

Final

REDWOOD CITY TRANSIT DISTRICT DTPP AMENDMENTS

Subsequent Environmental Impact Report

State Clearinghouse No. 2021080554

Prepared for
City of Redwood City

October 2022



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TABLE OF CONTENTS

Redwood City Transit District DTPP Amendments Final EIR

	<u>Page</u>
Chapter 1	1-1
Introduction and List of Commenters	1-1
1.1 Introduction	1-1
1.1.1 Purpose of this Document.....	1-1
1.1.2 Environmental Review Process	1-2
1.1.3 Method of Organization.....	1-3
1.1.4 Draft SEIR Recirculation Not Required.....	1-3
1.2 Agencies, Organizations and Individuals Commenting on the Draft SEIR	1-4
1.2.1 List of Commenters on the Draft SEIR	1-4
Chapter 2	2-1
Revisions to the Draft SEIR	2-1
2.1 Overview	2-1
2.2 Revisions to the Draft SEIR	2-1
Chapter 2, Executive Summary	2-1
Chapter 3, Project Description.....	2-2
Chapter 5, Population and Housing.....	2-3
Chapter 9, Transportation and Circulation.....	2-4
Chapter 11, Noise and Vibration.....	2-4
Chapter 13, Climate Change	2-6
Chapter 19, Alternatives	2-8
Chapter 3	3-1
Comments and Responses	3-1
3.1 Introduction	3-1
3.2 Comments and Responses.....	3-1
3.2.1 Draft SEIR Comment Letters – Agencies	3-3
3.2.2 Draft SEIR Comment Letters – Organizations.....	3-8
3.2.3 Draft SEIR Comment Letters – Individuals.....	3-53
3.2.4 Draft SEIR Public Hearing Summary.....	3-74
3.3 References.....	3-84
Chapter 4	4-1
Mitigation Monitoring and Reporting Program	4-1
4.1 Introduction	4-1
4.2 Format of the MMRP.....	4-1
4.3 Enforcement.....	4-2

List of Figures

Figure 3-1 (revised)	Project Site Location	2-3
Figure 9-1 (revised)	Existing and Planned Bike Facilities	2-4
Figure 9-2 (revised)	Existing Transit Service.....	2-5
Figure 11-2 (revised)	Noise Monitoring Locations.....	2-6

List of Tables

Table 1-1	Public Agency Commenting in Writing on the Draft SEIR.....	1-4
Table 1-2	Organizations Commenting in Writing on the Draft SEIR.....	1-5
Table 1-3	Individuals Commenting in Writing on the Draft EIR	1-5
Table 1-4	Individuals Commenting on the Draft SEIR, Public Hearing	1-6
Table 4-1	Summary of Transit District DTPP Amendments Mitigation Measures.....	4-3

Chapter 1

Introduction and List of Commenters

1.1 Introduction

1.1.1 Purpose of this Document

The proposed Transit District DTPP Amendments would consist of amendments to the City's General Plan and Downtown Precise Plan (DTPP) that would create a new sub-area, the Transit District area, within the DTPP area focused on transit-oriented development. In addition to creating the Transit District area boundaries, identifying a Transit District-specific development cap for office use, and adding residential development potential, the proposed Transit District DTPP Amendments envision a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center; make circulation improvements; and alter some land use controls (development standards) to support transit-oriented development.

Pursuant to the California Environmental Quality Act (CEQA), the City determined that a program-level Subsequent Environmental Impact Report (SEIR) is necessary to evaluate the environmental impacts of the proposed Transit District DTPP Amendments. As required by CEQA, this SEIR: (1) assesses the potentially significant direct and indirect environmental impacts, as well as the potentially significant cumulative impacts, associated with implementation of the proposed Transit District DTPP Amendments; (2) identifies feasible means of avoiding or substantially lessening significant adverse impacts; and (3) evaluates a range of reasonable alternatives to the proposed project. The City of Redwood City is the Lead Agency for the environmental review of the proposed Transit District DTPP Amendments.

As described in greater detail under Section 1.1.2, Environmental Review Process, below, the City published a Draft SEIR on the proposed Transit District DTPP Amendments on May 6, 2022, and the public review period for the document ended on June 21, 2022. The Draft SEIR, together with this Response to Comments document, and associated appendices – see Section 1.1.2.3, below, constitute the Final SEIR for the proposed Transit District DTPP Amendments in fulfillment of the requirements of CEQA and consistent with the CEQA Guidelines Section 15132.

According to CEQA Guidelines Section 15090, the Final SEIR will be considered by the decision-makers before approval of the implementation of the proposed Transit District DTPP Amendments to ascertain that the SEIR reflects the Lead Agency's independent judgment and analysis of the physical impacts of the proposed Transit District DTPP Amendments on the environment.

This Response to Comments document provides written responses to comments received during the public review period for the Draft SEIR. It contains a list of parties that commented on the

Draft EIR; copies of comments received on the Draft SEIR; and written responses to those comments. It also contains revisions to the Draft SEIR to clarify or correct information in the Draft SEIR. Section 1.1.3, Method of Organization, below, provides a description of the overall contents and organization of this Response to Comments document.

1.1.2 Environmental Review Process

1.1.2.1 Notice of Preparation and Public Scoping

On August 27, 2021, a Notice of Preparation (NOP) was published for the Transit District DTPP Amendments SEIR. A 31-day public comment period ended on September 27, 2021. A copy of the NOP is included in **Appendix A** in this Final SEIR. The City also held a scoping meeting before the City Planning Commission on September 7, 2021 via Zoom and in person (hybrid meeting) to accept public input on environmental topics to be analyzed in the SEIR and approaches to the impact analyses.

1.1.2.2 Draft SEIR Public Review

On May 6, 2022, the City released the Draft SEIR on the proposed Transit District DTPP Amendments for public review. A 47-day public review and comment period on the Draft SEIR began on May 6, 2022 and closed on June 21, 2022. During the public review period, the City received one comment letter from a governmental agency, 6 comment letters from organizations, and 8 comment letters from individuals. The City also held a public hearing before the City Planning Commission on June 21, 2022 to receive oral comments on the Draft SEIR. Additionally, the City received two comment letters from governmental agencies following the close of the comment period and, at its discretion, has elected to respond to the comments in these letters.

1.1.2.3 Final SEIR: Draft SEIR and Response to Comments Document

This Final SEIR consists of:

- The Draft SEIR, and associated appendices; and
- The Response to Comments document, as described under Section 1.1.1, above, and Section 1.1.3, below.

The City of Redwood City Council will consider whether to certify the Final SEIR as complying with the requirements of CEQA prior to deciding whether to approve the proposed Transit District DTPP Amendments. The City will notify all agencies that submitted comments on the Draft SEIR of the availability of the Final SEIR at least 10 days prior to the City Council certification of the Final SEIR (CEQA Guidelines, Section 15088(b)). Furthermore, the City is electing to make the Final SEIR available at least 10 days prior to the Planning Commission meeting for review and recommendation of the Final SEIR.

Prior to approval of a project for which the EIR identifies significant environmental effects, CEQA requires the adoption of Findings of Fact (CEQA Guidelines, Sections 15091 and 15092). If the Findings of Fact identify significant adverse impacts that cannot be avoided or substantially

lessened, the City Council must adopt a statement of overriding considerations for those impacts (CEQA Guidelines, Section 15093(b)).

1.1.3 Method of Organization

The Response to Comments document is organized as follows:

Chapter 1 – Introduction and List of Commenters: This chapter describes the purpose of the Response to Comments document, summarizes the project under consideration, and describes the organization of this document. This chapter also contains a list of all parties that submitted comments on the Draft SEIR during the public review period.

Chapter 2 – Revisions to the Draft SEIR: This chapter presents changes and revisions to the Draft EIR. The City made changes and revisions to the Draft SEIR either in response to comments received on the document, or as necessary to clarify statements and conclusions made in the document. None of the changes and revisions in Chapter 2 substantially affect the analysis or conclusions presented in the Draft SEIR.

Chapter 3 – Comments and Responses: This chapter contains the comment letters received during the public review period for the Draft SEIR, and the City’s responses to significant environmental points raised in these letters.

Chapter 4 – Mitigation Monitoring and Reporting Program: This chapter contains the Mitigation Monitoring and Reporting Program (MMRP) to guide the City in its implementation and monitoring of measures adopted in the SEIR, and to comply with the requirements of Public Resources Code section 21081.6(a).

1.1.4 Draft SEIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when “significant new information” is added to an EIR because the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a project’s significant environmental effects or feasible mitigation measures or alternatives to reduce or avoid such effects that are not proposed for adoption. The comments, responses, and Draft SEIR revisions, including discussions of a new Alternative 4, Reduced Office Alternative, presented in this document do not constitute such “significant new information;” instead, they clarify, amplify, or make insignificant modifications to the Draft SEIR. For example, none of the comments, responses, and Draft SEIR revisions disclose new or substantially more severe significant environmental effects of the proposed Transit District DTPP Amendments, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft SEIR that would clearly lessen the proposed Transit District DTPP Amendments’ significant effects.

1.2 Agencies, Organizations and Individuals Commenting on the Draft SEIR

This Response to Comments document provides written responses to comments received on the Draft SEIR during its public review period (May 6, 2022 through June 21, 2022), including all written comments submitted either by letter or email, and all oral comments presented at the public hearing for this document.

This section lists all agencies, organizations, and individuals (“persons”) who submitted comments on the Draft SEIR. Persons who submitted written comments are grouped according to whether they represent a public agency, organization, or an individual citizen, as well as persons who provided oral comments at the public hearing.

For each commenter on the Draft SEIR, the person’s name, agency or organization as applicable, comment format, comment date, and a commenter code are provided. The commenter codes were assigned to facilitate the preparation of responses, and there is a unique commenter code for each comment letter, email, and public hearing transcript based on the name of the agency, organization, or individual submitting the comment. Comments submitted by mail, email, or orally at the public hearing are all coded and numbered the same way.

The commenter code for comments on the Draft SEIR begins with a prefix indicating whether the commenter represents a public agency (A), an organization (O), an individual (I), or a speaker at the public hearing (PH). This is followed by a hyphen and the acronym of the agency or organization, or the individual’s last name.

The commenter codes are used to identify individual comments on separate topics within each comment letter, email, or public hearing summary. Each individual comment from each commenter are bracketed and numbered sequentially following the commenter code. The bracketed comments and corresponding comment codes are shown in the margins of the comments. There is a unique comment code for each distinct comment.

1.2.1 List of Commenters on the Draft SEIR

1.2.1.1 List of Public Agencies Commenting in Writing on the Draft SEIR

Table 1-1, below, presents the public agency commenting in writing on the Draft SEIR.

**TABLE 1-1
PUBLIC AGENCY COMMENTING IN WRITING ON THE DRAFT SEIR**

Commenter Code	Name of Agency	Comment Format	Comment Date
A-CAL	Yunsheng Luo acting for Mark Leong, District Branch Chief, Local Development Review, California Department of Transportation	Letter	06/21/2022
A-SAM	Christy Wegener, Planning Director, San Mateo County Transit District (SamTrans)	Letter	08/24/2022

A-JPB	Brian W. Fitzpatrick, Director, Real Estate and Development, Peninsula Corridor Joint Powers Board (Caltrain)	Letter	09/12/2022
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SOURCE: City of Redwood City, 2022

1.2.1.2 List of Organizations Commenting in Writing on the Draft SEIR

Table 1-2, below, provides a list of all organizations commenting in writing on the Draft SEIR.

**TABLE 1-2
ORGANIZATIONS COMMENTING IN WRITING ON THE DRAFT SEIR**

Commenter Code	Name of Person and Organization Submitting Comments	Comment Format	Comment Date
O-GA	Zoe Siegel, Director of Climate Resilience, Greenbelt Alliance	Letter	06/06/2022
O-CSMC1	Amy Buckmaster, President and CEO, Chamber San Mateo County	Email	06/07/2022
O-CSMC2	Amy Buckmaster, President and CEO, Chamber San Mateo County	Letter	06/21/2022
O-HAC	Ali Sapirman, South Bay Organizer, Housing Action Coalition	Email	06/21/2022
O-LS	Kelly M. Rem, Lozano Smith Attorneys at Law, on behalf of the Sequoia Union High School District	Letter	06/21/2022
O-LEH	Alan Chamarro, Executive Vice President, Lowe; Andrea Osgood, Vice President of Real Estate Development, Eden Housing	Letter	undated

SOURCE: City of Redwood City, 2022

1.2.1.3 List of Individuals Commenting in Writing on the Draft SEIR

Table 1-3, below, provides a list of all individuals commenting in writing on the Draft SEIR.

**TABLE 1-3
INDIVIDUALS COMMENTING IN WRITING ON THE DRAFT EIR**

Commenter Code	Name of Individual Submitting Comments	Comment Format	Comment Date
I-Bloomquist	Bloomquist, Cary	Email	05/14/2022
I-Felong	Felong, Claire	Email	05/22/2022
I-Mansfield	Mansfield, Jason	Email	06/07/2022
I-Zambrano	Zambrano, Diego A.	Email	06/10/2022
I-Molony	Molony, Clem	Letter	06/14/2022
I-Schuch	Schuch, Clifford	Letter	06/14/2022
I-Shoe	Shoe, Bill	Letter	06/20/2022
I-Babbitt	Babbitt, Glenn	Email	06/20/2022

SOURCE: City of Redwood City, 2022

1.2.1.4 List of Individuals Commenting Orally at the Public Hearing on the Draft SEIR

Table 1-4, below, provides a list of all individuals commenting orally at the public hearing on the Draft SEIR.

**TABLE 1-4
INDIVIDUALS COMMENTING ON THE DRAFT SEIR, PUBLIC HEARING**

Commenter Code	Name of Individual Submitting Comments	Comment Format	Comment Date
PH-Litvak	Litvak, Gwen	Meeting Minutes	06/21/2022
PH-Greenway	Greenway, Greg	Meeting Minutes	06/21/2022
PH-Stivers	Stivers, Evelyn	Meeting Minutes	06/21/2022
PH-Fogerty	Fogerty, Nadine	Meeting Minutes	06/21/2022
PH-Rocha	Rocha, Vince	Meeting Minutes	06/21/2022
PH-Brandt	Brandt, Adrian	Meeting Minutes	06/21/2022
PH-Solis	Solis, Rick	Meeting Minutes	06/21/2022
PH-Chu	Chu, Isabella - Commissioner	Meeting Minutes	06/21/2022
PH-Crnogorac	Crnogorac, Filip - Commissioner	Meeting Minutes	06/21/2022
PH-Hunter	Hunter, Rick – Commissioner Vice Chair	Meeting Minutes	06/21/2022
PH-Martinez	Martinez, Elmer - Commissioner	Meeting Minutes	06/21/2022

Chapter 2

Revisions to the Draft SEIR

2.1 Overview

This chapter presents revisions to the text, tables and/or figures to the Draft SEIR. These revisions include both (1) revisions made in response to comments on the Draft SEIR, as well as (2) City staff-initiated text changes to correct minor inconsistencies, to add minor updates to information or clarification related to the proposed Redwood City Transit District DTPP Amendments, and/or provide updated information where applicable. None of the revisions or corrections in this chapter substantially change the analysis and conclusions presented in the Draft SEIR.

The chapter includes all revisions to the Draft SEIR (see Section 2.2) in the sequential order that they appear in those documents. Preceding each revision is the section/page number in the Draft SEIR where the revision occurs. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in underline (underline).

2.2 Revisions to the Draft SEIR

Chapter 2, Executive Summary

Draft SEIR, Chapter 2, *Executive Summary*, page 2-1, the third and fourth sentences of the second partial paragraph under Section 2.1, *Project Overview*, is revised as follows in light of the fact that the City's Housing Element Update is not anticipated to be approved until 2023:

However, no cap on the number of residential units would be established, consistent with the state's Housing Accountability Act (HAA; Government Code Sec. 65589.5) and Housing Crisis Act (HCA), and the existing cap on residential development in the DTPP would be eliminated. ~~Also consistent with these state laws, the cap on residential development in the DTPP is proposed to be eliminated by the City Council's adoption of a new Redwood City General Plan Housing Element in late 2022.~~ [footnote omitted]

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-12, third column, the first bullet under Mitigation Measure NO-3 is revised as follows to ensure consistency with Mitigation Measure NO-1:

- Restrict vibration-generating activity to between the hours of 7:00 AM and 5:00 PM, Monday through Friday, except when authorized by the Building Official (Redwood City Municipal Code Section 24.32). ~~Prohibit such activity on weekends and holidays.~~

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-15, third column, Item 1 under “Operational Emission Reductions,” Mitigation Measure AQ-2b is revised as follows to reflect revisions to Mitigation Measure CC-1:

1. As required by Mitigation Measure CC-1, projects ~~shall be constructed without natural gas infrastructure and shall be~~ comply with the “all electric-” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed.
2. As required by Mitigation Measure CC-1, projects shall provide EV charging infrastructure consistent with the City’s Reach Codes or the applicable Tier 2 CALGreen standards in effect at the time, whichever is more restrictive.

