

# 1304 El Camino Real CEQA Analysis

Prepared for:

**City of Redwood City**

Prepared by:

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## Table of Contents

1.	Introduction .....	1-1
1.1	CEQA Streamlining–Overview.....	1-1
1.2	CEQA Streamlining–Project Analysis .....	1-2
1.3	CEQA Analyses Document Organization .....	1-3
2.	Project Description.....	2-1
2.1	Project Site and Vicinity.....	2-1
2.2	Project Characteristics.....	2-1
2.3	DTPP Consistency.....	2-6
2.4	Construction Activities and Schedule .....	2-6
2.5	Utilities and Service Connections .....	2-10
2.6	Standard Development Requirements .....	2-10
3.	Environmental Checklist .....	3-1
3.1	Aesthetics .....	3-1
3.2	Agricultural and Forestry Resources .....	3-6
3.3	Air Quality .....	3-8
3.4	Biological Resources .....	3-16
3.5	Cultural Resources .....	3-22
3.6	Energy .....	3-25
3.7	Geology and Soils .....	3-29
3.8	Greenhouse Gas Emissions.....	3-35
3.9	Hazards and Hazardous Materials .....	3-38
3.10	Hydrology and Water Quality.....	3-42
3.11	Land Use and Planning .....	3-48
3.12	Mineral Resources.....	3-50
3.13	Noise.....	3-52
3.14	Population and Housing .....	3-60
3.15	Public Services .....	3-62
3.16	Recreation .....	3-66
3.17	Transportation and Traffic.....	3-68
3.18	Tribal Cultural Resources .....	3-71
3.19	Utilities and Services .....	3-73
3.20	Wildfire.....	3-77

## List of Figures

Figure 2.1	Project Location .....	2-2
Figure 2.2	Project Site .....	2-3
Figure 2.3-A	Conceptual Renderings Parcel F .....	2-4
Figure 2.3-B	Conceptual Renderings Parcel F .....	2-5
Figure 3.1	Shadow Diagram .....	3-5

## List of Tables

Table 2.1	Proposed Residential Units on Parcel F .....	2-1
Table 2.2	DTPP Consistency Table .....	2-7
Table 3.3-1	Construction-Related and Operational Screening Level Sizes .....	3-10
Table 3.3-2	Summary of Construction-Related Emissions .....	3-11
Table 3.6-1	Energy Efficiency Policies .....	3-27
Table 3.8-1	Operational Screening Level Sizes .....	3-36
Table 3.13-1	Construction Equipment Noise Levels (dB, $L_{eq}$ ) at the Nearest Noise-Sensitive Uses in the Project Area .....	3-54
Table 3.13-2	Construction Equipment Vibration Levels (VdB, PPV) at the Nearest Noise- Sensitive Uses in the Project Area .....	3-56

## Acronyms and Abbreviations

AB	Assembly Bill
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
CA OES	California Office of Emergency Services
CAP	Climate Action Plan
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Level Equivalent
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2e</sub>	Carbon dioxide-equivalents
dB	decibels
dBA	A-weighted sound levels
DTPP	Downtown Precise Plan
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
GHG	greenhouse gas
IPaC	Information for Planning and Consultation
I-680	Interstate 680
I-880	Interstate 880
L <sub>eq</sub>	Equivalent Sound Level
LID	Low Impact Development
LOS	Level of Service
MT	Million tons
NO <sub>x</sub>	Oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
OSHA	federal Occupational Health and Safety Administration
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM <sub>10</sub>	particulate matter equal to or less than 10 micrometers in diameter
PM <sub>2.5</sub>	particulate matter equal to or less than 2.5 micrometers in diameter



PPV	peak particle velocity
RCFD	Redwood City Fire Department
RCPD	Redwood City Police Department
RCSD	Redwood City School District
ROG	Reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBSA	South Bayside System Authority
SCA	Standard Conditions of Approval
SDBL	State Density Bonus Law
SGMP	sustainable groundwater management plan
SR	State Route
SUHSD	Sequoia Union High School District
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VdB	vibration decibels
VMT	Vehicle miles traveled

# 1. Introduction

Greystar Development (Applicant) is proposing to construct one multi-family building containing 39 affordable housing units at 1304 El Camino Real (project) in the City of Redwood City. The City of Redwood City (City) serves as the California Environmental Quality Act (CEQA) lead agency for the project. This Consistency Analysis provides the appropriate CEQA analysis and findings to support the City's action on the project. The City previously prepared and certified a Program Environmental Impact Report (EIR) for the Redwood City Downtown Precise Plan, which was completed in 2010 and certified in 2011 and analyzed the impacts of development anticipated under the Downtown Precise Plan (DTPP). The impacts associated with the types of development proposed in the DTPP Implementation Area, proposed zoning and land use designations, development density, and the locations where DTPP development would occur were analyzed in the 2010 DTPP Program EIR. Therefore, pursuant to CEQA and the CEQA Guidelines (see Section 1.1, below), the City, as the lead agency, intends to use the 2010 DTPP Program EIR as the CEQA document for the environmental impacts associated with the proposed project.<sup>1</sup>

The purpose of this CEQA document is to evaluate the potential environmental effects of the proposed project, and to determine whether such impacts were adequately covered under the DTPP Program EIR, so that CEQA streamlining and/or tiering provisions and exemptions could be applied to the proposed project. The analysis herein incorporates information from the DTPP Program EIR, and includes a CEQA Checklist (see Chapter 3) and supporting documentation to provide comprehensive review and public information for the basis of determining whether the Program EIR adequately addresses the potential effects of the proposed project.

Based on the environmental evaluation, and as the checklist demonstrates, the proposed development at 1304 El Camino Real qualifies for several CEQA streamlining and/or tiering provisions and CEQA exemptions, each of which separately and independently provide a basis for CEQA compliance. These provisions and exemptions are discussed below, and provide a basis for CEQA compliance.

## 1.1 CEQA Streamlining—Overview

Applicable CEQA streamlining and/or tiering code sections are described next, each of which, separately and independently, provides a basis for CEQA compliance for the proposed project.

1. **Community Plan Exemption.** Section 21083.3 of the Public Resources Code and Section 15183 of the CEQA Guidelines allow streamlined environmental review for projects that are “consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified... except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.” Section 15183(c) specifies that “if an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the

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<sup>1</sup> The South Main Mixed-Use project site is composed of five contiguous blocks totaling 8.30 acres (Parcels A through E), and a 0.15-acre portion of a separate block (Parcel F). Although project Parcels A through E are just outside the downtown core, the non-contiguous Parcel F is in the Downtown Precise Plan (DTPP) area. Section 21083.3 of the Public Resources Code and Section 15183 of the CEQA Guidelines allow streamlined environmental review for projects that are “consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as might be necessary to examine whether there are project specific significant effects which are peculiar to the project or its site.” Section 15183(c) specifies that “if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards..., then an EIR need not be prepared for the project solely on the basis of that impact.” Therefore, pursuant to the CEQA Guidelines, the City as the lead agency intends to use the 2010 DTPP Program EIR as the CEQA document for disclosure of the environmental impacts associated with development of Parcel F. However, to the extent warranted, the project-specific EIR prepared for the South Main Mixed Use Project addresses potentially significant impacts resulting from development of Parcel F together with the proposed development on Parcels A through E located approximately 1,000 feet south of Parcel F at 1601 El Camino Real.

imposition of uniformly applied development policies or standards,... then an additional EIR need not be prepared for the project solely on the basis of that impact.”

2. **Qualified Infill Exemption.** Section 21094.5 of the Public Resources Code and Section 15183.3 of the CEQA Guidelines allow streamlining for certain qualified infill projects by limiting the topics subject to review at the project level, if the effects of infill development have been addressed in a planning-level decision or by uniformly applicable development policies. Infill projects are eligible if they are in an urban area on a site that either has been previously developed, or that adjoins existing qualified urban uses on at least 75 percent of the site’s perimeter; satisfy the performance standards provided in Appendix M of the CEQA Guidelines; and are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy. No additional environmental review is required if the infill project would not cause any new specific effects or more significant effects; or if uniformly applicable development policies or standards would substantially mitigate such effects.
3. **Later Activities Contemplated by a Program EIR.** Section 15168(c) of the CEQA Guidelines states that if, pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document is required. An agency is to incorporate feasible mitigation measures and alternatives developed in the Program EIR, and when the later activities involve site-specific operations, the agency is to use a written checklist or similar device to document the evaluation of the site and activity, to determine whether the environmental effects of the operation were covered in the Program EIR.

The CEQA Checklist set forth in Chapter 3 evaluates the potential environmental effects of the proposed project, and evaluates whether these impacts were covered adequately by the DTPP Program EIR, to allow the above-listed streamlining and/or tiering provisions of CEQA to apply. The analyses that were conducted incorporate by reference the information in the DTPP Program EIR. Mitigation measures that were identified in the DTPP Program EIR would apply to the proposed project, as would the City’s Conditions of Approval (COAs), the intent of which is summarized in Section 2.6, “Standard Development Requirements.” The proposed project would be required to incorporate and/or comply with the applicable requirements of the mitigation measures identified in the DTPP Program EIR and with applicable City COAs; therefore, the measures and COAs are assumed herein to be included as part of the proposed project. To the extent that any applicable COA was inadvertently omitted from this CEQA document, it is automatically incorporated herein by this reference.

## 1.2 CEQA Streamlining–Project Analysis

The proposed project satisfies each of the foregoing CEQA provisions, as summarized below.

- **Community Plan Exemption.** Development within the Downtown Precise Plan area is subject to the Plan’s ten development regulation sections, including Historic Resources, Uses, New Streets, Public Frontages, Building Placement and Landscaping, Parking, Height, Façade Composition, Architectural Character, and Signs. Projects are evaluated for consistency with the DTPP, and for conformance with development standards. The environmental review of the DTPP is intended to streamline the processing of proposed projects that are consistent with the DTPP. This CEQA consistency analysis satisfies the requirements of a community plan exemption (Section 15183 of the CEQA Guidelines), based on the analyses presented in this document. The proposed project would be permitted in the zoning district where the project site is located, and is consistent with the DTPP. The CEQA Checklist included as Section 3 below concludes that the proposed project would not result in significant impacts that: (1) are peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the previous DTPP

Program EIR; or (3) were previously identified as significant effects but are determined to have substantially more severe adverse impacts than discussed in the previous Program EIR.

- **Qualified Infill Exemption.** The analyses conducted herein also indicate that the proposed project would be eligible for a qualified infill exemption, pursuant to Section 15183.3 of the CEQA Guidelines. The infill eligibility criteria are presented in Section 3 and are supported by the CEQA Checklist.
- **DTPP Program EIR Streamlining:** The DTPP Program EIR was certified by the City Council of Redwood City on January 24, 2011 (State Clearinghouse #2006052027). The DTPP Program EIR assessed the potential environmental impacts resulting from implementation of the DTPP. The DTPP established new land use, development, and urban design regulations for the 183-acre DTPP area for a 20-year planning period. The DTPP Program EIR was designed to support future environmental analysis for projects consistent with the DTPP. In addition to assessing the applicability of Community Plan and Qualified Infill Exemptions, the checklist in Section 3 was prepared to consider whether any new environmental effects not identified in the DTPP Program EIR might be created by construction and operation of the 1304 El Camino Real project.

Based on an examination of the analyses, findings, and conclusions of the DTPP Program EIR as summarized in the CEQA Analyses in Chapter 3, "Environmental checklist," the DTPP Program EIR adequately analyzed the potential environmental impacts associated with the proposed project as modified and updated by this CEQA Analyses document, and the streamlining and/or tiering provisions of CEQA would apply to the proposed project.

### 1.3 CEQA Analyses Document Organization

This document is organized as follows:

- **Chapter 1, Introduction.** This chapter summarizes the environmental review process for the proposed project, and documents the City's determination to proceed with CEQA streamlining pursuant to Section 15183, Section 15183.3, and Section 15168(c) of the CEQA Guidelines.
- **Chapter 2, Project Description.** This chapter describes the proposed project.
- **Chapter 3, Environmental Checklist.** This chapter describes the proposed project's environmental impacts and compares them with the DTPP Program EIR.
- **Attachments.** The attachments to this document include the supplemental material that is referenced in this CEQA Analyses document: Attachment NOI – Noise Assessment, Attachment CUL – Historical Resource Analysis, Attachment ABR – Arborist Report, and Attachment M – CEQA Performance Standards for Infill Projects.

## 2. Project Description

### 2.1 Project Site and Vicinity

The project site is located at 1304 El Camino Real in the City of Redwood City's Downtown core (Figure 2.1 – Project Location) and fall within the planning area of the DTPP and DTPP Program EIR. The project site encompasses approximately 0.15 acre and is referred to as Parcel F (Figure 2.2 – Project Site). Parcel F is regionally accessible via State Route (SR) 84 and the SR 84/US 101 interchange, about 1 mile to the northeast. Local access to the project site is via El Camino Real, which fronts the project site. Parcel F is approximately 0.3 mile southeast of the Redwood City Transit Center. At the Redwood City Transit Center, riders can transfer to a number of San Mateo County Transit District (SamTrans) routes, as well as Caltrain, SamTrans Flex, and Express routes, and SamTrans/BART connectors.

Parcel F is designated as DTPP/Mixed-Use Downtown in the General Plan and zoning designation. The DTPP designation is intended to stimulate development in the City's Downtown core, and emphasize pedestrian orientation in site and building design, promoting a walkable environment with active street frontages, well-scaled and designed buildings, and engaging outdoor spaces. Parcel F is made up of one existing parcel in the northeastern corner of the block at 1304 El Camino Real. The site is bounded by El Camino Real to the east, Jackson Avenue to the north, and existing development to the west and south. The site is currently developed with a one-story building formerly occupied by Precision Tune Auto Care. The existing structure occupies approximately 60 percent of the northern portion of the parcel, with the balance used for parking. The development to the south is a historic resource with associated surface parking (labeled as "R" in the DTPP). Surrounding uses in the vicinity of the site include auto repair shops, small commercial buildings, large multi-tenant residential developments, and retail businesses.

### 2.2 Project Characteristics

The proposed project would include one multi-family building on Parcel F for 39 affordable housing units. The project would replace the existing 22 very-low-income units on the City-owned portion of Parcel C, and provide an additional 16 very-low-income units and a manager's unit.

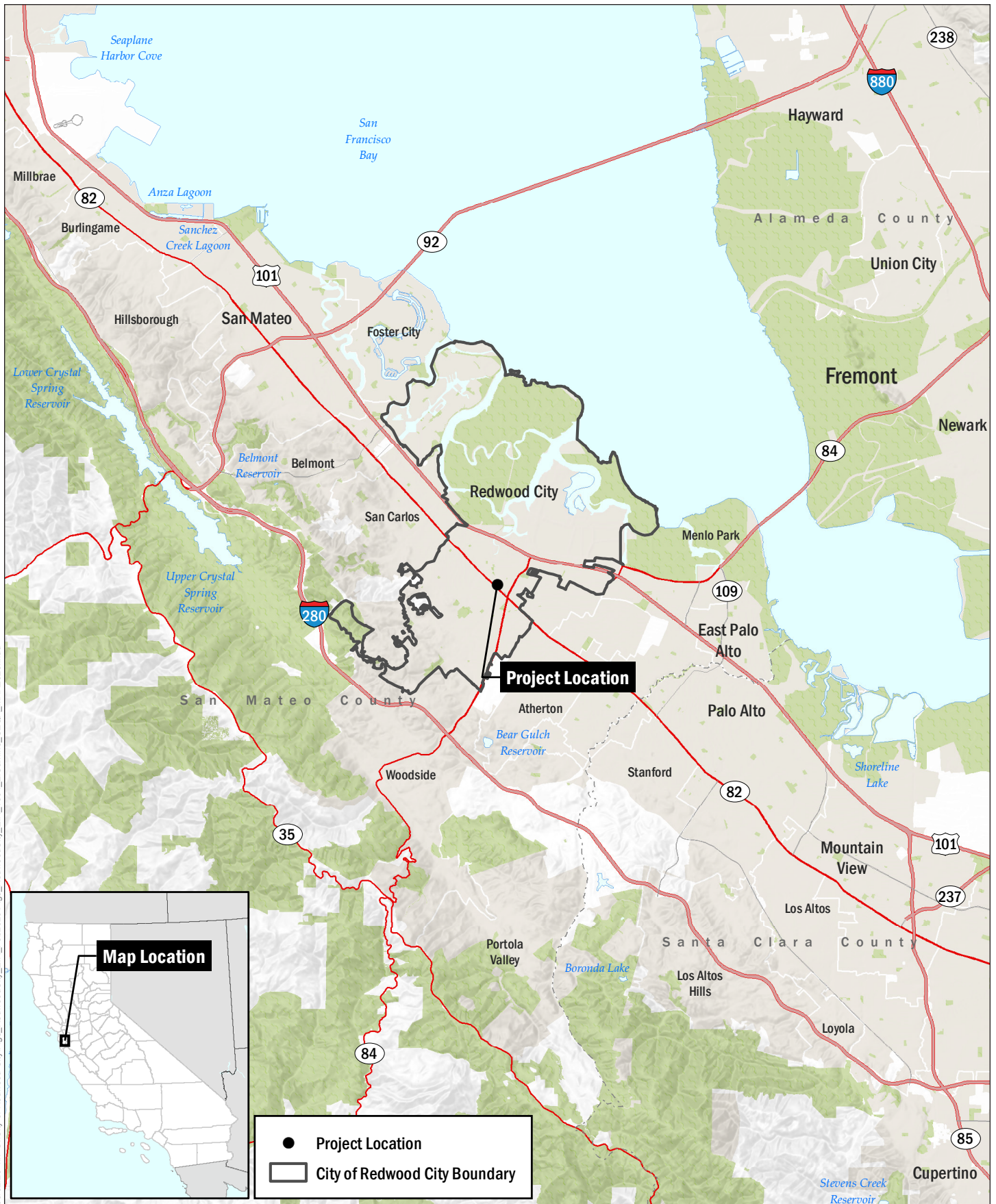
**Table 2.1 Proposed Residential Units on Parcel F**

Unit Type	Quantity
Studio	30
1 bedroom	8
2 bedrooms	1
Total Residential Units	39

The project would demolish the existing building on Parcel F and construct a six-story, 66-foot-high building fronting El Camino Real, as shown in Figures 2.3-A and 2.3-B. The proposed building would occupy the entirety of the project lot, with the residential units above parking, the main lobby, and a community room on the first floor. The 12-space parking lot and the bike storage area would be accessible via Jackson Avenue.



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Data Source: ESRI, 2019.

## PROJECT LOCATION

1304 El Camino Real CEQA Analysis  
City of Redwood City, California

**FIGURE 2.1**





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Data Source: ESRI, 2019.



**PARCEL F PROJECT SITE**

1304 El Camino Real CEQA Analysis  
City of Redwood City, California

**FIGURE 2.2**





INTERSECTION OF EL CAMINO REAL & JACKSON AVE.

Source: Lowney Architecture, 2019.

## CONCEPTUAL RENDERINGS PARCEL F

1304 El Camino Real CEQA Analysis  
City of Redwood City, California

**FIGURE 2.3-A**





VIEW FROM EL CAMINO REAL



STOREFRONT VIEW ALONG EL CAMINO REAL



AERIAL VIEW FROM SOUTH

Source: Lowney Architecture, 2019.

## CONCEPTUAL RENDERINGS PARCEL F

1304 El Camino Real CEQA Analysis  
City of Redwood City, California

FIGURE 2.3-B

## 2.3 DTPP Consistency

The DTPP evaluated up to 2,500 net new dwelling units in the Downtown Precise Plan Area. The DTPP sets aside 15 percent (375 units) of the 2,500 units for deed-restricted units and affordable to households earning a gross income of 80 percent or less of the area median income for the San Francisco Metropolitan Statistical Area, as determined annually by the U.S. Department of Housing and Urban Development, as adjusted for household size. The proposed project would construct 39 affordable housing units, which is 1.56 percent of the total planned housing in the DTPP, and approximately 10 percent of the affordable housing unit requirements. As of March 2020, there are 199 affordable housing units available for development in the Downtown Precise Plan Area. Based on existing and planned development, it is anticipated the amount of proposed affordable housing units would not exceed the amount of total planned housing in the DTPP. Table 2.2 details the proposed projects consistency with the DTPP.

## 2.4 Construction Activities and Schedule

### 2.4.1 General Construction Activities

Typical construction equipment such as graders, backhoes, excavators, and dozers would be used for site preparation and construction. No pile-driving or blasting is anticipated. Equipment and materials would be staged for construction within established work areas on the project site. Approximately 1,200 cubic yards of material are anticipated to be exported from the site during site preparation and project construction.

Heavy vehicles (i.e., haul [tractor-trailer] trucks, machinery) primarily would access the project site via El Camino Real, unless construction activities preclude such use. In addition to off-haul trips, vehicular trips would be generated by an estimated maximum of 10 workers per day. As part of project approvals, a construction parking plan would be required consistent with the City's standard Conditions of Approval. The parking plan would detail parking locations for both construction workers and equipment. The purpose of the parking plan is to reduce parking impacts to adjacent uses.

Construction on this parcel may require temporary lane closures on Jackson Street and/or El Camino Real. Lane closure procedures would be outlined in the project's construction traffic management plan developed in accordance with the City's Conditions of Approval. In addition, because El Camino Real is a State facility (State Route 82), any lane closures would require Caltrans approval and would be conducted in accordance with Caltrans regulations.

### 2.4.2 Construction Schedule and Phasing

Construction activities would typically occur during the work week, Monday through Friday, between 7:00 a.m. and 8:00 p.m. Any work outside of the City of Redwood City construction hours would require special noise permits. The proposed project construction would commence with site work, including tree removal, demolition, excavation, grading, and installation of utility infrastructure. Project construction for Parcel F would take place over 14 months. Construction on Parcel F would commence in fall 2020, and would conclude in winter 2021. This project schedule is dependent on market conditions, regulatory approvals, and other factors, and therefore is subject to change.

There would likely be multiple destinations for off-haul materials. Construction workers would also be arriving from different directions. Travel routes for workers, soils export, and material import would be determined in consultation with the City; however, the primary routes would be El Camino Real, SR 84, U.S. 101, and I-280.

