# CEQA TRANSPORTATION ANALYSIS

# **A**TTACHMENT **E**

to the 841 Old County Road Project Initial Study / Mitigated Negative Declaration



January 17, 2023

Ms. Rebecca Auld Lamphier-Gregory 4100 Redwood Road, Suite 20A - #601 Oakland, California 94619

# 841 Old County Road CEQA Transportation Analysis

Dear Ms. Auld;

The proposed 841 Old County Road Project would include the redevelopment of approximately 3.5 acres into about 325,473 square feet of office and research and development in San Carlos. The purpose of this letter is to summarize this project's potential transportation impacts under the guidelines of the California Environmental Quality Act (CEQA).

# **Project Description**

It is our understanding that the proposed project would include removal of the existing landscaping and pet care commercial land uses at 803-851 Old County Road between Bransten Road and Commercial Street and construct 325,473 square feet of Life Sciences office space.

# **Trip Generation**

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 11<sup>th</sup> Edition, 2021. Because the site is currently occupied by a landscaping service provider (light industrial), a garden supply store, and pet care commercial land uses, the trip generation of the existing land uses was estimated and deducted. A review of available land use descriptions contained in the ITE manual indicates that the rates most closely aligned with the existing uses would be "General Light Industrial" (ITE LU #110), "Nursery (Garden Center)" (ITE LU #817) and "Day Care Center" (ITE LU#565). Similarly, the most appropriate trip generation rates for the proposed land uses include the application of both "General Office Building" (Land Use #710) and "Research and Development Center" (Land Use #760) based on gross floor area. For a conservative analysis, and to be consistent with other recently analyzed Life Sciences office projects in San Carlos, the higher daily trip generation rate for "Research and Development Center" and the peak hour trip generation rates for "General Office Building" were applied to approximate the number of vehicle trips generated by the proposed project based on the proposed square footage. The anticipated number of vehicle trips estimated by these rates are comparable to trip estimates using the assumption that the building would have an occupancy of approximately one employee per 300 square feet of office space or in this case an occupancy of approximately 1,085 employees.

The proposed project would be expected to increase vehicle trips, parking demand, traffic congestion, and vehicle emissions. Per Section 18.25.080 of the City of San Carlos municipal code, a Transportation Demand Management (TDM) Plan achieving a minimum 20-percent vehicle trip reduction is required for this project. To provide a conservative analysis, and to be consistent with other transportation studies in San Carlos, trip reductions associated with a TDM plan were not included with the trip generation estimates used for the VMT analysis or LOS analysis. Reductions associated with the TDM plan are discussed following CEQA conclusions.

Based on these assumptions, the proposed project is expected to generate an average of 3,606 daily trips, including 495 a.m. peak hour trips and 469 trips during the p.m. peak hour. This represents a net increase in trips over the existing land uses of 2,346 trips per day including 295 and 237 more trips during the a.m. and p.m. peak hours, respectively. These results are summarized in Table 1.

| Table 1 – Trip Generation Summary |         |        |       |       |              |     |     |              |       |     |     |
|-----------------------------------|---------|--------|-------|-------|--------------|-----|-----|--------------|-------|-----|-----|
| Land Use                          | Units   | Da     | ily   |       | AM Peak Hour |     |     | PM Peak Hour |       |     |     |
|                                   | (ksf)   | Rate   | Trips | Rate  | Trips        | ln  | Out | Rate         | Trips | ln  | Out |
| Existing                          |         |        |       |       |              |     |     |              |       |     |     |
| General Light Industrial          | 2.800   | 4.87   | -14   | 0.74  | -2           | -2  | 0   | 0.65         | -2    | 0   | -2  |
| Nursery (Garden Center)           | 6.800   | 68.10  | -463  | 2.43  | -17          | -9  | -8  | 6.94         | -47   | -23 | -24 |
| Pet Day Care Center               | 16.450  | 47.62  | -783  | 11.00 | -181         | -96 | -85 | 11.12        | -183  | -86 | -97 |
| Proposed                          |         |        |       |       |              |     |     |              |       |     |     |
| General Office Building           | 325.473 | 11.08* | 3,606 | 1.52  | 495          | 436 | 59  | 1.44         | 469   | 80  | 389 |
| Net New Trips                     |         |        | 2,346 |       | 295          | 329 | -34 |              | 237   | -29 | 266 |

Note: \* Rate applied is for a Research and Development Center; ksf = 1,000 square feet

# Trip Reduction/Transportation Demand Management (TDM) Plan

Per Section 18.25.030 of the City of San Carlos Municipal Code, a Transportation Demand Management (TDM) Plan is required that shall incorporate measures to meet vehicle trip generation rates that are 20 percent lower than the standard rates as established in the most recent edition of the Institute of Transportation Engineers (ITE) trip generation manual. In essence, this amounts to a 20 percent trip reduction in vehicle trips.

As proposed, the project would include a Transportation Demand Management (TDM) Plan that would include measures aimed at reducing trips to and from the site as well as the expected parking demand. Based on preliminary documents provided by the applicant, proposed TDM measures would include a private or public shuttle service, marketing and management strategies, on-site amenities, site improvements, incentive programs, and other items.

