they end up do putting solar on, then you've evaluated the worst case and it simply only gets better? Can you help me understand that better?

**[Environmental Consultant Rebecca Auld]** I could jump in if you want Lisa. So the quantification of energy that was utilized in the report assumes no solar. So any solar that's added would then just improve the energy.

**[Commissioner Ellen Garvey]** Okay that's helpful. And then I guess as a follow-up: I didn't see that the applicant was going to use any power packs any way to store any of that solar energy so if they chose to put solar on and put in battery power packs battery backup packs that too would simply reduce the energy impacts from the project and the situation would continue to improve.

**[Environmental Consultant Rebecca Auld]** That stands to reason

Response PTC-1 The commissioner's questions regarding solar panels were answered at the meeting. Solar panels and batteries are not required by the current building code. Project plans include future solar panels atop each of the two parking garages.

Comment PTC-2 **[Commissioner Ellen Garvey]** Okay. Thank you, that's helpful. My second question is regarding the production of cement. These projects use a lot of cement. Many projects of this size bring, use so much cement that they build a temporary cement plant on site. I think I read in the packet that CEMEX is nearby and while it didn't declaratively say CEMEX is going to supply all the cement, can you clarify is all of the cement coming from offsite, and there isn't going to be a temporary cement plant onsite during any phase of the project?

**[Environmental Consultant Rebecca Auld]** I think this is going to be one of those we'll have to respond to in the Final EIR.

**[Commissioner Ellen Garvey]** Okay that would be helpful, because there are air pollution emissions associated with the manufacturing of cement and if there, if that all of that cement is going to be manufactured offsite then it's not really a part of the project and the EIR I think could flush that out a little bit, in a little bit more detail. Thank you very much Chair.

Response PTC-2 A temporary cement plant on the site is not proposed and is not assumed in the analysis. The exact source of the cement has not been determined but would be from an existing plant with existing permits and operations. Such a plant is not a part of the proposed project or required to be included in the analysis for this project. There is another unassociated project proposed at the site of the nearby CEMEX cement plant (789 Old County Road), so it is not certain to be in operations when this project is constructed and sourcing of cement at that location was not assumed. Therefore, rather than reduced emissions from the transportation of closer sources of cement, standard modeling assumptions were included in the emissions analysis for transport of construction materials, including concrete, to the site. No changes are necessary to the analysis in the Draft EIR.

Comment PTC-3 **[Vice Chair Kristen Clements]** Thank you Chair. I had a couple of questions. First I wanted to start on page 5-29. It looks at the risk for potential daycare due to hazardous

air quality and I wanted to ask about the assumptions in the analysis because daycare involves outside play space by law. The ventilation system, interior proper installation and maintenance would help reduce risks but can you elaborate a little bit about how the analysis considers outside play space for daycare as well as the interior play spaces.

**[Environmental Consultant Rebecca Auld]** So this is a pretty detailed answer and again I think in the Final EIR is the appropriate place for that but we'll definitely deal with it there.

Response PTC-3 It should first be noted that a daycare is only one of the potential uses that could be located in the B7 amenity space, and that even if a daycare were included in B7, it would be part of the project, and therefore health risk to a project element would not be considered an impact under CEQA. Such a health risk assessment was nevertheless included as an information item only in the Draft EIR. The following response is also included for informational purposes:

The emissions analysis (Appendix B of the Draft EIR) included standard modeling assumptions for a daycare that 10 percent of the time would be spent outdoors. The identified health risk was driven largely by proximity of the potential on-site daycare to on-site heavy construction activities and as noted on pages 5-9 and 11-17 of the Draft EIR. The project applicant has agreed to a condition of approval that if a daycare is included, and if it were otherwise operational prior to completion of all on-site heavy construction activities, operations of the daycare would be suspended during such activities, which minimizes potential health risks to below thresholds. As can be calculated from Table 12 on page 49 of the emissions analysis (Appendix B of the Draft EIR), with the on-site construction removed, cumulative health risk would be well below levels at which such risks would be considered significant, even without proposed enhanced indoor air filtration, namely a cumulative cancer risk per million of 8.57 compared to a threshold of 100. Differences in assumptions related to the percent of time spent for outdoor activities would not substantially change these risk levels.

