

## ATTACHMENT C REVIEW OF FINDINGS

### Design Permit:

Per BMC Section 17.42.040 – the following are findings required for issuance of a design permit. The application **would meet** all of the required design permit findings, as described below.

- A. *“The proposal's scale, form and proportion, are harmonious, and the materials and colors used complement the project.”*

The proposal's scale, form and proportion are harmonious. At 21,000 square feet and connecting between two buildings that are planned for 119,470 square feet each, the addition would affectively represent approximately a nine (9) percent increase in floor area relative to the two buildings in which it would be framed. This is on a large campus of approximately 23 acres. So the scale of the addition would be moderate between these two buildings and well in scale with the campus setting.

The addition would be set back from the front and rear edges of the two buildings providing articulation between the buildings. It would also be stepped down from five stories at the penthouse levels to four stories between the two buildings and it would be open at the ground level, with columns provided for structural support, and otherwise landscaped at the ground level. All this will serve to reduce the mass.

The materials and colors will complement the project, in that they will be a match with the glazing and cladding materials approved for these two buildings and the campus buildings as a whole. The exterior materials would be predominately windows that will provide a transparent feel. Tan, earth colored, glass fiber reinforced concrete (GFRC) cladding would be used on the columns and between the second and third floors near the building entrances, to tie into the GFRC cladding that's to be used between the floors on the two buildings.

- B. *“The orientation and location of buildings, structures, open spaces and other features integrate well with each other and maintain a compatible relationship to adjacent development.”*

The 1400 and 1600 Sierra Point Parkway buildings were originally designed to speak to each other, in that they have a symmetrical orientation with an axial relationship if one was to draw a mid-line between the two. The proposed addition would keep that axial relationship and complete the space in-between, tying the two buildings together.

As with the 1400 and 1600 buildings, the abundance of glazing would provide for a sense of openness and transparency.

The elevated addition would result in a slightly narrower visual corridor for views between the two buildings from Sierra Point Parkway to the south of the site. However, because the addition is on the second, third and fourth floors, ground level views to the north and south between the buildings would not be impeded. It would not affect the primary view corridor, which is located to the east, along the north-south alignment at the end of Marina Boulevard.

C. *“Proposed buildings and structures are designed and located to mitigate potential impacts to adjacent land uses.”*

No significant impacts were identified with the proposed addition. The addition would be well set back from the property lines and located between the two entitled buildings of 1400 and 1600 Sierra Point Parkway.

D. *“The project design takes advantage of natural heating and cooling opportunities through building placement, landscaping and building design to the extent practicable, given site constraints, to promote sustainable development and to address long term affordability.”*

Given that the addition is an addition to connect two previously entitled buildings to serve a specific function of connecting them, there are not any viable options for locating the addition elsewhere on the site. Through the incorporation of the same glazing as approved for the rest of the campus buildings, the addition will receive an abundance of daytime sunlight into the space. Additionally, the approximately 1 inch thick glazing is designed to provide insulating qualities consistent with the California Building Code.

E. *“For hillside development, the proposal respects the topography of the site and is designed to minimize its visual impact. Significant public views of San Francisco Bay, the Brisbane Lagoon and San Bruno Mountain State and County Park are preserved.”*

This finding is not applicable, as the site is not on a hillside.

F. *“The site plan minimizes the effects of traffic on abutting streets through careful layout of the site with respect to location, dimensions of vehicular and pedestrian entrances and exit drives, and through the provision of adequate off-street parking. There is an adequate circulation pattern within the boundaries of the development. Parking facilities are adequately surfaced, landscaped and lit.”*

The project would not affect traffic or pedestrian flow since it would be elevated above the ground. No redesign of parking facilities has been contemplated with this proposal.

G. *“The proposal encourages alternatives to travel by automobile where appropriate, through the provision of facilities for pedestrians and bicycles, public transit stops and access to other means of transportation.”*

The proposal includes provisions for pedestrians and bicyclists per the applicable code requirements. It would connect to bikeways and pedestrian pathways onto Sierra Point Parkway

and the Bay Trail and with shuttle services serving the Sierra Point subarea. Additionally, a transportation demand management (TDM) plan was approved as part of the entitlement of the campus. This will be updated prior to building occupancy to reflect changes in the transportation options available. The individual tenant(s) will be required to implement the TDM plan, encouraging alternatives to travel by automobile.

*H. "The site provides open areas and landscaping to complement the buildings and structures. Landscaping is also used to separate and screen service and storage areas, break up expanses of paved area and define areas for usability and privacy. Landscaping is generally water conserving and is appropriate to the location. Attention is given to habitat protection and wildland fire hazard as appropriate."*

The landscaping plan that was previously approved has not be proposed to be reduced with this proposal, since it would be elevated over the landscaping and pedestrian pathways. Modifications are anticipated to the proposed plantings beneath the addition to address shade conditions there, these would be subject to further review by the City for conformance with the previously approved site plan and compliance Water Conservation in landscaping Ordinance, BMC Chapter 15.70.

*I. "The proposal takes reasonable measures to protect against external and internal noise."*

There would be some additional construction noise associated with a longer duration for pile driving for the building supports and then construction noise to complete the space and the construction noise would be subject to the noise mitigation measures required through the EIR. Following construction, there would be no anticipated significant noise effects. This is further discussed in the EIR Addendum.

*J. "Consideration has been given to avoiding off-site glare from lighting and reflective building materials."*

There would be no significant off-site glare from lighting or reflective materials. The materials used would be the same as used with the buildings that are currently under construction.

*K. "Attention is given to the screening of utility structures, mechanical equipment, trash containers and rooftop equipment."*

Screening of utilities associated with this structure is already accounted for with the building at 1600 Sierra Point Parkway, with no additional utilities that would be visible from off-site. No new rooftop equipment is planned for the addition.

*L. "Signage is appropriate in location, scale, type and color, and is effective in enhancing the design concept of the site."*

Signage is not included in this application.

*M. "Provisions have been made to meet the needs of employees for outdoor space."*

The site will include an abundance of outdoor space, including both passive and active recreational opportunities, such as paths through the landscaping, benches, outdoor dining areas, basketball court and a bocce ball court. These landscape features and site amenities would not be affected by this proposal.

### **Parking Use Permit:**

In order to grant a Use Permit to modify the parking regulations, the Planning Commission must make the five use permit findings, as prescribed in BMC §17.40.060 and BMC §17.34.115. The first two findings in §17.40.060 are general in nature and apply to all use permits. The next three conditions, contained in §17.34.115 are more specific to parking.

The application **would meet** all of the required parking use permit findings, as described below.

#### Per BMC §17.40.060,

- 1. In considering an application, the planning commission shall consider and give due regard to the nature and condition of all adjacent uses and structures, and to general and specific plans for the area in question.*

The proposed R&D use is allowed by-right in the zoning district and is consistent with the General Plan. As noted in the analysis, granting of the requested parking modification use permit will not adversely impact adjacent uses, as sufficient parking is being provided on site to serve the proposed use.

- 2. The planning commission shall determine whether or not the establishment, maintenance or operation of the use applied for will, under the circumstances of the particular case, be detrimental to the health, safety, comfort and general welfare of the persons residing or working in the neighborhood of such proposed use, or whether it will be injurious or detrimental to property and improvements in the neighborhood or the general welfare of the city.*

The use applied for is a site-specific parking regulation modification which would not have detrimental or injurious impacts on properties or individuals, since the parking would be contained on site with no changes to the entrances or driveway circulation.

#### Per BMC Section 17.34.050.I,

- 3. Strict enforcement of the specified regulation is not required by either present or anticipated future traffic volume or traffic circulation on the site; and*

Strict enforcement is not required by either present or future anticipated traffic volume, or parking needs. There would be no changes to the parking entrances or internal traffic circulation. While there may be a nominal increase in the number of employees that may occupy the site with the approximately 21,000 square foot building addition, to this previously entitled 540,185 square foot R&D campus, the anticipated number of vehicles would be readily accommodated within the proposed 1,760 surface parking lot and parking garage structure, given that R&D uses have lower parking demand than the administrative office uses and the requested 1 parking space to 321 square feet of office is a nominal increase over the 1 to 300 administrative office standard and well below other R&D uses recently approved in Brisbane.

4. *The granting of the use permit will not create or intensify a shortage of on-street parking spaces, given, for example, the availability of existing or improved on/off-street parking which may not fully meet the requirements of this chapter.*

This finding is not applicable, since there is no on-street parking available in this area and as indicated above, and the R&D parking need would be accommodated entirely on site.

5. *Full compliance with the parking requirements is not reasonably feasible due to existing structural or site constraints.*

Full compliance with the parking standards is not reasonably feasible in that, addition of more parking spaces would result in either the loss of landscaping and potentially site amenities or upward enlargement of the parking garage. Any of these options are not reasonably feasible, given the additional site disruption and losses that would result in order to enforce an administrative office standard that is ill suited to R&D uses.

Installation of additional parking would also be inconsistent with the Sierra Point Design Guidelines which encourages landscape buffers both bayside buildings and at the street edges as well as connective pathways through the different developments.

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## ATTACHMENT D

Draft - RESOLUTION ER-2-19  
A RESOLUTION OF THE PLANNING COMMISSION OF BRISBANE  
CONDITIONALLY APPROVING USE PERMIT UP-2-19,  
MODIFYING PREVIOUSLY APPROVED USE PERMIT UP-12-07  
AT 800 TO 1800 SIERRA POINT PARKWAY  
("HCP SIERRA POINT BIOTECH PROJECT")

WHEREAS, Dawn Jedkins, of DES Architects + Engineers, applied to the City of Brisbane for a use permit, design permit and environmental review to modify the previously approved parking use permit UP-12-07 for the research and development (R&D) campus and to allow for an approximately 21,000 square foot addition at the second, third and fourth floors of the previously entitled building at 1600 Sierra Point Parkway to connect to 1400 Sierra Point Parkway; and

WHEREAS, in 2008 City Council certified the Environmental Impact Report for the 540,185 square foot R&D campus, including a parking garage with a 15,000 square foot retail liner; and

WHEREAS, the City of Brisbane retained Baseline Environmental Consulting to review the environmental impacts of the aforementioned modification to the project and Baseline has prepared an Addendum to the certified EIR for this project, consistent with California Environmental Quality Act (CEQA) Guidelines Section 15164; and

WHEREAS, on June 13<sup>th</sup>, 2019, the Planning Commission conducted a hearing of the application, publicly noticed in compliance with Brisbane Municipal Code Chapters 1.12 and 17.54, at which time any person interested in the matter was given an opportunity to be heard; and

WHEREAS, the Planning Commission reviewed and considered the staff memorandum including the EIR Addendum, and the written and oral evidence presented to the Planning Commission in support of and in opposition to the application; and

NOW THEREFORE, based upon the findings set forth hereinabove, the Planning Commission of the City of Brisbane, at its meeting of June 13<sup>th</sup>, 2019 did resolve as follows:

EIR Addendum ER-2-19, attached herein as Exhibit A, is approved.

ADOPTED this 13<sup>th</sup> day of June, 2019, by the following vote:

AYES:  
NOES:  
ABSENT:

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PAMALA SAYASANE  
Chairperson

ATTEST:

ER-2-19/ UP-2-19/DP-1-19  
800 to 1800 Sierra Point Parkway  
June 13, 2018 Meeting

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JOHN A. SWIECKI, Community Development Director





## MEMORANDUM

**Date:** May 30, 2019 **Job No.:** 19211-00

**To:** John Swiecki, AICP, Director Community Development Brisbane

**From:** Judith Malamut, AICP, Baseline

**Subject:** Addendum to the Sierra Point Biotech Project Final Environmental Impact Report

### INTRODUCTION AND SUMMARY

This memorandum, prepared pursuant to the California Environmental Quality Act (CEQA) and the regulations and policies of the City of Brisbane (City), is an Addendum to the Sierra Point Biotech Project Final Environmental Impact Report (2008 FEIR)<sup>1</sup> which was certified by the City of Brisbane in May 2008. Per CEQA Section 15164, this Addendum evaluates whether modifications and refinements to the Sierra Point Biotech Project (proposed project) would result in new or substantially more adverse significant effects or require new mitigation measures not identified in the 2008 FEIR. HCP is the developer of the project, and the City of Brisbane is the CEQA Lead Agency for this Addendum.