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-16, third column, Mitigation Measure CC-1 is revised as follows:

Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2: Subsequent development projects proposed as part of the Transit District DTPP Amendments shall ~~not be eligible for exceptions from~~ comply with the “all electric” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed, and shall comply with EV requirements in the City’s Reach Codes or the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed, whichever is more restrictive. Subsequent development projects may qualify for exceptions to Reach Codes all-electric requirements.

Draft SEIR, Chapter 2, *Executive Summary*, page 2-20, the second paragraph under the heading, 2.5, Summary of Alternatives, is revised as follows, both to correct an editorial error in the summarization of significant, unavoidable impacts and to add a third alternative to the summary:

As discussed in the various SEIR chapters analyzing environmental topics (e.g., Cultural and Historic Resources, Public Services, Transportation and Circulation, Noise, Air Quality, Biological Resources, Geology and Soils), the proposed Transit District Amendments would result in ~~only one~~ significant impacts (and ~~its~~ corresponding cumulative impacts) that could not be mitigated to a less-than-significant level. ~~That~~ Those impacts involves the potential for regional criteria air pollutant emissions in excess of the Bay Area Air Quality Management District (BAAQMD) threshold from subsequent development projects within the Transit District area and the impact of the project’s emissions of greenhouse gases (GHGs), including a potential lack of full compliance with plans, policies, or regulations to reduce GHG emissions. Chapter 19 of this SEIR includes an analysis of the No Project Alternative, which is a CEQA requirement, a Reduced Development Alternative, ~~and~~ an Altered Land Use Mix Alternative, and a Reduced Office Alternative. The No Project Alternative would not implement the proposed Transit District Amendments, and future development in the area would be subject to the current DTPP and General Plan. The Reduced Development Alternative, ~~and~~ the Altered Land Use Mix Alternative, and the Reduced Office Alternative would each have somewhat lesser effects than would the proposed Transit

District Amendments with respect to impacts related to the intensity of development—traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities. With the exception of a potential impact of subsequent individual development project(s) with respect to criteria air pollutants and GHG emissions, which could be significant and unavoidable for each alternative, as ~~it could for~~ with the proposed Transit District DTPP Amendments, all of these impacts would be less than significant for each alternative, in some cases with mitigation. Impacts of each alternative related to the footprint of subsequent development projects—archaeological, tribal cultural resources, and historical resources; hazards and hazardous materials; geological and paleontological resources; and biological resources—would generally be the same as or similar to those of the proposed Transit District DTPP Amendments, and, as with the proposed Transit District DTPP Amendments, all would be less than significant, in some cases with mitigation.^[footnote omitted]

Chapter 3, Project Description

Draft SEIR, Chapter 3, *Project Description*, page 3-3, a minor staff-initiated change is made to Figure 3-1, Project Site Location, to ensure consistency in project site boundaries. The revised Figure 3-1 is presented at the end of this chapter.

Draft SEIR, Chapter 3, *Project Description*, page 3-6, the third and fourth sentences of the second partial paragraph under Section 3.5, *Project Components*, is revised as follows in light of the fact that the City’s Housing Element Update is not anticipated to be approved until 2023:

However, no cap on the number of residential units would be established, consistent with the state’s Housing Accountability Act (HAA; Government Code Sec. 65589.5) and Housing Crisis Act (HCA), and the existing cap on residential development in the DTPP would be eliminated. ~~Also consistent with these state laws, the cap on residential development in the DTPP is proposed to be eliminated by the City Council’s adoption of a new Redwood City General Plan Housing Element in late 2022.~~ ^[footnote omitted]

Chapter 5, Population and Housing

Draft SEIR, Chapter 5, *Population and Housing*, page 5-10, the last partial sentence (continuing on to page 5-11) is revised as follows.

This growth in office space would result in approximately 7,080 new employees by 2040, which would result in a demand for up to approximately 3,106,720 residential units, based on 1.5 employed residents per unit (the current ratio for San Mateo County). This total is conservatively high in that assumes that all jobs in the Transit District would be new to Redwood City and the region and that no existing workers would relocate from other jobs.

Chapter 9, Transportation and Circulation

Draft SEIR, Chapter 9, *Transportation and Circulation*, a minor staff-initiated change is made to Figure 9-1 to modify the figure title. The revised Figure 9-1, renamed as Existing and Planned Bike Facilities, is presented at the end of this chapter.

Draft SEIR, Chapter 9, *Transportation and Circulation*, minor staff-initiated changes are made to Figure 9-2, Existing Transit Service, to modify the legend heading to read “SamTrans Service by Weekday Frequency”, and to update transit routes to reflect SamTrans service changes that became effective in August 2022, after the Draft SEIR was published. The revised Figure 9-2 is presented at the end of this chapter.

To reflect August 2022 changes to SamTrans service in the Transit District area, Draft SEIR, Chapter 9, *Transportation and Circulation*, page 9-8, the second sentence under the heading, “SamTrans Bus Service” is revised as follows:

Eight SamTrans routes (~~95 [school days only]~~), 270, ~~275~~, 278, 295, 296, 2960 (OWL), 397 OWL, 398) and the El Camino Real (ECR) bus route run along El Camino Real and stops north of the Jefferson Avenue intersection, Winklebleck Street, Brewster Avenue, and the Redwood City Transit Center.

On the same page, to reflect August 2022 changes to SamTrans service in the Transit District area, Table 9-1 is replaced with a new Table 9-1, below (please note that revisions to this table are *not* shown in strikethrough and underline for the sake of table legibility):

Chapter 11, Noise and Vibration

Draft SEIR, Chapter 11, *Noise and Vibration*, a minor staff-initiated change is made to Figure 11-2, Noise Monitoring Locations, page 11-8, to ensure consistency in the project site boundaries. The revised Figure 11-2 is presented at the end of this chapter.

Draft SEIR, Chapter 11, *Noise and Vibration*, the first bullet in Mitigation Measure NO-3, Vibration Reduction, page 11-23, is revised as follows to ensure consistency with Mitigation Measure NO-1:

- Restrict vibration-generating activity to between the hours of 7:00 AM and 5:00 PM, Monday through Friday, except when authorized by the Building Official (Redwood City Municipal Code Section 24.32). ~~Prohibit such activity on weekends and holidays.~~

**TABLE 9-1
EXISTING TRANSIT SERVICE**

Route	From	To	Weekday		Weekends	
			Operating Hours	Peak Headway (minutes)	Operating Hours	Peak Headway (minutes)
SamTrans Local Bus Routes						
270	Redwood City Transit Center	Redwood City Transit Center	6:30am–7:10pm	60	7:30am–7:10pm	60
278	Redwood City Transit Center	Cañada College	6:20am–8:45pm	60	7:20am–7:15pm	60
295	San Mateo Caltrain	Redwood City Transit Center	6:20am–7:00pm	60	N/A	
296	Redwood City Transit Center	Palo Alto Transit Center	5:15am–10:40pm	20	7:45am–8:00pm	30
2960 (OWL)	Redwood City Transit Center	Palo Alto Transit Center	3:40 am – 2:10 am	30	3:45 am – 2:20 am	60
SamTrans Express Bus Routes						
ECR	Palo Alto Transit Center	Daly City BART	4:05am–1:50am	15	4:45am–2:25am	15
397 OWL	San Francisco	Palo Alto Transit Center	12:45am–6:40am	60	12:45am–6:40am	60
398	San Francisco	Redwood City Transit Center	6:00am–9:20pm	- Two morning runs - Two evening runs	N/A	
Caltrain						
All Routes	Gilroy/San José	San Francisco	4:20am–1:45am	10	7:10am–1:50am	60

SOURCE: Redwood City Transit District DTPP Amendments Transportation Analysis (Appendix B), 2022.

**TABLE 12-9
INCREASE IN VMT VERSUS SERVICE POPULATION GROWTH**

	Existing	2040 Transit District DTPP Amendments Buildout	Difference between Existing and Transit District DTPP Amendments Buildout	% Increase
Service Population	1,120	10,708	9,588	<u>856%</u> 284%
VMT^a	65,098	463,423	398,325	<u>612%</u> 265%

NOTE:

^a VMT data provided by Fehr & Peers.

SOURCE: Table compiled by ESA in 2022

Chapter 12, Air Quality

Draft SEIR, Chapter 12, *Air Quality*, Table 12-8, Consistency with Potentially Applicable Control Measures in 2017 Clean Air Plan Control Measures, page 12-25, third column of Row 3 is revised as follows to reflect revisions to Mitigation Measure CC-1:

SS30: Residential Fan Type Furnaces	SS30 will reduce emissions of NOx by creating more stringent limits on new and replacement central furnace installations. Strategies may include regulations regarding sale of fossil fuel-based space and water heating systems for residential and commercial use.	Consistent. All subsequent projects in the Transit District area would be required to <u>comply with the “all electric” requirement in use all-electric space and water heating systems for residential and commercial use, consistent with the Redwood City Reach Codes in effect at the time that a building permit application is filed.</u> Though the City’s Reach Codes allows for exemptions, Mitigation Measure CC-1 in the Climate Change section of this SEIR will require no exemptions to the all-electric requirement.
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Draft SEIR, Chapter 12, *Air Quality*, page 12-30, minor staff-initiated changes are made to the first paragraph of text and to Table 12-9, Increase in VMT versus Service Population Growth, to correct the percentages in the text and table, as follows (the changes do not affect the conclusions of the Draft SEIR):

Comparison of Growth in VMT with Growth in Population

Based on the transportation analysis, the service population (residents plus employees) of the area due to development proposed as part of the Transit District DTPP Amendments would increase by approximately ~~284~~ 856 percent, from the Existing scenario to 2040 with buildout of development allowed under the proposed Transit District DTPP Amendments, as shown in **Table 12-9**.

Draft SEIR, Chapter 12, *Air Quality*, Table 12-8, page 12-36, Item 1 under “Operational Emission Reductions,” Mitigation Measure AQ-2b is revised as follows to reflect revisions to Mitigation Measure CC-1:

1. As required by Mitigation Measure CC-1 (~~if feasible~~), projects ~~shall be constructed without natural gas infrastructure and shall be~~ comply with the “all electric.” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed.

Draft SEIR, Chapter 12, *Air Quality*, Table 12-8, page 12-33, the last partial paragraph (continuing onto page 12-34) is revised as follows to reflect revisions to Mitigation Measure CC-1:

The second major source of criteria pollutant emissions in land use development projects is energy use in buildings from the combustion of natural gas for space and water heating. However, consistent with the City’s Reach Codes, all newly constructed buildings would be required to be all-electric buildings. An all-electric building is a building that has no natural gas or propane plumbing installed within the building and that uses electricity as the source of energy for its space conditioning, water heating (including pools and spas), cooking appliances, and clothes drying appliances (City of Redwood City, 2020b). Exceptions may be granted to non-residential buildings containing kitchens and residential

buildings that contain only low-income units as long as the natural gas burning devices do not have a continuously burning pilot light. Other buildings eligible for exceptions include accessory dwelling units, non-residential buildings constructed to Office of Statewide Health Planning and Development Hospital standards, factories/industrial buildings, high-hazard buildings, and scientific laboratory areas. Implementation of Mitigation Measure CC-1 in the Climate Change section of this SEIR would require all future projects in the Plan-wide amendments area to comply with the “all electric” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed. ~~be all-electric and to be constructed without natural gas infrastructure.~~ This would ~~eliminate~~ substantially reduce direct air pollutant emissions from building energy use. ~~However, as explained in Chapter 13, Climate Change, implementation of Mitigation Measure CC-1 may not be feasible.~~

Chapter 13, Climate Change

Draft SEIR, Chapter 13, *Climate Change*, page 13-35, Mitigation Measure CC-1, and a portion of the subsequent text regarding Impact CC-1, is revised as follows:

Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2.

Subsequent development projects proposed as part of the Transit District DTPP Amendments shall ~~not be eligible for exceptions from~~ comply with the “all electric” requirement in the City’s Reach Codes in effect at the time that a building permit application is filed, and shall comply with EV requirements in the City’s Reach Codes or the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed, whichever is more restrictive. Subsequent development projects may qualify for exceptions to Reach Codes all-electric requirements.

Significance After Mitigation: With the implementation of Mitigation Measure CC-1, GHG emissions from all future projects proposed for development within the Transit District area would be reduced to the extent feasible, consistent with the BAAQMD’s adopted GHG significance thresholds. ~~Compliance with these thresholds would mean that these projects would not generate GHG emissions either directly or indirectly, that would have a significant impact on the environment.~~ However, as explained above, the City’s Reach Codes, adopted in September 2020, allow for certain exceptions to the no-natural gas requirement, including for affordable housing and commercial kitchens. ~~While Mitigation Measure CC-1 would disallow these exceptions within the Transit District area, this mitigation measure may not be feasible for economic or other reasons.~~ As detailed in the staff report for the September 14, 2020, City Council meeting, in order for local communities to adopt local amendments to state energy-related codes, “the additional requirements must be cost effective pursuant to [California] Public Resources Code 25402.”¹ The staff report explains that the California Energy Commission “considers an energy efficiency measure cost effective if the total utility savings over the estimated useful life of the energy efficiency measure exceeds the difference of costs between the measure and the base line measure of mixed-fuel energy usage. For example, requiring all-electric space conditioning in single-family homes would be considered cost

¹ This requirement is pursuant to Public Resources Code Section 25402.1(h)(2).

effective, if the total utility savings over 30 years exceeds the additional cost of the all-electric equipment when compared to the cost of a natural gas-powered space conditioner.”

In developing the Reach Codes, staff relied on widely cited studies conducted by Southern California Edison Company in coordination with PG&E, and conducted community and stakeholder outreach, and also considered Reach Codes adopted by other cities. In regard to commercial kitchens, the staff report explained that restaurant industry professionals had expressed concern about the current heat limitations of all-electric commercial cooking equipment and potential increased costs, particularly in light of the effect that the COVID-19 pandemic has had on the restaurant industry. Staff also noted that a number of other local cities have provided for similar exceptions. Regarding affordable housing, the staff report explained that funding sources for affordable housing developments—notably, tax credits—are subject to a maximum allowable cost per unit, meaning that added costs of electric space heating could render such projects ineligible for funding. Staff opined that this would encourage developers to exceed the City’s Affordable Housing Ordinance requirements and provide units at deeper affordability levels than they might otherwise. Staff also noted that this exception would not preclude fully electric affordable housing and that affordable housing developers would be encouraged to explore this possibility.

In summary, the City Council adopted the Redwood City Reach Codes as local policy following staff’s extensive outreach, consideration of other examples, and public input. ~~Because the Redwood City Reach Codes are less than two years old, and are, as such, a recently adopted statement of City policy, Therefore,~~ this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements. Accordingly, this impact is conservatively determined to be ***significant and unavoidable with mitigation***.

Draft SEIR, Chapter 13, *Climate Change*, page 13-36 the last paragraph is revised as follows to reflect revisions to Mitigation Measure CC-1:

The 2017 Scoping Plan Update adopted by CARB establishes the framework for achieving the 2030 statewide GHG reduction target of 40 percent below 1990 levels. The 2017 Scoping Plan Update includes local actions that land use development projects and municipalities can implement to support the statewide goal. The 2017 Scoping Plan Update also illustrates in Figure 5 that achieving the 2030 target is consistent with progress toward achieving the 2050 level included in EO S-3-05 and that depending on the success in achieving the 2030 target, it may be possible to achieve the 2050 target earlier than EO S-3-05 (CARB, 2017). The BAAQMD’s adopted project-level GHG CEQA thresholds are designed to demonstrate consistency with CARB’s 2017 Scoping Plan Update and the statewide goal of carbon neutrality by 2045 pursuant to EO B-55-13 for new projects and plans. As described under Impact CC-1, with the implementation of Mitigation Measure CC-1, the proposed Transit District Amendments would be reduced to the extent feasible, consistent with all four design elements included in BAAQMD’s adopted GHG thresholds. Therefore, implementation of the proposed Transit District Amendments would also be substantially consistent with the statewide emissions reduction goal for 2030 required by SB 32 and achieved through the 2017 Scoping Plan Update.

