



## REVISED NOTICE OF PREPARATION

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DATE:	January 29, 2020
TO:	Responsible Agencies, Trustee Agencies, and Other Interested Parties
FROM:	City of Redwood City, Lead Agency
APPLICANT:	Greystar Development
SUBJECT:	Revised Notice of Preparation and a Scoping Meeting for a Draft Environmental Impact Report for the Proposed South Main Mixed-Use Project

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The City of Redwood City (City) is considering the proposed South Main Mixed-Use Project and determined that an Environmental Impact Report (EIR) will be necessary to evaluate environmental impacts of the project, per the California Environmental Quality Act (CEQA). In compliance with CEQA, the City will be the Lead Agency and will prepare the EIR.

On July 9, 2019, a [Notice of Preparation \(NOP\)](#) and supporting Initial Study were circulated for a 30-day public review period. The NOP reflected a proposal from the applicant, Greystar LLC, to develop a project with 291 residential units and approximately 587,000 square feet of office and commercial space. Based on comments received during the NOP process, including the NOP public hearing on July 30, 2019, the applicant has revised the proposed project to add 249 housing units and reduce the office space by 19,000 square feet.

This revised NOP is being circulated to describe the changes to the proposed project and thereby update the public and public agencies. Information that follows includes a description of the currently proposed project, locations maps, and preliminary identification of the potential environmental issues to be addressed in the EIR. No revisions to the prior Initial Study circulated with the July 2019 NOP have been identified, but if necessary will be addressed during preparation of the EIR. The revised project plans and prior Initial Study are available for review online at:

[www.redwoodcity.org/developmentprojects](http://www.redwoodcity.org/developmentprojects)

In consideration of the revised project described below, the City is requesting comments and guidance on the scope and content of the EIR from responsible and trustee agencies, interested public agencies, organizations, and the general public (CEQA Guidelines 15082). If your agency is a responsible agency as defined by Section 15381 of the CEQA Guidelines, your agency may use the environmental documents prepared by the City when considering permits or approvals for action regarding the project.

**Public Review Period: January 29, 2020 to February 28, 2020.** The City requests review and consideration of this revised NOP, and invites comments regarding the preparation of the EIR. Comments and responses to this notice must be in writing and submitted by the close of business on the last day of the comment period. Please provide a contact name, phone number and email address with your comments. All comments must be sent to:

City of Redwood City, Planning Services  
Attention: Lindy Chan, Acting Planning Manager  
1017 Middlefield Road, Redwood City, CA 94063  
(650) 780-7237 | [Lchan@redwoodcity.org](mailto:Lchan@redwoodcity.org)

The public Scoping Meeting on the Draft Environmental Impact Report for the proposed project will be held on **February 18, 2020 at 7:00 pm** at the City of Redwood City, City Hall Council Chamber.

A handwritten signature in blue ink that reads "Lindy Chan".

Lindy Chan, Acting Planning Manager, City of Redwood City

A handwritten date in blue ink that reads "1/28/2020".

Date



## Revised Notice of Preparation for an Environmental Impact Report for the City of Redwood City South Main Mixed-Use Project

Date of Distribution: January 29, 2020

### Project Title and Applicant

South Main Mixed-Use Project by Greystar Development

### Project Location

No change is proposed to the project location described in the [July 2019 NOP](#). The project site is located at the periphery of the City's Downtown core and is composed of five contiguous blocks totaling 8.30 acres (Parcels A through E) and one separate block of approximately 0.15 acre (Parcel F), as shown in Figure 1. Parcels A through E are bounded by El Camino Real, Maple Street, Elm Street, Main Street, Caltrain right-of-way, Chestnut Street, Shasta Street, and Cedar Street. Parcel F is approximately 1,000 feet northwest of Parcels A through E at the southwest corner of El Camino Real and Jackson Avenue. Lathrop Street and Main Street run through Parcels A through E in a north-south direction and Beech Street and Cedar Street in an east-west direction.

### Project Description

Revisions to the proposed project previously described in the July 9, 2019 NOP are summarized as follows:

- Addition of 249 residential units
- Reduction in office space by 19,000 square feet
- Reduction of off-street parking by 182 spaces (no change to on-street parking)

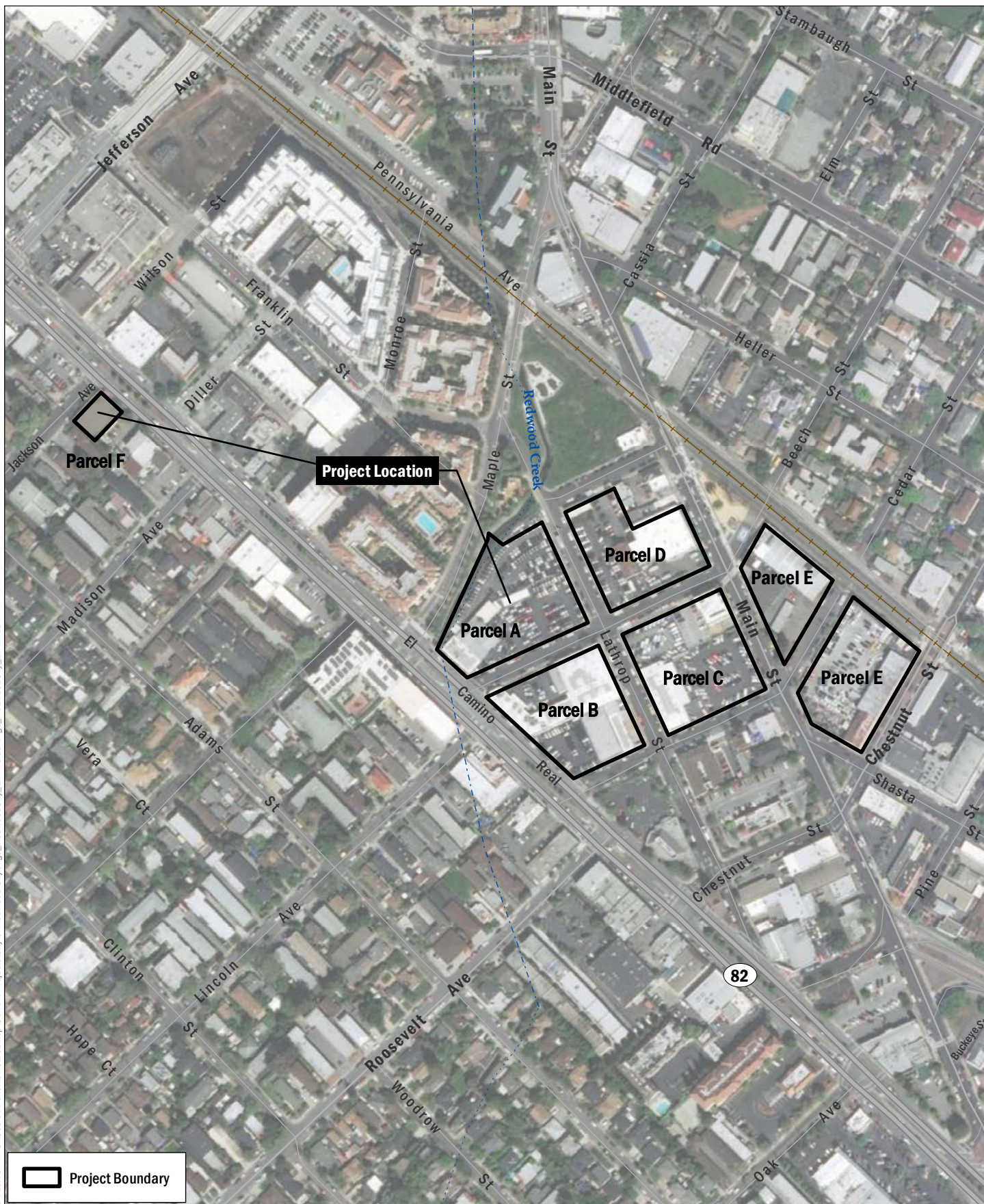
The proposed project would include one building each on Parcel A, D and F, developed with primarily residential uses; and four additional buildings on Parcels B, C and E, where the primary use would be commercial office space. Parcel E contains two buildings. Figure 2 shows the proposed building footprint and open space for Parcels A through F.

The proposed project as revised would develop 540 multifamily residential units, including 252 units on Parcel A, 249 units of Parcel D, and 39 units on Parcel F. The project would also include approximately 530,000 square feet of office uses, an 8,400-square-foot childcare facility (not including 5,800 square feet of dedicated outdoor space), and 29,000 square feet of retail uses, including 19,000 square feet of ground-floor space on Parcel B designed to accommodate retail/entertainment uses. The approximately 40,000 square feet of public open space proposed throughout the site would include a public creek walk and a park at Shasta Street and Chestnut Street. The following general land uses would be constructed at each parcel:

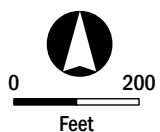
- **Parcel A** – multifamily residential uses and retail space, and public and private open space.
- **Parcel B** – retail and office space, along with a childcare facility, family-oriented entertainment/retail.
- **Parcel C** – office space, and private open space.
- **Parcel D** – multifamily residential uses and private open space.
- **Parcel E** – office space, retail, and public and private open space.
- **Parcel F** – multifamily residential uses and private open space.



04/25/19 h:\C:\Users\hroko.kolke\Desktop\Current Projects\City of Redwood City\Figs\_RedwoodCity\_EIR\_Folder\Figs\_RedwoodCity\_EIR.indd



Data Source: ESRI, 2019.



## PROJECT SITE

South Main Mixed-Use Development Project  
City of Redwood City, California

FIGURE 1





Source: WRNS STUDIO, 2019.

## PROPOSED PROJECT SITE

South Main Mixed-Use Development Project  
City of Redwood City, California

FIGURE 2



## Required Approvals

*City of Redwood City Discretionary Approvals.* Project implementation would require the following discretionary approvals by the City of Redwood City:

- Use Permits
- Downtown Planned Community Permit
- Vesting Tentative Tract Map
- Abandonment of a segment of a public street (Shasta)
- Abandonment of a segment of a public street and conversion to a private street (Cedar)
- Site Development Permit
- Acquisition of a City-owned parcel (1306 Main Street)
- Affordable Housing Plan
- Architectural Permit
- Tree Removal Permit
- Grading Permit
- State Density Bonus concessions and waivers

Approval of the above-listed discretionary approvals will also require certification of the EIR and adoption of a Mitigation Monitoring Reporting Program (MMRP). The project will also require approval of a number of ministerial approvals such as demolition, excavation, shoring, grading, encroachment, and building permits

*Other Government Agency Approvals.* The project could require review and/or approval from the Regional Water Quality Control Board (RWQCB) for a General Construction Storm Water Permit that will require preparation of a Stormwater Pollution Prevention Plan, and an encroachment permit from Caltrans for construction work within El Camino Real and from Caltrain for work in the railway right-of-way. Proposed pedestrian improvements over Redwood Creek may require permits from the U.S. Army Corps of Engineers, RWQCB, and California Department of Fish and Wildlife.

## EIR Purpose

The purpose of an EIR is to inform decision-makers and the general public of the environmental impacts of a proposed project that an agency (in this case, the City of Redwood City) may implement or approve. The EIR process is intended to: (1) provide information sufficient to evaluate a project and its potential for significant impacts on the environment; (2) examine methods (e.g., project-specific mitigations, uniformly applied development regulations) for avoiding or reducing significant impacts; and (3) consider alternatives to the proposed project.

In accordance with CEQA, the EIR will include the following:

- A summary of the project, its potential significant environmental impacts, and mitigations required to avoid or reduce those significant impacts;
- A project description;
- A description of the existing environmental setting, potential environmental impacts, and mitigations for the project;
- Alternatives to the proposed project; and
- Other environmental consequences of the project, including:
  - growth-inducing effects
  - significant unavoidable impacts
  - irreversible environmental changes
  - cumulative impacts, and
  - effects found not to be significant.



## **EIR Scope**

The City of Redwood City has determined that the project will require preparation of an EIR pursuant to the CEQA. Based on the prior Initial Study, the following environmental topics will be evaluated in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Transportation

## **Alternatives**

The EIR will identify and compare a reasonable range of alternatives to the proposed project. Alternatives will be chosen based on their ability to avoid or reduce identified significant environmental impacts of the project while achieving most of the project objectives (CEQA Guidelines Section 15126.6).



**Subject:** FW: NOP Issues for 1601 El Camino

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**From:** Bob Wilson

**Sent:** Friday, February 28, 2020 4:53 PM

**To:** planning@redwoodcity.cor; CD-Lindy Chan <lchan@redwoodcity.org>

**Cc:** janet@janetborgens.org; Council-Ian Bain <ibain@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>

**Subject:** NOP Issues for 1601 El Camino

I have reviewed the materials for this project and attended the recent information meeting held this week and run by the developer. While they captured questions on the white tablet in the room I want to be sure the following items are addressed before this project is considered further:

1. Why not defer further consideration until the visioning process adopted by council for the downtown area is completed? This is one of the largest potential projects in that footprint and it seems reasonable to wait.
2. A recent Sierra Club letter regarding Sequoia Station showed there is a 20,000 shortage of housing units in our city if this and other projects move forward. The 540 unit addition to this project is dwarfed by the increased need for housing it will generate. At 530,000 sq feet and sing 150 sq ft per person, this project would mean adding 3500 units to our deficit. This is outrageous! The developer said he added housing due to changed zoning. Can that be explained further? He said he did not want to ask for a modification of zoning to do more housing. I am sure it would be considered favorably. They have only done housing in RWC before, so:
  1. Why not require ALL Housing on this project? It's their expertise and they seem open to it.
  2. What is the justification for more offices given our massive regional imbalance?
  3. IF offices are built, there is also a massive deficit in transportation and other infrastructure that would further overwhelm our city. Its simply not safe. Simply where is the infrastructure investment too support this poorly conceived project?
  4. what is the developer doing to mitigate our unsafe conditions as we have too many people and cars using our limited infrastructure already? (see below)
3. There are no significant improvements to transport infrastructure proposed. Why proceed if this is the case? 540 housing units and Over 3500 new workers will come into this unsafe and over-burdened area. It's again outrageous and needs to be justified or fixed BEFORE considering new offices.
4. There are no funded plans to improve either Woodside Road, the Woodside Road Interchange or the Whipple Caltrain Grade crossing. Again we already have unsafe conditions. These need to get fixed BEFORE this project is considered.
5. This project is walkable from Sequoia Station per the developer. The planner stated new capacity on Caltrain would increase by 2020. i question this. The new cars even if added have fewer riders. What is the real extra capacity added? Also, the current trains are over crowed and that excess should be deducted before adding new capacity in any calculation.
6. People are being killed at a regular rate at grade crossings? What are the RWC statistics for accidents and deaths at grade crossings. Caltrain has a vision for 2040 but how many of the 42 grade crossings they need to build are planned, approved and funded? This needs to be accounted for in this project.
7. What is the impact on our schools for this project?



8. When we have the big earthquake, how will we address all these new people who will need responders when the area is gridlocked?
9. What not wait for the Transit Visioning process to complete before doing further work on this effort?
10. El Camino is gridlocked during commute hours. So is our downtown. I see nothing that this project does but make it much worse? How can we even consider this project with this situation in place and again NOTHING SIGNIFICANT is being done with this project to fix these problems. It only makes them far worse!

I have many more concerns but the deadline is here for comments. Contact me to discuss further. There are many others who were at the meeting and could not attend who also are gravely concerned!

## CD-Lindy Chan

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**Subject:** FW: South Main Mixed Use, NOP  
**Attachments:** SouthMain\_LDIGR\_letter\_082019.pdf

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**From:** Sears, Laurel@DOT [mailto:Laurel.Sears@dot.ca.gov]  
**Sent:** Tuesday, February 11, 2020 11:54 AM  
**To:** CD-Lindy Chan <lchan@redwoodcity.org>  
**Cc:** Leong, Mark@DOT <Mark.Leong@dot.ca.gov>  
**Subject:** South Main Mixed Use, NOP

Hello Lindy Chan,

We've received the Redwood City's request for comments on the NOP for the South Main Mixed Use Project. In August, our office replied to the first version of this project. I am attaching a copy of that letter. This letter still represents our understanding of the project and our review of the project's possible effect on our state transportation network. Thank you for including us on your review and we request to be included in further project developments. If you have any questions or concerns, feel free to contact us.

Laurel Sears, MUP/ MS  
Associate Transportation Planner  
Local Development- Intergovernmental Review  
Caltrans, District 4 | 510-286-5614 | [laurel.sears@dot.ca.gov](mailto:laurel.sears@dot.ca.gov)



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

www.dot.ca.gov

*Making Conservation  
a California Way of Life.*

August 9, 2019

SCH: 2019070208

GTS# 04-SM-2019-00262

GTS ID: 16388

PM: SM-82-3.795

Lindy Chan, Senior Planner  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

**South Main Mixed-Used Development – Notice of Preparation (NOP)**

Dear Lindy Chan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mills Park Center. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' Strategic Management Plan 2015-2020 aims, in part, to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas emissions (GHG) in alignment with state goals and policies. Our comments are based on the July 9, 2019 NOP.

**Project Understanding**

The proposed project will provide mixed-use development on 6 blocks (8.3 acres) including 291 multifamily residential units (including 97 affordable units), 550,143 square feet of office, 27,737 square feet of retail, and an 8,563 square foot child care facility generally located between El Camino Real, Maple Street, Cedar Street and Main Street, within the Mixed-Use Corridor and Mixed-Use Live and Work zoning districts. An offsite development at 1304 El Camino Real would provide affordable housing associated with the development, which is within the Downtown Precise Plan area. The proposed project is adjacent to State Route 82.

**Traffic Operations**

1) With respect to the local and regional roadway system, please provide the following information for this project: trip generation, trip distribution, and trip assignment estimates.

2) There are three state roadway systems, which serve this project. These regional roadway systems are experiencing sustained congestion during AM peak and PM

peak hours.

In analyzing the impact of the project-generated trips on this sustained congestion, the project-generated trips should be added to the existing traffic volumes and the future scenario traffic volumes for the intersections and freeway ramps listed below.

- SR 82 El Camino Real & Jefferson Avenue intersection,
- SR 82 El Camino Real & Jackson Avenue intersection,
- SR 82 El Camino Real & Maple Street intersection,
- SR 84 Woodside Road on & off-ramp & Main Street/Pine Street intersection,
- SR 84 Woodside Road & Middlefield Road intersection,
- SR 84 Woodside Road & Broadway Avenue intersection,
- SR 84 Woodside Road & Veterans Boulevard intersection,
- US 101 & SR 84 Woodside Road on & off ramp Northbound & Southbound direction.

3) To avoid impacts such as on-ramp queues spilling back onto the city streets near state highway on-ramps, the project should provide on-ramp storage capacity evaluations.