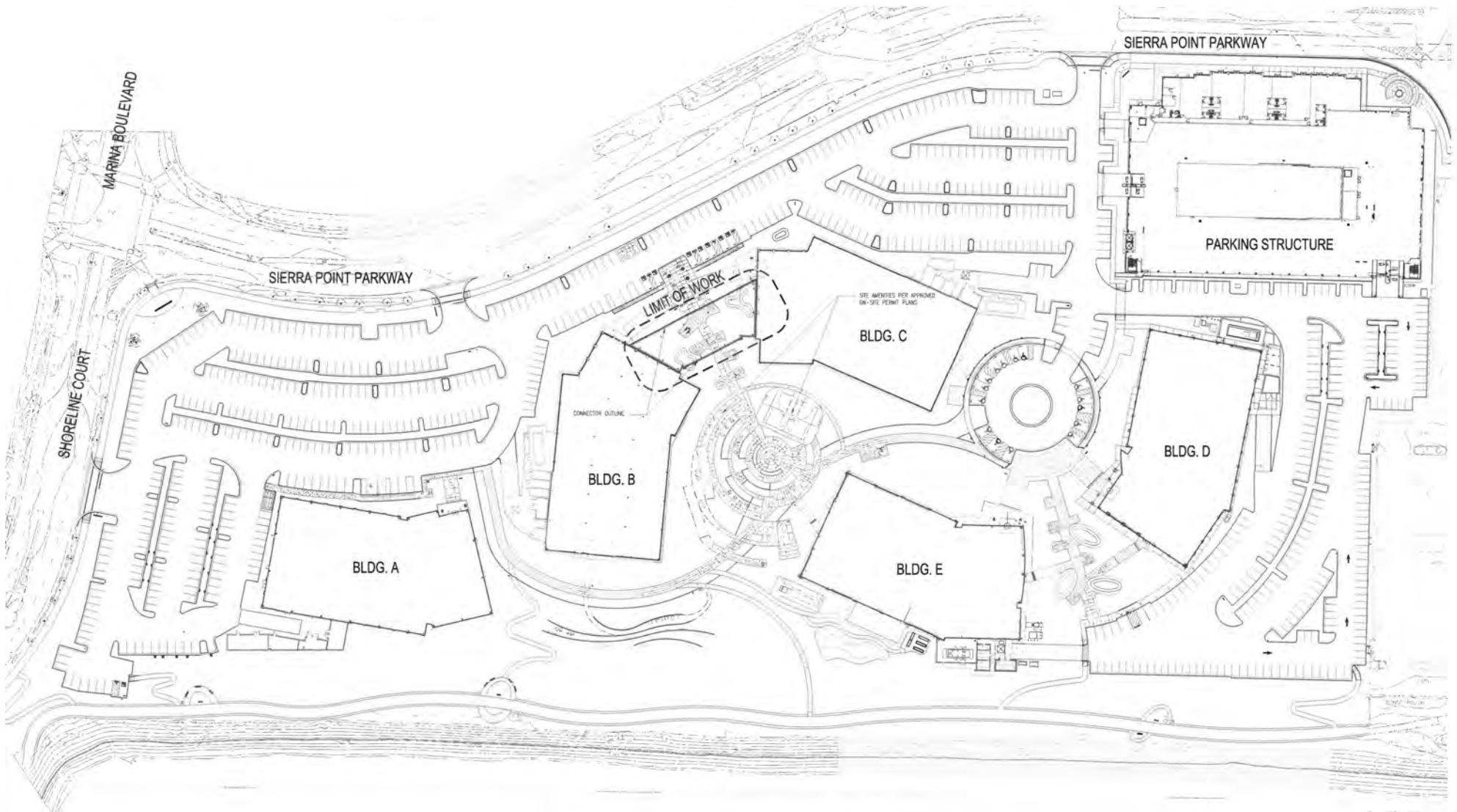
Since certification of the 2008 FEIR, approval of the Development Agreement (DA-1-07)<sup>2</sup> and approval of a Parking Modification Use Permit (UP-12-07)<sup>3</sup> for the project, the applicant is proposing minor changes to the project that would result in a substantially similar use of the project site. The approved and entitled project allowed for development of a life sciences research and development (R&D) facility consisting of approximately 540,185 square feet of office/R&D space in five separate buildings, approximately 15,000 square feet of retail space to be included as part of the parking garage, and 1,801 structured and surface lot parking spaces on approximately 22.8 vacant acres on the Sierra Point peninsula in the City of Brisbane (see Figure 1).

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<sup>1</sup> LSA Associates Inc., 2007. Sierra Point Biotech Project Final Environmental Impact Report. April. Certified May 12, 2008.

<sup>2</sup> City of Brisbane. 2008. Development Agreement Between the City of Brisbane and HCP LS Brisbane, LLC. DA-1-07. June 16.

<sup>3</sup> City of Brisbane. 2008. Resolution 2008-12 Resolution Amending the Sierra Point Combined Site and Architectural Design Guidelines, Conditionally Approving Design Permit DP-6-05 and Parking Modification Use Permit UP-12-07 for the Sierra Point Biotech Project. May 12.



**Figure 1**  
*Sierra Point Biotech Campus Site Plan and Proposed Addition*



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The 2008 FEIR found that significant environmental impacts would result in the following topical areas: Aesthetics/Visual Resources; Transportation, Circulation and Parking; Air Quality, Noise, Geology, Soils, and Seismicity; Hydrology and Water Quality; Biological Resources; Hazards and Hazardous Materials; Public Services and Recreation; and Utilities and Infrastructure. Significant and unavoidable traffic and aesthetic impacts were identified for the project and the City Council adopted Findings and a Statement of Overriding Considerations in 2008 for these impacts.

This Addendum to the final EIR evaluates the minor modifications to the project including: an approximately 21,000 square-foot addition on the second, third and fourth floors (7,000 square feet per floor) to link Buildings B and C; the reduction of 41 parking spaces; an increase in the amount, and modifications to the location of retail/commercial space from 15,000 square feet to approximately 22,300 square feet (an increase of 7,300 square feet). The increase and change in location of retail/commercial space corresponds to the following: the retail liner of the parking garage would be reduced in size in exchange for a café within Building E (1200 Sierra Point Parkway); a fitness center would be located within Building D (1000 Sierra Point Parkway), as an R&D tenant amenity, and there would be a corollary reduction in R&D space from Buildings D and E of approximately 12,600 square feet. These modifications are described more fully in subsection Revisions to the Approved Project, below.

Pursuant to CEQA Guidelines 15164 this Addendum: provides a description of the purpose and CEQA framework; describes the proposed revisions to the project; evaluates the revisions for each environmental topic; and reviews the revised project per the conditions listed in CEQA Guidelines Sections 15162 and 15163.

This Addendum provides substantial evidence to confirm that the proposed revisions to the project do not result in any new or more severe impacts and the mitigation measures included in the 2008 FEIR are adequate for the current project, per CEQA Guidelines Section 15164, and no further CEQA review is required.

### **ADDENDUM PURPOSE AND CEQA FRAMEWORK**

The purpose of this Addendum is to evaluate whether the proposed revisions to the project would result in any new or substantially greater significant effects or require any new mitigation measures not identified in the 2008 FEIR for the approved project. This Addendum will be used by the City when considering approval of the modification to the project. The 2008 FEIR is hereby incorporated by reference.

CEQA Guidelines Section 15164 allows for the preparation of an Addendum to a certified EIR “if some changes or additions are necessary but none of the conditions described in Section 15162

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calling for preparation of a subsequent EIR have occurred.” CEQA Guidelines Section 15162 identifies the following conditions that would require preparation of a subsequent EIR:

- (1) Substantial changes in the project are proposed which require major revisions to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which require major revisions to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time of EIR adoption, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the EIR,
  - (B) The project will result in impacts substantially more severe than those disclosed in the EIR,
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measure or alternative, or
  - (D) Mitigation measures or alternatives that are considerably different from those analyzed in the EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure or alternative.

## REVISIONS TO THE APPROVED PROJECT

The project site would continue to be comprised of three parcels: APN 007-165-130, APN 007-165-140, and APN 007-165-150; 22.8 acres in size, and located to the east of Shore Line Court and south of Sierra Point Parkway (see Figure 1). The approved site uses would substantially continue to be the same. The three proposed modifications to the approved project are described in this section.

### Proposed Buildings B and C Connector

The developer is proposing an addition of approximately 21,000 square feet of space to connect Buildings B and C (1600 and 1400 Sierra Point Parkway, respectively) on the second, third and

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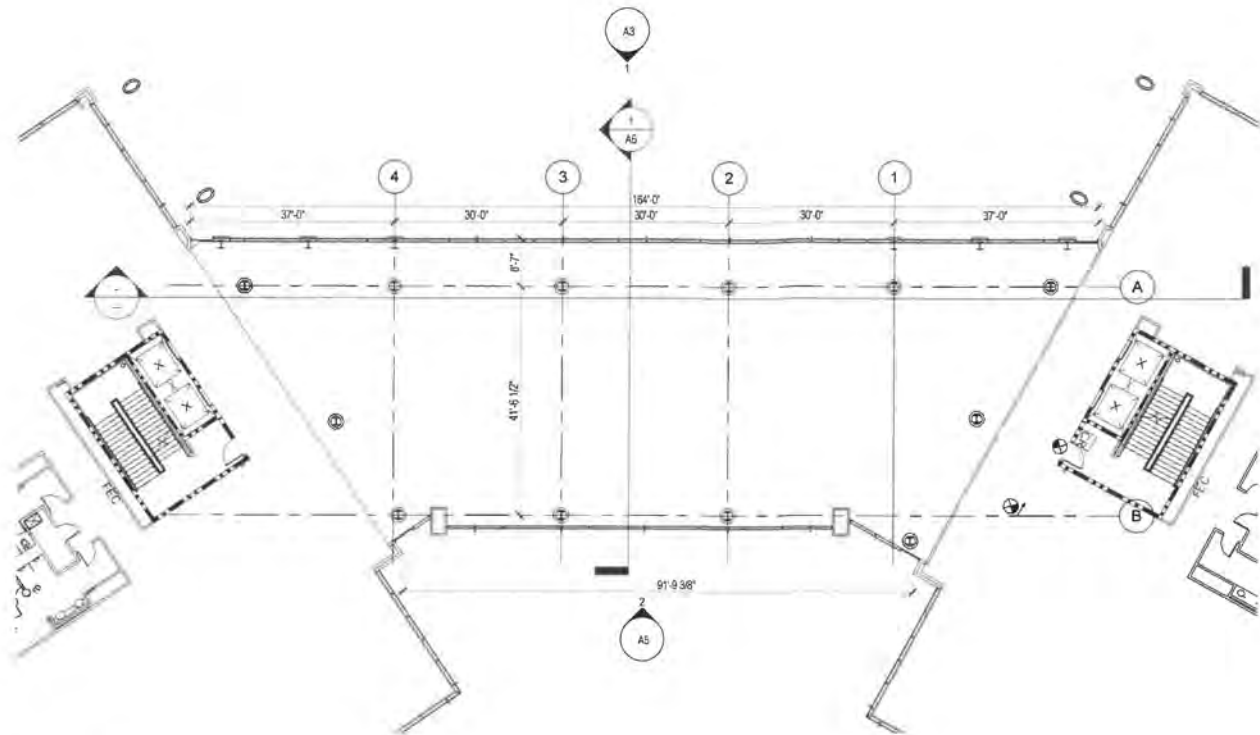
fourth floors (7,000 square feet per floor). The addition would act as a connection between the two buildings to allow for pedestrian movement, R&D and office uses. Figure 1 shows the location of the addition and Figure 2 shows the floor plans. As shown in the northern and southern elevations provided in Figures 3 and 4, the design of the elevated and enclosed addition would match the design of the other campus buildings. Elevating the addition would allow for views and pedestrian movement under the addition, access to the parking areas north of the buildings, and access to pedestrian pathways, the shoreline and Bay Trail south of the buildings. Figures 5 and 6 provide conceptual designs of the north and south facades with and without the proposed addition.