Draft SEIR, Chapter 13, *Climate Change*, page 13-38 the last full paragraph is revised as follows to reflect revisions to Mitigation Measure CC-1:

As shown above, the proposed Transit District Amendments would implement ~~all applicable~~ actions identified in the 2017 Scoping Plan Update to reduce energy use, conserve water, reduce waste generation, promote EV use, and reduce vehicle travel consistent with statewide strategies and regulations. In addition, as detailed under Impact CC-1, the proposed Transit District Amendments would be substantially consistent with the BAAQMD's adopted GHG significance thresholds which in turn mean that the proposed Transit District Amendments would be consistent with and contribute its fair share to the BAAQMD's GHG reductions required to meet the statewide GHG reduction goal for 2030 pursuant to SB 32 and the 2017 Scoping Plan Update.

Draft SEIR, Chapter 13, *Climate Change*, page 13-41, a portion of the text following Impact CC-2 is revised as follows to reflect revisions to Mitigation Measure CC-1:

Significance After Mitigation: With the implementation of Mitigation Measure CC-1, GHG emissions from all subsequent projects proposed for development within the Transit District area would be reduced to the extent feasible. ~~consistent with the BAAQMD's adopted GHG significance thresholds. Compliance with these thresholds would mean that these projects would not generate GHG emissions that would conflict with the State's GHG reduction goals or plans and policies in place to achieve these goals.~~ However, as explained above under Impact CC-1, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff's extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, Impact CC-1 is, conservatively considered to be ***significant and unavoidable with mitigation***.

Draft SEIR, Chapter 13, *Climate Change*, page 13-46, the analysis of Impact CC-4 in the first paragraph below the heading, "Project Impacts" is revised as follows to reflect revisions to Mitigation Measure CC-1:

Implementation of the proposed Transit District DTPP Amendments would encourage the development of new residential and office uses, and replace existing retail use. While construction activities associated with future developments would generate GHG emissions, all future developments would be consistent with the City's GHG reduction goals and ~~meet~~ would be substantially consistent with the BAAQMD's adopted thresholds for greenhouse gas emissions (BAAQMD, 2022). ~~These thresholds require project design elements to include~~ Subsequent development projects would use no natural gas in residential and non-residential buildings, except as permitted by the limited exceptions available under the City's Reach Codes, and provision of would provide EV charging infrastructure in compliance with the City's Reach Codes or CALGreen Tier 2 requirements, whichever is more restrictive. The VMT per capita associated with the proposed Transit District DTPP Amendments must also meet a 15 percent reduction below the regional average. With implementation of Mitigation Measure CC-1, the proposed Transit District DTPP Amendments would ~~meet all of these thresholds,~~

resulting in an increase in GHG emissions that is not cumulatively considerable, and thus would not exacerbate sea level rise. Also see Section 10, Utilities and Infrastructure, for an analysis of potential flood hazards, which would be less than significant. For these reasons, the proposed Transit District DTPP Amendments would not exacerbate effects of sea level rise and would not result in new or more severe impacts than what was identified in the DTPP Final EIR. Therefore, this impact would be less than significant, and no mitigation is required.

Chapter 17, Cumulative Impacts

Draft SEIR, Chapter 17, *Cumulative Impacts*, page 17-27, the first full paragraph is revised as follows to reflect revisions to Mitigation Measure CC-1:

Implementation of Mitigation Measure CC-1 would ensure substantial consistency with the state’s 2030 and 2045 GHG reduction goals. The project would also be consistent with applicable reduction plans and policies, and given that GHG emission impacts are cumulative in nature, the project’s incremental contribution to significant cumulative GHG emissions would be less than cumulatively considerable, and the proposed Transit District DTPP Amendments would not result in new or more severe cumulative impacts than were identified in the DTPP Final EIR and the cumulative impact would be ***significant and unavoidable with mitigation.***

Chapter 18, Other CEQA-Required Assessment Considerations

Draft SEIR, Chapter 18, *Other CEQA-Required Assessment Considerations*, page 18-2, the second paragraph under the heading, “18.2, Significant Unavoidable Impacts,” is revised as follows to correct an editorial error:

As discussed in Chapter 12, *Air Quality*, Chapter 13, *Climate Change*, and Chapter 17, *Cumulative Impacts*, the proposed project could result in the following significant unavoidable impacts related to air quality and greenhouse gas emissions.

Chapter 18, Other CEQA-Required Assessment Considerations

Draft SEIR, Chapter 18, *Other CEQA-Required Assessment Considerations*, page 18-4, the sixth paragraph, in regard to Impacts CC-1 and CC-2, is revised as follows to reflect revisions to Mitigation Measure CC-1:

Impacts CC-1 and CC-2 would be reduced to the extent feasible ~~a less-than-significant level~~ with implementation of Mitigation Measure CC-1. However, as explained in Chapter 13, *Climate Change*, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff’s extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-

electric requirements, and, as a result, Impacts CC-1 and CC-2 are conservatively considered to be significant and unavoidable.

Chapter 19, Alternatives to the Proposed Project

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, page 19-5, the final paragraph, concerning Impacts CC-1 and CC-2, is revised as follows to reflect revisions to Mitigation Measure CC-1:

Impacts CC-1 and CC-2 would be reduced to the extent feasible ~~a less-than-significant level~~ with implementation of Mitigation Measure CC-1. However, as explained in Chapter 13, *Climate Change*, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff's extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all- electric requirements, and, as a result, Impacts CC-1 and CC-2 are conservatively considered to be significant and unavoidable.

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, in response to Comment PH-Crnogorac-10 and Comment A-JPB-1, Draft SEIR Section 19-6, *Selection and Analysis of SEIR Alternatives*, page 19-8, is revised as follows:

19.6 Selection and Analysis of SEIR Alternatives

As described in this section, this SEIR analyzes a no project alternative and ~~two~~ three other alternatives to the proposed Transit District DTPP Amendments, and compares the impacts of those alternatives to each other and to the project.

In selecting alternatives for analysis in this chapter, the City of Redwood City considered: the project objectives and significant impacts identified above; the potential feasibility of alternatives based on factors in CEQA Guidelines Section 15126.6(f)(1); and whether the alternative would substantially reduce or eliminate environmental impacts of the projects, with a particular emphasis on significant and unavoidable impacts.

Consistent with these requirements, and CEQA's requirement for a No Project Alternative, this chapter describes the following alternatives:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Development Alternative
- Alternative 3: Altered Land Use Mix Alternative
- Alternative 4: Reduced Office Alternative

Table 19-2 compares the development program of the project and the alternatives, each of which is described further below.

TABLE 19-2
PROPOSED LAND USES IN DOWNTOWN PRECISE PLAN FOR THE PROPOSED TRANSIT
DISTRICT DTPP AMENDMENTS AND ALTERNATIVES

Land Use	Office Development Cap ^a	Residential Development Assumption ^a
Proposed Transit District DTPP Amendments	1,630,000 square feet	1,100 units
Reduced Development Alternative	1,100,000 square feet	750 units
Change from Project	-33%	-32%
Altered Land Use Mix Alternative	850,000 square feet	1,500 units
Change from Project	-48%	+36%
Change from Reduced Develop. Alt.	-23%	+100%
<u>Reduced Office Alternative</u>	<u>1,230,000 square feet</u>	<u>1,100 units</u>
<u>Change from Project</u>	<u>-25%</u>	<u>=</u>
<u>Change from Reduced Develop. Alt.</u>	<u>+12%</u>	<u>+47%</u>
<u>Change from Altered Land Use Mix Alternative</u>	<u>+45%</u>	<u>-27%</u>

NOTE:

^a All development totals represent net new development in the proposed Transit District DTPP Amendments.

SOURCE: City of Redwood City, 2022

* * * * *

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, the fourth and fifth sentences of footnote 2 on page 19-9 is revised as follows in light of the fact that the City's Housing Element Update is not anticipated to be approved until 2023:

However, as explained in Chapter 3, *Project Description*, the existing cap on residential development in the DTPP Transit District is proposed to be eliminated ~~by the City Council's adoption of a new Redwood City General Plan Housing Element in 2022~~, in compliance with the Housing Accountability Act. ~~Therefore, assuming this action is taken by the Council, residential development could be approved within the DTPP, including the area proposed as the Transit District, without any other DTPP or General Plan amendments.~~

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, in response to Comment PH-Crnogorac-10 and Comment A-JPB-1, Draft SEIR Section 19.6.1, *Identified Alternatives*, page 19-9, is revised as follows to add a new Reduced Office Alternative following the Altered Land Use Mix Alternative:

Reduced Office Alternative

Under the Reduced Office Alternative, a lesser amount of allowed office development would be assumed, compared to that with the proposed Transit District DTPP Amendments; however, the number of residential units would remain the same, at 1,100 units. Like the proposed project, this alternative would consist of amendments to

the City's General Plan and DTPP that would create a new sub-area, the Transit District area, within the DTPP area focused on transit-oriented development with approximately 16.6 acres of land located to the west of the Caltrain right-of-way. However, the Reduced Office Alternative would establish an office development cap for the Transit District area of 1.23 million square feet, about 75 percent of the office development cap proposed under the Transit District DTPP Amendments. Other aspects of the proposed Transit District DTPP Amendments, circulation improvements and changes to land use controls (development standards) related to, among other things, building design, building massing, circulation, and parking, would also be part of this alternative and would be the same as those with the proposed Transit District, or nearly so. Like the proposed Transit District DTPP Amendments, the Reduced Office Alternative would anticipate a relocated and enlarged Caltrain station and tracks as part of a new and relocated Transit Center.

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, in response to Comment PH-Crnogorac-10 and Comment A-JPB-1, Reduced Development Alternative, on pages 19-12 to 19-17; and Altered Land Use Mix Alternative, on pages 19-17 to 19-23, are revised to add quantitative comparisons of impacts, where applicable; a new Reduced Office Alternative is added following the Altered Land Use Mix Alternative; and Environmentally Superior Alternative, on pages 19-23 to 19-24, is updated, as follows:

Reduced Development Alternative

Under the Reduced Development Alternative, impacts related to the intensity of development—traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments.

Transportation

As explained in Chapter 9, *Transportation and Circulation*, all impacts of the proposed Transit District DTPP Amendments would be less than significant and no mitigation measures would be required. The proposed Transit District DTPP Amendments would be consistent with the General Plan transportation goals; would not conflict with any of the overarching transportation goals of the existing DTPP or RWCMoves; and would increase transit ridership, which would not result in a significant adverse effect on the environment. Because it would result in development of increased office and residential uses in proximity to a transit station and other comparable uses, the Reduced Development Alternative would likewise be consistent with the General Plan, DTPP, and RWCMoves, and would increase transit ridership, although by a lesser amount than would the proposed Transit District DTPP Amendments. Effects of the Reduced Development Alternative would be less than significant, as with the proposed Transit District DTPP Amendments.

~~The proposed Transit District DTPP Amendments would result in a less than significant impact with respect to VMT and, because it would result in development of increased~~

~~office and residential uses in proximity to a transit station and other comparable uses, the Reduced Development Alternative would likewise have a less than significant impact on VMT. The Reduced Development Alternative would result in approximately 22 percent fewer daily vehicle trips and a similar decrease in daily vehicle miles traveled (VMT), compared to the proposed Transit District DTPP Amendments. Additionally, as shown in Table 19-3, the Reduced Development Alternative would generate somewhat lesser VMT per resident and per employee than would the proposed Transit District DTPP~~

TABLE 19-3
VMT ANALYSIS RESULTS FOR REDUCED DEVELOPMENT ALTERNATIVE

<u>Scenario</u>	<u>VMT</u>	<u>VMT Threshold</u>	<u>Exceeds Threshold?</u>
<u>Residential Project Components</u>			
<u>Existing</u>	<u>0¹</u>	<u>10.5 VMT per capita</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>8.1</u>		<u>No</u>
<u>Reduced Development Alternative</u>	<u>7.8</u>		<u>No</u>
<u>Office (General Employment) Project Components</u>			
<u>Existing</u>	<u>14.3</u>	<u>15.0 VMT per employee</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>11.4</u>		<u>No</u>
<u>Reduced Development Alternative</u>	<u>11.1</u>		<u>No</u>

NOTES:

n/a = Existing VMT is not evaluated against threshold.

¹ The Transit District does not include any residential units under Existing and Cumulative No Project conditions.

SOURCE: Fehr & Peers, 2022.

Amendments. As with the proposed DTPP Amendments, both residential and office VMT would be below the City's VMT Thresholds. Accordingly, this ~~This~~ effect of the Reduced Development Alternative would be less than significant, as with the proposed Transit District DTPP Amendments.

The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to safety hazards and emergency access. Because it would develop the same land uses on the same or comparable sites—albeit at lesser intensity—as would the proposed Transit District DTPP Amendments, these impacts of the Reduced Development Alternative would be less than significant, as with the proposed Transit District DTPP Amendments.

Air Quality and Climate Change

Like the proposed Transit District DTPP Amendments, the Reduced Development Alternative would result in a lesser percentage increase in VMT than in service population. Therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. As ~~However, as~~ discussed in Chapter 12, *Air Quality*, and Chapter 17, *Cumulative Impacts*, and above, the

analysis in this SEIR conservatively concludes that the proposed Transit District DTPP Amendments could result in a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impacts AQ-2 and C-AQ-1). This is because the BAAQMD thresholds of significance with respect to criteria air pollutants for revisions to a plan (consistency with current air quality plan control measures, and projected VMT or vehicle trip increase is less than or equal to projected population increase) differ from the criteria pollutants thresholds of significance for individual projects, which are based on comparison to specific quantities of daily and annual project emissions. Implementation of Mitigation Measures AQ-2a and AQ-2b would reduce the impact, but it cannot be stated with certainty that impacts from all subsequent development projects would be less than significant, even with mitigation.

Because the Reduced Development Alternative would develop the same office and residential land uses at a lesser intensity than would the proposed Transit District DTPP Amendments, it would be less likely that one or more individual projects could exceed the BAAQMD screening thresholds; however, it cannot be stated with certainty that, under this alternative, impacts from all subsequent development projects would be less than significant, even with mitigation. Therefore, this SEIR conservatively concludes that the Reduced Development Alternative, like the proposed Transit District DTPP Amendments, would have a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s). The foregoing conclusion would also apply to the cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impact C-AQ-1): this impact would be significant and unavoidable for the Reduced Development Alternative, as it would be for the proposed Transit District DTPP Amendments.

Other air quality impacts of the proposed Transit District DTPP Amendments would be less than significant, in some cases with mitigation. The proposed Transit District DTPP Amendments would have a less-than-significant impact with respect to compliance with BAAQMD's *2017 Clean Air Plan*, with which the proposed Transit District DTPP Amendments would be consistent. Because it would develop the same office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, albeit at a reduced intensity, as would the proposed Transit District DTPP Amendments, the Reduced Development Alternative would likewise be consistent with the applicable clean air plan and would have a less-than-significant impact.

Given its lesser increase in VMT than in service population, at a plan level, the proposed Transit District DTPP Amendments would have a less-than-significant impact with respect to its 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. ~~The~~ As shown in Table 19-3, the Reduced Development Alternative, which would similarly develop office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, albeit at a reduced

intensity, would result in somewhat lesser VMT per person and per employee than would the proposed Transit District DTPP Amendments. Accordingly, this alternative, too, would have a less-than-significant impact.

The proposed Transit District DTPP Amendments would have a potentially significant impact with respect to health risks because subsequent development projects could generate substantial volumes of toxic air contaminants during construction. However, with implementation of Mitigation Measure AQ-3: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction, this impact would be reduced to a less-than-significant level. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser, significant health risk impact as would the proposed Transit District DTPP Amendments. However, this impact, too, would be reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3.

Subsequent development in the proposed Transit District DTPP Amendments would not include any major sources of odor, and therefore odor impacts would be less than significant. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative would likewise have less-than-significant odor impacts.