The proposed TDM measures were evaluated using the California Emissions Estimator Model (CalEEMod, version 2016.3.1). CalEEMod is a land use emissions model used to quantify potential emissions impacts associated with a variety of land use projects. The model quantifies direct emissions, including vehicle use, and indirect emissions, including energy and water use. The model was developed for California Air Pollution Control Officers Association (CAPCOA) and incorporates the mitigation measures outlined in *Quantifying Greenhouse Gas Mitigation Measures*, CAPCOA 2010. CalEEMod estimates vehicle travel as a function of land use and geographic location using ITE standard trip generation rates and trip length data collected from various jurisdictions around the State of California. Using this data, the CalEEMod model can determine the number of Vehicle Miles Traveled (VMT) for a given development. The underlying CAPCOA methodology limits VMT reductions based on the development's location. The proposed project site is in a suburban center area of San Carlos, where the overall maximum reduction allowed by the CAPCOA methodology is 20 percent. It should be noted that while CAPCOA limits the expected trip reduction, a potential 25 to 30-percent reduction was calculated based on the proposed TDM measures. While this estimate is larger than the cap imposed by CAPCOA, a maximum 20-percent trip reduction appears reasonable to apply to this project.

After deductions for both the TDM program and existing trips from removed buildings were applied, the project would be expected to generate 1,625 net-new daily trips, including 196 during the morning peak hour and 143 during the evening peak hour; these new trips represent the net increase in traffic associated with the project compared to existing volumes, as summarized in Table 2.

| Table 2 – Trip Generation Summary with 20 percent TDM Reduction |      |        |              |       |      |              |      |       |      |      |
|---|------|--------|--------------|-------|------|--------------|------|-------|------|------|
| Land Use  | Da   | aily   | AM Peak Hour |       |      | PM Peak Hour |      |       |      |      |
|   | Rate | Trips  | Rate         | Trips | In   | Out          | Rate | Trips | In   | Out  |
| Office  |      | 3,606  |              | 495   | 436  | 59           |      | 469   | 80   | 389  |
| TDM Reduction   | -20% | -721   | -20%         | -99   | -87  | -21          | -20% | -94   | -16  | -78  |
| Existing Trips Credit   |      | -1,260 |              | -200  | -107 | -93          |      | -232  | -109 | -123 |
| Total   |      | 1,625  |              | 196   | 242  | -46          |      | 143   | -45  | 188  |

# **Regulatory Setting**

This section describes federal, State, regional, and local environmental laws and policies that are relevant to the California Environmental Quality Act (CEQA) review process for transportation and circulation. These policies provide a context for the impact discussion related to the proposed project's consistency with the applicable regulatory conditions.

# **Federal Regulations**

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the US Access Board, an independent federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last decade. These guidelines, last revised in July 2011, address various issues, including roadway design practices, slope and terrain issues, and pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, public transit, and other components of public rights-of-way. These guidelines would apply to proposed roadways in the study area.

#### **State Regulations**

#### Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, supporting previous climate-focused and transportation legislation, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375) and the California Global Warming Solutions Act of 2006 (AB 32). SB 743 also supports implementation of the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users. To further the State's commitment to the goals of SB 375, AB 32 and AB 1358, SB 743 added Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code.

SB 743 introduced fundamental changes in the assessment of transportation impacts through the CEQA process. These changes include the elimination of auto delay (measured as Level of Service, or LOS) as a basis for determining significant transportation impacts. SB 743 included amendments that revised the definition of "infill opportunity zones" to allow cities and counties to opt out of traditional LOS standards established by congestion management programs (CMPs) and required the California Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines and establish "criteria for determining the significance of transportation impacts of projects within transit priority areas." As part of the new CEQA guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." SB 743-compliant CEQA analysis became mandatory on July 1, 2020. Since the CEQA transportation

analysis prepared for the Certified EIR predated SB 743, potentially significant impacts were defined differently at that time and VMT was not evaluated as is currently required.

In December 2018, OPR released a final advisory to guide lead agencies in implementing SB 743, the "Technical Advisory on Evaluating Transportation Impacts in CEQA." Key guidance includes:

- VMT is the most appropriate metric to evaluate a project's transportation impact under CEQA.
- Tour- and trip-based travel models are recommended for estimating VMT, but local agencies have the authority to select the tools they use.
- VMT for residential and office projects are generally assessed using efficiency metrics, i.e., on a "per rate" basis.
   Specifically, the adopted metrics used by the City of San Carlos are VMT per service population for both residential and office projects.
- The recommended threshold of significance for residential and office projects is VMT per capita or per employee that is fifteen percent below the city or regional average (whichever is applied). In other words, an office project that generates VMT per employee that is more than 85 percent of the regional VMT per employee could result in a significant impact. This threshold is in line with statewide GHG emission reduction targets.
- For retail projects, the recommended metric is the net change in total VMT in the study area as a result of the
  project. It is recommended that projects resulting in a net increase in VMT be considered as having a
  significant impact.
- Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those recommended in the advisory, provided they are based on substantial evidence.
- Cities and counties still have the ability to use metrics such as LOS for other plans, studies, or network monitoring. However, LOS and similar metrics cannot constitute the sole basis for CEQA impacts.

### California Complete Streets Act of 2008 (Assembly Bill 1358)

Originally passed in 2008, California's Complete Streets Act came into force in 2011 and requires local jurisdictions to plan for land use transportation policies that reflect a "complete streets" approach to mobility. "Complete streets" comprises a suite of policies and street design guidelines which provide for the needs of all road users, including pedestrians, bicyclists, transit operators and riders, children, the elderly, and the disabled. From 2011 onward, any local jurisdiction—county or city—that undertakes a substantive update of the circulation element of its general plan must consider "complete streets" and incorporate corresponding policies and programs.

