

ADDENDUM No. 1
Administrative Support Building
Children’s Hospital and Research Center Oakland
Campus Master Plan Project Environmental Impact Report
State Clearinghouse Number 2013072058

April 24, 2023

This Addendum discusses proposed minor revisions to the UCSF Benioff Children’s Hospital Oakland (“BCH Oakland”) Campus Master Plan, in relation to the requirements of the California Environmental Quality Act (“CEQA”).

1. Background

In 2014, the University of California San Francisco (“UCSF”) entered into an affiliation agreement with Children’s Hospital & Research Center Oakland (“CHO”), to align the two institutions based on the shared mission of serving the health care needs of all children, regardless of race, religion, or financial status. At that time, a Campus Master Plan (“CMP”) for the 11-acre campus, which provided for the development of new and replacement facilities within the existing campus, was already under review by the City of Oakland, which maintained land use jurisdiction and CEQA lead agency status for the site as CHO was then a solely private institution.

In 2015, the City of Oakland certified the Children’s Hospital and Research Center Oakland (CHRCO) EIR and approved the CMP. The entitlements for the CMP included, among other things, a Planned Unit Development (PUD) permit, which consisted of two phases:

- Phase 1: The Preliminary Development Plan (“PDP”) and Final Development Plan (“FDP”) for Phase 1 were approved in 2015. Phase 1 included construction of an outpatient building, interior renovations to campus buildings, circulation improvements, demolition of a residential structure, and modifications to two residential structures. Construction of the improvements included in Phase 1 is still in progress.
- Phase 2: Phase 2 included the construction of a Clinical Support Building (now named the Administrative Support Building), a new Acute Care Patient Pavilion, the Link Building with a helipad on the roof, a Family Residence Building, expansion of the central utility plant, new parking structure, and demolition of several buildings. The PDP for Phase 2 was approved in 2015. An FDP for Phase 2 has not been approved.

Following the 2014 agreement between CHO and UCSF, the hospital was renamed UCSF Benioff Children’s Hospital, Oakland (UCSF BCH Oakland). While the hospital is still under the management control of UCSF BCH Oakland, a non-profit public benefit corporation, the UC Regents are the sole member of the nonprofit.

As UCSF BCH Oakland campus site is controlled by the University, UCSF has revised its approach to the modernization of the campus site. UCSF has therefore reduced the scope of Phase 2 development compared to the Phase 2 analyzed in the CMP Project EIR, to include certain development north of 52nd Street: the relocation of two structures at 688 52nd Street and 682 52nd Street; demolition of two structures at 5212 Dover Street and 665 53rd Street; and the new construction of the Administrative Support Building (“ASB”). As all of the proposed improvements in the revised Phase 2 are related to the development of the ASB, the revised Phase 2 is hereinafter referred to as the ASB and Associated

Structures Relocation Project (“ASB Project”). The purpose of the ASB Project is to provide relocation space for clinical support and administrative functions currently located in buildings that do not meet UC Seismic Policy but need to be relocated near the hospital functions.

The ASB Project is proposed on land controlled by the University and would further the University’s educational mission. Under the provisions of CEQA Guidelines Sections 15381, 15096, and 15164(a), the University, acting as Responsible Agency for the ASB Project, has completed a review of the ASB Project and prepared an Addendum to the CMP Project EIR. UCSF has also committed to complying with all applicable Standard Conditions of Approval (SCAs) for the development of the ASB Project identified by the City of Oakland in the CMP Project EIR and the 2015 entitlements. The University will use this Addendum, along with the CMP Project EIR, in connection with its decision whether or not to approve the ASB Project as proposed.

2. ASB Project

The ASB Project includes the majority of Phase 2 components located north of 52nd Street and east of Dover Street. The individual components of the ASB Project are described below.

1. **Demolition of Structures:** The following two structures would be demolished:
 - a. The approximately 2,253 square-foot structure at 5212 Dover Street would be demolished. This structure is owned by the BCH Oakland and is vacant and used for incidental storage.
 - b. The approximately 2,800 square-foot structure at 665 53rd Street would be demolished. This modular structure is also owned by the BCH Oakland and used for office space.
2. **Relocation of Structures:** Following the demolition of the modular building at 665 53rd Street, the two BCH Oakland-owned structures at 688 52nd Street and 682 52nd Street would be relocated to 665 53rd Street. The relocated structures would continue to provide office space.
3. **Administrative Support Building:** An approximately 31,300 gross-square-foot (gsf), three-story ASB would be constructed on the northeast corner of 52nd and Dover Street intersection at the site currently occupied by 5212 Dover Street and 682 and 688 52nd Street structures. The proposed building would have reduced setbacks from Dover and 52nd Street which are allowable under the Oakland Municipal Code. The proposed building would contain critical support and administrative functions.

There would be no increase in the number of patient visits or employees on the campus from the construction of the proposed ASB. No clinical functions would be located in the new building. Therefore, no patient visits would occur and the number of patient visits at the BCH Oakland campus would not change compared to existing conditions. Approximately 150 administrative and support staff would occupy the building. These employees are currently located in the A/B and B/C Wings of the existing hospital, and other buildings on the campus. Under California Senate Bill (SB) 1953, to remain an acute care facility past 2030 the A/B and B/C Wings are required to undergo a seismic retrofit, or the space must be decommissioned. To comply with California Seismic Code, hospital staff in the A/B and B/C Wing would be relocated to the ASB and the vacated space would be decommissioned and used for only non-active uses such as storage. The B/C Wing would remain in place and continue to serve as passage between the loading dock and the Main Hospital complex.

4. **Other Components:** In addition to the above, the ASB Project includes the following:

- A service vehicle turnaround would be constructed at the ASB service driveway off 52nd Street. As a portion of the turnaround would be constructed on the adjacent Caltrans property, an encroachment permit would be required to construct the turnaround on Caltrans property and a land lease from Caltrans would be required to continue to use the turnaround once it is constructed. Approximately 2,140 square feet of Caltrans property would be leased for the turnaround.
- Instead of placing the ASB transformer inside the new building, UCSF proposes to place it outside the ASB building on BCH Oakland property outside of public walkways or road right of way which will be in substantial compliance with the Oakland Municipal Code. The proposed location of the transformer is on the north side of the ASB at a setback of about 9 feet from the ASB and about 24 feet from Dover Street curb. The transformer, which would step down the electricity received from the grid, would be placed on a concrete pad in a tamper-proof utility cabinet. To minimize electrical hazard, the unit would be secured and labeled with warning signs.
- There would be a small change in the amount of parking on the campus as a result of the ASB Project. On-street parking would increase by one (1) space, and off-street parking would decrease by 5 to 6 spaces due to the development of the ASB and parking changes at 665 53rd Street.
- Implementation of the ASB Project would also require the removal of up to six (6) protected trees and construction within 10 feet of three other protected trees.¹
- There would be temporary relocation of staff while the project is under construction. The occupants of the two buildings to be demolished (665 53rd Street and 5212 Dover Street) would temporarily move into 770 53rd Street and 4701 Shattuck Avenue which are BCH-owned spaces. The occupants of the two buildings to be relocated (682 and 688 52nd Street) would temporarily move to 670 53rd Street and staff currently at that location would move to 6425 Christie Avenue which is an existing leased space in Emeryville. Finally, some staff located in 682 and 688 52nd Street structures would move into 707 53rd Street. The moves would require minor interior improvements, such as patch, paint and IT equipment relocations, to serve the temporarily relocated staff.

According to the CMP, as part of Phase 2 development, UCSF BCH Oakland was to acquire approximately 1.5 acres of land along the eastern edge of the campus site, including land between 52nd and 53rd Streets from Caltrans. Acquisition of the majority of that land has been completed.