**Table 2.2 DTPP Consistency Table**

	<b>DTPP Standard</b>	<b>1304 El Camino Project</b>
Use Regulations-Downtown General	<b>Permitted:</b> <ul style="list-style-type: none"> <li>• Neighborhood retail</li> <li>• Personal and Business Uses</li> <li>• Office</li> <li>• Workshop</li> <li>• General Residential</li> <li>• Specialized Residential</li> <li>• Lodging</li> <li>• Live-Work</li> <li>• Civic</li> </ul>	General Residential  <b>Consistent</b>
Setbacks (min./max.)	<b>Boulevard (El Camino Real):</b> Front: 0 ft/10 ft Fenced Edge: Permitted Side: 0 ft/10 ft Terraced Edge: Permitted Rear: 0 ft min. Frontage Coverage: 75% min. Built-to-Corner: Required  <b>Neighborhood Street (Jackson Avenue):</b> Front: 10 ft/25 ft Fenced Edge: Permitted Side: 5 ft/20 ft Terraced Edge: Permitted Rear Setback: Adjacent to single family home: 20 ft Frontage Cover: 75% min. Build -to-Corner: Not Required Flush Edge: Permitted	Front setback: 0 ft Side setback: 0 ft Rear setback: 5 ft Frontage Cover: >75% Built-to-Corner: Yes  Meeting a 10-foot minimum front setback on El Camino Real would preclude the ability to provide the 38 affordable housing units (plus manager's unit) at the density and with concessions permitted by the State Density Bonus Law (SDBL).  Meeting a 5-foot minimum side setback on Jackson Avenue would preclude the ability to provide the proposed 38 affordable housing units (plus manager's unit) at the density and with concessions permitted by the SDBL.  <b>Project will obtain waiver or concession under Government Code section 65915(d)</b>
Front Setback	<ul style="list-style-type: none"> <li>• Building elements are allowed to encroach into the required front setback as follows:</li> <li>• Balconies and bay windows may encroach no more than three feet into the required front setback</li> <li>• Trellises, awnings, canopies, stairs, cornices, and eaves may encroach no more than six feet into the required front setback</li> <li>• Entrance, porticos, porches, stoops, and covered entrance overhangs may encroach no more than twelve feet into the required front setback</li> </ul>	Balconies do not encroach onto required front setback.  Covered entrance overhang does not encroach more than 12 ft  <b>Consistent</b>

	DTPP Standard	1304 El Camino Project
Front Setback Landscaping	Front Setback areas shall be treated in accordance with the following standards in coordination with the applicable regulations for Private Frontage Types as specified in Section 2.8.4.	<p>No landscaping is anticipated in the Front Setback</p> <p><b>Consistent</b></p>
Parking- Zone 2	<ul style="list-style-type: none"> <li>Residential Studio Apartments – 0.75/1.5 (minimum/maximum) per Dwelling Unit (DU)</li> <li>Residential – 1 bedroom- 1 / 2 per DU</li> <li>Residential – 2 or more bedrooms- 1.5/3 per DU</li> <li>Permitted Parking Type: Wrapped Surface, Wrapped Base Parking Structure, Wrapped Parking Structure, Partially Submerged Parking Podium, Underground Parking Structure</li> </ul>	<p>Pursuant to Zoning Code Section 32.19(I)(5), which implements SDBL, an affordable housing development provided in connection with a non-residential development project “shall remain eligible for any State Density Bonus, incentives, concessions, waivers, or parking modifications for which the housing development project would otherwise be eligible.</p> <p>Per Government Code section (p)(3)(A): If development is located within one-half mile of a major transit stop, parking ratio shall not exceed 0.5 parking spaces per unit. 12 parking spaces are provided.</p> <p>The project features a ground level parking structure.</p> <p><b>Project will obtain waiver or concession under Government Code section 65915(d)</b></p>
Bicycle Parking	3 spaces required	<p>8 spaces provided</p> <p><b>Consistent</b></p>
Parking Access	Access to parking facilities is prohibited along Broadway between El Camino Real and Main Street. The maximum width of driveways/curb cuts is 12 feet for a one-lane and 24 feet for a two-lane driveway. The total width of parking access openings on the ground level of structured parking may not exceed 30 feet.	<p>No parking access along Broadway Driveway. The project features a 24-foot width ground level driveway entrance.</p> <p><b>Consistent</b></p>



DTPP Standard		1304 El Camino Project
Building Height and Disposition Regulations- 4 Story Zone	Maximum Height: 4 floors/48 feet	<p>Pursuant to Zoning Code Section 32.19(I)(5), which implements SDBL, an affordable housing development provided in connection with a non-residential development project "shall remain eligible for any State Density bonus, incentives, concessions, waivers, or parking modifications for which the housing development project would otherwise be eligible." (See also Govt. Code § 65915.7(i)).</p> <p>Meeting the four-story/48-foot maximum height limit would preclude the ability to provide the proposed 38 affordable housing units (plus manager's unit) at the density and with concessions permitted by the SDBL. The Parcel F affordable housing building is proposed to be 6 stories/ 66 feet, 3 inches.</p> <p><b>Project will obtain waiver or concession under Government Code section 65915(d)</b></p>
Architectural Character (El Camino Corridor)	Neoclassical, Craftsman, and Mediterranean are permitted. See page 119 of Downtown Specific Plan for photos of examples.	Neoclassical <b>Consistent</b>
Street Light Provisions	Twin Head Acorn (Acorn on Jackson Road)	No street lights proposed. <b>Consistent</b>
Street Tree Provisions	Chinese Elm (El Camino Real)	Chinese Elm along El Camino Real <b>Consistent</b>
Sidewalk Provisions- Boulevard	Sidewalks shall be a minimum of 6 feet wide. A 2-foot-wide paved apron shall be provided along the curb.	12-foot sidewalk along El Camino Real. <b>Consistent</b>
Sidewalk Provisions- Neighborhood Street	Sidewalks shall be a minimum of 7 feet wide. Planting strips shall be a minimum of 5 feet wide.	10-foot sidewalk along Jackson Avenue. <b>Consistent</b>

## 2.5 Utilities and Service Connections

Civil infrastructure for the project would be served by the City, including storm, sanitary sewer, and water services. Dry utilities are provided by Pacific Gas and Electric Company (PG&E [gas and electric]), and AT&T, Comcast, and Wave G (telecommunications). All services are available at the project site, and would be upsized during construction as necessary to provide system capacity in accordance with applicable standards.

## 2.6 Standard Development Requirements

The City has established conditions of approval and standard development requirements to address resource protection. The conditions of approval are specific conditions applicable to the proposed project. The standard development requirements are items which are codified or adopted by resolution. The proposed project would comply with these standard development requirements, which are described in in the relevant topical areas of Section 3 (refer to EIR Appendix COA for a complete list of requirements).

### 3. Environmental Checklist

This section evaluates the environmental effects of the project based on the thresholds of significance provided in Appendix G of the CEQA Guidelines. Because development on the project site has been previously evaluated in the DTPP Program EIR, and due to the infill nature of the project site, the checklist below applies the format of Appendix N of the CEQA Guidelines. In accordance with Section 15183.3 of the CEQA Guidelines, Appendix N applies to infill projects that were previously analyzed in a certified EIR, and serves to document the proposed project's consistency with the prior CEQA analysis and infill performance criteria specified in Appendix M of the CEQA Guidelines (see Attachment M). Where applicable, mitigation measures have been incorporated into the proposed project as set forth in the DTPP Program EIR.

The DTPP Program EIR was certified in 2011, prior to the latest CEQA Guidelines updates, which were published January 1, 2019. The significance criteria language in the CEQA Guidelines was updated, and three environmental issue areas were added: Energy, Tribal Cultural Resources, and Wildfire. The project-specific analyses below apply the updated 2019 significance thresholds, with any substantial changes from the 2010 checklist noted, where applicable. The three additional resource areas noted above are also included in this section. The project area is encompassed within and remains unchanged from the environmental and regulatory setting for the DTPP Program EIR (City of Redwood City, 2010).

#### 3.1 Aesthetics

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>I. Aesthetics. Except as provided in Public Resources Code Section 21099, would the project:</b>					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Public Resources Code Section 21099(d), effective January 1, 2014, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics impacts are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

1. The project is in a transit priority area<sup>2</sup>
2. The project is on an infill site<sup>3</sup>
3. The project is residential, mixed-use residential, or an employment center.

The project meets each of the above three criteria because each (1) is located within one-half mile of a rail transit station; (2) is located on an infill site that has been previously developed with commercial uses and is surrounded by areas of either recently completed or planned urban development; and (3) would be a residential project. Therefore, this project-specific analysis is not required to consider aesthetics in determining the significance of project impacts under CEQA. However, the City recognizes that the public and decision makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. An analysis of visual impacts is provided for informational purposes; and as discussed below, to confirm the project is consistent with the applicable City development standards pertaining to scenic quality. In addition, Public Resources Code Section 21099(d)(2) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers, and that aesthetics impacts do not include impacts on historical or cultural resources (e.g., historic architectural resources). Therefore, the City considers aesthetics for design review and to evaluate effects on historic and cultural resources.

### 3.1.1 Program EIR Findings

The DTPP Program EIR found that that no scenic vistas or view corridors would be substantially obstructed or degraded by future development that occurs in accordance with the DTPP, resulting in a less-than-significant impact.

The DTPP Program EIR also found that development occurring in conformance with the DTPP would result in a more discernible and distinctive Downtown form; improved height and scale relationships at sensitive transitions to adjacent low-rise neighborhoods; and would enhance the overall historic character of the area.

The DTPP Program EIR found that the potential development of a new, taller building would result in an increase in shadows cast by development. The DTPP identifies shade and shadow sensitive land uses as those uses where “sunlight is important to function, physical comfort, or the conduct of commerce.” Examples include public parks, plazas, or routinely usable outdoor areas of residential properties. The City determined that any new structure within the DTPP area that would cause identified shadow-sensitive uses and spaces to be more than 50 percent in shadow at 12:00 p.m. (noon) on the Spring Equinox (March 20) would impair the livability and beneficial uses of those shadow-sensitive uses and spaces, in which case a significant environmental impact would result. Therefore, DTPP development regulations were created with the specific intent to avoid significant shadow impacts. Full buildout of the DTPP to the maximum building envelopes allowed by the Plan’s regulations would not cause any shadow-sensitive uses and spaces to be more than 50 percent in shadow at noon on the Spring Equinox. The impact of DTPP implementation was considered to be less than significant, and no mitigations were required. The DTPP Program EIR also found that because new development within the DTPP area would be required to meet the lighting power allowances for Lighting Zone 3 for new installed outdoor lighting equipment contained in Title 24, Parts 1 and 6, Building Energy Efficiency Standards; unnecessary

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<sup>2</sup> Public Resources Code Section 21099(a)(7) defines a “transit priority area” as an area within one-half mile of an existing or planned major transit stop. A “major transit stop” is defined in Public Resources Code Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

<sup>3</sup> Public Resources Code Section 21099(a)(4) defines an “infill site” as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75% of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. “Qualified urban uses” are defined in Public Resources Code Section 21072 as any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.



brightness of lighting, debilitating glare, and sky glow would be adequately controlled. The impact of development occurring under the DTPP was considered to be less than significant.

The DTPP EIR concluded that impacts to aesthetic resources would be less than significant related to DTPP implementation, and no mitigation measures were required or identified.

### 3.1.2 Project Analysis

**a) Have a substantial adverse effect on a scenic vista?**

There are no scenic vistas in the project vicinity. Therefore, the project would not disrupt views of scenic resources in the City, and the project would have no impact to scenic vistas and would not have any new impacts substantially more severe than those analyzed in the DTPP Program EIR.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

The project site is not located near any state-designated scenic highways and would not be visible from any state-designated scenic highways. Interstate 280, the nearest state-designated scenic highway, is approximately 3.5 miles southwest of the project site (California Department of Transportation, 2016). Therefore, the project would have no impact within a state scenic highway, and would not have any impacts above those analyzed in the DTPP Program EIR.

**c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

The project would demolish the existing building on site and construct a six-story, 66-foot-high building fronting El Camino Real. The project would be 100 percent affordable consisting of 15 extremely low-income, 15 very-low-income, and 8 low-income units. Although DTPP standards and guidelines identify a maximum height of four floors/48 feet along El Camino Real, the project applicant would provide affordable housing, thereby qualifying the project for certain bonuses, concessions, and waivers pursuant to the SDBL (Government (Govt.) Code Sections 65915 et. seq.), allowing them to exceed the established height limit (Govt. Code, Section 65915(f)).<sup>4</sup>

The project would be in compliance with all additional applicable DTPP standards and guidelines, including architectural character, public realm, and streetscape. In addition, there are no visually sensitive uses near the project site that would be adversely affected by the project. Therefore, the impact would be less than significant, and there would not be any impacts above those analyzed in the DTPP Program EIR.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

The project would comply with the DTPP lighting design and standards. Additionally, project lighting plans would be subject to City review and approval, and would not be expected to be substantially different than lighting conditions at nearby development along El Camino Real. As a result, the project's incorporation of additional lighting would not adversely affect daytime or nighttime views in the area. Additionally, the project applicant would comply with City Conditions of Approval, which requires development of a lighting plan for proposed exterior lighting, including cut sheets and a diagram showing light spillover. The new light sources must not introduce glare or light effects that spill off the property.

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<sup>4</sup> Exceeding the DTPP height limit is permissible when qualifying for density bonuses pursuant to the State Density Bonus Law.

The project would include the construction of a six-story structure on the proposed parcel. The project is located in the four-story zone and is adjacent to an eight-story zone across El Camino Real. The purpose of the four-story zone is to bring down heights in areas with historic resources, potential shadow concerns, or low-rise neighborhoods. The building at 1322 El Camino Real, known as The Record Man, was evaluated in 2010 by consultants CIRCA, and found eligible as a Redwood City historical resource for “architectural merit and association with early 20th century commercial development in Redwood City.” (JRP 201) The Record Man is located adjacent to the project site just to the southeast. The project site and this historic resource are separated by an existing surface parking lot that would be maintained. Other solar sensitive uses are located directly behind Parcel F along Jackson Street. Specifically, a two-story multi-family residential building borders the project site to the southwest. This existing residential use does include two potentially light sensitive private balconies facing Jackson Street.

As shown in Figure 3.1, Shadow Analysis, the project would not cast shadows on solar sensitive uses that would place them more than 50 percent in shadow at 12:00 p.m. on the Spring Equinox. While the residential uses on Jackson Street would receive limited shadow from the proposed building in the morning, it would not exceed the 50 percent threshold established in the DTPP Program EIR and would be similar to existing conditions. In addition, due to the orientation of The Record Man building to the southeast, this structure would not be subject to substantial shadows from the project, and none that would adversely affect a character-defining feature. Therefore, there would be less-than-significant impacts related to light or glare and shadows, and there would not be any impacts above those analyzed in the DTPP Program EIR.

### 3.1.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase the aesthetic impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### **Mitigation Measures**

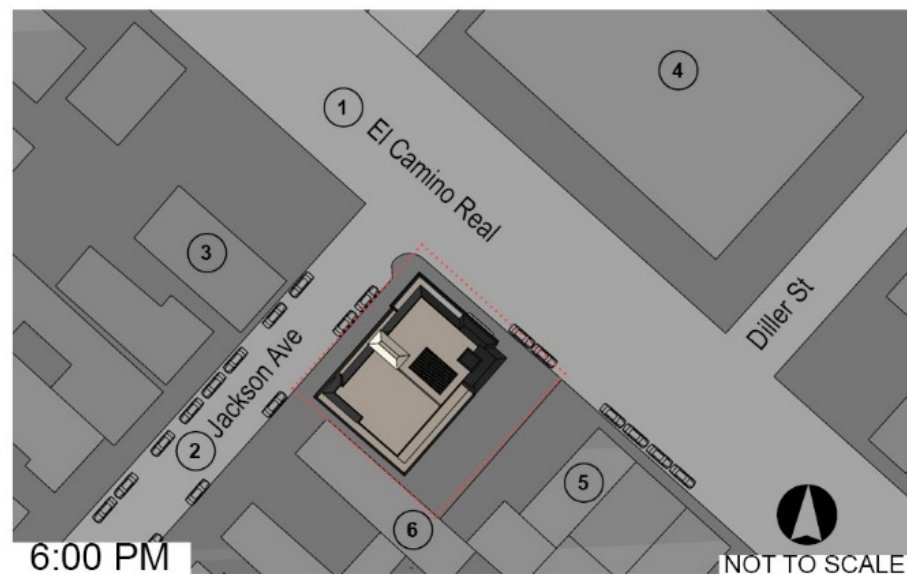
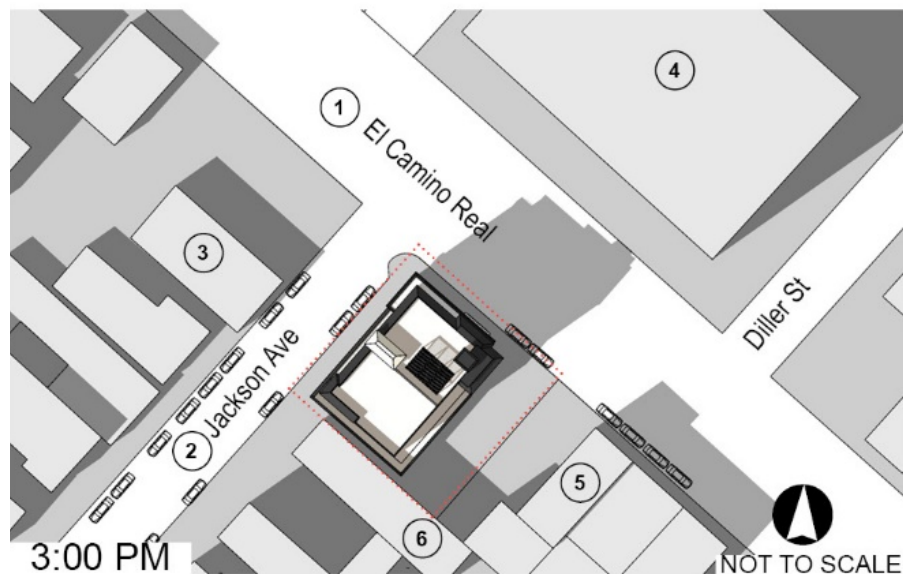
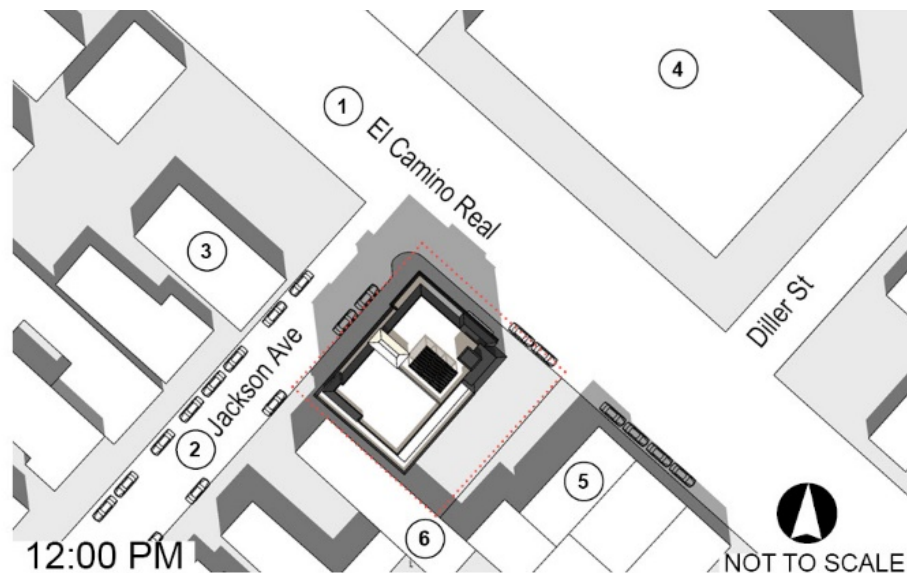
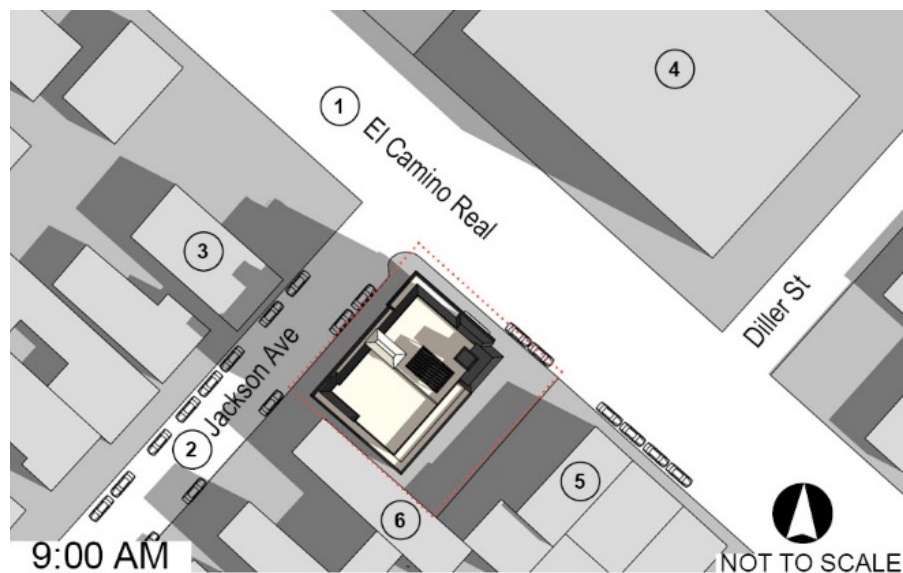
No mitigation would be required.

#### **References:**

California Department of Transportation, 2016. San Mateo County. Officially Designated Scenic Highway Map. Available: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/). Accessed April 17, 2019.

JRP Historical Consulting, LLC (JRP). 2010. *Architectural History and Land Use of the Kaiser Permanente Redwood City Medical Center Study Area*.

# Equinox (MARCH 21/SEPTEMBER 21)



- |                                    |   |
|------------------------------------|---|
| ① El Camino Real                   | ④ 1355 El Camino Real (Huxley Apartments)       |
| ② Jackson Avenue                   | ⑤ 1322 El Camino Real (Record Man)              |
| ③ 1280 El Camino Real (Restaurant) | ⑥ 125 Jackson Avenue (Multi-Family Residential) |

## SHADOW DIAGRAM - EQUINOX (MARCH 21 / SEPTEMBER 21)

1304 El Camino Real CEQA Analysis  
City of Redwood City, California

FIGURE 3.1

## 3.2 Agricultural and Forestry Resources

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>II. Agriculture and Forestry Resources.</b>					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 3.2.1 Program EIR Findings

The DTPP Program EIR identified no agricultural uses within the DTPP implementation area. In addition, the DTPP area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Within the DTPP area, there are no lands zoned for agricultural use or under a Williamson Act contract.