#### **Regional Regulations**

#### Plan Bay Area 2040

Plan Bay Area 2040 was adopted in 2017 by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). As a single plan for the nine-county San Francisco Bay Area that includes the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), Plan Bay Area 2040 sets forth regional transportation policy and provides capital program planning for all regional, State, and Federally funded projects.

As the RTP, Plan Bay Area 2040 provides strategic investment recommendations to improve regional transportation system performance, including investments in regional highway, transit, local roadway, bicycle, and pedestrian facilities. These projects were identified through regional and local transportation planning processes. Plan Bay Area 2040 was the most current iteration of Plan Bay Area at the start of this study.

#### San Mateo County Comprehensive Bicycle and Pedestrian Plan

The Countywide Bicycle and Pedestrian Plan (CBPP) provides a framework to help the City/County Association of Governments of San Mateo County (C/CAG) improve walking and bicycle conditions in San Mateo County. By recommending a connected network of biking and walking facilities based on the best practices in the field, this Plan will make biking and walking safer and more comfortable for all, and improve health, accessibility, and livability throughout the county.

C/CAG is the County's Congestion Management Agency and is responsible for transportation planning, programming, and funding. This includes developing and updating the region's Congestion Management Plan and bicycle and pedestrian plans. This Plan builds on previous walking and bicycling planning efforts, including the San Mateo County Comprehensive Bicycle Route Plan (2000) and San Mateo County Comprehensive Bicycle and Pedestrian Plan (2011).

This Plan presents countywide priorities and provides project lists and program and design guidance which C/CAG and local jurisdictions can use to make roadways safer, reduce congestion, and encourage more people to walk and ride a bicycle.

#### Congestion Management Program

The 2021 Congestion Management Program (CMP) Update is a document of the City/County Association of Governments of San Mateo County (C/CAG), the designated Congestion Management Agency (CMA) for San Mateo County. The 2021 biennial update is required by State statute.

In 1990, California voters approved Propositions 111 and 108, which included a requirement that every urban county within California designate a CMA that would prepare, implement, and biennially update a CMP. In San Mateo County, C/CAG was designated as the CMA. Subsequent legislation (AB 2419) allowed existing Congestion Management Agencies to discontinue participation in the Program; however, C/CAG voted to continue to participate in and adopt a CMP.

According to the state legislation, the purpose of CMPs is to develop a procedure to alleviate or control anticipated increases in roadway congestion and to ensure that "federal, state, and local agencies join with transit districts, business, private and environmental interests to develop and implement comprehensive strategies needed to develop appropriate responses to transportation needs." The first CMP for San Mateo County was adopted by C/CAG in 1991. It has been updated and amended on a biennial basis. The last CMP update was in 2019.

#### Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) is the public agency tasked with regulating air pollution in the nine-county Bay Area, including San Mateo County. As a primary source of air pollution in the Bay Area region is from motor vehicles, air district regulations affect transportation planning in the project study area. The BAAQMD's goals include reducing health disparities due to air pollution, achieving, and maintaining air quality standards, and implementing exemplary regulatory programs and compliance with federal, State, and regional regulations.

## Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including San Mateo County. It also functions as the federally mandated metropolitan planning organization (MPO) for the region. It is responsible for regularly updating the Regional Transportation Plan (RTP), a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities.

#### **Local Regulations**

#### General Plan

The City of San Carlos General Plan Circulation & Scenic Highways Element (adopted October 2009) provides a framework for development within the City. Policies and strategies that are pertinent to the transportation analysis for the proposed project are summarized below:

- POLICY CSH-2.2 Continue to support operation of adequate public bus service throughout San Carlos.
- POLICY CSH-2.3 Access to public transportation facilities should be convenient and designed to encourage use of public transit.
- POLICY CSH-3.1 Strive to reduce baseline and development-related traffic by 20 percent through publicprivate partnership efforts.
- POLICY CSH-3.12 The City should preserve its existing alley and pedestrian path systems to the maximum
  extent feasible.
- POLICY CSH-3.2 Support city-wide efforts to reduce vehicular trips within and through the community.
- POLICY CSH-3.3 Support the incorporation of Transportation Demand Measures in new development to reduce traffic impacts.
- POLICY CSH-5.1 Connect neighborhoods, school sites, activity centers, transportation centers, recreational sites and other important community amenities with sidewalks, pedestrian paths, trails and bikeways.
- POLICY CSH-6.1 Bicycling and walking facilities should be incorporated into all new development projects to the maximum extent feasible.
- POLICY CSH-6.2 Support transit-oriented development with mixed, dense land use that reduces the need to travel and that is linked to good transit. The City shall work with local, regional and State representatives to encourage the support and funding of transit-oriented development projects.

#### Bicycle and Pedestrian Master Plan

The City of San Carlos Bicycle and Pedestrian Master Plan (adopted June 9, 2020) establishes a long-term vision for improving walking and bicycling in San Carlos and provides a strategy to develop a comprehensive bicycling and walking network that provides access to transit, schools and downtown. This document also identifies a plan to implement these projects and programs through prioritization and phasing to ensure projects are management and fundable.

This plan is an essential tool for guiding city staff and the development community in building a balanced transportation system where active modes are supported and accessible. The goal of the plan is to promote walking and bicycling through the creation of safe, comfortable, and connected networks, and to encourage alternatives to single-occupancy motor vehicle trips.