Relocation and demolition of the four structures to clear the ASB site is scheduled to begin in June 2023 and be completed by January 2024. Construction of the ASB would begin in February 2024 and be completed by January 2026.

3. Comparison of the ASB Project to the Phase 2 Components in the CMP

¹ Protected trees are trees that meet specific criteria listed in the City of Oakland tree ordinance.

Table 1 below lists each component of the ASB Project and compares it to the same component in the CMP in order to identify any differences that might have the potential to result in new or more severe environmental impacts than previously identified for that project component in the CMP Project EIR.

Table 1: Comparison of ASB Project to Phase 2 Components in the CMP

| Component | ASB Project | CMP Phase 2 |
|---|--|--|
| Structure at 5212 Dover Street | Demolish | Demolish |
| Structure at 665 53rd Street | Demolish | Demolish |
| Structure at 682 52nd Street | Relocate to 665 53rd Street | Relocate to 665 53rd Street |
| Structure at 688 52nd Street | Relocate to 665 53rd Street | Relocate to 665 53rd Street |
| Administrative Support Building (previously referred to as Clinical Support Building) at the Dover and 52nd Street intersection | <p>31,300 gsf, 3-story building with 0-foot setback from Dover Street and 5-foot setback from 52nd Street</p> <p>All persons accommodated in the new building would be existing employees relocated from the B/C Wing and other existing buildings on the campus.</p> <p>B/C Wing would be vacated and decommissioned.</p> | <p>31,300 gsf, 3-story building with a 20-foot setback from Dover Street and 10-foot setback from 52nd Street¹</p> <p>All persons accommodated in the new building would be existing employees relocated from the B/C Wing and other existing buildings on the campus.</p> <p>B/C Wing would be vacated and demolished.</p> |
| PG&E Transformer for ASB | The ASB would either be served by an existing transformer on the campus, or by a new transformer located outside and to the north of the ASB. | The approved PDP included SCA #49 which requires that “The Project applicant shall coordinate with PG&E regarding the placement of transformers. These utilities shall be located within the proposed building and not within the public right of way or sidewalk.” |
| Parking | The ASB project would add one new on-street parking space and remove 5 to 6 off-street parking spaces, for a net change of 4 to 5 fewer parking spaces. | Phase 2 of the CMP provides for a reduction in parking spaces in the area north of 52nd Street due to the redevelopment of the area. |
| Protected Tree Removal | Six (6) protected trees would be removed. | The CMP provides for the removal of 90 protected trees on the campus site. |

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|------------------------|---|---|
| ASB Vehicle Turnaround | A land lease would be needed from Caltrans for the vehicle turnaround associated with the ABS service area. An encroachment permit would be needed from Caltrans for the construction of the turnaround. | The turnaround was not specifically identified in the CMP as this level of detail was not available at that time. |
| Temporary Relocations | Staff in the buildings to be demolished and relocated would temporarily be moved to BCH-owned or existing leased spaces for the duration of project construction. Only minor interior modifications would be needed in those spaces to accommodate the temporarily relocated staff/functions. | Temporary relocations off-campus are not specifically identified in the CMP as this level of detail was not available at that time. |

1. Due to a clerical error, the setbacks of the proposed building as depicted in the PDP plans were incorrect. With these setbacks, the mass of the proposed building would not be accommodated in the identified site for the building.

4. Addendum to the CMP Project EIR

This Addendum was prepared to evaluate whether the ASB Project may constitute substantial changes or new information as compared to the prior environmental analysis prepared for and disclosed in the CMP Project EIR. CEQA Guidelines Section 15162 calls for the preparation of a subsequent EIR or Negative Declaration if certain conditions have been met. These conditions include:

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 or 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.

The University has completed a detailed review of the ASB Project relative to these conditions, and has determined that, pursuant to CEQA Guidelines Section 15162, a subsequent EIR or Negative Declaration need not be prepared because:

- a) The ASB Project is within the scope of development analyzed in the CMP Project EIR, and will not result in new or more severe environmental impacts than previously disclosed.
- b) The ASB Project would not require new mitigation measures or result in mitigation measures that are considerably different from those analyzed in the CMP Project EIR.
- c) Since the CMP Project EIR was certified, no new projects have been proposed or developed in the vicinity of the proposed ASB Project which could affect the prior analyses, including the analysis of cumulative impacts.
- d) There are no changes in the circumstances in which the ASB Project would be undertaken which could result in new significant impacts previously not disclosed.

Analysis in support of these findings is presented below.

4.1 LAND USE AND PLANNING

Section A in Chapter IV of the CMP Project EIR analyzed the land use and planning impacts that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) physically divide an established community;
- (2) result in a fundamental conflict between adjacent or nearby land uses;
- (3) fundamentally conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect and actually result in a physical change in the environment; or
- (4) fundamentally conflict with any applicable habitat conservation plan or natural community conservation plan.

The impact analysis, which is presented on pages 178 to 184 of the CMP Project EIR, concluded that all of the CMP Project's land use and planning impacts, including cumulative impacts, would be less than significant, and no mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the approved CMP, the land use and planning impacts remain unchanged.

ASB Setbacks. As noted in Section 3 above, due to a clerical error, the PDP plans depicted the Clinical Support Building as set back by approximately 10 feet from 52nd Street and by approximately 20 feet from Dover Street. However, the proposed ASB cannot be accommodated on the site with these setbacks, and reduced setbacks of 5 feet and 0-foot on 52nd and Dover Street respectively are required. Although per the Oakland Municipal Code, these setbacks must be a minimum of 10 feet, the Oakland Municipal Code authorizes the City to grant requests to waive or modify minimum yard and other dimensional requirements “for the purpose of promoting an integrated site plan.” The modification of the setbacks on Dover and 52nd Streets would promote UCSF BCH Oakland’s integrated site plan for its campus for the following reasons:

- Shorter setbacks would allow for the massing of the ASB as it was approved in 2015. The massing of this structure is consistent with other elements of the UCSF Benioff Children’s Hospital Oakland’s Master Plan, and it is complementary to the integrated site plan for the campus because its scale and siting fits the architectural pattern of the campus.
- Shorter setbacks are consistent with existing Hospital structures located in the Master Plan area, most notably with respect to the Main Hospital structure consisting of the “Patient Tower” and the “Ford Diagnostic and Treatment Center and Cardiac Catheterization Lab,” as that combined structure is identified in the 2015 approvals. (See CMP Project Draft Environmental Impact Report, Existing Structures #20 and #21, Fig. III-6.) This structure (effectively composed of two structures) has been built up to the property line and has no setback from either 52nd Street or the portion of Dover Street that is located south of 52nd Street.
- From an architectural perspective, by reducing the setback on Dover Street, the ASB is set apart from the residential structures as a typology and therefore is more identifiable as a campus building, thereby promoting an integrated campus site plan. The reduced setback on Dover Street also de-emphasizes the corresponding façade in relation to the 52nd Street façade, making the entry and landscaping along 52nd Street more prominent, which is consistent with the existing pattern of development along 52nd Street.

Therefore, even with reduced setbacks, the ASB Project would be substantially consistent with the Oakland Municipal Code. Furthermore, as the analysis in this assessment shows, the shorter setbacks would not result in new or substantially more severe environmental impacts than previously disclosed in the CMP Project EIR.

ASB Service Vehicle Access & Turnaround. As noted earlier, the ASB Project reflects refinements to the ASB site plan that include an off-street service area located to the east of the building. Providing an off-street space for service vehicles would eliminate conflicts between building operations and on-street parking and would better separate public-facing activities from back-of-house activities. In order to effectuate this adjustment, access to a small amount of additional land under the freeway would be provided by Caltrans via an encroachment permit and land lease. Although the ASB service vehicle turnaround was not identified in the CMP, the CMP Project EIR did note that “a portion of the Caltrans SR 24 right-of-way between the CHRCO campus and SR 24 would be acquired to accommodate the proposed Clinical Support Building and Parking Garage and to provide a walkway and additional open space.” The site of the turnaround is adjacent to the area that has been acquired from Caltrans. It is adjacent to and underneath the 52nd Street freeway on-ramp and not adjacent to any sensitive land uses.