As discussed in Chapter 13, *Climate Change*, absent mitigation, the proposed Transit District DTPP Amendments could result in significant impacts on climate change because the City's Reach Codes allow waivers to its requirement for all-electric buildings (i.e., no natural gas). The Reach Codes also do not ensure compliance with future updates to the CALGreen Tier 2 EV requirements. Therefore, the proposed Transit District DTPP Amendments would not comply with BAAQMD's adopted GHG threshold and could conflict with the GHG reduction targets established by Executive Order S-3-05 and SB 32, the reduction measures identified in CARB's 2017 Scoping Plan, and Plan Bay Area and the Redwood City Climate Action Plan. These impacts would be reduced to the extent feasible ~~a less-than-significant level~~ with Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2. Inasmuch as climate change impacts are by their nature cumulative, the proposed Transit District DTPP Amendments would likewise have potentially significant cumulative climate change impacts that would be reduced to the extent feasible ~~a less-than-significant level~~ with Mitigation Measure CC-1. However, as also explained in Chapter 13, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff's extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, Impacts CC-1 and CC-2 are conservatively considered to be significant and unavoidable.

With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative's cumulative climate change impacts, would be reduced to the extent feasible a less-than-significant level with Mitigation Measure CC-1. Nevertheless, as stated in the preceding paragraph, full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, impacts of the Reduced Development Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

Noise and Vibration

As discussed in Chapter 11, *Noise and Vibration*, the proposed Transit District DTPP Amendments could potentially result in a significant impact related to temporary construction noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1: Construction Noise Reduction. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser, construction noise impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1.

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to permanent increases in building equipment noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2: Operational Noise Performance Standard. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser, building equipment noise impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments, the Reduced Development Alternative would result in less-than-significant traffic noise impacts because traffic volumes would increase by a lesser amount than would trigger an impact; this less-than-significant impact would be somewhat less substantial with the Reduced Development Alternative, compared to the proposed Transit District DTPP Amendments, because of this alternative's lesser traffic volumes (approximately 22 percent fewer daily vehicle trips than with the proposed Transit District DTPP Amendments).

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to groundborne vibration from construction of subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3: Vibration Reduction. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser,

construction- generated vibration impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3.

Effects related to airport noise would be less than significant with the Reduced Development Alternative, as would be the case for the proposed Transit District DTPP Amendments because the 60, 65, 70, and 75 CNEL noise contours for San Carlos Airport do not extend into the City of Redwood City.

Population and Housing

As discussed in Chapter 5, *Population and Housing*, the proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to population and housing because it would not induce substantial unplanned growth and would not result in residential displacement. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative would likewise have less-than-significant impacts with respect to population and housing. Because it would reduce office space, and therefore employment, by essentially the same amount as the number of residential units, and therefore employed residents, the Reduced Development Alternative would result in 4.3 jobs per employed resident in the Transit District area, similar to the ratio of 4.4 for the proposed Transit District DTPP Amendments.

Public Services and Utilities and Infrastructure

As discussed in Chapter 8, *Public Services and Recreation*, the proposed Transit District DTPP Amendments would have less-than-significant effects with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries). With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative would likewise have less-than-significant impacts with respect to public services.

As discussed in Chapter 10, *Utilities and Infrastructure*, the proposed Transit District DTPP Amendments would have less-than-significant effects with mitigation with respect to water supply. The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to the construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities; wastewater treatment capacity; and solid waste. The proposed Transit District DTPP Amendments would also have less-than-significant impacts with respect to water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative would likewise have less-than-significant impacts with respect to utilities and infrastructure (including hydrology and water quality). In particular, annual water demand would be reduced by approximately 38 percent, compared to that with the proposed Transit District DTPP Amendments.

Other Impacts

Effects related to the footprint of subsequent development projects would generally be the same as or similar to those of the proposed Transit District ~~area~~ ~~DTPP Amendments~~. This is because the locations of subsequent development projects would not necessarily change, although lesser overall development would occur within the proposed Transit District DTPP Amendments. That is, it is possible that the existing Sequoia Station shopping center would be redeveloped under this alternative, albeit with lesser intensity of new construction and either shorter buildings or buildings with less bulk, or both. Likewise, the existing Redwood City Transit Center site could also be redeveloped if the Caltrain station and transit center were to be relocated and expanded, but again with lesser intensity of new development. Because any change in the footprint of subsequent development projects, if any, cannot be known at this time, it is assumed that excavation could potentially disturb archaeological or tribal cultural resources, potentially result in exposure of workers or the public to subsurface soil or groundwater contamination, and potentially disturb paleontological resources to the same or a similar degree as would be the case with the proposed Transit District DTPP Amendments. Likewise, building demolition could adversely affect historical resources to the same or a similar degree as with the proposed Transit District DTPP Amendments. Additionally, the Reduced Development Alternative could result in the same or similar disturbance of nesting birds and removal of trees that could result from construction of subsequent development projects in the Transit District area. Finally, this alternative could, like the proposed Transit District DTPP Amendments, result in the same or similar development on potentially expansive or corrosive soils. Each of these impacts—Impact CR-1, CR-2, CR-4, HAZ-6, BIO-4, BIO-5, GEO-4, and GEO-6—would be less than significant with mitigation under the Reduced Development, as would be the case with the proposed Transit District DTPP Amendments.

As with the proposed Transit District DTPP Amendments, effects of the Reduced Development Alternative would be less than significant with respect to land use and aesthetics (including shadow), because the same office and residential uses would be developed in at least some of the same locations as with the Transit District area, although at lesser intensity. However, one or more subsequent individual development project(s) could be the same as, or similar to, individual development project(s) that could be developed pursuant to the proposed Transit District DTPP Amendments.

Conclusion

The Reduced Development Alternative would not necessarily avoid the proposed Transit District DTPP Amendments' potentially significant and unavoidable effect of subsequent individual development projects with respect to emissions of criteria air pollutants (Impact AQ-2) because, like the proposed Transit District DTPP Amendments, it could lead to one or more subsequent development projects that would exceed the BAAQMD project-specific thresholds of significance for criteria air pollutants. As noted above, however, at this time, the severity of this impact cannot be accurately known, pending analysis of a specific project and application of project-specific mitigation measures, and therefore this impact is conservatively assumed to be significant and unavoidable. The

Reduced Development Alternative likewise would not avoid the proposed Transit District DTPP Amendments' potentially significant and unavoidable effect with respect to climate change (Impact CC-1) because, like the project and the other alternatives, development would be subject to the City's Reach Codes with respect to limited exceptions to allow use of natural gas, and would therefore not fully comply with BAAQMD's adopted GHG threshold.

The Reduced Development Alternative would address each of the City's objectives for the proposed project, but to a lesser degree than would the proposed Transit District DTPP Amendments.

Altered Land Use Mix Alternative

Under the Altered Land Use Mix ~~Reduced Development~~ Alternative, impacts related to the intensity of development—traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments.

Transportation

As explained in Chapter 9, *Transportation and Circulation*, all impacts of the proposed Transit District DTPP Amendments would be less than significant and no mitigation measures would be required. The proposed Transit District DTPP Amendments would be consistent with the General Plan transportation goals; would not conflict with any of the overarching transportation goals of the existing DTPP or RWCMoves; and would increase transit ridership, which would not result in a significant adverse effect on the environment. Because it would result in an increase, compared to existing conditions, of office and residential uses in proximity to a transit station and other comparable uses, the Altered Land Use Mix Alternative would likewise be consistent with the General Plan, DTPP, and RWCMoves, and would increase transit ridership, although by a lesser amount than would the proposed Transit District. Effects of the Altered Land Use Mix Alternative would be less than significant, as with the proposed Transit District DTPP Amendments and the Reduced Development Alternative.

~~The proposed Transit District DTPP Amendments would result in a less than significant impact with respect to VMT and, because it would result in an increase, compared to existing conditions, of office and residential uses in proximity to a transit station and other comparable uses, the Altered Land Use Mix Alternative would likewise have a less than significant impact on VMT.~~ The Altered Land Use Mix Alternative would result in approximately 20 percent fewer daily vehicle trips and 25 percent fewer daily vehicle miles traveled (VMT), compared to the proposed Transit District DTPP Amendments. (This alternative would generate about 3 percent more daily vehicle trips and about 2 percent less VMT than would the Reduced Development Alternative.) Additionally, as shown in Table 19-4, the Altered Land Use Mix Alternative would generate somewhat

greater VMT per resident but somewhat lesser VMT per employee than would the proposed Transit District DTPP Amendments. (The marginal increase in residential VMT is likely the result of the fact that residential vehicle travel demand is generally less sensitive to proximity to transit than is non-residential demand.) Although residential VMT would be slightly greater than with the proposed Transit District DTPP Amendments, both residential and office VMT would be below the City's VMT Thresholds, as would be the case for the proposed Transit District DTPP Amendments. Accordingly, this effect of the Altered Land Use Mix Alternative would be less than significant, as with the proposed Transit District DTPP Amendments and the Reduced Development Alternative.

TABLE 19-4
VMT ANALYSIS RESULTS FOR ALTERED LAND USE MIX ALTERNATIVE

<u>Scenario</u>	<u>VMT</u>	<u>VMT Threshold</u>	<u>Exceeds Threshold?</u>
<u>Residential Project Components</u>			
<u>Existing</u>	<u>0¹</u>	<u>10.5 VMT per capita</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>8.1</u>		<u>No</u>
<u>Altered Land Use Mix Alternative</u>	<u>8.4</u>		<u>No</u>
<u>Office (General Employment) Project Components</u>			
<u>Existing</u>	<u>14.3</u>	<u>15.0 VMT per employee</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>11.4</u>		<u>No</u>
<u>Altered Land Use Mix Alternative</u>	<u>11.2</u>		<u>No</u>

NOTES:

n/a = Existing VMT is not evaluated against threshold.

¹ The Transit District does not include any residential units under Existing and Cumulative No Project conditions.

SOURCE: Fehr & Peers, 2022.

The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to safety hazards and emergency access. Because it would develop the same land uses on the same or comparable sites—albeit at lesser intensity—as would the proposed Transit District DTPP Amendments, these impacts of the Altered Land Use Mix Alternative would be less than significant, as with the proposed Transit District DTPP Amendments and the Reduced Development Alternative.

Air Quality and Climate Change

Like the proposed Transit District DTPP Amendments, the Altered Land Use Mix Alternative would result in a lesser percentage increase in VMT than in service population. Therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. As However, as discussed in Chapter 12, *Air Quality*, and Chapter 17, *Cumulative Impacts*, and above, the analysis in this SEIR conservatively concludes that the proposed Transit District DTPP

Amendments could result in a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impacts AQ-2 and C-AQ-1). This is because the BAAQMD thresholds of significance with respect to criteria air pollutants for revisions to a plan (consistency with current air quality plan control measures, and projected VMT or vehicle trip increase is less than or equal to projected population increase) differ from the criteria pollutants thresholds of significance for individual projects, which are based on comparison to specific quantities of daily and annual project emissions. Implementation of Mitigation Measures AQ-2a and AQ-2b would reduce the impact, but it cannot be stated with certainty that impacts from all subsequent development projects would be less than significant, even with mitigation.

Because the Altered Land Use Mix Alternative would develop just over half of the office space but more than 35 percent of the residential units, and about 15 percent less total floor area than would the proposed Transit District DTPP Amendments, it could be slightly less likely that one or more individual projects could exceed the BAAQMD screening thresholds; however, as with the Reduced Development Alternative, it cannot be stated with certainty that, under the Altered Land Use Mix Alternative, impacts from all subsequent development projects would be less than significant, even with mitigation. Therefore, this SEIR conservatively concludes that the Altered Land Use Mix Alternative, like the proposed Transit District DTPP Amendments, would have a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s). The foregoing conclusion would also apply to the cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impact C-AQ-1): this impact would be significant and unavoidable for the Altered Land Use Mix Alternative, as it would be for the proposed Transit District DTPP Amendments and the Reduced Development Alternative.

Other air quality impacts of the proposed Transit District DTPP Amendments would be less than significant, in some cases with mitigation. The proposed Transit District DTPP Amendments would have a less-than-significant impact with respect to compliance with BAAQMD's *2017 Clean Air Plan*, with which the proposed Transit District DTPP Amendments would be consistent. Because it would develop the office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, albeit at a reduced overall intensity (considerably less office space but somewhat more residential development, with about 15 percent less total square footage), as would the proposed Transit District DTPP Amendments and the Reduced Development Alternative, the Altered Land Use Mix Alternative would likewise be consistent with the applicable clean air plan and would have a less-than-significant impact.

Given its lesser increase in VMT than in service population, at a plan level, the proposed Transit District DTPP Amendments would have a less-than-significant impact with respect to its 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. ~~The~~ As shown in Table 19-4, the Altered Land Use Mix Alternative, which would similarly develop office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, albeit at a reduced overall intensity, would result in somewhat greater VMT per resident but somewhat lesser VMT per employee than would the proposed Transit District DTPP Amendments. Inasmuch as both residential and office VMT would be below the City's VMT Thresholds, this alternative would likewise have a less-than-significant impact, as would the proposed Transit District DTPP Amendments and ~~similar to~~ the Reduced Development Alternative.

The proposed Transit District DTPP Amendments would have a potentially significant impact with respect to health risks because subsequent development projects could generate substantial volumes of toxic air contaminants during construction. However, with implementation of Mitigation Measure AQ-3: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction, this impact would be reduced to a less-than-significant level. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative could result in similar, albeit slightly lesser, significant health risk impact as would the proposed Transit District DTPP Amendments, because the overall square footage would be reduced by about 15 percent. However, as with the proposed Transit District DTPP Amendments and the Reduced Development Alternative this impact, too, would be reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3.

Subsequent development proposed under the Transit District DTPP Amendments would not include any major sources of odor, and therefore odor impacts would be less than significant. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative, like the proposed Transit District DTPP Amendments and the Reduced Development Alternative, would likewise have less-than-significant odor impacts.

As discussed in Chapter 13, *Climate Change*, absent mitigation, the proposed Transit District DTPP Amendments could result in significant impacts on climate change because the City's Reach Codes allows waivers to its requirement for all-electric buildings (i.e., no natural gas). The Reach Codes also do not ensure compliance with future updates to the CALGreen Tier 2 EV requirements. Therefore, the proposed Transit District DTPP Amendments would not comply with BAAQMD's adopted GHG threshold and could conflict with the GHG reduction targets established by Executive Order S-3-05 and SB 32, the reduction measures identified in CARB's 2017 Scoping Plan, and Plan Bay Area and the Redwood City Climate Action Plan. These impacts would be reduced to the extent feasible ~~a less-than-significant level~~ with Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2. Inasmuch as climate change impacts are by their nature cumulative, the proposed Transit District DTPP Amendments would likewise have

potentially significant cumulative climate change impacts that would be reduced to the extent feasible ~~a less-than-significant level~~ with Mitigation Measure CC-1. However, as also explained in Chapter 13, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff's extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, Impacts CC-1 and CC-2 are conservatively considered to be significant and unavoidable.

With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Development Alternative could result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative's cumulative climate change impacts, would be reduced to the extent feasible ~~a less-than-significant level~~ with Mitigation Measure CC-1. Nevertheless, as stated in the preceding paragraph, full implementation of Mitigation Measure CC-1 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, impacts of the Reduced Development Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

Noise and Vibration

As discussed in Chapter 11, *Noise and Vibration*, the proposed Transit District DTPP Amendments could potentially result in a significant impact related to temporary construction noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1: Construction Noise Reduction. With the same land uses at a reduced overall intensity of development (about 15 percent less total square footage) in at least some of the same locations, the Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, construction noise impacts to those of the proposed Transit District DTPP Amendments and the Reduced Development Alternative. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1.

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to permanent increases in building equipment noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2: Operational Noise Performance Standard. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, building equipment noise impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments and the Reduced Development Alternative, the Altered Land Use Mix Alternative would result in less-

than-significant traffic noise impacts because traffic volumes would increase by a lesser amount than would trigger an impact; this less-than-significant impact would be somewhat less substantial with the Altered Land Use Mix Alternative, compared to the Transit District DTPP Amendments, because of this alternative's lesser traffic volumes (approximately 20 percent fewer daily vehicle trips than with the proposed Transit District DTPP Amendments, but about 3 percent more trips than with the Reduced Development Alternative).

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to groundborne vibration from construction of subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3: Vibration Reduction. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative could result in similar, albeit somewhat lesser, construction-generated vibration impacts than those of the proposed Transit District DTPP Amendments and the Reduced Development Alternative. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3.

Effects related to airport noise would be less than significant with the Altered Land Use Mix Alternative, as would be the case for the proposed Transit District DTPP Amendments and the Reduced Development Alternative because the 60, 65, 70, and 75 CNEL noise contours for San Carlos Airport do not extend into the City of Redwood City.