#### Transportation Significance Criteria

The City of San Carlos Transportation Significance Criteria was adopted by the City Council in September 2020. This adopted resolution aligns the City's transportation analysis procedures with state goals for climate change, active transportation, as well as the guidelines described in the Governor's Office of Planning and Research (OPR) for CEQA transportation analysis.

#### East Side Innovation District Vision Plan

The East Side Innovation District Vision Plan (adopted October 25, 2021) presents planning strategies, goals, principles, and action items to achieve the desired characteristics for the future East Side Innovation District area. This plan is meant to be used at the very beginning stages of project development to determine how a project

can be conceptualized and programmed so that a portion of the plan can be fulfilled with each act of new construction or public involvement.

#### **CEQA Checklist**

Following is a discussion and analysis of transportation related CEQA checklist items. The results are summarized in Table 3 and a discussion of each criterion follows.

| Tal | Table 3 – XVII. TRANSPORTATION/TRAFFIC  |                                      |   |                                    |              |  |  |  |
|-----|---|--------------------------------------|---|------------------------------------|--------------|--|--|--|
| Wo  | ould the Project:   | Potentially<br>Significant<br>Impact | Less than<br>Significant<br>Impact with<br>Mitigation | Less than<br>Significant<br>Impact | No<br>Impact |  |  |  |
| a)  | Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?        |                                      |   | Х                                  |              |  |  |  |
| b)  | Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?  |                                      |   | Х                                  |              |  |  |  |
| c)  | Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? |                                      |   | Х                                  |              |  |  |  |
| d)  | Result in inadequate emergency access?  |                                      |   | Х                                  |              |  |  |  |

#### **Discussion of CEQA Checklist Items**

a. Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The proposed project was evaluated to determine whether it would conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bicycle racks, Class IV bikeways, etc.) or generate pedestrian, bicycle, or transit travel demand that would not be accommodated by existing transit, bicycle, or pedestrian facilities and plans.

Employees traveling to and from the proposed project site would have the option of driving, taking transit, walking, or cycling.

#### **Pedestrian Facilities**

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the proposed project site; however, sidewalk gaps, obstacles, and barriers can be found along some of the roadways connecting to the project site. Existing gaps and obstacles along the connecting roadways can impact convenient and continuous access for pedestrians and present safety concerns in those locations where appropriate pedestrian infrastructure would address potential conflict points.

• **Old County Road** – Within the study area, continuous sidewalk coverage is provided on both sides Old County Road, except for the segment south of Montgomery Street where sidewalks are only available on the east side. Lighting is provided by overhead streetlights.

- Commercial Street Intermittent sidewalks currently exist on both sides of Commercial Street between Old
  County Road and Industrial Road. Lighting is provided by overhead streetlights. It is noted that a new sidewalk
  along the south side of Commercial Street between Old County Road and Industrial Road is anticipated to be
  completed by others.
- **Industrial Road** Continuous sidewalks are provided on Industrial Road within the vicinity of the proposed project. In general, Industrial Road has adequate pedestrian facilities including crosswalks, curb ramps, overhead streetlights, etc.
- Caltrain Pedestrian Tunnel A tunnel provides access under the above-grade Caltrain tracks, connecting El Camino and Old County Road. Access is restricted in the tunnel to pedestrians and cyclists only. The tunnel includes overhead lighting and is approximately 15 feet wide and 50 feet in length.

#### **Bicycle Facilities**

The Highway Design Manual, Caltrans, 2017, classifies bikeways into four categories:

- **Class I Multi-Use Path** a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- Class II Bike Lane a striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route** signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- Class IV Bikeway also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

In the project area, Class II bike lanes exist on Old County Road and Industrial Road. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area. Table 4 summarizes the existing and planned bicycle facilities in the project vicinity, as contained in the City of San Carlos Bicycle and Pedestrian Master Plan, 2020.

| Table 4 – Bicycle Facility Summary |       |                   |                       |                   |  |  |  |  |
|------------------------------------|-------|-------------------|-----------------------|-------------------|--|--|--|--|
| Status<br><i>Facility</i>          | Class | Length<br>(miles) | Begin Point           | End Point         |  |  |  |  |
| Existing                           |       |                   |                       |                   |  |  |  |  |
| Alameda De Las Pulgas              | II    | 1.5               | San Carlos Ave        | South City Limits |  |  |  |  |
| Brittan Ave                        | II    | 0.8               | Alameda De Las Pulgas | Elm St            |  |  |  |  |
| Industrial Rd                      | II    | 2.1               | North City Limits     | South City Limits |  |  |  |  |
| Old County Rd                      | II    | 1.0               | Terminal Wy           | South City Limits |  |  |  |  |
| San Carlos Ave                     | II    | 1.0               | Beverly Dr            | Elm St            |  |  |  |  |
| East San Carlos Ave                | IIIB  | 0.3               | Old County Rd         | Industrial Rd     |  |  |  |  |
| Arroyo Ave                         | III   | 0.8               | Tarmack Ave           | El Camino Real    |  |  |  |  |
| Cedar St                           | III   | 1.9               | Hull Dr               | North City Limits |  |  |  |  |
| Old County Rd                      | III   | 1.2               | North City Limits     | Terminal Wy       |  |  |  |  |
| San Carlos Ave                     | III   | 0.2               | Elm St                | Laurel St         |  |  |  |  |