Furthermore, the turnaround is internal to the campus site and as noted in the CMP Project EIR, “Changes to the interior circulation pattern are intended to result in improvements to vehicular, pedestrian, and bicycle safety and would not conflict with adjacent uses.” As the area to be leased is internal to the campus site and is not near off-campus residential land uses, the inclusion of the turnaround in the ASB Project would not result in any new or substantially more severe land use impacts than previously disclosed in the CMP Project EIR.

PG&E Transformer. City of Oakland SCA #49 related to the 2015 approvals stated that “The Project applicant shall coordinate with PG&E regarding the placement of transformers. These utilities shall be located within the proposed building and not within the public right of way or sidewalk.” The transformer required for the ASB would be located on property owned by BCH Oakland to the north of the ASB, i.e., on property that is not within the public right of way or sidewalk. As an alternative, UCSF is also coordinating with PG&E to discuss whether the ASB’s electrical utilities could be tied into the existing transformer currently located to the northwest of the property. UCSF believes this is consistent with the intent of SCA #49, which is to ensure transformers are not located on public property in such a way that they block access along public rights of way or sidewalks. There would be no new or substantially more severe significant land use impacts from the placement of the transformer.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe land use impacts because the spaces are intended for office and related uses.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to land use or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant land use impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.2 AESTHETICS AND SHADOW

Section B in Chapter IV of the CMP Project EIR analyzed the aesthetics, shadow and wind impacts that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Have a substantial adverse effect on a public scenic vista;
- (2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, located within a state or locally designated scenic highway;
- (3) Substantially degrade the existing visual character or quality of the site and its surroundings;
- (4) Create a new source of substantial light or glare which would substantially and adversely affect day or nighttime views in the area;
- (5) Cast shadow that substantially impairs the function of a building using passive solar heat collection, solar collectors for hot water heating, or photovoltaic solar collectors;
- (6) Introduce landscape that would now or in the future cast substantial shadows on existing solar collectors (in conflict with California Public Resource Code sections 25980-25986);

(7) Cast shadow that substantially impairs the beneficial use of any public or quasi-public park, lawn, garden, or open space;

(8) Cast shadow on an historic resource, as defined by *CEQA Guidelines* Section 15064.5(a), such that the shadow would materially impair the resource's historic significance by materially altering those physical characteristics of the resource that convey its historical significance and that justify its inclusion on or eligibility for listing in the National Register of Historic Places, California Register of Historical Resources, Local Register of historical resources, or a historical resource survey form (DPR Form 523) with a rating of 1-5;

(9) Require an exception (variance) to the policies and regulations in the General Plan, Planning Code, or Uniform Building Code, and the exception causes a fundamental conflict with policies and regulations in the General Plan, Planning Code, and Uniform Building Code addressing the provision of adequate light related to appropriate uses; or

(10) Create winds that exceed 36 mph for more than one hour during daylight hours during the year.

The impact analysis, which is presented on pages 203 to 216 of the CMP Project EIR, concluded that all of the CMP Project's aesthetics, shadow and wind impacts, including cumulative impacts, would either be less than significant, or would be less than significant with the implementation of the City's SCAs, and no mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the aesthetics, shadow, and wind impacts remain substantially unchanged.

ASB Setbacks. The analysis of the Clinical Support Building in the CMP Project EIR assumed a 3-story building at the corner of 52nd and Dover Streets, with a 10-foot setback on 52nd Street that would be planted with street trees and landscaping. As noted above, although the height and mass of the ASB would be the same as the previously analyzed Clinical Support Building, due to a clerical error, the setbacks of this building as depicted in the PDP plans were incorrect, and that with these setbacks, the mass of the proposed building would not be accommodated in the identified site for the building. Instead of a 10-foot setback, the 52nd Street setback of the proposed building would be 5-feet wide. However, the project would still provide a sidewalk and landscaping, including three street trees that would be planted along this frontage of the building. Therefore, despite the narrower setback, the street frontage would be landscaped and the ASB would not result in a greater impact on the visual character of the area than previously disclosed in the CMP Project EIR and no new mitigation would be required. With regard to the Dover Street setback of the ASB, instead of the previously assumed 20-foot setback a 0-foot setback is planned. However, the street frontage on Dover Street would still include a sidewalk and landscaping, including two street trees. As a result, the impact on visual character of the area would remain less than significant.

The reduced setback would not result in greater shadow impacts on historical resources than previously disclosed. As stated in the CMP Project EIR, "the proposed Clinical Support Building would be located across Dover Street from 5203 Dover Street which is also a contributing resource (to the 55th and Dover Residential District). However, due to the relatively low scale of the proposed building and distance from the residential structure (about 50 feet), it is not anticipated that the proposed 3-story Clinical Support Building would cast new shade or shadows onto this structure such that its significance as a contributing

resource would be materially impaired.” With a 0-foot setback, the distance between the ASB and 5203 Dover Street structure would be about 30 feet. At this distance too, the planned building would not cast new shade or shadows onto the structure such that its significance as a contributing resource would be materially impaired. The impact would continue to be less than significant, and no new mitigation is required.

ASB Service Vehicle Access & Turnaround. As noted earlier, the site of the turnaround is adjacent to and underneath the 52nd Street freeway on-ramp. As a result, it is not visible from many locations due to the presence of intervening buildings and freeway structures in the area. Further, the turnaround would not include any improvements that would be visible from public vantagepoints, including the viewpoints analyzed in the CMP EIR. The inclusion of the turnaround in the ASB Project would not result in new or substantially more severe significant visual impacts than previously disclosed in the CMP Project EIR.

PG&E Transformer. As noted above, although UCSF is working with PG&E to determine whether the ASB’s electrical utilities could be tied to the existing transformer in the area, in the event that a new transformer is needed, it would be located outside and to the north of the ASB. As described above, the transformer would be located on a concrete pad in a utility cabinet, similar to other transformers that are commonly observed in urban areas, including the transformer located outside the Family House building on Dover Street. Due to its small size and location north of the ASB outside of public views, the transformer would not result in new or substantially more severe significant visual or shadow impacts.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe visual or shadow impacts because only minor interior work is proposed.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to aesthetics, shadow or wind or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant aesthetics, shadow or wind impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.3 CULTURAL AND HISTORIC RESOURCES

Section C in Chapter IV of the CMP Project EIR analyzed impacts on cultural and historical resources that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Cause a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5. Specifically, substantial adverse changes include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be “materially impaired.”
- (2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to *CEQA Guidelines* §15064.5;
- (3) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or

(4) Disturb any human remains, including those interred outside of formal cemeteries.

The impact analysis, which is presented on pages 244 to 256 of the CMP Project EIR, concluded that with the implementation of the Rehabilitation Standards of the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, the CMP project's impacts on historical resources would be less than significant, and with the implementation of the City's SCAs listed in the EIR, the project's impacts on archaeological resources, human remains, and paleontological resources would be less than significant. The project's cumulative impact would also be less than significant. No further mitigation was required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the impacts on archaeological resources, human remains, and paleontological resources remain substantially unchanged. With respect to historical resources, an evaluation was completed by Architectural Resources Group (ARG) in October 2022 to determine whether the ASB Project could result in new or substantially more severe significant impacts on historical resources than previously analyzed and disclosed in the CMP Project EIR. The results of ARG's evaluation are presented below.