The DTPP Program EIR concluded that there would be no impact to agricultural resources related to DTPP EIR implementation, and no mitigation measures were required or identified.

### 3.2.2 Project Analysis

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b) **Conflict with existing zoning for agricultural use or a Williamson Act contract?**
- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**
- d) **Result in the loss of forest land or conversion of forest land to non-forest use?**
- e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?**

The project site and surrounding area do not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is not zoned for agricultural uses, forestland, timberland, or Timberland Production Zone (San Mateo County, 2014). Additionally, the project site is not encumbered by Williamson Act contracts (California Department of Conservation, 2012).

The project would not convert any farmland to non-agricultural use; convert any forest land to non-forest use; or conflict with existing agricultural or timberland zoning. Therefore, the project would have no impact on agricultural and forest resources beyond those analyzed in the DTPP Program EIR.

### 3.2.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on agricultural and forestry disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation would be required.

#### **References:**

San Mateo County. 2014. San Mateo County Important Farmland 2014. Available: <https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/smt14.pdf>. Accessed March 2019.

California Department of Conservation. 2012. San Mateo County Williamson Act FY 2006/2007. Available: [ftp://ftp.consrv.ca.gov/pub/dlrp/wa/SanMateo\\_06\\_07\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/wa/SanMateo_06_07_WA.pdf). Accessed March 2019.



### 3.3 Air Quality

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>III. Air Quality.</b>					
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.					
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The updated thresholds in Appendix G Environmental Checklist Form (2019) deleted criterion b, "Violate any air quality standard or contribute substantially to an existing or projected air quality violation."

#### 3.3.1 Program EIR Findings

The DTPP Program EIR found that development occurring in conformance with the DTPP would be consistent with the Bay Area Air Quality Management District (BAAQMD) 2010 Clean Air Plan control measures and the BAAQMD CEQA Air Quality Guidelines, because the projected rate of increase in new vehicle trips resulting from the DTPP would be less than the associated projected rate of population growth. Therefore, impacts would be less than significant, with no mitigation measures required.

The DTPP Program EIR also found that development facilitated by the DTPP would generate new vehicle trips and change traffic patterns that could result in high levels of carbon monoxide (CO). However, because intersections affected by the project would have volumes less than the BAAQMD threshold of 44,000 vehicles per hour, the impact of the project on local CO levels would be less than significant.

The DTPP Program EIR also found that impacts from Toxic Air Contaminants (TAC) and particulate matter equal to or less than 2.5 micrometers in diameter (PM<sub>2.5</sub>) exposure and odors associated with mixed-use developments resulting from DTPP implementation would be potentially significant, requiring mitigation measure implementation. The DTPP Program EIR included two mitigation measures for potentially significant impacts resulting from DTPP implementation: Mitigation Measure 12-1 and Mitigation Measure 12-2. Mitigation Measure 12-1 requires residential projects within 500 feet of sources of TACs and PM<sub>2.5</sub> (e.g., El Camino Real,

Caltrain) to include an analysis of potential health risks. Mitigation Measure 12-2 requires DTPP-facilitated food service uses to implement specified odor-reducing measures. The DTPP Program EIR determined that with implementation of the above-mentioned mitigation measures, impacts resulting from TAC and PM<sub>2.5</sub> exposure and odors associated with mixed-use developments would be reduced to less than significant. Mitigation Measure 12-2 would not apply to the proposed project, because the project does not include development of any food service uses.

### 3.3.2 Project Analysis

#### a) Conflict with or obstruct implementation of the applicable air quality plan?

The BAAQMD prepares plans to attain State and National Ambient Air Quality Standards in the San Francisco Bay Area Air Basin. The BAAQMD adopted the 2017 Clean Air Plan: Spare the Air, Cool the Climate on April 19, 2017 (BAAQMD, 2017b). This plan provides a regional strategy to attain State and Federal air quality standards by reducing ozone, PM, and TAC.

Air quality plans identify potential control measures and strategies, including rules and regulations that can be implemented to reduce air pollutant emissions from industrial facilities, commercial processes, on- and off-road motor vehicles, and other sources. The BAAQMD implements these strategies through rules and regulations, grants and incentive programs, public education and outreach, and partnerships with other agencies and stakeholders.

Projects that are consistent with the assumptions used in development of the air quality plan are considered to not conflict with or obstruct the attainment of air quality levels as identified in the plan. Assumptions for emission estimates are based on population, employment, and land use projections, taken from local and regional planning documents. As discussed above in Section 2, Project Description, the project is consistent with the DTPP land use designation and was accounted for in the DTPP Program EIR. Because the project would be developed on a project site that would allow development of a multifamily housing building, the project would be consistent with the development assumptions for land uses and vehicle trips associated with the General Plan land use designation for the site, and the intensity of operational emissions would be accounted for in the air quality plan.

Consistency with the air quality plan also would be determined through evaluation of project-related air quality impacts, and demonstration that project-related emissions would not increase the frequency or severity of existing violations or contribute to a new violation of the National Ambient Air Quality Standards. The BAAQMD CEQA Air Quality Guidelines include thresholds of significance that are applied to evaluate regional impacts of project-specific emissions of air pollutants and their impact on BAAQMD's ability to reach attainment (BAAQMD, 2017c).

As described below in impact (b), project construction-related and operational emissions would not exceed any criteria air pollutant emissions thresholds of significance or screening criteria recommended by the BAAQMD, and would comply with applicable BAAQMD rules and regulations. Because the project would be consistent with the DTPP land use designations and would not exceed the BAAQMD's thresholds of significance, the project would be consistent with the applicable air quality plans. The impact would be less than significant, and the project would have no impact above those analyzed in the DTPP Program EIR.

#### b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

By its very nature, air pollution generally is a cumulative impact. The nonattainment status of regional pollutants results from past and present development, and this regional impact is cumulative rather than attributable to any one source. Per Section 15064(h)(4) of the State CEQA Guidelines, "the existence of significant cumulative impacts caused by other projects alone shall not constitute

substantial evidence that the project's incremental effects are cumulatively considerable." If a project's emissions are below the BAAQMD thresholds of significance or screening criteria, the project is not considered to result in a cumulatively considerable contribution to a significant impact on regional air quality (BAAQMD, 2017c).

The BAAQMD CEQA Air Quality Guidelines are for informational purposes only, and are to be followed by local governments at their own discretion (BAAQMD, 2017c). The CEQA Air Quality Guidelines may inform environmental review for development projects in the Bay Area, but they do not commit local governments or the air district to any specific course of regulatory action. The thresholds for criteria pollutants were developed through a quantitative examination of the efficacy of fugitive dust mitigation measures, and a quantitative examination by the BAAQMD has established construction-related thresholds of significance for criteria pollutants, which are considered the allowable emissions limits for individual projects to avoid impeding the region's ability to attain and maintain ambient air quality standards. In addition, because regional air quality standards have been established for these criteria pollutants to protect the public, with a margin of safety, from adverse health impacts because of exposure to air pollution, these trigger levels also can be used to assess project emissions, and inform the project's impacts on regional air quality and health risks under CEQA.

The BAAQMD CEQA Air Quality Guidelines identify screening criteria to provide lead agencies with a conservative indication of whether a project could result in a potentially significant air quality impact. If all of the screening criteria are met by a project, then the lead agency does not need to perform a detailed air quality assessment of the project's emissions. Table 3.3-1 shows the BAAQMD's screening criteria for the construction and operation of mid-rise apartment homes.

**Table 3.3-1 Construction-Related and Operational Screening Level Sizes**

<b>Land Use Type</b>	<b>Operational Criteria Pollutant Screening Size</b>	<b>Construction-Related Screening Size<sup>1</sup></b>
Apartment, mid-rise	494 dwelling units (NO <sub>x</sub> )	240 dwelling units (ROG)

Notes:

NO<sub>x</sub> = oxides of nitrogen; ROG = reactive organic gases

1. In addition to being below the construction-related screening size, project construction would result in a less-than-significant impact from criteria air pollutant and precursor emissions if the following also is true:

- All basic construction mitigation measures would be included in the project design and implemented during construction; and
- Construction-related activities would not include any of the following:
  - a. Demolition
  - b. Simultaneous occurrence of more than two construction phases
  - c. Simultaneous construction of more than one land use type
  - d. Extensive site preparation
  - e. Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export)

Source: BAAQMD, 2017c

Because the project would not meet the screening criteria identified for operations, the project would not result in generation of operational-related criteria air pollutants and/or precursors that would exceed the BAAQMD-recommended thresholds of significance. However, because the project would involve grading and excavation for the ground-level garage, construction-related activities would not potentially be under the screening criteria identified by the BAAQMD. Therefore, emissions associated with project construction were modeled using the California Emissions Estimator Model Version 2016.3.2 and compared to the applicable BAAQMD thresholds of significance, to determine the potential impacts.



Project construction is anticipated to last approximately 14 months. The analysis assumed material export would require approximately 150 loaded dump truck trips during grading activities. In addition, the analysis assumed approximately 30 concrete truck trips would be required. The analysis also assumed approximately 10 workers would be on the site at any one time. (Refer to EIR Appendix AQTR for model output files and additional details).

Ozone precursor emissions of reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) are associated primarily with construction equipment exhaust. Fugitive PM emissions are associated primarily with fugitive dust generated during site preparation and grading, and vary depending on the soil silt content, soil moisture, wind speed, acreage of disturbance, vehicle travel to and from the construction site, and other factors. PM emissions also are generated by equipment exhaust and re-entrained road dust from vehicle travel on paved and unpaved surfaces.

Table 3.3-2 summarizes the total emissions and average daily emissions of ROG, NO<sub>x</sub>, particulate matter equal to or less than 10 micrometers in diameter (PM<sub>10</sub>) exhaust, and PM<sub>2.5</sub> exhaust associated with project construction. The BAAQMD does not have quantitative mass emissions thresholds for fugitive PM<sub>10</sub> and PM<sub>2.5</sub> dust. Instead, the BAAQMD recommends that all projects, regardless of the level of average daily emissions, implement applicable best management practices (BMPs), including those listed as Basic Construction Measures in the BAAQMD CEQA Guidelines (BAAQMD, 2017c). Therefore, implementation of the Basic Construction Measures would be required.

**Table 3.3-2 Summary of Construction-Related Emissions**

Construction Year	Emissions			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
2020 Emissions (tons/year)	0.02	0.12	2.33E-03	2.29E-03
2021 Emissions (tons/year)	0.25	0.31	6.93E-03	6.81E-03
Total Emissions	0.264	0.429	0.009	0.009
Average Daily Emissions (lb/day) <sup>2</sup>	<b>1.7</b>	<b>2.8</b>	<b>0.1</b>	<b>0.1</b>
BAAQMD Significance Threshold	54	54	82	<b>54</b>
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Notes: lb/day = pounds per day; NO<sub>x</sub> = oxides of nitrogen; BAAQMD = Bay Area Air Quality Management District; PM<sub>10</sub> = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; PM<sub>2.5</sub> = respirable particulate matter with an aerodynamic diameter of 2.5 micrometers or less; ROG = reactive organic gases

<sup>1</sup> PM<sub>10</sub> and PM<sub>2.5</sub> construction-related emissions and thresholds represent exhaust emissions only.

<sup>2</sup> Average daily emissions are calculated based on an average of 22 working days per month over a 14-month construction period.

See EIR Appendix AQTR for detailed modeling assumptions, outputs, and results.

Source: Data compiled by AECOM in 2019

As shown in Table 3.3-2, the estimated average daily emissions that would be generated during project construction would not exceed the BAAQMD thresholds. In addition, the proposed construction activities would be implemented in accordance with all applicable regulatory requirements, including the BAAQMD's Basic Construction Measures (as follows below), which would reduce construction-related fugitive dust and exhaust emissions.

**Construction-Related Emissions.** The following construction measures, as periodically amended by BAAQMD, are required for all proposed development projects to reduce construction-related fugitive dust and exhaust emissions:

- (A) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily.*
- (B) All haul trucks transporting soil, sand, or other loose material off site shall be covered.*
- (C) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
- (D) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.*
- (E) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.*
- (F) Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by California airborne toxics control measure Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.*
- (G) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.*
- (H) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number also shall be visible to ensure compliance with applicable regulations.*

The project is below the screening criteria for operations, and would result in construction-related emissions below significance thresholds as identified by the BAAQMD. Therefore, project construction and operation would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, the impact would be less than significant, and there would be no impact above what was analyzed in the DTPP Program EIR.

**c) Expose sensitive receptors to substantial pollutant concentrations?**

Sensitive receptors refer to those individuals of the population most susceptible to poor air quality: children, the elderly, and those with pre-existing serious health problems affected by air quality. Examples of receptors include residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities. The nearest sensitive receptors to the project site are the immediately adjacent residences.

**Construction-Related and Operational Criteria Air Pollutant Emissions:** As shown in Table 3.3-2, project construction would result in emissions of criteria air pollutants, but at levels that would not exceed the BAAQMD thresholds of significance. In addition, project operations would be below the BAAQMD-recommended screening criteria (as shown in Table 3.3-1), indicating that the project would not result in generation of operational-related criteria pollutants and/or precursors that would exceed the thresholds of significance. The thresholds of significance were designed to identify those projects that would result in significant levels of air pollution, and to assist the region in attaining the applicable State and Federal ambient air quality standards, which were established using health-based criteria to protect the public with a margin of safety from adverse health impacts from exposure to air pollution. Therefore, the construction-related and operational criteria air pollutant emissions associated with the project would not expose sensitive receptors to substantial pollutant concentrations.

**Construction-Related and Operational Toxic Air Contaminant Emissions:** The greatest potential for TAC emissions would be related to diesel PM emissions, associated with the activity of heavy-duty construction equipment.

The total duration of construction activities is anticipated to be approximately 14 months; the exposure of sensitive receptors to construction emissions would be short term, intermittent, and temporary. The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the maximally exposed individual. Therefore, the risks estimated for such an individual are higher if a fixed exposure occurs over a longer period. Health effects from TACs often are described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs (OEHHA, 2015).

Project construction activities would vary in activity and equipment intensity over the project duration, thereby limiting exposure of most sensitive receptors to substantial TAC concentrations. However, the nearest sensitive receptors would be residences approximately 1.5 feet to the west of the project site boundary. In accordance with the requirements of the DTPP Program EIR Mitigation Measure 12-1, a project-specific health risk assessment (HRA) was conducted to identify “Mitigation measures that comply with the adopted standards of the BAAQMD for control of odor/toxics for sensitive receptors to reduce these risks to acceptable levels”. (Refer to EIR Appendix AQTR for the detailed HRA analysis). In sum, the HRA indicated that construction activity could expose nearby sensitive receptors to substantial TAC emissions and result in a potentially significant impact. As such, in accordance with Mitigation Measure 12-1 and the currently applicable BAAQMD standards, construction activities would be required to employ Tier 4 technology for all equipment greater than 50 horsepower (hp). In addition, implementation of the BAAQMD’s Basic Construction Measures, as discussed under item 4.1(b) above, also would reduce diesel PM emissions during construction by limiting idling times and ensuring that construction equipment would be tuned properly to manufacturers’ specifications. As a result, the health risk impact during construction would be less than significant, and there would be no impact above what was analyzed in the DTPP Program EIR.

Project operation would involve residential land uses that would not be a substantial source of TACs and/or PM<sub>2.5</sub> emissions. Furthermore, the California Supreme Court determined in 2015 that CEQA does not require an analysis of how the existing environment may affect a project’s future users or residents (*California Building Industry Association v. Bay Area Air Quality Management District* 62 Cal. 4th 369). The project would also implement Mitigation Measure 12-1 as outlined in the DTPP Program EIR, which requires the installation of HVAC and filtration systems to reduce any potential impacts. Therefore, the impact would be less than significant and the project would have no impacts above those identified in the DTPP Program EIR.

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. Although offensive odors rarely cause any physical harm, they can be very unpleasant, leading to considerable distress among the public, and causing citizens to submit complaints to local governments and regulatory agencies. Typical facilities that generate odors include wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, and food processing facilities. The project would not propose any of these types of odor-generating facilities.

Project construction activities could result in short-term odor emissions from diesel exhaust associated with construction equipment. The project would use typical construction techniques, and the odors would be typical of most construction sites, and temporary in nature. The land uses associated with the project would be residential, which typically are not a generator of odor

emissions. Therefore, the project would not create objectionable odors affecting a substantial number of people. The impact would be less than significant, and the project would have no impacts above those identified in the DTPP Program EIR.

### 3.3.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase the air quality disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

As detailed above, all diesel-fired construction equipment greater than 50 hp will be Tier 4 final, and all remaining diesel-fired equipment will be Tier 3 with diesel Tier 3 particulate filters. BAAQMD's Basic Construction Measures will be applied to reduce construction-related fugitive dust and exhaust emissions.

#### **Mitigation Measures**

**Mitigation Measure 12-1.** Unless and until the same or equivalent measures are adopted with a New General Plan, the following Draft New General Plan policy and programs shall be implemented for new development within the DTPP area located within 500 feet of El Camino Real, Veterans Boulevard and the Caltrain railway (until Caltrain electrification is completed), unless BAAQMD-approved modeling demonstrates that the measures called for in the policy and programs are unnecessary because exposure to TACs and PM" would be less than the BAAQMD thresholds of significance:

- Require all land uses proposed within 500 feet of U.S. 101, El Camino Real, and Woodside Road that will house, accommodate or serve sensitive receptors to incorporate appropriate design and construction features (e.g., filters on HVAC systems) that reduce potential exposure of persons to pollutants. (Draft New General Plan Policy PS-2.6)
- Sensitive Receptor Protection. Increase protection of sensitive receptors (facilities where individuals are highly susceptible to the adverse effects of air pollutants, such as housing, child care centers, retirement homes, schools, and hospitals) near high-volume roadways, dry cleaners using perchloroethylene, large gas stations, the Port of Redwood City, and rail yards. Amend the Zoning Ordinance and other regulations to require mitigation measures such as increased indoor air filtration to increase the protection of sensitive receptors near major emission sources. (Draft New General Plan Program PS-7)
- Sensitive Receptor Siting Requirements. Require projects proposed within 500 feet of high-volume roadways and that house or accommodate sensitive receptors to include an analysis of the potential health risks. Mitigation measures that comply with adopted standards of the BAAQMD for control of odor/toxics for sensitive receptors shall be identified in order to reduce these risks to acceptable levels. (Draft New General Plan Program PS-8)

#### **References:**

- Bay Area Air Quality Management District (BAAQMD). 2011. *Highway Screening Analysis Tool, San Mateo County*. Available: <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
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- . 2017a. *Air Quality Standards and Attainment Status*. Available: <http://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status>.

- . 2017b. 2017. *Clean Air Plan: Spare the Air, Cool the Climate*. Available: [http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a\\_-proposed-final-cap-vol-1-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en).
- . 2017c. *California Environmental Quality Act Air Quality Guidelines*. Available: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en).
- . 2019. *San Mateo County*. Available: <http://www.baaqmd.gov/about-the-air-district/in-your-community/san-mateo-county>.
- California Air Resources Board (ARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Available: <https://ww3.arb.ca.gov/ch/handbook.pdf>.

## 3.4 Biological Resources

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>IV. Biological Resources. Would the project:</b>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 3.4.1 Program EIR Findings

The DTPP Program EIR found that future DTPP-facilitated development adjacent to Redwood Creek may result in the loss of special-status northern coastal salt marsh community and special-status species, and affect potential jurisdictional wetland habitat, resulting in a potentially significant impact requiring Mitigation Measure 15-1 and Mitigation Measure 15-2. Mitigation Measure 15-1 requires that for projects adjacent to Redwood Creek, the project applicant or City consult with U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (CDFW), and comply with the Redwood City Stormwater Management & Discharge Control Program. Mitigation Measure 15-2 requires the project applicant to obtain all required permits and approvals from the U.S. Army Corps of Engineers, CDFW, and the Regional Water Quality Control Board (RWQCB). The DTPP Program EIR found that with implementation

of Mitigation Measure 15-1 and Mitigation Measure 15-2, the impacts to Redwood Creek habitat and species would be reduced to a less-than-significant level.

The DTPP Program EIR also found that future development in the DTPP area would replace remaining existing vegetative wildlife habitats with new structures and landscaping. However, due to the generally low wildlife habitat value and the limited extent of sensitive natural communities, the impact of the DTPP-facilitated development on vegetation and wildlife values in the plan area is considered to be less than significant.

The DTPP Program EIR concluded that DTPP implementation could impact nesting birds, representing a potentially significant impact. Mitigation Measure 15-3 requires that all tree removal and trimming take place outside of the breeding season, or that a qualified biologist conduct a survey for nesting birds prior to tree removal or trimming. The DTPP Program EIR concluded that with implementation of Mitigation Measure 15-3, impacts would be reduced to less than significant.

The DTPP Program EIR also concluded that DTPP implementation could impact heritage trees as defined by the City's Tree Preservation Ordinance (Chapter 35 of the Municipal Code), resulting in a potentially significant impact. Mitigation Measure 15-4 requires that any project that would involve the removal of any tree shall complete the application and review process specified in the City's Tree Preservation Ordinance (Municipal Code chapter 35) prior to project approval. The DTPP Program EIR concluded that with implementation of Mitigation Measure 15-4, impacts would be reduced to less than significant.

### 3.4.2 Project Analysis

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Plants:** Two special-status plant species were identified in the 2-mile California Natural Diversity Database (CNDDDB) search: San Mateo thorn-mint, and Crystal Springs fountain thistle. Both are Federal and State Endangered species, with a rare plant ranking of 1B.1, based on the review of the California Native Plant Society On-Line Inventory. San Mateo thorn-mint is found on serpentine soils in chaparral and grassland communities. The closest observation of San Mateo thorn-mint is 1.4 miles away from the project site. The Crystal Springs fountain thistle is also found on serpentine soils in wetlands and seeps in chaparral, grassland, and wetland-riparian communities. The closest observation of the Crystal Springs fountain thistle is 1.9 miles away from the project site.

According to the USFWS Information for Planning and Consultation (IPaC) search, two additional plant species were identified: Marin dwarf flax, and the Showy Indian clover. The Marin dwarf flax is a Federal and State Threatened species, with a 1B.1 rare plant ranking. It occurs on serpentine soils in chaparral and grassland communities. The Showy Indian clover is Federally Endangered, with a 1B.1 rare plant ranking. It often is found in wetlands within grassland and wetland-riparian communities.