| Table 4 – Bicycle Facility Summary |       |                   |                   |                   |  |  |  |  |
|------------------------------------|-------|-------------------|-------------------|-------------------|--|--|--|--|
| Status<br>Facility                 | Class | Length<br>(miles) | Begin Point       | End Point         |  |  |  |  |
| Planned                            |       |                   |                   |                   |  |  |  |  |
| Bransten-Commercial Path           | I     | 0.3               | Old County Rd     | Industrial Rd     |  |  |  |  |
| Pulgas Creek Path                  | I     | 0.3               | Old County Rd     | Industrial Rd     |  |  |  |  |
| Commercial St                      | ll II | 0.3               | Old County Rd     | Industrial Rd     |  |  |  |  |
| Arroyo Ave                         | IIIB  | 0.8               | Tamarack Ave      | El Camino Real    |  |  |  |  |
| El Camino Real                     | IV    | 2.0               | North City Limits | South City Limits |  |  |  |  |
| Old County Rd                      | IV    | 2.0               | North City Limits | South City Limits |  |  |  |  |
| Industrial Rd                      | IV    | 2.1               | North City Limits | South City Limits |  |  |  |  |

Source: City of San Carlos Bicycle and Pedestrian Master Plan, 2020

#### Proposed Project Improvements to Pedestrian and Bicycle Facilities

The proposed project includes numerous changes to the existing pedestrian and bicycle network. It is presumed that these new facilities would be designed and constructed to current City standards to accommodate both pedestrians and bicyclists. All proposed improvements would be within the public right-of-way and would enhance pedestrian and bicycle safety, comfort, and mobility within the vicinity of the project site, specifically providing improved and continuous access between the project site and transit stops including the San Carlos Caltrain Station and SamTrans bus stops along El Camino Real. These improvements are also consistent with local policies and ordinances. A summary of these changes is provided below.

- Demolish and reconstruct the sidewalks along the project frontages along Bransten Road, Commercial Street and Old County Road. This would include ADA-compliant curb ramps and improved sidewalks.
- Construct a new Class IV Bikeway along the western side of Old County Road between Bransten Road and Commercial Street. It is noted that Old County Road north of Bransten Road would remain a Class III Bike Route until additional portions of the Old Country Road Class IV Bikeway is completed by others.
- Establishment of a bicycle crosswalk across Old County Road at the intersection of Old County Road/Bransten Road that connects the future Class IV Bikeway on Old County Road with Bransten Road.

Detailed design of the transition between the Class IV Bikeway to Class II bike lanes at the intersection of Old County Road and Bransten Road is currently undergoing a review and refinement process by City staff and as such has not been finalized, and therefore is not included with this evaluation. Upon completion of the review and refinement process, the design of this bicycle facility transition is not expected to substantially increase hazards due to a geometric design feature or incompatible use.

#### **Transit Facilities**

During the 2020-2022 Coronavirus (COVID-19) Global Pandemic, transit agencies throughout the San Francisco Bay Area have significantly reduced the amount of service provided. This includes the number of routes and bus stops serviced, the frequency of buses and trains, and the truncation of service hours. The addition of project-generated demand is generally expected to incrementally increase the use of transit within the study area. The additional transit trips would be spread out during the day, and also over several SamTrans bus lines and Caltrain rail service. The following is a snapshot of existing conditions, and it is noted that transit providers regularly update services in response to changing levels of transit demand.

#### Sam Trans

The San Mateo County Transit District (SamTrans) provides fixed route bus service in San Carlos and throughout San Mateo County. SamTrans buses are equipped with the bike racks that can carry three bicycles. Bike rack space is on a first come, first served basis and riders must be able to load and unload their bicycles without any help from the operator. Two additional bicycles are allowed on SamTrans buses at the discretion of the driver and depending on passenger loads.

**Route 397** provides service between San Francisco and Palo Alto with stops on El Camino Real in San Carlos. Route 397 operates seven days a week with 60-minute headways. The northbound route operates three buses between 12:46 a.m. and 4:54 a.m., while the southbound route operates four buses from 1:15 a.m. to 6:37 a.m. This route does not operate midday or in the evening. The bus stop nearest the project site is at the intersection of El Camino Real/Brittan Avenue, located approximately 0.1 miles from the project site.

**Route 398** provides service between San Francisco and Redwood City along El Camino Real within San Carlos. Route 398 operates seven days a week with approximately 60-minute headways between 5:10 a.m. and 11:27 p.m. on weekdays, and around 6:00 a.m. to 11:00 p.m. on weekends. The bus stop nearest the project site is at the intersection of El Camino Real/Brittan Avenue, located approximately 0.1 miles from the project site.

**Route ECR** provides service between the Daly City BART station and Palo Alto with stops on El Camino Real within the study area. Route ECR operates seven days a week with 15- to 20-minute headways between 4:00 a.m. and 1:30 a.m. on weekdays and 30-minute headways between around 5:00 a.m. and 2:00 a.m. on weekends. The bus stop nearest the project site is at the intersection of El Camino Real/Brittan Avenue, located approximately 0.1 miles from the project site.

Redi-Wheels and RediCoast, also known as paratransit or door-to-door service, are available for those who are unable to independently use the transit system due to a physical or mental disability. Redi-Wheels is designed to serve the needs of individuals with disabilities within SamTrans and the greater San Carlos area. Trips must be scheduled at least one day in advance.