Demolition of Structures at 5215 Dover Street, 665 53rd Street, and 688 52nd Street Garage. ARG concluded that the demolition of the structures located at 5215 Dover Street, 665 53rd Street, and 688 52nd Street Garage would not result in a significant impact on historical resources because (1) neither of the two properties is located within the revised 2013 boundary of the 55th and Dover Residential District, and (2) neither property should be considered a historical resource for purposes of CEQA. Similarly, the small garage associated with 688 52nd Street does not meet the criteria of a historical resource and its removal would not be a significant impact on a historical resource (ARG 2022).

Removal and Relocation of 682 and 688 52nd Street Structures. With regard to the structures at 682 and 688 52nd Street, both buildings were determined to not meet the criteria of historical resources so their removal would not affect historical resources. Furthermore, the relocation of the two buildings to 53rd Street would help restore the integrity of setting of the district contributors along 53rd Street, by replacing the existing 665 53rd Street modular building with buildings that are much more similar in scale to the early twentieth-century residences that previously occupied the site and are also present to the north of the street (ARG 2022).

ASB. The proposed site of the ASB is located outside the revised 2013 boundary of the 55th and Dover Residential District and the new building will replace three buildings (described above) that are not considered contributors to that district. District contributors in the immediate vicinity of the proposed ASB site are limited to the two southernmost district contributors: 5302 Dover Street and 720 52nd Street. The two contributors are surrounded on three sides by new construction, which was already in place when 5302 Dover Street and 720 52nd Street were determined to be contributors to the CRHR-eligible district in 2013.

According to ARG, while necessarily of a larger scale than these nearby district contributors, aspects of the ASB's proposed design enhance its compatibility with its surroundings. In particular, horizontal banding and a pronounced canopy emphasize the building's first story, reinforcing the pedestrian scale while breaking up the building's overall mass. In addition, the use of vertical fins and inset glazing reference the feel of punched windows while maintaining a contemporary appearance. ARG concluded that the buildings at 5302 Dover Street and 720 52nd Street would continue to convey their historic significance as contributors to the district even if development of the ASB would potentially reduce the integrity of their setting (ARG 2022).

PG&E Transformer and Service Vehicle Turnaround. The transformer and the service vehicle turnaround would be located in areas that are outside the historic district boundaries. These components would also be distant from other existing historic structures and would therefore not affect the integrity of the setting of any historical building in the project area. The ASB Project would also implement all applicable SCAs to avoid and minimize impacts on cultural resources. No new mitigation is required.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe cultural resource impacts. Although some of the buildings that would be used for the temporary relocations (770 53rd Street, 670 53rd Street, and 707 53rd Street) are considered historical resources, the Project would not adversely affect the resources because no exterior changes would be made to these or the off-campus buildings in order to relocate UCSF BCH Oakland staff and the interior improvements in all of the buildings would be limited to patch, paint, and IT equipment relocation.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to historical resources, archaeological resources, human remains, and paleontological resources or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant impacts on historical resources, archaeological resources, human remains, and paleontological resources than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.4 TRANSPORTATION

Section D in Chapter IV of the CMP Project EIR analyzed impacts on transportation and circulation that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
- (2) Directly or indirectly cause or expose roadway users (e.g., motorists, pedestrians, bus riders, bicyclists) to a permanent and substantial transportation hazard due to a new or existing physical design feature or incompatible uses;
- (3) Fundamentally conflict with adopted City policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities adopted for the purpose of avoiding or mitigating an environmental effect and actually result in a physical change in the environment;
- (4) Result in a substantial, though temporary, adverse effect on the circulation system during construction of the project; or
- (5) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

The impact analysis, which is presented on pages 316 to 353 of the CMP Project EIR, concluded that the project's impacts on the operations of the study intersections (level of service or LOS impacts) would be less than significant under 2020 and 2035 conditions. The analysis also found that the CMP Project would not expose roadway users to a transportation hazard due to a new design feature; conflict with city policies regarding transit, bicycle and pedestrian facilities; and with the implementation of the City of Oakland SCAs it would not result in a temporary impact on the circulation system during construction of the CMP Project. The project would not affect air traffic patterns. The project's cumulative impacts would also be less than significant. No further mitigation was required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the impacts on transportation and circulation remain substantially unchanged. The ASB Project would also implement applicable SCAs to minimize transportation impacts. No new mitigation is required.

ASB Service Vehicle Access & Turnaround. The CMP Project EIR evaluated access and circulation for the project components that were defined at the time. However, the EIR did not address vehicular access for the ASB element of the project because certain aspects of the ASB, including the means of ingress and egress for the ASB, were speculative at the time. As a result, service vehicular access for the ASB was not defined with any specificity. As currently proposed, the ASB would include an off-street service area with a driveway on the north side of 52nd Street about 120 feet east of Dover Street at the same location where an informal and temporary curb-cut is currently used to access temporary parking under the freeway. The driveway would be used by delivery and trash collection trucks only to access the ASB. Passenger vehicles are not expected to use this driveway. The service area would include a hammerhead turnaround which would allow the garbage and delivery trucks accessing the ASB to make a three-point turn within the service area. Thus, trucks would be able to turn-in and turn-out headfirst when entering and exiting the service area for the ASB. This would be safer than delivery and garbage trucks backing out of the service driveway onto 52nd Street, or delivery trucks using on-street parking to make deliveries. Trucks turning into and out of the driveway would have adequate sight distance of pedestrians on the adjacent sidewalk and of motor vehicles and bicycles traveling in both directions on 52nd Street. Thus, the proposed driveway and service area would not result in any new transportation impacts or substantially more severe significant transportation impacts as compared to those analyzed in the CMP Project EIR (Fehr & Peers 2022).

Parking. Parking impacts are no longer considered an environmental impact under CEQA. Therefore, any changes to parking demand or supply due to the ASB Project are not a concern under CEQA. The changes to parking are discussed below only for informational purposes. The ASB Project would decrease the overall off-street parking supply at the BCH Oakland campus by up to six spaces due to the elimination of ten (10) existing parking spaces as part of the demolition of the existing buildings and addition of four (4) parking spaces at the relocated buildings at 665 53rd Street. The project would also result in one net new on-street parking space due to the elimination of an existing driveway on Dover Street. However, the parking demand at the BCH Oakland campus is well below the supply at this time, and the eliminated parking spaces are less than one percent of the overall parking supply at the BCH Oakland campus. Furthermore, since the project would not increase the overall population at BCH Oakland, it would not increase the parking demand at the BCH Oakland campus compared to existing conditions. Thus, the overall off-street parking conditions at the BCH Oakland campus would remain similar to current conditions and parking demand would continue to remain below the parking supply for the campus (Fehr & Peers 2022).

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe transportation impacts because the moves would be temporary, of limited duration, and would involve a small number of staff.

Evaluation of Potential New Information/Changed Circumstances

Consistent with industry standards and the City of Oakland requirements at the time, the CMP Project EIR used automobile delay or LOS as the primary metric to evaluate the project's transportation impacts. Since then, as directed by SB 743, changes to the *CEQA Guidelines* were adopted in December 2018. According to the updated guidelines, as of July 1, 2020, CEQA documents must evaluate transportation impacts based on VMT. Automobile delay, as measured by "level of service" and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA (Public Resources Code, Section 21099, subd. (b)(2)).

The CMP Project EIR was certified several years before the *CEQA Guidelines* were amended to add VMT as the primary measure of transportation impacts. According to *CEQA Guidelines* Section 15007, "amendments to the guidelines apply prospectively only," and "new requirements in amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply with the amendments." The Guidelines section also states that CEQA documents must meet the "content requirements in effect when the document was set out for public review," and "shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved." As the CMP Project EIR was prepared consistent with the content requirements in 2015 and the EIR was certified before the new requirement became effective, the CMP Project EIR does not need to be revised to address the new VMT requirements.

