

CEQA TRANSPORTATION ANALYSIS

ATTACHMENT D

to the
888 Bransten Road Project Initial Study / Mitigated Negative Declaration



December 8, 2022

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

888 Bransten Road CEQA Transportation Analysis

Dear Ms. Auld;

The proposed project would include the redevelopment of the site at 888 Bransten Road in San Carlos, which is currently occupied by industrial uses, into office and research and development uses. 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

The proposed project would include demolition of the existing industrial and auto-care buildings totaling 56,900 square feet on the site located at 888 Bransten Road and construction of 105,416 square feet of Life Sciences office space. The proposed parking includes 88 spaces on-site, 177 spaces across from the site at 845 Bransten Road, 14 motorcycle spaces and 41 bicycle spaces.

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*, 11th Edition, 2021. Because the site is currently occupied by industrial and auto-care land uses, the trip generation of the existing land uses was estimated and deducted to arrive at net new trips. 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) and "Automobile Care Center" (ITE LU 942). 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. To be conservative and 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 that would be 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 in the trip generation estimates used for the LOS analysis.

Based on these assumptions, the proposed project is expected to generate an average of 1,168 daily trips, including 160 a.m. peak hour trips and 152 trips during the p.m. peak hour. This represents a net increase in trips over the existing land uses of 779 trips per day including 106 and 97 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 (ksf)	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing											
General Light Industrial	49.500	4.87	-241	0.74	-37	-33	-4	0.65	-32	-5	-27
Auto Care Center	7.400	20.00*	-148	2.25	-17	-11	-6	3.11	-23	-11	-12
Subtotal Existing Trips			-389		-54	-44	-10		-55	-16	-39
Proposed											
General Office Building	105.416	11.08**	1,168	1.52	160	141	19	1.44	152	26	126
Net New Trips			779		106	97	9		97	10	87

Note: ksf = 1,000 square feet; * = based on SANDAG rates since ITE does not provide a daily rate; ** Rate applied is for a Research and Development Center

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 reduction in vehicle trips.

As proposed, the project would include a TDM Plan that would include measures aimed at reducing trips to and from the site as well as the expected parking demand. Unfortunately, the projected effectiveness of the TDM plan could not be assessed since a copy is not currently available for review.

However, to comply with the requirements as stated in City code, a 20-percent trip reduction was calculated for informational purposes only. After deductions for both the TDM program and existing trips from removed buildings were applied, the project would be expected to generate 545 net-new daily trips, including 74 during the morning peak hour and 67 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. To be conservative, trip reductions related to the TDM program were not applied for the operational analysis.

Table 2 – Trip Generation Summary with 20 percent TDM Reduction

Use	Daily		AM Peak Hour				PM Peak Hour			
	Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
<i>Project</i>		1,168		160	141	19		152	26	126
<i>TDM Reduction</i>	-20%	-234	-20%	-32	-28	-4	-20%	-30	-5	-25
<i>Existing Trips Credit</i>		-389		-54	-44	-10		-55	-16	-39
Total		545		74	69	5		67	5	62

Regulatory Setting

This section describes federal, State, regional, and local environmental laws and policies that are relevant to the 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 "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.

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 congestion-related metrics are no longer considered 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 time when this study was initiated.

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 public-private 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 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.

Table 3 – XVII. TRANSPORTATION/TRAFFIC

Would the Project:	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

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 connected network of sidewalks, crosswalks, pedestrian signals, and curb ramps provides access for pedestrians in the vicinity of the 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.

- **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.
- **Bransten Road** - Sidewalks currently do not exist along the project frontage on Bransten Road but would be installed as part of the project.

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.

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*. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area. Planned improvements include Class IV bikeways on Industrial Road, Old County Road, and El Camino Real.

Status Facility	Class	Length (miles)	Begin Point	End Point
Existing				
<i>Industrial Rd</i>	II	2.60	Harbor Blvd	South City Limits
<i>Old County Rd</i>	II	0.90	300 ft north of Bransten Rd	Bing St
<i>Old County Rd</i>	III	1.50	North City Limits	300 ft north of Bransten Rd
<i>Brittan Ave</i>	IIIB	0.50	Industrial Rd	Elm St
<i>E. San Carlos Ave</i>	IIIB	0.25	Industrial Rd	Old County Rd
Planned				
Commercial Rd	II	0.25	Industrial Rd	Old County Rd
Old County Rd	IV	2.00	North City Limits	South City Limits
Industrial Rd	IV	2.10	North City Limits	South City Limits
El Camino Real	IV	2.00	North City Limits	South City Limits
Arroyo Ave	IIIB	0.80	Tamarack Ave	El Camino Real
Cedar St	IIIB	1.90	North City Limits	South City Limits

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

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 over several SamTrans bus lines as well as Caltrain rail service. 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.