Population and Housing

As discussed in Chapter 5, *Population and Housing*, the proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to population and housing because it would not induce substantial unplanned growth and would not result in residential displacement. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative, like the Reduced Development Alternative, would likewise have less-than-significant impacts with respect to population and housing.

Public Services and Utilities and Infrastructure

As discussed in Chapter 8, *Public Services and Recreation*, the proposed Transit District DTPP Amendments would have less-than-significant effects with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries). With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative, like the Reduced Development Alternative, would likewise have less-than-significant impacts with respect to public services. Because it would reduce office space, and therefore employment, by nearly half, compared to the proposed Transit District DTPP Amendments, while increasing the number of residential units, and therefore employed residents, by 36 percent, the Altered Land Use Mix Alternative would result in 1.7 jobs per employed

resident in the Transit District area, less than half of the ratio of 4.4 for the proposed Transit District DTPP Amendments.

As discussed in Chapter 10, *Utilities and Infrastructure*, the proposed Transit District DTPP Amendments would have less-than-significant effects with mitigation with respect to water supply. The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to the construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities; wastewater treatment capacity; and solid waste. The proposed Transit District DTPP Amendments would also have less-than-significant impacts with respect to water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan. With the same land uses at a reduced overall intensity in at least some of the same locations, the Altered Land Use Mix Alternative, like the Reduced Development Alternative, would likewise have less-than-significant impacts with respect to utilities and infrastructure (including hydrology and water quality). In particular, annual water demand would be reduced by approximately 10 percent, compared to that with the proposed Transit District DTPP Amendments, although water demand would be about 45 percent greater than with the Reduced Development Alternative, because residential use is generally more water-intensive than most non-residential uses.

Other Impacts

Effects related to the footprint of subsequent development projects would generally be the same as or similar to those of the proposed Transit District DTPP Amendments and of the Reduced Development Alternative. This is because the locations of subsequent development projects would not necessarily change, although lesser overall development would occur within the Transit District area. That is, it is possible that the existing Sequoia Station shopping center would be redeveloped under this alternative, albeit with lesser intensity of new construction and either shorter buildings or buildings with less bulk, or both. Likewise, the existing Redwood City Transit Center site could also be redeveloped if the Caltrain station and transit center were to be relocated and expanded, but again with lesser intensity of new development. Because any change in the footprint of subsequent development projects, if any, cannot be known at this time, it is assumed that excavation could potentially disturb archaeological or tribal cultural resources, potentially result in exposure of workers or the public to subsurface soil or groundwater contamination, and potentially disturb paleontological resources to the same or a similar degree as would be the case with the proposed Transit District DTPP Amendments and the Reduced Development Alternative. Likewise, building demolition could adversely affect historical resources to the same or a similar degree as with the proposed Transit District DTPP Amendments. Additionally, the Altered Land Use Mix Alternative, like the Reduced Development Alternative, could result in the same or similar disturbance of nesting birds and removal of trees that could result from construction of subsequent development projects in the Transit District area. Finally, this alternative could, like the proposed Transit District DTPP Amendments and the Reduced Development Alternative, result in the same or similar

development on potentially expansive or corrosive soils. Each of these impacts—Impact CR-1, CR-2, CR-4, HAZ-6, BIO-4, BIO-5, GEO-4, and GEO-6—would be less than significant with mitigation under the Altered Land Use Mix Alternative, as would be the case with the proposed Transit District DTPP Amendments.

As with the proposed Transit District DTPP Amendments, effects of the Altered Land Use Mix Alternative would be less than significant with respect to land use and aesthetics (including shadow), because the same office and residential uses would be developed in at least some of the same locations as with the proposed Transit District DTPP Amendments, although at lesser intensity. However, one or more subsequent individual development project(s) could be the same as, or similar to, individual development project(s) that could be developed pursuant to the proposed Transit District DTPP Amendments.

Conclusion

The Altered Land Use Mix Alternative would not necessarily avoid the proposed Transit District DTPP Amendments' potentially significant and unavoidable effect of subsequent individual development projects with respect to emissions of criteria air pollutants (Impact AQ-2) because, like the proposed Transit District DTPP Amendments, it could lead to one or more subsequent development projects that would exceed the BAAQMD project-specific thresholds of significance for criteria air pollutants. As noted above, however, at this time, the severity of this impact cannot be accurately known, pending analysis of a specific project and application of project-specific mitigation measures, and therefore this impact is conservatively assumed to be significant and unavoidable. The Reduced Altered Land Use Mix Alternative likewise would not avoid the proposed Transit District DTPP Amendments' potentially significant and unavoidable effect with respect to climate change (Impact CC-1) because, like the project and the other alternatives, development would be subject to the City's reach Codes with respect to limited exceptions to allow use of natural gas, and would therefore not fully comply with BAAQMD's adopted GHG threshold.

The Altered Land Use Mix Alternative would address each of the City's objectives for the proposed project, but to a lesser degree than would the proposed Transit District DTPP Amendments.

Reduced Office Alternative

Under the Reduced Office Alternative, impacts related to the intensity of development—traffic (including traffic that might potentially interfere with emergency evacuation plans); criteria air pollutant, toxic air contaminant, and greenhouse gas emissions; noise and vibration; population or employment; and demand for public services and utilities—would generally be reduced, compared to those of the proposed Transit District DTPP Amendments.

Transportation

As explained in Chapter 9, *Transportation and Circulation*, all impacts of the proposed Transit District DTPP Amendments would be less than significant and no mitigation measures would be required. The proposed Transit District DTPP Amendments would be consistent with the General Plan transportation goals; would not conflict with any of the overarching transportation goals of the existing DTPP or RWCMoves; and would increase transit ridership, which would not result in a significant adverse effect on the environment. Because it would result in development of increased office and residential uses in proximity to a transit station and other comparable uses, the Reduced Office Alternative would likewise be consistent with the General Plan, DTPP, and RWCMoves, and would increase transit ridership, although by a lesser amount than would the proposed Transit District DTPP Amendments. Effects of the Reduced Office Alternative would be less than significant, as with the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative.

The Reduced Office Alternative would result in approximately 15 percent fewer daily vehicle trips and a 16 percent reduction in daily vehicle miles traveled (VMT), compared to the proposed Transit District DTPP Amendments. Additionally, as shown in Table 19-5, the Reduced Office Alternative would generate incrementally greater VMT per resident but incrementally lesser VMT per employee than would the proposed Transit District DTPP Amendments. As with the proposed DTPP Amendments, both residential and office VMT would be below the City's VMT Thresholds. Accordingly, this effect of the Reduced Office Alternative would be less than significant, as with the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative.

TABLE 19-5
VMT ANALYSIS RESULTS FOR REDUCED OFFICE ALTERNATIVE

<u>Scenario</u>	<u>VMT</u>	<u>VMT Threshold</u>	<u>Exceeds Threshold?</u>
<u>Residential Project Components</u>			
<u>Existing</u>	<u>0¹</u>	<u>10.5 VMT per capita</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>8.1</u>		<u>No</u>
<u>Reduced Office Alternative</u>	<u>8.2</u>		<u>No</u>
<u>Office (General Employment) Project Components</u>			
<u>Existing</u>	<u>14.3</u>	<u>15.0 VMT per employee</u>	<u>n/a</u>
<u>Proposed Project</u>	<u>11.4</u>		<u>No</u>
<u>Reduced Office Alternative</u>	<u>11.1</u>		<u>No</u>

NOTES:

n/a = Existing VMT is not evaluated against threshold.

¹ The Transit District does not include any residential units under Existing and Cumulative No Project conditions.

SOURCE: Fehr & Peers. 2022.

The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to safety hazards and emergency access. Because it would develop the same land uses on the same or comparable sites—albeit at lesser intensity—as would the proposed Transit District DTPP Amendments, these impacts of the Reduced Office Alternative would be less than significant, as with the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative.

Air Quality and Climate Change

Like the proposed Transit District DTPP Amendments, the Reduced Office Alternative would result in a lesser percentage increase in VMT than in service population. Therefore, this alternative would not conflict with or obstruct implementation of the applicable air quality plan, and the Plan-level impact would be less than significant, as with the proposed Transit District DTPP Amendments. However, as discussed in Chapter 12, *Air Quality*, and Chapter 17, *Cumulative Impacts*, and above, the analysis in this SEIR conservatively concludes that the proposed Transit District DTPP Amendments could result in a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impacts AQ-2 and C-AQ-1). This is because the BAAQMD thresholds of significance with respect to criteria air pollutants for revisions to a plan (consistency with current air quality plan control measures, and projected VMT or vehicle trip increase is less than or equal to projected population increase) differ from the criteria pollutants thresholds of significance for individual projects, which are based on comparison to specific quantities of daily and annual project emissions. Implementation of Mitigation Measures AQ-2a and AQ-2b would reduce the impact, but it cannot be stated with certainty that impacts from all subsequent development projects would be less than significant, even with mitigation.

Because the Reduced Office Alternative would develop the same office use at a lesser intensity than, and the same residential use as, the proposed Transit District DTPP Amendments, it would be somewhat less likely that one or more individual projects could exceed the BAAQMD screening thresholds; however, it cannot be stated with certainty that, under this alternative, impacts from all subsequent development projects would be less than significant, even with mitigation. Therefore, this SEIR conservatively concludes that the Reduced Office Alternative, like the proposed Transit District DTPP Amendments, would have a significant unavoidable impact with respect to emissions of criteria air pollutants from individual subsequent development project(s). The foregoing conclusion would also apply to the cumulative impact with respect to emissions of criteria air pollutants from individual subsequent development project(s) (Impact C-AQ-1); this impact would be significant and unavoidable for the Reduced Office Alternative, as it would be for the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative.

Other air quality impacts of the proposed Transit District DTPP Amendments would be less than significant, in some cases with mitigation. The proposed Transit District DTPP

Amendments would have a less-than-significant impact with respect to compliance with BAAQMD's 2017 Clean Air Plan, with which the proposed Transit District DTPP Amendments would be consistent. Because it would develop the same office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, although with office development at a reduced intensity, as would the proposed Transit District DTPP Amendments, the Reduced Office Alternative would likewise be consistent with the applicable clean air plan and would have a less-than-significant impact.

Given its lesser increase in VMT than in service population, at a plan level, the proposed Transit District DTPP Amendments would have a less-than-significant impact with respect to its 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. As shown in Table 19-5, the Reduced Office Alternative, which would similarly develop office and residential uses in proximity to a transit station and other comparable uses in at least some of the same locations, albeit at a reduced intensity, would result in somewhat lesser VMT per person and per employee than would the proposed Transit District DTPP Amendments. Accordingly, this alternative, too, would have a less-than-significant impact, as would the Reduced Development Alternative and the Altered Land Use Mix Alternative.

The proposed Transit District DTPP Amendments would have a potentially significant impact with respect to health risks because subsequent development projects could generate substantial volumes of toxic air contaminants during construction. However, with implementation of Mitigation Measure AQ-3: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction, this impact would be reduced to a less-than-significant level. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative could result in similar, albeit somewhat lesser, significant health risk impact as would the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative. However, this impact, too, would be reduced to a less-than-significant level with implementation of Mitigation Measure AQ-3.

Subsequent development in the proposed Transit District DTPP Amendments would not include any major sources of odor, and therefore odor impacts would be less than significant. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative would likewise have less-than-significant odor impacts.

As discussed in Chapter 13, *Climate Change*, absent mitigation, the proposed Transit District DTPP Amendments could result in significant impacts on climate change because the City's Reach Codes allow waivers to its requirement for all-electric buildings (i.e., no natural gas). The Reach Codes also do not ensure compliance with future updates to the CALGreen Tier 2 EV requirements. Therefore, the proposed Transit District DTPP

Amendments would not comply with BAAQMD’s adopted GHG threshold and could conflict with the GHG reduction targets established by Executive Order S-3-05 and SB 32, the reduction measures identified in CARB’s 2017 Scoping Plan, and Plan Bay Area and the Redwood City Climate Action Plan. These impacts would be reduced to the extent feasible with Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2. Inasmuch as climate change impacts are by their nature cumulative, the proposed Transit District DTPP Amendments would likewise have potentially significant cumulative climate change impacts that would be reduced to the extent feasible with Mitigation Measure CC-1. However, as also explained in Chapter 13, the City Council in 2020 adopted the Redwood City Reach Codes, which permit certain exceptions to prohibitions on the use of natural gas, as local policy following staff’s extensive outreach, consideration of other examples, and public input. Therefore, this SEIR considers that the full implementation of Mitigation Measures CC-1 and CC-2 may not be feasible because projects may qualify for exceptions to the all-electric requirements and, as a result, Impacts CC-1 and CC-2 are conservatively considered to be significant and unavoidable.

With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative could result in similar, albeit somewhat lesser, significant climate change impacts as the proposed Transit District DTPP Amendments. However, as with the proposed Transit District DTPP Amendments, these impacts, as well as this alternative’s cumulative climate change impacts, would be reduced to the extent feasible with Mitigation Measure CC-1. Nevertheless, as stated in the preceding paragraph, this SEIR considers that the full implementation of Mitigation Measures CC-1 and CC-2 may not be feasible because projects may qualify for exceptions to the all-electric requirements, and, as a result, impacts of the Reduced Office Alternative with respect to climate change are likewise conservatively considered to be significant and unavoidable.

Noise and Vibration

As discussed in Chapter 11, *Noise and Vibration*, the proposed Transit District DTPP Amendments could potentially result in a significant impact related to temporary construction noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1: Construction Noise Reduction. With the same land uses in at least some of the same locations—and with office floor area reduced by 25 percent, compared to the proposed Transit District DTPP Amendments but the same overall floor area as the Altered Land Use Mix Alternative—the Reduced Office Alternative could result in similar, but somewhat lesser, construction noise impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-1.

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to permanent increases in building equipment noise from subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2: Operational

Noise Performance Standard. With the same land uses at a reduced overall intensity in at least some of the same locations, the Reduced Office Alternative could result in similar, albeit somewhat lesser, building equipment noise impacts. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-2. Like the proposed Transit District DTPP Amendments and the two other build alternatives (Reduced Development and Altered Land Use Mix), the Reduced Office Alternative would result in less-than-significant traffic noise impacts because traffic volumes would increase by a lesser amount than would trigger an impact; this less-than-significant impact would be somewhat less substantial with the Reduced Office Alternative, compared to the proposed Transit District DTPP Amendments, because of this alternative's lesser traffic volumes (approximately 15 percent fewer daily vehicle trips than with the proposed Transit District DTPP Amendments).

The proposed Transit District DTPP Amendments could potentially result in a significant impact related to groundborne vibration from construction of subsequent individual development project(s). However, this impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3: Vibration Reduction. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative could result in similar, albeit somewhat lesser, construction-generated vibration impacts than those of the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative. These impacts would likewise be mitigated to a less-than-significant level with implementation of Mitigation Measure NO-3.

Effects related to airport noise would be less than significant with the Reduced Office Alternative, as would be the case for the proposed Transit District DTPP Amendments because the 60, 65, 70, and 75 CNEL noise contours for San Carlos Airport do not extend into the City of Redwood City.

Population and Housing

As discussed in Chapter 5, *Population and Housing*, the proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to population and housing because they would not induce substantial unplanned growth and would not result in residential displacement. With the same land uses, and with reduced office development intensity and the same residential development in at least some of the same locations, the Reduced Office Alternative, like the Reduced Development Alternative and the Altered Land Use Mix Alternative, would likewise have less-than-significant impacts with respect to population and housing. Because it would reduce office space, and therefore employment, by one-fourth, compared to the proposed Transit District DTPP Amendments, while maintaining the same number of residential units, and therefore employed residents, the Reduced Office Mix Alternative would result in 3.3 jobs per employed resident in the Transit District area, one-fourth lower than the ratio of 4.4 for the proposed Transit District DTPP Amendments.

Public Services and Utilities and Infrastructure

As discussed in Chapter 8, *Public Services and Recreation*, the proposed Transit District DTPP Amendments would have less-than-significant effects with respect to public services (police, fire, and emergency medical services; parks and recreational facilities; schools; and libraries). With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative would likewise have less-than-significant impacts with respect to public services.