4) The project should determine if there is adequate storage capacity available for the turning movements at the intersections and on the freeway off-ramps listed above, to determine if the queues spill back onto the freeway mainline. In conducting these evaluations, it is necessary to use demand volumes rather than output volumes or constrained flow volumes.

5) To avoid traffic conflicts such as inadequate weaving distances, queues spilling back onto the freeway, and uneven lane utilization, the project should evaluate the adequacy of freeway segments near the project.

6) To reduce the project trips the project should develop Transportation Demand Management (TDM) measures and incorporate them in the Draft Environmental Impact Report (DEIR).

### **Vehicles Miles Traveled**

Given the project's intensification of use and significant amount of vehicle parking spaces, the project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Parking should be reduced significantly. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Outdoor areas with patios, furniture, pedestrian pathways, picnic and



- recreational areas
- Transit and trip planning resources such as a commute information kiosk;
- Increasing access to common goods and services, such as groceries, schools, and daycare;
- Providing traffic calming;
- Real-time transit information system;
- Transit subsidies on an ongoing basis;
- Lower parking ratios;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Emergency Ride Home program;
- Employee transportation coordinator at employment sites;
- Provide ride-matching services;
- Provide a guaranteed ride home service to users of non-auto modes
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve VMT reduction goals, then reports should include next steps to take in achieving those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

### **Lead Agency**

As the Lead Agency, the City of Redwood City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

### **Construction-Related Impacts**

Prior to construction, the City of Redwood City needs to coordinate with Caltrans to

develop a Transportation Management Plan (TMP) to reduce construction traffic impact to SR 82. Mitigation for significant impacts due to construction and noise should be identified in the DEIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications/>

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Michael McHenry at 510-286-5562 or michael.mchenry@dot.ca.gov.

Sincerely,



WAHIDA RASHID  
Acting District Branch Chief  
Local Development - Intergovernmental Review

c. State Clearinghouse



## CD-Lindy Chan

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**Subject:** FW: Environmental report elements

**From:** c sconcert

**Sent:** Saturday, February 22, 2020 9:30 AM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>

**Subject:** Environmental report elements

I attended last week's Planning Commission meeting and have a few questions about the South Main Mixed Use Project:

> I am also interested in the question posed by Commissioner Radcliffe regarding the geographic extent of the transportation impact in the upcoming EIR

> Noting that the Staff Report has listed areas that will not be reviewed because they are "less than significant", can you please advise what criteria is used to determine this status?

\*\*\*\*\*

A few areas in particular seem that they should be SOP for ALL proposed developments:

> the testing for hazardous materials in light of the type of automotive/machining businesses that occupied the sites.

> the impact on utilities ("just yesterday" we asked to reduce water use by 30% and we are now starting 2020 off with record no/low rain.)

> the impact on public services, assuming that means Fire and Police safety. Will the Developer underwrite the cost of additional staffing for these understaffed agencies? Is there not precedent in neighboring cities that have been more aggressive in securing concessions from Developers to contribute to the overall Community Services impact?

Thank you,  
Carol Sconcert  
650-291-1023

## CD-Lindy Chan

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**Subject:** FW: Response Re EIR for South Main Mixed Use Project

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**From:** ceasterbrook58

**Sent:** Friday, February 28, 2020 3:16 PM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>

**Subject:** Response Re EIR for South Main Mixed Use Project

February 28, 2020

To:

Lindy Chan, Acting Planning Manager

City of Redwood City

Community Development Department

1017 Middlefield Road

Redwood City, CA 94063

From:

Cheryl Jennings Easterbrook

307 Redwood Avenue

Redwood City, CA 94061

(650)722-2743

[ceasterbrook58@gmail.com](mailto:ceasterbrook58@gmail.com)

I request that the Environmental Impact Report for the "South Main Mixed Use" Project consider the negative health and safety impacts from increased vehicular traffic on Redwood Avenue between El Camino Real and Hudson that may be generated by this project and in aggregate with other proposed local area developments. I ask that the Environmental Impact Report address the impacts of vehicular cut through and diverted traffic including, but not to the exclusion of any other related potential environmental impact customarily studied, air quality issues.

Thank you very much.

Sent from my Galaxy Tab® A



## CD-Lindy Chan

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**Subject:** FW: South Main Mixed-Use Development Project NOP Comment  
**Attachments:** South Main Mixed-Use Development Project comment 08.08.2019.pdf

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**From:** Roman, Isabella@DTSC [mailto:Isabella.Roman@dtsc.ca.gov]  
**Sent:** Friday, February 28, 2020 1:15 PM  
**To:** CD-Lindy Chan <lchan@redwoodcity.org>  
**Subject:** South Main Mixed-Use Development Project NOP Comment

Hi,

I represent the Department of Toxic Substances Control reviewing the Revised Notice of Preparation for the South Main Mixed-Use Project.

I am requesting that Hazards and Hazardous Materials be discussed in the Draft Environmental Impact Report. I previously reviewed the Initial Study for this project and had some concerns that weren't addressed in the text. My previous comment is included as an attachment to this email. The Hazards and Hazardous Materials section should be included and discussed within the DEIR especially considering amount of site mitigation/cleanup activities mentioned within the Initial Study (Site Mitigation Plan, Vapor Extraction System etc.).

Please feel free to reach out with any questions or concerns.

Sincerely,

Isabella Roman  
Environmental Scientist  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control  
700 Heinz Avenue Suite 200  
Berkeley, CA 94710  
(510)-540-3879

**From:** Roman, Isabella@DTSC  
**Sent:** Thursday, August 08, 2019 10:19 AM  
**To:** lchan@redwoodcity.org  
**Subject:** South Main Mixed-Use Development Project comment/clarification

Hello,

I represent a responsible agency reviewing the Draft Initial Study (IS) for the South Main Mixed-Use Development Project.

The link to the IS (<https://www.redwoodcity.org/city-hall/current-projects/development-projects?id=91>) doesn't include the Appendices. I am specifically interested in the HAZ Appendix- Site Phase I and/or the Phase 1 Environmental Site Assessments and Screening Level Investigation Reports mentioned on page 88. Would you please provide me with these documents?

It's unclear whether a cleanup plan is currently planned. The text states the following when referring to the elevated levels found in the Screening Level Investigation reports: "The report concludes that these areas are generally shallow in extent and would likely be excavated during the proposed redevelopment" (page 91). Elsewhere in the text, it is stated that the Site Mitigation Plan will implement measures such as excavation to achieve the plan's cleanup targets. The contamination may be removed in this way, however it should be ensured that the Site will have adequate confirmation samples to certify the contamination has been removed to appropriate levels. The text discusses post-excavation confirmation soil samples, however this doesn't discuss the frequency or depth of these samples. It is discussed that future Site users will be protected from the soil gas vapors emitted from the regional groundwater plume, with the potential of a vapor extraction system being used to prevent exposure. However, the text doesn't mention any post-excavation soil gas confirmation sampling. Due to the nature of the proposed development, including residential and childcare uses, the contamination at the Site needs to be adequately addressed for protection of future Site users.

Characterizing the Site prior to starting removal actions would be beneficial to minimize the potential for having to go back in and remove any missed contaminated areas or having to implement other removal measures or institutional controls. If the contamination is characterized and bounded prior to removal, this may minimize the chance of encountering any "leftover" contamination which will need to be addressed by a land use control and/or vapor extraction systems. The IS mentions that the railroad was not identified as a potential source of contamination in previous reports. Only one sample near the railroad has been taken and it wasn't analyzed for all constituents associated with railroad use. Without being able to review the sampling reports, it's difficult to know the locations and depths of samples that were previously taken. The IS mentions that contamination is present in shallow soils. Were deeper depths tested and found to be below screening levels? Or were they not tested and therefore it is only known that shallow depths are contaminated? Additionally, soil gas samples don't appear to have been taken yet. Being fully aware of present contamination before removal actions take place (instead of just confirming their absence after the fact) would also be helpful in regards to Site/worker safety (e.g. preparing the Health and Safety Plan (establishing action levels, contingency measures if contaminated material is encountered etc.)).

Section 4.9.2) d.) (starting on page 95) discusses the Cortese List. The text states that one Cortese List site is located on the project site, and five are immediately adjacent. There are no Cortese List sites on or near the project. There are no Cortese List sites in all of Redwood City. The full list of Cortese List sites can be found here:

[https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site\\_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+\(CORTESE\)](https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE))

The 6 sites currently discussed in the IS are Geotracker and Envirostor cleanup sites. These are different than Cortese List sites (see the link above for more information on Cortese List sites). For DTSC, Cortese sites are sites where DTSC has

issued an order for cleanup. For IX.) d) on page 88, please consider changing it to “No Impact.” Please correct the text accordingly to show that there are no Cortese List sites on or adjacent to the Site. The discussion of the 6 overlapping or adjacent cleanup sites are helpful to include in the discussion to indicate potential contaminant contributions to the Site; however it should be corrected that these aren’t Cortese sites.

Please provide me with the reports mentioned above. Please clarify any of the above issues I pointed out and/or be sure to address them in the revised IS.

Thanks,

Isabella Roman  
Environmental Scientist  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control  
700 Heinz Avenue Suite 200  
Berkeley, CA 94710  
(510)-540-3879





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

GAVIN NEWSOM, Governor  
CHARLTON H. BONHAM, Director



February 21, 2020

Ms. Lindy Chan, Acting Planning Manager  
City of Redwood City  
Planning Services  
1017 Middlefield Road  
Redwood City, CA 94063  
[Lchan@redwoodcity.org](mailto:Lchan@redwoodcity.org)

Subject: South Main Mixed-Use Project, Revised Notice of Preparation of a Draft  
Environmental Impact Report, SCH #2019070208, City of Redwood City, San Mateo  
County

Dear Ms. Chan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) prepared by the City of Redwood City for the proposed South Main Mixed-use Project (Project) located in the City of Redwood City, San Mateo County. CDFW is submitting comments regarding potential impacts to biological resources associated with the proposed Project.

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

#### PROJECT DESCRIPTION AND LOCATION

The proposed Project area is located at the edge of Redwood City's Downtown core and is comprised of five contiguous blocks and one separate block.

The revised proposed Project includes the development of 570 residential units, approximately 530,000 square feet of office space, an 8,400-square-foot childcare facility, and 29,000 square feet of retail space.

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

## ENVIRONMENTAL SETTING

The state special-status species that have the potential to occur in or near the Project site, include:

- American Peregrine falcon (*Falco peregrinus anatum*), State listed under Fish and Game Code as fully protected;
- White-tailed kite (*Elanus leucurus*), State listed under Fish and Game Code as fully protected; and
- Nesting birds

## COMMENTS

### Comment 1: State Fully Protected Species

State fully protected species may occur within the Project area. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code §§ 3511, 4700, 5050, and 5515. Take, as defined by Fish and Game Code § 86 is to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill", of any fully protected species is prohibited and CDFW cannot authorize their incidental take. Without appropriate mitigation measures, Project activities conducted within occupied territories have the potential to significantly impact these species.

Without appropriate avoidance and minimization measures for fully protected species, potentially significant impacts associated with Project activities may include, but are not limited to inadvertent entrapment, reduced reproductive success, reduced health and vigor, nest abandonment, loss of nest trees, and/or loss of foraging habitat that would reduce nesting success (loss or reduced health or vigor of eggs or young), and direct mortality.

To evaluate potential impacts to fully protected species, CDFW recommends incorporating the following mitigation measures into the Project's EIR, and that these measures be made conditions of approval for the Project.

#### **Recommended Mitigation Measure 1: Fully Protected Habitat Assessment**

CDFW recommends that a qualified biologist conduct a habitat assessment, before Project implementation, to determine if the Project site or its vicinity contains suitable habitat for fully protected raptors.

#### **Recommended Mitigation Measure 2: Fully Protected Species Surveys**

To avoid impacts to fully protected species, CDFW recommends that a qualified biologist conduct species-specific surveys (using standard protocol or methodology, if available) of the Project site before Project implementation. If Project activities will take place when fully protected species are active or are breeding, CDFW recommends that additional pre-activity surveys for active nests or individuals be conducted by a qualified biologist no more than seven (7) days prior to the start of Project activities.

### **Recommended Mitigation Measure 3: Fully Protected Species Avoidance**

In the event a fully protected species is found within or adjacent to the Project site, CDFW recommends that a qualified wildlife biologist develops an appropriate no-disturbance buffer to be implemented. The qualified wildlife biologist should also be on-site during all Project activities to ensure that the fully protect species is not being disturbed by Project activities.

### **Comment 2: Nesting Birds**

CDFW encourages that Project implementation occur during the non-nesting season (late September to January); however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through early-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections:

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

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

## **REGULATORY REQUIREMENTS**

### *California Endangered Species Act*

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant

Ms. Lindy Chan  
City of Redwood City  
February 21, 2020  
Page 4 of 4

modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species [CEQA section 21001(c), 21083, and CEQA Guidelines section 15380, 15064, 15065]. Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

*Lake and Streambed Alteration Program*

Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

**FILING FEES**

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

Thank you for the opportunity to comment on the Project's NOP. If you have any questions regarding this letter, please contact Ms. Monica Oey, Environmental Scientist, at (707) 428-2088 or [monica.oey@wildlife.ca.gov](mailto:monica.oey@wildlife.ca.gov); or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at (707) 576-2786 or [randi.adair@wildlife.ca.gov](mailto:randi.adair@wildlife.ca.gov).

Sincerely,



Gregg Erickson  
Regional Manager  
Bay Delta Region

cc: State Clearinghouse #2019070208



## CD-Lindy Chan

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**Subject:** FW: South main mixed use Greystar project

-----Original Message-----

From: Helene Hollander

Sent: Sunday, February 23, 2020 12:56 PM

To: CD-Lindy Chan <lchan@redwoodcity.org>

Subject: South main mixed use Greystar project

I live at Franklin st apartments. It

May seem unimportant but to Franklin st apartments residents who have lived with Greystar projects please include consideration to us residents.(let's just say after 5 years of living next door to Greystar development I would not have commended it for anything positive).

Traffic on Maple and El Camino Real. Please better traffic control and no disruption of Maple st or Main up to Maple. And If possible no disruption to El Camino between Woodside road and Jefferson. Regarding current Greystar projects The workmen doing it now are not helpful. Big problem is parking for the construction staff. They take away what spaces(and non spaces) we have. No resident or guest parking has been allowed on most of Franklin for 5 years although it's marked as such.

Protect everything North west of Main so that the 5 apartment buildings and over 1200 residents can finally live without dust, noise and construction crews (and crime).

The workmen create traffic and noise but no one remembers that.it would be thrilling to receive over 35 or more parking spaces we once had.

What project is going on along Maple near ElCamino? When will that be completed. How many projects will be going on at the same time?

Thank you

Helene Hollander

Sent from iPhone. Helene

## CD-Lindy Chan

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**Subject:** FW: South Main Mixed Use

-----Original Message-----

From: Jeremy Smith

Sent: Wednesday, February 26, 2020 3:53 PM

To: CD-Lindy Chan <lchan@redwoodcity.org>

Subject: South Main Mixed Use

I request the EIR consider the following:

- 1) impacts to potential future rail work along the Caltrain Joint Powers Authority ROW including expansion to 4 track, grade separations, etc.
- 2) the large amount of parking spaces and their impact to greenhouse gas emissions and VMT
- 3) the jobs-housing imbalance and feasibility of mitigation through contributions to RWC housing initiatives
- 4) impacts to potential future bike lanes and bus rapid transit along El Camino Real

Thank you!

Jeremy Smith



## NATIVE AMERICAN HERITAGE COMMISSION

January 30, 2020

Lindy Chan  
Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

**Re: 2019070208, South Main Mixed-Use Development Project, San Mateo County**

Dear Ms. Chan:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

CHAIRPERSON  
**Laura Miranda**  
Luiseño

VICE CHAIRPERSON  
**Reginald Pagaling**  
Chumash

SECRETARY  
**Merri Lopez-Keifer**  
Luiseño

PARLIAMENTARIAN  
**Russell Attebery**  
Karuk

COMMISSIONER  
**Marshall McKay**  
Wintun

COMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
Apache

COMMISSIONER  
**Joseph Myers**  
Pomo

COMMISSIONER  
**Julie Tumamait-Stenslie**  
Chumash

COMMISSIONER  
[Vacant]

EXECUTIVE SECRETARY  
**Christina Snider**  
Pomo

**NAHC HEADQUARTERS**  
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[NAHC.ca.gov](http://NAHC.ca.gov)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).



- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

**11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)



## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Nancy.Gonzalez-Lopez@nahc.ca.gov](mailto:Nancy.Gonzalez-Lopez@nahc.ca.gov).

Sincerely,



Nancy Gonzalez-Lopez  
Staff Services Analyst

cc: State Clearinghouse



Harold M. Freiman  
Attorney at Law

E-mail: [hfreiman@lozanosmith.com](mailto:hfreiman@lozanosmith.com)

February 28, 2020

**By U.S. Mail & E-Mail: [lchan@redwoodcity.org](mailto:lchan@redwoodcity.org)**

Ms. Lindy Chan, Acting Planning Manager  
City of Redwood City, Planning Services  
1017 Middlefield Road,  
Redwood City, CA 94063

Re: Response of Sequoia Union High School District to Revised Notice of  
Preparation of an Environmental Impact Report for the South Main Mixed-Use Project

Dear Ms. Chan:

This office represents Sequoia Union High School District ("District"). On behalf of the District, we are hereby submitting comments regarding the Revised Notice of Preparation of an Environmental Impact Report ("NOP"), which environmental impact report ("EIR") the City of Redwood City ("City") plans to prepare for the project to be located on five contiguous blocks totaling 8.30 acres between El Camino Real, Maple Street, Cedar Street, and Main Street ("Parcels A-E"), and one separate, 0.15-acre block located at 1304 El Camino Real (at Jackson Avenue) ("Parcel F"), in Redwood City, California (collectively, the "Project"). The District previously submitted comments to the City in response to the City's initial Notice of Preparation on August 9, 2019. In this letter, the District, in addition to reiterating many of its prior concerns regarding the Project, raises several new concerns.

According to the revised NOP, the proposed Project, sponsored by Greystar GP II, LLC ("Developer"), will still consist of the demolition of existing auto storage and repair, restaurant, and office uses, but now will include the construction of 540 multi-family residential units (an increase of 249 units), 530,000 square feet ("sf") of office uses (a reduction of 19,000 sf), an 8,400 sf childcare facility (reduction of 100 sf), and 29,000 sf of retail uses (an increase of 1,000 sf). The Project's Parcels A-E and Parcel F are located approximately 0.8 and 0.6 miles southeast of the District's Sequoia High School, respectively. The City, in its original NOP, proposed to prepare a limited or "focused" EIR which would evaluate only six environmental topics: (1) aesthetics, (2) air quality, (3) cultural resources, (4) greenhouse gas emissions, (5) noise, and (6) transportation. In the revised NOP, the City has now eliminated noise from its list of topics to be analyzed in the EIR, despite the fact that the Initial Study upon which the NOP was based has not been revised.