Comment PTC-4 **[Vice Chair Kristen Clements]** Okay, all right, thank you. I had a couple of other questions. They're more potentially for staff. By the way I was really enjoying some of these sections. I was like “oh now I understand the rules better for BAAQMD, GHG reduction guidelines, what we have to have, what our CMAP does, our climate mitigation action plan. So I was really actually enjoying all that, the litany of rules. But a staff question on from possible erosion during construction into the creeks, how, and there are going to be, with mitigation measures, less then significant risk during construction, my question is how does staff monitor the erosion control systems during construction? is that, does that come with building inspection trips or is there some other process?

**[Principal Planner Lisa Costa Sanders]** I believe Public Works actually conducts those inspections to ensure that the storm water measures are in place, yes.

**[Vice Chair Kristen Clements]** Okay great. And similarly, well a little bit different, but thinking through the implementation of the TDM program. Staff clears the TDM and its implementation before issuing the certificate of occupancy for the project, according to the mitigation measures. What staff at the city is responsible for clearing the actual implementation for the TDM program is it public works, is it planning?

**[Principal Planner Lisa Costa Sanders]** It's currently Planning but we're working very closely with Public Works now that we have a new senior traffic engineer on board.

**[Vice Chair Kristen Clements]** Okay great and they also, together you would be reviewing the annual reports is that?

**[Principal Planner Lisa Costa Sanders]** That's correct.

Response PTC-4 This is not a comment on the environmental analysis and was answered at the meeting, and no response is required in this EIR. Pursuant to CEQA Guidelines Section 15097, if the project is approved and the EIR certified, a Mitigation Monitoring and Reporting Program (MMRP) would also be adopted at the same time. The MMRP includes details about implementation responsibilities and monitoring procedures specific to each required mitigation measure.

Comment PTC-5 **[Vice Chair Kristen Clements]** Okay great. And then one last question which is there is reference to vehicle miles traveled offsets by a potential transportation management association, the TMA, that's always been identified for this area as hopeful. How does the analysis think about the likelihood in the near term versus a longer term, depending on when the TMA would come into play, and how do you do the analysis around that then?

**[Principal Planner Lisa Costa Sanders]** Rebecca do you want to respond to that?

**[Environmental Consultant Rebecca Auld]** I'm sorry could you repeat that?

**[Vice Chair Kristen Clements]** Sure. I was referring to the reference of the transportation management association on page 15-19 and just wondering, because it's not known what the timing would be for the kickoff of the of the TMA and kind of a zone wide transportation kind of service, that one property alone could not afford, how do you think about the analysis for the reduced or the mitigated risks from that TMA and its activities?

**[Environmental Consultant Rebecca Auld]** Sure. So for exactly the reasons that you mentioned, the analysis did not factor in the TMA. It looked at just the current single development TDM plan that they've proposed, in case there is no TMA or in case the TMA doesn't happen when this project starts, and so it's that basic TDM plan that the analysis was based on. The TMA again would just make it better.

**[Vice Chair Kristen Clements]** Got it. Thank you very much, that's all.

Response PTC-5 The commissioner’s questions regarding the TMA were answered at the meeting, and no additional response is required.

Comment PTC-6 **[Commissioner Janet Castaneda]** Thank you. I'd like a little more information on the soil report and the geology. The report indicates that this particular area, there's a high expansion potential for the soil and also settlement potential and liquefaction, and I read the measures but I'm not sure that they explain really how that is addressing those problems and so I would like some more information about that, the measures that we're taking in this project to deal with those problems.

**[Environmental Consultant Rebecca Auld]** So we can respond in the Final EIR, I think that's most appropriate, but for your information these are relatively common characteristics of soil particularly in the Bay Area so it's things that folks are used to addressing but we'll expand on that in the Final EIR.

Response PTC-6 As discussed in Chapter 9: Geology and Soils of the Draft EIR, and especially pages 9-11 and 9-12, the project would be required to comply with the Design-Level Geotechnical Investigation and Structural Design Plans, which look specifically at the soils and conditions at the project site and determine the proper site preparation and foundation engineering to reduce the impacts of differential settlement on the project.