Because of the developed and urbanized conditions at the project site and surrounding area, there is no potential for special-status plant species to occur in the project site due to the absence of habitat. Therefore, there would be no impact on special-status plants in relation to construction or operation of the proposed project beyond those analyzed in the DTPP Program EIR.

**Reptiles and Amphibians:** There have been five occurrences of San Francisco garter snake identified within 2 miles of the project site in the CNDDDB search. The San Francisco garter snake, a Federal and State Endangered species, occurs in grassland and open coastal scrub habitat in proximity to aquatic features such as marshes, wetlands, and riparian corridors on the Bay Area Peninsula.

According to the USFWS IPaC search, three additional reptile and amphibian species were identified: green sea turtle, California red-legged frog, and California tiger salamander. These three species are all Federally Threatened.

The lack of suitable habitat for these species in the project site and the lack of habitat connectivity to other suitable areas renders it unlikely that these species would be present on the project site. All four of these species are associated with aquatic and/or wetland features, which are not present within the project site. Therefore, there would be no impact on special-status reptiles and amphibians in relation to the construction or operation of the proposed project beyond those analyzed in the DTPP Program EIR.

**Birds:** Four special-status bird species were identified in the 2-mile CNDDDB search: Western snowy plover, Ridgeway's rail, California least tern, and American peregrine falcon. The western snowy plover is a Federal and State Threatened species of shorebird found in the tidal marshes and coastal shorelines with beaches. The Ridgeway's rail is a Federal- and State-Endangered species of secretive marsh bird found in the coastal tidal marshes of the San Francisco Bay and greater area. California least tern is a Federal and State Threatened species, with seasonal occurrence in the San Francisco Bay Area during the breeding season. This species is primarily found on coastal beaches and along open shorelines with tidal influence. American peregrine falcons are Federal and State delisted due to recovery, and therefore only protected while nesting (see nesting birds). Habitat for these four species is not present within the project site.

According to the USFWS IPaC search, marbled murrelet and the yellow-billed cuckoo were also identified as potentially occurring in the project vicinity. The marbled murrelet is Federally Threatened and State Endangered, found in old-growth redwood forest. The yellow-billed cuckoo is State Endangered, and the western distinct population is Federally Threatened. This species lives in dense woody areas. Neither of the habitats required for these species is present within the project site.

The lack of suitable habitat for these species in the project site render it unlikely that these species would be present within the project site, especially for nesting. Therefore, there would be no impact on special-status birds in relation to the construction or operation of this proposed project beyond those analyzed in the DTPP Program EIR.

**Nesting Birds:** The proposed project would include tree removal, and nesting birds may be present in the existing trees and foliage in and surrounding the project site. Therefore, if tree removal were to occur during the nesting season (February 1 through August 31), nesting birds could be disturbed. Nesting birds, their nests, and their eggs are fully protected by California Fish and Game Code Sections 3503 and 3503.5, and the federal Migratory Bird Treaty Act. The lack of natural nesting habitats in urban areas tends to result in resident and migratory birds nesting in ornamental and/or street trees and on structures. Project development would be subject to the Migratory Bird Treaty Act, and there are on-site and street trees potentially used by nesting birds. Any disturbance to nesting birds during nesting season would be considered a potentially significant impact; therefore, the project would implement Mitigation Measure 15-3, as outlined in the DTPP Program EIR. With incorporation of pre-construction surveys called for by Mitigation Measure 15-3, the project would have less-than-significant impacts on nesting birds.

**Mammals:** Both the CNDDDB search and USFWS IPaC search identified one special-status mammal species: the salt marsh harvest mouse. The salt marsh harvest mouse is a listed Federal and State Endangered species that only occurs in the brackish tidal and salt marshes of the San Francisco Bay Area and has a strong habitat association with tidal wetlands and stands of pickleweed. This species has no potential to occur in the project site because tidal wetlands are absent. Therefore, the project would have no impact on mammals beyond those analyzed in the DTPP Program EIR.

**Bats:** No special-status bat species were identified in the 2-mile CNDDDB project vicinity search or USFWS IPaC search.



Bats are protected by Fish and Game Code 4150, which states: “all mammals occurring naturally in California which are not game mammals, fully protected mammals, or fur-bearing mammals, are non-game mammals. Non-game mammals or parts thereof may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the Commission.” Bats are primarily protected through environmental review under CEQA. Bat species without candidate, sensitive, or special status, but with some potential to use the project site, include the big brown bat, Brazilian free-tail bat, and Yuma myotis. These bat species are widely distributed throughout California, and occur in a variety of habitats, from man-made structures such as mines, bridges, and buildings, to natural habitats such as caves, rock outcrops, and trees. Tree-roosting bats would roost in tree snags or live trees supporting cavities, crevices, or loose bark. There are no potential bat roosting areas present at the project site and the site does not contain preferred foraging areas near riparian corridors or Redwood Creek. Additionally, the surrounding residential/developed areas diminish the quality of ideal habitat for these bat species due to their sensitivity to disturbance and project development, and would result in little change to the existing condition of the surfaces on the site. Therefore, due to the lack of bat habitat being affected by the proposed project, the potential for disturbance to roosting sites from construction and operation of the proposed project would have a low potential to occur. Therefore, project impacts would be less than significant.

**Invertebrate and Fish Species:** The CNDDB search identified no special-status invertebrates or fish species in the project vicinity within a 2-mile search. However, delta smelt, Bay checkerspot butterfly, and San Bruno elfin butterfly were identified in the USFWS IPaC search. The delta smelt is a Federally Threatened and State Endangered fish species found in brackish water. The Bay checkerspot butterfly is a Federally Threatened species that depends on the host plant dwarf plantain and purple owl's clover, which are found on serpentine soil. The San Bruno elfin butterfly is a Federally Endangered species found on rocky outcrops and cliffs. There is no suitable habitat for these three species within the project site.

These species would not be expected to occur at the project site, and there would be no impact on special-status fish or invertebrates in relation to construction or operation of the proposed project beyond those analyzed in the DTPP Program EIR.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

*The following discussion addresses items b) and c).*

The project site is entirely developed and does not contain any riparian habitats or other sensitive natural communities. Additionally, the project site does not contain any federally protected wetlands. Therefore, the project would have no impact, and would not have any impacts above those analyzed in the DTPP Program EIR.

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Habitat corridors facilitate the movement between wildlife populations in more remote areas, and populations in larger habitat areas. Wildlife movements include seasonal migration (unidirectional), inter-population movement, and short- or home-range travel pathways (i.e., movement corridors in an animal's territory for mating or foraging). These wildlife corridors are important for providing connection between outlying populations, and for daily home-range activities, such as foraging, hunting, or escape from predators.

The Don Edwards National Wildlife Refuge on Bair Island and the San Francisco Bay are within proximity to the project site, and provide the nearest locations for suitable habitat of native resident or migratory wildlife species, such as migratory birds. The ability of the project site to function as a significant wildlife corridor is limited due to its small size (approximately 6,500 square feet) and the extensive urbanization within the project boundary and surrounding area. Wildlife adapted to urban environments that are likely to use migratory pathways in the project site includes raccoon, striped skunk, opossum, and potentially gray fox.

Overall, project development would result in little change to the existing condition of the surfaces on the site. Additionally, the project would be subject to, and would comply with, Federal and State migratory bird regulations and roosting bat regulations; therefore, the project development would not interfere with the movement of native resident or wildlife species, or with established native resident or migratory wildlife corridors. This project would have no impact, and would not have any impacts above those analyzed in the DTPP Program EIR.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

According to the project-specific Arborist Report (Attachment ABR), there are four trees on the project site representing three species: evergreen pear tree, two Hollywood juniper trees, and Bradford pear tree. All but the Bradford pear tree are in good condition; the Bradford pear tree is in poor condition.

The project would comply with the City's Municipal Code (Chapter 29 – Street Tree Ordinance, and Chapter 35 – Tree Preservation Ordinance), the Significant Tree Ordinance of San Mateo County (Part Three of Division VIII of the San Mateo County Ordinance Code); and Regulations for the Preservation, Protection, Removal, and Trimming of Heritage Trees on Public and Private Property (Ordinance Number 2427). Protected trees include landmark trees, street trees, significant trees, indigenous trees, or heritage trees on private or public property anywhere within the territorial limits of the City (Redwood City, 2019). The evergreen pear tree is the only tree that meets the definition of a protected tree as outlined by Redwood City Municipal Code. As shown in the project's landscaping plans, the project would include tree replanting. Tree protection fencing would also be implemented. The project would also comply with the City's Conditions of Approval, which requires that a tree removal permit be obtained prior to removal of any trees.

With incorporation of local regulation and arborist recommendations, the project would have a less-than-significant impact regarding conflicts with local policies or ordinances protecting biological resources, and would not have any impacts above those analyzed in the DTPP Program EIR.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans covering the project area. Therefore, construction or operation of the proposed project would have no impact on, or conflict with, habitat conservation plans in the area beyond those analyzed in the DTPP Program EIR.

### 3.4.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on biological resources disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR. The project would implement Mitigation Measure 15-3 as outlined in the DTPP Program EIR.

***Mitigation Measures***

**Mitigation Measure 15-3.** All tree removal and trimming, as well as ground disturbing activities, shall be scheduled to take place outside of the breeding season (February 15 to August 31). If construction is unavoidable during this time, a qualified biologist shall conduct a survey for nesting birds no more than three days prior to the removal or trimming of any tree and prior to the start of ground disturbing activities. If active nests are not present, project activities can proceed as scheduled. If active nests of protected species are detected, a buffer will be established around the nest, based on consultation with CDFW, and based on CDFW standards, which buffer shall remain in place until the City has determined, in consultation with a qualified biologist, that the buffer is no longer necessary to avoid significant impacts to the nest. This measure would reduce the potential impacts of the DPP related to migratory wildlife to a less-than-significant level.

**References:**

California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB). 2019. Data request for 2 miles surrounding project area. Accessed August 6, 2019.

AECOM. 2019. Preliminary Arborist Report. South Main Mixed-Use Development Project Tree Inventory. June 27, 2019.

Redwood City Code and Ordinances. 2019. Tree Preservation Ordinance, Redwood City Rules and Regulations.

United States Fish and Wildlife (USFWS). 2019. Information for Planning and Conservation (IPaC).

Western Bat Working Group (WBWG). 2017. Western Species Accounts. Accessed at [http://www.wbwg.org/species\\_accounts](http://www.wbwg.org/species_accounts).

## 3.5 Cultural Resources

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>V. Cultural Resources. Would the project:</b>					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the time of the DTPP Program EIR, paleontological resources were analyzed under Cultural Resources in criterion c. This threshold was moved to geology per the CEQA Appendix G Environmental Checklist Form update (2019). The analysis provided in the DTPP Program EIR for paleontological resources is addressed in Section 3.7, Geology and Soils.

### 3.5.1 Program EIR Findings

The DTPP Program EIR found that impacts to archaeological resources would be potentially significant due to potential disturbance of previously unrecorded resources. As a result, Mitigation Measure 7-1 was required, which outlined that in the event any deposits of prehistoric or historic archaeological materials are encountered during project construction activities, all work within an appropriate buffer area shall be stopped, and a qualified archaeologist meeting criteria under 36 Code of Federal Regulations (CFR) 61 shall be contacted to assess the deposit and make recommendations, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery. The DTPP Program EIR concluded that with implementation of Mitigation Measure 7-1, impacts to archaeological resources would be reduced to less than significant.

The DTPP Program EIR also found that impacts to historical resources related to the built environment would be potentially significant for development of properties that contain historic resources, or are adjacent to historic resources or historic districts. As a result, three mitigation measures were required: Mitigation Measure 7-2 requires that properties containing a historic resource make a preliminary determination on whether a project may have a potentially significant adverse effect on the historic resource; Mitigation Measure 7-3 requires properties within or adjacent to a historic district to be reviewed for their potential to impact the historic district; and Mitigation Measure 7-4 requires properties adjacent to a historic resource to be reviewed for its potential to impact the historic resource. The DTPP Program EIR determined that even with implementation of Mitigation Measure 7-2, potential impacts on properties that contain historic resources would remain significant and unavoidable.

### 3.5.2 Project Analysis

**a) Cause a substantial adverse change in the significance of a historical resource pursuant to in Section 15064.5?**

The project site does not include any DTPP-identified historic resources, nor is it located within or adjacent to a historic district. The building at 1322 El Camino Real (The Record Man), which is considered a Redwood City historical resource based on an evaluation conducted in 2010 and as identified in the DTPP Program EIR, is approximately 60 feet southeast of the project site, and is physically separated by a surface parking lot.

In accordance with Mitigation Measure 7-4 from the DTPP Program EIR, a Historical Resource Inventory and Evaluation Report was completed for the proposed project that evaluated its potential impact on the physical integrity of The Record Man shop (Attachment CUL). The report concluded the project would not affect the integrity of 1322 El Camino Real related to setting, feeling, and association. The construction of the six-story, 66-foot-high building at 1304 El Camino Real would not result in the physical demolition, destruction, relocation, or alteration of the 1322 El Camino Real building or its immediate surroundings to such an extent that the significance of the historical resource would be materially impaired (AECOM, 2019). Therefore, the project would have a less-than-significant impact, and would not have any impacts above those analyzed in the DTPP Program EIR.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

Archaeological resources are not known to exist on the project site. However, it is possible that earth-disturbing project construction activities could inadvertently discover previously unrecorded subsurface archaeological resources. Therefore, the project would implement Mitigation Measure 7-1 of the DTPP EIR. Mitigation Measure 7-1 would reduce the potential impacts of the project on archaeological resources to a less-than-significant level, and the project would not have any impacts above those identified in the DTPP Program EIR.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

No human remains are known to exist on the project site. However, the lack of surface and record indications does not preclude the possibility that human remains could be present, and inadvertently encountered and damaged, during project construction. Should any human remains be found during on- or off-site improvements associated with the proposed project, the City of Redwood City Cultural Resources Management Plan guidelines and Mitigation Measure 7-1 require that construction activities be halted immediately, and the County Coroner and a professional archaeologist be consulted to evaluate the significance of the find. If the remains are Native American, the Native American Heritage Commission is required to be notified. With implementation of existing regulations and Mitigation Measure 7-1, project impacts would be less than significant, and the project would not have any impacts above those identified in the DTPP Program EIR.

### 3.5.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on cultural resources disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

The project would implement Mitigation Measure 7-1 as presented in the DTPP Program EIR.

### ***Mitigation Measures***

**Mitigation Measure 7-1.** Implementation of the following mitigation measures would reduce potential impacts to undiscovered archeological resources to a less-than significant level:

In the event that any deposit of prehistoric or historic archeological materials is encountered during project construction activities, all work within an appropriate buffer area around the discovery shall be stopped, and a qualified archeologist meeting federal criteria under 36 CFR 61 shall be contacted to assess the deposit(s) and make recommendations. If deposits of prehistoric or historic archaeological materials cannot be avoided by project activities, the City Planning, Housing, and Economic Development Department shall confirm that the project applicant(s) have retained a qualified archaeologist to evaluate the potential historic significance of the resource(s).

If the deposits are determined to be non-significant by a qualified archeologist, avoidance is not necessary. If the deposits are determined to be potentially significant by the qualified archeologist, the resources shall be avoided if feasible. If the City determines that avoidance is not feasible, project impacts shall be mitigated in accordance with the recommendations of the qualified archaeologist, in coordination with the City Planning, Housing, and Economic Development Department and CEQA Guidelines Section 15126.4 (b)(3)(C), which requires implementation of a data recovery plan. The data recovery plan shall include provisions for adequately recovering all scientifically consequential information from and about any discovered archaeological materials, and include recommendations for the treatment of these resources. In-place preservation of the archaeological resource is the preferred manner of mitigating potential impacts, because it maintains the relationship between the resource and the archaeological context. In-place preservation also reduces the potential for conflicts with the religious or cultural values of groups associated with the resource. Other mitigation options include, but are not limited to, the full or partial removal and curation of the resource. The City Planning, Housing, and Economic Development Department shall confirm that the project applicant(s) have retained a qualified archaeologist for the preparation and implementation of the data recovery plan, which shall be conducted prior to any additional earth-moving activities in the area of the resource. The recovery plan shall be submitted to the project applicant, the City Planning, Housing, and Economic Development Department, and the Northwest Information Center (NWIC). Once the recovery plan is reviewed and approved by the City Planning, Housing, and Economic Development Department and any appropriate resource recovery completed, project construction activity within the area of the find may resume. A data recovery plan shall not be required for resources that have been deemed by the NWIC as adequately recorded and recovered by studies already completed.

(b) Prior to the issuance of grading permits within the DTPP area, the City Planning, Housing, and Economic Development Department shall confirm that any development applicant has required all construction crews to undergo training for the identification of federal or state-eligible cultural resources, and that the construction crews are aware of the potential for previously undiscovered archaeological resources within the plan area; of the laws protecting these resources and associated penalties; and of the procedures to follow should they discover cultural resources during project-related work. All future individual development projects proposed in the DTPP area will be subject to applicable CEQA review and evaluation requirements; and to the extent that such projects are found to have the potential to disturb or destroy archaeological resources, appropriate mitigation measures would be required to address any identified significant impacts.

### **References:**

AECOM. 2019. Addendum Historical Resource Inventory and Evaluation Report & Historical Impacts Analysis. Accessed July 2019.

## 3.6 Energy

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>VI. Energy. Would the project:</b>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Energy was added to the CEQA Guidelines thresholds in Appendix G in 2019, after the DTPP Program EIR was written and certified in 2010.

### 3.6.1 Program EIR Findings

Energy impacts were not specifically identified in the DTPP Program EIR. However, the DTPP Program EIR found that DTPP implementation would result in energy demands from construction and operation activities of future projects. Such actions include demolition, construction, transportation of people and goods, heating, ventilation and air conditioning, lighting, and other associated energy needs. The DTPP Program EIR determined that development associated with the DTPP would be required to comply with Title 24, and would not result in the use of energy in a wasteful, inefficient, or unnecessary manner. The DTPP Program EIR also found that impacts related to consumption of non-renewable and slowly renewable resources as a result of DTPP implementation is considered less than significant, because DTPP associated development projects would not use unusual amounts of energy or construction materials.

### 3.6.2 Project Analysis

#### a) Result in potentially significant environmental impact due to wasteful, inefficient, unnecessary consumption of energy resources, during project construction or operation?

**Construction:** Project construction would include the operation of construction vehicles, as well as debris removal. During project construction, equipment operation would comply with BAAQMD standards that are aimed at reducing air pollution. Such standards, including minimizing idling, ensuring proper maintenance, and using the required tier level engines, would also minimize the potential wasteful consumption of energy resources during construction. Additionally, the project would comply with the City's Construction and Demolition Debris Program, which requires the diversion of 100 percent of inert solids (asphalt, brick, concrete, dirt, rock, sand, soil, and stone) from landfill for all demolition projects; and a minimum of 65 percent of all other construction and demolition debris from new construction, roofing, and alterations / additions (Redwood City, 2019). With implementation of existing standards, the project would not result in additional wasteful or unnecessary consumption of energy during construction. Impacts would be less than significant, and the project would not have any impacts above those identified in the DTPP Program EIR.

**Operation:** The project would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. Title 24 requires that the project meet a number of conservation standards, including installation of



water-efficient fixtures and energy-efficient appliances. Title 24 also regulates energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings, and is enforced by the City of Redwood City. Compliance with Title 24 would ensure reduction in the use of fuel, water, and energy by the proposed project or variant. Furthermore, the project would comply with CALGreen<sup>5</sup> and the City of Redwood City Municipal Code requirements related to energy and water conservation. Redwood City was ahead of state action in adopting commercial and residential Green Building Codes in 2009 that are equivalent to the state CALGreen Tier 1 energy and water use performance standards.

The project would also provide features that encourage alternative modes of transportation, such as bicycle racks and greater pedestrian connectivity. Because the project is an infill residential development in a transit-rich area, the project provides opportunities to limit vehicle trips and the associated energy demand. The project would be consistent with the goals of the Plan Bay Area 2040 land use strategy, which seeks to reduce per capita vehicle miles traveled (VMT). Specifically, project operation would provide opportunities to minimize VMT through the use of public transit and nonmotorized modes of transportation (e.g., walking and biking) to reach employment destinations and amenities. Impacts would be less than significant, and the project would not have any impacts above those identified in the DTPP Program EIR.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

The City's 2013 Climate Action Plan (CAP) was developed to reduce GHG emissions by implementing various strategies and programs at the local level. The CAP identifies the City's existing GHG inventory, and estimates emissions for the year 2020 under different scenarios. Based on the analysis performed for the CAP, the City adopted emission reduction targets to help meet Assembly Bill (AB) 32's regional goals. The CAP recommends various renewable energy, energy-efficiency, and energy conservation strategies over the 15-year period from 2005 to 2020, including policies that are applicable to the project. The project would be consistent with the City's CAP, because it would achieve CALGreen Tier 1 energy performance. The City would implement several other energy efficiency measures, including the following:

- Update building code to mandate higher building performance in residential buildings. Mandate achievement of CALGreen Tier 1 energy performance.
- Adopt Bay Area Water Supply and Conservation Agency Indoor Ordinance and enhance its Outdoor Ordinance.

The City of Redwood City General Plan identifies the following policies as they relate to energy efficiency that would be applicable to the project:

- NR-4.1: Support energy efficiency through the City's Municipal Code Green Building Ordinance.
- NR-4.4: Pursue efforts to reduce energy consumption through appropriate energy conservation and efficiency measures throughout all segments of the community.

As shown in Table 3.6-1 below, the project would be consistent with energy efficiency policies.

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<sup>5</sup> CalGreen is the mandatory building standards code adopted in California; California Code of Regulations, Title 24, Part 11.