The unrevised Initial Study, in part because it misrepresents the distance between the District's Sequoia High School and the Project, does not adequately evaluate the Project's impacts to the District. The Initial Study fails adequately to address how the Project will impact the District's ability to house its students; how the Project's impacts on transportation, traffic, and circulation in the area will impact air quality at Sequoia High School, as well as the safety and convenience of District students, parents, and staff; and generally how the Project will impact the District's ability to deliver its educational program at Sequoia High School. Further, the City, through its unrevised Initial Study, inappropriately concludes that the Project will have less than significant impacts on the District's ability to provide its public service because school impact fees paid by the Developer will constitute "full and complete mitigation" under CEQA pursuant to California Senate Bill (SB) 50.

All of the above discussed impacts to the District, including impacts related to transportation, circulation, and traffic; air quality; noise; population; housing; and public services, must be analyzed in the EIR for the Project. Below are specific concerns of the District regarding the Initial Study, and scoping requests for the EIR, all of which the City must address in the EIR to evaluate adequately the potential environmental impacts of the Project on the District.

### **Inappropriate Reliance on SB 50**

The City, in its Initial Study, appears to rely on SB 50 in determining that school impact fees (also referred to as "developer fees"), are adequate to completely mitigate all impacts caused by the Project on the District. Such reliance is neither legally nor factually justified, and displays a lack of understanding of how school facilities are funded.

By way of background, developer fees are fees that may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property. (Ed. Code § 17620.) "Level 1" developer fees are levied against residential and commercial or industrial developments on a price per square foot basis. If a district is able to establish a sufficient "nexus" between the expected impacts of residential and commercial development and the district's needs for facilities funding, then the district may charge up to \$4.08 per sf of residential development, and up to \$0.66 per sf of commercial development, which maximum amounts may be increased every two years based on the statewide cost index for class B construction.

SB 50 declares that the payment of the developer fees authorized by Education Code section 17620 constitutes "full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities." (Gov. Code § 65995(h).) However, California courts have since acknowledged that developer fees do not constitute full and complete mitigation for school-related impacts other than school overcrowding. (*Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016.) Thus, contrary to the assertions of the City in the Initial Study, the payment of fees do not constitute full mitigation for all impacts caused by development related to traffic, noise, biological, pedestrian safety, and all other types of impacts related to the District and its educational program.

From a practical standpoint, the amount of developer fees received by school districts typically fall woefully short of alleviating the impacts caused by development. This is due largely to the facts that: (1) statutory developer fee amounts fail to acknowledge the differences in costs of school construction from one district to another, which particularly burdens school districts in the bay area; (2) the developer fee amounts fail to contemplate the special facilities needs of those districts experiencing rapid growth, such as the need for portables; and (3) the adjustment formula for developer fees is based on a “construction cost index” and does not include indexing related to the increases in land costs, resulting in the actual costs of facilities (i.e., land and improvements) increasing at a greater rate than the adjustment.

The inadequacy of developer fees as a source of funding for school facilities has forced school districts to rely increasingly on other sources of funding, primarily including local bond funds and State bond funds administered under the State Facilities Program (SFP). However, these sources of funds can be equally unreliable. The last State school facilities bond fund (Proposition 51) has been exhausted, and it is currently unclear when/whether those school districts that apply for state funding will be able to receive such funding. Local bond funds are also difficult to generate, as local bonds are subject to school district bonding capacity limitations and voter approval. Either way, the funding formula was never intended to require the State and local taxpayers to shoulder a disproportionate portion of the cost of school facilities.

Additional changes to the developer fee landscape render the analysis of environmental impacts under the Initial Study inadequate. For one, if Proposition 13, placed on the ballot by California Assembly Bill (“AB”) 48, is approved by the California voters at the March 2020 election, each of the three sources of funds discussed above will be significantly altered. Of particular note, and further undermining the contention that developer fees constitute full and adequate mitigation for impacts caused by the Project, AB 48: (1) eliminates school impact fees for multifamily homes within a half mile of a major transit stop; (2) reduces impact fees for all other multifamily homes by 20%; and (3) suspends level 3 school impact fees. Without full payment of school impact fees from the Project and other residential projects in the area, coupled with the extremely high and rising costs of land, the District will be unable to alleviate many of the Project’s impacts through the acquisition of land and construction of new school facilities.

For the foregoing reasons, the City’s reliance upon SB 50 as a panacea to all impacts caused by the Project on the District is inappropriate, and the City must consider each of the following topics in its EIR.

#### **Transportation/Circulation/Traffic Analysis**

- 1. Describe the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including movement patterns to and from Sequoia High School, and including consideration of bus routes.**
- 2. Assess the impact(s) of increased vehicular movement and volumes caused by the Project, including but not limited to potential conflicts with school**

**pedestrian movement, school transportation, and busing activities to and from Sequoia High School.**

- 3. Estimate travel demand and trip generation, trip distribution and trip assignment by including consideration of school sites and home-to-school travel.**
- 4. Assess cumulative impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending.**
- 5. Discuss the direct, indirect, and cumulative impacts on the circulation and traffic patterns in the community as a result of traffic generated by the transportation needs of students to and from the Project and schools throughout the District during the Project build-out.**
- 6. Assess the impacts on the routes and safety of students traveling to school by vehicle, bus, walking, and bicycles.**

The District has significant concerns about the traffic, transportation, and circulation impacts that the Project may have on the District, including the District's staff, parents, and students that attend Sequoia High School. The foregoing categories of information are critical for determining the extent of those impacts on the District, none of which were adequately identified or discussed in the Initial Study.

**A. City Must Consider All Traffic and Related Impacts, Including Impacts of Traffic on Student Safety, Caused by the Project.**

Any environmental analysis related to the proposed Project must address potential effects related to traffic, noise, air quality, and any other issues affecting schools. (Pub. Resources Code, §§ 21000, *et seq.*; Cal. Code Regs., tit. 14, §§ 15000, *et seq.*; *Chawanakee Unified School District v. County of Madera, et al.*, (2011) 196 Cal.App.4th 1016.) Additionally, specifically related to traffic, there must be an analysis of safety issues related to traffic impacts, such as reduced pedestrian safety, particularly as to students walking or bicycling to and from Sequoia High School; potentially reduced response times for emergency services and first responders traveling to these schools; and increased potential for accidents due to gridlock during school drop-off and pick up hours. (See, Journal of Planning Education and Research, "Planning for Safe Schools: Impacts of School Siting and Surrounding Environments on Traffic Safety," November 2015, Chia-Yuan Yu and Xuemei Zhu, pg. 8 [Study of traffic accidents near Austin, Texas schools found that "[a] higher percentage of commercial uses was associated with more motorist and pedestrian crashes" around schools].)

The State Office of Planning and Research has developed new CEQA Guidelines which set forth new criteria for the assessment of traffic impacts, and now encourages the use of metrics such as vehicle miles traveled (VMT), rather than level-of-service (LOS), to analyze project impacts on traffic. (14 Cal. Code Regs. § 15064.3.) However, local agencies may still consider impacts on

traffic congestion at intersections where appropriate, and must do so where, as here, such traffic congestion will cause significant impacts on air quality, noise, and safety issues caused by traffic. (Pub. Res. Code § 21099(b)(3).)

The Project site is located in an area that has experienced a drastic impact in traffic over the last ten to fifteen years as the City has continued to approve of newer commercial, office, and residential land uses. The Project site's neighborhood, which is located on the periphery of the City's downtown core, is also one of the most heavily traversed areas in Redwood City. According to the City's General Plan, El Camino Real (State Route 82), off of which both the Sequoia High School and the Project sites are located, is one of the few major boulevards in the City, and serves as a regional route connecting San Jose and San Francisco.<sup>1</sup> El Camino Real already suffers from substantial vehicular congestion, which produces noise, exhaust fumes, and pollution.<sup>2</sup> Further, a trend currently exists where commuters along El Camino Real seek less-congested travel paths in the residential neighborhoods to the north and south of the boulevard, resulting in speeding and dangerous traffic conditions in those neighborhoods, including those residential neighborhoods surrounding the Sequoia High School.<sup>3</sup> Acknowledging these issues, the City's General Plan provides that El Camino Real "will be updated to facilitate walkable linkages between Sequoia High School, the transportation center at the Caltrain Station, and Downtown Redwood City."<sup>4</sup>

**The construction of and traffic generated by the Project, and especially as modified, will severely exacerbate the already stifling traffic in the general area, and the safety issues posed thereby. These impacts will severely inhibit the District's abilities to operate its educational programs, including at Sequoia High School.**

The proposed Project is anticipated to impede circulation in the neighborhoods surrounding Sequoia High School, and clog the access roads to, from, and around the District's high school. (See, 5 Cal. Code Regs. § 14010(k), which requires that school facilities be easily accessible from arterial roads.) As discussed, the Project's Parcels A-E and Parcel F are located approximately 0.8 and 0.6 miles southeast of the District's Sequoia High School, respectively. Thus, both Sequoia High School and the Project site will be accessed by the same roads. Per the Initial Study, the proposed Project, before the residential component was almost doubled in size, would cause the traffic volumes at the Project's site to increase by 630 vehicles and 535 vehicles during the AM and PM peak hours, respectively. It is anticipated that the Project will draw hundreds of additional office workers and residents to the area. This substantial influx of new vehicles and residents will severely exacerbate the already stifling traffic in the neighborhood and the safety issues posed thereby, including by further diverting traffic away from El Camino Real and into the residential neighborhoods surrounding Sequoia High School.

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<sup>1</sup> Redwood City General Plan (October 11, 2010), p. BE-25

<sup>2</sup> *Id.* at Figure BE-14; pp. BE-106 and BE-131.

<sup>3</sup> *Id.* at p. BE-134.

<sup>4</sup> Redwood City General Plan (October 11, 2010), p. BE-25



The City's roads, and in particular those roads running through neighborhoods surrounding Sequoia High School, are not currently equipped to accommodate such high density development and high levels of traffic. Accordingly, such increases to traffic in the area will not only make it much more difficult for students and staff to travel to and from Sequoia High School, but will also drastically increase the risk of vehicular accidents to District families, students, and staff traveling to and from school, and make it much more difficult for emergency vehicles to access the school.

In addition to increased risks of vehicular accidents, the traffic impacts posed by the Project will severely impact the safety and convenience of Sequoia High School students who walk or bike to school. Title 5 of the California Code of Regulations requires that school sites be located within a proposed attendance area that encourages student walking and avoids extensive bussing. (5 Cal. Code Regs. § 14010(l).) To mitigate the impacts of increased traffic in areas surrounding District schools and to enhance the safety of school children who walk or bike to school, the District has committed to supporting and promoting a safe routes to school program.<sup>5</sup> The Project, and especially as modified, will undermine the District's abilities to implement its program.

#### **B. City Must Consider Cumulative Traffic and Related Impacts.**

Environmental impact reports must discuss cumulative impacts of a project when the project's effects on the environment, viewed in conjunction with impacts of other past, present, or reasonably foreseeable future projects, is cumulatively considerable. (14 CCR 15130(a).) (See *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 CA4th 713, 720, finding that piecemeal approval of several projects with related impacts could lead to severe environmental harm.) While a lead agency may incorporate information from previously prepared program EIRs into the agency's analysis of a project's cumulative impacts, the lead agency must address all cumulative impacts that were not previously addressed in the program EIR. (Pub. Res. Code § 21083.3(c); 14 Cal. Code Regs. § 14183(b)(3).)

The Project's above- and below-discussed anticipated impacts on the District, combined with the anticipated impacts of the vast number of development projects that have recently been approved in the area, are cumulatively considerable. All of these impacts are exacerbated by the rapidity at which the City is approving of development projects in the area, as the District and City are unable to accommodate the massive influx of students through facilities, infrastructure, and related improvements.

In reviewing the City's website, between the 1305 El Camino Real project (137 multi-family residential units); 103 Wilson Street project (175 dwelling units); 1548 Maple Street project (131 three-story townhome residential units); 353 Main Street (125 units); and the Broadway Plaza project (520 residential units, 420,000 sf of office space, and 26,000 sf of retail space), there have been over 1,000 residential units recently approved or completed in the area. There are

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<sup>5</sup> See Sequoia Union High School District Board Policy and Administrative Regulation Nos. 5142.2.

several other projects that are being considered by the City, including the 150 Charter Street project (72 residential units), and the 1125 Arguello Street project (68 townhomes), all of which promise to drastically increase traffic in the neighborhood and District.

Each of these projects alone promises to drastically increase traffic in the neighborhood, resulting in air quality, noise, and safety issues for District families and staff attending Sequoia High School. When considered together, their collective impacts on traffic, safety, and air quality in the neighborhood will be devastating. **The impacts of the Project must be analyzed in conjunction with the anticipated impacts of all the other development being considered and approved in this area.**

### **Noise**

- 7. Identify any noise sources and volumes which may affect school facilities, classrooms, and outdoor school areas.**

The City's original NOP included noise as one of the topics to be analyzed in the Project EIR. The City's revised NOP has, without explanation, removed noise as a topic to be analyzed. The District strongly objects to the City's disregard of noise impacts.

The City's disregard of noise impacts is based on an Initial Study which assumes that only 291 residential units would be constructed as part of the Project. (See Initial Study, p. 4.13-11, which describes anticipated increases in traffic caused by the Project.) As this assumption has changed and the Project's residential component has increased in scope, it would be improper for the City to disregard potential impacts of the Project without having adequately identified or analyzed these impacts. Further, the Initial Study did not specifically consider whether noise generated from construction and operation of the Project will cause significant impacts on the District's educational program at Sequoia High School. Rather, the entire Initial Study is based on the incorrect assumption that the District's Sequoia High School is located 1.5 miles away from the Project site.

Request No. 7 is intended to clarify that the EIR's consideration of noise issues takes into account all of the various ways in which noise may impact schools, including increases in noise levels in the immediate vicinity of Sequoia High School.

### **Air Quality**

- 8. Identify and assess the direct and indirect air quality impacts of the Project on sensitive receptors, such as the District's Sequoia High School.**
- 9. Identify and assess cumulative air quality impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending in the City and Project neighborhood.**

The Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines (May 2017) impose numerous limitations on the exposure of "sensitive receptors," such as schools, to odors, toxics, and pollutants, including pollutants from vehicular exhaust.

It is anticipated that the Project, including when viewed in conjunction with all of the other development being considered and approved in the City and Project's neighborhood, will have a significant impact on the air quality of the neighborhood due to extensive construction activities and increases in vehicular traffic. Even more pressing, the Project is anticipated to result in significant impacts to sensitive receptors as an increased number of vehicles enter and exit the Project site and neighborhood, creating increased levels of air toxins and particulate matter that could negatively impact student health. These impacts, as they relate to the District's students at the Sequoia High School, were not adequately identified or addressed in the Initial Study.

### **Population**

**10. Describe historical, current, and future population projections for the District.**

The District anticipates that this project will generate students and specifically requests that historical, current, and future population projections for the District be addressed in the EIR. Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact the District and its provision of educational services, largely because of resulting school overcrowding, while a district with declining enrollment may depend on new development to avoid school closure or program cuts. Overcrowding can constitute a significant impact within the meaning of the California Environmental Quality Act ("CEQA"). (See, Cal. Code Regs., tit.14, §§ 15064(e).) This is particularly true where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and a need for new school construction. (See *Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016.)

### **Housing**

- 11. Describe the type and number of anticipated dwelling units indirectly resulting from the Project.**
- 12. Describe the average square footage for anticipated dwelling units, broken down by type of unit, indirectly resulting from the Project.**
- 13. Estimate the amount of development fees to be generated by development in accordance with implementation of the Project.**
- 14. Describe the phasing of residential and development over time from inception to build-out of the Project.**
- 15. Identify the anticipated number of units available for low-income housing.**

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District caused by increased population growth. As discussed above, California school districts are dependent on developer fees authorized by the provisions of Government Code sections 65995, *et seq.*, and Education Code sections 17620, *et seq.*, for financing new school facilities and maintenance of existing facilities. The developer fees mandated by section 65995 provide the District the bulk of its local share of financing for facilities needs related to development.

The adequacy of the statutory development fees to offset the impact of new development on local school districts can be determined only if the types of housing and average square footage can be taken into consideration. For instance, larger homes often generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek – and presumably to receive – such square footage information from local planning departments. (Gov. Code § 65995.5(c)(3).)

While the foregoing funding considerations are fiscal issues, they translate directly into physical, environmental impacts, in that inadequate funding for new school construction can result in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to an EIR, particularly when they either contribute to or result from physical impacts. (Pub. Res. Code § 21001(g); Cal. Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

Phasing of development is also a crucial consideration in determining the extent of impact on schools. The timing of the development will determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other approved or pending development.

#### **Public Services - Schools**

- 16. Describe existing and future conditions within the District, on a school-by-school basis, including size, location and capacity of facilities.**
- 17. Describe the adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.**
- 18. Describe the District's past and present enrollment trends.**
- 19. Describe the District's current uses of its facilities.**
- 20. Describe projected teacher/staffing requirements based on anticipated population growth and existing State and District policies.**
- 21. Describe any impacts on curriculum as a result of anticipated population growth.**



- 22. Identify the cost of providing capital facilities to accommodate students on a per-student basis, by the District.**
- 23. Identify the expected shortfall or excess between the estimated development fees to be generated by the Project and the cost for provision of capital facilities.**
- 24. Assess the District's present and projected capital facility, operations, maintenance, and personnel costs.**
- 25. Assess financing and funding sources available to the District, including but not limited to those mitigation measures set forth in Section 65996 of the Government Code.**
- 26. Identify any expected fiscal impacts on the District, including an assessment of projected cost of land acquisition, school construction, and other facilities needs.**
- 27. Assess cumulative impacts on schools resulting from additional development already approved or pending.**

As discussed above, the Project will have numerous impacts on the District's ability to provide its educational program. Furthermore, the City's reliance upon SB 50 as the sole mitigation measure to any impacts caused by the Project is both legally and practically improper, as developer fees are legally and practically inadequate to mitigate all impacts caused by the Project. Accordingly, the District submits that each of the above scoping requests must be directly discussed in the EIR.

### **Conclusion**

The District does not oppose development within District boundaries, and recognizes the importance of housing on the health and welfare of the community. However, the District maintains that the community can only thrive if the District's educational program and its facilities are viable and sufficient, and District staff, families, and students are safe. Accordingly, the needs of the District must be appropriately considered in the environmental review process for all proposed new development that will impact the District, such as the very large Project under consideration.

The District is hopeful that its continued collaboration with Developer and the City will yield solutions that alleviate the impacts caused by the Project, and is prepared to provide any information necessary to assist the City in preparation of the EIR and in addressing each of the comment and scope/content issues set forth above.