### **Reduction in Parking Spaces**

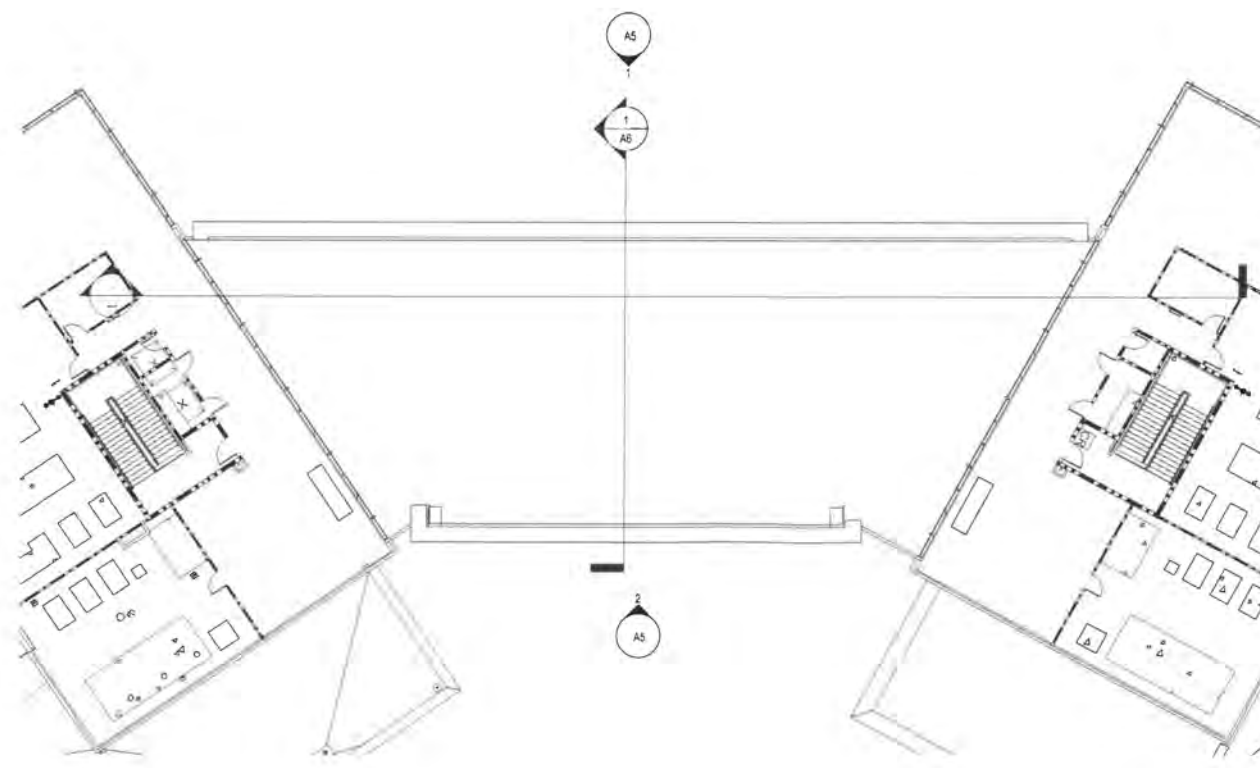
HCP is requesting a reduction of 41 parking spaces, from 1,801 to 1,760 spaces. According to HCP, a number of factors have required this reduction including additional State building code requirements for electric vehicle (EV) stalls and tenant requests. The developer has added EV chargers to parking stalls at the site which has reduced the number of overall parking spaces to make room for the ADA requirements for use of EV charger stalls in addition to the number of required standard ADA stalls. The expansion of some parking spaces requires the reduction of the overall number of parking spaces within surface lots and in the parking structure. The project also includes service yards for delivery trucks and equipment associated with the R&D use. HCP notes that service yards have become more active and have larger equipment requirements which in some cases required the removal of parking spaces on the campus. The developer also wants to accommodate larger delivery trucks which also requires the removal of parking to allow for the appropriate turning movements for the delivery trucks.

### **Changes in Retail and R&D Space**

The developer is proposing revisions to the amount and location of retail space reviewed and approved of in the 2008 FEIR. The approved 15,000 square feet of retail space was to be incorporated into the project as a "liner" to the parking structure in the northeastern portion of the site. The developer is proposing to reduce the amount of retail in this location to approximately 13,000 square feet, and would add a café of approximately 9,300 square feet in Building E (1200 Sierra Point Parkway), which would be open to the public. Additionally, a fitness center of approximately 3,300 square feet would be included in Building D (1000 Sierra Point Parkway), to serve as an amenity to the R&D tenants. The café and fitness center do not represent added floor area, as the amount of entitled square feet of R&D space would be reduced by approximately 12,600 square feet from Buildings D and E.

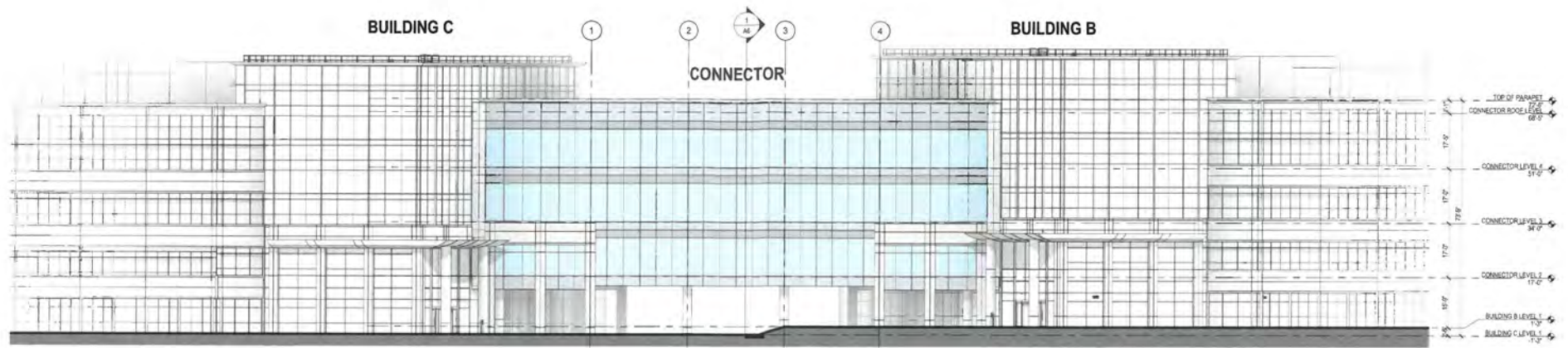


2 LEVEL 2, 3 +4  
1/16" = 1'-0"

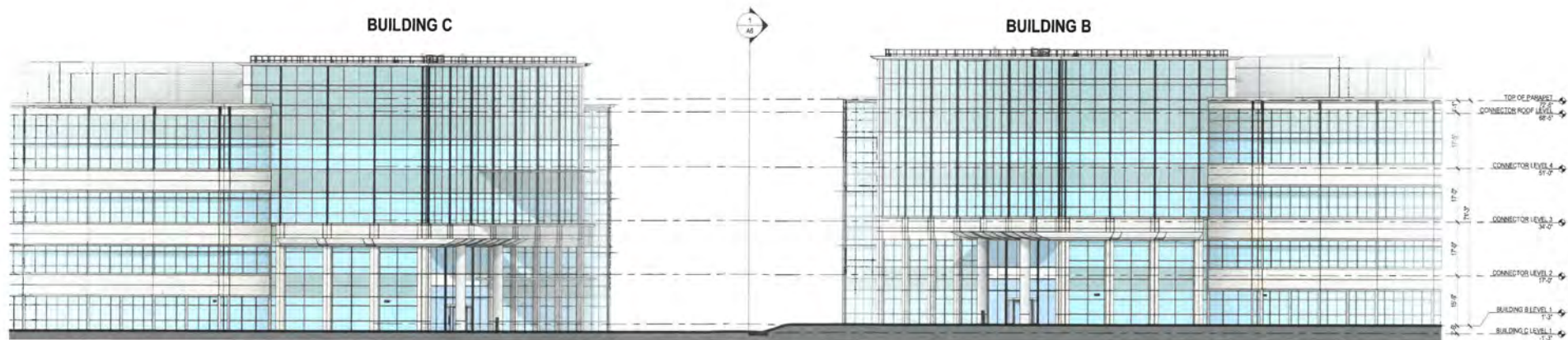


4 ROOF PLAN  
1/16" = 1'-0"

Figure 2  
Proposed Addition Floor Plans

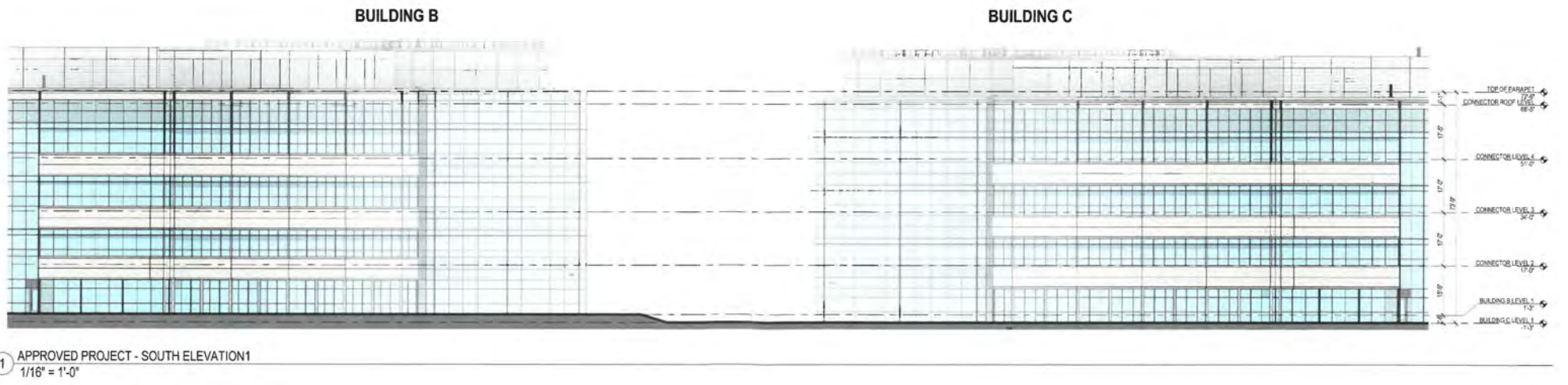
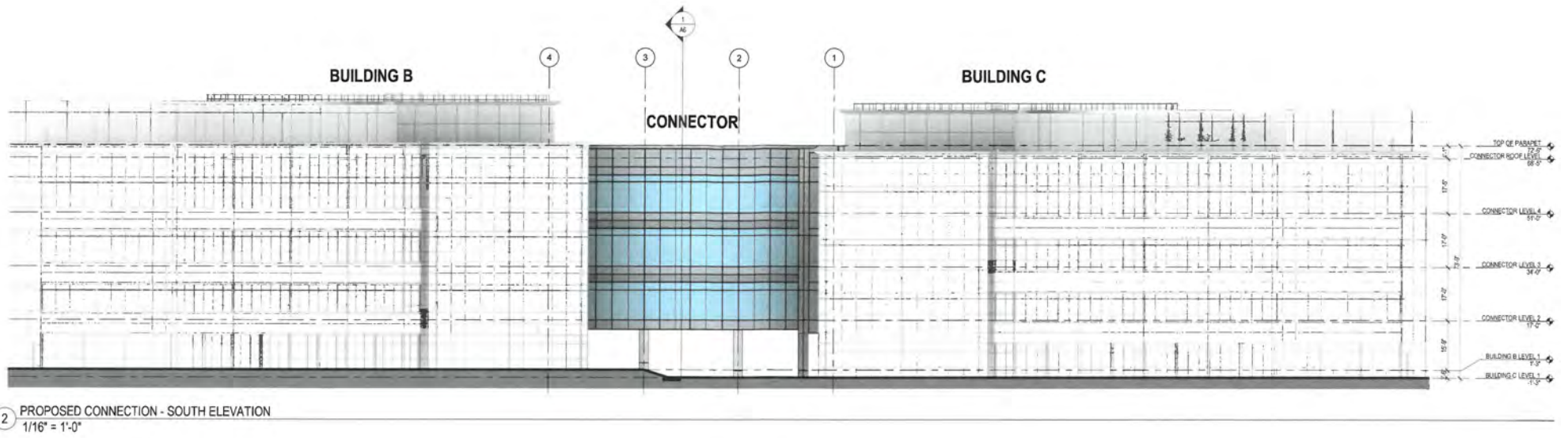