**Table 3.6-1 Energy Efficiency Policies**

<b>Measure</b>	<b>Description</b>	<b>Project Consistency with Applicable Measures</b>
EM1 Energy Efficient Public Lighting Program	Replace street, parks, and parking lot lighting with efficient lighting (LEDs, induction, etc.).	<b>Consistent.</b> The project will propose LED lighting for all public spaces and street lights.
WC1 Raise Solid Waste Diversion Rate	Increase participation in recycling programs and ensure weekly collection of recyclables and organic waste to achieve an 85% waste diversion goal by 2020.	<b>Consistent.</b> Redwood City is implementing a series of programs for recycling materials that reduce the amount of waste the City sends to landfills. Current services for residential users include weekly soil waste collection, single stream recycling, organics recycling, plant materials recycling, and household batteries and cell phone recycling.  Additionally, the project would comply with AB 1826—requiring businesses and multifamily residential uses of 5 or more units to recycle organic waste—and SB 1018—requiring businesses that generate 4 cubic yards or more of commercial solid waste per week to arrange for recycling services.
EC1 Commercial Green Building Ordinance	Update building code to mandate higher building performance in commercial buildings. Mandate achievement of CALGreen Tier 1 energy performance. Consider additional mandatory requirements such as solar hot water or cool roofs. Seek to harmonize with regional Green Building Ordinances.	<b>Consistent.</b> The City does not require implementation of the voluntary CALGreen energy standards. However, the project would replace the existing building with a newer, more energy-efficient residential structures. The new proposed building would be built to meet the Building Energy Efficiency Standards and CALGreen Standards.
EC2 Residential Green Building Ordinance	Update building code to mandate higher building performance in residential buildings. Mandate achievement of CALGreen Tier 1 energy performance. Consider additional mandatory requirements such as solar hot water or cool roofs. Seek to harmonize with regional Green Building Ordinances.	<b>Consistent.</b> The City does not require implementation of the voluntary CALGreen energy standards. However, the project would replace the existing building with a newer, more energy-efficient residential structures. The new proposed building would be built to meet the Building Energy Efficiency Standards and CALGreen Standards.
EW2 Water Conservation Ordinance	Adopt Bay Area Water Supply and Conservation Agency (BAWSCA) Indoor Ordinance and enhance BAWSCA Outdoor Ordinance as part of Green Building Codes update in 2014.	<b>Consistent.</b> The project would comply with the City's Recycled Water Development Standards Guide, which is a requirement for all development projects within the recycle water service area.

Measure	Description	Project Consistency with Applicable Measures
TL1 Smart Growth Development	Continue to implement the policies and programs in City planning documents (e.g., General Plan, Downtown Precise Plan, Zoning Ordinance) to prioritize infill, higher density, transportation-oriented and mixed-use development.	<b>Consistent.</b> The project would be an infill residential project and is consistent with the City's policies to prioritize this type of development. The project site is also in a transit rich area, approximately 0.25 mile from the Redwood City Caltrain station and Redwood City Transit Center, and one block from the nearest SamTrans bus stop. The project will propose supporting the goals of the RWC moves Citywide Transportation Plan and the El Camino Corridor Plan.
TL4 Parking Policies	Establish parking policies to increase use of walking, public transit, and bicycling.	<b>Consistent.</b> The project will propose unbundled parking, and the applicant is requesting a reduced parking ratio. Additionally, the project proposes bicycle infrastructure improvements within the building in the form of secured bicycle facilities.

*Source: Greystar, 2019*

The project would be consistent with these policies, because it would implement the City's Green Building Ordinance and would use several methods outlined above to further minimize energy consumption. Therefore, the project would not conflict with any plans for renewable energy or energy efficiency.

### 3.6.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase energy disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### **Mitigation Measures**

No mitigation is required.

#### **References:**

California Building Standards Commission. California Building Standards Code (California Code of Regulations, Title 24). Available: <http://www.bsc.ca.gov/Codes.aspx>. Accessed August 2019.

City of Redwood City. 2019. Construction & Demolition Debris Program. Available: [http://www.redwoodcity.org/home/showdocument?id=12925\\_](http://www.redwoodcity.org/home/showdocument?id=12925_) Accessed August 2019.

### 3.7 Geology and Soils

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>VII. Geology and Soils. Would the project:</b>					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the time of the DTPP Program EIR, paleontological resources were analyzed under Cultural Resources in criterion c. The threshold was moved to geological resources criterion f per the CEQA Appendix G Environmental Checklist Form update (2019).

#### 3.7.1 Program EIR Findings

The DTPP Program EIR determined that future development in accordance with the DTPP would expose new development and its occupants to seismic hazards. However, although the DTPP area has a moderate to high susceptibility to ground shaking and liquefaction, the City's routine grading and building permit regulations, including the California Building Codes and the City's development review procedures, provide reasonable assurances that individual projects would incorporate the design and engineering

refinements necessary to reduce the impact of DTPP-facilitated development to a less-than-significant level, requiring no additional mitigation.

The DTPP Program EIR also found that proposed development may be subject to hazards from expansive soils, resulting in a potentially significant impact. Implementation of Mitigation Measure 16-1 stipulates that a final geotechnical report as required by the City Building Official shall include an analysis of expansive soil hazards and recommended stabilization measures. Following review and approval by a City-retained registered geologist, recommendations will be incorporated into a report to be included with each building permit application, and with the plans for all public and common area improvements. Implementation of Mitigation Measure 16-1 would reduce the impact to less than significant.

The DTPP Program EIR found that proposed development would be subject to damage due to the presence of corrosive soils within the DTPP area, resulting in a potentially significant impact. Mitigation Measure 16-2 specifies that buried metal infrastructure include casing that conforms to Part VII (G) of the City's water system design criteria, and standard specification details in Section 02661. Additionally, concrete mixes must conform to Caltrans specifications for Protection of Reinforcement Against Corrosion Due to Chlorides, Acids, and Sulfates, as outlined in the Memo to Designers 10-5, January 2002.

The DTPP Program EIR also determined that grading for future development would temporarily disturb the area's existing topography and vegetative cover, leaving soils exposed to wind and water erosion during the construction period. This would result in a potentially significant impact, and Mitigation Measure 16-3 would be required. Mitigation Measure 16-3 requires the applicant to prepare an erosion control plan subject to City approval and consistent with the San Mateo County Stormwater Pollution Prevention Plan BMPs for projects that involve a grading area of 10,000 or more square feet.

The DTPP Program EIR determined that with implementation of the above-mentioned mitigation measures, DTPP implementation would have less-than-significant impacts on earthquake-related hazards, geologic hazards, expansive soils, and soil erosion.

The DTPP Program EIR also found that earthmoving activity associated with DTPP-facilitated development could potentially disrupt, alter, or eliminate as-yet undiscovered paleontological resources, which represented a potentially significant impact. Mitigation Measure 7-5 of the DTPP Program EIR requires that prior to the issuance of grading or demolition permits, the Community Development Department, in coordination with a qualified paleontologist, assess individual development proposals for the potential to destroy unique paleontological resources and to determine provisions to protect such resources when applicable, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery as detailed in Mitigation Measure 7-1. The DTPP Program EIR found that with implementation of Mitigation Measure 7-1, the impacts on paleontological resources would be reduced to a less-than-significant level.

### 3.7.2 Project Analysis

- a) **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
  - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?**

The project site is not located within an Alquist-Priolo Earthquake Fault Zone (DOC, 2019). Because the project site is outside the Alquist-Priolo Earthquake Fault Zone and no known major active faults exist at the project site, there is a low risk of surface rupture related to fault movement. The potential for the project to exacerbate the risk of a rupture of a known fault is non-existent, due to the nature of the development and because no known faults cross the project

site. Therefore, construction or operation of the project would not directly or indirectly cause potential substantial adverse effects due to fault rupture, and the project would have no impact above those identified in the DTPP Program EIR.

**ii) Strong seismic ground shaking?**

Although construction of additional habitable space in an area that could be subject to violent ground shaking could exacerbate the risk of loss, injury, or death if the building were not adequately designed to reduce potential impacts from seismic shaking, the project would be required to follow the seismic standards of the most recent version of the California Building Code. The Code includes measures to ensure that structures can withstand the maximum expected ground shaking without catastrophic failure. Although complete avoidance of any damage may not be feasible, incorporation of industry-standard seismic design measures in accordance with current building codes would mean that potential impacts associated with strong seismic ground shaking would be less than significant.

Development on the site would be subject to review and approval by the City. The project would be designed and constructed in accordance with all applicable seismic standards adopted by the City of Redwood City, including the California Building Code, which requires that a site-specific geotechnical investigation be conducted. Based on the investigation, a site-specific geotechnical report prepared by a licensed professional must recommend, as necessary, measures to reduce potentially significant geologic hazards (e.g., expansive and corrosive soils, differential settlement, and slope instability). The report, including the recommended measures, is subject to City Building Official approval prior to the issuance of grading and building permits. The required contents of the geotechnical report are described in DTPP Program EIR Mitigation Measure 16-1.

With conformance to industry-standard seismic design measures, construction and operational impacts of the project relating to seismic ground shaking would be less than significant, and the project would not have any impacts above those identified in the DTPP Program EIR.

**iii) Seismic-related ground failure?**

The proposed project would be required to follow the seismic standards of the most recent version of the California Building Code, which requires measures to ensure that potential risks from ground settlement and liquefaction are minimized. Although complete avoidance of any damage may not be feasible, incorporation of industry-standard seismic design measures, in accordance with current building codes, would reduce potential impacts from liquefaction and other seismic-related ground failure to less-than-significant levels.

The preliminary geotechnical investigation prepared for the project indicated the risk of surface faulting and secondary ground failure from previously unknown faults is very low (Rockridge Geotechnical, 2018). Additionally, as stated above in criteria a.ii.), a site-specific geotechnical report would be prepared to recommend measures to reduce potentially significant geologic hazards. The required contents of the geotechnical report are described in DTPP Program EIR Mitigation Measure 16-1, which would be incorporated into the project.

With implementation of measures identified in the geotechnical report, and conformance to industry-standard seismic design measures in accordance with current building codes as part of the project, construction and operational impacts of the project relating to seismic ground failure, including liquefaction, would be less than significant, and the project would not have impacts beyond those identified in the DTPP Program EIR.

**iv) Landslides?**

Because the project site and the surrounding area is flat, and because the site is not classified as a landslide area and is not near any known landslides, construction and operation of the project

would have no impact beyond those analyzed in the DTPP Program EIR relating to landslide hazards (DOC, 2019).

**b) Result in substantial soil erosion or the loss of topsoil?**

Construction of the project would involve the demolition of the existing structure to accommodate the proposed development. The site would then be graded and excavated to form building pads, followed by construction activities to build the new development. These site grading and excavation activities have the potential to cause soil erosion. As a condition of project approval, the City would require the project applicant to implement a winterization program to minimize the potential for erosion and sedimentation if construction is not completed by the start of the wet season. In addition, Redwood City's Stormwater Management and Discharge Control Program Ordinance requires BMPs to reduce water quality impacts of stormwater runoff. The project would also incorporate BMPs as outlined in the project's Stormwater Checklist for Small Projects administered by the San Mateo Countywide Water Pollution Prevention Program and require appropriate BMPs as set forth in the San Mateo Countywide Water Pollution Prevention Program. Potential erosion and transportation of soil particles would be managed through standard construction BMPs, such as installation of silt fences, which would substantially reduce potential sediment transport from the construction site. Other BMPs that would be implemented at the site include stabilized construction entrances and storm drain inlet protection. The contractor would also be responsible for maintaining these BMPs in good and effective condition.

With implementation of the above-mentioned measures, the project would not have any impacts above those analyzed in the DTPP Program EIR.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

The preliminary geotechnical investigation identified the project site within a mapped zone of liquefaction potential. The results of the preliminary liquefaction analyses performed as part of the project-specific preliminary geotechnical investigation (Rockridge Geotechnical, 2018) indicate there are several thin, discontinuous layers of potentially liquefiable soil beneath the site. In the event of a major event on a nearby fault, the estimated ground surface settlements associated with liquefaction would vary from 0.25 to 0.75 inch, with differential settlements of up to 0.5 inch over a horizontal distance of 30 feet. Based on the potentially liquefiable soils present at the site, the preliminary geotechnical report recommended a foundation system to reduce liquefaction-induced settlement following a major earthquake.

The preliminary geotechnical investigation also concluded that based on the relatively flat site grades, as well as the depth, relative thickness, and discontinuous nature of the potentially liquefiable layers, the risk of lateral spreading at the site is low (Rockridge Geotechnical, 2018).

Discussion of earthquake-induced landslides and other seismic-related ground failure are discussed previously under criteria (a)(iii) and (iv), above.

The proposed project must be designed in accordance with the most recent version of the California Building Code, which requires site-specific design-level evaluation of underlying materials and their engineering characteristics to minimize the potential total and differential settlement of finished structures, and lateral spread or collapse of excavations during construction. As stated above in criteria ii), a site-specific geotechnical report would be prepared to provide measures to reduce potentially significant geologic hazards. The required contents of the geotechnical report are described in DTPP Program EIR Mitigation Measure 16-1.

With implementation of measures identified in the geotechnical report, and conformance to industry-standard seismic design measures in accordance with current building codes as part of the project,



construction and operational impacts of the project relating to unstable soils would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

The preliminary geotechnical report identified the presence of moderately to highly expansive near-surface clay at the project site. Expansive near-surface soil is subject to volume changes during seasonal fluctuations in moisture content. These volume changes can cause movement and cracking of foundations, slabs, and pavements. The preliminary geotechnical report recommends to moisture-condition the expansive soil below slabs; provide non-expansive soil below slabs; and either supporting foundations below the zone of severe moisture change, or providing a stiff, shallow foundation that can limit deformation of the superstructure as the underlying soil shrinks and swells (Rockridge Geotechnical, 2018).

As stated above in criteria ii), a final geotechnical report would be prepared to identify additional measures to reduce potentially significant expansive soil hazards. The required contents of the geotechnical report are described in DTPP Program EIR Mitigation Measure 16-1.

With implementation of measures identified in the geotechnical report, and conformance to industry-standard seismic design measures in accordance with current building codes as part of the project, construction and operational impacts of the project relating to expansive soils would be less than significant, and the project would not have any impacts beyond those already analyzed in the DTPP Program EIR.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

The proposed project does not include any septic tanks or alternative wastewater disposal; disposal of project wastewater would use City sewer lines. There would be no impact on site soils due to use of a septic system or an alternative wastewater disposal system, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?**

Paleontological resources or site or unique geologic features are not known to exist on the project site. However, it is possible that earth-disturbing project construction activities could inadvertently discover previously unrecorded paleontological resources. Therefore, Mitigation Measure 7-5 would be applicable to the project. As discussed above, Mitigation Measure 7-5 of the DTPP Program EIR requires that prior to the issuance of grading or demolition permits, the Community Development Department, in coordination with a qualified paleontologist, assess individual development proposals for the potential to destroy unique paleontological resources, and to determine provisions to protect such resources when applicable, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery as detailed in Mitigation Measure 7-1. Mitigation Measure 7-5 would reduce potential impacts of the project on paleontological resources to a less-than-significant level, and the project would not have any impacts above those identified in the DTPP Program EIR.

### 3.7.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts related to geology, soils, and seismicity disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP

Program EIR. The project would implement Mitigation Measure 16-1 and Mitigation Measure 7-5 as outlined in the DTPP Program EIR.

### ***Mitigation Measures***

- **Mitigation Measure 16-1.** The detailed, design-level geotechnical investigations required by the City Building Official shall include analysis of expansive soil hazards and recommend stabilization measures. Once grading plans have been developed, the actual use of expansive soils in engineered fill construction shall be further evaluated, and the location of primary borrow source areas for fills shall be determined. Additionally, supplemental field and laboratory testing of potential cut materials shall be completed. In addition to observing all cut-and-fill slope construction, the project geotechnical engineer shall inspect and certify that any expansive soils underlying individual building pads and all roadway subgrades have been either removed or amended in accordance with City-approved construction specifications. If expansive soils are not fully remediated on each lot and in the area of all public and private improvements at the time of site development, the project geotechnical engineer shall make site-specific recommendations for grading, drainage installation, foundation design, the addition of soil amendments, and/or the use of imported, non-expansive fill materials, as may be required to fully mitigate the effects of weak or expansive soils, and prevent future damage to project improvements. These recommendations shall be reviewed by a City-retained registered geologist; and following his or her approval, be incorporated into a report to be included with each building permit application, and with the plans for all public and common area improvements. In addition, because proper drainage, in particular, can improve the performance of expansive soils by significantly reducing their tendency to shrink and swell, deed restrictions shall be imposed to prohibit significant modification of finished lot grades that would adversely affect site drainage. Implementation of these measures to the satisfaction of the City, combined with conformance with standard California Building Code, State of California, City of Redwood City, and other applicable regulations, would reduce the potential effect of expansive soils to a less-than-significant level.
- **Mitigation Measure 7-5.** Prior to the issuance of grading or demolition permits, the City Planning, Housing, and Economic Development Department, in coordination with a qualified paleontologist, shall assess individual development project proposals within the DTPP area for the potential to destroy unique paleontological resources. The City Planning, Housing and Economic Development Department shall require development proposals entailing significant earthworks or deep foundations with the potential to penetrate sedimentary rock layers to incorporate a study by a professional paleontologist to assess the potential for damage of paleontological resources. Should the paleontologist determine that the proposal has the potential to damage paleontological resources, the paleontologist shall provide detailed provisions for the protection of these resources to the City Planning, Housing, and Economic Development Department. These provisions may include the complete avoidance of the resource, in-place preservation, and/or complete data recovery as discussed in Mitigation Measure 7.1 (b). Implementation of this measure would reduce the potential impact on paleontological resources to a less-than-significant level.

### **References:**

Department of Conservation (DOC). 2019. Earthquake Zones of Required Investigation. Available: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed August 7, 2019.

Rockridge Geotechnical. 2018. Preliminary Geotechnical Investigation to Support Due Diligence Evaluation 1304 El Camino Real Redwood City, California.

## 3.8 Greenhouse Gas Emissions

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>VIII. Greenhouse Gas Emissions. Would the project:</b>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The DTPP Program EIR analyzed impacts to greenhouse gas emissions in Section 13, Climate Change, in the DTPP Program EIR. The analysis is separated out here per the updated thresholds in Appendix G of the CEQA Guidelines (2019).

### 3.8.1 Program EIR Findings

The DTPP Program EIR determined that although the occupancy and operation of DTPP-facilitated projects would generate greenhouse gas (GHG) emissions, these emissions would be below the BAAQMD GHG emissions significance threshold, resulting in a less-than-significant impact.

The DTPP Program EIR also found that the DTPP area could be subject to flooding due to sea level rise associated with global climate change, placing people, structures, and other improvements at an increased risk of injury or loss from flooding resulting in a potentially significant impact. Therefore, it required implementation of Mitigation Measure 13-1. Mitigation Measure 13-1 required that the City prepare strategies to respond to the impact of flooding, but acknowledged that given the unprecedented nature and uncertainty regarding this emerging issue, it could not be concluded that Mitigation Measure 13-1 would reduce this potential impact to a less-than-significant level. The DTPP Program EIR concluded that even with implementation of Mitigation Measure 13-1, the impact relating to sea level rise would remain significant and unavoidable.

### 3.8.2 Project Analysis

#### a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Similar to air quality, the BAAQMD CEQA Air Quality Guidelines identify screening criteria to provide lead agencies with a conservative indication of whether a project would exceed the BAAQMD GHG threshold of 1,100 million tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) per year, which was developed consistent with AB 32 statewide targets. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. Table 3.8-1 shows the BAAQMD's operational screening criteria for single-family homes.

**Table 3.8-1 Operational Screening Level Sizes**

Land Use Type	Operational GHG Screening Size
Single-family	56 dwelling units

Source: BAAQMD 2017

Because the project would provide 39 housing units, it would meet the screening criteria identified for operations, and would not be expected to contribute substantially to GHG emissions. Although the BAAQMD has not adopted a threshold of significance consistent with Senate Bill (SB) 32 goals (which established a 2030 GHG emissions reduction target of 40 percent below 1990 levels), because the 1,100 MT CO<sub>2</sub>e emissions rate is equivalent to a project size of approximately 60 single-family dwelling units, the project emissions from 39 dwelling units can be presumed also to not result in a cumulatively considerable increase in GHG emissions in the SB 32 context (2030 time frame). Therefore, the project would not have the potential to generate GHG emissions that could have a significant impact on the environment. Therefore, the impact would be less than significant, and there would be no impact above what was analyzed in the DTPP Program EIR.

The project would construct approximately 1.5 percent of the total residential development anticipated in the DTPP Program EIR. As stated above, the DTPP Program EIR concluded that the total development under the DTPP would have a less-than-significant impact on GHG emissions. Due to the small percentage of development represented by the project, the resulting GHG emissions would not have an impact above what was analyzed in the DTPP Program EIR.

**b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500, et seq.). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions, and establishes a cap on statewide GHG emissions; it requires that statewide GHG emissions be reduced to 1990 levels by 2020.

In December 2008, ARB adopted its Climate Change Scoping Plan (Scoping Plan), which contains the main strategies that California will implement to achieve the GHG reductions required by AB 32 (ARB, 2008). In 2014, ARB approved the first update to the Climate Change Scoping Plan: Building on the Framework (ARB, 2014). In 2016, the State Legislature passed SB 32, which established a 2030 GHG emissions reduction target of 40 percent below 1990 levels. In response to SB 32 and the companion legislation of AB 197, ARB released a proposed scoping plan on January 21, 2017. The final scoping plan was adopted in November 2017 to provide a framework for achieving California's 2030 GHG target (ARB, 2017).

The City's 2013 CAP was developed to reduce GHG emissions by implementing various strategies and programs at the local level. The CAP identifies the City's existing GHG inventory, and estimates emissions for the year 2020 under different scenarios. Based on this analysis, the City recommended emission reduction targets to help meet AB 32's regional goals. The CAP recommends various renewable energy, energy-efficiency, and energy conservation strategies over the 15-year period from 2005 to 2020, including policies that are applicable to the project. The project would be consistent with the City's CAP, because it would achieve CALGreen Tier 1 energy performance, and would implement several other energy efficiency measures, as outlined in Section 3.6, Energy, above.

Furthermore, in an effort to meet the goals of AB 32 to reduce statewide GHG emissions, the California Building Code established CALGreen. CALGreen encourages sustainable construction practices and building design in the categories of residential planning and design, including energy efficiency and water efficiency. The project would comply with the most recent 2019 CALGreen

requirements, which become effective January 1, 2020. The 2019 CALGreen requirements include mandatory measures for all new building construction, to achieve energy conservation and make a major contribution in meeting the State's goals, established by AB 32 and SB 32, for reduction in GHG emissions (CEC, 2018).

Based on the project's required compliance with the City's Green Building Ordinance and 2019 CALGreen requirements, the project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the impact would be less than significant, and there would be no impacts above what was determined in the DTPP Program EIR.

### 3.8.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts GHG impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

#### **References:**

California Air Resources Board (ARB). 2014. Assembly Bill 32 Overview. Available: <https://www.arb.ca.gov/cc/ab32/ab32.htm>. Accessed April 2019.