The Geotechnical Investigation for the project, conducted by Langan, incorporated by reference and included in the project application materials, provides detailed recommendations for constructing on soils with potential for expansion on page 18. To reduce potentially damaging effects to the project of on-site expansive soils, moisture conditioning of the soil and either providing non-expansive fill under slabs or using lime treatment is recommended. Foundations can also be supported below the zone of seasonal moisture change. Exterior improvements such as sidewalks and courtyards may distort or crack periodically, and would likely need to be repaired or replaced over the lifetime of the project. A flexible seal should be used to join exterior slabs and buildings.

The Geotechnical Investigation (page 21) details the options for foundation and slab design. Due to the damage potential of liquefaction, the project cannot be built on shallow foundations with no further support. Foundation and floor slab options would need to include rigid inclusions (columns installed in the soil), stone columns, engineered fill, and/or a structural slab, to increase bearing capacity and mitigate for ground failure.

The above referenced Geotechnical Investigation was completed based upon the conceptual project plans. As is standard procedure, the Geotechnical Investigation would be updated along with more detailed Structural Design Plans to incorporate and refine the initial recommendations. Checking compliance with these Design-Level Investigation and Structural Design Plans is a standard permitting procedure, and is also indicated as a Standard Condition applicable to the project on page 2-21 of the Draft EIR.

Comment PTC-7 **[Commissioner Janet Castaneda]** Okay and just one other question, on air quality as we're determining the issues that will come along with the construction itself to air quality, how is this project considering possible cumulative effects from other ongoing construction projects in the area?

**[Environmental Consultant Rebecca Auld]** Those were modeled as well as part of the emissions analysis.

**[Commissioner Janet Castaneda]** They were? Okay, thank you.

Response PTC-7 The commissioner's questions regarding the air quality analysis were answered at the meeting, and no additional response is required. The cumulative emissions assessment, including other area projects, is included on pages 36 through 44 of Appendix B of the Draft EIR.

Comment PTC-8 **[Commissioner David Roof]** I had a clarifying question or two regarding the Pulgas Creek. Could somebody explain what the current state of that creek is so that will help me understand the work that would need to be done. Is it just a concrete lined ditch or what? And then perhaps what's going to be involved to rehabilitate it. I saw there was descriptions of dewatering and the like but I just wanted to get a little more context around what the project involves there and then an additional question is this the overall project is phased development and I wondered where the creek work falls in the phase one, two, and three.

**[Environmental Consultant Rebecca Auld]** So there's a lot in that question, yeah. So I can try to put together an answer, it's going to take me a minute or we can defer to the Final EIR. What do you think, Lisa?

**[Principal Planner Lisa Costa Sanders]** Do you have any general comments on the creek existing or you're wanting to look that up to be accurate?

**[Environmental Consultant Rebecca Auld]** Yeah, I'm looking it up right now.

**[Principal Planner Lisa Costa Sanders]** Okay. And we can provide that additional information with the Final EIR.

**[Environmental Consultant Rebecca Auld]** Yeah, and I think the short answer is that it's kind of a mix. Yeah, so along the whole project site some of it is all concrete and some of it is not all concrete.

**[Principal Planner Lisa Costa Sanders]** Rebecca, do you have the assumptions of the phasing on when the creek work would occur?

**[Environmental Consultant Rebecca Auld]** I do, give me a moment. The creek work would occur potentially in two different phases. So my understanding is that as the area adjacent to that portion of the creek develops that's when improvements would start to be made to that section of the creek so the half of it would be in phase one but the then it wouldn't be completed until phase three.

Response PTC-8 Under existing conditions, Pulgas Creek along the project site is considered to be "channelized," meaning that it is carried through a concrete channel. The biological analysis goes into more detail about the current state of the channel, specifying on page 4 of Draft EIR Appendix C that, "[s]mall patches of vegetation grow sporadically between the sections of concrete lined channel, but do not provide suitable cover or connectivity to occupied habitats."

In the revised project description, as described in Chapter 22 of this Final EIR document, Pulgas Creek improvements are proposed entirely in Phase 2. The entire length of the creek corridor along the project site would be improved during this phase, subject to approval of the necessary permits and obtaining the necessary rights of entry and landowner and tenant consents for offsite work. This timing is due to existing lease agreements at 960 Industrial Road that preclude completion as part of Phase 1. As detailed in the Pulgas Creek Mitigation Design Concept Memorandum completed for the applicant and included as Appendix J, improvement to the creek slopes would include a combination of Geoweb panels, riprap, native planting, and vegetated retaining stair walls. Cross-sections of the existing and proposed creek conditions are included as Figures 22.4a to 22.4d in this Final EIR.