We request that all notices and copies of documentation with regard to this Project be mailed both to the District directly, and also to our legal counsel's attention as follows:

Ms. Lindy Chan, Principal Planner  
City of Redwood City, Planning Services  
February 28, 2020  
Page 11

Crystal Leach, Associate Superintendent, Administrative Services  
Sequoia Union High School District  
480 James Avenue  
Redwood City, CA 94062

Harold M. Freiman, Esq.  
Lozano Smith  
2001 N. Main St., Suite 500  
Walnut Creek, CA 94596

Please feel free to contact me directly if we can be of any assistance in reviewing the above issues. Thank you.

Sincerely,

LOZANO SMITH



Harold M. Freiman

HMF/gc

cc: Crystal Leach, Associate Superintendent (cleach@seq.org)  
Mary E. Streshly, Superintendent (mstreshly@seq.org)



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

Notice of Preparation

January 29, 2020



To: Reviewing Agencies  
Re: South Main Mixed-Use Development Project  
SCH# 2019070208

Attached for your review and comment is the Notice of Preparation (NOP) for the South Main Mixed-Use Development Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Lindy Chan  
Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063**

with a copy to the State Clearinghouse in the Office of Planning and Research at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov). Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019070208/3>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

cc: Lead Agency

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #2019070208

**Project Title:** South Main Mixed-Use Development Project

Lead Agency: Redwood City Community Development Department

Contact Person: Lindy Chan

Mailing Address: 1017 Middlefield Road

Phone: (650) 780-7237

City: Redwood City

Zip: 94063

County: San Mateo County

**Project Location:** County: San Mateo

City/Nearest Community: Redwood City

Cross Streets: El Camino Real, Maple, Cedar and Main

Zip Code: 94063

Longitude/Latitude (degrees, minutes and seconds): ° ' " N / ° ' " W Total Acres: 8.3

Assessor's Parcel No.: Multiple

Section: Twp.: Range: Base:

Within 2 Miles: State Hwy #: US 101

Waterways: San Francisco Bay, Redwood Creek

Airports:

Railways: Caltrain

Schools: Multiple

**Document Type:**

CEQA: ☐ NOP ☐ Draft EIR NEPA: ☐ NOI Other: ☐ Joint Document  
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document  
☐ Neg Dec (Prior SCH No.) ☐ Draft EIS ☐ Other:  
☐ Mit Neg Dec Other: Revised NOP ☐ FONSI

**Local Action Type:**

☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation  
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment  
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit  
☐ Community Plan ☒ Site Plan ☐ Land Division (Subdivision, etc.) ☐ Other:

**Development Type:**

☒ Residential: Units 540 Acres \_\_\_\_\_  
☒ Office: Sq.ft. 530k Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☒ Commercial: Sq.ft. 28k Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☐ Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  
☐ Educational: \_\_\_\_\_  
☐ Recreational: \_\_\_\_\_  
☐ Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

☐ Transportation: Type \_\_\_\_\_  
☐ Mining: Mineral  
☐ Power: **STATE CLEARINGHOUSE**  
☐ Waste Treatment: Type \_\_\_\_\_ MGD  
☐ Hazardous Waste: Type \_\_\_\_\_  
☐ Other: \_\_\_\_\_

**Project Issues Discussed in Document:**

☒ Aesthetic/Visual ☐ Fiscal ☒ Recreation/Parks ☒ Vegetation  
☐ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality  
☒ Air Quality ☒ Forest Land/Fire Hazard ☒ Septic Systems ☒ Water Supply/Groundwater  
☒ Archeological/Historical ☒ Geologic/Seismic ☒ Sewer Capacity ☒ Wetland/Riparian  
☒ Biological Resources ☒ Minerals ☒ Soil Erosion/Compaction/Grading ☐ Growth Inducement  
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use  
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☐ Cumulative Effects  
☐ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☐ Other:

**Present Land Use/Zoning/General Plan Designation:**

Mixed-Use Corridor/ Mixed Use- Live/Work/ Mixed-Use Downtown

**Project Description:** (please use a separate page if necessary)

The proposed project would develop 540 multifamily residential units, an addition of 249 units from the NOP published in July 2019. The project would also include approximately 530,000 square feet of office uses, a reduction of approximately 19,000 square-foot reduction from the July 2019 NOP. The project also includes an 8,400-square-foot childcare facility (not including 5,800 square feet of dedicated outdoor space), and 28,000 square feet of retail uses including about 19,000 square feet of ground-floor space designed to accommodate retail-entertainment uses. The approximately 40,000 square feet of public open space proposed throughout the site would include a public creek walk, and a park at Shasta Street and Chestnut Street.



# NOP Distribution List

County: San Mateo

SCH#

2019070208

## Resources Agency

☒ Resources Agency  
Nadell Gayou

☐ Dept. of Boating & Waterways  
Denise Peterson

☐ California Coastal Commission  
Allyson Hitt

☐ Colorado River Board  
Elsa Contreras

☒ Dept. of Conservation  
Crina Chan

☒ Cal Fire  
Dan Foster

☐ Central Valley Flood Protection Board  
James Herota

☒ Office of Historic Preservation  
Ron Parsons

☒ Dept of Parks & Recreation  
Environmental Stewardship Section

☒ S.F. Bay Conservation & Dev't. Comm.  
Steve Goldbeck

☒ Dept. of Water Resources  
Resources Agency  
Nadell Gayou

## Fish and Wildlife

☐ Dept. of Fish & Wildlife  
Scott Flint  
Environmental Services Division

☐ Fish & Wildlife Region 1  
Curt Babcock

☐ Fish & Wildlife Region 1E  
Laurie Harnsberger

☐ Fish & Wildlife Region 2  
Jeff Drongesen

☒ Fish & Wildlife Region 3  
Craig Weightman

☐ Fish & Wildlife Region 4  
Julie Vance

☐ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program

☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation Program

☐ Fish & Wildlife Region 6 I/M  
Heidi Calvert  
Inyo/Mono, Habitat Conservation Program

☐ Dept. of Fish & Wildlife M  
William Paznokas  
Marine Region

## Other Departments

☐ California Department of Education  
Lesley Taylor

☐ OES (Office of Emergency Services)  
Monique Wilber

☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture

☐ Dept. of General Services  
Cathy Buck  
Environmental Services Section

☒ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

## Independent Commissions, Boards

☐ Delta Protection Commission  
Erik Vink

☐ Delta Stewardship Council  
Anthony Navasero

☐ California Energy Commission  
Eric Knight

☒ Native American Heritage Comm.  
Debbie Treadway

☒ Public Utilities Commission  
Supervisor

☐ Santa Monica Bay Restoration  
Guangyu Wang

☒ State Lands Commission  
Jennifer Deleong

☐ Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques

Cal State Transportation Agency CalSTA

☐ Caltrans - Division of Aeronautics  
Philip Crimmins

☐ Caltrans - Planning HQ LD-IGR  
Christian Bushong

☒ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

☐ Caltrans, District 1  
Rex Jackman

☐ Caltrans, District 2  
Marcelino Gonzalez

☐ Caltrans, District 3  
Susan Zanchi

☒ Caltrans, District 4  
Mark Leong

☐ Caltrans, District 5  
Larry Newland

☐ Caltrans, District 6  
Michael Navarro

☐ Caltrans, District 7  
Dianna Watson

☐ Caltrans, District 8  
Mark Roberts

☐ Caltrans, District 9  
Gayle Rosander

☐ Caltrans, District 10  
Tom Dumas

☐ Caltrans, District 11  
Jacob Armstrong

☐ Caltrans, District 12  
Maureen El Harake

## Cal EPA

Air Resources Board

☐ Airport & Freight  
Jack Wursten

☒ Transportation Projects  
Nesamani Kalandiyur

☐ Industrial/Energy Projects  
Mike Tollstrup

☐ California Department of Resources, Recycling & Recovery  
Kevin Taylor/Jeff Esquivel

☐ State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance

☐ State Water Resources Control Board  
Cindy Forbes - Asst Deputy  
Division of Drinking Water

☐ State Water Resources Control Board  
Div. Drinking Water #

☒ State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality

☐ State Water Resources Control Board  
Phil Crader  
Division of Water Rights

☐ Dept. of Toxic Substances Control Reg. #  
CEQA Tracking Center

☐ Department of Pesticide Regulation  
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

☒ RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)

☐ RWQCB 3  
Central Coast Region (3)

☐ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

☐ RWQCB 5S  
Central Valley Region (5)

☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

☐ RWQCB 6  
Lahontan Region (6)

☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

☐ RWQCB 7  
Colorado River Basin Region (7)

☐ RWQCB 8  
Santa Ana Region (8)

☐ RWQCB 9  
San Diego Region (9)

☐ Other



**Community Development  
Department**

Planning Division  
1017 Middlefield Road  
Redwood City, CA 94063



(650) 780-7234  
[planning@redwoodcity.org](mailto:planning@redwoodcity.org)  
[www.redwoodcity.org](http://www.redwoodcity.org)

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## NOTICE OF PREPARATION and NOTICE OF PUBLIC SCOPING MEETING

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<b>DATE:</b>	July 9, 2019
<b>TO:</b>	Responsible Agencies, Trustee Agencies, and Other Interested Parties
<b>FROM:</b>	City of Redwood City, Lead Agency
<b>APPLICANT:</b>	Greystar Development
<b>SUBJECT:</b>	Notice of Preparation and a Scoping Meeting for a Draft Environmental Impact Report for the Proposed South Main Mixed-Use Project

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The City of Redwood City (City) is considering the proposed South Main Mixed-Use Project and determined that an Environmental Impact Report (EIR) will be necessary to evaluate environmental impacts of the project, per the California Environmental Quality Act (CEQA). In compliance with CEQA, the City will be the Lead Agency and will prepare the EIR. Attached are the project description, location maps, and preliminary identification of the potential environmental issues to be explored. The project-specific Initial Study is also attached and/or available at the web link provided below.

The City is requesting comments and guidance on the scope and content of the EIR and the Initial Study from responsible and trustee agencies, interested public agencies, organizations, and the general public (CEQA Guidelines 15082). If your agency is a responsible agency as defined by Section 15381 of the CEQA Guidelines, your agency may use the environmental documents prepared by the City when considering permits or approvals for action regarding the project.

**Public Review Period: July 9, 2019 to August 9, 2019.** The City requests review and consideration of this notice and the Initial Study, and invites comments regarding the preparation of the EIR. The Notice of Preparation and Initial Study are available for review online at:

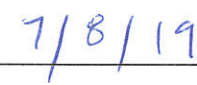
[www.redwoodcity.org/developmentprojects](http://www.redwoodcity.org/developmentprojects)

Comments and responses to this notice must be in writing and submitted by the close of business on the last day of the comment period. Please provide a contact name, phone number and email address with your comments. All comments must be sent to:

City of Redwood City, Planning Services  
Attention: Lindy Chan, Principal Planner  
1017 Middlefield Road, Redwood City, CA 94063  
(650) 780-7237 | [lchan@redwoodcity.org](mailto:lchan@redwoodcity.org)

The public **Scoping Meeting** on the Draft Environmental Impact Report for the proposed project will be held on **July 30, 2019 at 7:00pm** at the City of Redwood City, City Hall Council Chamber.

  
\_\_\_\_\_  
Lindy Chan, Principal Planner, City of Redwood City

  
\_\_\_\_\_  
Date



## Notice of Preparation for an Environmental Impact Report for the City of Redwood City South Main Mixed-Use Project

Date of Distribution: July 9, 2019

### Project Title and Applicant

South Main Mixed-Use Project by Greystar Development

### Project Location

The project site is located at the periphery of the City's Downtown core and is composed of five contiguous blocks totaling 8.30 acres (Parcels A through E) and one separate block of approximately 0.15 acre (Parcel F), as shown in Figure 1.

Parcels A through E are bounded by El Camino Real, Maple Street, Elm Street, Main Street, Caltrain right-of-way, Chestnut Street, Shasta Street, and Cedar Street. Parcel F is approximately 1,000 feet northwest of Parcels A through E at the southwest corner of El Camino Real and Jackson Avenue. Lathrop Street and Main Street run through Parcels A through E in a north-south direction and Beech Street and Cedar Street in an east-west direction.

### Project Description

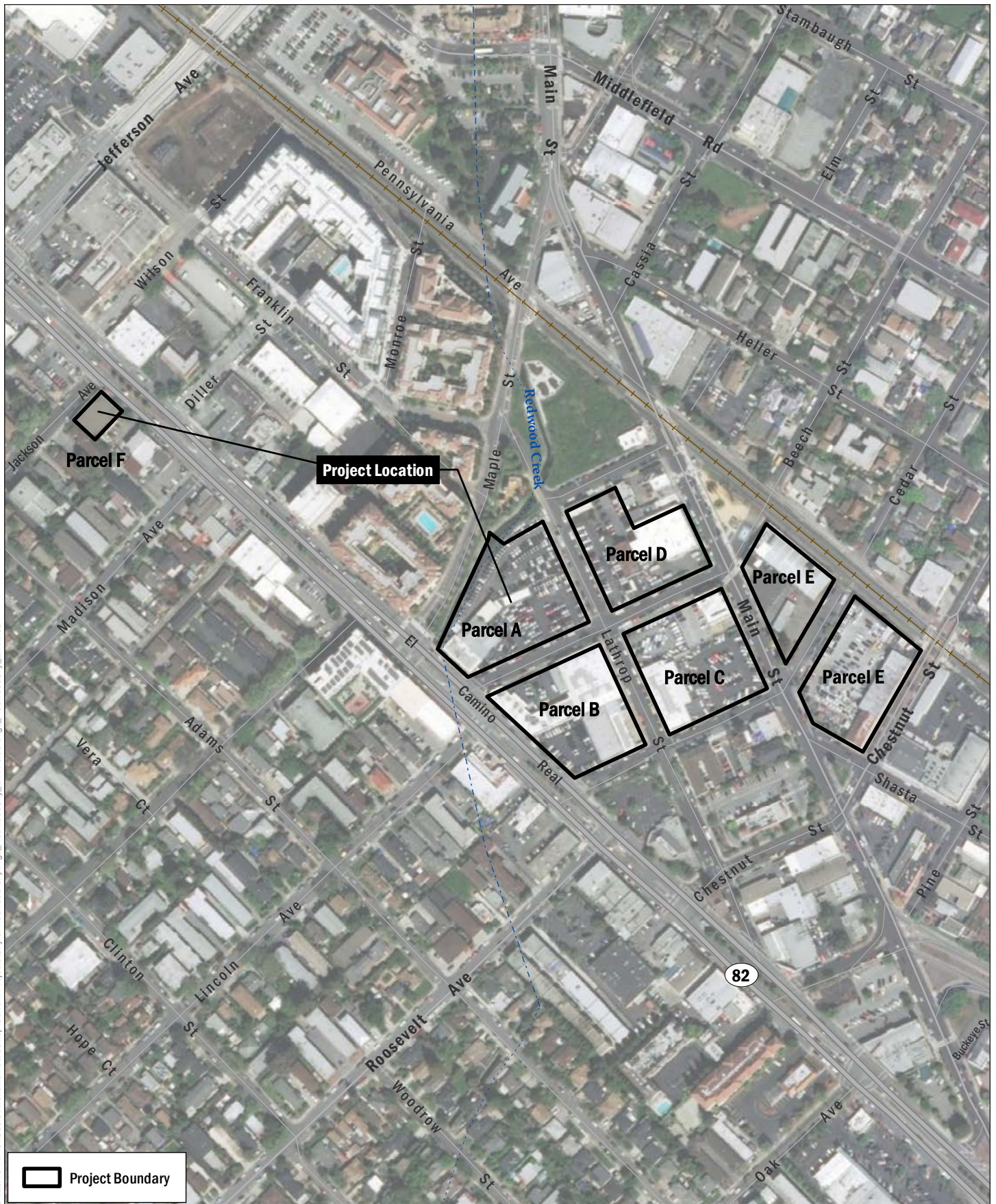
The proposed project would include one building each on Parcel A and F, developed with primarily residential uses; and five additional buildings on Parcels B through E, where the primary use would be commercial office space. Figure 2 shows the proposed building footprint and open space for Parcels A through F.

The proposed project would develop 291 multifamily residential units, including 252 units on Parcel A and 39 units on Parcel F. The project would also include approximately 550,000 square feet of office uses, an 8,500-square-foot childcare facility (not including 5,800 square feet of dedicated outdoor space), and 28,000 square feet of retail uses, including 19,000 square feet of ground-floor space on Parcel B designed to accommodate retail-entertainment uses. The approximately 40,000 square feet of public open space proposed throughout the site would include a public creek walk and a park at Shasta Street and Chestnut Street. The following general land uses would be constructed at each parcel:

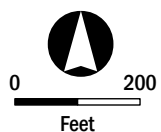
- Parcel A – multifamily residential uses and retail space, and public and private open space.
- Parcel B – retail and office space, along with a childcare facility, family-oriented entertainment/retail.
- Parcel C – office space, and private open space.
- Parcel D – office space, and private open space.
- Parcel E – office space, retail, and public and private open space.
- Parcel F – multifamily residential uses.



04/25/19 h:\C:\Users\hroko.kolke\Desktop\Current Projects\City of Redwood City\Figs\_RedwoodCity\_EIR\_Folder\Figs\_RedwoodCity\_EIR.indd



Data Source: ESRI, 2019.



## PROJECT SITE

South Main Mixed-Use Development Project  
City of Redwood City, California

FIGURE 1





Source: WRNS STUDIO, 2019.

## PROPOSED PROJECT SITE

South Main Mixed-Use Development Project  
City of Redwood City, California

FIGURE 2



## Required Approvals

City of Redwood City Discretionary Approvals. Project implementation would require the following discretionary approvals by the City of Redwood City:

- Use Permits
- Downtown Planned Community Permit
- Vesting Tentative Tract Map
- Abandonment of a segment of a public street (Shasta)
- Abandonment of a segment of a public street and conversion to a private street (Cedar)
- Acquisition of a City-owned parcel (1306 Main Street)
- Affordable Housing Plan
- Architectural Permit
- Tree Removal Permit
- Grading Permit
- State Density Bonus concessions and waivers

Approval of the above-listed discretionary approvals will also require certification of the EIR and adoption of a Mitigation Monitoring Reporting Program (MMRP). The project will also require approval of a number of ministerial approvals such as demolition, excavation, shoring, grading, encroachment, and building permits

Other Government Agency Approvals. The project could require review and/or approval from the Regional Water Quality Control Board (RWQCB) for a General Construction Storm Water Permit that will require preparation of a Stormwater Pollution Prevention Plan, and an encroachment permit from Caltrans for construction work with El Camino Real. Proposed pedestrian improvements over Redwood Creek may require permits from the U.S. Army Corps of Engineers, RWQCB, and California Department of Fish and Wildlife.