Bay Area Air Quality Management District (BAAQMD). 2017 California Environmental Quality Act Air Quality Guidelines. Available: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed April 2019.

Intergovernmental Panel on Climate Change (IPCC). 2013. Climate Change 2013: The Physical Science Basis. Available: <http://www.ipcc.ch/report/ar5/wg1/>. Accessed April 2019.

### 3.9 Hazards and Hazardous Materials

ENVIRONMENTAL ISSUES		Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>IX. Hazards and Hazardous Materials. Would the project:</b>						
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Be 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 it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

At the time of the DTPP Program EIR, Hazards and Hazardous Materials included a significance threshold criterion f for projects within the vicinity of a private airstrip. This significance criterion was deleted per the CEQA Appendix G Environmental Checklist Form update (2019). The updated CEQA checklist added criterion f above related to emergency response.

#### 3.9.1 Program EIR Findings

The DTPP Program EIR found that although some hazardous substances may be generated, stored, transported, used, or disposed of in association with residential and non-residential development projects Downtown, existing local, State, and Federal regulations and oversight would reduce the potential threat to less than significant.

The DTPP Program EIR found that because no manufacturing or industrial processes that use or produce dangerous substances are allowed under the DTPP, and with mandatory local, county, regional, State,

and Federal regulations in place to minimize harm from the use, storage, transport, and disposal of hazardous materials, the risk to the public or the environment from upset and accident conditions would represent a less-than-significant impact.

The DTPP Program EIR found that with existing General Plan policies and Federal, State, and local regulation and oversight of hazardous materials, the potential threat to schools within 0.25 mile of the DTPP area from hazardous materials transport, use, or disposal, or from the risk of upset and accident conditions involving the release of hazardous materials, would represent a less-than-significant impact.

The DTPP Program EIR also found that DTPP implementation impacts resulting from exposure to existing hazardous materials contamination, asbestos and polychlorinated biphenyls, and lead-based paint would be less than significant.

The DTPP Program EIR also found that impacts of the DTPP on the San Carlos Airport Land Use Plan would be less than significant. The Airport Land Use Commission (ALUC) reviewed the DTPP prior to its adoption, and found that its goals, objectives, policies, and development criteria were consistent with the San Carlos Airport Land Use Plan.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts related to hazards and hazardous materials, and no mitigation measures would be required.

### 3.9.2 Project Analysis

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

The following discussion addresses items a) and b).

Project construction would involve the storage, use, and transport of small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, paint, and other substances) on roadways. Regulations governing hazardous materials transport are included in California Code of Regulations (CCR) Title 22 (Health and Safety Codes) and CCR Title 13 (Motor Vehicle Code). The transportation of hazardous materials is also subject to applicable local, State, and Federal regulations, which have been specifically designed to minimize the risk of upset during routine construction activities. State agencies with primary responsibility for enforcing Federal and State regulations and responding to hazardous materials transportation emergencies include the California Highway Patrol and the Caltrans. Use of hazardous materials is regulated by the California Department of Toxic Substances Control (DTSC), as outlined in Title 22 of the CCR. The project applicant, builders, contractors, and future residents would be required to use, store, and transport hazardous materials in compliance with applicable Federal, State, and local regulations during project construction and operation. Such compliance would reduce the potential for accidental release of hazardous materials during construction of the proposed project.

Project construction activities may include refueling and minor maintenance of construction equipment on site, which could lead to minor fuel and oil spills. The use and handling of hazardous materials during construction would occur in compliance with applicable Federal, State, and local laws, including California Division of Occupational Safety and Health requirements.

Construction and operation of the proposed project are required by law to implement and comply with existing hazardous material regulations. Each of these regulations is specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated, quicker response to emergencies. Additionally, no industrial or heavy commercial equipment are permitted



under the DTPP. The DTPP Program EIR concluded that with mandatory local, county, regional, State, and Federal regulations in place, the risk to the public or the environment from upset and accident conditions would be a less-than-significant impact.

With adherence to applicable Federal, State and local regulations, impacts related to the creation of significant hazards to the public through routine, transport, use, disposal, and risk of upset is considered less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

No existing or proposed K-12 schools are within 0.25 mile of the project site. There would be no impact, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**d) Be 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 it create a significant hazard to the public or the environment?**

The project site is not included on the list of hazardous waste sites (Cortese List), compiled by DTSC pursuant to Government Code Section 65962.5 (CalEPA, 2019, 2019b; DTSC, 2019; SWRCB, 2019). Therefore, the project would not create a significant hazard to the public or environment. There would be no impact, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

The project site is located within San Carlos Airport Influence Area A. The ALUC reviewed the DTPP prior to its adoption and found that its goals, objectives, policies, and development criteria were consistent with the San Carlos Airport Land Use Plan. Although the proposed project is 21 feet taller than existing DTPP height zone for the project site, the DTPP includes taller height zones nearby that were found not to conflict with the San Carlos Airport Land Use Plan. Additionally, there are no other public airports, public use airports, or private airstrips within 2 miles of the project site. Therefore, implementation of the proposed project would not result in a safety hazard for people residing or working in the project vicinity. There would be no impacts above those analyzed in the DTPP Program EIR.

**f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No public roads would be closed during project construction. Construction activities would not fundamentally alter emergency response and evacuation routes in the vicinity of the project site, which would remain unchanged from existing conditions. Additionally, the proposed project design would be reviewed by the Redwood City Fire and Police departments prior to approval to ensure that the project has adequate ingress and egress; incorporates additional design features (setbacks, clearances, etc.); and does not impede emergency access. Therefore, the impact would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**g) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

The project site is not in a State Responsibility Area or a Very High Fire Hazard Severity Zone, and is more than 1.5 miles from the nearest such area or zone (CAL FIRE, 2007; 2008). The project site is

in a highly urbanized area with relatively flat topography and good accessibility for emergency response. Therefore, the project would not expose people or structures to a substantial risk of loss, injury, or death involving wildland fires. There would be no impacts above those analyzed in the DTPP Program EIR.

### 3.9.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts related to hazards and hazardous materials disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

#### **References:**

California Environmental Protection Agency (Cal-EPA). 2019a. Cortese List Data Resources. Available: Accessed August 6, 2019.

\_\_\_\_\_. 2019b. Solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit. Available: <http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>. Accessed August 6, 2019.

\_\_\_\_\_. 2019c. List of "Active" Cease and Desist Orders and Cleanup and Abatement Orders. Available: <http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx>. Accessed August 6, 2019.

\_\_\_\_\_. 2019d. Information Required From the Department of Toxic Substances Control Under Government Code Section 65962.5(a). Available: <https://www.calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/>. Accessed August 6, 2019.

CAL FIRE, 2007. Fire Hazard Severity Zones in State Responsibility Areas adopted by CAL FIRE, San Mateo County. Available: [http://frap.fire.ca.gov/webdata/maps/san\\_mateo/fhszs\\_map.41.pdf](http://frap.fire.ca.gov/webdata/maps/san_mateo/fhszs_map.41.pdf). Accessed August 6, 2019.

\_\_\_\_\_, 2008. Very High Fire Hazard Severity Zones in Local Responsibility Areas as recommended by CAL FIRE, San Mateo County. Available: [http://frap.fire.ca.gov/webdata/maps/san\\_mateo/fhszl\\_map.41.pdf](http://frap.fire.ca.gov/webdata/maps/san_mateo/fhszl_map.41.pdf). Accessed August 6, 2019.

Department of Toxic Substances Control (DTSC). 2019a. List of Hazardous Waste and Substances Sites from DTSC's Envirostor Database. Available: [https://www.dtsc.ca.gov/SiteCleanup/Cortese\\_List.cfm](https://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm). Accessed August 6, 2019.

State Water Resources Control Board (SWRCB). 2019a. Geotracker online database. Search Results for Leaking Underground Storage Tank Sites within Redwood City. Available: [https://geotracker.waterboards.ca.gov/search?CMD=search&case\\_number=&business\\_name=&main\\_street\\_name=&city=Redwood+City&zip=&county=&SITE\\_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER\\_BASE=&Search=Search](https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=Redwood+City&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search). Accessed August 6, 2019.

### 3.10 Hydrology and Water Quality

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>X. Hydrology and Water Quality. Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The DTPP Program EIR analyzed impacts to hydrology and water quality in Utilities and Infrastructure. The analysis is separated out here per the updated thresholds in CEQA Guidelines Appendix G (2019).

At the time of the DTPP Program EIR, the Appendix G Environmental Checklist Form significance threshold criterion c was broken down into criteria d and e, and criteria f was combined with criteria a. The 2012 criteria g, h, i, and j are now combined into criterion d.

The updated Appendix G Environmental Checklist Form (2019) also added a new significance threshold, included in criterion e, for consistency with water quality control or sustainable groundwater plans. Information on water regulatory plans was known when the DTPP Program EIR was certified, and

therefore is not considered new information as specifically defined under CEQA. However, this issue is addressed in the project analysis under criterion “e)” below.

### 3.10.1 Program EIR Findings

The DTPP Program EIR found that DTPP implementation would not result in a substantial increase in impervious surface area. Therefore, DTPP implementation would not increase stormwater runoff, and would not substantially interfere with groundwater recharge, resulting in a less-than-significant impact to storm drainage systems.

The DTPP Program EIR found that stormwater runoff from the DTPP area, if not properly controlled before discharge, could substantially degrade water quality during and post-construction. However, with required implementation of the standard City, County, and RWQCB requirements, this impact would be less than significant.

The DTPP program EIR also found that DTPP implementation would not result in a substantial increase in impervious surface area. Therefore, the DTPP would not substantially interfere with groundwater recharge and impacts would be less than significant.

The DTPP Program EIR also found that because all new developments within designated flood hazard zones would be required to meet specific flood damage avoidance requirements, impacts would be less than significant. Redwood City also participates in the California Office of Emergency Services (CA OES) dam failure inundation mapping and emergency procedure program; therefore, flooding impacts related to dam failure would also be less than significant.

The DTPP Program EIR also found that the DTPP area is not located close enough to San Francisco Bay to be affected by a seiche; is not subject to tsunami inundation and is far from hillsides; and is not subject to risk from debris flow source areas as mapped by the Association of Bay Area Governments. Impacts associated with these hazards would be less than significant.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts relating to hydrology and water quality, and no mitigation measures are required.

### 3.10.2 Project Analysis

#### a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

**Construction:** Construction activities, such as grading, excavation, and backfilling, have the potential to affect surface water quality. Disturbed soils temporarily exposed to the erosive forces of wind, rain, and stormwater runoff could be released to nearby drainages and storm drains. In addition, stormwater runoff could be contaminated with chemicals used during construction (such as fuels, oils, and solvents) as the result of the daily use, transportation, and storage of these materials; or from contaminants remobilized from areas of existing soil contamination at the project site. Disposal of construction dewatering could also degrade surface water quality if dewatering of groundwater during excavations is not appropriately treated and/or disposed of. Construction activities also have the potential to impact groundwater quality if groundwater is directly exposed to construction contaminants, such as may occur after hazardous material spills.

The project is classified as a “small project” by the San Mateo Countywide Water Pollution Prevention Program because it would create or replace less than 10,000 square feet of impervious surface area. Small projects that create or replace more than 2,500 square feet of impervious area are required by the Prevention Program to provide one of six permanent stormwater control measures listed on the County’s Provision C.3.i Small Projects website. This stormwater control measure is subject to City review and approval.

Per the City's Conditions of Approval, the City would also require the project applicant to implement a winterization program to minimize the potential for erosion and sedimentation if construction is not completed by the start of the wet season. In addition, Redwood City's Stormwater Management and Discharge Control Program Ordinance requires BMPs to reduce water quality impacts of stormwater runoff.

With implementation of existing City and County regulations, the project would prevent adverse impacts to water quality. Therefore, the impact to water quality or waste discharge requirements from project construction would be less than significant, as was previously disclosed in the DTPP Program EIR. The project would not have any impacts beyond those analyzed in the DTPP Program EIR.

**Operation:** Per the City's Conditions of Approval, post-construction runoff into the storm drain shall not exceed pre-construction runoff levels. As part of the project review process, the applicant must provide drainage calculations that satisfy this criterion, and must be approved by the City Engineer.

In summary, because the project sponsor would implement post-construction stormwater management in accordance with the aforementioned regulations, operation of the proposed project would not violate any water quality standards or waste discharge requirements, and would not substantially degrade water quality. Operational impacts would therefore be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Construction:** Water demands during construction (for dust control, concrete mixing, etc.) would be met by existing service connections to municipal suppliers. Thus, construction demand for water would not affect the storage capacity of the groundwater basin, which extends over 75 square miles (DWR, 2014). Construction activities would not require new wells or substantial increases in pumping at regional municipal wells, nor would it interfere with groundwater recharge that could occur if the project were converting pervious surfaces to impervious surfaces. Because construction of the project would not substantially increase groundwater pumping or cause substantial changes in groundwater elevations, construction-related impacts to groundwater supply and groundwater management would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR. See criteria e) for additional discussion.

**Operation:** No groundwater extraction is directly proposed as part of ongoing project operations; and as discussed further in Section 3.18, Utilities and Service Systems, adequate water supply is available to serve the proposed residential units in the project site. The project site is not a major groundwater recharge area. Following completion of construction, the project site would have slightly more pervious surfaces, compared to existing conditions, because the proposed building would cover the whole project site, and include a landscaped rooftop deck. In compliance with the County's Provision C.3.i Small Projects requirements, the proposed project would include draining the impervious roof to the landscaped area on the podium deck. The project would also include Low Impact Development (LID) treatment measures such as detention vaults that would capture runoff from the impervious portion of the roof. The detention vault is built to collect approximately 10 cubic feet of water (75 gallons). Because the existing site does not contribute substantially to groundwater recharge, and because of the limited proposed changes to pervious surfaces, the project would not interfere with groundwater recharge. As a result, potential operational impacts of the project on groundwater supplies and groundwater management would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR. See criteria e) for additional discussion.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in**

**a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?**

**Construction:** There are no streams or rivers on the project site, and the project site is not within a 100-year flood hazard zone; therefore, construction of the proposed project would not alter the course of a stream or river, and would not impede or redirect flood flows. Project construction would involve the demolition of existing structures, grading, and excavation activities, which would temporarily alter existing drainage patterns, and would likely involve additional onsite infiltration and/or detention vaults. Similar to existing conditions, project site runoff during construction would generally drain by surface flow to street gutters and into the public storm drain system. Stormwater runoff would likely be managed through temporary drainage controls such as sandbag barriers or gravel bag berms to redirect run-on away from the project site, as outlined in the Stormwater Checklist for Small Projects. Water used during construction, such as for dust control, would not be applied in amounts that would generate runoff from the construction site; and water applications would be suspended during storm events.

The project would incorporate standard construction BMPs from the San Mateo County Pollution Prevention Program and BMPs from Redwood City's Stormwater Management and Discharge Control Program to minimize runoff. The project would also implement one of six permanent stormwater control measures listed on the County's Provision C.3.i Small Projects website to manage runoff.

With implementation of BMPs and compliance with the County's Provision C.3.i for small projects, construction of the proposed project would not involve alterations to the existing drainage pattern that would result in substantial erosion or siltation on- or off-site, or that would provide substantial additional sources of polluted runoff. Construction-related impacts to alteration of drainage patterns would therefore be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**Operation:** There are no streams or rivers on the project site, and the project site is not within a 100-year flood hazard zone; therefore, operation of the proposed project would not alter the course of a stream or river, and would not impede or redirect flood flows.

Following completion of construction activities, the project site would be entirely developed with residential development that would significantly alter drainage patterns compared to existing conditions, because the existing use occupies almost the entire lot. Additionally, landscaped areas would be composed of LID flow-through treatment planters; and the proposed permanent changes to drainage patterns at the site would not cause substantial erosion on the project site.

As stated above, the project would also implement one of six permanent stormwater control measures listed on the County's Provision C.3.i Small Projects website<sup>6</sup>. In compliance with the County's Provision C.3.i Small Projects requirements, the proposed project would include draining the impervious roof to the landscaped area on the podium deck. The project would also incorporate BMPs as outlined in the Stormwater Checklist for Small Projects, including protecting storm drain inlets using sediment controls. Additionally, the project would comply with City Conditions of Approval 44, as they relate to preparation of a Stormwater Management Plan. Therefore, post-development runoff from the project site would not cause increased erosion in downstream areas compared to existing conditions, and operation of the project is therefore not anticipated to substantially increase the rate or amount of surface runoff in a manner that would result in flooding.

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<sup>6</sup> <https://planning.smcgov.org/provision-c3i-small-projects>



In summary, with implementation of post-construction stormwater management in accordance with the aforementioned regulations, impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

The project site is not within a 100-year flood zone. The project site is identified as having a 0.2 percent annual chance of flood hazard (i.e., in the 500-year flood zone) (FEMA, 2019). Similarly, the project site is not in a tsunami hazard zone (CDC, 2015), and there are no other large enclosed bodies of water near the project site that would represent a seiche hazard.

Although portions of the project site are in the predicted inundation area for failure of the Lower Emerald Lake dam (Redwood City, 2010a), the project site is at the very downstream edge of the inundation area; therefore, water levels associated with potential dam failure are anticipated to be low (County, 2005). As discussed above, the City also participates in the CA OES dam failure inundation mapping and emergency procedure program; therefore, flooding impacts related to dam failure would also be less than significant.

**Construction:** As discussed above, BMPs and compliance with applicable City and County regulations would prevent release of pollutants to stormwater, and would also prevent release of pollutants to flood waters in the unlikely event of inundation. Construction-related impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**Operation:** Operation of the project would include residential uses typical of similar developments within the City. There are no proposed operational uses at the project site that would represent a greater risk of release of pollutants in the event of inundation by flood or dam waters. Operational impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

With incorporation of C.3.i requirements and City and County regulations, the project would minimize impacts to water quality during construction and operation of the project. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan.

No sustainable groundwater management plan (SGMP) is currently in effect for the San Mateo Plain groundwater basin. A groundwater basin assessment was completed in July 2018 that provided an initial evaluation of basin management options, but does not constitute an SGMP (San Mateo County, 2018). Because there is no SGMP in effect, the project would not conflict with or obstruct such a plan, and there would be no impact. The project would not have any impacts above those analyzed in the DTPP Program EIR.

### 3.10.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase hydrology and water quality impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

**References**

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- San Mateo County. 2018. San Mateo Plain Groundwater Basin Assessment. July.
- San Mateo Countywide Water Pollution Prevention Program. 2016. C.3 Stormwater Technical Guidance, Version 5.0. June.

### 3.11 Land Use and Planning

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XI. Land Use and Planning. Would the project:</b>					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

At the time of the DTPP Program EIR, the Appendix G Environmental Checklist Form also included a significance threshold relating to conflicts with habitat conservation or natural community conservation plans. The updated Appendix G Environmental Checklist Form (2019) deleted this criterion under this topic due to its redundancy with criteria under biological resources.

#### 3.11.1 Program EIR Findings

The DTPP Program EIR determined that DTPP implementation would result in beneficial land use effects from the land use provisions and development standards, including reinforcement of community-wide land use patterns. The DTPP Program EIR concluded that DTPP implementation would not disrupt physical arrangement of a community.

The DTPP Program EIR also found that DTPP implementation would preserve and enhance compatibility with land uses surrounding the DTPP area, resulting in a less-than-significant impact. In addition, the DTPP Program EIR would not substantially conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts, and no mitigation measures are required.

#### 3.11.2 Project Analysis

##### a) Physically divide an established community?

The proposed project would not introduce physical features that would create a barrier, divide, or separate adjacent uses; or impede movement or circulation through the neighborhood. The project site is also surrounded by existing development, and would be consistent with the existing land uses in the vicinity. There would be no impacts above those analyzed in the DTPP Program EIR.

##### b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is designated as Mixed Use – Downtown, per the Redwood City General Plan and the DTPP land use designation (Redwood City, 2010). The project would include development of a six-story residential building, and would be consistent with both the Redwood City General Plan land use designation and the DTPP land use designation. As stated above in Section 3.1, Aesthetics, the project applicant would provide affordable housing, thereby qualifying the project for certain requests

pursuant to the SDBL (Government [Govt.] Code Sections 65915 et. seq.). The provision of low-income households entitles the project to a bonus of a 35 percent increase in residential units and waivers and concessions (Govt. Code, Section 65915(f)). With these provisions, the project would be generally consistent with the DTPP design requirements and standards applicable to project site as outlined in Section 2, Project Description. As discussed throughout this Consistency Analysis, the project would be consistent with the applicable land use plans and development policies for the site that were adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the impact would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

### 3.11.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase land use and planning impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

#### **References:**

City of Redwood City. 2010. Redwood City General Plan. Available: <https://www.redwoodcity.org/departments//community-development-department/planninghousing/planning-services/general-plan-precise-plans/general-plan>. Accessed August 2019.

### 3.12 Mineral Resources

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XII. Mineral Resources. Would the project:</b>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.12.1 Program EIR Findings

The DTPP Program EIR did not identify any areas of significant mineral resources within the DTPP implementation area. The DTPP Program EIR concluded that DTPP implementation would not result in any impacts to mineral resources.

#### 3.12.2 Project Analysis

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

The following discussion addresses items a) and b).

The project site is not in an area known to contain significant mineral resources (USGS, n.d.), nor is it recognized by the General Plan or the DTPP as possessing important mineral resources. Therefore, the project would not result in the loss of availability of a known mineral resource of value to the region or state, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. There would be no impact, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

#### 3.12.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on mineral resources disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### **Mitigation Measures**

No mitigation is required.

**References:**

United States Geological Survey (USGS). n.d. Mineral Resources On-Line Spatial Data. Available: <https://mrdata.usgs.gov/general/map-us.html#home>. Accessed August 2019.



### 3.13 Noise

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XIII. Noise. Would the project result in:</b>					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The updated Appendix G Environmental Checklist Form (2019) deleted criteria c and d which asked whether the project would permanently or temporarily increase the ambient noise levels above levels existing without the project. Criterion f was also combined with new criterion c in the updated Appendix G Environmental Checklist Form (2019).