SamTrans

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 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. The SamTrans bus stop nearest the project site is at the intersection of El Camino Real/Arroyo Avenue, approximately one-half mile from the project site, and is served by three routes.

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.

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.

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.

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. 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 at 599 El Camino Real, approximately 0.6 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. 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 779 new daily vehicle trips, including 106 a.m. and 97 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 would be adequate to serve the project as proposed with the inclusion of new sidewalk along the project site's frontage, 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, and 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 indicates 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. 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 that is part of the City's Transportation Significance Criteria, the westernmost portion of the project site is located within the half-mile walkshed of the El Camino Real transit corridor.

A VMT analysis was conducted for the proposed 888 Bransten Road 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" year of 2019 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.

This project would be located within Traffic Analysis Zone (TAZ) 2013 and is forecasted by the C/CAG-VTA Bi-County model to 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 both project-trips and VMT by at least 20 percent. 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 the VMT analysis findings is provided in Table 5 and a worksheet showing the VMT model results is enclosed.

Table 5 – Vehicle Miles Traveled Analysis Summary					
VMT Metric	Baseline VMT Rate	Significance Threshold (15% below Baseline)	Project VMT Rate	Project VMT Rate (with TDM)	Significance
Employment-based VMT per Service Population	17.0	14.5	15.2	12.2	Less-Than-Significant

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

A 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 who 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 and VMT reduction goal.
5. Consistent with common traffic engineering data collection principles, traffic conditions will be monitored annually by means of counts at each project access point. The counts will include daily as well as peak hour data 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 and 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 of withholding 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

The project includes a surface parking lot which would be accessed from Bransten Road via a driveway located within the cul-de-sac at the eastern terminus of Bransten Road. This project also includes the removal of seven existing driveways serving the previous land uses, reducing the site's total number of vehicular access points from seven to one.

Pedestrian access to the building would be provided at the main entrance facing Bransten Road and a rear entrance facing the surface parking lot. New sidewalks are also proposed along the project site frontage on Bransten Road.

Sight Distance

At typical driveways a substantially clear line of sight should be maintained between the driver of a vehicle waiting on the driveway and the driver of an approaching vehicle. Adequate time should be provided for the waiting vehicle to either cross, turn left, or turn right, without requiring the through traffic to radically alter their speed.

The site would be accessed by vehicles via a driveway located on the cul-de-sac at the eastern terminus of Bransten Road. The cul-de-sac is generally level and has unobstructed sight lines for at least 100 feet in every direction. Further, cul-de-sacs are typically free of obstructions which may hinder sight distances and vehicle operating

speeds within cul-de-sacs are normally relatively slow at 20 mph or slower. Based upon this assessment, it is expected that the sight distance at the project driveways would be adequate if parking is prohibited within the cul-de-sac and adjacent vegetation is properly trimmed.

Finding – Sight lines at the project driveway would be adequate to accommodate all turns into and out of the project site. 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 the proposed project access point. 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 includes reconstruction of the sidewalks adjacent to the project site. 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.

d. *Would the Project result in inadequate emergency access?*

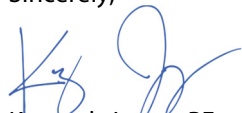
Emergency Access

Emergency response vehicles would be able to access the site via the project driveway on Bransten Road as well as a dedicated emergency-vehicle-only access on Industrial Road approximately 100 feet north of Bransten Road. Since the driveway and internal roadways would be designed and constructed to current City standards to accommodate both passenger and emergency vehicles, as illustrated on the enclosed Fire/Service Truck Access Plan Sheets. Service to the site would also be available via the use of ladder trucks parked on Bransten Road. Since all roadway users must yield the right-of-way to emergency vehicles when deploying 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 emergency vehicles are able to access the site from the public street 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