Comment PTC-9 **[Chair Jim Iacoponi]** For me I think regarding the hazards identified and mitigated during the construction phase I think my colleagues have flagged the two that and I think the report said as well the soil and the existing conditions in the soil and then groundwater and any existing conditions in the groundwater, so my question is, is the standard of treatment, the standard of care that's assumed equal to a high level of assumed existing pollutant or is it going to be designed and implemented after discovery is done. I'm not sure if a Phase 1 was done and what exactly people have discovered but maybe I didn't read it well enough. it's not clear whether the water and soil treatment during construction is above and beyond given the state of the existing conditions. So either assure me that it is or help me by amending the EIR later.

**[Environmental Consultant Rebecca Auld]** Yeah and we can respond more in the Final but I would say that it is based on the conditions at the site which have been assessed in detail so that's laid out largely in the Hazardous Materials section of the Draft EIR and the supporting documentation for that.

**[Chair Jim Iacoponi]** Thank you and I flagged that because in our taking Community comment in past that was, has been a point of great concern, so I again, for the public and for, I want to make sure that it's very clear how that is going to be handled and handled with the care due, given what we found already.

Response PTC-9 As discussed in Chapter 11: Hazards and Hazardous Materials in the Draft EIR, and especially pages 11-15 and 11-16, the project site has been analyzed in technical Phase I and II Environmental Site Assessments that characterize and measure potential contaminants in soil and groundwater and the project would be required to comply with all applicable regulations related to site contamination. As discussed in Response B-1 of this Final EIR, remedial actions required by the SFRWQCB have been completed. Mitigation Measure Haz-2a, including revisions specified in Chapter 23 of this Final EIR, specifies that the project is required to test soils and fill, and complete any further remediation activities in coordination with applicable regulatory agencies that have jurisdiction over such activities.

Comment PTC-10 **[Chair Jim Iacoponi]** So thank you for that, and then the second one is regarding the, during operations I think you've flagged the Transportation Demand Management plan and I'll focus on that with my question.

Is the TDM that we will, someone will, approve at some point will be of a scale or a potential impact greater than the city has seen I think in forever in development so again is there a standard of care in TDM which is commensurate with the scale of the impact and the number of daily trips generated or is it just, it's all proportional. Does it go out any further, does it look at a bigger catchment area, are there anything specific given the scale of the impact that we might know about?

**[Environmental Consultant Rebecca Auld]** Yeah so there is an addition to the city's municipal code requirements already for a TDM plan. There's a mitigation measure that's being applied to this project in particular that enhances the requirements and regulations around a TDM plan. And that's all still not even as high of a threshold as creation of a TMA which would do even better than all that.

Response PTC-10 The chair's questions regarding the TDM plan were answered at the meeting, and no additional response is required. The referenced measure is Mitigation Measure Trans-2. As described on page 15-19 of the Draft EIR, the referenced Transportation

Management Association (TMA) Plan would be applicable not just to the project, but to all the developments in the larger East Side Innovation District, with the intent to increase efficiency and effectiveness of transportation demand management throughout the larger area.

Comment PTC-11 **[Chair Jim Iacoponi]** Thank you that's really helpful no more for me let's go back to Commissioner Garvey any follow up or you settled?

**[Commissioner Ellen Garvey]** I have additional questions but I'm also okay with waiting until after we've heard from the public and picking it up. What would you like to do?

**[Chair Jim Iacoponi]** Well if you've got something burning that that the public might queue off of let's get it in. Otherwise again, it's true for everyone, let's make sure the public has their opportunity and then we'll come back to us. So feel free if you've got something.

**[Commissioner Ellen Garvey]** I do have one or two more. I'll do one and then I'll loop back later. This one had to do with the type of glazing on the glass and bird collisions and the EIR did contemplate the design of the structure including the lack of extensive glazing elements.