## EIR Purpose

The purpose of an EIR is to inform decision-makers and the general public of the environmental impacts of a proposed project that an agency (in this case, the City of Redwood City) may implement or approve. The EIR process is intended to: (1) provide information sufficient to evaluate a project and its potential for significant impacts on the environment; (2) examine methods (e.g., project-specific mitigations, uniformly applied development regulations) for avoiding or reducing significant impacts; and (3) consider alternatives to the proposed project.

In accordance with CEQA, the EIR will include the following:

- A summary of the project, its potential significant environmental impacts, and mitigations required to avoid or reduce those significant impacts;
- A project description;
- A description of the existing environmental setting, potential environmental impacts, and mitigations for the project;
- Alternatives to the proposed project; and
- Other environmental consequences of the project, including:
  - growth-inducing effects
  - significant unavoidable impacts
  - irreversible environmental changes
  - cumulative impacts, and
  - effects found not to be significant.

## EIR Scope

The City of Redwood City has determined that the project will require preparation of an EIR pursuant to the CEQA. Based on the attached Initial Study, the following environmental topics will be evaluated in the EIR:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Transportation

## Alternatives

The EIR will identify and compare a reasonable range of alternatives to the proposed project. Alternatives will be chosen based on their ability to avoid or reduce identified significant environmental impacts of the project while achieving most of the project objectives (CEQA Guidelines Section 15126.6).

## CD-Lindy Chan

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**Subject:** FW: Greystar 6 blocks

**From:** Briana

**Sent:** Saturday, August 10, 2019 12:03 AM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>

**Subject:** Greystar 6 blocks

Hi,

I saw on Nextdoor that the city is asking for feedback about this plan: <https://www.1601elcaminoreal.com/>

I have some serious concerns. I'm a homeowner in RWC and I am concerned about: traffic, the lack of parking shown or talked about anywhere in the plan and the idea that this giant corp is coming in and doing yet more development without really taking residents needs into account. The traffic here is worse than in the east bay and often than in SF. And this will clearly make it worse short and long term.

For me it's not just traffic. It's that my friends and family don't want to come visit because the traffic is so bad. That leaves me isolated and needing more use of services including mental health services. And I can't get even 20-30 miles away in less than an hour. This is actually crippling given that I'm disabled and can't drive for very long (I'm also 43, not a senior and a CEO of a company).

So please just don't do this at all.

Especially not without A LOT more community input. Moving forward with this as is has serious consequences all around.

Thank you!

Briana Cavanaugh and J Frechet (438 King St)

"Your task is not to seek for love,  
but merely to seek and find  
all the barriers within yourself  
that you have built against it." ~ Rumi

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

www.dot.ca.gov

*Making Conservation  
a California Way of Life.*

August 9, 2019

SCH: 2019070208

GTS# 04-SM-2019-00262

GTS ID: 16388

PM: SM-82-3.795

Lindy Chan, Senior Planner  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

**South Main Mixed-Used Development – Notice of Preparation (NOP)**

Dear Lindy Chan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Mills Park Center. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' Strategic Management Plan 2015-2020 aims, in part, to reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas emissions (GHG) in alignment with state goals and policies. Our comments are based on the July 9, 2019 NOP.

**Project Understanding**

The proposed project will provide mixed-use development on 6 blocks (8.3 acres) including 291 multifamily residential units (including 97 affordable units), 550,143 square feet of office, 27,737 square feet of retail, and an 8,563 square foot child care facility generally located between El Camino Real, Maple Street, Cedar Street and Main Street, within the Mixed-Use Corridor and Mixed-Use Live and Work zoning districts. An offsite development at 1304 El Camino Real would provide affordable housing associated with the development, which is within the Downtown Precise Plan area. The proposed project is adjacent to State Route 82.

**Traffic Operations**

1) With respect to the local and regional roadway system, please provide the following information for this project: trip generation, trip distribution, and trip assignment estimates.

2) There are three state roadway systems, which serve this project. These regional roadway systems are experiencing sustained congestion during AM peak and PM



peak hours.

In analyzing the impact of the project-generated trips on this sustained congestion, the project-generated trips should be added to the existing traffic volumes and the future scenario traffic volumes for the intersections and freeway ramps listed below.

- SR 82 El Camino Real & Jefferson Avenue intersection,
- SR 82 El Camino Real & Jackson Avenue intersection,
- SR 82 El Camino Real & Maple Street intersection,
- SR 84 Woodside Road on & off-ramp & Main Street/Pine Street intersection,
- SR 84 Woodside Road & Middlefield Road intersection,
- SR 84 Woodside Road & Broadway Avenue intersection,
- SR 84 Woodside Road & Veterans Boulevard intersection,
- US 101 & SR 84 Woodside Road on & off ramp Northbound & Southbound direction.

3) To avoid impacts such as on-ramp queues spilling back onto the city streets near state highway on-ramps, the project should provide on-ramp storage capacity evaluations.

4) The project should determine if there is adequate storage capacity available for the turning movements at the intersections and on the freeway off-ramps listed above, to determine if the queues spill back onto the freeway mainline. In conducting these evaluations, it is necessary to use demand volumes rather than output volumes or constrained flow volumes.

5) To avoid traffic conflicts such as inadequate weaving distances, queues spilling back onto the freeway, and uneven lane utilization, the project should evaluate the adequacy of freeway segments near the project.

6) To reduce the project trips the project should develop Transportation Demand Management (TDM) measures and incorporate them in the Draft Environmental Impact Report (DEIR).

### **Vehicles Miles Traveled**

Given the project's intensification of use and significant amount of vehicle parking spaces, the project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Parking should be reduced significantly. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Outdoor areas with patios, furniture, pedestrian pathways, picnic and

- recreational areas
- Transit and trip planning resources such as a commute information kiosk;
- Increasing access to common goods and services, such as groceries, schools, and daycare;
- Providing traffic calming;
- Real-time transit information system;
- Transit subsidies on an ongoing basis;
- Lower parking ratios;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Emergency Ride Home program;
- Employee transportation coordinator at employment sites;
- Provide ride-matching services;
- Provide a guaranteed ride home service to users of non-auto modes
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve VMT reduction goals, then reports should include next steps to take in achieving those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

### **Lead Agency**

As the Lead Agency, the City of Redwood City is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

### **Construction-Related Impacts**

Prior to construction, the City of Redwood City needs to coordinate with Caltrans to

develop a Transportation Management Plan (TMP) to reduce construction traffic impact to SR 82. Mitigation for significant impacts due to construction and noise should be identified in the DEIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications/>

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Michael McHenry at 510-286-5562 or michael.mchenry@dot.ca.gov.

Sincerely,



WAHIDA RASHID  
Acting District Branch Chief  
Local Development - Intergovernmental Review

c. State Clearinghouse

## CD-Lindy Chan

---

**Subject:** FW: 43 South Main Mixed-Use project

**From:** c sconzert

**Sent:** Thursday, August 08, 2019 9:00 PM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>;  
jonathan.fearn@greystar.com

**Subject:** 43 South Main Mixed-Use project

I am sickened by the overblown plans for the South Main project.

A 5-7 Story building, plus another 6-story building on **Parcel F** (which does not even show on the diagram "Figure 3 – Proposed Master Plan" posted on the Greystar Master Plan 4/25/19 ??

This is way too tall for our area, a total ripping out of the character of Redwood City. I can support increased housing and development, but this project is a Bull in a China Shop.

Very, very, very disappointed in our City Officials for even considering this.

Carol Sconzert

650-291-1023



## CD-Lindy Chan

---

**Subject:** FW: 1601 El Camino Real-Resident Input

---

**From:** ceasterbrook58

**Sent:** Wednesday, August 07, 2019 5:32 PM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>

**Subject:** 1601 El Camino Real-Resident Input

Ms. Chan,

I expect the City to protect surrounding residential neighborhood streets, including Redwood Avenue, from any/all traffic generated by the proposed project. We are already at the breaking point and the City's address to date has been woefully insufficient.

Thank you very much,

Cheryl Easterbrook

**CD-Lindy Chan**

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**Subject:** FW: Public Comment re Planning Comm. Item 6B

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**From:** Christopher Alan Sturken

**Sent:** Tuesday, July 30, 2019 6:40 PM

**To:** BCC-Michael Smith; GRP-Planning Commissioners

**Subject:** Public Comment re Planning Comm. Item 6B

Dear Planning Commission,

I applaud Greystar for increasing the percentage of affordable units from 22% to 33% of the total residential units in the South Main Mixed Use Project. The January 2018 proposal included 60 affordable units out of 272 units. The current proposal includes 97 affordable units out of 291 units. Please consider Greystar's efforts to respond to community needs by increasing the number of affordable units.

Thank you,  
Chris Sturken

**Subject:** FW: South Main Mixed-Use Development Project comment/clarification

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**From:** Roman, Isabella@DTSC

**Sent:** Thursday, August 08, 2019 10:19 AM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>

**Subject:** South Main Mixed-Use Development Project comment/clarification

Hello,

I represent a responsible agency reviewing the Draft Initial Study (IS) for the South Main Mixed-Use Development Project.

The link to the IS (<https://www.redwoodcity.org/city-hall/current-projects/development-projects?id=91>) doesn't include the Appendices. I am specifically interested in the HAZ Appendix- Site Phase I and/or the Phase 1 Environmental Site Assessments and Screening Level Investigation Reports mentioned on page 88. Would you please provide me with these documents?

It's unclear whether a cleanup plan is currently planned. The text states the following when referring to the elevated levels found in the Screening Level Investigation reports: "The report concludes that these areas are generally shallow in extent and would likely be excavated during the proposed redevelopment" (page 91). Elsewhere in the text, it is stated that the Site Mitigation Plan will implement measures such as excavation to achieve the plan's cleanup targets. The contamination may be removed in this way, however it should be ensured that the Site will have adequate confirmation samples to certify the contamination has been removed to appropriate levels. The text discusses post-excavation confirmation soil samples, however this doesn't discuss the frequency or depth of these samples. It is discussed that future Site users will be protected from the soil gas vapors emitted from the regional groundwater plume, with the potential of a vapor extraction system being used to prevent exposure. However, the text doesn't mention any post-excavation soil gas confirmation sampling. Due to the nature of the proposed development, including residential and childcare uses, the contamination at the Site needs to be adequately addressed for protection of future Site users.

Characterizing the Site prior to starting removal actions would be beneficial to minimize the potential for having to go back in and remove any missed contaminated areas or having to implement other removal measures or institutional controls. If the contamination is characterized and bounded prior to removal, this may minimize the chance of encountering any "leftover" contamination which will need to be addressed by a land use control and/or vapor extraction systems. The IS mentions that the railroad was not identified as a potential source of contamination in previous reports. Only one sample near the railroad has been taken and it wasn't analyzed for all constituents associated with railroad use. Without being able to review the sampling reports, it's difficult to know the locations and depths of samples that were previously taken. The IS mentions that contamination is present in shallow soils. Were deeper depths tested and found to be below screening levels? Or were they not tested and therefore it is only known that shallow depths are contaminated? Additionally, soil gas samples don't appear to have been taken yet. Being fully aware of present contamination before removal actions take place (instead of just confirming their absence after the fact) would also be helpful in regards to Site/worker safety (e.g. preparing the Health and Safety Plan (establishing action levels, contingency measures if contaminated material is encountered etc.)).

Section 4.9.2) d.) (starting on page 95) discusses the Cortese List. The text states that one Cortese List site is located on the project site, and five are immediately adjacent. There are no Cortese List sites on or near the project. There are no Cortese List sites in all of Redwood City. The full list of Cortese List sites can be found here:

[https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site\\_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+\(CORTESE\)](https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE))

The 6 sites currently discussed in the IS are Geotracker and Envirostor cleanup sites. These are different than Cortese List sites (see the link above for more information on Cortese List sites). For DTSC, Cortese sites are sites where DTSC has issued an order for cleanup. For IX.) d) on page 88, please consider changing it to “No Impact.” Please correct the text accordingly to show that there are no Cortese List sites on or adjacent to the Site. The discussion of the 6 overlapping or adjacent cleanup sites are helpful to include in the discussion to indicate potential contaminant contributions to the Site; however it should be corrected that these aren’t Cortese sites.

Please provide me with the reports mentioned above. Please clarify any of the above issues I pointed out and/or be sure to address them in the revised IS.

Thanks,

Isabella Roman  
Environmental Scientist  
Site Mitigation and Restoration Program  
Department of Toxic Substances Control  
700 Heinz Avenue Suite 200  
Berkeley, CA 94710  
(510)-540-3879

## CD-Lindy Chan

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**Subject:** FW: 1601 El Camino Project Scope & Comments

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**From:** DONNA CZARNECKI

**Sent:** Friday, August 09, 2019 2:32 PM

**To:** GRP-Planning Commissioners <PC@redwoodcity.org>; CD-Lindy Chan <lchan@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>

**Subject:** 1601 El Camino Project Scope & Comments

To everyone:

Thank you for giving the Redwood City residents the opportunity to participate in the Scope, design and Environmental Review by taking in consideration our many comments and concerns regarding this massive Downtown and El Camino Real project.

First:

1. This property includes the businesses Acura and Ford. I hope they can stay in Redwood City...they pay a lot in retail sales taxes to the City.
2. Another concern, Day Care is proposed in the Ford lot/space? At least it appears that way in this attached photo: I think the soil under an old auto repair shop should be toxic...too toxic for Child Care? Changing zoning for more housing should not be a standalone request, as requested by commissioner Bill Shoe. Hope the Planning Commission is going to request soil, air and water tests for contaminants and toxins before giving GreyStar any approvals. Grey Star should pay for the toxic clean up. Grey Star is a multibillion dollar company...tell them you have other interested suitors. You will...mark my words. Worse case... Ford stays there. But I know you'll be happy to not give in to a bully like Grey Star and RC residents will be proud of you.
3. Bring back rollerskating for the kids, the old building is part of this project...there is not enough entertainment for kids of all ages...just the theaters... Rollerskating is more popular than the old used run down, wire mesh&crumbling plaster structure, plastic molds, rocks for golf balls that don't bounce, mini golf in the stuffy airless Armory. 10 miles up the road on El Camino is #1 Golfland USA a Disneyland type outdoor experience ...with an Arcade for 2 hours of fun on the same site & ticket...in Sunnyvale.
4. I think more parking is needed. El Camino and Woodside road is jammed. What is GreyStar being asked to do to help with parking...cut the building height if they can't provide parking inside each structure and get cars off the streets.
5. Redwood City needs a sitdown Family restaurant on El Camino...MAX's is sorely missed. It provided a place for families to dine out, it provided Seniors with discounts and take out and I went there twice a week, breakfast/brunch with a friend or business associate, and take out for Thursday night football. Max's failed because they didn't change their small bar from old fashioned mixed hard liquor drinks to the huge selections of new beers on tap that millennials crave. All those residents on the West Side of El Camino have no where to go for a family sitdown dinner out. Even Chase is not going to invite clients to Panda Express for a lunch meeting. Nor will they want to go Downtown where it is already stand in line only.

Thank you,

Donna Czarnecki  
1260 Alameda de Las Pulgas  
Redwood City, CA 94061  
650-364-0815 h





*Sent Via Email: lchan@redwoodcity.org*

August 9, 2019

City of Redwood City, Planning Services  
Attn: Lindy Chan, Principle Planner  
1017 Middlefield Road  
Redwood City, CA. 94063

**Re: Notice of Preparation of South Main Mixed Use Project Environmental Impact Report  
(1601 & 1304 El Camino Real)**

Dear Ms. Chan,

As the applicant for the proposed “South Main Mixed-Use” project at 1601 and 1304 El Camino Real, we sincerely appreciate the City staff’s and AECOM’s time and efforts in conducting the environmental review of the project pursuant to the California Environmental Quality Act (CEQA). We also appreciate the opportunity to comment on the Notice of Preparation and Initial Study.

1. Existing Uses

We wish to highlight that, as an urban, infill site in close proximity to Caltrain, there are existing uses on the project site. We see that Section 2.2 of the Initial Study Project Description describes the existing uses. We would like to confirm that these existing uses will be factored into the impact analysis throughout the Environmental Impact Report (EIR) and technical studies such that the EIR will evaluate the project’s impacts in relation to impacts from the existing uses.

2. Tiering

In addition, there are a number of statutory and case law authorities that support the use of CEQA tiering<sup>1</sup>, exemptions and streamlining. We are not suggesting that the City redirect its efforts in preparing an EIR, but rather wish to request that the applicable mechanisms are identified as additional “layers” of CEQA authority.

At the outset, we’d like to highlight that many of the streamlining mechanisms are focused on projects located in proximity to transit. As identified in our prior submissions, the project (both from the main location at 1601 El Camino Real and the off-site location at 1304 El Camino Real)

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<sup>1</sup> CEQA strongly encourages tiering, which “shall be tiered whenever feasible, as determined by the lead agency.” (Pub Res C §21093(b)) Tiering off a program EIR allows individual projects to avoid duplicative reconsideration of basic policy considerations and broadly applicable mitigation that reduces impacts.

is located within ½ mile of the Redwood City Caltrain station, which is an existing major transit stop.

The project is also located within a Priority Development Area as established under Plan Bay Area 2040, the region's sustainable community strategy plan prepared pursuant to SB 375. Specifically, the project is located within the El Camino Real Corridor Priority Development Area, a "Mixed-use Corridor" Place Type. Accordingly, we request further consideration of tiering -- or "layering" -- from the Plan Bay Area EIR, particularly with respect to regional impacts associated with transit-oriented development in urban, infill locations already identified in the Plan Bay Area EIR. To this end, we have attached a summary of all of the significant and unavoidable impacts identified in the Plan Bay Area EIR as Attachment A.

Further, we note that Redwood City's General Plan Program BE-2 encourages the use of streamlining for residential mixed-use projects, urban infill, and "Transportation Priority Projects" as provided under State law. (General Plan, p. BE-84) Given the project's mixed use, urban infill, transit-oriented nature, and based on the project's consistency with the City's General Plan and Zoning, we request further consideration of tiering from the General Plan EIR as well. Specifically, we request consideration of tiering from the General Plan EIR, as previously identified in our January 2019 submittal.

Thank you for your consideration and we look forward to the continuation of the environmental review process.

Sincerely,



Jonathan Fearn  
Sr. Director Development, Greystar

Cc: Troy Vernon, Greystar ([tvernon@greystar.com](mailto:tvernon@greystar.com))  
Raul Tamez, Greystar ([raul.tamez@greystar.com](mailto:raul.tamez@greystar.com))  
Chelsea Maclean, Holland & Knight LLP ([chelsea.maclean@hklaw.com](mailto:chelsea.maclean@hklaw.com))  
Tamsen Plume, Holland & Knight LLP ([tamsen.plume@hklaw.com](mailto:tamsen.plume@hklaw.com))

## Attachment 1

## Plan Bay Area EIR

### Previously Identified Significant and Unavoidable Impacts

#### 3.2.2 Significant Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a less-than-significant level. Chapter 2 of this EIR identifies the following significant unavoidable impacts of the proposed Plan. As stated in Chapter 2, to the extent that an individual project adopts and implements all feasible mitigation measures described for each significant impact, many of the impacts listed below would be reduced to a less-than-significant level. However, MTC/ABAG cannot require local implementing agencies to adopt most of the mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, several impacts have been identified as significant and unavoidable for purposes of this program-level review. Where an impact below has been determined to be significant and unavoidable notwithstanding application of mitigation at the project-level, this is noted below in parentheses. Projects taking advantage of CEQA Streamlining provisions of SB 375 (Public Resources sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described in this EIR, as necessary and feasible to address site-specific conditions.