Mark Spencer, PE
Senior Principal

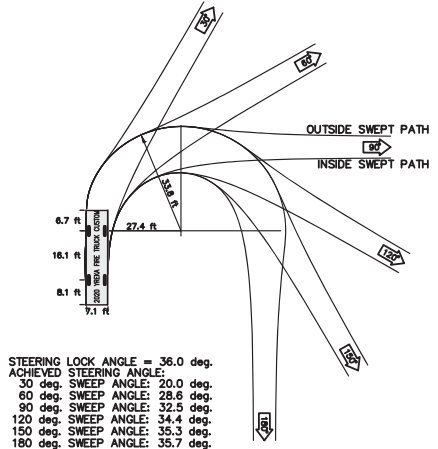
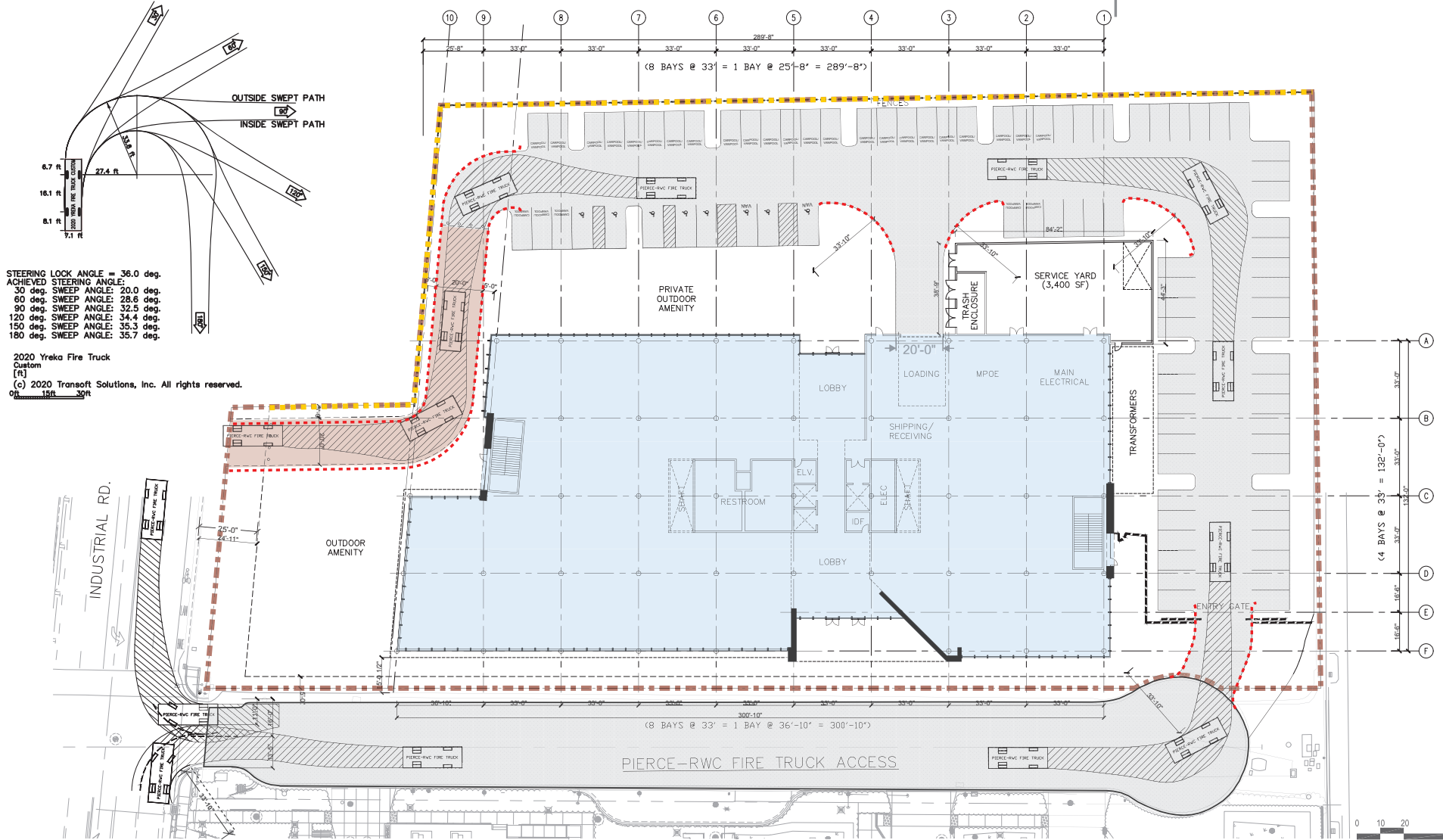