I'm wondering I couldn't tell if the EIR just looked at this type of glass sort of generically or did the EIR look at other types of glass on buildings that already exist in San Carlos and I don't know if there have been bird collisions a little higher than normal on the glass on buildings in San Carlos so I just wanted to know a little bit more what did the EIR review when they looked at this special kind of glass that does not result in many bird collisions thank you.

**[Environmental Consultant Rebecca Auld]** Sure, we can respond more detailed in the Final EIR but to answer shortly it's there's a whole industry around what's called bird safe design and so they understand the different glazing and whatnot and we'll take a look at what we analyzed and lay that out in the Final EIR for you.

Response PTC-11 Consistent with the revised project description presented in Chapter 22 of this Final EIR, a revised Avian Collision Risk Assessment was prepared for the applicant using the updated plan set and is available as part of the project application materials. The Avian Collision Risk Assessment determined the predicted frequency of bird use of the site under project conditions considering the urban surroundings, the location of Pulgas Creek, and the addition of trees, and used that to extrapolate the potential for bird strike based on the design of the project buildings. While B1 was determined to have a low collision risk, bird-safe glazing was recommended on B2 based on its design and location. Similar standard recommendations have been provided for the buildings in Phases 2 and 3 based on preliminary site plans, which would effectively reduce collision risk in those phases as well.

Comment PTC-12 **[Commissioner Ellen Garvey]** Thank you that's all I have for now.

**[Chair Jim Iacoponi]** Thank you commissioner Garvey. Vice Chair?

**[Vice Chair Kristen Clements]** No nothing at this time, thank you.

**[Chair Jim Iacoponi]** Thank you. Commissioner Castaneda? No, okay. Thank you. Commissioner Roof?

**[Commissioner David Roof]** One more thing which is I think it's just a series of typos on page 6-6 regarding the protected trees. The thresholds are listed as greater than 24 or 30 inches in diameter and that's a very big tree. I think maybe it's supposed to be circumference.

**[Environmental Consultant Rebecca Auld]** I'll take a look at that.

**[Commissioner David Roof]** There's a guess but something's wrong there.

**[Chair Jim Iacoponi]** Thank you Commissioner Roof. So at this time we'll move to public comment.

Response PTC-12 See specific text revisions in Chapter 23 of this Final EIR document for correction of the mentioned tree measurements.

[Excerpt of transcript stops at 46:43, starts again at 50:11]

Comment PTC-13 **[Chair Jim Iacoponi]** Well thank you all. So let's start back with Commissioner Garvey and comments please. Your input to staff.

**[Commissioner Ellen Garvey]** A couple of follow-up questions. The construction mitigations for air quality and other things during the three phases of the project, I'm assuming that these three phases don't overlap, that there's phase one and then it's followed by phase two and then that's followed by phase three. Will the phases overlap, and does the EIR contemplate that in any way, if there was an overlap then there would be as an example more air pollution emissions coming from the project during that overlap or is there no possibility of an overlap in any of these phases and the mitigation measures contemplate that? Maybe we could address that in some fashion in the EIR just so that it's clear.

Response PTC-13 The analysis in the Draft EIR assessed a reasonable worst-case scenario conservatively looking at the fastest contemplated completion of construction activities and noted that slower construction or more phases would result in the same or lessened impacts (page 3-7 of the Draft EIR). That being said, as indicated in Chapter 22 of this Final EIR, some project revisions - including revised phasing - have now been proposed. The revised phasing has been assessed and as demonstrated in Table 22.2, a substantially similar amount of construction is proposed in the largest phase and would not change impact conclusions in the Draft EIR. At this time, overlapping phasing is not anticipated or reasonably foreseeable.

Comment PTC-14 **[Commissioner Ellen Garvey]** And my second comment relates to the 500 newly planted trees which sound wonderful and I was looking in the EIR. Very clear: there are three phases to this project. Less clear in the EIR is: when does the first tree get planted? There are aesthetic and environmental benefits that accrue from planting trees and it would be nice if we didn't have to wait till the end of phase three until the first tree got planted not that the EIR has to be really specific but if it could address it in some way, that some portion of the trees will be planted after each phase and the aesthetic and environmental benefits would accrue in some phased fashion, that would be helpful to address that in the EIR. Thank you and those are my only questions. Would you like also a closing comment now or later?