As discussed in Chapter 10, *Utilities and Infrastructure*, the proposed Transit District DTPP Amendments would have less-than-significant effects with mitigation with respect to water supply. The proposed Transit District DTPP Amendments would have less-than-significant impacts with respect to the construction of water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities; wastewater treatment capacity; and solid waste. The proposed Transit District DTPP Amendments would also have less-than-significant impacts with respect to water quality; groundwater recharge; storm drainage; flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and consistency with a water quality control plan or sustainable groundwater management plan. With the same land uses at a reduced intensity in at least some of the same locations, the Reduced Office Alternative would likewise have less-than-significant impacts with respect to utilities and infrastructure (including hydrology and water quality). In particular, annual water demand would be reduced by approximately 14 percent, compared to that with the proposed Transit District DTPP Amendments. Water demand would be about 5 percent less than that of the Altered Land Use Mix and about 37 percent greater than that of the Reduced Development Alternative.

Other Impacts

Effects related to the footprint of subsequent development projects would generally be the same as or similar to those of the proposed Transit District DTPP Amendments. This is because the locations of subsequent development projects would not necessarily change, although lesser office development would occur within the proposed Transit District area. That is, it is likely that the existing Sequoia Station shopping center would be redeveloped under this alternative. However, while the existing Redwood City Transit Center site could also be redeveloped if the Caltrain station and transit center were to be relocated and expanded, it is anticipated that under this alternative, new development on this site would be limited to residential use. Because any change in the footprint of subsequent development projects, if any, cannot be known at this time, it is assumed that excavation could potentially disturb archaeological or tribal cultural resources, potentially result in exposure of workers or the public to subsurface soil or groundwater contamination, and potentially disturb paleontological resources to the same or a similar degree as would be the case with the proposed Transit District DTPP Amendments. Likewise, building demolition could adversely affect historical resources to the same or a similar degree as with the proposed Transit District DTPP Amendments. Additionally, the Reduced Office Alternative could result in the same or similar disturbance of nesting birds and removal of

trees that could result from construction of subsequent development projects in the Transit District area. Finally, this alternative could, like the proposed Transit District DTPP Amendment, the Reduced Development Alternative, and the Altered Land Use Mix Alternative, result in the same or similar development on potentially expansive or corrosive soils. Each of these impacts—Impact CR-1, CR-2, CR-4, HAZ-6, BIO-4, BIO-5, GEO-4, and GEO-6—would be less than significant with mitigation under the Reduced Office, as would be the case with the proposed Transit District DTPP Amendments.

As with the proposed Transit District DTPP Amendments and the other two build alternatives (Reduced Development and the Altered Land Use Mix), effects of the Reduced Office Alternative would be less than significant with respect to land use and aesthetics (including shadow), because the same office and residential uses would be developed in at least some of the same locations as with the Transit District area, although office development would be at lesser intensity. However, one or more subsequent individual development project(s) could be the same as, or similar to, individual development project(s) that could be developed pursuant to the proposed Transit District DTPP Amendments.

Conclusion

The Reduced Office Alternative would not necessarily avoid the proposed Transit District DTPP Amendments’ potentially significant and unavoidable effect of subsequent individual development projects with respect to emissions of criteria air pollutants (Impact AQ-2) because, like the proposed Transit District DTPP Amendments, the Reduced Development Alternative, and the Altered Land Use Mix Alternative, it could lead to one or more subsequent development projects that would exceed the BAAQMD project-specific thresholds of significance for criteria air pollutants. As noted above, however, at this time, the severity of this impact cannot be accurately known, pending analysis of a specific project and application of project-specific mitigation measures, and therefore this impact is conservatively assumed to be significant and unavoidable. The Reduced Office Alternative likewise would not avoid the proposed Transit District DTPP Amendments’ potentially significant and unavoidable effect with respect to climate change (Impact CC-1) because, like the project and the other alternatives, development would be subject to the City’s Reach Codes with respect to limited exceptions to allow use of natural gas, and would therefore not fully comply with BAAQMD’s adopted GHG threshold.

The Reduced Office Alternative would address each of the City’s objectives for the proposed project, particularly with respect to housing, as the number of housing units would remain the same as with the project. This alternative would address the City’s objectives to a greater degree than would the Reduced Development Alternative or Altered Land Use Mix Alternative. Although this alternative would result in 25 percent less office floor area than would the proposed Transit District DTPP Amendments, the Reduced Office Alternative would nevertheless—like the proposed project—create a new mixed-use sub-area within the DTPP with office, residential, and retail uses, including a Transit District-specific office development cap; allow for redevelopment of the existing Sequoia Station and Transit Center sites; anticipate an expanded and relocated Caltrain

station; make circulation improvements; lower parking requirements; require frontage improvements; provide additional design flexibility; and maintain existing DTPP building heights. On balance, therefore, the Reduced Office Alternative would meet the spirit of each of the project objectives. In addition, the reduced Office Alternative may be considered more likely to be constructed than the Reduced Development Alternative or the Altered Land Use Mix Alternative for reasons of economic viability. This is because this alternative would have a greater amount of office floor area and office use generally has a higher marked value, on a per-square-foot-basis, than does multi-family residential, retail, or industrial space.²

19.7 Environmentally Superior Alternative

The CEQA Guidelines specify that an EIR must identify the environmentally superior alternative among those discussed. If the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. (CEQA Guidelines Section 15126.6(e)(2)).

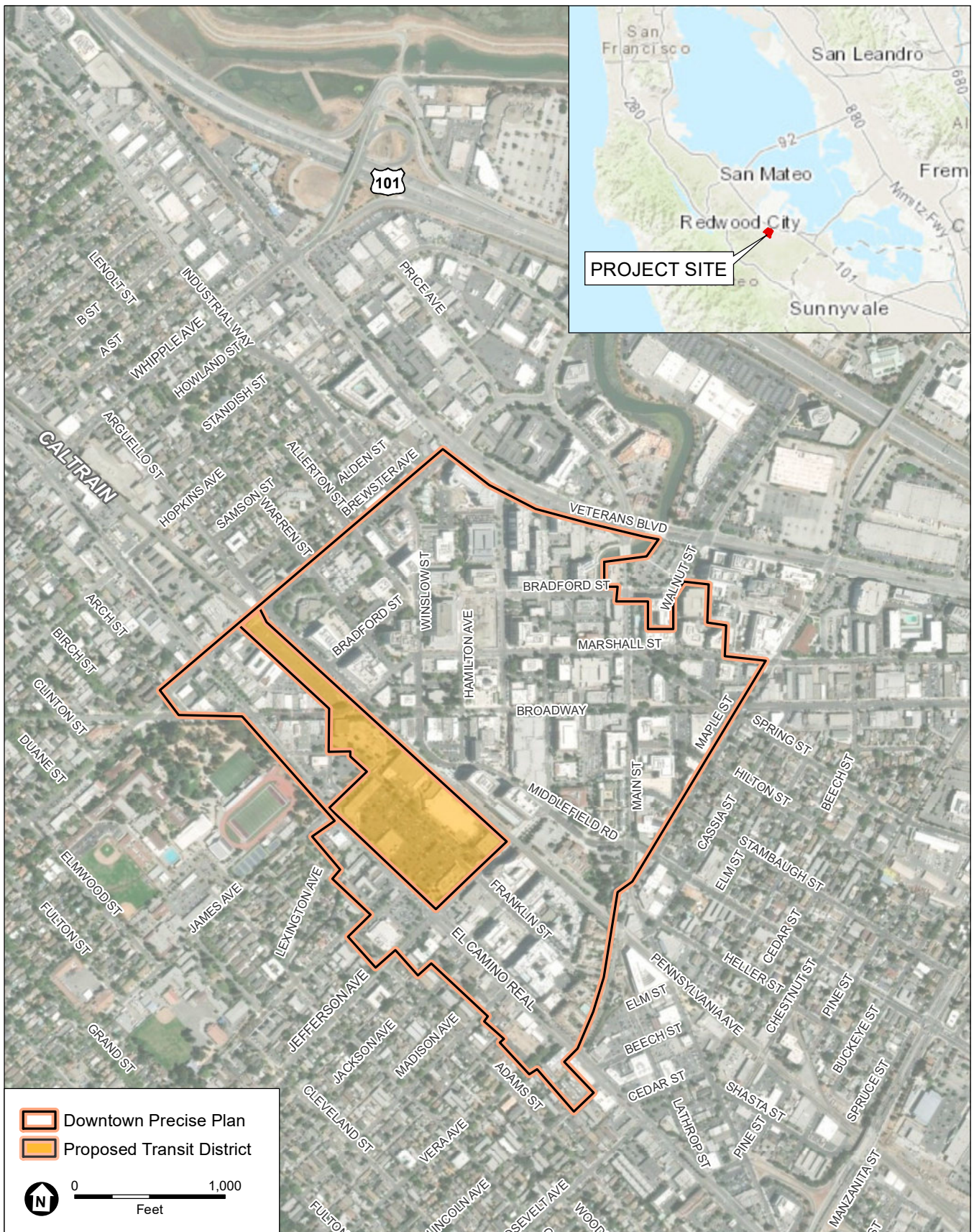
In this case, the Reduced Development Alternative is the environmentally superior alternative because it would likely reduce the severity of the project’s significant air quality impacts with respect to criteria air pollutants (Impacts AQ-2 and C-AQ-1). As stated above in the analysis of the Reduced Development Alternative, “Because the Reduced Development Alternative would develop the same office and residential land uses at a lesser intensity than would the proposed Transit District DTPP Amendments, it would be less likely that one or more individual projects could exceed the BAAQMD screening thresholds.” Nevertheless, as also explained above, it cannot be stated with certainty that, under this alternative, impacts from all subsequent development projects would be less than significant, even with mitigation. Conversely, the Reduced Development Alternative likely would not avoid the proposed project’s significant and unavoidable impacts with respect to climate change. This is because, as explained in Chapter 13, *Climate Change*, while Mitigation Measure CC-1 would impose stricter requirements on subsequent development projects with respect to use of natural gas and compliance with electric vehicle charging requirements in the California Green Building Standards Code (CALGreen Code) than are imposed by the Redwood City Reach Codes, development under this alternative would nevertheless be subject to the City’s Reach Codes with respect to limited exceptions to allow use of natural gas, and would therefore not fully comply with BAAQMD’s adopted GHG threshold, which permit certain exceptions to the foregoing. If, as described in Chapter 13, full implementation of Mitigation Measure CC-1 proves infeasible, then the Reduced Development Alternative would result in significant and unavoidable climate change impacts, similar to those of the proposed project.

² Economic & Planning Systems, Inc. Redwood City Fiscal Analysis of Land Uses, August 2021. Available at: [https://webapps.redwoodcity.org/files/cd/main/EPS201062_RedwoodCityLandUseFiscal_8.17.21-\(final\)-1.pdf](https://webapps.redwoodcity.org/files/cd/main/EPS201062_RedwoodCityLandUseFiscal_8.17.21-(final)-1.pdf). Accessed October 2, 2022.

Nevertheless, on the whole, due to the overall reduced scale of development, this alternative was found to provide a greater decrease in significant environmental impacts, compared to those of the proposed project, than the other alternatives considered. In particular, compared to the proposed Transit District DTPP Amendments, the Reduced Development Alternative would generate approximately 22 percent fewer daily vehicle trips and daily vehicle miles traveled (VMT); would result in approximately 0.3 fewer daily VMT per resident and per employee; would result in somewhat less traffic noise; and would generate demand for 31 percent less water.

It should be noted, however, that the comparisons noted above are between development entailing the same mix of uses but at only about two-thirds of the intensity of the proposed Transit District DTPP Amendments. Assuming that demand would still exist for the intensity of development projected under the proposed Transit District DTPP Amendments, and to the extent that the demand for additional developed space that would otherwise be built pursuant to the proposed project would be met elsewhere in the Bay Area, employees in and residents of such development could potentially generate greater impacts on transportation systems (including vehicle miles traveled), air quality, and greenhouse gases than would be the case for development on the more compact and better-served-by-transit project site. This would be particularly likely for development in more outlying parts of the region where fewer services and less transit access is provided. While it would be speculative to attempt to quantify or specify the location where such development would occur and the subsequent impacts thereof, it is acknowledged that the Reduced Development Alternative would incrementally reduce local impacts in and around the project site and in Downtown Redwood City, while potentially increasing regional emissions of criteria air pollutants and greenhouse gases, as well as regional traffic congestion. Further to the extent that the demand for additional residential units, in particular, would be met through single-family homes rather than the multi-family housing assumed within the proposed Transit District, the Reduced Development Alternative could also result in greater water usage. This alternative could also incrementally increase impacts related to “greenfield” development on previously undeveloped locations in the Bay Area and, possibly, beyond.

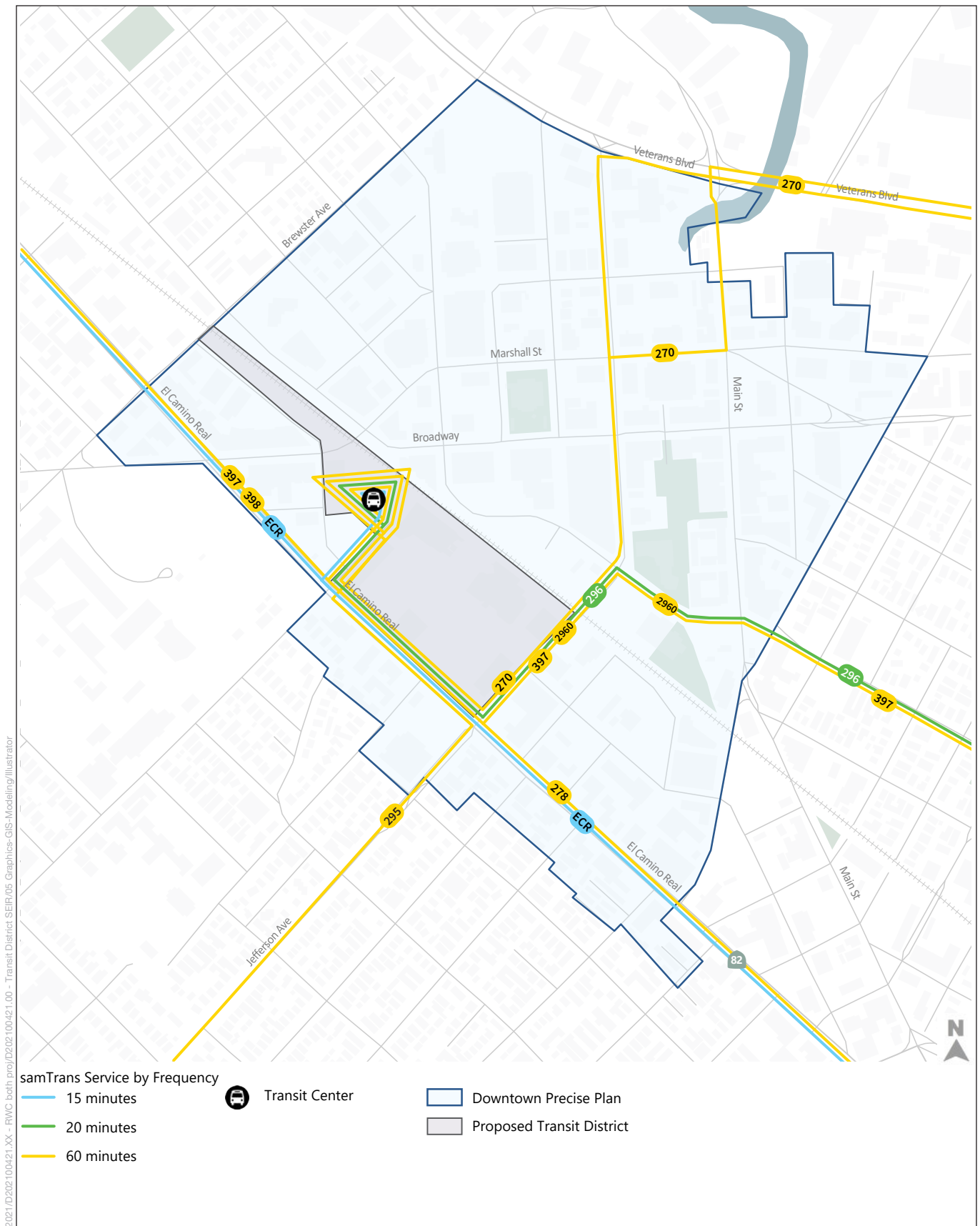
Conversely, the Reduced Office Alternative, while it would assume development of 26 percent more total floor than the Reduced Development Alternative, would result in the same decrease, compared to the project, in VMT per employee as would the Reduced Development Alternative (although VMT per resident for the Reduced Office Alternative would be about 5 percent greater than for the Reduced Development Alternative). Therefore, the Reduced Office Alternative could potentially avoid some of the assumed impacts of the Reduced Development Alternative set forth in the preceding paragraph with respect to employment-based VMT, while at the same time accommodating a greater share of regional growth, compared to the Reduced Development Alternative, in a compact, transit-oriented location.