#### Caltrain

Caltrain is the commuter rail line serving the San Francisco Peninsula. It connects San Carlos with San Francisco to the north and San Jose and Gilroy to the south. On weekdays there are 56 trains servicing the San Carlos Station in the northbound and southbound directions, 15 of which provide limited-stop, express service. On weekends there are 12 trains that stop at the station in each direction on Saturdays, and 10 trains in each direction on Sundays. The San Carlos Caltrain Station is located just east of El Camino Real/San Carlos Avenue, approximately 0.46 miles from the project site. Both bicycle racks and lockers are provided at the San Carlos station. Bicycle racks are available on a first-come-first-served basis, while lockers must be reserved. Furthermore, paid vehicle parking is available at the station for riders.

#### On-Demand Transportation Services

On-demand private vehicle services (e.g., taxi, Uber, Lyft, etc.) are available in the study area 24 hours a day. These vehicles can be used for trips within the study area and farther destinations, including nearby airports and major transit stations.

#### **Effect on East San Carlos Residential Streets**

The City has separately been working with the East San Carlos Neighborhood to quantify and project existing and future cut-through traffic and potential measures to reduce such traffic as requested by concerned neighbors.

That process will continue to proceed separately, but the following statement demonstrates that cut-through traffic would not represent an environmental impact under CEQA for this project.

The City of San Carlos Neighborhood Traffic Management Program (NTMP) defines a local street as a low-speed, low-volume roadway that provides direct and full access to abutting land uses. These streets typically have two travel lanes with parking on both sides and daily traffic volumes of less than 1,200 vehicles per day.

The proposed project would generate 2,346 new daily vehicle trips, including 295 a.m. and 237 p.m. trips during the peak hours. In addition, the project would be required to implement a TDM program that would reduce the number of trips by at least 20 percent. Based on the projected trip distribution pattern and likely paths of travel, 61 percent of project trips would use the segments of either Old County Road or Industrial Road between Holly Street and Commercial Street to access the project site. Of these project trips, approximately 4.3 percent would be projected to use local residential streets to travel between Old County Road and Industrial Road within the area bounded by Old County Road, East San Carlos Avenue, Industrial Road, and Terminal Way, even in the absence of measures under consideration to reduce residential cut-through traffic. Based on the volume of added traffic in this area the proposed project would not substantially increase hazards due to a geometric design feature, nor result in inadequate emergency access. Furthermore, the addition of project-related traffic to existing volumes along these local streets are not predicted to exceed the 1,200 vehicle per day definition for a local street. Therefore, the addition of project-related vehicle trips to local streets would not conflict with the standards described in the NTMP.

**Finding -** Pedestrian, bicycle, and transit facilities, including those to be constructed with the proposed project, would be adequate to serve the project as proposed, based on the existing and proposed network of pedestrian, bicycle and transit facilities within the study area.

Additionally, the project would not conflict with any current programs, plans, ordinances, or policies addressing the circulation system. Therefore, the proposed project would be expected to have a less-than-significant impact on local programs, plans, ordinances, or policies.

b. Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Senate Bill (SB) 743 established the potential increase in Vehicle Miles Traveled (VMT) associated with a project as the basis for determining transportation impacts of development projects. Guidance provided by both the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory* (2018) and the City of San Carlos' *Transportation Significance Criteria Implementing Vehicle Miles Traveled* (2020) was used.

OPR proposes that an office project exceeding a level of 15 percent below the existing regional VMT per service population may indicate a significant transportation impact. For the purposes of this analysis, Research and Development (R&D) and Life Science uses are considered similar to office projects, as they are employment uses with similar travel patterns. The OPR publication, as well as CEQA Guidelines Section 15064.3(b)(1), also indicate that "generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." However, City of San Carlos policy states that office, commercial and mixed-use projects that are within one-half mile of transit have the potential to increase VMT, depending on the land use, scale of the project, and tenant. As such, office, commercial and mixed-use projects that generate more than 100 daily trips should be evaluated.

According to the walkshed map provided with the City's Transportation Significance Criteria, this project site is located within the half-mile walkshed of the El Camino Real transit corridor and is also located just beyond the designated Priority Development Area and Transit Priority Area surrounding the San Carlos Caltrain Station. While this would qualify the project for screening under the OPR guidance, City policy requires consideration of VMT

impacts for all office, commercial and mixed-use projects that generate more than 100 daily trips. Therefore, a quantified VMT analysis is included below.

A VMT analysis was conducted for the proposed project, per 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. Based on data from this model, San Mateo County has a Countywide average VMT for the existing 2019 year of 17.0 miles per service population. Applying the previously described guidance, an office project generating a VMT that is 15 percent or more below this value, or 14.5 miles per service population or less, would have a less-than-significant VMT impact. A summary of the VMT analysis results is enclosed.

