



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

Jun 18 2020

June 18, 2020

STATE CLEARINGHOUSE

Ms. Adena Friedman, Senior Planner
City of South San Francisco, Economic and Community Development
315 Maple Street
South San Francisco, CA 94080
adena.friedman@ssf.net

Subject: Southline Specific Plan, Notice of Preparation of a Draft Environmental Impact Report, SCH #2020050452, City of South San Francisco, San Mateo County

Dear Ms. Friedman:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) prepared by the City of South San Francisco for the Southline Specific Plan (Project) located in the County of San Mateo. CDFW is submitting comments on the NOP regarding potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (e.g., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT LOCATION

The Project is located at an approximately 26.5-acre site located on South San Francisco's southern boundary with the City of San Bruno, at the intersection of South Maple Avenue and Tanforan Avenue, approximately 0.1 mile from the San Bruno BART Station and approximately 0.75 miles from the San Bruno Caltrain Station. The Project site includes Assessor's Parcel Numbers (APNs) 014-250-090, 014-250-080, 014-250-050, 014-241-030, 014-241-040, 014-232-030, and 014-232- 050.

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PROJECT DESCRIPTION SUMMARY

The Project involves constructing a new office/research development campus with maximum building area of up to 2.8 million square feet. The Project involves demolishing all existing on-site buildings and constructing the following: seven office buildings, an amenities building totaling 88,200 square feet, underground parking, a nine-story parking structure, a connection road, supporting utilities, and approximately 369,000 square feet of open space. Building height will reach a maximum of 120 feet.

Off-site improvements will involve the following: reconfiguration of South Linden Avenue and Dollar Avenue intersection as well as the existing at-grade rail crossing at South Linden Avenue, roadway widening of South Maple Avenue, and the signalization of multiple intersections within the Project boundary.

ENVIRONMENTAL SETTING

The special-status species that have the potential to occur in or near the Project area, include, but are not limited to:

- hoary bat (*Lasiurus cinereus*)
- Alameda song sparrow (*Melospiza melodia pusillula*); Species of Special Concern
- common birds

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the City of South San Francisco in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on biological resources.

COMMENT 1: Full Project Description of Project Features

The CEQA Guidelines (§§15124 and 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and require that it contain sufficient information to evaluate and review the Project's environmental impact.

To fully address the Project's impacts to fish and wildlife resources. Please include complete descriptions of the following features within the draft EIR, if applicable:

- Detailed description of all vegetation that will be removed, including the DBH and species of all trees that will be removed.
- Introduction of sources of light and glare into habitat areas;
- Stormwater or effluent drainage outlet systems; and

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- Detailed description of all proposed work (e.g., crossing improvements, repairs, etc.) at and within stream crossings (if applicable).

COMMENT 2: Nesting Birds

If there will be impacts and/or disturbances to vegetation on-site, CDFW encourages Project implementation outside of the bird nesting season, which extends from February through early September. However, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season, the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or Fish and Game Code.

To evaluate and avoid for potential impacts to nesting bird species, CDFW recommends incorporating the following mitigation measures into the draft EIR, and that these measures be made conditions of approval for the Project.

Recommended Mitigation Measure 1: Nesting Bird Surveys

CDFW recommends that a qualified avian biologist conduct pre-activity surveys for active nests no more than seven (7) days prior to the start of ground or vegetation disturbance and every fourteen (14) days during Project activities to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. Prior to initiation of ground or vegetation disturbance, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once Project activities begins, CDFW recommends having the qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

Recommended Mitigation Measure 2: Nesting Bird Buffers

If continuous monitoring of identified nests by a qualified avian biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the Project site

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would be concealed from a nest site by topography. CDFW recommends that a qualified avian biologist advise and support any variance from these buffers.

Comment 3: Roosting Bats

Hoary bats (*Lasiurus cinereus*) are known to potentially occur within and surrounding the Project site. To evaluate and avoid potential impacts to bat species, CDFW recommends incorporating the following mitigation measures into the Project's draft EIR and requiring these measures as conditions of approval for the Project.

Recommended Mitigation Measure 3: Bat Habitat Assessment

To evaluate Project impacts to bats, a qualified bat biologist should conduct a habitat assessment for bats at work sites seven (7) days prior to the start of Project activities and every 14 days during Project activities. The habitat assessment shall include a visual inspection of features within 50 feet of the work area for potential roosting features (bats need not be present). Habitat features found during the survey shall be flagged or marked.

Recommended Mitigation Measure 4: Bat Habitat Monitoring

If any habitat features identified in the habitat assessment will be altered or disturbed by Project activities, the qualified bat biologist should monitor the feature daily to ensure bats are not disturb, impacted, or fatalities are caused by the Project.

Recommended Mitigation Measure 5: Bat Project Avoidance

If bat colonies are observed at the Project site, at any time, all Project activities should stop until the qualified bat biologist develops a bat avoidance plan to be implement at the Project site. Once the plan is implemented, Project activities may recommence.

Lake and Streambed Alteration Program

Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has

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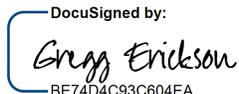
complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code, Section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

Thank you for the opportunity to comment on the Project's NOP. If you have any questions regarding this letter or for further coordination with CDFW, please contact Ms. Mia Bianchi, Environmental Scientist, at (707) 210-4531 or mia.bianchi@wildlife.ca.gov; or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at (707) 576-2786 or randi.adair@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Gregg Erickson
Regional Manager
Bay Delta Region

cc: State Clearinghouse # 2020050452