Furthermore, as discussed in Section II above, all of the employees who would occupy the relocated buildings and the new ASB are existing employees who would relocate into these buildings from other existing buildings on the campus. Further, the ASB Project components would not serve patients and visitors. Therefore, implementation of the ASB Project would not cause the campus population to increase. Consequently, the ASB Project would not result in an increase in daily vehicle trips to and from the campus and there would be no increase in VMT compared to existing conditions. Because the ASB Project will not result in any such increase, and thus will not result in any new significant or substantially more severe impact as compared to the analysis in the CMP Project EIR, the ASB Project would not constitute new information of substantial importance.

Conclusion

The ASB Project would not result in new or substantially more severe significant impacts on transportation than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.5 AIR QUALITY

Section E in Chapter IV of the CMP Project EIR analyzed air quality impacts that could result from the implementation of the BCH Oakland CMP, including whether the project would have a significant impact on the environment related to air quality if it would:

- (1) During project construction result in average daily emissions of criteria pollutants in excess of significance thresholds provided by the BAAQMD;
- (2) During project operation result in average daily or maximum annual emissions of criteria pollutants in excess of significance thresholds provided by the BAAQMD;

- (3) Contribute to carbon monoxide (CO) concentrations exceeding the California Ambient Air Quality Standards (CAAQS) of nine parts per million (ppm) averaged over eight hours and 20 ppm for one hour;
- (4) For new sources of Toxic Air Contaminants (TACs), during either project construction or project operation, expose sensitive receptors to substantial levels of TACs under project conditions resulting in an increase in cancer risk or non-cancer health risk;
- (5) Expose new sensitive receptors to substantial ambient levels of TACs resulting in an increase in cancer risk or a non-cancer health risk; or
- (6) Frequently and for a substantial duration, create or expose sensitive receptors to substantial objectionable odors affecting a substantial number of people.

The impact analysis, which is presented on pages 382 to 400 of the CMP Project EIR, concluded that criteria pollutant and TAC emissions from CMP demolition and construction activities would not result in significant air quality and human health risk impacts. In addition, project construction would be subject to the City's SCAs, including SCA AIR-1 which would further reduce particulate matter and dust emissions. The analysis of the CMP's operational emissions at buildout showed that the CMP would not result in net new emissions that would exceed the significance thresholds for criteria pollutants and the project would not expose on-site and nearby receptors to excessive health risks, and the operational air quality impacts would be less than significant. The project's cumulative impacts were also found to be less than significant. No mitigation was required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the demolition, construction, and operational emissions would be the same as previously estimated (or potentially lower due to improved emissions controls, cleaner fuels, and elimination of natural gas usage from the new and relocated buildings) and the impacts on air quality would be the same as previously evaluated. The inclusion of the ASB service vehicle turnaround would result in a small increase in construction-phase emissions, but the increase would not be large enough to result in a significant air quality impact. This component would not increase the operational emissions as there would be no increase in vehicle traffic due to this improvement above the levels previously analyzed in the CMP Project EIR. The temporary relocation of staff would not involve any major modifications to the spaces that the staff would occupy temporarily; construction emissions from the minor interior patch, paint and IT equipment relocations would be minimal. The ASB Project would also implement all applicable SCAs to minimize operational and construction emissions. No new mitigation is required.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to air quality or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis. As noted on page 376 of the CMP Project EIR, the 2011 BAAQMD *CEQA Air Quality Guidelines* were challenged, and the case was pending before the California Supreme Court when the CMP Project EIR was prepared and certified in early 2015. Subsequently, in an opinion issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an analysis of the impacts of locating development in areas subject to environmental hazards unless the project would exacerbate existing environmental hazards. Following the Supreme Court ruling, the BAAQMD reinstated the guidelines. All of the thresholds of significance

and methodologies for analyzing air quality impacts in the reinstated guidelines are the same as the thresholds and methodologies used in the preparation of the CMP Project EIR.

Conclusion

The ASB Project would not result in new or substantially more severe significant impacts on air quality than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.6 GREENHOUSE GAS EMISSIONS

Section F in Chapter IV of the CMP Project EIR analyzed the impacts from greenhouse gas (GHG) emissions that could result from the implementation of the BCH Oakland CMP. The EIR analyzed whether the project would:

(1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, specifically:

- For a project involving a land use development, produce total emissions of more than 1,100 metric tons of CO₂e² annually AND more than 4.6 metric tons of CO₂e per service population annually;
- For a project involving a stationary source, produce total emissions of more than 10,000 metric tons of CO₂e annually.

(2) Conflict with an applicable plan, policy or regulation adopted for the purposes of reducing GHG emissions.

The impact analysis, which is presented on pages 425 to 432 of the CMP Project EIR, noted that the CMP would involve the demolition of existing buildings and construction of new more energy efficient buildings. While a substantial amount of new space would be built on the site, only a small number of new employees would be added to the BCH Oakland campus. As a result of the small increase in population, the replacement of old building space with energy-efficient space, as well as use of cleaner electricity in future years, buildout of the CMP would result in lower GHG emissions than the existing/baseline emissions estimated for the BCH Oakland campus in 2014. The analysis also calculated the change in per capita emissions and found that with the implementation of the CMP, the campus site's per capita emissions would exceed the threshold of 4.6 metric tons of CO₂e per service population. Although the per capita threshold would be exceeded, because the total emissions would be lower than existing total emissions, the EIR concluded that the impact would be less than significant. Similarly, with respect to GHG emissions from stationary sources, the EIR found that the emissions from new stationary sources added to the campus site under the CMP would be lower than the stationary source threshold set forth above. The CMP Project EIR also concluded that the proposed project would not conflict with any applicable plans, policies or regulations adopted with the intent to reduce GHG emissions. All of the GHG impacts were determined to be less than significant. No mitigation was required.

Project Consistency

² CO₂e – carbon dioxide equivalent. Because of the differential heat absorption potential of various GHGs, GHGs are typically measured and reported in terms of pounds or tons of “carbon dioxide-equivalent.”

The components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP. Therefore, the impact related to GHG emissions from construction activities remains substantially unchanged.

With respect to ASB Project operations, as discussed in Section II above, all of the employees who would occupy the two relocated buildings and the new ASB are existing employees who would relocate into these buildings from other existing buildings on the campus. Furthermore, the ASB Project facilities would not serve patients and visitors. Therefore, implementation of the ASB Project would not cause the campus population to increase, nor would it result in an increase in daily vehicle trips and transportation-related GHG emissions. Further, the new ASB and the relocated structures would be more energy efficient than the existing spaces occupied by the relocating employees, and the ASB and relocated structures would be fully electric buildings with no natural gas infrastructure. Therefore, there would likely be a decrease in GHG emissions compared to baseline conditions and compared to the estimated emissions in the CMP EIR. In addition, the electricity-usage related GHG emissions from the relocated buildings and ASB would likely be lower than previously estimated. This is because, although the CMP Project EIR acknowledged and accounted for reduction in emissions from electricity generation due to Renewable Portfolio regulations required under AB 32, the verified 2020 carbon dioxide emission rate for PG&E's delivered electricity is much lower than the rate used in the CMP Project EIR. As the GHG emissions associated with the ASB Project would be unchanged or likely be lower than previously estimated, the impact would remain less than significant. The inclusion of the ASB service vehicle turnaround would result in a small increase in construction-phase GHG emissions, but the increase would not be large enough to result in a significant GHG impact. This component would not increase the operational GHG emissions as there would be no increase in vehicle traffic due to this improvement above the levels previously analyzed in the CMP Project EIR. The temporary relocation of staff would not involve any major modifications to the spaces that the staff would occupy temporarily; construction emissions from the minor interior patch, paint and IT equipment relocations would be small. The ASB Project would also implement applicable SCAs to minimize operational GHG emissions. No new mitigation would be required.