#### TRANSPORTATION

- ▲ Impact 2.1-3: Implementation of the proposed Plan could result in a significant increase in per capita VMT on facilities experiencing level of service (LOS) F compared to existing conditions during AM peak periods, PM peak periods, or during the day as a whole (LOS F defines a condition on roads where traffic volumes exceed capacity, resulting in stop-and-go conditions for extended periods of time). A significant increase in LOS F-impacted per capita VMT is defined as greater than 5 percent.
- ▲ Impact 2.1-7: Implementation of the proposed Plan could cause a disruption to the ongoing operations of the applicable regional or local area transportation system due to construction activities.

#### AIR QUALITY

- ▲ Impact 2.2-2: Implementation of the proposed Plan could result in a substantial net increase in construction-related emissions.
- ▲ Impact 2.2-3: Implementation of the proposed Plan could result in a net increase of emissions of criteria pollutants from on-road mobile and land use sources compared to existing conditions, including emissions of ROG, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, as the SFBAAB is in non-attainment for ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. (This impact cannot be reduced to less than significant with feasible mitigation measures.)
- ▲ Impact 2.2-5: Implementation of the proposed Plan could result in a net increase in sensitive receptors located in Transit Priority Areas (TPA) where: (a) TACs or PM<sub>2.5</sub> concentrations result in cancer risk levels greater than 100 in a million or a concentration of PM<sub>2.5</sub> greater than 0.8 µg/m<sup>3</sup>; or (b) TACs or PM<sub>2.5</sub> concentrations result in noncompliance with an adopted Community Risk Reduction Plan. (This impact cannot be reduced to less than significant with feasible mitigation measures.)



- ▲ Impact 2.2-6: Implementation of the proposed Plan could result in changes in TAC and/or PM<sub>2.5</sub> exposure levels that disproportionately impact minority and low-income populations. (This impact cannot be reduced to less than significant with feasible mitigation measures.)

#### LAND USE AND PHYSICAL DEVELOPMENT

- ▲ Impact 2.3-1: Implementation of the proposed Plan could displace substantial numbers of existing residents or businesses.
- ▲ Impact 2.3-2: Implementation of the proposed Plan could physically divide an established community.
- ▲ Impact 2.3-4: Implementation of the proposed Plan could directly or indirectly convert substantial amounts of important agricultural lands and open space (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) or lands under Williamson Act contract to non-agricultural use.
- ▲ Impact 2.3-5: Implementation of the proposed Plan could directly or indirectly result in the loss of forest land, conversion of forest land to non-forest use, or conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production.

#### CLIMATE CHANGE AND GREENHOUSE GASES

- ▲ Impact 2.5-3: Implementation of the proposed Plan could substantially conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of GHGs.
- ▲ Impact 2.5-5: Implementation of the proposed Plan could result in a net increase in transportation projects within areas projected to be regularly inundated by sea level rise by midcentury. (This impact cannot be reduced to less than significant with feasible mitigation measures.)
- ▲ Impact 2.5-6: Implementation of the proposed Plan could result in an increase in land use development within areas regularly inundated by sea level rise by midcentury. (This impact cannot be reduced to less than significant with feasible mitigation measures.)

#### NOISE

- ▲ Impact 2.6-1: Implementation of the proposed Plan could result in exposure of persons to or generation of temporary construction noise levels and/or ground vibration levels in excess of standards established by local jurisdictions or other applicable regulatory agencies.
- ▲ Impact 2.6-2: Implementation of the proposed Plan could result in long-term permanent increases in traffic-noise levels that exceed applicable thresholds.
- ▲ Impact 2.6-3: Implementation of the proposed Plan could result in long-term permanent increases in transit noise levels that exceed applicable thresholds.
- ▲ Impact 2.6-4: Implementation of the proposed Plan could result in long-term permanent increase in transit-vibration levels that exceed applicable thresholds.
- ▲ Impact 2.6-5: Implementation of the proposed Plan could result in exposure of sensitive receptors to new or additional stationary noise sources in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies.
- ▲ Impact 2.6-6: Implementation of the proposed Plan could result in exposure of people residing or working in the planning area to excessive noise levels where an airport land use plan is adopted or, where such a plan has not been adopted, within two miles of a public airport, public use airport, or private airstrip.

**BIOLOGICAL RESOURCES**

- ▲ Impact 2.9-1a: Implementation of the proposed Plan could have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- ▲ Impact 2.9-2: Implementation of the proposed Plan could have a substantial adverse effect on riparian habitat, federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal), or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, through direct removal, filling, hydrological interruption, or other means.
- ▲ Impact 2.9-3: Implementation of the proposed Plan could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites.
- ▲ Impact 2.9-5: Implementation of the proposed Plan could have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

**VISUAL RESOURCES**

- ▲ Impact 2.10-1: Implementation of the proposed Plan could have a substantial adverse effect on a scenic vista.
- ▲ Impact 2.10-3: Implementation of the proposed Plan could substantially degrade the existing visual character or quality of the site and its surroundings.
- ▲ Impact 2.10-4: Implementation of the proposed Plan could add a visual element of urban character to an existing rural or open space area or add a modern element to a historic area.
- ▲ Impact 2.10-5: Implementation of the proposed Plan could create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

**CULTURAL RESOURCES**

- ▲ Impact 2.11-1: The proposed Plan could cause a substantial adverse change in the significance of a historic resource as defined in Guidelines Section 15064.5 or eliminate important examples of major periods of California history.
- ▲ Impact 2.11-2: The proposed Plan could cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5 or eliminate important examples of major periods of California history or prehistory.
- ▲ Impact 2.11-3: The proposed Plan could have the potential to destroy, directly or indirectly, a unique paleontological resource or site or unique geologic feature.
- ▲ Impact 2.11-4: The proposed Plan could have the potential to disturb human remains, including those interred outside dedicated cemeteries.
- ▲ Impact 2.11-5: The proposed Plan could cause a substantial adverse change in the significance of a TCR as defined in PRC Section 21074.

**PUBLIC UTILITIES AND FACILITIES**

- ▲ Impact 2.12-1: Implementation of the proposed Plan could result in insufficient water supplies available to serve development implemented as part of the Plan from existing entitlements and resources.
- ▲ Impact 2.12-3: Implementation of the proposed Plan could require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts.
- ▲ Impact 2.12-4: Implementation of the proposed Plan could require or result in the construction of new or expanded water and wastewater treatment facilities, the construction of which could cause significant environmental effects.
- ▲ Impact 2.12-5: The proposed Plan would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and comply with federal, state, and local statutes and regulations related to solid waste.

**HAZARDS**

- ▲ Impact 2.13-4: Implementation of the proposed Plan could result in projects located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

**PUBLIC SERVICES AND RECREATION**

- ▲ Impact 2.14-1: Implementation of the proposed Plan could result in the need for new or modified facilities, the construction of which causes significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools, police protection, fire protection, disaster response, emergency medical, and other public facilities.

## CD-Lindy Chan

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**Subject:** FW: Greystar proposed project in the Salt Flats off Woodside Road

-----Original Message-----

From: helene hollander

Sent: Thursday, August 08, 2019 5:27 PM

To: CD-Lindy Chan <lchan@redwoodcity.org>

Cc: citycouncil@redwoodcity.org

Subject: Greystar proposed project in the Salt Flats off Woodside Road

Please do not approve this project. There are many reasons, here are a few;

- \* there's not enough housing, only a token versus 2500 jobs.

- \* there is no proof that traffic has been reduced by building along The railroad tracks, in fact just by driving around traffic has greatly increased since the Greystar projects have been completed as well as indigo and Marston.

- \* even with the addition of 10% below market housing units, this is not even a dent in what is needed. Each one of these housing complexes when they first assign the BMR residents has more than 1000 people applying for those apartments (for a total of 30 apartments average.) And there is no method of assigning those units that makes any sense which is an issue that should be addressed before anymore housing is built. A lottery and then a list of more than 600 makes it impossible for people to find housing. They have to go to each individual Apartment building and sign up. And they are not allowed to from the very beginning because the lists are closed after the initial lottery. San Mateo county supervisors I think are in charge of below market housing but Redwood City Council knows nothing about how this whole thing works. Our mayor doesn't understand what this is. Before any new housing is developed, a new method of lower middle-class housing needs to be created.

- \* assigning this project to Greystar makes no sense. Have you read The consumer feedback from people that live in his buildings? He has the worst feedback I have ever seen of any developer. He got away with not putting any below market housing in more than 1000 apartments that he built in Redwood City. Only now is he doing anything about that and from what I understand they're only be 67 apartments that are below market in the newest building you have approved. Yes he is a cash cow because he sells the buildings as soon as he rents out a certain percentage. I understand he leaves behind major construction errors for the new owners to deal with and the tenants to tolerate.

- \* we do not need any more industry that brings Higher income jobs which cause rents to skyrocket, which is happening now , Exacerbated by the housing market. Rents are up to about \$4000 for a one bedroom in Redwood City and the Greystar projects. It is my understanding that he keeps the rents high and offers one or two months free. Once he sells the building or year later when their lease is up, the tenant is faced with not just a 7% increase, but the money they saved in the first year's lease is added back in so the rent can go up exorbitantly.

Please reconsider this. There's got to Better solutions. There Are so many people, workers that are being priced out of the market as well as senior citizens being forced to relocate. It's got to stop.

Sent from iPhone. Helene



**Subject:** FW: Development Project - South Main Mixed Use

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**From:** Jim Coffman  
**Sent:** Tuesday, July 30, 2019  
**To:** GRP-Planning Commissioners; GRP-City Council  
**Subject:** Development Project - South Main Mixed Use

Honorable Members of the City Council and Planning Commission

I am not exactly enamored with the large scale developments being built in Redwood City. The buildings themselves are all very attractive, bring some sort of a new vibrancy to the areas they are being built and provide some sort of foreseeable future in terms of housing. This is the direction that the City of Redwood City has chosen to go and if I want to continue to live in the City, I will adapt.

However, please consider in the woefully inadequate parking in the massive South Main Mixed Use project. Just a brief look at the plans on the City website shows that the developer has not considered that people drive cars to work, home, daycare, dinner, etc. now, and will do so far into the future. Eliminating, reducing the size, or providing alternatives such as ill-fated puzzle parking or valet services in an effort to increase square footage that is sellable is something that you, members of the Planning Commission and ultimately, you members of the City Council can control.

For example: Parcel F is a great idea to replace and increase affordable housing- 38 affordable units plus a manager's apartment. For this building, I count at least 38 resident cars. Let's add another 19 for those families who have two or more cars or drive a work truck home and the total increases to 57. From the documents, the developer is providing only 12 spaces which includes 1 EV charging spot and 1 handicapped spot. According to the site plan drawings I see spaces that appear to be used for two vehicles each. Your question should be where are the other vehicles associated with Parcel F going to park? (The answer, of course, is in the neighborhoods surrounding.)

The same analysis should be used for the larger parcels in the main development area. You might want to do some subtraction to the total number of parking spaces on Table 2.6.

For example: For Parcel B, does the 295 office parking spaces include the 15 motorcycle spaces? If so, the total for cars is actually 280. If you subtract the 29 carpool and 25 EV spaces, that brings the total number of spaces available to the solo driver (which is what most of us are - whether you like to hear that or not) to 223. I don't think the developer would include the bicycle

parking in the total number of parking places, but you never know. Add the public and daycare parking to the mix and the parking space math gets even fuzzier.

You can see for yourselves how the numbers play out with the workers per square footage, the staff of the daycare and retail establishments and the number of parking spaces available. These vehicles will have to go somewhere and the answer, of course, is in the neighborhoods.

Please pardon the length of this email. I'll leave issues regarding the increased traffic on our streets to some other letter writer. Now, is the time to fix this because once built, it's here to stay. Thank you for your service to the community.

Jim Coffman  
1109 Virginia Avenue

## CD-Lindy Chan

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**Subject:** FW: Environmental and site concerns related to 1304 El Camino and South Main Mixed-Use Buildings  
**Attachments:** Issue with additional construction surrounding 1355 El Camino Real 94063.pdf

**From:** Kate Lowry  
**Sent:** Thursday, August 08, 2019 8:32 PM  
**To:** GRP-City Council <council@redwoodcity.org>; CD-Lindy Chan <lchan@redwoodcity.org>  
**Subject:** Environmental and site concerns related to 1304 El Camino and South Main Mixed-Use Buildings

Hi Lindy,

Thanks so much for being willing to consider all of our input on behalf of the city for the proposed Greystar developments off of El Camino Real and Maple St. I live in the Huxley Building with my family along with many others, and wanted to talk specifically about the environmental and construction monitoring requirements for Greystar and the viability of the Parcel F 1304 El Camino Development.

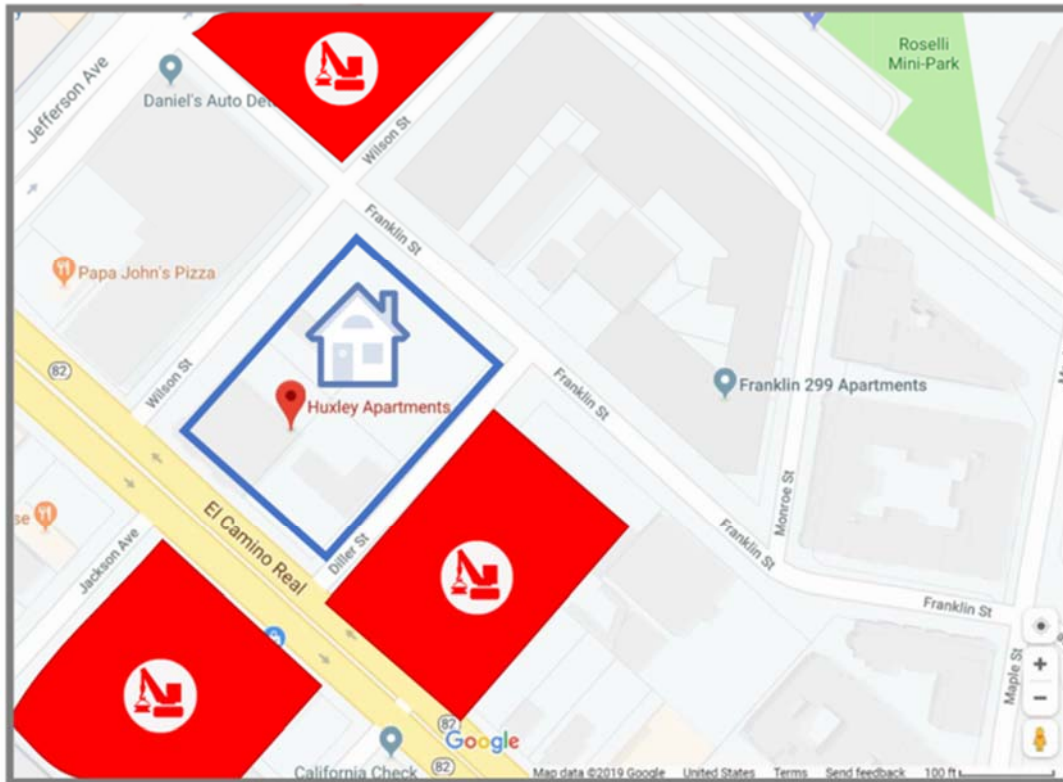
Greystar has been building a full new building at 1405 El Camino Real next to our building at 1355 El Camino Real, for the entire time we have lived here. They have also been finishing the Elan building, which sits catty corner from ours on Franklin. In that time, we've had to report major issues with noise, dust, and work hours.

- The jackhammering, drilling, pouring, and dumping sounds have been at an average of **70 decibels** from inside our apartment for the last eight months. It's impossible to open our windows during the week, because of the huge amounts of noise, and large amounts of dust. The construction site is only **~30 feet** from our building, but no one inside our building has received any instructions to wear sound protection when windows and doors are open next to the active construction site.
- It's been impossible to sleep - we've seen construction start before 7am over 20 times, which we have done our best to report - and the constant dust has meant that despite having a top of the line air purifier in our home, I've been treated for sinus infections and breathing problems that I did not have before over 4x just since living here.
- The construction crews are not always friendly, and in three instances have blocked the exit from our parking garage. They leave debris and litter, and Diller, Franklin, and Wilson roads are covered in deep track marks from heavy machinery and pot holes. Residential street parking is absorbed by the workers who need a place to sleep. We don't have sidewalks all the way around our building, and the piles of dirt left make it hard to navigate things like wheelchairs or strollers. Our apartments do not have access to hoses to wash our vehicles, which are always coated in a layer of dust in the open air parking garage. It's hard for pets to find safe places to walk when they go out at night.

Please make sure that Greystar is held to **higher environment and crew standards** for the Maple Street development, ensure that **weekly monitoring takes place**, and someone within the city management is **visible, and accessible to residents** of the neighboring buildings. Because our own apartments are **managed by Greystar** (as are our neighbors Elan RWC and Franklin 299), the building management have a very **strong disincentive** to ignore our complaints as residents and have been unwilling to help resolve issues as reported.