#### 3.13.1 Program EIR Findings

The DTPP Program EIR concluded that new DTPP-facilitated multi-family residential development could be exposed to noise levels exceeding City guidelines and State Title 24 standards, resulting in a potentially significant impact. The DTPP Program EIR included Mitigation Measure 11-1, which requires completion of a noise study consistent with the requirements of the California Building Code for new multi-family residential projects, and incorporation of noise reduction measures necessary to achieve compatibility with the City's Noise Element guidelines (55 A-weighted decibels [dBA] Community Noise Level Equivalent [CNEL] at sensitive exterior spaces) and Title 24 standards (45 dBA CNEL within residential units). Mitigation Measure 11-1 would reduce impacts to less than significant.

The DTPP Program EIR found that where new residential or other vibration-sensitive uses are proposed within 100 feet or less of the nearest passenger rail lines, permanent vibration impacts would be potentially significant. To address this vibration impact, Mitigation Measure 11-2 requires that prior to the development of new habitable buildings within 100 feet of the Caltrain or California High Speed Rail right-of-way, a detailed site-specific vibration study shall be completed.

The DTPP Program EIR also found that demolition and construction activities could generate substantial temporary ground-borne vibration exceeding standard vibration thresholds, which could interfere with normal activities or cause a nuisance for, or damage to, adjacent properties, resulting in a potentially significant impact. To address this impact, Mitigation Measure 11-3 requires incorporation of conditions of approval for time restrictions on vibration-generating activities, neighborhood notification, pre-construction surveys, and construction monitoring. Mitigation Measure 11-3 would reduce impacts to less than significant.

The DTPP Program EIR also found that demolition and construction activities within the DTPP area could temporarily increase noise levels at nearby residential and commercial receptors, resulting in a potentially significant impact. The DTPP Program EIR included Mitigation Measure 11-4, which requires incorporation of conditions of approval for construction monitoring, and other planning and engineering measures to abate construction-period noise impacts. Mitigation Measure 11-4 would reduce impacts to less than significant.

The DTPP Program EIR also determined DTPP development would increase permanent noise levels, primarily due to new traffic patterns, new commercial development next to or below residential development, and site-specific stationary sources such as mechanical equipment. Traffic noise increases resulting from DTPP development are projected to be from less than 1 decibel (dB) up to 2 dB. Therefore, permanent increases in noise levels resulting from DTPP development would be considered less than significant.

The DTPP Program EIR also found that although the DTPP area is within 2 miles of San Carlos Airport, it is outside the projected 55-dB CNEL contour shown in the Redwood City General Plan and the San Mateo County Comprehensive Airport Land Use Plan. Therefore, potential noise impacts from proximity to an airport are considered less than significant.

The DTPP Program EIR determined that with implementation of the above-mentioned mitigation measures, DTPP implementation would have less-than-significant temporary and permanent noise impacts.

### 3.13.2 Project Analysis

a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Construction:** The unmitigated noise level produced by the combinations of construction equipment for the proposed project would be approximately 85 dBA at 50 feet. The nearest noise-sensitive uses are within 50 feet of the project site. Therefore, the project construction noise levels would be 85 dBA equivalent sound level (Leq) at the nearest noise-sensitive uses, as shown in Table 3.13-1. This level of construction noise would not exceed the threshold of 110 dBA from Municipal Code 24.31, which prohibits noise levels from exceeding 110 dBA for any item of machinery equipment. Also, construction noise would be short-term and temporary, and operation of heavy-duty construction equipment would be intermittent throughout the day during construction.

AECOM conducted 24-hour noise measurements between June 11 and 12, 2019, at the eastern, northern, and western sides of the existing building at the project site (see Attachment NOI). AECOM also conducted a short-term hourly measurement at the southern side of the project site. Measured noise levels at four corners of the project site range from 63 dBA to 72 dBA.

**Table 3.13-1 Construction Equipment Noise Levels (dB,  $L_{eq}$ ) at the Nearest Noise-Sensitive Uses in the Project Area**

Receiver Location	Shortest Distance (feet) Between Noise-Sensitive Uses and Proposed Construction Areas	Noise Level, dB $L_{eq}$			
		Exterior		Interior	
		Ambient Noise	Project Construction Noise	Project Noise, Doors/Windows Open <sup>1</sup>	Project Noise, Doors/Windows Closed <sup>2</sup>
Office, south of project site (along El Camino Real)	100	72	79	64	54
Commercial Area along El Camino Real, west of the project site	80	72	81	66	56
Residential Area, west of project site (along Jackson Avenue)	70	71	82	67	57
Residential Apartment southwest of the project site (along Jackson Avenue)	65	63	83	68	58

Notes: dB = decibels;  $L_{eq}$  = equivalent sound level (the sound energy averaged over a continuous 15-minute to 1-hour period).

<sup>1</sup> 15 dB reduction for doors/windows open (EPA, 1974)

<sup>2</sup> 25 dB reduction for doors/windows closed (EPA, 1974)

Source: Data compiled by AECOM in 2019

Section 24.32 of the City's Code of Ordinance prohibits construction activities in a residential district or within 500 feet of a residential district between 8:00 p.m. and 7:00 a.m. Monday through Friday; and at any time on Saturdays, Sundays, and Holidays, if the noise level generated exceeds the local ambient measured within the residential district. The project would comply with the City's construction noise ordinance and no additional impact would take place above those outlined in the DTPP Program EIR.

Proposed project construction would result in additional vehicle trips on the local roadway network as workers (up to 10 per day) commute and equipment and materials are transported (up to 5 trucks per day). Project-related construction traffic noise levels were estimated using the Federal Highway Administration's Roadway Noise Model. Noise-sensitive land uses, including residential properties, are located within 50 feet from the centerline of the routes anticipated for hauling materials to and from the project site. The unmitigated noise level produced by the construction traffic under the peak construction period for the proposed project is estimated to be approximately 56 dBA at the nearest noise-sensitive uses.

Within and surrounding the project site, the existing traffic noise levels reach up to 75 dB, depending on the distance from El Camino Real and other roadways (Redwood City, 2010). Therefore, the project construction traffic noise would not exceed the existing traffic noise in the area. Also, project construction traffic noise would not exceed the City's acceptable threshold of 60 dBA. As discussed above, the noise environment in the project area currently exceeds the City's noise level goal for exterior noise in residential areas (65 dBA CNEL) as a result of existing vehicular traffic noise sources. The project would have a less-than-significant impact due to construction traffic and would not have any impacts above those identified in the DTPP Program EIR.

**Operation.** The proposed project would also generate permanent operational noise from HVAC and other maintenance activities on the project site, as well as traffic noise from future project site users.

The project is in an area where HVAC systems are in use. Therefore, operational noise associated with HVAC systems would be similar to the surrounding ambient noise levels. Additionally, all systems would be shielded in accordance with City regulations regarding the placement of HVAC systems, as outlined in Article 55, Section 55.5 F (2).

The project would generate traffic noise from future residents. The proposed project would cause the traffic volumes to increase by 12 vehicles during the AM peak hour and 9 vehicles during the PM peak hours (Fehr & Peers, 2019). In comparison, the existing peak hour volumes along El Camino Real at the nearby intersection of Jefferson Street are over 2,000 vehicles (Fehr & Peers 2019).

Typically, when the traffic volume doubles on a roadway segment compared to existing conditions, the resultant increase in traffic noise is approximately 3 dB (Caltrans, 2013). Because the project would have no potential to double traffic volumes on existing roadways, the project's operational traffic noise increase would be less than 3 dB. Therefore, the impacts due to project-related operational vehicular traffic would be less than significant and the project would have no impact above those outlined in the DTPP Program EIR.

**b) Generation of excessive vibration or groundborne noise levels?**

The proposed project would generate construction vibration from equipment operating on the project site, and from the transport of construction equipment, materials, and workers to and from the site. Pile-driving and blasting, which cause excessive ground vibration, are not anticipated to be used for project construction or demolition. Project-related vibration was evaluated with respect to human perception and annoyance, and with respect to building damage from project construction and operation.

With respect to human perception, according to FTA guidelines, vibration levels of 65 to 80 vibration decibels (VdB), depending on the frequency of the vibration events,<sup>7</sup> would be considered as the threshold for human annoyance for residences and buildings where people normally sleep (FTA, 2018). These guidelines recommend 65 VdB for land uses where low ambient vibration is essential for interior operations (e.g., hospitals, high-tech manufacturing, laboratory facilities), and 80 VdB for residential uses and buildings where people normally sleep. Project construction-related vibration would result from the use of heavy earth-moving equipment for area clearing, temporary roadway grading, excavation, and embankment improvement.

These activities would produce a vibration level of approximately 87 VdB (0.089 inch per second PPV<sup>8</sup>) at a distance of 25 feet (which is the reference vibration level for operation of a large bulldozer (FTA, 2018). The distance between proposed construction activities and the closest acoustically sensitive uses would be approximately 5 feet (the existing office just west of the project site) to 100 feet (buildings to the east). Assuming a standard reduction of 9 VdB per doubling of distance (FTA, 2018), the project-related construction vibration level at the nearest receivers would be approximately 69 to 108 VdB, as shown in Table 3.13-2. These levels of vibration are above the established thresholds of significance, and would likely be perceptible. Therefore, this impact would be potentially significant and Mitigation Measure 11-3 and Mitigation Measure 11-4 from the DTPP Program EIR would be required to lessen potential impacts from vibration during project construction.

<sup>7</sup> 65 VdB for frequent events or More than 70 events per day, 75 VdB for occasional events, or 30 to 70 events per day; and 80 VdB for Infrequent Events or Fewer than 30 events per day.

<sup>8</sup> Construction vibration is assessed in terms of Peak Particle Velocity (PPV). PPV is defined as the maximum instantaneous positive or negative peak of the vibration signal. Ground-borne vibration related to human annoyance is generally related to root mean square velocity levels expressed in VdB.

**Table 3.13-2 Construction Equipment Vibration Levels (VdB, PPV) at the Nearest Noise-Sensitive Uses in the Project Area**

Receiver Location	Shortest Distance (feet) Between Noise-Sensitive Uses and Proposed Construction Areas	Project, Vibration Levels	
		PPV	VdB
East of Project Site	100	0.011	69
North of Project Site	80	0.016	72
West of Project Site	5	0.995	108
South of Project Site	65	0.021	75

Notes: PPV = peak particle velocity; VdB = vibration decibels.

Source: Data compiled by AECOM in 2019

With the above mitigation measures, the annoyance impact of project construction-related vibration would be less than significant.

With respect to building damage during project construction activities, according to FTA guidelines, a vibration-damage criterion of 0.20 inch per second Peak Particle Velocity (PPV) should be considered for non-engineered timber and masonry buildings. Furthermore, structures or buildings constructed of reinforced concrete, steel, or timber have a vibration-damage criterion of 0.50 inch per second PPV pursuant to the FTA guidelines (FTA, 2018). As shown in Table 3.13-2, project-related construction vibration level at 40 to 100 feet (representing distances to the nearest sensitive uses to the project site) would be approximately 0.011 to 0.044 PPV. This level of vibration is below any of the established threshold of significance and would not likely result in damage to adjacent structures. Therefore, this impact would be less than significant.

With respect to project operation, the only source of vibration under the proposed project operation would be heavy truck traffic accessing the site for deliveries and other occasional needs. Heavy truck traffic can generate ground-borne vibration; however, ground-borne vibration levels generated from vehicular traffic are not typically perceptible outside of the road right-of-way. This impact would be less than significant and the project would have no impacts beyond those analyzed in the DTPP Program EIR.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

The project site is approximately 2 miles south of San Carlos Airport but located outside the 55-dB CNEL contour. Because all project activities would occur outside of the 55-dB CNEL contour, the project would not expose people residing or working in the project area to excessive noise. Additionally, the project would not involve any aircraft uses for construction or operations and would not affect any airport operations. Therefore, the project would have no impact beyond those analyzed in the DTPP Program EIR.

### 3.13.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase noise impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from

project implementation, beyond those impacts previously identified in the DTPP Program EIR. The project would implement Mitigation Measures 11-1, 11-3 and 11-4, as presented in the DTPP Program EIR.

### ***Mitigation Measures***

- **Mitigation Measure 11-1.** Noise studies consistent with the requirements of the California Building Code shall be conducted for proposed new multifamily residential projects within the DPP, to identify noise reduction measures necessary to achieve compatibility with City Noise Element guidelines (55 dBA CNEL at sensitive exterior spaces) and Title 24 standards (45 dBA CNEL within residential units). Each noise study must be approved by the City's Building Inspection Division prior to issuance of a building permit. Identified noise reduction measures, in order of preference so that windows can be opened, may include:
  - Site and building design so as to minimize noise in shared residential outdoor activity areas by locating such areas behind the buildings, in courtyards, or orienting the terraces toward the interior of lots rather than streets;
  - Site and building design so as to minimize noise in the most intensively occupied and noise-sensitive interior spaces of units, such as bedrooms, by placing such interior spaces and their windows and other openings in locations with less noise exposure;
  - Windows and doors with a high Sound Transmission Class (STC) rating and noise attenuating wall assemblies.
  - Forced air mechanical ventilation systems in all units exposed to noise levels exceeding Title 24 standards to allow residents the option of reducing noise by keeping the windows closed.
- **Mitigation Measure 11-3.** Reduce ground-borne vibration levels that may be generated by future site-specific demolition and construction activities by imposing conditions of approval on all future projects involving demolition and construction activities, which conditions shall require the following ground-borne vibration abatement measures:
  - Restrict vibration-generating activity to between the hours of 7:00 a.m. and 5:00 p.m., Monday through Friday. Prohibit such activity on weekends and holidays.
  - Notify occupants of land uses located within 200 feet of pile-driving activities of the project construction schedule in writing.
  - Investigate in consultation with City staff possible pre-drilling of pile holes as a means of minimizing the number of percussions required to seat the pile.
  - Conduct a pre-construction site survey documenting the condition of any historic structure located within 200 feet of pile driving activities.
  - Monitor pile driving vibration levels to ensure vibration does not exceed appropriate thresholds for the building (5 mm/sec (0.20 inch/sec) ppv for structurally sound buildings and 2 mm/sec (0.08 inch/sec) ppv for historic buildings.
- **Mitigation Measure 11-4.** Reduce demolition and construction noise impacts on adjacent uses by imposing conditions of approval on all future projects involving demolition and construction activities, which conditions shall require the following conventional construction-period noise abatement measures:
  - *Construction Plan.* Prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with nearby noise-sensitive facilities so that construction activities and the event



schedule can be scheduled to minimize noise disturbance. This plan shall be provided to all noise-sensitive land uses within 500 feet of the construction site.

- *Construction Scheduling.* Ensure that noise-generating construction activity is limited to between the hours of 7:00 a.m. to 8:00 p.m. Monday through Friday. (*Redwood City Municipal Code Section 24.30*)
- *Construction Equipment Mufflers and Maintenance.* Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- *Equipment Locations.* Locate stationary noise-generating equipment required on construction project sites as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project site.
- *Construction Traffic.* Route all construction traffic to and from the construction sites via designated truck routes to the maximum extent feasible. Prohibit construction-related heavy truck traffic in residential areas where feasible.
- *Quiet Equipment Selection.* Use quiet construction equipment, particularly air compressors, wherever feasible.
- *Temporary Barriers.* Construct solid plywood fences around construction sites adjacent to residences, operational businesses, or noise-sensitive land uses.
- *Temporary Noise Blankets.* Temporary noise control blanket barriers should be erected along building facades of construction sites to attenuate noise from elevated activities if noise conflicts cannot be resolved by scheduling. (Noise control blanket barriers can be rented and quickly erected.)
- *Noise Disturbance Coordinator.* For projects that would last over one year in duration, the City may choose to require project designation of a "Noise Disturbance Coordinator" who would be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. Post in a conspicuous location a telephone number for the Disturbance Coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. (The project sponsor should be responsible for designating a Noise Disturbance Coordinator, posting the phone number, and providing construction schedule notices. The Noise Disturbance Coordinator would work directly with an assigned City staff member.)

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## 3.14 Population and Housing

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XIV. Population and Housing. Would the project:</b>					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 3.14.1 Program EIR Findings

The DTPP Program EIR determined there would be no significant impacts for population growth and displacement of housing and people. Implementation of the DTPP would allow for development of 2,500 housing units and 5,500 new residents in Redwood City. The population increase would represent 6 percent of the projected 2030 Redwood City population. The increase in population would result in a less-than-significant impact.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts, and no mitigation measures are required.

### 3.14.2 Project Analysis

**a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

The proposed project would not directly induce unplanned population growth in the City of Redwood City through residential development. The project would include 39 residential units, consistent with the development objectives of the DTPP. Assuming an average of 2.7 residents per unit<sup>9</sup>, there would be an increase of approximately 105 permanent residents, or approximately 1.9 percent of the expected new residents in Redwood City as a result of DTPP implementation.<sup>10</sup> The proposed project is part of the DTPP, and would not represent unplanned growth, because it is consistent with City and DTPP growth rates. Additionally, the proposed project is an infill site surrounded by existing development. There would be no road extensions or increases in infrastructure capacity, as discussed in Section 3.19, Utilities and Services, that could directly or indirectly induce unplanned growth.

The housing units are anticipated to be developed by 2023, and would represent 1.56 percent of the housing growth expected in Redwood City as a result of DTPP implementation. Therefore, the 105 new residents resulting from the proposed project would result in a minimal increase in the City's future growth forecasts with DTPP implementation. The projected increase in residents from the

<sup>9</sup> Average Household Size per Redwood City General Plan.

<sup>10</sup> Most units in the development would be studios and 1 bedroom, which generally have a lower occupancy rate than the overall City rate. However, for the purpose of this analysis, the average occupancy rate was used.

proposed project would be consistent with the City's population growth projection. Impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The project would not remove or displace existing housing or people, and would not necessitate the construction of replacement housing elsewhere. There would be no impact.

### 3.14.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase population and housing impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

### 3.15 Public Services

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XV. Public Services. Would the project:</b>					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
Fire protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The DTPP Program EIR analyzed solid waste impacts under Public Services. Per the updated thresholds in Appendix G of the CEQA Guidelines, potential impacts to solid waste are described under Section 3.19, Utilities and Services.

#### 3.15.1 Program EIR Findings

The DTPP Program EIR found that construction of new physical structures and increased population would create additional increased demand for fire protection and law enforcement services, in addition to parks and recreational facilities and local public schools. The increased demand could result in the need for new fire protection, police protection, and school facilities; however, construction of new facilities was not addressed in the DTPP Program EIR. The DTPP Program EIR did identify less-than-significant impacts on development of park and recreational facilities.

The DTPP Program EIR determined that there would be no significant impacts on fire/emergency medical service, parks and recreation, schools, or solid waste service resulting from DTPP implementation. The DTPP Program EIR did identify a potentially significant impact to emergency response and evacuation due to traffic congestion. Therefore, Mitigation Measure 8-1 directs the City to implement signal detectors to provide priority traffic signal timing for emergency response vehicles.

#### 3.15.2 Project Analysis

- a) **Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental**

**impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:**

**Fire Protection?**

Construction of the proposed project could result in a small, temporary increase in the demand for fire suppression and emergency medical services and police services due to the presence of construction personnel and construction activities in the area. Project staffing levels for construction would vary with onsite activities, but is not expected to exceed 10 construction workers. Required compliance with federal and state worker safety regulations would minimize the likelihood of workplace injuries and accidents requiring emergency response. Typical fire and safety precautions would be taken, such as prohibiting onsite fires; reporting any fires, even if they have been extinguished; discarding any smoking materials in approved containers; maintaining access to emergency vehicles; and maintaining access to fire hydrants, emergency water tanks and emergency turnouts. As a result, construction activities would not necessitate new or altered fire protection facilities or adversely affect emergency response times.

The proposed project would consist of 39 multi-family residential units that would result in approximately 105 new residents. The increased population at the site, compared to the relatively few existing employees onsite, could increase demand for the Redwood City Fire Department (RCFD) fire protection services and facilities. RCFD's Station #9 provides fire protection services to the existing development on the project site, and would continue to provide fire protection services (RCFD, 2019). However, because the project is 1.56 percent of the total housing growth planned as part of the DTPP, is an infill site, and nearby services are already available, the proposed project would not generate an unusual demand for fire protection to the extent that new or altered fire stations would be necessary.

The project applicant would also be required to incorporate California Fire Code requirements, which identify minimum requirements for providing a reasonable level of life safety and property protection from fire hazards. These requirements address fire hydrant locations, street width, circulation, and project access for fire and emergency response. In addition, the proposed project would comply with the City's requirements for installation of automatic sprinkler systems consistent with Section 12.18 of the City's Municipal Code. Furthermore, the project applicant must demonstrate, in conformance with the City's Engineering Standards and Conditions of Approval, that water supplies meet fire flow requirements. Review of the project plans by the RCFD and the Redwood City Community Development Department to confirm that applicable California Fire Code requirements and City standards are incorporated into project designs must be received prior to issuance of building permits, issuance of a certificate of occupancy, or final inspections.

Because the project would incorporate design standards to minimize the risk of fire at the project site and would not increase response times in the project area, the proposed project would not affect RCFD's response times or other performance objectives. Impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

**Police Protection?**

The proposed project would consist of residential uses that would increase demand for Redwood City Police Department (RCPD) services and facilities. RCPD provides service from one central police station, which is approximately 1.2 miles northeast of the project site at 1301 Maple Street (RCPD, 2019). Because the project site is currently developed, nearby services and patrols are already available.

Response times in the vicinity of the project site are typically less than 5 minutes for emergency calls; less than 7 minutes for priority calls; and approximately 7 minutes for routine calls. Because the project is 1.56 percent of the total housing growth planned as part of the DTPP, the proposed project would not affect RCPD's response times or other performance objectives, and would not result in the



construction of new or expansion of existing police protection facilities based on the demand generated by the project (Osborne, pers. comm., 2019) above what was anticipated in the DTPP Program EIR. Impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

### **Schools?**

Residential development within the project site would generate school-aged children within the Redwood City School District (RCSD) and Sequoia Union High School District (SUHSD) boundaries. Using RCSD's and SUHSD's student yield factors of 0.15 and 0.20 student per residential unit, respectively, the proposed development of 39 residential units could result in approximately six new elementary and middle school students (grades K–8), and approximately eight new high school students (grades 9–12) (Jack Schreder & Associates, 2018; Schoolhouse Services, 2013). This yield is a general estimate, and actual student generation could be different for different unit types.

Students occupying the project site would attend Clifford Elementary School (grades K-8) and Sequoia High School (grades 9-12). Enrollment at Clifford Elementary School is anticipated to decline between 2013 and 2023, and enrollment at Sequoia High School is anticipated to remain below design capacity beyond 2020 (RCSD, 2015; SUHSD, 2015). Based on these trends, Clifford Elementary School and Sequoia High School would have sufficient capacity to meet the demands of project-generated students without requiring the construction of additional facilities; and the proposed project would not result in a shortfall of elementary, middle, or high school services or facilities.