Evaluation of Potential New Information/Changed Circumstances

There are no changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis. As noted on page 414 of the CMP Project EIR, the BAAQMD 2011 *CEQA Air Quality Guidelines* were challenged. Subsequently, all of the thresholds were upheld and, following the December 17, 2015 California Supreme Court ruling, the BAAQMD reinstated the guidelines. All of the thresholds of significance and methodologies for analyzing GHG impacts used in the preparation of the CMP Project EIR are the same as the thresholds and methodologies in the reinstated guidelines.

BAAQMD Updated CEQA Thresholds for GHG Impacts. Since the certification of the CMP Project EIR, on April 20, 2022, the BAAQMD issued updated GHG emissions thresholds that may be used by Bay Area lead agencies to evaluate the GHG impacts of a proposed project or plan. The new thresholds are designed to control GHG emissions from new development and achieve the reductions needed to bring the Bay Area into compliance with the latest State laws. The BAAQMD guidance notes that the new thresholds should be used for projects for which an EIR Notice of Preparation (NOP) is issued after April 20, 2022. Based on the analysis in this assessment, the ASB Project would not result in new or substantially more severe significant environmental impacts than previously disclosed and an EIR is not required. As no NOP is required and because the proposed project would not increase GHG emissions compared to existing conditions (and would likely decrease GHG emissions), the new thresholds are not applicable to the ASB Project. Nonetheless, the ASB Project was examined relative to the new thresholds to determine whether the project could result in a significant impact related to its GHG emissions.

In its *Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans*, for land use development projects, the Air District recommends evaluating a project based on its effect on California’s efforts to meet the State’s long-term climate goals. A project that would be consistent with meeting those goals can be found to have a less-than-significant impact on climate change under CEQA. If a project would contribute its “fair share” of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (BAAQMD 2022). The BAAQMD notes that a new land use development project being built today needs to incorporate the following design elements to do its “fair share” of implementing the goal of carbon neutrality by 2045:

A. Projects must include, at a minimum, the following project design elements:

1. Buildings

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *CEQA Guidelines*.

2. Transportation

- a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
- b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

For reasons set forth below, the ASB Project will not conflict with design elements identified above.

- The two relocated buildings and ASB will be fully electric buildings with no natural gas appliances or natural gas infrastructure.
- Section K, Utilities in the CMP Project EIR included an analysis of the impacts of the CMP on energy resources and infrastructure. The EIR concluded that the energy impacts would be less than significant. The ASB will be designed and constructed to comply with the UC Sustainable Practices Policy (Sustainability Policy). For the ASB, sustainability targets and goals include Leadership in Energy and Environmental Design (LEED) minimum building certification level of Gold under the LEED Green Building Rating System, with incentives for Platinum. The ASB would outperform the California Energy Code by 20 percent or better as required by Sustainability Policy or would meet UC’s Whole Building Energy Performance Targets. As a result, the ASB Project would not result in wasteful, inefficient or unnecessary use of energy.
- The ASB Project would not increase campus employee, patient or visitor population compared to existing/baseline conditions. Nor would the project involve an increase in parking (in fact there would be a small reduction in the number of parking spaces due to the project). As a result, there would be no increase in vehicle trips or VMT due to the ASB Project. Therefore, the transportation-related design elements listed above related to VMT and electric vehicle charging facilities do not apply to the proposed project.

Conclusion

The ASB Project would not result in new or substantially more severe significant impacts due to GHG emissions than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.7 NOISE

Section G in Chapter IV of the CMP Project EIR analyzed the noise and vibration impacts that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Generate noise in violation of the City of Oakland Noise Ordinance (Oakland Planning Code section 17.120.050, regarding stationary operational noise;
- (2) Expose the project to community noise in conflict with the land use compatibility guidelines of the Oakland General Plan after incorporation of all applicable Standard Conditions of Approval;
- (3) Expose persons to or generate noise levels in excess of applicable standards established by a regulatory agency (e.g., occupational noise standards of the Occupational Safety and Health Administration [OSHA]);
- (4) Generate noise in violation of the City of Oakland Noise Ordinance (Oakland Planning Code section 17.120.050) regarding construction noise, except if an acoustical analysis is performed that identifies recommended measures to reduce potential impacts;
- (5) Exceed the applicable nighttime operational noise level standard during the hours of 7:00 p.m. to 7:00 a.m. on weekdays and 8:00 p.m. to 9:00 a.m. on weekends and federal holidays, as received by any land use from construction or demolition;
- (6) Generate noise in violation of the City of Oakland nuisance standards (Oakland Municipal Code section 8.18.020) regarding persistent construction-related noise;
- (7) Generate or expose persons to groundborne vibration during either project construction or operation that exceeds the criteria (shown in Table IV.G-14) established by the Federal Transit Administration (FTA);
- (8) Expose persons to interior Ldn or CNEL greater than 45 dBA for multi-family dwellings, hotels, motels, dormitories, and long-term care facilities (and may be extended by local legislative action to include single-family dwellings) per California Noise Insulation Standards (CCR Part 2, Title 24);
- (9) Generate noise resulting in a 5 dBA permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or, if under a cumulative scenario where the cumulative increase results in a 5 dBA permanent increase in ambient noise levels in the project vicinity without the project (i.e., the cumulative condition including the project compared to the existing conditions) and a 3 dBA permanent increase is attributable to the project (i.e., the cumulative condition including the project compared to the cumulative baseline condition without the project);
- (10) Be located within an airport land use plan and would expose people residing or working in the project area to excessive noise levels; or

(11) Be located within the vicinity of a private airstrip and would expose people residing or working in the project area to excessive noise levels.

The impact analysis, which is presented on pages 453 to 479 of the CMP Project EIR, concluded that all of the CMP Project's noise and vibration impacts, both during project construction and occupancy/operations (including vehicular traffic noise), would either be less than significant or would be less than significant with the implementation of SCAs. The project's cumulative impacts would also be less than significant. No mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the noise and vibration impacts remain unchanged. The ASB Project would also implement all applicable SCAs to control operational and construction noise in compliance with the City's Noise Ordinance and Planning Code.

ASB Setbacks. With the corrected setbacks, ASB construction on Dover Street frontage would be closer to the residential receptor located across the street from the planned building. However, with the implementation of the applicable SCAs, construction noise levels would comply with the City's Noise Ordinance and the impact would remain less than significant. No new mitigation would be required.

ASB Service Access & Turnaround. Although the ASB service area and turnaround was not specifically identified in the CMP, the site of the turnaround is underneath the 52nd Street freeway on-ramp and not adjacent to any sensitive land uses. The inclusion of the turnaround in the ASB project and its use by waste hauling and delivery vehicles would not result in any new or substantially more severe significant traffic noise impacts than previously analyzed and disclosed in the CMP Project EIR.