This project as forecasted by the C/CAG-VTA Bi-County model would have an average VMT of 15.2 miles per service population in the 2040 cumulative plus project scenario. A Transportation Demand Management (TDM) program includes measures which can reduce the need for vehicle travel by employees of the proposed project. The TDM program proposed for this project is required per City of San Carlos Municipal Code Section 18.25.03 and is expected to reduce project-trips by 20 percent as well as the project-VMT by 20 percent according to calculations developed for CAPCOA. Successful implementation of the project's proposed TDM program would be expected to reduce VMT and would result in the project having a less-than-significant VMT impact. A summary of VMT reductions attributable to TDM is provided in Table 5 and a summary of the VMT analysis findings is provided in Table 6.

| Table 5 – Summary of VMT Reduction Attributable to Proposed TDM Measures |   |                           |  |  |  |  |  |  |
|--|---|---------------------------|--|--|--|--|--|--|
| Measure  | Description   | Approximate VMT Reduction |  |  |  |  |  |  |
| Carpool and Vanpool<br>Programs  | Rideshare matching service and incentives   | -8.0%                     |  |  |  |  |  |  |
| Transit Subsidies  | Assumes a full transit subsidy  | -5.5%                     |  |  |  |  |  |  |
| TDM Administration and<br>Promotion                                      | Transportation coordinator, commute trip reduction marketing, annual monitoring, online kiosk and information packets | -4.0%                     |  |  |  |  |  |  |
| Bicycle and Pedestrian<br>Amenities                                      | Showers and lockers, bike lockers, bike repair stations, etc.   | -2.7%                     |  |  |  |  |  |  |
| Modified Work<br>Schedules/Telecommuting                                 | Assumes 10% of employees work a 4/40 schedule   | -1.5%                     |  |  |  |  |  |  |
| Guaranteed Ride Home   |   | Supportive                |  |  |  |  |  |  |
| Total  |   | -21.7%                    |  |  |  |  |  |  |
| Dampened <sup>1</sup>  |   | -20.0%                    |  |  |  |  |  |  |

<sup>&</sup>lt;sup>1</sup> Total reduction is dampened to 20.0% (per application of calculation methodologies) to reflect diminishing effectiveness of combined measures

| Table 6 – Vehicle Miles Traveled Analysis Summary |                      |  |                     |                                   |                           |  |  |  |  |
|---|----------------------|--|---------------------|-----------------------------------|---------------------------|--|--|--|--|
| VMT Metric  | Baseline<br>VMT Rate | Significance<br>Threshold<br>(15% below<br>Baseline) | Project<br>VMT Rate | Project<br>VMT Rate<br>(with TDM) | Significance              |  |  |  |  |
| Employment-based VMT per<br>Service Population    | 17.0                 | 14.5   | 15.2                | 12.2                              | Less-Than-<br>Significant |  |  |  |  |

Note: VMT Rate is measured in VMT per Service Population; Project Reduced VMT Rate is 15.2 less 20% = 12.2

The TDM Plan shall be prepared and implemented that includes, at a minimum, the following elements:

- 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.
- 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.
- 3. Prior to the issuance of the first certificate of occupancy for the project, the TDM Plan must be completed and approved by the City of San Carlos. The project's designated Transportation Coordinator must provide a description and evidence of the programmatic TDM measures to be implemented and facilitate a site inspection by City staff to confirm that all approved physical measures in the project's TDM Plan are implemented and/or installed.
- 4. The TDM Plan monitoring will be completed by an independent consultant per Municipal Code Section 18.25.080. Regular monitoring will be necessary to ensure that the implemented TDM measures are effective and achieve the stated 20-percent trip reduction and 20-percent VMT reduction goal.
- 5. Consistent with common traffic engineering data collection principles, traffic conditions will be monitored annually by means of daily and a.m. and p.m. commute hour driveway counts at each project access point. The counts will include daily as well as peak hour traffic counts to be collected between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m. 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.
- 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.
- 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 goal of a 20-percent trip reduction and 20-percent VMT reduction are being met. This will be assessed by comparing the driveway counts to the trip targets identified in this report.
- 8. For the life of the project, a monitoring form must be completed and approved on an annual basis to verify that both vehicle trip and VMT reduction goals per phase 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 Planning Director for approval within 60 calendar days of the report submittal. The Planning Director shall review the list of modifications and may also recommend modifications to the TDM Plan, as appropriate, 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.

- 9. If the project continues to not achieve the applicable targets, the City shall have the option to withhold the issuance of building permits, certificates of occupancy, and other City issued permits or licenses, or require the applicant to enact other measures as appropriate to achieve a minimum of 20-percent trip reduction on a daily, a.m. peak hour and p.m. peak hour basis or the necessary VMT reduction goal.
- 10. Within three months prior to the occupancy of future phases of development, the applicant must submit an updated monitoring form. If the project does not achieve the applicable targets set for each phase, the City shall have the option to withhold the issuance of building permits, certificates of occupancy, and other City issued permits or licenses for the future phase of development.

**Finding** – The project, including implementation of its TDM Plan, would be expected to have a VMT rate which is lower than the threshold of 14.5 VMT/service population (15 percent below the Countywide average of 17.0), which would result in a less-than-significant VMT impact.

c. Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

#### **Site Access**

Vehicles would enter and exit the project site from driveways located on Commercial Street and Bransten Road. Each driveway would provide full access allowing for both left- and right-hand turns. The driveways on Commercial Street and Bransten Road would be located approximately 200 and 310 feet east of Old County Road, respectively. Each driveway would access the proposed garage structure as well as the main internal roadway that extends between Commercial Street and Bransten Road.

Pedestrian access to the building would be provided via various pedestrian entrances facing Old County Road, Bransten Road and Commercial Street. The network of walkways surrounding each building would provide access to the ground floor plaza between the North and South Buildings.

A vehicle queue analysis was conducted and indicated that the vehicle storage for the westbound (Commercial Street) approach to the Old County Road/Commercial Street intersection is expected to extend beyond the proposed driveway location under the cumulative condition. This queue would potentially block access to the site driveway on Commercial Street during peak hours. However, in the event the driveway is blocked, motorists would access the site via the Bransten Road driveway. As such, the queue on Commercial Street would not be a significant impact.