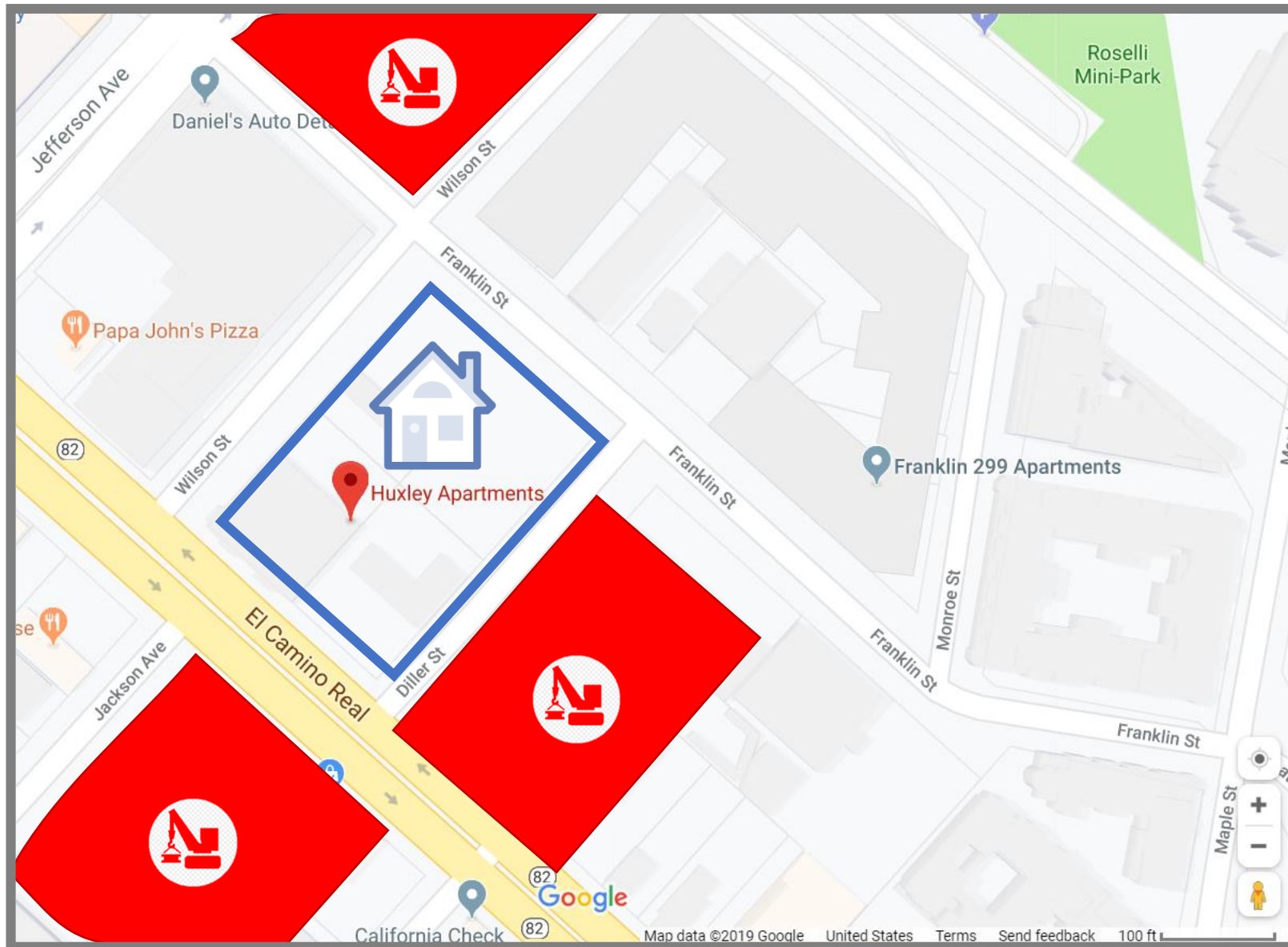
Regarding **Parcel F**, I question why they want to segregate low income housing away from new, high end developments. I don't feel like that reflects the diversity of our communities in a positive way.

But more than that, I am concerned that if that building breaks ground, we'll have to move out of our apartment. Because of the Huxley building's location, by the time the new development would open we will have been exposed to **5+ years of serious construction on direct neighboring buildings** causing dust, noise, non-residential traffic, **because of the progressive timing of the Elan Redwood City, 1405 El Camino, and the 1304 El Camino developments.** The city should not have allowed Greystar to open Huxley as a residential building if it is going to effectively be **surrounded by active construction sites** for such a long time. As residents we are tired of having dust in our eyes, dirty windows we can't see out of, and getting sinus and asthma issues. Not to mention the huge amounts of noise that make it hard to work from home or sleep past 7am on any day of the week except Sunday. Please, **take some current air samples from outside our building next to the construction site at 1405 El Camino.** Then, imagine if the dust level were to double from the addition of a second site on a neighboring building on El Camino.



**If at all possible, please increase the environmental and crew standards for the buildings A-D development as mentioned above to be as stringent as possible. For Parcel F, please either delay construction by a few years, integrate the affordable housing into the Maple Street developments, or find a new site for Greystar to consider to help us return to a healthier and safer standard of living at 1355 El Camino Real (for example, 1612 El Camino is currently vacant, also a former auto shop, and is directly across from the proposed main A-D development - would the city and Greystar be willing to explore it as a potential F site alternative?)**

Thanks for your time,  
Kate Lowry





## CD-Lindy Chan

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**Subject:** FW: 1601 El Camino proposed development

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**From:** Kathleen McLaughlin  
**Sent:** Friday, August 09, 2019 6:11 PM  
**To:** CD-Lindy Chan <lchan@redwoodcity.org>  
**Subject:** 1601 El Camino proposed development

Hello Lindy Chan,

I am writing regarding the proposed development by GreyStar at 1601 El Camino in Redwood City. A few comments regarding the development:

- 1) This proposal takes up at least 5-6 prime blocks along our main street of El Camino, and the public has not had much time to consider it. I try to stay involved in city matters, but have only heard of this proposal this week. The public needs time to absorb all the construction going on, particularly on major blocks.
- 2) Zoning change: The developer is proposing major changes to zoning and eliminating important businesses, including car dealerships which support much of the tax base in Redwood City. We have been chipping away at the light-industrial zoning which is needed for Redwood City's economic health. Most of Redwood City is already zoned for housing, and there is still most of downtown for office space. Let's keep light-industrial zoning in this part of town.
- 3) Loss of Streets: The developer is requesting that Redwood City give up at least two streets for this project; we must NOT give up our streets to the developer. We (the public) have a right to our streets for multiple uses, including as potential parks. None of our streets is superfluous. Our streets are an important resource that must NOT be given away (or sold!) to developers.
- 4) Perry's Feed Shed: The developer wants to tear down an historic building, described as "Perry's Feed Shed." We must not allow this building to be torn down for the convenience of a developer. Even if they say they want to build a "replica"... you cannot replicate history. Our city's history is too important to allow builders to knock historic structures down. So much of the charm of Redwood City is in our remaining historic buildings.
- 5) Loss of recreation: The Redwood Rollerskating site had for at least 50-60 years been used for public recreation. We want use of this site to remain for similar recreation, for all ages, including children. Other cities, including San Mateo, have made this a requirement for builders. We must find a way to keep this for public recreation. We have already lost Marine World, Castle Golf & Games, at least 2-3 bowling alleys, and more. We have not added parks/recreation downtown to compensate for those losses, despite many thousands of new people living here. Tastes in recreation change over time, yet our city still needs it. Unfortunately, we must specifically zone for it/ require it of developers because they don't live here and don't care. But we do care. Maybe we could have a public roof garden with skating, etc. like San Francisco's TransBay ?
- 6) Townhouses/flat: Generally, most new housing built downtown should be resident-owned, rather than rented. We have been building rental housing downtown but need more townhouses and flats, for balance. There is a huge need in Redwood City for affordable townhouses and flats. The Habitat for Humanity building, or something similar, can be a model.

6) Also, I have a huge, general concern with GreyStar itself. I believe they already own about 5 blocks of housing just down the street from this proposal. They have a monopoly for rental housing. This is an unhealthy situation for Redwood City. I wish the City Council and City Manager, etc. would look into how this corporation is influencing Redwood City, the danger of one company controlling so much property, and how it affects the city financially.

Thank you for your consideration of my concerns,

Kathleen McLaughlin,  
Redwood City resident

## CD-Lindy Chan

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**Subject:** FW: large development project

**From:** Kathy Warne

**Sent:** Friday, August 09, 2019 12:00 PM

**To:** CD-Lindy Chan <lchan@redwoodcity.org>; GRP-City Council <council@redwoodcity.org>

**Subject:** large development project

Dear Ms. Chan,

I've heard on Nextdoor of a large development project planned for downtown Redwood City. I've looked over the proposal at <https://www.redwoodcity.org/city-hall/current-projects/development-projects?id=91> and I must say it seems like a very large project. I'm a longtime Redwood City resident (13+ years) and my concerns are the following:

What is the cost to the City of this project, in terms of increased traffic, increased population due to the housing, etc.?

How will the City cope with all those extra commuters coming in every day? They can't all take CalTrain.

What will be the quality of life effect? These are very large modern buildings, will they fit in with the character of the city?

Thank you,

Kathy Warne

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Kathy Warne

(650) 804-6254 (cell)

[katherinewarne@gmail.com](mailto:katherinewarne@gmail.com)

## CD-Lindy Chan

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**Subject:** FW: South Main project (Greystar 5)

**From:** Kris Johnson  
**Sent:** Friday, August 09, 2019 9:58 AM  
**To:** CD-Lindy Chan <lchan@redwoodcity.org>  
**Subject:** South Main project (Greystar 5)

Hi Lindy,

Here are considerations as part of the scoping for the South Main EIR.

Regards,  
Kris Johnson

### **Traffic Intersections that need to be studied west of ECR**

- \* Woodside / ECR
- \* Woodside / Hudson
- \* Woodside / Massachusetts
- \* Woodside / 280
- \* Roosevelt ECR
- \* Roosevelt / Hudson
- \* Roosevelt / Alameda
- \* Jefferson / ECR
- \* Jefferson / Hudson
- \* Jefferson / Alameda
- \* Farmhill / 280
- \* Edgewood / Alameda
- \* Edgewood / 280
- \* Hopkins / Hudson
- \* Hopkins / Alameda

### **General Plan**

A recent article from the SMDJ stated that Redwood City has over 10M square ft of office space in various stages of the development queue since the General Plan was adopted in 2010. How does the addition of the ~550k of office space align with the overall goals for office space as outlined in General Plan? Where do we stand to date in regards to that objective? What other office projects have been proposed, approved and/or constricted since the General Plan was adopted in 2010?

### **Headcount**

Given there is no guarantee who the tenant will be and the wide range of square footage required per employee, I believe the EIR should be based off each of the following three scenarios:

- 250 sq ft / employee
- 200 sq ft / employee
- 150 sq ft / employee

### **Population and Housing**

Given the tremendous impact the South Main project would have on our jobs/housing imbalance, the EIR should include a detailed report similar to the one linked below:

[https://www.menlopark.org/DocumentCenter/View/10293/Ch03-12\\_PopulationHousing\\_Draft-EIR](https://www.menlopark.org/DocumentCenter/View/10293/Ch03-12_PopulationHousing_Draft-EIR)

### **Traffic**

Given the ongoing and incomplete transition by agencies from LOS to VMT in their policies and practice, I believe we should be using LOS for this project to measure impacts on traffic.

**Jobs/Housing**

Given the dire need for housing in our community, the EIR should look at multiple scenarios for the percentage of jobs/housing for this project:

100% jobs

100% housing

50/50 split

75% jobs / 25% housing

75% housing / 25% jobs



**CD-Lindy Chan**

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**Subject:** FW: South Main project

Begin forwarded message:

**From:** Kris Johnson  
**Date:** July 29, 2019  
**To:** Kevin Bondonno  
**Subject:** Fwd: South Main project

Hello Kevin,

Given the incredible impacts that this project will have on the jobs/housing imbalance that cannot be mitigated, I would love to see something as detailed as this included in the EIR for the South Main project.

Thanks for your consideration,  
Kris.

[https://www.menlopark.org/DocumentCenter/View/10293/Ch03-12\\_PopulationHousing\\_Draft-EIR](https://www.menlopark.org/DocumentCenter/View/10293/Ch03-12_PopulationHousing_Draft-EIR)

Shared via the [Google app](#)

Sent from my iPhone

NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department

1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691 Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>  
Twitter: @CA\_NAHC



July 23, 2019

Lindy Chan  
Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063



RE: SCH# 2019070208 South Main Mixed-Use Development Project, San Mateo County

Dear Ms. Chan:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).



7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
  - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
  - a. Avoidance and preservation of the resources in place, including, but not limited to:
    - i. Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i. Protecting the cultural character and integrity of the resource.
    - ii. Protecting the traditional use of the resource.
    - iii. Protecting the confidentiality of the resource.
  - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
  - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email

address: [Gayle.Totton@nahc.ca.gov](mailto:Gayle.Totton@nahc.ca.gov).

Sincerely,



for

Gayle Totton

Associate Governmental Program Analyst

cc: State Clearinghouse

## CD-Lindy Chan

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**Subject:** FW: Concerns for New Construction at 1304 El Camino

**From:** Peter Hurford

**Sent:** Thursday, August 08, 2019 8:55 PM

**To:** GRP-City Council <council@redwoodcity.org>; CD-Lindy Chan <lchan@redwoodcity.org>

**Subject:** Concerns for New Construction at 1304 El Camino

Hi Lindy,

Thank you for considering our input on the proposed Greystar development at 1304 El Camino. I have lived at 1355 El Camino for the past six months where they already have been actively developing 1405 El Camino as well as finishing up the Elan building at 1 Franklin. The existing two buildings being under construction has already created a considerable amount of noise, dust, and traffic that makes it difficult to be a resident. I am worried that a third construction would make this even worse for residents.

Worse, it seems that existing construction does not currently abide by rules to not start construction until 7am. 7am construction is already very early and disruptive, but I have seen them start construction as early as 6am at least a dozen times - preventing me from getting a good sleep. I also worry about all the dust and it makes it hard to keep the windows open or go outside at certain times. The construction also blocks sidewalks and roads that make it hard to get in and out of our building. Complaints have gone nowhere.

I'm worried that this constant construction will end up being too much for us who have to live in the literal center of it for many years and were not made aware of all these construction plans upon move in. At the very least, the city should do more to ensure that construction does not happen before 7am and dust and construction traffic is kept to a minimum.

Thanks,  
Peter Hurford

## CD-Lindy Chan

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**Subject:** FW: 1601 El Camino Real "South Main Mixed-Use"

**From:** Philip Vitorino  
**Sent:** Friday, August 09, 2019 2:06 PM  
**To:** CD-Lindy Chan <lchan@redwoodcity.org>  
**Subject:** Fwd: 1601 El Camino Real "South Main Mixed-Use"

Hi Lindy,

I am a homeowner who lives on Oak Street and Clinton, 2 blocks from the proposed development at 1601 El Camino Real. I want to speak in favor of this redevelopment while also recommending ways to mitigate potential concerns and maximize benefits.

I have attended all of the community events that Greystar has sponsored to get feedback regarding the project.

I just wanted to share a few thoughts regarding the project.

- 1) Currently, the area under consideration is extremely under-utilized. The area consists of parking lots and shuttered business that are neither inviting or feel particularly safe. I think the area is ripe for redevelopment
- 2) I feel the addition of housing and office near transit corridors should be prioritized. I think the developers could provide a shuttle service to and from caltrain as it could be a nice addition to further encourage residents/workers in the area to use public transport. Is this something that could be recommended?
- 3) I think creating a better pedestrian experience will increase the people visiting downtown by foot (myself included) if not having to walk through the current dilapidated and eerily vacant streets. I think encouraging them to include as much 'public park space' as possible would be appropriate.
- 4) Of course, like others, I think an appropriate EIR to understand traffic and environmental impacts is key. I trust the independent consultants to give their assessment, and the council to weigh those results when making a recommendation about the scale/scope of the proposal. That said, I think its a great opportunity to dramatically improve the cityscape at a key southern entry point to downtown.
- 5) The inclusion of a new affordable housing development on El Camino is an added bonus to the project that will help make progress on the el camino real corridor plan and also add more lower income housing stop to keep our teachers / city workers local.

Thanks for all the work you do  
Phil

## CD-Lindy Chan

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**Subject:** FW: El Camino mega project

-----Original Message-----

From: Ricardo Sanchez

Sent: Wednesday, August 07, 2019 6:00 PM

To: CD-Lindy Chan <lchan@redwoodcity.org>

Cc: GRP-City Council <council@redwoodcity.org>

Subject: El Camino mega project

I'm writing to you about the proposed development where the Ford and Acura dealerships are.

I live roughly five blocks west of the proposed project. I have two big concerns, only one of which had been addressed.

The first is the loss of the roller rink. I understand the development would have space for places like the roller rink, but it isn't a guarantee we get something comparable. We have lost our bowling alley, the miniature golf, and with the roller rink, one of the last indoor activities we have in town. Rwc had become an increasingly family unfriendly place. I'd like a commitment to bring indoor family activities to the site.

My second concern is parking. I bought my house about 15 years ago. At the time I could park my car in front of the house most days. That is no longer true. With each new apartment complex, more cars get pushed into the neighborhood due to insufficient parking at the apartments. Today, my block is lined with cars 24 hours a day. When I've talked to the people parking on my block, many of them live in the apartments across from the Acura dealership. If there isn't at least two spots per apartment, it's not enough. There are days that my wife can't get out of our driveway because cars have encroached on the driveway too far on both sides. What's worse is that this isn't something the police will do anything about.

I don't object to the apartments. Just please please please address the parking. I know the city council seems to think there are no parking issues in rwc, but I had to park four blocks away from my house tonight. Please don't make me park farther away.



Kelly M. Rem  
Attorney at Law

E-mail: krem@lozanosmith.com

August 9, 2019

**By U.S. Mail & E-Mail: lchan@redwoodcity.org**

Ms. Lindy Chan, Principal Planner  
City of Redwood City, Planning Services  
1017 Middlefield Road,  
Redwood City, CA 94063

Re: Response of Sequoia Union High School District to Notice of Preparation of an Environmental Impact Report for the South Main Mixed-Use Project

Dear Ms. Chan:

This office represents Sequoia Union High School District ("District"). On behalf of the District, we are hereby submitting comments regarding the Notice of Preparation of an Environmental Impact Report ("NOP"), which environmental impact report ("EIR") the City of Redwood City ("City") plans to prepare for the project to be located on five contiguous blocks totaling 8.30 acres between El Camino Real, Maple Street, Cedar Street, and Main Street ("Parcels A-E"), and one separate, 0.15-acre block located at 1304 El Camino Real (at Jackson Avenue) ("Parcel F"), in Redwood City, California (collectively, the "Project"). Specifically, this letter responds to the City's invitation to submit comments on the Initial Study prepared for the Project, and the proposed scope and content of the EIR.

According to the Initial Study and NOP, the proposed Project, sponsored by Greystar GP II, LLC ("Developer"), will consist of the demolition of existing auto storage and repair, restaurant, and office uses, and the construction of 291 multi-family residential units, 550,000 square feet ("sf") of office uses, an 8,500 sf childcare facility, and 28,000 sf of retail uses. The Project's Parcels A-E and Parcel F are located approximately 0.8 and 0.6 miles southeast of the District's Sequoia High School, respectively. The City proposes to evaluate six environmental topics in the EIR: (1) aesthetics, (2) air quality, (3) cultural resources, (4) greenhouse gas emissions, (5) noise, and (6) transportation.

The District is concerned that the Initial Study does not adequately evaluate impacts to the District's Sequoia High School. Specifically, the Initial Study does not adequately address how the Project will impact the District's abilities to house its students; how the Project's impacts on transportation, traffic, and circulation in the area will impact the safety and convenience of District students, parents, and staff; and generally how the Project will impact the District's ability to deliver its educational program at Sequoia High School. The District, therefore,

*Limited Liability Partnership*



contends that the limited scope of the City's proposed EIR is inappropriate, and submits these comments in order to preserve its concerns regarding the proposed scope and content of the proposed EIR.