1 PROPOSED CONNECTION - NORTH ELEVATION  
1/16" = 1'-0"



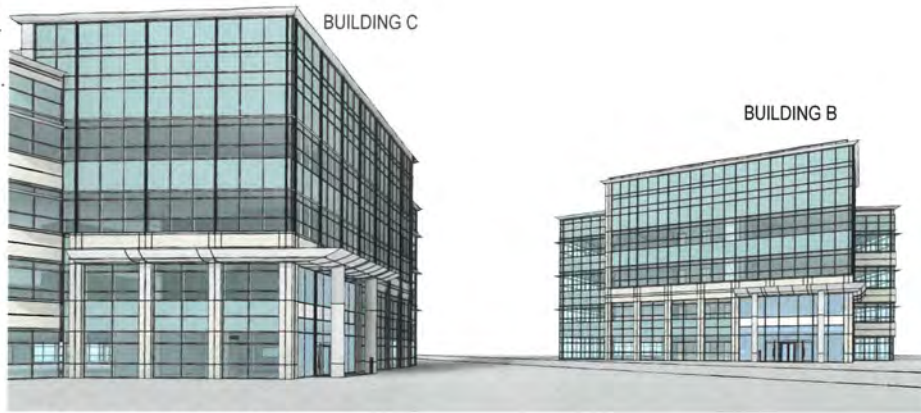
2 APPROVED PROJECT - NORTH ELEVATION1  
1/16" = 1'-0"

**Figure 3**  
*Approved Project and Proposed  
Addition North Elevations*

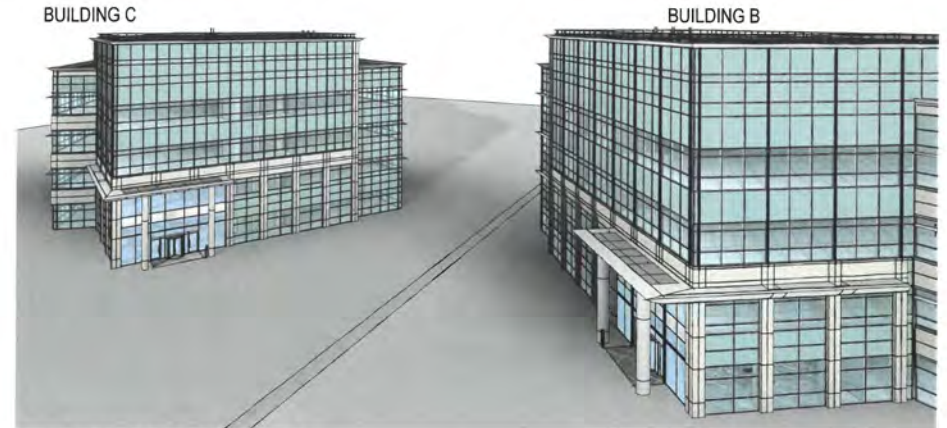


**Figure 4**  
*Approved Project and Proposed Addition South Elevations*





1 VIEW OF APPROVED PROJECT NORTH FACADE

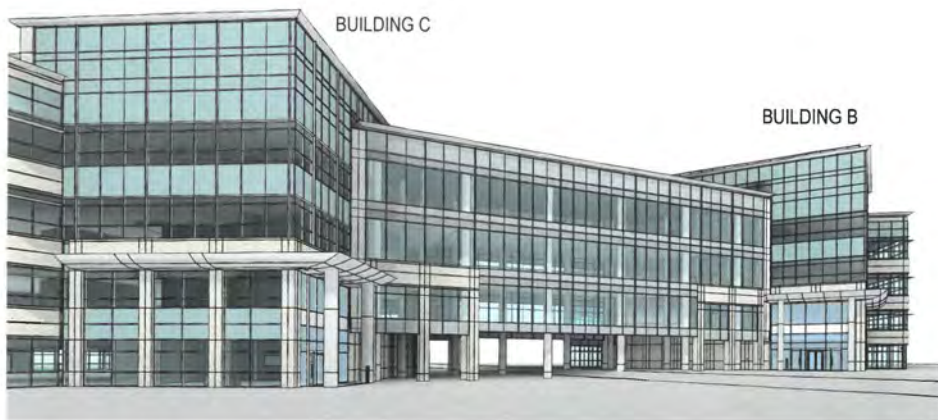


2 VIEW OF APPROVED PROJECT NORTH FACADE

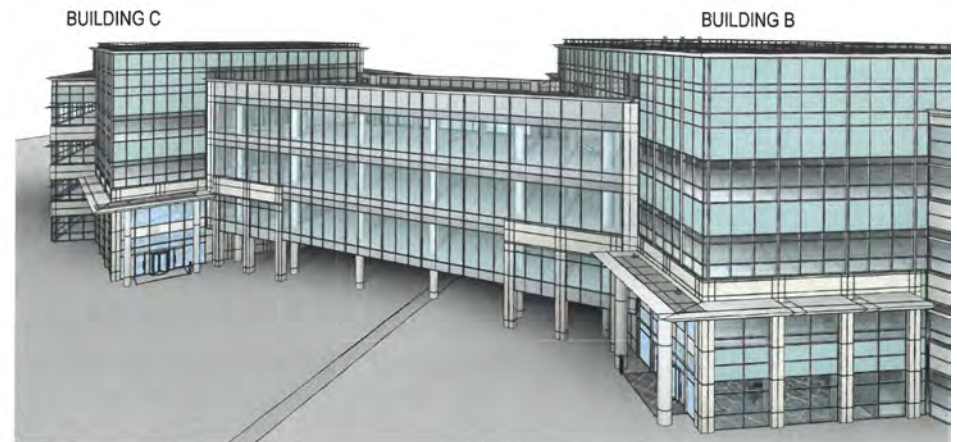


3 VIEW OF APPROVED PROJECT SOUTH FACADE

**Figure 5**  
*Approved Project Conceptual Design  
 North and South Facades*



1 VIEW OF NORTH FACADE



2 VIEW OF NORTH FACADE



3 VIEW OF SOUTH FACADE

Figure 6

*Proposed Addition Conceptual Design  
North and South Facades*

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### **ANALYSIS OF ENVIRONMENTAL EFFECTS**

This section provides an analysis of the environmental effects of the proposed changes to the approved project.

#### **Aesthetics**

The inclusion of the elevated addition connecting Buildings B and C would result in a slightly narrower visual corridor for views between the buildings from Sierra Point Parkway to the south of the site. Because the addition is on the second, third and fourth floors, ground level views to the north and south between the buildings would not be impeded. The addition would not affect the view corridor between Buildings D and E required to be maintained per BCDC Permit No. M08-19 dated November 10, 2008.

The 2008 FEIR identified unavoidable adverse aesthetic impacts associated with the parking garage. In response to this conclusion, the applicant redesigned the garage to reduce the height from 6 to 5 levels, added the retail liner with green roof component to break up the building mass, and provided additional architectural enhancements to the garage elevations to increase design compatibility with the overall project. These modifications reduced the project's aesthetic impacts to a less-than-significant level. The significant visual impact associated with the design of the parking garage would not be affected by the addition of the connector, the reduction of parking spaces or the reduction of retail space at the parking structure. The changes to the project do not raise new or substantially greater environmental impacts to views and vistas than previously disclosed. Mitigation Measure VIS-2 regarding the control of light and glare would be applicable to the additional building space.

#### **Transportation, Circulation and Parking**

Significant unavoidable cumulative transportation impacts were identified pertaining to segments of Hwy 101, which will operate at a degraded level of service with or without the project. Additionally, the 2008 FEIR concluded that the intersection of Sierra Point Parkway and the northbound Sierra Point Parkway offramp will operate at LOS F during the AM peak. Further analysis by the 2008 FEIR traffic consultant revealed that restriping of the current northbound offramp to allow right turns from both existing lanes would improve the LOS of this intersection from "F" to "C" under cumulative buildout conditions. However, because this improvement is under the jurisdiction of Caltrans and not within the City's control, this impact was also identified as being significant and unavoidable to reflect a worst case scenario.

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Fehr & Peers, traffic consultants, conducted a review of the proposed revisions to the project (included in Attachment A).<sup>4</sup> The results of the analysis indicated that the addition of 21,000 square feet (conservatively assumed to be used as R&D space) to the project's total square footage was less than what was environmentally cleared by the 2008 FEIR. Additionally, the revised project is also expected to generate fewer vehicle trips during the AM and PM peak hours compared to what was analyzed in the 2008 FEIR. Since the peak hour trip generation of the revised project falls within the envelope of what was previously analyzed and approved, the impacts are expected to be similar to those presented in the EIR and the mitigation measures identified in the EIR would continue to be appropriate for the revised project.

The proposed reduction of parking spaces from 1,801 to 1,760 spaces would not create new or substantially greater environmental impacts as the requirement for the implementation of Travel Demand Management (TDM) measures would still be required per Mitigation Measure TRANS-8 to reduce vehicular trips.

The increase in retail space and the subsequent reduction in R&D space also would not cause new or greater transportation or circulation impacts.

## Land Use

The 2008 FEIR concluded that the project would not have the potential to cause significant impacts related to land use and planning. The proposed new building space, reduction in parking and modifications of the retail space would not result in new significant impacts related to land use and planning. The uses proposed for the additional space are consistent with the approved land uses for the project.

## Population Employment and Housing

The 2008 FEIR concluded that the project would not have the potential to cause significant impacts pertaining to population, employment or housing, and estimated that development of the project would result in approximately 1,800 employees. Development of the proposed 21,000 square-foot addition between Buildings B and C would result in a minor increase in the number of employees. However, the majority of the additional space would be used for a connecting corridor between the buildings. The addition of employees, retail space and reduction in parking spaces would not result in new significant impacts related to population, employment and housing.

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<sup>4</sup> Fehr & Peers, 2019. Memorandum: Sierra Point Trip Generation Comparison. April 23.

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### **Air Quality**

The 2008 FEIR calculated that operations associated with the project would result in 62.9 to 68.3 pounds per day of criteria pollutant emissions. Compared to the significance threshold of 80 pounds per day, this amount of emissions were found to be less than significant. Assuming the 21,000 square foot addition would generate operational emissions proportional to the project's emissions associated with the approved land uses, the increment of new operational emissions would be approximately 2.5 pounds per day, and would not result in an exceedance of the thresholds when added to approved project emissions. The 2008 FEIR concluded that the approved project would have the potential to cause significant construction related air quality impacts and recommended mitigation measures to reduce impacts to a less-than-significant level. Construction of the proposed addition between Buildings B and C would result in a minor increase in construction emissions, but these emissions would not be substantially greater than those analyzed in the 2008 FEIR. Mitigation Measure AIR-1 of the 2008 FEIR, which requires implementation of best management practices to control construction-period dust and emissions, and would apply equally to the construction of the additional space. The proposed parking reduction and changes to retail space would not create new impacts or substantially contribute to significant air quality impacts.