#### **Sight Distance**

At driveways, a substantially clear line of sight should be maintained between the driver of a vehicle waiting to enter the street and the driver of an approaching vehicle. Sight distances along Industrial Road at the project driveway were evaluated based on sight distance criteria contained in the *Highway Design Manual* published by Caltrans. The recommended sight distances for driveway approaches are based on stopping sight distance and use the approach travel speed as the basis for determining the recommended sight distance. The posted speed limit for Commercial Street and Bransten Road are both 25 mph. Based on these speed limits, the minimum stopping sight distance required would be 150 feet along both Commercial Street and Bransten Road. These roads are relatively flat and straight with favorable sight lines along the project frontage. A review of publicly available

aerial photographs shows that sight distances at each proposed project driveway location would extend up to 400 feet. Therefore, the sight distance for motorists exiting either project driveway is adequate since the available sight distance is greater than the 150 feet required.

For a motorist traveling along either eastbound Commercial Street or westbound Bransten Road intending to turn left into a project driveway, the stopping sight distance either looking east along Commercial Street or west along Bransten Road also extends up to 400 feet, which also exceeds the required 150 feet and is more than adequate for the posted speed limit of 25 mph.

The posted speed limit on Old County Road is 35 mph and the recommended sight distance is 250 feet. For a driver traveling on Old County Road in either direction approaching the bicycle crossing at the intersection of Bransten Road/Old County Road there is a stopping sight distance of 500 feet in each direction, which is more than adequate for the posted speed limit.

**Finding** – The project must be designed to meet applicable Federal, State and City codes and regulations, and as a result would not introduce any new hazards in terms of its design. Adequate sight lines would be provided at each of the proposed project access points. All roadway modifications proposed by the project would be designed and constructed to meet current City standards and therefore would have no impact in terms of potentially increasing hazards related to design features. The project also proposes to modify various elements of the transportation network including changes to adjacent sidewalks, crosswalks, bicycle facilities and travel lanes within the study area. However, the proposed project would not increase hazards due to geometric design features and would have a less-than-significant impact regarding geometric design features or incompatible uses.

Would the Project result in inadequate emergency access?

# **Emergency Access**

All driveways and internal roadways would be designed and constructed to current City standards to accommodate both passenger and emergency vehicles. Emergency response vehicles would be able to access the site via driveways on Commercial Street and Bransten Road as illustrated on the plan sheets (C5.0) enclosed. Since all roadway users must yield the right-of-way to emergency vehicles when using their sirens and lights, the added project-generated traffic would not impact access for emergency vehicles.

**Finding** – The project would result in a less-than-significant impact regarding adequacy of emergency access since all driveways and internal roadways would be designed to accommodate emergency vehicles and all roadway users must yield to emergency vehicles when using their lights and sirens.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,

Kenneth Jeong, PE Senior Engineer

MES/kbj/SCA028.L1

PROFESSIONATE OF CALIFORNIA OF

Mark Spencer, Pl Senior Principal

Enclosures: VMT Analysis Summary, Preliminary Fire Access Plan Sheet C5.0

Table 1: VMT Results

| Location   | Population | Employment | VMT_HH      | VMT_EMP    | VMT Per<br>Service | VMT/Service Pop | Mitigated<br>VMT | Mitigated VMT        |
|--|------------|------------|-------------|------------|--------------------|-----------------|------------------|----------------------|
|  |            |            |             |            |                    |                 | (15% below)      | Required by TDM Plan |
| 2019 - No-Project & 831 Old<br>County Rd Project |            |            |             |            |                    |                 |                  |                      |
| Old County TAZ 2013                              | -          | -          | -           | -          | -                  | -               | -                | -                    |
| City   | 32,432     | 20,955     | 511,366     | 398,674    | 910,040            | 17.0            |                  |                      |
| County   | 781,121    | 383,605    | 12,375,840  | 7,468,941  | 19,844,781         | 17.0            | 14.5             |                      |
| Region   | 7,738,947  | 3,848,620  | 120,601,346 | 66,743,539 | 187,344,885        | 16.2            |                  |                      |
| 2040 - No-Project                                |            |            |             |            |                    |                 |                  |                      |
| Old County TAZ 2013                              | -          | -          | -           | -          | -                  |                 |                  |                      |
| City   | 32,526     | 18,934     | 535,440     | 373,655    | 909,095            | 17.7            |                  |                      |
| County   | 928,919    | 478,336    | 14,027,506  | 9,760,791  | 23,788,297         | 16.9            |                  |                      |
| Region   | 9,662,080  | 4,717,488  | 154,521,640 | 83,687,638 | 238,209,278        | 16.6            |                  |                      |
| 2040 - 803 Old County Rd -<br>Project (TAZ 2013) |            |            |             |            |                    |                 |                  |                      |
| Old County TAZ 2013                              | -          | 1,085      | 0           | 16,544     | 16,544             | 15.2            | 0.8              | (5%)                 |
| City   | 32,526     | 25,618     | 526,955     | 493,441    | 1,020,395          | 17.5            |                  |                      |
| County   | 928,917    | 485,008    | 13,994,807  | 9,890,024  | 23,884,831         | 16.9            |                  |                      |
| Region   | 9,662,080  | 4,723,088  | 154,257,511 | 83,587,956 | 237,845,468        | 16.5            |                  |                      |