SB 50 (Chapter 407, Statutes of 1998) instituted a school facility program by which school districts can levy fees for construction or reconstruction of school facilities. SUHSD levies Level I developer fees. As of June 2018, Level I fees are \$3.79 per square foot for residential construction, and \$0.61 per square foot of commercial/industrial construction, although these fees may increase by the time development is proposed (Jack Schreder & Associates, 2018). SUHSD would share 60 percent of the developer fees with RCSD. Pursuant to SB 50, the project applicant would be required to pay all applicable State-mandated school impact fees to SUHSD. The California Legislature has declared that payment of the applicable school impact fee is deemed to be full and adequate mitigation under CEQA for impacts on school facilities (California Government Code Section 65996). Therefore, impacts would be less than significant, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

### **Parks? Other Public Facilities?**

Implementation of the proposed project would result in increased demand for parks. As discussed in Section 3.16, Recreation, Section 30, Article XII of the Redwood City Municipal Code requires all new residential development to dedicate land and/or pay an in-lieu fee to meet the City's parkland standard of 3.0 acres of developed parkland per 1,000 residents. Based on the estimated 105 new residents generated by the proposed project, approximately 0.32 acre of developed parks would be required to be consistent with the City's Municipal Code.

Because the project applicant would dedicate parkland or pay in-lieu fees, the proposed project would meet the City's parkland standard. The project would not result in substantial increase in demand for other public facilities, such as libraries or other government services. The project would not have any impacts above those analyzed in the DTPP Program EIR.

### **3.15.3 Conclusion**

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on public services disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

***Mitigation Measures***

No mitigation is required.

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### 3.16 Recreation

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XVI. Recreation. Would the project:</b>					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The DTPP Program EIR analyzed impacts to recreation under Public Services with the DTPP's impacts on parks. The analysis is separated here per the updated thresholds in Appendix G Environmental Checklist Form (2019).

#### 3.16.1 Program EIR Findings

The DTPP Program EIR found that minimal parkland exists within the Downtown area, and development of new residences would add new population that would in turn increase the demand for new and existing parks, as well as recreational facilities. However, the City requires new development to pay park in-lieu fees, which would aid in providing an increased amount of parkland so that the likelihood of overuse by new residents and accelerated physical deterioration of existing facilities would be reduced. In-lieu fees provided by new development could also be used by the City to improve, expand, and maintain existing City parks to ensure that accelerated deterioration does not occur. The increased demand for parks and recreational facilities would require the development of new parks. The DTPP Program EIR found that construction resulting from new public space improvements would be temporary, and would not result in significant impacts.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts, and no mitigation measures are required.

#### 3.16.2 Project Analysis

**a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The proposed project would provide approximately 1,500 square feet of private open space for use by building occupants. The proposed project would result in an increase in population of approximately 105 residents. There are nine parks, including recreational facilities, within 1 mile of the DTPP implementation area available for use by the incoming residents. Therefore, due to the proximity of available parks and recreational facilities, the proposed project population growth would not result in a substantial increase in the use of existing parks and recreational facilities to the extent that physical deterioration would be accelerated, or additional recreational facilities would need to be built.

Based on the Redwood City parkland standard of 3.0 acres of developed parkland per 1,000 residents, the project would need approximately 0.32 acre of park space. However, per the Redwood City Municipal Code, the project applicant would be required to pay park impact fees. These funds would help the City construct or improve park space in the area. Because the future locations of park space funded by the City's park impacts fee fund are unknown at this time, it is not possible to analyze the environmental effects of their construction. Because the project applicant would pay the applicable parkland impact fees, and because the project represents 1.56 percent of the total housing growth planned as part of the DTPP, the project would have a less-than-significant impact, and no impacts above those analyzed in the DTPP Program EIR.

**b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, the project would have no impact beyond those already analyzed in the DTPP Program EIR.

### 3.16.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase recreation impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

### 3.17 Transportation and Traffic

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XVI. Transportation. Would the project:</b>					
a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

CEQA Appendix G thresholds were updated in 2019 to emphasize VMT and de-emphasize level of service and parking impacts.

#### 3.17.1 Program EIR Findings

The DTPP Program EIR identified significant and unavoidable impacts at 17 area intersections, as well as impacts on four freeway segments, freeway ramp operations at one ramp, and transit service. Mitigations were suggested by the EIR; however, even with the implementation of these measures, these impacts could not be avoided, and no other feasible mitigations or alternatives would avoid or lessen the impacts.

The DTPP Program EIR also found that freeway ramps would continue to have sufficient capacity and operate at an acceptable level of service (LOS) under DTPP implementation, resulting in a less-than-significant impact.

In addition, the DTPP Program EIR found that DTPP implementation would promote multiple travel modes, including pedestrian and bicycles. This would result in a less-than-significant impact.

The DTPP Program EIR found that traffic generated by DTPP implementation could potentially slow emergency response and evacuation, resulting in a potentially significant impact. Therefore, Mitigation Measure 8-1 would be required to reduce the impact to less than significant. Mitigation Measure 8-1 requires the City to implement signal detectors at selected intersections as needed over time to provide priority traffic signal timing for emergency response vehicles; the signal timing project is under way.

#### 3.17.2 Project Analysis

##### a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The proposed project would comply with all applicable requirements of the DTPP and other City standards as relates to transportation. Consistent with the DTPP, the project would provide features

that encourage alternative modes of transportation, such as secured bicycle facilities and greater pedestrian connectivity through improved sidewalks. No conflict with any program plan, ordinance, or policy would result from project implementation. No significant impact would occur, and no impacts beyond those identified in the DTPP Program EIR would result.

**b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?**

Section 15064.3, subdivision (b), Criteria for Analyzing Transportation Impacts of the State CEQA Guidelines, includes provisions for evaluating a project's transportation impacts by using the VMT metric. According to the guidelines, a lead agency may elect to be governed by the provisions of Section 15064.3 immediately, or beginning on July 1, 2020, when the provisions will apply statewide. Section 15064.3(b)(3) of the State CEQA Guidelines allows a qualitative analysis of potential impacts related to VMT. In addition, Section 15064.3(b)(1) states that "...projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact."

As described above in Section 2.0, the project is located within 0.3 mile of the City's Transit Center, thereby meeting CEQA guidelines criteria for a project that would be considered to have a less-than-significant impact. Therefore, the expected additional vehicle trips are not anticipated to result in substantial increases in VMT.

The DTPP Program EIR did not discuss VMT thresholds as VMT was added to CEQA thresholds after the adoption of the DTPP Program EIR. As the project would not impact citywide or regional VMT this would not constitute a new impact.

**c) Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The project would not change the existing design features of nearby roads or highways in the project vicinity. Slow-moving trucks entering and exiting the project site during construction could pose a hazard to other vehicles traveling along El Camino Real and Jackson Avenue. Because construction activities would occur for only a short time, project construction would not substantially increase hazards because of a design feature or incompatible use. In addition, no unusual angles or other hazardous design elements would exist in the proposed circulation and access. Parking would be provided in a parking garage in the building.

Any new roadway reconfigurations, including parking lot entrances, would need to comply with City Conditions of Approval relating to parking garage entrances, which includes review of such access areas by City engineers. Additionally, the project would implement the City's Engineering Standards as they pertain to roadway design (Redwood City, n.d.), which provides design standards for driveways, off-street parking, and loading facilities. Therefore, impacts associated with increases in hazards due to a design feature would be less than significant, and there would be no impacts above those identified in the DTPP Program EIR.

**d) Result in inadequate emergency access?**

**Construction:** Any heavy vehicle traffic, such as haul trucks or flatbed trailers carrying equipment or materials, would be expected to use specified truck routes with adequate capacity and accommodations to handle such vehicles. As described in Section 2.6, Construction Activities and Schedule, site access during construction would be provided via a construction entrance off El Camino Real for heavy vehicles, unless precluded during limited periods by construction activities, with all other access (e.g., construction workers) provided via Jackson Avenue.

Project construction may result in a temporary lane closure of Jackson Avenue, but would allow emergency access traffic to the project site. Additionally, the project would comply with City's



Conditions of Approval as they relate to parking management and lane closures during construction. Because the proposed project would develop and implement a construction traffic management plan, impacts associated with inadequate emergency access during construction would be less than significant, and would have no impacts above those identified in the DTPP Program EIR.

**Operation:** Once project construction is completed, the existing street network, including lane configurations, intersection geometrics, and traffic controls, would operate as it does currently. Additionally, the project would implement the City's Conditions of Approval requiring Radio Coverage for Emergency Responders, which states that all buildings and parking garages have approved radio coverage for emergency responders. Emergency access to the site and surrounding area would generally continue to be provided as under existing conditions. Therefore, the project's operational impacts on transportation-related hazards and emergency access would be less than significant.

### 3.17.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase the impacts on transportation disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### ***Mitigation Measures***

No mitigation is required.

#### **References:**

City of Redwood City, n.d. Engineering Standards. Available: <https://www.redwoodcity.org/departments/community-development-department/engineering-transportation/engineering/engineering-standards>. Accessed May 2019.

### 3.18 Tribal Cultural Resources

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XVIII. Tribal Cultural Resources. Would the project:</b>					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listed in the California Register of Historical Resources, or in local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Tribal Cultural Resources was added to the CEQA Guidelines Appendix G checklist in 2017, after the DTPP Program EIR was certified in 2010. However, the general issue of Native American cultural resources was addressed in the DTPP Program EIR, as noted below.

#### 3.18.1 Program EIR Findings

The DTPP Program EIR did not specifically identify or address impacts related to tribal cultural resources within the DTPP implementation area. However, the DTPP Program EIR did determine that Native American cultural resources have been found in San Mateo County. The DTPP Program EIR determined that due to the location of the DTPP area near former wetlands and on alluvial fans dating to the Holocene period, the likelihood of unrecorded Native American cultural resources existing in the DTPP area is considered high, resulting in a potentially significant impact. To address this impact, the City developed, Mitigation Measure 7-1 so that in the event that any deposits of prehistoric or historic archaeological materials, including tribal cultural resources, are encountered during project construction activities, all work within an appropriate buffer area shall be stopped, and a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted to assess the deposit and make recommendations, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery.

### 3.18.2 Project Analysis

- a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geologically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
  - fi) **Listed or eligible for listed in the California Register of Historical Resources, or in local register of historical resources as defined in Public Resources Code section 5020.1(k)?**
  - ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

*The following discussion addresses items i) and ii).*

The proposed project would include construction activities that may disturb previously unknown resources. These resources could include artifacts of importance to local Native American tribes. Given the level of previous disturbance on the project site, it is not expected that tribal cultural resources remain onsite. However, it is possible that previously unknown buried resources could be encountered during ground-disturbing work. In the event that a tribal cultural resource is discovered, appropriate measures would be implemented to minimize potential impacts. Therefore, Mitigation Measure 7-1 would be applicable to the proposed project. Implementation of Mitigation Measure 7-1 would reduce impacts to a less-than-significant level and the project would have no impacts beyond those analyzed in the DTPP Program EIR.

### 3.18.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on tribal cultural resources as addressed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR. The project would implement Mitigation Measure 7-1, as described in the DTPP Program EIR.

#### ***Mitigation Measures***

**Mitigation Measure 7-1.** See discussion in Section 3.5, Cultural Resources, for the text of this mitigation measure.

### 3.19 Utilities and Services

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XIX. Utilities and Service Systems. Would the project:</b>					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The DTPP Program EIR analyzed solid waste impacts under Public Services. Per the updated Appendix G Checklist Form (2019), potential impacts to solid waste are described here, under Section 3.19, Utilities and Services.

#### 3.19.1 Program EIR Findings

The DTPP Program EIR found that the City's Urban Water Management Plan (UWMP) accounts for development occurring under the DTPP, and concludes that adequate water supply exists to serve the projected growth. Therefore, the DTPP would have no impact related to water supply.

The DTPP Program EIR determined that under DTPP implementation, the City's existing water lines have the capacity to serve proposed development for the average day and maximum day conditions. Accordingly, impacts relating to the water distribution system associated with the DTPP would be less than significant.

The DTPP Program EIR also determined that the need for internal fire booster pumps associated with DTPP implementation would vary depending on the type and configuration of proposed buildings. However, impacts associated with construction of water system improvements would be less than significant.

The DTPP Program EIR found that the South Bayside System Authority (SBSA) wastewater treatment plant would not be significantly impacted by development allowed under the DTPP, and existing wastewater treatment capacity would be sufficient to meet future demand from the DTPP. The DTPP Program EIR found that even with additional demand, SBSA's 10-year capital improvement program would ensure that the facility is able to continue to meet or exceed the wastewater treatment requirements established for it by the RWQCB. Therefore, impacts would be less than significant.

The DTPP Program EIR found that due to the built-out nature of the DTPP area, there would be no increase in stormwater runoff anticipated for the DTPP buildout scenario. Therefore, there would be minimal differences between the DTPP buildout scenario and existing conditions in terms of stormwater runoff. Impacts on storm drainage from future development would be less than significant. The DTPP Program EIR also found that development in accordance with the DTPP would increase demand for solid waste collection and disposal services. However, future development is not expected to generate a significant amount of solid waste that would be inconsistent with land use plans, policies, or regulation. Impacts would be less than significant.

The DTPP Program EIR concluded that DTPP implementation would not result in significant impacts on utilities, and no mitigation measures are required.

### 3.19.2 Project Analysis

**a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

The proposed project would include connecting to existing water, wastewater treatment, storm drainage, electrical, natural gas, and telecommunications facilities. New water, sanitary sewer, and storm drain infrastructure would be designed in accordance with City's Engineering Standards Volume 3, Part VI, which details design criteria for public and private water systems, sanitary sewer systems, and the City's Engineering Standards Volume 3, Part V for storm drains. The DTPP Program EIR concluded that development occurring under the DTPP would not necessitate the construction or expansion of water or wastewater treatment facilities. The project would add 39 housing units, which is 1.56 percent of the total development planned as part of the DTPP. Therefore, the proposed project would not result in the need for new or expanded water or wastewater treatment facilities beyond what was analyzed in the DTPP Program EIR.

Electrical, natural gas, and telecommunications facilities are available at the project site. Onsite improvements to PG&E (electric and gas), AT&T, Comcast, and Wave G (telecommunications) would occur during construction if necessary to serve the project in accordance with applicable standards of the utility providers.

The proposed project would not require or result in the relocation or construction of a new or expanded water, wastewater treatment, or electric power, natural gas, or telecommunications facilities, because those facilities are currently sufficient to serve the project site. The project includes the installation of two new sewer manholes and a short distance of sewer main, as well as the installation of a storm drain main along the project's Jackson Avenue frontage. The sewer improvements allow the project to connect to an existing sewer system with sufficient capacity. The storm drain improvements serve to capture drainage from the site as well as the Jackson Avenue street frontage. However, since the project is not increasing runoff in either of these areas, there is no additional capacity required within the existing system. While the project is required to include a dual plumbing system and allow for the future use of recycled water for irrigation, no construction of a recycled water main is required to serve the project. Therefore, the project would have a less-than-significant impact, and would have no impacts above those analyzed in the DTPP Program EIR.

**a) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

The DTPP Program EIR concluded that proposed development under the DTPP was accounted for in the City's 2015 UWMP, and there would be adequate water supply to serve the anticipated growth. As discussed in Section 3.14, Population and Housing, the anticipated growth associated with the proposed project is consistent with the growth assumed under DTPP implementation. The project is 1.56 percent of the total housing growth planned as part of the DTPP, and 1.9 percent of the total population growth planned as part of the DTPP. Additionally, the City is expected to have adequate water supplies during normal years to meet its total projected demands through 2040 (EKL, 2016). During dry and multiple-dry years, the City expects to experience some supply shortfalls. However, the City anticipates implementation of its Water Shortage Contingency Plan would provide additional water supplies to meet demands during these years (EKL, 2016). Additionally, the proposed project would also be required to meet the required fire flow velocities and flow durations pursuant to the California Fire Code and Redwood City Engineering Standards.

The proposed project would also be required to implement measures described in Chapter 6 of the 2016 CALGreen Code (CCR Title 24, Part 11) to reduce indoor demand for potable water and reduce landscape water usage.<sup>11</sup> In dry or multiple dry years, the project would comply with the City's Water Shortage Contingency Plan.

The proposed project's anticipated water demand is approximately 5.76 acre-feet per year. The proposed project's water demand was calculated using the Redwood City Engineering Design Standards Attachment Q (City, 2019a). Because the water demand estimated for the proposed project could be accommodated by the existing water supplies identified in the City's 2015 UWMP and DTPP Program EIR, and would comply with mandatory water conservation regulations, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple-dry years. There would be a less-than-significant impact. The project would not have any impacts above those analyzed in the DTPP Program EIR.

**b) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

Wastewater generation is estimated by the City to be 95 percent of indoor water demand (City, 2019b). The proposed project's anticipated wastewater generation is approximately 4,890 Avg. Daily Demand (gdp). The proposed project's sewer demand was calculated using the Redwood City Engineering Design Standards Attachment L. Wastewater flows from the proposed project would represent less than 1 percent of SBSA's operation capacity, and the DTPP Program EIR concluded that the SBSA wastewater treatment plant would be able to meet or exceed wastewater treatment requirements, even with the additional wastewater generated from DTPP implementation.

The project would be required to comply with existing water conservation policies enacted by the City that would minimize the amount of wastewater generated. In addition, the proposed project would be required to implement measures described in Chapter 6 of the 2016 CALGreen Code (Title 24, Part 11 of the CCR) to reduce indoor demand for potable water, which would further minimize wastewater flows.

The project applicant would also be required to reduce infiltration and inflow to offset increased demand on the wastewater collection system from the project during wet weather by replacing aged sewer mains, or pay an equivalent in-lieu fee. Additionally, per the City's Conditions of Approval, the

<sup>11</sup> The proposed project would be required to implement measures described in Chapter 6 of the 2016 CALGreen Code (Title 24, Part 11 of the California Code of Regulations). These measures would reduce indoor demand for potable water by 20%, and reduce landscape water usage by 50%. It also requires separate water meters for nonresidential buildings' indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects.



project applicant would submit and obtain approval from the City, an evaluation and report prepared by a licensed engineer demonstrating that the existing sewer mains have sufficient capacity for the project. Because the existing wastewater treatment facilities has sufficient capacity, and the project applicant would implement upgrades and/or make payment of in-lieu fees, there would be a less-than-significant impact on wastewater collection and treatment facilities, and the project would not have any impacts above those analyzed in the DTPP Program EIR.

- c) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**
- d) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

*The following discussion addresses items c) and d).*

The proposed project would comply with statutes and regulations related to solid waste disposal, including the 2016 CALGreen Code and the Recycling and Salvaging of Construction and Demolition Debris Code (Section 9, Article XI of the Redwood City Municipal Code). Additionally, the DTPP Program EIR determined there is sufficient landfill capacity to accommodate the project's solid waste disposal needs. The project represents 1.56 percent of the total housing development envelope; therefore, the project would not have any impacts above those analyzed in the DTPP EIR, and impacts would be less than significant.

### 3.19.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase impacts on utilities and service systems disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### **Mitigation Measures**

No mitigation is required.

#### **References**

- EKI. 2016. 2015 Urban Water Management Plan for the City of Redwood City. June. Available: <https://www.redwoodcity.org/departments/public-works/water>. Accessed May 2019.
- Redwood City. 2019a. Engineering Standards, Volume 3, Attachment Q: Water Demand Worksheet. Available: <https://www.redwoodcity.org/departments/community-development-department/engineering-transportation/engineering/engineering-standards/volume-3-design-criteria>. Accessed August 2019.
- \_\_\_\_\_. 2019b. Engineering Standards, Volume 3, Attachment L: Sewage Generation Projection Worksheet. Available: <http://www.redwoodcity.org/home/showdocument?id=7705>. Accessed August 2019.

## 3.20 Wildfire

ENVIRONMENTAL ISSUES	Significant Impact	Less Than Significant or Less than Significant with Mitigation Incorporated	No Impact	Analyzed in the Prior EIR	Substantially Mitigated by Uniformly Applicable Development Policies
<b>XX. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Wildfire was added to the CEQA Guidelines Appendix G checklist in 2019, after the DTPP Program EIR was certified in 2010.

### 3.20.1 Program EIR Findings

The DTPP Program EIR did not specifically identify or address impacts related to wildfire within the DTPP implementation area. However, impacts related to wildland fire and risk are addressed in Section 3.9, Hazards, impact g. Because information on wildfires was known, or could have been known, when the Program EIR was certified, it is not considered new information as specifically defined under CEQA. This is consistent with the First District Court of Appeal's ruling in *Concerned Dublin Citizens v. City of Dublin*, 214 Cal.App.4th 1301 (2013).

### 3.20.2 Project Analysis

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**
- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

*The following discussion addresses items a) through d).*

The project site is not within a State Responsibility Area or within a Very High Fire Hazard Severity Zone, and is more than 1.5 miles from the nearest such area or zone (CAL FIRE, 2007; 2008). In addition, as discussed in Section 3.8, Hazards under Impact g, due to the urban nature and relatively flat topography of the project site and surrounding areas, the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. There would be no impact.

### 3.20.3 Conclusion

Based on the project-specific analysis of the proposed development on Parcel F, project implementation would not increase wildfire impacts disclosed previously in the DTPP EIR. Therefore, no increase in the severity of a previously identified significant impact and no new significant impact would result from project implementation, beyond those impacts previously identified in the DTPP Program EIR.

#### **Mitigation Measures**

No mitigation is required.

#### **References:**

CAL FIRE. 2007. Fire Hazard Severity Zones in State Responsibility Areas adopted by CAL FIRE, San Mateo County. Available: [http://frap.fire.ca.gov/webdata/maps/san\\_mateo/fhszs\\_map.41.pdf](http://frap.fire.ca.gov/webdata/maps/san_mateo/fhszs_map.41.pdf). Accessed June 2019.

\_\_\_\_\_. 2008. Very High Fire Hazard Severity Zones in Local Responsibility Areas as recommended by CAL FIRE, San Mateo County. Available: [http://frap.fire.ca.gov/webdata/maps/san\\_mateo/fhszl\\_map.41.pdf](http://frap.fire.ca.gov/webdata/maps/san_mateo/fhszl_map.41.pdf). Accessed June 2019.