SOURCE: ESRI Imagery; City of Redwood City, 2021

Transit District DTPP Amendments SEIR

Figure 3-1 (revised)
Project Site Location



2021/D202100421.XX - RWC both pro/D202100421.00 - Transit District SEIR/05 Graphics-GIS Modeling/Illustrator

SOURCE: Fehr & Peers, 2022

Transit District DTPP Amendments SEIR

Figure 9-2 (revised)
Existing Transit Service





SOURCE: ESA, 2022; Google Earth, 2022

Transit District DTPP Amendments SEIR

Figure 11-2 (revised)
Noise Monitoring Locations

Chapter 3

Comments and Responses

3.1 Introduction

This section contains copies of the written comment letters received during the public review period (May 6, 2022 through June 21, 2022) for the Transit District DTPP Amendments Draft SEIR. Each letter received during this comment period is reproduced here in its entirety.

3.2 Comments and Responses

Each written comment letter is designated with commenter code in upper right-hand corner of the letter. As discussed in Section 1.2 in this Response to Comments document, the commenter code begins with a prefix indicating whether the commenter represents a public agency (A), an organization (O), an individual (I), or a speaker at the public hearing (PH). This is followed by a hyphen and the acronym of the agency or organization, or the individual's last name.

Within each written comment letter, individual comments are labeled with a number in the margin. Immediately following each comment letter is a corresponding individual response to each numbered comment.

Within the public hearing summary, individual speaker comments are labeled with the name of the speaker followed by the numbered comment of the speaker in the margin. Immediately following the public hearing summary is a corresponding individual response to each numbered comment.

Where responses have resulted in changes to the Draft SEIR, the reader is referred to changes that appear in Chapter 2 of this Response to Comments document.

Under CEQA, the lead agency “shall evaluate comments on environmental issues” received from people who have reviewed a draft EIR and prepare written responses that “describe the disposition of each significant environmental issue that is raised by commenters” (Pub. Res. Code Section 21091(d); CEQA Guidelines Section 15088(c)). CEQA does not require that substantive responses be provided for comments that do not address the adequacy or accuracy of the environmental analysis in the Draft SEIR or that do not raise a significant environmental issue (Id.). This may include, but is not limited to, opinions on the project and other miscellaneous opinions, socioeconomic comments, and quality of life comments.

The City acknowledges the public's concerns about these types of issues. While the City generally does not provide individual responses to these comments in this Final SEIR, in some cases, the City has elected to provide individual responses to certain non-CEQA issues for

informational purposes. In all cases, these non-CEQA comments are part of the record on the Redwood City Transit District DTPP Amendments, and will be considered by the City decision-makers as part of the project consideration process.

3.2.1 Draft SEIR Comment Letters – Agencies

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



June 21, 2022

SCH #: 2021080554
GTS #: 04-SM-2021-00440
GTS ID: 24106
Co/Rt/Pm: SM/82/4.249

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

Re: Redwood City Transit District Draft Supplemental Environmental Impact Report (DSEIR)

Dear Lindy Chan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Redwood City Transit District Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the May 2022 draft SEIR.

1

Project Understanding

The project would create a Transit District overlay within the Downtown Precise Plan to allow for redevelopment of the existing Transit Center and Sequoia Station properties, reserve space for a potential future four-track Caltrain station north of the existing station, as well as circulation improvements to ensure adequate vehicular, bicycle and pedestrian connections. The project would also establish office and residential development caps within the Transit District.

2

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

3

Caltrans' acknowledges that the project Vehicle Miles Travelled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the SEIR, the Project is

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Lindy Chan, Principal Planner
June 21, 2022
Page 2

considered to have a less-than-significant VMT impact, and no VMT mitigation measures are required.

↑ 3 cont.

Active Transportation

Caltrans acknowledges and supports the Project's commitments to bicycle and pedestrian access, notably increasing bicycle parking requirements as infill development changes parking demand.

↑ 4

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

↑ 5

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO acting for MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

Responses to Comments from California Department of Transportation – June 21, 2022 Letter

Comment A-CAL-1

The commenter indicates its agency is committed to ensuring that impacts of the State’s multimodal transportation system and to the natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system.

Response A-CAL-2

The comment is noted; please see responses to additional comments that follow.

Comment A-CAL-2

The commenter summarizes some of the principal components of the proposed Transit District DTPP Amendments.

Response A-CAL-2

No response is required.

Comment A-CAL-3

The commenter acknowledges that the VMT analysis conducted for proposed Transit District DTPP Amendments was undertaken in a manner consistent with the Office of Planning and Research Technical Advisory, and that the Transit District DTPP Amendments SEIR found the VMT associated with the project to be less than significant, with no mitigation required.

Response A-CAL-3

These comments are noted. As demonstrated in the Draft SEIR, Impact TR-2, new vehicle trips generated by the proposed Transit District DTPP Amendments would not exceed VMT thresholds established by the City. Furthermore, the effect of roadway network changes proposed by the Transit District DTPP Amendments was found to not have a substantial effect on VMT. Therefore, implementation of the proposed Transit District DTPP Amendments would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b), and as a result, the impact would be less than significant.

Comment A-CAL-4

The commenter expresses support for the proposed Transit District DTPP Amendments commitment to bicycle and pedestrian access, including increasing bicycle parking requirements.

Response A-CAL-4

The comment is noted. The Transit District DTPP Amendments propose pedestrian, bicycle, and transit enhancements to increase safety and connectivity to and from the envisioned relocated Redwood City Transit Center while providing adequate vehicle access and circulation. Proposed amendments to incentivize shared parking, increase bicycle parking ratios, and improve access to long-term and short-term bicycle parking would support the City’s goal to increase multimodal access and reduce single-occupancy vehicle trips.

Comment A-CAL-5

The commenter indicates any Caltrans facilities that may be impacted by the proposed Transit District DTPP Amendments must meet American Disabilities Act (ADA) Standards as applicable; and that bicycle and pedestrian access must be maintained during construction.

Response A-CAL-5

These comments are acknowledged. Because the Draft SEIR is a programmatic document, it does not contain project-specific information that would typically be used to establish procedures for maintaining traffic, pedestrian, and bicycle access during project construction. However, as required by state law, any work conducted within the right-of-way of Caltrans facilities (i.e., El Camino Real) would require project applicant to obtain an encroachment permit from Caltrans, which would include requirements related to traffic management (i.e., traffic control plan). Furthermore, the City's standard Conditions of Approval (COAs) include a standard development requirement that projects that include lane closures on City streets during project construction must implement an approved traffic control plan. The Caltrans and City requirements noted above would ensure that pedestrian and bicycle access would be maintained during project construction activities. With respect to ADA compliance of transportation facilities constructed/reconstructed within the Transit District, any new or reconstructed facilities would be designed following applicable standards and codes, including but not limited to the City's engineering standards, California Building Code, and Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG) by the U.S. Access Board.



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August 24, 2022

Lindy Chan, Principal Planner
City of Redwood City
1017 Middlefield Road
Redwood City, CA 94063
lchan@redwoodcity.org

SUBJECT: Comments on the Draft SEIR for the Redwood City Transit District DTPP Amendments

Dear Lindy Chan:

Thank you for the opportunity to comment on the Draft SEIR for the Redwood City Transit District DTPP Amendments. This project includes redevelopment of the existing Transit Center utilized by Caltrain and SamTrans; redevelopment of Sequoia Station, including an underground parking garage owned by SamTrans; additional space to accommodate four-track expansion for Caltrain; and circulation improvements associated with potential grade separations.

1

The Redwood City Transit Center is one of SamTrans' most important regional hubs and provides crucial bus-to-train and bus-to-bus connections, including transfers between Route ECR, SamTrans' most productive route, and other bus routes. Additionally, this hub is operationally significant as it provides a location for our bus operators to layover and recover, as well as provides restroom access. Therefore, SamTrans offers the following comments on the Draft SEIR:

Correction to Summary of SamTrans Bus Service at Redwood City Transit Center

Table 9.1.4 and Figure 9-2 summarize SamTrans service and frequency within the proposed Transit District. SamTrans would like to offer the following correction to reflect service that was in place at the time the transportation analysis was completed (April 2022):

2

- Route 296 runs on 20-minute headways on weekdays

Additionally, we ask that the Draft SEIR consider the service levels approved in the final Reimagine SamTrans Plan (adopted in March 2022). The first phase of implementation occurred on August 7, 2022, and subsequent phases are planned for 2023. The table below summarizes the bus service that is (or will be) offered at the Transit Center under the Reimagine service plan.

Reimagine Sam Trans Summary of Bus Service at Redwood City Transit Center

Route	Frequency
270	60 min
275	20-30 min
276	15 min
295	60 min
296	15 min
ECR	15 min
EPX	30 min (Peak Only)

2 cont.

Short- and Medium-Term Impacts to the SamTrans Area within the Transit Center

The proposed Transit District DTPP Amendments and the Draft SEIR assume that development will occur on the site of the existing Redwood City Transit Center and assume that the station (including the SamTrans bus hub) has relocated to the Perry Parcel at the northern end of the Transit District. However, the Draft SEIR does not address the potential short- and medium-term impacts to SamTrans bus service during the various phases of redevelopment in the Transit District. It's likely that the current Transit Center property will be developed before the future Transit Center at Perry Street is constructed.

SamTrans asks that future phasing plans and development approvals account for and mitigate this temporary impact to bus service. An interim solution should include adequate space(s) for bus-to-bus and bus-to-train connections, as well as provide the space needed for layovers and restroom access for SamTrans' operations. SamTrans would be challenged to provide the same service in Redwood City without access to this or a comparable facility for passenger and operational needs.

SamTrans supports the formation of the Transit District, the future development of the current Transit Center property, and the future relocation of the Transit Center to the Perry Parcel. SamTrans looks forward to working with the city of Redwood City, Caltrain, and other partners to develop this interim plan, with the goal of continuing to provide quality bus service in Redwood City and throughout the Peninsula.

If you have any questions regarding this response, please contact me at wegenerc@samtrans.com.

Sincerely,

Christy Wegener

Christy Wegener
Planning Director
SamTrans

Responses to Comments from San Mateo County Transit District (SamTrans) – August 24, 2022 Letter

Comment A-SAM-1

The comment summarizes the Draft SEIR project description and explains that the Redwood City Transit Center is one of SamTrans' most important regional hubs, providing critical bus and train connections and transfers, as well as a layover and restroom location for SamTrans drivers.

Response A-SAM-1

The comment is noted; please see responses to additional comments that follow.

Comment A-SAM-2

The comment provides one correction to service frequencies depicted in Draft SEIR Table 9-1 and Figure 9-2, as well as several service updates resulting from implementation of the final Reimagine SamTrans Plan adopted in March 2022.

Response A-SAM-2

Please see revisions to Table 9-14 and Figure 9-2 in Section 2.2, Revisions to the Draft SEIR, of this Final SEIR.

Comment A-SAM-3

The comment states that the SEIR should analyze potential short- and medium-term impacts to SamTrans bus service during the assumed redevelopment in the Transit District, including on the site of the existing Transit Center, which the comment states will likely be developed before the future Transit Center at Perry Street is constructed. The comment states that an "interim solution should include adequate space(s) for bus-to-bus and bus-to-train connections, as well as provide the space needed for layovers and restroom access for SamTrans' operations."

Response A-SAM-3

As stated in Draft SEIR Chapter 3, *Project Description*, among the City's objectives for the proposed project are to "allow for redevelopment of the existing Transit Center" and to "anticipate a potential future four-track Caltrain station, north of the existing station, that would allow for expanded service with completion of Caltrain's electrification program (currently under construction) and for long-term implementation of the Caltrain Business Plan." However, as also explained in Chapter 3 (footnote 10, page 3-7), staff of the Peninsula Corridor Joint Powers Board, which operates Caltrain, has identified additional space that would be needed to accommodate the enlarged and relocated Caltrain station, along with potential future grade separations to improve Caltrain operations and enhance safety. It is further stated that both the new station and potential grade separations are "separate projects that would be undertaken independently from the proposed Transit District DTPP Amendments analyzed in this SEIR and would be subject to additional, separate CEQA review." And it is stated in Draft SEIR Section 3.5.1, *Development and Land Use Controls*, that the SEIR evaluates potential development "on the site of the existing Redwood City Transit Center, *assuming that the station has relocated*" (emphasis added). Finally, in Chapter 17, *Cumulative Impacts* (page 17-4), the Draft SEIR explains that there are

two potential major projects that are “not funded, approved, or past the conceptual design phase”—Expansion and Relocation of Redwood City Caltrain station and Grade Separation at Caltrain Rail Crossings. The Draft SEIR continues, “While the City cannot speculate as to whether these projects will be implemented, they are described below as they are currently conceived for informational purposes only.” Accordingly, because potential future relocation and expansion of the Redwood City Caltrain station and Transit Center is not part of the proposed Transit District DTPP Amendments, nor is this separate project either funded, approved, or fully designed, effects of this potential future project, including secondary effects due to potential disruption of existing transit service, are properly not analyzed in this SEIR and would be the subject of separate environmental review at such time as the project becomes ready to proceed. It is noted that relocation and expansion of the Caltrain station and Transit Center would not be undertaken by the City of Redwood City, but instead would likely be pursued by Caltrain and SamTrans, the two relevant transit operators. Nevertheless, City staff are available to consult with Caltrain and SamTrans. Moreover, City staff agrees with SamTrans that disruption of existing transit service, including SamTrans bus service, should be avoided during any potential future development on or near the Transit Center. City staff would work with SamTrans staff to avoid or minimize such disruption at such time as actual development proposal(s) are put forth.



September 12, 2022

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

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Dear Lindy Chan:

Thank you for the opportunity to comment on the Draft SEIR for the Redwood City Transit District DTPP Amendments. The proposed amendments would create the Transit District, allowing for future redevelopment of the existing Transit Center and adjacent parking lot, which are owned by the Peninsula Corridor Joint Powers Board (JPB). In conjunction with the Sequoia Station properties, this creates the opportunity for a new hub of office, residential and retail uses adjacent to the Caltrain station.

While no plans are currently proposed for the redevelopment of the existing Transit Center, the JPB plans to redevelop this site with housing when the appropriate time arises. Therefore, the JPB supports removing the potential for office use on the JPB-owned property and adjusting the office development cap within the Transit District accordingly.

If you have any questions regarding this response, please contact me at (650) 508-7781.

Sincerely,

Brian W. Fitzpatrick
Director, Real Estate and Development

cc: Michelle Bouchard, Acting Executive Director
James Harrison, General Counsel

PENINSULA CORRIDOR JOINT POWERS BOARD
1250 San Carlos Ave. – P.O. Box 3006
San Carlos, CA 94070-1306 (650) 508-6200

Responses to Comments from Peninsula Corridor Joint Powers Board (Caltrain) – September 12, 2022 Letter

Comment A-JPB-1

The comment states that the JPB is no longer pursuing potential office development on the site of the existing Redwood City Caltrain station, in the event that the station is relocated in the future.

Response A-JPB-1

In response to this comment, the City has added a new alternative to Chapter 19, *Alternatives to the Proposed Project*, of the SEIR (see Chapter 2 of this Final SEIR). This new alternative, the Reduced Office Alternative, would include 1,230,000 square feet of office space (400,000 square feet less than the proposed Transit District DTPP Amendments) and the same 1,100 residential units.

3.2.2 Draft SEIR Comment Letters – Organizations



June 6th, 2022

Redwood City City Council
1017 Middlefield Road
Redwood City, CA 94063



RE: Endorsement of the Sequoia Station Project

Dear Redwood City Planning Commission,

For over 60 years, Greenbelt Alliance has helped create cities and neighborhoods that make the Bay Area a better place to live - healthy places where people can walk and bike; communities with parks, shops, transportation options; homes that are affordable - and defend the Bay Area's natural and agricultural landscapes from sprawl development. Greenbelt Alliance's "Grow Smart Bay Area" goals call for fully protecting the Bay Area's greenbelt and directing growth into our existing communities, and accomplishing both in a way that equitably benefits all Bay Area residents. Our endorsement program helps further these goals by providing independent validation of smart infill housing (development of vacant land within urban areas) and mixed-use projects (allowing for various uses like office, commercial and residential).