PG&E Transformer. The transformer would be located in a tamper-proof cabinet to the north of the ASB and at least 24 feet east of Dover Street. Furthermore, the unit would not generate any noise or vibrations that could affect nearby receptors. The placement of the transformer outside the ASB would not result in new or substantially more severe significant noise and vibration impacts.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe noise impacts because no exterior changes to the buildings are proposed, and the minor interior work would not generate noise levels that would result in a new noise impact.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to noise and vibration or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant noise and vibration impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.8 GEOLOGY AND SOILS

Section H in Chapter IV of the CMP Project EIR analyzed impacts related to geology and soils that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Expose people or structures to substantial risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or Seismic Hazards Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to California Geological Survey 42 and 117 and PRC §2690 et. seq.);
 - Strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction, lateral spreading, subsidence, collapse; or
 - Landslides;
- (2) Result in substantial soil erosion or loss of topsoil, creating substantial risks to life, property, or creeks/waterways;
- (3) Be located on expansive soil, as defined in §1802.3.2 of the California Building Code (2007, as it may be revised), creating substantial risks to life or property;
- (4) Be located above a well, pit, swamp, mound, tank vault, or unmarked sewer line, creating substantial risks to life or property;
- (5) Be located above landfills for which there is no approved closure and post-closure plan, or unknown fill soils, creating substantial risks to life or property; or
- (6) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The impact analysis, which is presented on pages 495 to 499 of the CMP Project EIR, concluded that all of the CMP Project's geology and soil impacts would either be less than significant or would be less than significant with the implementation of the City's SCAs. The project's cumulative impacts would also be less than significant. No mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the geology and soil impacts remain unchanged. As the site is already leveled in conjunction with previous development, the construction of the ASB service vehicle turnaround would not involve any substantial grading, and therefore would not result in geology and soils impacts. The temporary relocation of staff would not involve any changes to the exterior of the buildings or any ground disturbance. The ASB Project would also implement all applicable SCAs to avoid or minimize significant geology and soil impacts.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to geology and soils or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant geology and soils impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.9 HYDROLOGY AND WATER QUALITY

Section I in Chapter IV of the CMP Project EIR analyzed impacts related to hydrology and water quality that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Violate any water quality standards or waste discharge requirements;
- (2) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or proposed uses for which permits have been granted);
- (3) Result in substantial erosion or siltation on- or off-site that would affect the quality of receiving waters;
- (4) Result in substantial flooding on- or off-site;
- (5) Create or contribute substantial runoff which would exceed the capacity of existing or planned stormwater drainage systems;
- (6) Create or contribute substantial runoff which would be an additional source of polluted runoff;
- (7) Otherwise substantially degrade water quality;
- (8) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, that would impede or redirect flood flows;
- (9) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- (10) Expose people or structures to a substantial risk of loss, injury or death involving flooding;
- (11) Expose people or structures to a substantial risk of loss, injury or death as a result of inundation by seiche, tsunami, or mudflow;
- (12) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course, or increasing the rate or amount of flow, of a Creek, river or stream in a manner that would result in substantial erosion, siltation, or flooding, both on or off-site; or
- (13) Fundamentally conflict with elements of the City of Oakland Creek Protection (OMC Chapter 13.16) ordinance intended to protect hydrologic resources.

The impact analysis, which is presented on pages 511 to 518 of the CMP Project EIR, concluded that all of the CMP Project's hydrology and water quality impacts would either be less than significant or would be less than significant with the implementation of the City's SCAs. The project's cumulative impacts would also be less than significant. No mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the hydrology and water quality impacts would remain unchanged.

ASB Service Access & Turnaround. Although the ASB service area and turnaround was not specifically identified in the CMP, the site of the turnaround is underneath the 52nd Street freeway on-ramp and is currently used informally to access parking under the on-ramp. The turnaround is approximately 2,140 square feet in area, and although the area is currently not paved, it comprises compacted dirt with loose rock on top, and consequently has limited permeability. Therefore, the addition of the turnaround would not substantially increase the amount of impervious surfaces added to the BCH Oakland campus under the CMP and would not generate a substantially greater amount of new runoff than previously projected under the CMP. Further, once leased and included in the BCH Oakland campus, the turnaround area would be regularly maintained and kept free of trash and other urban pollutants that could affect storm water quality. As with the rest of the ASB Project site, runoff generated in this area would be directed to bioswales for treatment before discharge into the storm drain system. The inclusion of the turnaround in the ASB Project would not result in any new or substantially more severe significant hydrology and water quality impacts.

PG&E Transformer. The transformer would be located in a tamper-proof cabinet on a small concrete pad. No urban runoff pollutants would be associated with the transformer. The placement of the transformer outside the ASB would not result in new or substantially more severe significant hydrology and water quality impacts.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe hydrology and water quality impacts because only minor interior work is proposed.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to hydrology and water quality or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant hydrology and water quality impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.10 HAZARDS AND HAZARDOUS MATERIALS

Section J in Chapter IV of the CMP Project EIR analyzed impacts related to hazards and hazardous materials that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;

- (3) Create a significant hazard to the public through the storage or use of acutely hazardous materials near sensitive receptors;
- (4) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- (5) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., the “Cortese List”) and, as a result, would create a significant hazard to the public or the environment;
- (6) Result in less than two emergency access routes for streets exceeding 600 feet in length unless otherwise determined to be acceptable by the Fire Chief, or his/her designee, in specific instances due to climatic, geographic, topographic, or other conditions;
- (7) Fundamentally impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- (8) Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and would result in a significant safety hazard for people residing or working in the project area;
- (9) Be located within the vicinity of a private airstrip, and would result in a significant safety hazard for people residing or working in the project area; or
- (10) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

The impact analysis, which is presented on pages 530 to 535 of the CMP Project EIR, concluded that all of the CMP Project’s hazards and hazardous materials impacts, including impacts from potential exposure to asbestos, lead-based paint, PCB and other hazardous materials present in existing structures to be demolished, would either be less than significant or would be less than significant with the implementation of the City’s SCAs, including SCA HAZ-4, HAZ-6 and HAZ-8. The project’s cumulative impacts would also be less than significant. No mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, all of the hazards and hazardous materials impacts would remain unchanged.

ASB Service Access & Turnaround. As noted above, the site of the turnaround is underneath the 52nd Street freeway on-ramp and is currently used informally to access parking under the on-ramp. Due to its location adjacent to the freeway and on-ramp, exposure to aerially deposited lead would be a potential concern during the construction of the turnaround. However, potential impact from exposure to aerially deposited lead in areas adjacent to the freeway was evaluated in the CMP EIR and was found to be less than significant with the implementation of the City’s SCAs. The ASB Project would also comply with and implement all applicable SCAs. The inclusion of the turnaround in the ASB Project would not result in any new or substantially more severe significant hazards and hazardous materials impacts.

PG&E Transformer. The transformer would be located in a tamper-proof cabinet on a small concrete pad about 9 feet north of the ASB and about 24 feet east of Dover Street curb. It would be located away from public right of way and sidewalks. To minimize electrical hazard, the unit would be secured and labeled with warning signs. The placement of the transformer outside the ASB would not result in new or substantially more severe significant hazards and hazardous material impacts.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe hazards and hazardous materials impacts because only minor interior work is proposed.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to hazards or hazardous materials or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Conclusion

The ASB Project would not result in new or substantially more severe significant hazards or hazardous materials impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.11 UTILITIES

Section K in Chapter IV of the CMP Project EIR analyzed impacts on major utilities and infrastructure, including water, wastewater, stormwater, solid waste, and energy that could result from the implementation of the BCH Oakland CMP, including whether the project would:

- (1) Exceed water supplies available to serve the project from existing entitlements and resources, and require or result in construction of water facilities or expansion of existing facilities, construction of which could cause significant environmental effects;
- (2) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the providers' existing commitments and require or result in construction of new wastewater treatment facilities or expansion of existing facilities, construction of which could cause significant environmental effects;
- (3) Exceed wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board;
- (4) Require or result in construction of new storm water drainage facilities or expansion of existing facilities, construction of which could cause significant environmental effects;
- (5) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs and require or result in construction of landfill facilities or expansion of existing facilities, construction of which could cause significant environmental effects;
- (6) Violate applicable federal, State, and local statutes and regulations related to solid waste;
- (7) Result in a determination by the energy provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the providers' existing

commitments and require or result in construction of new energy facilities or expansion of existing facilities, construction of which could cause significant environmental effects; or

(8) Violate applicable federal, State and local statutes and regulations relating to energy standards.