Below are specific scoping requests for the EIR, which the City must address in the EIR to evaluate adequately the potential environmental impacts of the Project on the District.

**Transportation/Circulation/Traffic Analysis**

- 1. Describe the existing and the anticipated vehicular traffic and student pedestrian movement patterns to and from school sites, including consideration of bus routes.**
- 2. Assess the impact(s) of increased vehicular movement and volumes, including potential conflicts with school pedestrian movement, school transportation, and busing activities.**
- 3. Estimate travel demand and trip generation, trip distribution and trip assignment by including consideration of school sites and home-to-school travel.**
- 4. Assess cumulative impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending.**
- 5. Discuss the direct, indirect, and cumulative impacts on the circulation and traffic patterns in the community as a result of traffic generated by the transportation needs of students to and from the Project and schools throughout the District during the Project build-out.**
- 6. Assess the impacts on the routes and safety of students traveling to school by vehicle, bus, walking, and bicycles.**

The District has significant concerns about the traffic, transportation, and circulation impacts that the Project may have on the District, including the District's staff, parents, and students that attend Sequoia High School. The foregoing categories of information are critical for determining the extent of those impacts on the District.

Any environmental analysis related to the proposed Project must address potential effects related to traffic, noise, air quality, and any other issues affecting schools. (Pub. Resources Code, §§ 21000, *et seq.*; Cal. Code Regs., tit. 14, §§ 15000, *et seq.*; *Chawanakee Unified School District v. County of Madera, et al.*, (2011) 196 Cal.App.4th 1016.) Additionally, specifically related to traffic, there must also be an analysis of safety issues related to traffic impacts, such as reduced pedestrian safety, particularly as to students walking or bicycling to and from Sequoia High School; potentially reduced response times for emergency services and first responders traveling to Sequoia High School; and increased potential for accidents due to gridlock during school

drop-off and pick up hours. (See, Journal of Planning Education and Research, “Planning for Safe Schools: Impacts of School Siting and Surrounding Environments on Traffic Safety,” November 2015, Chia-Yuan Yu and Xuemei Zhu, pg. 8 [Study of traffic accidents near Austin, Texas schools found that “[a] higher percentage of commercial uses was associated with more motorist and pedestrian crashes” around schools].)

As discussed, the District’s Sequoia High School is located just northwest of the Project’s site. The Project site’s neighborhood, which is located on the periphery of the City’s downtown core, is one of the most heavily traversed areas in Redwood City. According to the City’s General Plan, El Camino Real (State Route 82), off of which both the Sequoia High School and the Project sites are located, is one of the few major boulevards in the City, and serves as a regional route connecting San Jose and San Francisco.<sup>1</sup> El Camino Real already suffers from substantial vehicular congestion, which produces noise, exhaust fumes, and pollution.<sup>2</sup> Further, a trend currently exists where commuters along El Camino Real seek less-congested travel paths in the residential neighborhoods to the north and south of the boulevard, resulting in speeding and dangerous traffic conditions in those neighborhoods, including those residential neighborhoods surrounding the Sequoia High School.<sup>3</sup> Acknowledging these issues, the City’s General Plan provides that El Camino Real “will be updated to facilitate walkable linkages between Sequoia High School, the transportation center at the Caltrain Station, and Downtown Redwood City.”<sup>4</sup>

The Project site is also located in an area that has experienced a drastic impact in traffic over the last ten to fifteen years as the City has continued to approve of newer commercial, office, and residential land uses. Adding to the District’s concerns regarding traffic surrounding the Project site and the Sequoia High School are the number of development projects that have recently been approved by the City and/or completed in the area, including the 1305 El Camino Real project (137 multi-family residential units); the 1548 Maple Street project (131 three-story townhome residential units); the Broadway Plaza project (mixed-use project consisting of approximately 520 residential units, 420,000 sf of office space; and 26,000 sf of retail space). There are several other projects that are being considered by the City, including the 150 Charter Street project (72 residential units), and the 1125 Arguello Street project (68 townhomes), all of which promise to drastically increase traffic in the neighborhood and District. **Given the magnitude of development being considered and approved in this area, the District maintains that the limited EIR being proposed by the City is inappropriate and in conflict with the letter and spirit of CEQA.**

The existing congestion of the Project site’s neighborhood, combined with all of the various projects located within the vicinity of the Sequoia High School, threaten to have significant impacts, both individually and cumulatively, on the students attending the High School, as well

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<sup>1</sup> Redwood City General Plan (October 11, 2010), p. BE-25

<sup>2</sup> *Id.* at Figure BE-14; pp. BE-106 and BE-131.

<sup>3</sup> *Id.* at p. BE-134.

<sup>4</sup> Redwood City General Plan (October 11, 2010), p. BE-25

as District staff. Per the Initial Study, the proposed Project would cause the traffic volumes at the Project's site to increase by 630 vehicles and 535 vehicles during the AM and PM peak hours, respectively. It is anticipated that the Project will draw hundreds of additional office workers and residents to the area. This substantial influx of new vehicles and residents will severely exacerbate the already stifling traffic in the neighborhood and the safety issues posed thereby, including by further diverting traffic away from El Camino Real and into the residential neighborhoods surrounding Sequoia High School. The increase in traffic and residents will also severely impact the safety and convenience of Sequoia High School students who walk or bike to school, thus undermining both the City's and the District's policies to facilitate and encourage alternative modes of student transportation.

We urge the City thoroughly to address and analyze each of the above listed items through its EIR, and implement extensive and thoughtful mitigation measures.

### **Noise**

**7. Identify any noise sources and volumes which may affect school facilities, classrooms and outdoor school areas.**

While it is not discussed in the Initial Study, it is expected that noise from construction and operation of the Project will cause impacts on the District's educational program at Sequoia High School. Request No. 7 is intended to clarify that the EIR's consideration of noise issues take into account all of the various ways in which noise may impact schools, including increases in noise levels in the immediate vicinity of Sequoia High School.

### **Population**

**8. Describe historical, current, and future population projections for the District.**

The District anticipates that this project will generate students and specifically requests that historical, current, and future population projections for the District be addressed in the EIR. Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact the District and its provision of educational services, largely because of resulting school overcrowding, while a district with declining enrollment may depend on new development to avoid school closure or program cuts. Overcrowding can constitute a significant impact within the meaning of the California Environmental Quality Act ("CEQA"). (See, Cal.Code Regs., tit.14, §§ 15064(e).) This is particularly true where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and a need for new school construction. The same can hold true for potential school closures or program cuts resulting from a declining population.

**Housing**

- 9. Describe the type and number of anticipated dwelling units indirectly resulting from the Project.**
- 10. Describe the average square footage for anticipated dwelling units, broken down by type of unit, indirectly resulting from the Project.**
- 11. Estimate the amount of development fees to be generated by development in accordance with implementation of the Project.**
- 12. Describe the phasing of residential and development over time from inception to build-out of the Project.**
- 13. Identify the anticipated number of units available for low-income housing.**

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District caused by increased population growth. California school districts are dependent on developer fees authorized by the provisions of Government Code Sections 65995, *et seq.*, and Education Code sections 17620, *et seq.*, for financing new school facilities and maintenance of existing facilities. The developer fees mandated by Section 65995 provide the District the bulk of its local share of financing for facilities needs related to development.

The adequacy of the statutory development fees to offset the impact of new development on local school districts can be determined only if the types of housing and average square footage can be taken into consideration. For instance, larger homes often generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek – and presumably to receive – such square footage information from local planning departments. (Gov. Code § 65995.5(c)(3).)

While the foregoing funding considerations are fiscal issues, they translate directly into physical, environmental impacts, in that inadequate funding for new school construction can result in overcrowding of existing facilities. Furthermore, fiscal and social considerations are relevant to an EIR, particularly when they either contribute to or result from physical impacts. (Pub. Resources Code § 21001(g); Cal.Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.)

Phasing of development is also a crucial consideration in determining the extent of impact on schools. The timing of the development will determine when new students are expected to be generated, and therefore is an important consideration particularly when considering the cumulative impact of a project in conjunction with other approved or pending development.

**Public Services - Schools**

- 14. Describe existing and future conditions within the District, on a school-by-school basis, including size, location and capacity of facilities.**
- 15. Describe the adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.**
- 16. Describe the District's past and present enrollment trends.**
- 17. Describe the District's current uses of its facilities.**
- 18. Describe projected teacher/staffing requirements based on anticipated population growth and existing State and District policies.**
- 19. Describe any impacts on curriculum as a result of anticipated population growth.**
- 20. Identify the cost of providing capital facilities to accommodate students on a per-student basis, by the District.**
- 21. Identify the expected shortfall or excess between the estimated development fees to be generated by the Project and the cost for provision of capital facilities.**
- 22. Assess the District's present and projected capital facility, operations, maintenance, and personnel costs.**
- 23. Assess financing and funding sources available to the District, including but not limited to those mitigation measures set forth in Section 65996 of the Government Code.**
- 24. Identify any expected fiscal impacts on the District, including an assessment of projected cost of land acquisition, school construction, and other facilities needs.**
- 25. Assess cumulative impacts on schools resulting from additional development already approved or pending.**

The District wishes to make certain that each of these issues is directly discussed in the EIR. Regarding Requests 14 - 17, each of these requests go to the issue of the current condition of the District. Infrastructure is included for consideration precisely because it is an often overlooked factor. While it may appear that a school site has sufficient space to accommodate additional students, an inadequate infrastructure – which might include cafeterias, restroom facilities, sewerage, electrical capacity, and the like – may preclude such growth. Placing too great a strain on the infrastructure is itself a physical impact to be addressed in an EIR.



Relative to Request 14, the Draft EIR should also address the location of current planned school sites in all affected school districts, both to determine the adequacy of the space existing or available for school facilities and also to address traffic, student safety and related impacts affected by a school's location.

The population elements addressed in Request 16 are essential because the ultimate impact of growth can best be determined by comparing existing student enrollment, expected future enrollment, and total school capacity.

Request 17 is a necessary consideration because certain school facilities may have been designated for particular community uses, or otherwise be unavailable for full classroom service, meaning that they cannot be considered in determining the District's total capacity. Also, some classrooms are dedicated as labs, meaning that they cannot hold the full complement of students that would occupy a traditional classroom, again affecting a school's total capacity.

Requests 18 and 19 are included because they are relevant to the social impacts which may stem from the Project. Again, such impacts are relevant to the extent they are caused by or result from physical impacts, which would include growth. (Pub. Res. Code § 21001(g); Cal.Code Regs., tit.14, §§ 15021(b), 15131(a)-(c), 15142 & 15382.) If classrooms become overcrowded, or certain programs cannot be offered because of overwhelming student demand, the community's educational services are harmed, a clear social impact. Further, overcrowded classrooms create additional safety concerns, both for students and teachers.

Requests 20 through 24 deal with fiscal impacts on the District. The most immediate means of determining whether school overcrowding will occur is to determine first whether the District has adequate available capacity, and second, if not, whether it has adequate sources of funding available to construct new facilities or expand existing ones. This requires consideration of how much it costs to house each student, and how much of that amount can be covered by existing funding sources. To the extent that the existing sources prove insufficient, the difference is an unmitigated impact on the District.

Finally, Request 25 again seeks to ensure that a cumulative impact analysis is conducted, as there has been significant development approved and projected within the District's borders.

### **Conclusion**

The District is not anti-development. However, the needs of the District must be appropriately considered in the environmental review process for all proposed new development that will impact the District, such as the Project. The District is hopeful that it will be able to collaborate with the Developer and the City in order to identify and propose solutions that alleviate the impacts caused by Developer's Project, and is prepared to provide any information necessary to assist the City in preparation of the EIR and in addressing each of the comment and scope/content issues set forth above.

Ms. Lindy Chan, Principal Planner  
City of Redwood City, Planning Services  
August 9, 2019  
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We request that all notices and copies of documentation with regard to this Project be mailed both to the District directly, and also to our legal counsel's attention as follows:


Mary E. Streshly, Superintendent  
Sequoia Union High School District  
480 James Avenue  
Redwood City, CA 94062

Kelly M. Rem  
Lozano Smith  
2000 N. Main St., Suite 500  
Walnut Creek, CA 94596

Please feel free to contact me directly if we can be of any assistance. Thank you.

Sincerely,

LOZANO SMITH

  
Kelly M. Rem

KMR/mag

cc: Mary E. Streshly, Superintendent (mstreshly@seq.org)



# SIERRA CLUB

## LOMA PRIETA

*Serving San Mateo, Santa Clara and San Benito Counties  
Protecting Our Planet Since 1933*

July 29, 2019

City of Redwood City, Planning Services  
Attn: Lindy Chan, Principle Planner  
1017 Middlefield Road  
Redwood City, CA. 94063

Via Email: [lchan@redwoodcity.org](mailto:lchan@redwoodcity.org)

**Subject: Public Comments re: 1601 & 1304 El Camino Real (Greystar Development)**

Dear Ms. Chan,

The Sustainable Land Use Committee of the Loma Prieta Chapter of the Sierra Club (SLU) advocates on land use issues in San Mateo and Santa Clara Counties. When reviewing a proposed development such as Greystar, SLU evaluates it using our [Guidelines for Residential, Commercial, and Mixed-Use Transit-Oriented Development](#) to decide whether it will qualify for a Sierra Club endorsement. We have done a preliminary evaluation of the Greystar Development and have the following comments:

**GENERAL COMMENTS:**

**A. We are pleased that the project:**

- 1) Is located near downtown and the Caltrain Station
- 2) Includes attractive exterior streetscapes, plazas, and open spaces the balance automobile and pedestrian uses
- 3) Includes 291 units of housing (97 affordable [76 at very-low and low income levels])
- 4) Includes a landscaped walkway next to Redwood Creek, and proposes financially subsidizing a Community Garden on city-owned property along the creek.
- 5) Includes green roof terraces on many of the buildings

- 6) Helps impliment the city's bicycle master plan
- 7) Includes car-share on-site
- 8) Retains an historic structure

**B. We are very concerned about the following issues:**

- 1) Number of jobs and number of housing units is seriously out of balance: The 550,000 SF of office development will result in adding between 1,833 and 3,667<sup>1</sup> jobs to Redwood City which at a 1.5 jobs per housing unit<sup>2</sup> would require between 1,222 and 2,445 new housing units to maintain a healthy jobs / housing balance. This leaves this development between 931 and 2,154 units short which will only exacerbate the current peninsula-wide jobs / housing imbalance. We recommend that the commercial to housing ratio be reconsidered by reducing office space and increasing housing units closer to the 1.5 / 1.0 ratio.
- 2) Too much parking: The number of parking stalls seems excessive for a transit-oriented development. The State bonus for housing allows a 0.5 parking spaces per unit which is half of what is proposed, and the office section seems over-parked for a TOD depending on the final number of jobs anticipated.
- 3) Shared and Unbundled Parking: Due to the early stage of this development, it is not clear if there will be any shared parking or unbundled parking which would reduce the number of spaces required. We recommend shared and unbundled parking be included to reducing total parking.
- 4) Bicycle ratios are low: SLU<sup>3</sup> recommends 1 bike parking space per housing unit. The development provides 1 space per 3 units. SLU recommends 25% bike-to-car parking ratio for commercial and guest parking. The development provides only 5%. SLU recommends incentives for bicycle use such as showers, lockers, bike-repair areas, bike rental stands, etc. We could not find this addressed in the project description.

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<sup>1</sup> **Jobs / Square Foot** – Rule of thumb for jobs per square foot is between 150 SF per job to 300 SF per job depending on the office use. High tech companies today tend closer to 150 SF per job or lower while R&D tends more toward 300 SF per job. <https://mehiganco.com/?p=684>

<sup>2</sup> **Healthy Jobs / Housing Balance** - According to the Building Industry Association and the California Department of Finance, a healthy jobs / housing balance is 1.5. (One full-time job and one part-time job per housing unit). Any ratio above 1.5 jobs per unit signifies there is an insufficient number of units to meet the needs of the local workforce. The EIR for the development should specify the anticipated number of jobs expected in the development and quantify the number of housing units expected to be needed to house those employees. Even if there is a numerical Jobs / Housing balance, there is often an imbalance in **Jobs / Housing Fit** (where employees have high enough income to afford the housing in their community). Jobs / Housing Fit should also be taken into consideration when reviewing new commercial developments.

<sup>3</sup> **SLU** – Sustainable Land Use Committee, Sierra Club Loma Prieta

- 5) Incentives for transit use: Will the developer provide incentives for transit use such as discounted or free transit passes? Such incentives would reduce the number of parking spaces needed.
- 6) Resource Efficiency: A project of this size should strive to include a) Net Zero Carbon Energy; b) Net Zero Water Use; c) Net Zero Waste; and d) meet LEED Gold or Platinum construction. At this early stage, it's not clear if any of these areas are being considered.
- 7) Healthy Ecology: a) All building glazing should be bird-friendly to prevent birds from crashing into buildings; b) the project should discourage harmful pesticide use for landscaping and pest control; c) the project should carefully select trees and planting<sup>4</sup> to create a healthy, preferably native, ecology throughout the project and give Redwood Creek edges special treatment. The entire site should use low impact development strategies<sup>5</sup> for green infrastructure for storm water.
- 8) Redwood Creek: The creek is an unsightly and not ecological concrete trench that needs to be improved. This should be included as part of the scope of work for this project.

#### **SCOPING FOR EIR:**

EIR should address;

- 1) The traffic and environmental implications of the major jobs / housing imbalance within the project. The EIR for the development should specify the anticipated number of jobs expected in the development and quantify the number of housing units needed to house those employees, and where those housing units will be located.
- 2) The environmental implications of too much parking within the project and how that might increase traffic by inducing demand. The EIR should include specific mitigations to reduce parking on-site.
- 3) The environmental implications of not including a) Net Zero Carbon Energy; b) Net Zero Water Use; c) Net Zero Waste; and d) by not meeting LEED Gold or Platinum construction.
- 4) The environmental implications of not restoring the portion of Redwood Creek that runs through the site to improve flood control, and improve the aesthetics of the current unattractive concrete trench by adding native planting along the creek.
- 5) The environmental impact of bird strikes on glass facades and use of pesticides and rodenticides. The EIR should include specific mitigations for these issues.

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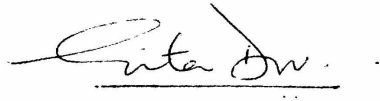
<sup>4</sup> [Urban Habitat Design Guidelines](#) should be used to create a healthy plant palette

<sup>5</sup> Low Impact Development – [San Mateo County Green Streets and Parking lots](#) Design Handbook



We look forward to participating in this important process for the City of Redwood City as it moves forward.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Gita Dev", is written over a horizontal line. The signature is fluid and cursive.

Gita Dev, Co-Chair

Sustainable Land Use Committee, Sierra Club Loma Prieta (SCLP)