**[Chair Jim Iacoponi]** Yes, sure. Go ahead.

Response PTC-14 Landscaping, including tree planting, would occur as part of the phase in which it is located. The revised project description, as described in Chapter 22 of this Final EIR document, includes planting 306 trees as part of Phase 1. Additional trees would be planted in Phases 2 and 3. The areas included in each of the phases are shown on Figure 22.5 in this Final EIR.

Comment PTC-15 **[Commissioner Ellen Garvey]** All right. This was a very well done environmental impact report, in my opinion. I enjoyed reading through it. I thought it was very, very thorough. Two things, a lot of things jumped out at me. Two things I'll highlight this evening: during construction there's always heavy equipment. This heavy equipment is run on diesel fuel, this makes for air pollution emissions. I was very pleased to see the mitigation measure that these engines on these heavy duty construction equipment will be tier 4 generators or they'll be tier three generators with a level three California Air Resources Board diesel particulate filter. These are the most stringent controls you can have on a diesel generator and I was very pleased that the EIR contemplated this in evaluating the project. And also for greenhouse gas emissions, I note that this is an all electric project and the buildings are not going to be connected to the natural gas pipeline. So all in all I thought this was a job well done and I'm looking forward to the next phase of the project. Thank you.

**[Chair Jim Iacoponi]** Thank you Commissioner Garvey. Vice Chair Clements?

Response PTC-15 This is not a specific comment on the environmental analysis and no response is required in this EIR.

Comment PTC-16 **[Vice Chair Kristen Clements]** Thank you, Chair. Just a comment about the bird safe design. There is an attachment on the Alexandria project website that is pretty simple but one thing I thought was clever is that the design team removed selected trees from the landscape plan within the courtyards that are open in buildings one and three because they would most likely lead to bird collisions and because they're surrounded by a glazed glass. So I thought, this is a very interesting and well thought out, kind of design from start to finish. This is a complicated project as I said and I'll just repeat I thought that the EIR was very helpful. It wasn't just boiler plate, which I feel like sometimes EIRs come off as a lot of boiler plate. This was, I thought, very specific for this project in every kind of respect that I noticed. So it's not [unintelligible] I'm just saying it's easy to read and it was very specific about the project itself and again for instance the recitation not only that it met the BAAQMD greenhouse gas reduction thresholds and how that analysis was done but then just for informational purposes it then went through the city's climate mitigation action plan and which is far more elaborate and kind of very impressive actually as you look at all of those mitigations so I thought that that was well done. I was paying particular attention to the hydrology because we've had comments about flooding in the area and again analysis of that area I was gratified to see that it does, they acknowledge it does experience flooding but that it seems to be designed, the project proposal notes the design on flood proof buildings, flood flow factors and offsets and then features to protect the improvements that are built there so I was happy to read about all of that. Plus the trail along the creek being improved and raised so that that would not be subject to flooding worst case by 3 feet raise. So all in all I was supportive of the quality product on the EIR analysis and look forward to seeing the final version. Thanks.

**[Chair Jim Iacoponi]** Thank you, Vice Chair. Commissioner Casteneda?

Response PTC-16 This is not a specific comment on the environmental analysis and no response is required in this EIR.

Comment PTC-17 **[Commissioner Janet Castaneda]** Thank you. I had one more question and then I'll make my comments. On the tree removal, I see that there's some offsite tree removal and I'd like a further explanation of that, where those are. One is supposed to be perhaps one Heritage tree maybe near Pep Boys or something, so why are trees being removed off site?

**[Environmental Consultant Rebecca Auld]** We can answer in detail in the Final EIR. I believe, I don't have it at my fingertips, but that it's part of the creek work.

**[Commissioner Janet Castaneda]** Okay, I thought, I figured that's probably what it was.

**[Environmental Consultant Rebecca Auld]** Yeah, but we'll confirm in the Final.

Response PTC-17 The referenced off-site trees were indicated in the discussion of tree removals because of the indicated uncertain retention ability due to their proximity to the work in the creek, but they were not proposed for removal. The current plan set (see Chapter 22 of this Final EIR) also does not propose to remove any off-site trees. As is common practice, updated assessment of tree condition and retention ability would be completed when the phases progress and any necessary tree removal permits would be requested at that time.