MES/kbj/SCA019-1.L1

Enclosures: VMT Analysis Summary, Fire/Service Truck Access Plan Sheets

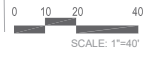
Table 1: VMT Results

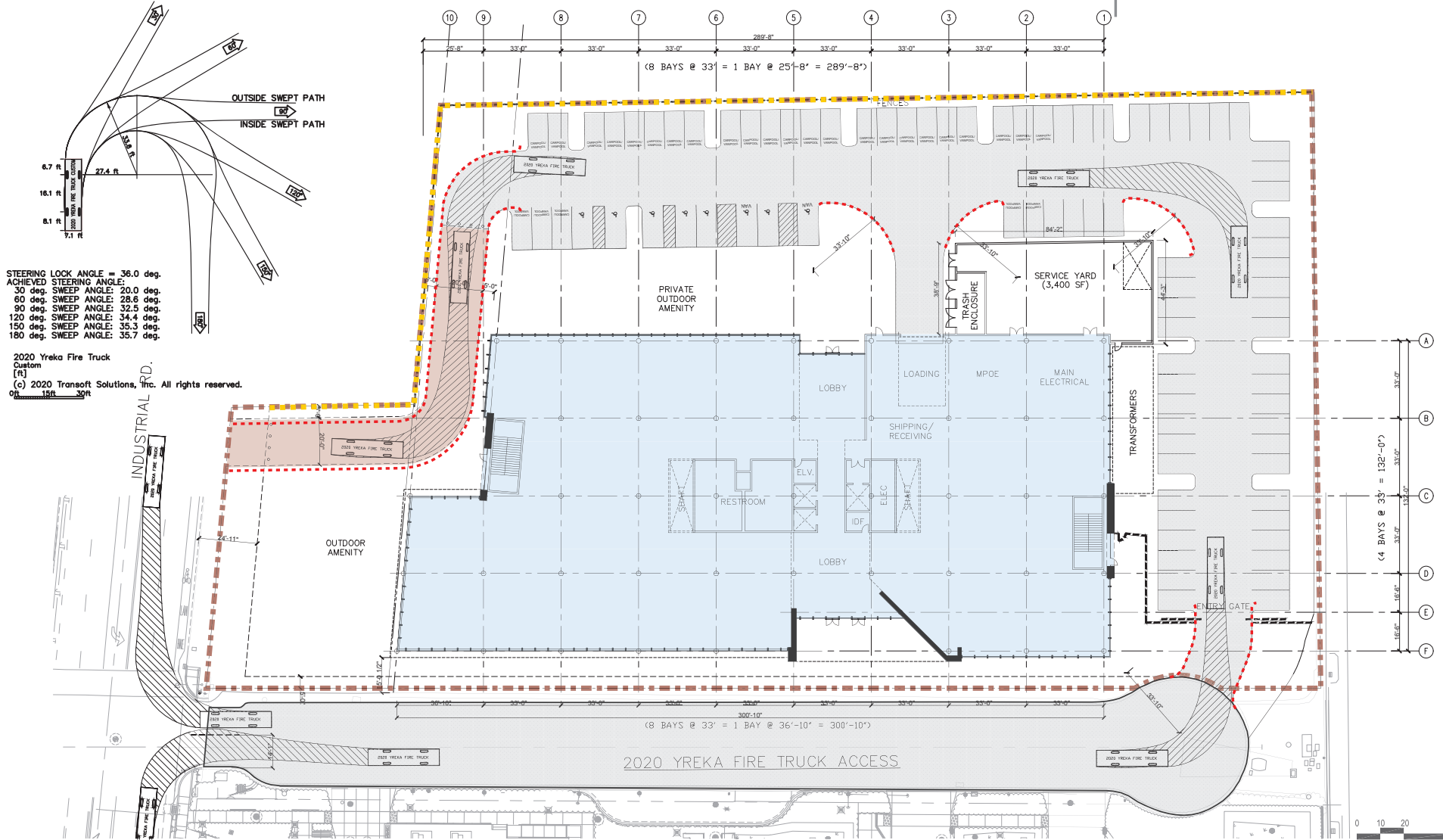
Location	Population	Employment	VMT_HH	VMT_EMP	VMT Per Service	VMT/Service Pop	Mitigated VMT	Mitigated VMT
							(15% below)	Required by TDM Plan
2019 - No-Project & 831 Old County Rd Project								
Old County TAZ 2013	-	-	-	-	-	-	-	-
City	32,432	20,955	511,366	398,674	910,040	17.0		
County	781,121	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 - Project (TAZ 2013)								
Old County TAZ 2013	-	1,085	0	16,544	16,544	15.2	0.8	830
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		



2020 Yreka Fire Truck
 Custom
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 0ft 15ft 30ft

- PROPERTY LINE (888 BRANSTEN)
- PAINTED FIRE LANE (NO PARKING)
- SECONDARY FIRE ACCESS
- (N) SECURITY FENCE





STEERING LOCK ANGLE = 36.0 deg.
 ACHIEVED STEERING ANGLE:
 30 deg. SWEEP ANGLE: 20.0 deg.
 60 deg. SWEEP ANGLE: 28.6 deg.
 90 deg. SWEEP ANGLE: 32.5 deg.
 120 deg. SWEEP ANGLE: 34.4 deg.
 150 deg. SWEEP ANGLE: 35.3 deg.
 180 deg. SWEEP ANGLE: 35.7 deg.

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 0ft 15ft 30ft

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