### **Noise**

The 2008 FEIR concluded that the approved project would have the potential for significant noise impacts related to construction and aircraft noise, and recommended mitigation measures to reduce impacts to a less-than-significant level. Construction of the proposed addition between Buildings B and C would result in a minor increase in the duration of construction noise but would not result in substantially more construction noise than analyzed in the 2008 FEIR. Mitigation Measure NOISE-1 requiring mechanical ventilation (such as air conditioning systems) to be included in the design for Building B and Building C in order to meet the California Land Use Compatibility Guidelines would be applicable to the new space. Mitigation Measure NOISE-2 providing construction-related noise controls would also remain applicable to the construction of the addition. The proposed parking reduction and changes to retail space would not create new impacts or substantially contribute to significant construction or operational noise impacts.

### **Geology, Soils, and Seismicity**

The 2008 FEIR concluded that the approved project would have the potential to cause significant impacts related to geology, soils, and seismicity and recommended mitigation measures to reduce impacts to a less-than-significant level. Development of the proposed addition between Buildings B and C, reduction in parking and the revisions to retail space would

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not substantially increase the potential for geologic hazards and associated risks to humans and structures. There is nothing unusual or unique about the proposed project modifications that would result in new or more significant geology-related effects. Federal, State and local regulations, best management practices and Mitigation Measures GEO-1, GEO-2, GEO-3 and GEO-4 regarding detailed geotechnical investigations, building code requirements and inspections would continue to apply to the proposed modifications to ensure that significant impacts related to geology, soils and seismicity would be reduced to a less-than-significant level.

### **Hydrology and Water Quality**

The 2008 FEIR concluded that construction of the project would have the potential to cause significant impacts related to water quality, and recommended mitigation measures to reduce impacts to a less-than-significant level. Construction of the addition between Buildings B and C could result in a minor increase in the potential for construction-related water quality degradation. Because the addition would be elevated above the ground, hydrology and drainage effects would be limited. The potential effect would not be a new or substantially more severe impact than those already addressed in the 2008 FEIR. Federal, State and local regulations, best management practices and Mitigation Measures HYDRO-1 and HYDRO-2 requiring preparation of a Stormwater Pollution Prevention Plan (SWPPP) and an erosion control plan would continue to apply to the proposed project revisions to ensure that significant impacts related to hydrology and water quality would be reduced to a less-than-significant level.

### **Biological Resources**

The 2008 FEIR concluded that the project's grading and construction would have the potential to cause significant impacts related to biological resources and recommended mitigation measures to reduce impacts to a less-than-significant level. The proposed project modifications would not result in increased grading and only a minor increase in construction activity than was analyzed in the 2008 FEIR. Mitigation Measures BIO-1, BIO-2, BIO-3 and BIO-4 requiring pre-construction surveys for burrowing owls, protection of water quality during grading, and tree removal requirements would equally apply to the proposed modifications to ensure that significant impacts related to biological resources would be reduced to a less-than-significant level.

### **Hazards and Hazardous Materials**

The 2008 FEIR concluded that the approved project would have the potential to cause significant impacts related to hazards and hazardous materials, and recommended mitigation measures to reduce impacts to a less-than-significant level. Development of additional R&D

## **Memorandum**

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space between Buildings B and C would result in a minor increase in the use, storage or disposal of hazardous materials, but such use would not be substantially more than was analyzed and mitigated in the 2008 FEIR. Federal, State and local regulations, best management practices and Mitigation Measures HAZ-1, HAZ-2 and HAZ-3 requiring establishment of emergency preparedness procedures, a SWPPP, Title 27 compliance for landfill coverage integrity and standards for lab animal care would equally apply to the proposed modifications to ensure that significant impacts related to hazardous materials would be reduced to a less-than-significant level.

### **Public Services and Recreation**

The 2008 FEIR concluded that the approved project would not cause significant impacts related to the provision of public services and recreation. As noted in the 2008 FEIR, the project is located on a site already provided with public services consistent with growth assumptions, and no facility improvements are required to accommodate future demand. Development of the additional space between Buildings B and C would result in a minor increase in the number of employees, but not to a degree that would affect the demand for public services and recreation. Similarly, proposed modifications to parking and retail space would not affect the need for public services as evaluated in the 2008 FEIR.

### **Utilities and Infrastructure**

The 2008 FEIR concluded that the project would have the potential to cause significant impacts related to utilities and infrastructure, and recommended mitigation measures to reduce impacts to a less-than-significant level. Development of the addition between Buildings B and C would result in a minor increase in the number of employees in the area with a related minor increase in demand for utilities, however the increased demands would not be substantially more than analyzed in the 2008 FEIR. Mitigation Measures UTL-1 through UTL-7 would fully apply to the additional space such that significant impacts would be reduced to a less-than-significant level. Proposed modifications to parking and retail space would not affect the need for utilities evaluated in the 2008 FEIR.

### **COMPARISON TO THE CONDITIONS LISTED IN CEQA GUIDELINES SECTIONS 15162 AND 15163**

The following discussion summarizes the reasons that a Subsequent EIR, pursuant to CEQA Guidelines Sections 15162 and 15163, is not required to evaluate the environmental effects of the proposed minor modifications to the project.

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### **Substantial Changes to the Project**

The proposed design and construction of the additional 21,000 square feet of space, the reduction of parking, and the addition of more retail space and reduction of R&D space would not substantially change the uses allowed on the site, site coverage, total hardscape area, AM and PM peak hour trips to and from the site, aesthetic resources at the site, utility and infrastructure improvements, excavation of soil and off-haul amounts and effects to biological resources that were analyzed in the Final EIR as amended and approved by the City. The proposed minor modifications are not substantial changes to the project. These minor modifications would not result in new significant environmental impacts beyond those identified in the Final EIR, would not substantially increase the severity of impacts identified in the Final EIR, and would not require major revisions to the Final EIR. Therefore, the proposed changes to the project would be minor refinements to design of the buildings and provision of parking spaces and not substantial changes. An Addendum is the appropriate document to address these minor modifications rather than a Subsequent EIR or a Supplement to the Final EIR.

### **Substantial Changes in Circumstances**

Construction of Phase 1 of the project (Buildings D and E) is underway. Environmental conditions in and around the project site have not changed such that implementation of the proposed minor design modifications to the project would result in new significant environmental effects or a substantial increase in the severity of environmental effects identified in the Final EIR, and thus major revisions to the Final EIR are not required.

### **New Information**

No new information of substantial importance, which was not known and could not have been known when the Final EIR was certified, has been identified to show that the proposed minor modifications to the project would be expected to result in: 1) new significant environmental effects not identified in the Final EIR; 2) substantially more severe environmental effects than shown in the Final EIR; 3) mitigation measures or alternatives previously determined to be infeasible that would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project sponsor declines to adopt the mitigation measure or alternative; or 4) mitigation measures or alternatives which are considerably different from those identified in the Final EIR would substantially reduce one or more significant effects of the project but the project sponsor declines to adopt the mitigation measure or alternative. In addition, the proposed minor modifications to the project would require no new mitigation measures because no new or substantially more severe impacts are expected beyond those identified in the Final EIR.



## **Memorandum**

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Existing regulations including but not limited to: City of Brisbane General Plan policies, Zoning Ordinance Regulations, Development Agreement DA-1-07, Design Permit DP-6-05, Sierra Point Combined Site and Architectural Design Guidelines and 2008 FEIR mitigation measures adopted and made conditions of project approval would continue to apply to the modified project.

## **CONCLUSION**

The proposed design and construction of the additional 21,000 square feet of space, the reduction of parking spaces, and addition of more retail space and reduction of R&D space described in this Addendum would not require major revisions to the Final EIR due to new or substantially increased significant environmental effects. There have been no substantial changes with respect to the circumstances under which these minor modifications would be undertaken that would require major revisions of the Final EIR due to new or substantially increased significant environmental effects, and there has been no discovery of new information of substantial importance that would trigger or require major revisions to the Final EIR due to new or substantially increased significant environmental effects. Therefore, no subsequent or supplemental EIR is required prior to approval of the designs for the additional 21,000 square feet of space, the reduction of parking, and the addition of more retail space and reduction of R&D space, as described in this Addendum.

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## ATTACHMENT E

Draft - RESOLUTION UP-2-19  
A RESOLUTION OF THE PLANNING COMMISSION OF BRISBANE  
CONDITIONALLY APPROVING USE PERMIT UP-2-19,  
MODIFYING PREVIOUSLY APPROVED USE PERMIT UP-12-07  
AT 800 TO 1800 SIERRA POINT PARKWAY  
("HCP SIERRA POINT BIOTECH PROJECT")

WHEREAS, Dawn Jedkins, of DES Architects + Engineers, applied to the City of Brisbane for a use permit, per Brisbane Municipal Code Section 17.34.050.I, to modify the previously approved parking use permit UP-12-07, in order to allow for modification to the research and development (R&D) parking space requirements; and

WHEREAS, the site-wide parking is proposed to be reduced to 1,760 parking spaces whereas 1,801 spaces were previously approved for this development, including 10 spaces designated for Bay Trail users; and

WHEREAS, the City's current parking requirement for R&D use is the same as administrative offices, a minimum of 1 parking space to 300 square feet of building floor area, per BMC Section 17.34.020, and

WHEREAS, factoring out the Bay Trail parking, this approval would allow for either 1 space to 309 square feet of R&D floor area, or if, via separate resolution, a design permit is approved for a 21,000 square foot building addition to 1600 Sierra Point Parkway, this approval would allow for 1 space to 321 square feet of R&D floor area; and

WHEREAS, on June 13<sup>th</sup>, 2019, the Planning Commission conducted a hearing of the application, publicly noticed in compliance with Brisbane Municipal Code Chapters 1.12 and 17.54, at which time any person interested in the matter was given an opportunity to be heard; and

WHEREAS, the Planning Commission reviewed and considered the staff memorandum relating to said application, and the written and oral evidence presented to the Planning Commission in support of and in opposition to the application; and

WHEREAS, The request is allowed through the an addendum to the previously certified Environmental Impact Report (EIR), per California Environmental Quality Act (CEQA) Guidelines Section 15164, adopted separately on June 13, 2019, via Resolution ER-2-19; and

WHEREAS, the Planning Commission of the City of Brisbane hereby makes the findings attached herein, as Exhibit A, in connection with the requested use permit;

NOW THEREFORE, based upon the findings set forth hereinabove, the Planning Commission of the City of Brisbane, at its meeting of June 13<sup>th</sup>, 2019 did resolve as follows:

ER-2-19/ UP-2-19/DP-1-19  
800 to 1800 Sierra Point Parkway  
June 13, 2018 Meeting

Use Permit UP-2-19, modifying previously approved Use Permit UP-12-07, is approved per the findings and conditions of approval attached herein as Exhibit A.

ADOPTED this 13<sup>th</sup> day of June, 2019, by the following vote:

AYES:  
NOES:  
ABSENT:

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PAMALA SAYASANE  
Chairperson

ATTEST:

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JOHN A. SWIECKI, Community Development Director

## DRAFT - EXHIBIT A

**Action Taken:** Conditional approval of Use Permit UP-2-19, per the staff memorandum with attachments, via adoption of Resolution UP-2-19.

### **Findings:**

- A. In considering an application, the planning commission has considered and given due regard to the nature and condition of all adjacent uses and structures, and to general plan consistency. There is no specific plan applicable to the area in question.
- B. The planning commission has determined that the establishment, maintenance or operation of the use applied for will not, under the circumstances of the particular case, be detrimental to the health, safety, comfort and general welfare of the persons residing or working in the neighborhood of such proposed use, nor will it be injurious or detrimental to property and improvements in the neighborhood or the general welfare of the city.
- C. Strict enforcement of the specified regulation is not required by either present or anticipated future traffic volume or traffic circulation on the site.
- D. The granting of the use permit will not create or intensify a shortage of on-street parking spaces.
- E. Full compliance with the parking requirements is not reasonably feasible due to existing structural or site constraints.