Comment PTC-18 **[Commissioner Janet Castaneda]** Okay. I also think this was a very detailed report that was easy to understand and that the hydrology section was excellent. Very well explained. I really like the use of the swale with the inlet and outlet to the creek, I thought that that was a very good feature and the water flow through that's being allowed through the garages and taking into consideration the flood waters from the other properties located at 825 and 835 Industrial Road, how they were able to accommodate that I think is good and also the grade being above the 100-year flood plain. I'm really pleased about that. Let's see, I think I had one more. And of course I share the Commissioner's comments about this being a Green Building. I think this is really good and the idea of the placement of the buildings so that they present a solid view which will divert birds I think is really a very clever feature. Thank you.

**[Chair Jim Iacoponi]** Thank you Commissioner, and Commissioner Roof?

Response PTC-18 This is not a specific comment on the environmental analysis and no response is required in this EIR.

Comment PTC-19 **[Commissioner David Roof]** My area of concern is in the phased work and the potential impact on of having phase one be completed and then a delay before phase two and potentially another delay by the time we get to phase three and we probably should keep in mind there's always the possibility that phase three will never be done so the potential impact of partially completed facilities in terms of the flood control, the percolation water percolation systems etc etc what are the impacts of potentially years of years interval between the different phases the and one in addition to those specific examples I just gave, the Pulgas Creek work which I alluded to earlier, potential ecological impact of fixing half the creek and then coming back to it and

fixing the other half of the creek years later and also the availability of public access in the path whether there would be a delay in having that benefit come only in phase three so those are the area where I'd like to see addressed in the Final EIR.

Response PTC-19 The revised project description, as described in Chapter 22 of this Final EIR document, includes the Pulgas Creek improvements in Phase 2. Due to existing lease agreements, the Pulgas Creek restoration cannot be completed until after the vacancy of the existing tenant at 960 Industrial Road during Phase 2. The entire length of the Creek adjacent to the project site would be improved during this phase, as well as the public boardwalk along the creek, all subject to approval of the necessary permits and obtaining the necessary rights of entry and landowner consents for offsite work.

WRA completed an Updated Master Plan Pulgas Creek Flooding Analysis, as well as a Flood Mitigation Technical Memorandum (see Appendix K) for the revised project site plan as a whole and for the proposed Phase 1 plan separately, and concluded that both the revised project as a whole and Phase 1 individually would have a negligible effect on offsite flooding behavior and would reduce flooding on the project site.

Comment PTC-20 **[Commissioner David Roof]** My more general comment is I think this is a fantastic and valuable project for the community. It's a real positive addition to our city. I'm excited about it with the environmental benefits over the current state certainly and having a beautiful campus and improved Pulgas Creek and access to Pulgas Creek. Overall this is a very nice project to have happen in our city.

Response PTC-20 This is not a comment on the environmental analysis and no response is required in this EIR.

Comment PTC-21 **[Chair Jim Iacoponi]** Thank you Commissioner Roof and I think you've given me a couple of segues that will allow me to go a little more quickly but I would also say I think I'll start with, my lens was around this versus the Alternatives because I know that the public often asks "well why bother to do this at all?" and I really appreciated the, I think, 15 objectives for the project and how not only has the project been designed to achieve those objectives but also how the risks, the environmental risks as laid out in the document have been mitigated in such a way that they, the project is, will bring all of the benefits with very little cost, or at least cost to the public when it's all done, so that's great and I think the butt for me is as Commissioner Roof just said, which is the benefit of opening up Pulgas Creek and opening up the property to citizens of San Carlos might not happen for eight or 10 or 15 years and that just feels back weighted. So I know we're not commenting on the project itself but because there's a cost and benefit, we're going to get costs up front and benefits late and I would encourage a rethinking of how, particularly the creek but also maybe the bike lanes through might be more front loaded. I think it's also a, it will bring jobs, it will bring amenities, child care, and all with a very well thought through plan, again whose environmental impacts have been, to my read, well mitigated and so nothing further to request on the EIR from my point of view. So I think with that we've completed the agenda item.

Response PTC-21 This is not a comment on the environmental analysis and no response is required in this EIR.

[Transcript excerpt ends at 1:02:37]