The impact analysis, which is presented on pages 551 to 561 of the CMP Project EIR, concluded that all of the CMP Project's utility demand and infrastructure impacts would either be less than significant or would be less than significant with the implementation of the City's SCAs. The project's cumulative impacts would also be less than significant. No mitigation would be required.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, the utility demand and infrastructure impacts would remain unchanged.

Furthermore, as discussed in Section II above, all of the employees who would occupy the relocated buildings and the new ASB are existing employees who would relocate into these buildings from other existing buildings on the campus, and the ASB Project components would not serve patients and visitors. Therefore, implementation of the ASB Project would not cause the campus population to increase compared to existing conditions. Consequently, the ASB Project would not result in an increase in demand for utilities, including water and wastewater. In fact, due to high efficiency water and wastewater fixtures as well as better energy efficiency in the ASB and the relocated buildings compared to existing spaces occupied by these employees, the utility demand would likely be lower than under existing conditions. The ASB Project would not result in new or substantially more severe significant utility impacts than previously analyzed. Further, the ASB Project would also comply with and implement all applicable City SCAs.

PG&E Transformer. The CMP anticipated the need for a transformer for the new building, and Condition of Approval #49 stipulated that the transformer be located inside the building. Therefore, the transformer is not a new utility improvement that has been added to the ASB Project; only its proposed location is changed from the location set forth in the condition of approval. As discussed in the preceding sections of this assessment, the location of the transformer outside the ASB would not result in new or substantially more severe significant environmental impacts and no new mitigation would be required.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe utility impacts because only minor interior work is proposed.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to major utilities or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

The impact of the CMP on water supply was analyzed in the CMP Project EIR based on a Water Supply Assessment (WSA) prepared for the project by East Bay Municipal Utility District (EBMUD). The WSA estimated that increased water demand from the buildout of the BCH Oakland campus under the CMP and concluded that the anticipated daily water demand that would result from the buildout was accounted for in EBMUD's water demand projections as published in EBMUD's 2010 Urban Water Management Plan. In compliance with state law, EBMUD's UWMP is updated every five years. The latest 2020 UWMP, which was adopted in June 2021, assesses water supplies against expected water demands for a 30-year planning horizon (2020 through 2050). As the water demand associated with the CMP was

accounted for in the 2010 UWMP, it is reasonable to assume that it is also accounted for in the 2020 UWMP demand projections, which estimates increases in water demand based on the number of accounts and provides for a 53 percent increase in water demand associated with institutional customers such as UCSF BCH Oakland. The 2020 UWMP concluded that EBMUD can meet customer demand out to 2050 during normal years and single dry years. However, during multi-year droughts, even with customer demand reduction measures in place, EBMUD will need to obtain supplemental supplies to meet customer demands (EBMUD 2021). As noted above, the ASB Project would not result in an increase in water demand at the BCH Oakland campus and could potentially reduce the demand compared to existing conditions. Therefore, the ASB Project is accounted for in EBMUD's water planning efforts and would not result in a new or substantially more severe significant water supply impact than previously disclosed in the CMP Project EIR.

Conclusion

The ASB Project would not result in new or substantially more severe significant utility impacts than those evaluated in the CMP Project EIR, and no new mitigation would be required.

4.12 OTHER RESOURCES

Section D in Chapter VI of the CMP Project EIR analyzed the potential effects of the CMP on other resources, namely Agricultural and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, Public Services, and Recreation, and found all impacts to be less than significant or in the case of biological resources less than significant with the implementation of the City's SCAs.

Project Consistency

As the components of the ASB Project (the buildings to be demolished, the two buildings to be relocated, and the new ASB to be constructed) are essentially the same as the equivalent components in the CMP, impacts on other resources, including Agricultural and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, Public Services, and Recreation, would remain unchanged. The CMP Project EIR noted that about 90 protected trees would be removed in conjunction with the implementation of Phase 2 of the CMP. The ASB Project would require the removal of six (6) protected trees and involve construction within 10 feet of another three (3) protected trees. As the number of affected trees is within the previous estimate, the proposed project would not result in a new or substantially more severe significant impact on protected trees than previously analyzed. Further, the ASB Project would also comply with and implement all applicable City SCAs.

ASB Service Access & Turnaround. The inclusion of the small area associated with the turnaround in the ASB Project site would not change the previously analyzed impacts on Agricultural and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, Public Services, and Recreation. The turnaround area is disturbed due to informal use by vehicles to access parking in the area and does not contain any trees or other biological resources that would be affected.

PG&E Transformer. The placement of the transformer outside and to the north of the ASB would not affect any of the other resources, and its installation would not affect any existing trees as none are present at the proposed location of the transformer.

Temporary Relocations. The proposed temporary use of BCH-owned and leased spaces would not result in new or more severe impacts on other resources because only minor interior work is proposed.

Evaluation of Potential New Information/Changed Circumstances

There is no new information related to other resources or any changes in circumstances at or around the project site that could affect the conclusions of the prior impact analysis.

Since the certification of the 2015 CMP Project EIR, *CEQA Guidelines* Appendix G containing the CEQA checklist has been updated to include additional environmental topics for evaluation in CEQA documents. These new topics include Tribal Cultural Resources and Wildfire. According to *CEQA Guidelines* Section 15007, “amendments to the guidelines apply prospectively only,” and “new requirements in amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply with the amendments.” The Guidelines section also states that CEQA documents must meet the “content requirements in effect when the document was set out for public review,” and “shall not need to be revised to conform to any new content requirements in guideline amendments taking effect before the document is finally approved.” As the CMP Project EIR was prepared consistent with the content requirements in early 2015 and the EIR was certified before these changes were made to the checklist, the CMP Project EIR does not need to be revised to address the new requirements related to wildfire or tribal cultural resources. Furthermore, wildfire is not an issue for the project as it is not located near open space or in an area with high wildfire hazard. Regarding analysis of impacts on tribal cultural resources pursuant to AB 52, OPR noted that projects approved after July 1, 2015 would need to comply with the requirements of AB 52. The CMP Project EIR was certified before that date and the CMP was approved at that time. AB 52 also stipulates that tribal consultation be conducted if an EIR or a Mitigated Negative Declaration is being prepared. The analysis in this Addendum shows that the ASB Project is adequately analyzed in the CMP Project EIR and that no new CEQA documentation is required. For that reason, AB 52 consultation regarding tribal cultural resources is not required.

Conclusion

The ASB Project would not result in new or substantially more severe significant impacts on other resources than those evaluated in the CMP Project EIR, and no new mitigation would be required.

5. SUMMARY

As the ASB Project components are substantially the same as the equivalent components in the approved CMP and the new or revised elements, such as the ASB service vehicle turnaround, the installation of the PG&E transformer outside the ASB, and temporary relocation of staff, would not result in new significant impacts, the analysis demonstrates that the project is adequately analyzed in the previously certified CMP Project EIR. While there are some changes in the circumstances in which the project will be undertaken, there would be no new or substantially more severe environmental impacts from project implementation, and no new mitigation would be required. None of the conditions set forth in Public Resources Code Section 21166 or CEQA Guidelines Section 15162 requiring the preparation of a subsequent document have been met. Therefore, no further CEQA documentation is required.

V. REFERENCES

ARG. 2022. Phase 2 Final Development Plan. Memorandum presenting Historic Impacts Analysis dated September 27, 2022.

BAAQMD. 2022. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans.

City of Oakland. 2015. Children's Hospital and Research Center Oakland Campus Master Plan Project Final Environmental Impact Report. SCH No. 2013072058. February 2015.

City of Oakland. 2021. Oakland 2030 Equitable Climate Action Plan.

EBMUD. 2021. East Bay Municipal Utility District Urban Water Management Plan 2020. Adopted June 2021.

Fehr & Peers. 2022. UCSF Benioff Children's Hospital Oakland, Campus Master Plan Project Phase 2 - Transportation and Parking Memorandum. Dated August 16, 2022.