### **Conditions of Approval:**

- 1. The applicant shall obtain building permits for the garage and site work for the required parking spaces, subject to the applicable California Building Code requirements (i.e. ADA space, EV spaces, carpool, etc.)
- 2. This approval allows for either 1 space to 309 square feet of R&D floor area, or if the proposed 21,000 square foot building addition to 1600 Sierra Point Parkway is approved, a ratio of 1 space to 321 square feet of R&D floor area is allowed. In either case, that's a minimum of 1,760 parking spaces site-wide.
- 3. In accordance with the City's parking ordinance, BMC Section 17.34.040.C, no more than 50 percent of the total required spaces may be compact.
- 4. Consistent with the approved TDM plan, building tenants shall implement the transportation demand measures (TDM) on an ongoing basis.
- 5. All other conditions imposed through the entitlement permits, not specifically modified by this permit, shall remain effective.
- 6. Minor modifications may be approved by the Planning Director in conformance with all requirements of the Municipal Code.

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## ATTACHMENT F

Draft - RESOLUTION DP-1-19  
A RESOLUTION OF THE PLANNING COMMISSION OF BRISBANE  
CONDITIONALLY APPROVING DESIGN PERMIT DP-1-19,  
MODIFYING PREVIOUSLY APPROVED DESIGN PERMIT DP-6-05  
AT 800 TO 1800 SIERRA POINT PARKWAY  
("HCP SIERRA POINT BIOTECH PROJECT")

WHEREAS, Dawn Jedkins, of DES Architects + Engineers, applied to the City of Brisbane for a design permit, per Brisbane Municipal Code Section 17.34.050.I, to modify the previously approved design permit DP-6-05, for the HCP Sierra Point Biotech Project, in order to allow for an approximately 21,000 square foot addition to the previously entitled building at 1600 Sierra Point Parkway, connecting to the 1400 Sierra Point Parkway building; and

WHEREAS, in conjunction with this design permit application, DES applied for a parking use permit UP-2-19, which was approved by the Planning Commission on June 13<sup>th</sup>, 2019, and allowed for modification to the parking standards to 1 space to 321 square feet of R&D building floor area; and

WHEREAS, on June 13<sup>th</sup>, 2019, the Planning Commission conducted a hearing of the application, publicly noticed in compliance with Brisbane Municipal Code Chapters 1.12 and 17.54, at which time any person interested in the matter was given an opportunity to be heard; and

WHEREAS, the Planning Commission reviewed and considered the staff memorandum relating to said application, and the written and oral evidence presented to the Planning Commission in support of and in opposition to the application; and

WHEREAS, The request is allowed through the an addendum to the previously certified Environmental Impact Report (EIR), per California Environmental Quality Act (CEQA) Guidelines Section 15164, adopted separately via Resolution ER-2-19; and

WHEREAS, the Planning Commission of the City of Brisbane hereby makes the findings attached herein, as Exhibit A, in connection with the requested use permit;

NOW THEREFORE, based upon the findings set forth hereinabove, the Planning Commission of the City of Brisbane, at its meeting of June 13<sup>th</sup>, 2019 did resolve as follows:

Design Permit DP-1-19, modifying previously approved Design Permit DP-6-05, is approved per the findings and conditions of approval attached herein as Exhibit A.

ER-3-05-A/DP-6-05-R/UP-12-07-R  
800 to 1800 Sierra Point Parkway  
June 13, 2018 Meeting

ADOPTED this 13<sup>th</sup> day of June, 2019, by the following vote:

AYES:

NOES:

ABSENT:

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PAMALA SAYASANE  
Chairperson

ATTEST:

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JOHN A. SWIECKI, Community Development Director



## DRAFT - EXHIBIT A

**Action Taken:** Conditional approval of Use Permit DP-1-19, per the staff memorandum with attachments, via adoption of Resolution DP-1-19.

### **Findings:**

- A. The proposal's scale, form and proportion, are harmonious, and the materials and colors used complement the project.
- B. The orientation and location of buildings, structures, open spaces and other features integrate well with each other and maintain a compatible relationship to adjacent development.
- C. Proposed building is designed and located to mitigate potential impacts to adjacent land uses.
- D. The project design takes advantage of natural heating and cooling opportunities through building placement, landscaping and building design to the extent practicable, given site constraints, to promote sustainable development and to address long term affordability.
- E. The proposal is not for a hillside development.
- F. The proposal would not significantly change the entitled site plan, in that the addition would be elevated above the ground level and pedestrian pathways, parking layout and building entrances would not be altered with this proposal.
- G. The proposal would not alter the entitled project's encouragement of alternatives to travel by automobile where appropriate, through the provision of facilities for pedestrians and bicycles, public transit stops and access to other means of transportation.
- H. The previously entitled site plan provides for open areas and water conserving landscaping to complement the buildings and structures and to provide screening and break up expanses of parking. This proposal would not significantly alter that approved landscaping.
- I. The proposal takes reasonable measures to protect against external and internal noise.
- J. Consideration has been given to avoiding off-site glare from lighting and reflective building materials.
- K. Attention is given to the screening of utility structures, mechanical equipment, trash containers and rooftop equipment, in that these items are already addressed through the previously entitled building at 1600 Sierra Point Parkway.

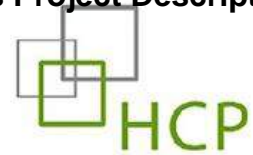
L. There is no signage proposed with this application.

M. Provisions have been made to meet the needs of employees for outdoor space.

**Conditions of Approval:**

1. The applicant shall obtain a building permit for construction of the addition and comply with all applicable state and local codes. This shall include, but is not limited to:
  - a. Compliance with California Title 27 provisions pertaining to post-closure landfill requirements.
  - b. Compliance with the State's Regional Stormwater NPDES Permit requirements for new development.
2. Building materials shall match with the City approved materials for the 1400 and 1600 Sierra Point Parkway buildings.
3. Surface treatment of the support columns/structural members beneath the addition shall be submitted to, and approved by the Planning Director.
4. Any changes to the landscape plan shall maintain planting areas and pedestrian pathways beneath the addition and are subject to Planning Director approval.
5. Prior to building permit issuance the applicant shall pay \$1.5M to the City of Brisbane to be applied toward the design and construction of a public park at Sierra Point.
6. Minor modifications may be approved by the Planning Director in conformance with all requirements of the Municipal Code.
7. This design permit shall become effective fifteen (15) days following approval by the Planning Commission, unless appealed to City Council, pursuant to BMC Chapter 17.52
8. This design permit shall have an expiration date of two (2) years following the effective date of the permit, unless the building permit has been issued and construction commenced, pursuant to BMC 17.42.060.

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**MEMORANDUM**

VIA: Email  
DATE: May 1<sup>st</sup>, 2019  
TO: Ken Johnson, City of Brisbane  
FROM: Scott Bohn, HCP LS Brisbane LLC

**Re: The Shore – B/C Connector Planning Submittal**

Dear Mr. Johnson:

Thank you for meeting with HCP, Inc. to discuss our proposed bridge connector between Buildings B and C at The Shore located on 23 acres of land east of Shoreline Court and south of Sierra Point Parkway (formerly, the “Sierra Point Project”) in the City of Brisbane. As we discussed at our meeting in April 2019, we are submitting our Design Permit Addendum Review and Use Permit applications to initiate the Planning Department’s review of The Shore Bridge Connector Project. The following is intended to address any relevance to Environmental and CEQA review of the application.

**Project Description**

The Project site is located just east of Shoreline Court on Sierra Point Parkway in Brisbane, California. The Project site is currently vacant. In 2008, HCP, Inc. obtained approvals for an amendment to the Sierra Point Commercial/ Retail/Office (SP-C/R/O) General Plan designation for the Property (GP-2-05), an amendment to the zoning regulations for the Sierra Point Commercial (SP-CRO) District to allow R&D uses (RZ-2-05), including limited animal testing, and amendment to the Sierra Point Design Guidelines along with issuance of a design permit for the Project (DP-6-05). HCP also obtained approval of the Sierra Point Development Agreement (DA-1-07), and a parking modification use permit (UP-12-07). Currently, HCP is constructing Buildings D and E in Phase I of The Shore. Building A would be constructed as part of a future Phase 3.

Vehicular access to the site would be provided via Roebbling Road and East Grand Avenue. The TIS prepared in 2006 analyzed a Project that included up to 630,000 square feet (SF) of research and development (R&D) and 2,500 SF of retail. Under the Development Agreement (DA), the Project was entitled for 540,185 SF of R&D and 15,000 SF of retail.

The Shore would include a new approximately 21,000 SF connector bridge between two approved buildings in Phase 2, for a total campus of 561,000 SF of R&D plus 15,000 SF of retail. The bridge would likely include less intensive R&D uses than the rest of the building area. The proposed Bridge Connector between Buildings B and C would be constructed as part of Phase 2 of The Shore Project. The Bridge Connector would consist of 21,000 square feet and would connect two new buildings that would be constructed in Phase 2 of the 540,185 square foot campus. The proposed Bridge Connector is consistent with the existing Sierra Point Commercial/Retail/Office (SP-C/R/O) General Plan designation, the applicable zoning district (SP-CRO) and with the Combined Site and Architectural Design Guidelines that serve as the master plan for development of Sierra Point (“Sierra Point Design Guidelines”). HCP is requesting approval of an amendment to the Design Review Permit in order to allow the construction of the 21,000 square foot Bridge Connector between the office buildings. The 21,000 square foot elevated and enclosed bridge would allow for employees and visitors to walk between buildings.

## **Development Agreement**

The proposed Bridge Connector Project is consistent with the prior project approvals that were vested under the Development Agreement. The City Attorney has confirmed that no amendment to the Development Agreement would be required for the construction of the Bridge Connector. Under the Development Agreement, the approval of the Design Review Permit would be vested as a Subsequent Project Approval in accordance with Section 3.4 of the Development Agreement.

## **Addendum to Sierra Point EIR**

The City of Brisbane certified the Sierra Point Final Environmental Impact Report (EIR) on May 12, 2008 for the Sierra Point Project (SCH# 200601024). Phase 1 of the Project is currently under construction. The proposed Bridge Connector Project represents a minor change to the approved approximately 540,185 square foot life sciences campus. The existing campus encompasses approximately 540,185 square feet of R&D uses in 5 separate buildings, 1,760 parking spaces in a 5-level parking structure and up to approximately 15,000 square feet of retail space in the parking structure. With the 21,000 square foot Bridge Connector, the minor modification to the campus would result in a slight increase in FAR (primarily due to the bridge square footage).

Although the proposed Bridge Connector results in a slight increase in square footage, no additional employment-generating office development is proposed, as the change is associated with a covered pedestrian walkway. This change to the Project is not significant within the meaning of triggering the need for further environmental review (see e.g., CEQA Guidelines Section 15164) because it only represents a change in the circulation system serving the approved buildings/R&D use and not an actual increase in allowable office development that would result in corresponding impacts as further summarized below. The attached memorandum dated May 2, 2019 from Scott Gregory of Lamphier-Gregory regarding the Sierra Point Biotech Project provides further analysis regarding why the proposed Bridge Connector Project would not result in new or greater significant environmental impacts.

### *Aesthetic/Visual*

- The view corridor between the two buildings is maintained as the bridge design contemplates being completely open on the first floor to allow accessibility to the site and maintain the visual clearance across the campus. Furthermore, the clearance on the first floor allows the campus Environmental design to remain as approved and does not necessitate any change in that regard.

### *Traffic Circulation*

- As explained in the attached memorandum from Fehr & Peers, although the revised Project includes approximately 21,000 SF more R&D space than was entitled in the DA, the Project's total square footage is less than the size of the Project addressed in the 2006 EIR. The revised Project is also expected to generate fewer vehicle trips during the AM and PM peak hours compared to what was analyzed in the TIS/EIR. Since the peak hour trip generation of

Mr. Ken Johnson  
May 3, 2019  
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the revised Project falls within the envelope of what was previously analyzed in the EIR and approved the addition of the Bridge Connect would not result in a substantial increase in the severity of traffic impacts compared to those evaluated in the EIR.

*GHG Emissions*

- Although the revised Project includes approximately 21,000 SF more R&D space than was entitled in the DA, the Project's total square footage is less than the size of the Project addressed in the 2006 EIR. Because the revised Project would generate fewer vehicle trips during the AM and PM peak hours, the Bridge Connector Project is not expected to result in an increase in GHG emissions.

For these reasons, the proposed Bridge Connector Project would not result in any new significant impacts or in a substantial increase in the severity of the prior environmental impacts evaluated in the EIR that would require subsequent environmental review. Based on the analysis regarding the Project's impacts, we believe the City would have substantial evidence to support the preparation of an addendum to the EIR for the Bridge Connector Project. We appreciate your interest in HCP's proposed Bridge Connector Project and look forward to working with you on our application submittal. Please don't hesitate to contact our team if you have any questions regarding our application.

Sincerely,

Scott Bohn  
Senior Vice President  
HCP LS Brisbane LLC  
HCP Life Science Estates, Inc., an HCP Company  
950 Tower Lane, Suite 1650  
Foster City, CA 94404

(D) 650-875-1007  
(C) 415-310-1892  
sbohn@hcpi.com

cc: Gerard Colomb  
Devin Bertsch  
Dawn Jedkins  
Alicia Guerra



**MEMORANDUM**

VIA: Email  
DATE: May 1<sup>st</sup>, 2019  
TO: Ken Johnson, City of Brisbane  
FROM: Scott Bohn, HCP LS Brisbane LLC

**RE: Sierra Point The Shore Development – Use Permit Parking Ratio**

Dear Mr. Johnson,

We are including this memorandum with the attached Design Permit Revision and Use Permit Applications in order to summarize and seek approval for a parking ratio for The Shore Development that is lower than our current design. As outlined in the attached Design Permit Application, we are proposing a minor design revision to Phase II of the project in order to physically connect Buildings B and C. We propose to join the buildings with an enclosed connector at floors 2 -4, which will add approximately 21,000 square feet of building area to the campus; plans and renderings of the proposed design are included with the design application.

Per the Brisbane Municipal Code (BMC) for office uses, the original 2008 entitlement provided for 1 parking stall for every 300 square feet of entitled area - a parking ratio of 3.33 per 1,000 square feet. Through design development, the Architects have endeavored to balance the programmatic and functional requirements for landscape areas, hardscape areas, site amenities, water treatment, pedestrian and vehicle access, surface parking, and structured parking in order to provide the best possible campus experience for tenants, visitors, and the public at large. This has resulted in the current design that provides a parking ratio of 3.26 per 1,000 square feet for the campus; this is reflected in Phase 1, which is fully permitted and now under construction.

As a matter of context, we offer the summary below which includes a few relevant benchmarks:

- **3.33 per 1,000 SF: The Shore** - Original Entitlement
- **3.26 per 1,000 SF: The Shore** – Current Design
- 3.23 per 1,000 SF: 6000 Shoreline Court (SSF)
- 3.16 per 1,000 SF: Sierra Point Towers – Office Use (Brisbane)
- **3.14 per 1,000 SF: The Shore** – With Proposed Connector
- 2.86 per 1,000 SF: South San Francisco Maximum Allowed (SSF)
- 2.83 per 1,000 SF: Britannia Cove Oyster Point (SSF)
- 1.82 per 1,000 SF: 3000-3500 Marina Boulevard - Entitled Life Science Buildings (Brisbane)

Based on our experience with actual life science parking demands over the last five years and in order to preserve the overall quality of the campus, we would recommend no additional parking be added if the connector is approved. Our primary considerations include:

- Resultant ratio (3.14) provides ample parking and overflow for tenants, visitors, and public
- Brisbane standards for office use exceed the actual parking needs of life science use
- Requires no increase to the size or height of the parking structure
- Requires no decrease in landscaped areas
- Requires no decrease in site open space
- Requires no decrease of site amenities
- Consistent with jurisdiction trends to manage or reduce vehicle trip generation

This recommendation is consistent with HCP's commitment to reduce drive-alone commuting as integrated in its approved TDM plan, which targets an alternative mode-use rate of 30% for transit, including carpool, vanpool, public transit options, and bicycling.



This is also consistent with other jurisdictions. San Francisco has recently abolished off-street parking minimums to reduce traffic congestion, encourage alternative means of transportation, and increase investment and usage of public transit infrastructure; South San Francisco now enforces a maximum ratio of 2.83 stalls per 1,000 square feet of entitled area.

Taking this reasoning and information into consideration, we hope that Brisbane will consider our proposal to maintain the current campus design and accept a parking ratio of 3.14 per 1,000 square feet of entitled building area if the connector is approved.

Sincerely,

Scott Bohn  
Senior Vice President  
HCP LS Brisbane LLC  
HCP Life Science Estates, Inc., an HCP Company  
950 Tower Lane, Suite 1650  
Foster City, CA 94404

(D) 650-875-1007  
(C) 415-310-1892  
sbohn@hcpi.com



# LAMPHIER-GREGORY

## Technical Memorandum

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PREPARED FOR: Scott Bohn, Senior Vice President  
HCP LS Brisbane, LLC  
950 Tower Lane, Suite 1650  
Foster City, CA 94404

PREPARED BY: Scott Gregory, President  
Lamphier-Gregory, Inc.  
1944 Embarcadero  
Oakland, CA 94606

SUBJECT: **Sierra Point Biotech Project**

DATE: May 2, 2019

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### Background and Purpose

The City of Brisbane (City) certified the Environmental Impact Report (EIR) prepared for the Sierra Point Biotech Project (Project) on May 12, 2008 (2008 EIR), pursuant to the California Environmental Quality Act (CEQA). The Project was approved by the City and its entitlements remain valid.

Since adoption of the 2008 EIR and approval of the Project, the applicant is now proposing minor changes to the Project that would result in a substantially similar use of the Project site. The Project analyzed in the 2008 EIR considered development of a life sciences research and development facility consisting of approximately 540,185 square feet of office/R&D space, 15,000 square feet of retail, and 1,760 structured and open parking spaces on approximately 22.8 vacant acres in the City of Brisbane. The now-proposed change to the Project consists of a 21,000 square-foot addition between Building D and Building E. This addition is a connecting bridge between the two buildings that would primarily contain office space and pedestrian corridors.

The purpose of this memo is to assess whether this additional building space would require subsequent CEQA analysis. CEQA Guidelines Section 15162 provides the following guidance:

- (a) When an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the



involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

### **Revisions to the Project**

The site for the additional building space is the same as the Project and is unchanged in terms of its size. The 22.8-acre site is situated easterly of Shore Line Court and southerly of Sierra Point Parkway. It is located within the Sierra Point Commercial/Retail/Office (SP-C/R/O) land use designation, and Sierra Point Commercial (SP-CRO) Zoning District. Three parcels comprise the project site: APN 007-165-080, APN 007-165-090, and APN 007-165-100.

Compared to the Project analyzed in the 2008 EIR, the minor addition would result in a buildout similar in scope and size, with only an approximate 3.7% increase in total square footage. This additional space consists of a 21,000 square-foot office space “bridge” that would be built between buildings B and C. Surface area coverage of the site would not change. The architectural design of the building connector would be consistent with the Combined Site and Architectural Design Guidelines for Sierra Point and Design Permit DP-06-05.

### **CEQA Assessment**

We have reviewed the 2008 EIR to determine whether the additional building space now being proposed could potentially result in new significant impacts or a more substantial increase in any significant impacts beyond those disclosed in the 2008 EIR. An analysis of the traffic-related implications of the proposed new building addition is provided separately, and traffic is not discussed further in this memorandum.

With the exception of the two issues highlighted below (which we do not believe to be significant CEQA impacts), we do not find anything unusual or unique about the proposed building addition that would result in any new or more substantial impacts than those already fully disclosed in the 2008 EIR.

### Transfer of Development Rights

We note that the 2008 EIR Project Description (page 52) describes a transfer of approved office space. The overall Master Plan allows for development of 630,000 square feet of office space on the project site, whereas implementation of the Project results in construction of 540,185 square feet of office/research and development space. The building square footage approved for the site under the Master Plan but not constructed by the Project (which was 89,815 square feet) may be transferred to another parcel as approved by the City. As part of the Project, the applicant was to transfer the additional 89,815 square feet of office space to Parcel 3, in the northwest corner of the Sierra Point Master Plan area.

With the now proposed 21,000 square-foot addition, the total transferred square footage from the Project would presumably be reduced by 21,000 (to 68,815 square feet).

### Scenic Vistas and Views

In its analysis of potential impacts to scenic views and vistas (page 245), the 2008 EIR notes that the Project would preserve and enhance views of the Bay through the inclusion of visual corridors. The Project would result in slightly narrower visual corridors through the site from vantage points along Shoreline Court and Sierra Point Parkway, but views through the site would be available from Shoreline Court, along Sierra Point Parkway and from the intersection of Marina Boulevard/Sierra Point Parkway. While the Project would include the construction of buildings that would obstruct existing open views of the Bay from various vantage points along Sierra Point Parkway, the Project would include visual corridors to maintain some of the views of the Bay from public roadways in the vicinity of the site. Figure IV.L-4 of the 2008 EIR provides an illustration of these anticipated visual corridors, including a corridor between Buildings B and C (where the new “bridge” office space is now proposed).

However, even with the new building addition “bridge”, the Project would still include visual corridors that maintain some of the views of the Bay from public roadways, and the specific view of the Bay between Buildings B and C would remain, but now framed by the Project’s original building edges and the “bridge” addition. This change is the Project does not seem to raise a new or substantially greater environmental impact to views and vistas than previously disclosed. Mitigation Measure VIS-2 regarding the control of light and glare would be applicable to the additional building space.

### **Other Environmental Topics**

Environmental topic areas for which the proposed building addition does not appear to have any substantial implications on the findings and conclusions of the 2008 EIR are briefly addressed below.

#### Land Use and Planning

The 2008 EIR concluded that the Project would not have the potential to cause significant impacts related to land use and planning. The proposed new building space (primarily office use) would not result in a new significant impact related to land use and planning beyond that disclosed in the 2008 EIR. The proposed office use of this building is fully consistent with land uses in the remainder of the Project.

#### Population, Employment, and Housing

The 2008 EIR concluded that the Project would not have the potential to cause significant impacts pertaining to population, employment or housing. The 2008 EIR estimated that development of the Project would result in approximately 1,800 employees. Development of the proposed 21,000 square-foot office addition between buildings B and C would result in a minor increase in the number of employees (estimated at an approximate maximum of 80 employees, assuming an average of 250 square feet per

employee), or an approximately 4.4 percent increase. These additional employees would not result in a new significant impact or a substantial increase in employment beyond that anticipated in the 2008 EIR.

#### Air Quality

The 2008 EIR calculated that operations associated with the Project would result in between 62.9 and 68.3 pounds per day of criteria pollutant emissions. Compared to the 2008 EIR threshold of 80 pounds per day, these emissions were found to be less than significant. Assuming the 21,000 square foot addition would generate operational emissions proportional to the Project, the increment of new operational emissions would be only approximately 2.5 pounds per day, not so much as to exceed threshold levels when added to the emissions as calculated for the Project.

The 2008 EIR concluded that the Original Project would have the potential to cause significant impacts related to construction air quality and recommended mitigation measures to reduce impacts to a level of less than significant. Construction of the proposed addition between buildings B and C would result in a minor increase in construction emissions, but these emissions would not be substantially more than analyzed in the 2008 EIR. Mitigation Measure AIR-1 of the 2008 EIR, which requires implementation of best management practices to control construction-period dust and emissions, would apply equally to the additional building space construction.

#### Noise

The 2008 EIR concluded that the Original Project would have the potential for significant noise impacts related to construction and aircraft noise, and recommended mitigation measures to reduce impacts to a level of less than significant. Construction of the proposed office addition between buildings D and E would result in a minor increase in the duration of construction noise but would not result in substantially more construction noise than analyzed in the 2008 EIR. Mitigation Measures NOISE-1 requiring mechanical ventilation (such as air conditioning systems) to be included in the design for Building D and Building E in order to meet the California Land Use Compatibility Guidelines for office uses would be applicable to the new space. Mitigation Measure NOISE-2 providing construction-related noise controls would also remain applicable to the construction of the additional building space.

#### Geology, Soils, and Seismicity

The 2008 EIR concluded that the Original Project would have the potential to cause significant impacts related to geology, soils, and seismicity and recommended mitigation measures to reduce impacts to a level of less than significant. Development of the proposed office addition between buildings B and C would not substantially increase the potential for geologic hazards and associated risks to humans and structures. There is nothing unusual or unique about the proposed new building space that would result in new or more significant geology-related effects. Federal, state and local regulations, best management practices and Mitigation Measures GEO-1, GEO-2, GEO-3 and GEO-4 regarding detailed geotechnical investigations, building code requirements and inspections would continue to apply to the additional building space to ensure that no significant impacts would occur.

#### Hydrology and Water Quality

The 2008 EIR concluded that construction of the Project would have the potential to cause significant impacts related to water quality, and recommended mitigation measures to reduce impacts to a level of less than significant. Construction of the new building space buildings B and C would result in a minor increase in construction and associated potential for construction-related water quality degradation. However, the water quality effect would not be new or substantially more severe than those already

addressed in the 2008 EIR. Federal, state and local regulations, best management practices and Mitigation Measures HYDRO-1 and HYDRO-2 requiring preparation of a SWPPP and an erosion control plan would continue to apply to the new building space to ensure that no significant impacts would occur.

### Biological Resources

The 2008 EIR concluded that the Project's grading and construction would have the potential to cause significant impacts related to biological resources and recommended mitigation measures to reduce impacts to a level of less than significant. Development of additional building space between buildings B and C would not result in increased grading and only a minor increase in construction activity than was analyzed in the 2008 EIR. Mitigation Measures BIO-1, BIO-2, BIO-3 and BIO-4 requiring pre-construction surveys for burrowing owls, protection of water quality during grading, and tree removal requirements would equally apply to the new building space to ensure that no significant impacts would occur.

### Hazards and Hazardous Materials

The 2008 EIR concluded that the Original Project would have the potential to cause significant impacts related to hazards and hazardous materials, and recommended mitigation measures to reduce impacts to a level of less than significant. Development of additional building space between buildings B and C would result in a minor increase in the use, storage or disposal of hazardous materials, but such use would not be substantially more than analyzed in the 2008 EIR. Federal, state and local regulations, best management practices and Mitigation Measures HAZ-1, HAZ-2 and HAZ-3 requiring establishment of emergency preparedness procedures, a Stormwater Pollution Prevention Plan, Title 27 compliance for landfill coverage integrity and standards for lab animal care would equally apply to the new building space to ensure that no significant impacts would occur.

### Public Services and Recreation

The 2008 EIR concluded that the Original Project would not have the potential to cause significant impacts for the environmental topic area of public services and recreation. As noted in the 2008 EIR, the Project is located on a site already provided with public services consistent with growth assumptions, and no facility improvements are required to accommodate future demand. Development of the addition office space between buildings D and E would result in a minor increase in the number of employees in the area, but would not result in a substantial increase in the demand for public services and recreation.

### Utilities and Infrastructure

The 2008 EIR concluded that the Project would have the potential to cause significant impacts related to utilities and infrastructure, and recommended mitigation measures to reduce impacts to a level of less than significant. Development of the office addition between buildings D and E would result in a minor increase in the number of employees in the area with related minor utility and infrastructure demands, but the increased utility demands would not be substantially more than analyzed in the 2008 EIR. Mitigation Measures Util-1 through UTIL-7 would fully apply to the new office space such that no significant impacts would occur.

## **Conclusions**

Given the conclusions above:

- (1) The proposed new building space would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- (2) There are no changes in circumstances that would result in a new significant environmental effect or a substantial increase in the severity of previously identified significant effects; and
- (3) There is no new information resulting in a new significant effect or a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

This assessment demonstrates that the 2008 EIR provides adequate environmental review to address the proposed 21,000 square feet of new office building space to be added to the Project. The 2008 EIR continues to serve as the applicable environmental review document pursuant to the requirements of CEQA for approval of the Project, and the mitigation measures identified in the 2008 EIR remain fully applicable.



## MEMORANDUM

Date: April 23, 2019  
To: Devin Bertsch, Project Management Advisors, Inc.  
From: Mike Hawkins, PE and Jane Bierstedt, PE, Fehr & Peers  
**Subject: Sierra Point Trip Generation Comparison**

*SF19-1030*

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This memorandum presents the results of the trip generation comparison for the proposed development at Sierra Point (the "Project"). The Project was previously studied and environmentally cleared in 2006; the Environmental Impact Report (EIR) was published in November 2006. The EIR included the results of a Transportation Impact Study (TIS) prepared by Hexagon Transportation Consultants in November 2006 to identify potential significant impacts of the Project on the transportation system. The currently proposed Project has changed slightly from the Project analyzed in 2006. As part of this analysis, Fehr & Peers reviewed the previously prepared TIS, prepared trip generation estimates for the current Project based on more recent data, compared the results to the trip generation estimates in the TIS, and used the results to assess whether new or more severe transportation impacts are likely.

When the EIR was published in 2006, California Environmental Quality Act (CEQA) transportation analyses used intersection and freeway segment level of service (LOS) analyses to identify environmental impacts. California Senate Bill 743 (SB 743) was recently enacted and it changes the way that transportation impacts are analyzed under CEQA. Accordingly, the Office of Planning and Research (OPR) released updates to the CEQA Guidelines to include vehicle miles traveled (VMT) instead of LOS as the metric for identifying significant impacts. Since the City of Brisbane has not yet adopted new impact criteria, LOS may still be considered as the impact criteria. Potential impacts due to increases in intersection turning movement and freeway volumes from the time the transportation analysis was conducted in 2006 are also addressed.



## Project Characteristics

The Project site is located just east of Shoreline Court on Sierra Point Parkway in Brisbane, California. The Project site is currently vacant. Vehicular access to the site would be provided via Roebling Road and Grand Avenue.

The TIS prepared in 2006 analyzed a Project that included up to 630,000 square feet (SF) of research and development (R&D) and 2,500 SF of retail. However, per the Development Agreement (DA), the Project was entitled for 540,185 SF of R&D and 15,000 SF of retail. The Project description has since been revised to include a new 21,000 SF connector bridge between two proposed buildings, bringing the total building size to 561,000 SF of R&D plus 15,000 SF of retail. The bridge would likely include less intensive R&D uses than the rest of the building area; however, for this analysis it is conservatively assumed to be all R&D space at the same intensity as the rest of the Project.

## Trip Generation Comparison

Trip generation refers to the process of estimating the amount of vehicular traffic a project might add to the roadway network. In addition to estimates of daily traffic, estimates for the peak one-hour periods during the weekday morning (AM) and evening (PM) commute periods, when traffic volumes on adjacent streets are typically at their highest, are also created.

The TIS used average trip generation rates published in *Trip Generation Manual, 7<sup>th</sup> Edition* (Institute of Transportation Engineers - ITE, 2003) to estimate trip generation for the Project. That document contains data based on research conducted at sites throughout the United States over the past several decades for various land use types. **Table 1** summarizes the Project trip generation as presented and analyzed in the TIS.



**Table 1: TIS Trip Generation**

Land Use	Size (KSF) <sup>1</sup>	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
R&D <sup>2</sup>	630	648	133	781	102	578	680
Retail <sup>3</sup>	2.5	2	1	3	5	5	10
<b>Total Trips</b>		<b>650</b>	<b>134</b>	<b>784</b>	<b>107</b>	<b>583</b>	<b>690</b>

Notes:

1. KSF = thousand square feet
2. Based on *Trip Generation Manual 7<sup>th</sup> Edition* (2003) rates for land use 760
3. Based on *Trip Generation Manual 7<sup>th</sup> Edition* (2003) rates for land use 820

Source: Institute of Transportation Engineers, 2003; Hexagon Transportation Consultants, 2006; Fehr & Peers, 2019

ITE regularly publishes updates to the *Trip Generation Manual*, with the most recent edition being published in 2017 (10<sup>th</sup> Edition). Comparing peak hour trip generation rates contained in the two editions shows that 10<sup>th</sup> Edition rates are significantly lower than 7<sup>th</sup> Edition rates for R&D land use and would result in far fewer peak hour trips for the Project. In order to maintain consistency and to present a more conservative analysis, trip generation for the revised Project is calculated using the 7<sup>th</sup> Edition rates and compared to the estimates presented in the TIS. **Table 2** summarizes the Project trip generation for the revised Project description, using the same trip rates as used in the TIS.





**Table 2: Updated Trip Generation Estimates and Comparison to the TIS/EIR**

Land Use	Size (KSF) <sup>1</sup>	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
R&D <sup>2</sup>	561	574	118	692	90	512	603
Retail <sup>3</sup>	15	9	6	15	27	29	56
<b>Total Trips</b>		<b>584</b>	<b>124</b>	<b>707</b>	<b>117</b>	<b>541</b>	<b>659</b>
<i>TIS/EIR Trips</i>		<i>650</i>	<i>134</i>	<i>784</i>	<i>107</i>	<i>583</i>	<i>690</i>
<b>Net Difference<sup>4</sup></b>		<b>-66</b>	<b>-10</b>	<b>-76</b>	<b>+11</b>	<b>-42</b>	<b>-31</b>

Notes:

1. KSF = thousand square feet
2. Based on *Trip Generation Manual 7<sup>th</sup> Edition* (2003) rates for land use 760
3. Based on *Trip Generation Manual 7<sup>th</sup> Edition* (2003) rates for land use 820
4. TIS/EIR estimates minus current estimates

Source: Institute of Transportation Engineers, 2003; Fehr & Peers, 2019

As shown in Table 2, with an additional 21,000 square feet of R&D space and the DA size of the retail space, the revised Project would be expected to generate fewer overall peak hour vehicle trips compared to the trip estimates analyzed in the TIS/EIR. The only increase in vehicle trips with the revised Project is a slight increase in inbound trips in the PM peak hour due to the increase in retail space.

## VMT and LOS

The reduction in vehicle trips would also cause a reduction in vehicle miles traveled (VMT) compared to the previous project description. The reduction in trips alone may be insufficient to conclude that the Project would cause no new transportation impacts if intersection and freeway segment level of service (LOS) is considered. Increases in traffic volumes since 2006 may cause additional intersections or freeway segments to exceed their LOS thresholds due to the addition of Project traffic. Therefore, a comparison of 2019 volumes to 2006 volumes may be needed.

## Conclusions

The TIS prepared in 2006 identified several potentially significant impacts to the study intersections and freeway segments under Existing and Cumulative scenarios. All of the significant impacts to intersections were reduced to less-than-significant levels with implementation of the identified



mitigation measures. Under Cumulative conditions, significant impacts were identified for several freeway segments which were considered significant and unavoidable.

Although the revised Project includes approximately 21,000 SF more R&D space than was entitled in the DA, the Project's total square footage is less than what was environmentally cleared by the 2006 EIR. The revised Project is also expected to generate fewer vehicle trips during the AM and PM peak hours compared to what was analyzed in the TIS/EIR. Since the peak hour trip generation of the revised Project falls within the envelope of what was previously analyzed and approved, the impacts are expected to be similar to those presented in the EIR and the mitigation measures identified in the EIR would continue to be appropriate for the revised Project.

As previously mentioned, the original EIR was completed and published in November 2006; intersection turning movement counts used in the transportation analysis were also taken in 2006. Existing traffic conditions near the site may have changed since 2006 which may result in different intersection analysis results. Recent counts could be compared to the 2006 counts to assess whether the changes are substantial.