1

Greenbelt Alliance is pleased to conceptually endorse the proposed Sequoia Station project

This mixed-use development over 12 acres by Lowe and Eden Housing will add anywhere from 500-640 residential units while also dedicating land for Caltrain rail line expansion to be redeveloped into neighborhood serving retail, open space, and above-grade commercial office space. The project has a commitment for deep affordability, including a partnership with Eden Housing that will provide a 100% affordable housing project expected to provide 200-240 affordable units, far beyond the required 20%. The project site is well located directly adjacent to the Redwood City Caltrain Station as well as the El Camino Real corridor. It is everyone's responsibility to ensure that the land-use potential is maximized. This currently underutilized area will contribute to the City's vision for high quality, higher-density development and mixed-use opportunities. This project will encourage a walkable and vibrant community in Redwood City for residents across the income spectrum, provide a public open space and family-friendly retail uses, support the local economy, and offer a host of other environmental and quality of life benefits.

2

This is the kind of climate-smart development that we need in the Bay Area to meet our housing goals, reduce greenhouse gas emissions, and make sure that local residents are able to grow and thrive in their own communities. In closing, the development of the Sequoia Station project is another smart step for the City of Redwood City to ensure the creation of homes and vibrant communities near jobs, retail, and transit. We hope its approval will inspire communities around the Bay Area to redouble their efforts to grow smartly.

Sincerely,



Zoe Siegel

Director of Climate Resilience, Greenbelt Alliance

Responses to Comments from Greenbelt Alliance – June 6, 2022 Letter

Comment O-GA-1

The commenter discusses the Greenbelt Alliance's goals; and indicates their endorsement program further these goals by providing independent validation of infill housing and mixed-use projects.

Response O-GA-1

These comments are noted; no response is required.

Comment O-GA-2

The commenter indicates their organization conceptually endorses the proposed Sequoia Station project, and cites that project's commitment to affordable housing, and its beneficial location adjacent to the Redwood City Caltrain Station and El Camino Real corridor. The commenter adds that the Sequoia Station project will, among other things, help to meet the City's housing goals and reduce greenhouse gas emissions.

Response O-GA-2

The endorsement and comments made are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment Letter O-CSMC1

Subject: FW: Chamber San Mateo County enthusiastically supports the Redwood City Transit District

From: Amy Buckmaster
Sent: Tuesday, June 07, 2022 2:12 PM
To: GRP-Planning Commissioners <PC@redwoodcity.org>
Cc: Greg Greenway <seaportindustrial@yahoo.com>; CD-Lindy Chan <lchan@redwoodcity.org>; CD-Jessica Manzi <jmanzi@redwoodcity.org>
Subject: Chamber San Mateo County enthusiastically supports the Redwood City Transit District

Good Afternoon Chair Radcliffe and Members of the Planning Commission,

Chamber San Mateo County enthusiastically supports the Redwood City Transit District. We urge you to certify the Transit District EIR and move the planning process forward as quickly as possible.

1

Chamber San Mateo County supports the City's vision: **"The redevelopment of the Transit District creates a once-in-a-lifetime opportunity to rebuild the train station, create new housing and jobs, and improve routes for people walking and biking in our community."**

2

We see these benefits:

- Modernize the Redwood City train station to serve a growing population
- Facilitate the expansion and electrification of Caltrain
- Connect Downtown Redwood City to El Camino Real
- Enhance pedestrian safety across the rail tracks
- Reduce emissions by making it easy to walk, bike, and ride transit
- Support housing, shopping, and jobs downtown

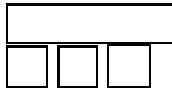
3

Chamber San Mateo County will make more detailed comments on the EIR by June 21.

Thank you for your consideration.

All my best,
Amy

--
Amy Buckmaster
President & CEO
Chamber San Mateo County
Office: [650-364-1722](tel:650-364-1722) | Fax: [650-364-1729](tel:650-364-1729)
Learn more about our Chamber at:



Responses to Comments from Chamber San Mateo County – June 7, 2022 Letter

Comment O-CSMC1-1

The commenter expresses support for the proposed Redwood City Transit District, certification of the Transit District DTPP Amendments SEIR, and moving the planning process forward expeditiously.

Response O-CSMC1-1

These comments are noted and will be forwarded to the City decisionmakers for their consideration.

Comment O-CSMC1-2

The commenter cites and expresses support for the District’s vision for the proposed Transit District.

Response O-CSMC1-1

These comments are noted and will be forwarded to the City decisionmakers for their consideration.

Comment O-CSMC1-3

The commenter indicates the proposed Transit District has several benefits, including to: modernize the Redwood City train station to serve a growing population; to facilitate the expansion and electrification of Caltrain; connect downtown to El Camino Real; to enhance pedestrian safety across the railroad tracks; reduce emissions by improving accessibility for walking, biking and transit; and support housing, shopping and jobs downtown.

Response O-CSMC1-1

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.



June 21, 2022

Nancy Radcliffe, Chair
Redwood City Planning Commission
City of Redwood City
1017 Middlefield Road
Redwood City, CA 94063

SUBJECT: Transit District DTPP Amendments Subsequent Environmental Impact Report

Dear Chair Radcliffe and Members of the Planning Commission:

Chamber San Mateo County believes that the Transit District is essential for Redwood City. We urge you to certify the SEIR without delay.

1

As the City says, "The redevelopment of the Transit District creates a once-in-a-lifetime opportunity to rebuild the train station, create new housing and jobs, and improve routes for people walking and biking in our community. The Transit District will complete the vision of the Downtown Precise Plan, incentivizing homes and jobs near transit. It aligns with the City's ambitious goal of exceeding State requirements for new housing over the next eight years. It will improve circulation in the downtown. It will enable the expansion and electrification of Caltrain service. Approval of the Transit District will solidify the City's regional leadership in promoting housing, transit, and transit-oriented development.

2

Every environmental document is subject to objections, but do not allow legitimate questions to obstruct progress on this essential project. As you know, certification of the SEIR is necessary to approve the General Plan and Transit District DTPP amendments. The SEIR gives thorough responses to environmental impacts and areas of concern. Seventeen of the twenty-two identified impacts are reduced to less than significant levels after mitigation. Given the extraordinary benefits of the Transit District, the Chamber strongly supports a decision of overriding consideration on the other five impacts. Not adopting a Transit District would certainly have an adverse impact on air quality by failing to support transit and transit-oriented development.

3

The Chamber offers these specific comments on the SEIR:

4

- Include Life Science as a land use in the Transit District, to be studied on a project basis
- Allow natural gas within the Transit District as allowed in the Reach Code

5

Chamber San Mateo County has approximately 1,400 members, including businesses, non-profit organizations, and educational institutions representing 80,000 employees countywide. Thank you for your consideration and leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy N. Buckmaster".

Amy N. Buckmaster
President & CEO

Responses to Comments from Chamber San Mateo County – June 21, 2022 Letter

Comment O-CSMC2-1

The commenter indicates the proposed Transit District is essential for Redwood City, and expresses support for certification of the Transit District DTPP Amendments SEIR.

Response O-CSMC2-1

The comment is noted, and will be forwarded to the City decisionmakers for their consideration.

Comment O-CSMC2-2

The commenter indicates the proposed Transit District has several benefits, including to incentivize homes and jobs near transit; improve circulation for walking and biking downtown; and enable expansion and electrification of Caltrain service. The commenter further indicates that approval of the Transit District will solidify the City's regional leadership in promoting housing, transit and transit-oriented developments.

Response O-CSMC2-2

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment O-CSMC2-3

The commenter notes that certification of the SEIR is necessary to approve the General Plan and Transit District DTPP amendments. The commenter further indicates that 17 of the 21 SEIR impacts are reduced to less than significant levels after mitigation; and expresses support for a decision of overriding considerations on the remaining significant impacts.

Response O-CSMC2-3

These comments are noted; no response is required.

Comment O-CSMC2-4

The commenter requests including life science as a land use in the Transit District, to be studied on a project basis.

Response O-CSMC2-4

The comment is noted. City staff has determined not to modify the conditional uses to include R&D (laboratory) at this time. In the event a project requests a DTPP amendment to allow it in the future, CEQA review would be completed for such an amendment at that time.

Comment O-CSMC2-5

The commenter requests allowing natural gas within the Transit District as allowed in the Reach Codes.

Response O-CSMC2-5

As discussed in the Draft SEIR, Chapter 13, Climate Change Impact CC-1, the City has adopted Reach Codes as amendments to the Energy and Green Building Standards Codes that include a requirement for all development seeking building permits to be “all-electric buildings.” However, the Reach Codes allows certain exceptions to the No Natural Gas standard (e.g., affordable housing and commercial kitchens). As a result, and because the Reach Codes do not currently ensure compliance with future updates to the CALGreen Tier 2 Electric Vehicle requirements, the Draft SEIR determined that the proposed Transit District DTPP Amendments would not fully comply with BAAQMD’s adopted GHG thresholds that all residential and non-residential buildings shall not include natural gas, and thus, would result in a new potentially significant impact. Accordingly, the Draft SEIR identified Mitigation Measure CC-1 that required enforcement of a no natural gas requirement that disallowed exceptions within the Transit District Area, along with ensuring compliance with EV requirements in CALGreen Tier 2.

Please note, however, that since the Reach Codes permit exceptions to the to the all-electric requirement, this mitigation measure may not be feasible for economic or other reasons, the impact was conservatively determined to be significant and unavoidable in the Draft SEIR. As explained in the Draft SEIR (page 13-25), the staff report for the September 2020 City Council meeting at which the Reach Codes were adopted, in order for local communities to adopt local amendments to state energy-related codes, the additional requirements must be cost effective pursuant to the California Public Resources Code. According to the staff report, the California Energy Commission “considers an energy efficiency measure cost effective if the total utility savings over the estimated useful life of the energy efficiency measure exceeds the difference of costs between the measure and the base line measure of mixed-fuel energy usage. For example, requiring all-electric space conditioning in single-family homes would be considered cost effective, if the total utility savings over 30 years exceeds the additional cost of the all-electric equipment when compared to the cost of a natural gas-powered space conditioner.” Accordingly, there may be circumstances where compliance with the Reach Codes is infeasible due to cost considerations. Since not all projects may be able to meet the all-electric requirements, the impact was determined to be significant and unavoidable.

Further, City staff, in developing the Reach Codes, relied on widely cited utility studies and community and stakeholder outreach; staff also considered Reach Codes adopted by other cities. As further discussed on Draft SEIR page 13-25, the staff report explained that with respect to commercial kitchens, “restaurant industry professionals had expressed concern about the current heat limitations of all-electric commercial cooking equipment and potential increased costs, particularly in light of the effect that the COVID-19 pandemic has had on the restaurant industry.” In addition, staff noted that other local cities have provided for similar exceptions. Regarding affordable housing, the staff report explained that funding for such development, and particularly tax credits, “are subject to a maximum allowable cost per unit, meaning that added costs of electric space heating could render such projects ineligible for funding.” According to the staff report, the natural gas exception for affordable housing could encourage developers to provide greater-than-required numbers of affordable units. Staff also noted that this exception would not preclude fully electric affordable housing and that affordable housing developers would be encouraged to explore this possibility. In fact, the applicant for the Sequoia Station

project, proposed within the Transit District, has determined that it is likely feasible to develop that project's affordable housing building as all-electric (see the response to Comment O-LEH-6).

Since the Draft SEIR contemplated that some projects would not be able to comply with the all-electric requirements of the Reach Codes, minor revisions were made to Mitigation Measure CC-1, as shown in Chapter 2, Revisions to the Draft SEIR in this Response to Comments document, to clarify that projects within the Transit District may obtain exceptions to the Reach Codes' all-electric requirements if those exceptions exist in the Reach Codes in effect at the time a building permit is issued.

Comment Letter O-HAC

From: Ali Sapirman <ali@housingactioncoalition.org>
Sent: Tuesday, June 21, 2022 4:30 PM
To: GRP-Planning Commissioners
Subject: Please support Draft Transit District Plan

Dear Planning Commissioners,

My name is Ali Sapirman and I am writing on behalf of the Housing Action Coalition, a member-supported nonprofit that advocates for creating more housing for residents of all income levels to help alleviate the Bay Area and California's housing shortage, displacement, and affordability crisis.

1

I am writing in strong support of the Draft Transit District Plan which will play a critical part in addressing our housing crisis.

Specifically,

- The Transit District Plan includes up to 1,100 critically-needed homes at all levels of affordability, that are located close to important community resources such as public transit. This in turn will lead to less cars on the road and a much smaller carbon footprint for the community.
- The inclusion of 1,100 new homes in the Transit District Plan will help Redwood City make significant progress on its RHNA allocation. The DSEIR states that with the development of the Transit District, Redwood City can utilize just 16 acres of land to satisfy almost one quarter of its RHNA requirement – and developing housing in a service and transit-rich area is a rare and high impact opportunity.
- Finally we are excited to see that The City of Redwood City is tackling the jobs/housing balance with an aggressive Housing Element that includes 150% of the required RHNA allocations, or more than 6,800 homes.
- By taking a city-wide approach to housing development, the City is setting itself up for success meeting its housing needs and advancing other priorities including transportation, equity, and long-term economic vitality.

2

As such, I ask for you to vote in support of the Transit District Plan.

In solidarity,

Ali Sapirman

Ali Sapirman | Pronouns: They/Them

South Bay Organizer | Housing Action Coalition
95 Brady Street, San Francisco, CA 94103
Cell: (407) 739-8818 | Email: ali@sfhac.org | Web: sfhac.org



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Responses to Comments from Housing Action Coalition – June 21, 2022 Letter

Comment O-HAC-1

The commenter briefly summarizes the Housing Action Coalition’s purpose.

Response O-HAC-1

No response is required.

Comment O-HAC-2

The commenter notes expresses support for the Transit District Plan, and states reasons why the Transit District Plan would play a critical part in the addressing the housing crisis, including: providing up to 1,100 homes of varying affordability close to community resources; helping the City make substantial progress towards its RHNA allocation; and addressing the jobs/housing balance issue with a housing element that includes 150 percent of the required RHNA allocation.

Response O-HAC-2

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.



Kelly M. Rem
Attorney at Law

June 21, 2022

By Email and U.S. Mail: lchan@redwoodcity.org

Lindy Chan
Principal Planner
City of Redwood City
1017 Middlefield Road,
Redwood City, CA

Re: Response of Sequoia Union High School District to Notice of Preparation of Subsequent Draft Environmental Impact Report Regarding the Downtown Precise Plan Amendments

Dear Ms. Chan:

This office represents Sequoia Union High School District (“District”). The District appreciates the opportunity to provide comments and input regarding the Subsequent Draft Environmental Impact Report (“Draft EIR”) regarding the proposed Transit District (“Project”).

1

The District has some concerns about the creation of the proposed Transit District area in the downtown Redwood City area and the effect of future development in that area on the District and its Sequoia High School (“SHS”). As stated in the Draft EIR, the Downtown Precise Plan area and proposed Transit District lie within the attendance boundary of the District’s Sequoia High School. (Draft EIR, Pg. 8-7). Future development in the Transit District area is anticipated to result in extensive impacts on school facilities that would require facility updates to increase school capacity, among other impacts. As such, the District requests that all direct and indirect impacts related to the Transit District, be thoroughly reviewed, analyzed, and mitigated.

2

The City of Redwood City (“City”) is considering amendments to its General Plan and the DTPP that would create the new Transit District sub-area, which would focus on transit-oriented development. (Draft EIR, Pg. 1-1.) The Transit District area would consist of approximately 16.6 acres of land and would be generally located between Brewster Avenue to the north, the Caltrain tracks to the east, and Perry Street to the west. (Draft EIR, Pg. 3-2.) The Transit District area contemplates transit-oriented development with a new hub of office, residential, and retail uses adjacent to the Redwood City Transit Center. As explained further below, creation of the Transit District area and associated development have the potential to impact the District and its students, and the District would like to see that potential impact addressed.

3

The District is willing to meet with City Staff to discuss the Transit District area or any general development occurring in the downtown area. The District is hopeful that opening the door to these discussions will yield solutions that benefit the District, the City, and the community as a

4

Limited Liability Partnership

Lindy Chan
June 21, 2022
Page 2

whole. With the foregoing in mind, the District requests that the City revise the Draft EIR to address the deficiencies identified in this letter, develop appropriate mitigation measures for impacts that are identified as significant, and then recirculate the revised Draft EIR as required by CEQA. (CEQA Guidelines § 15088.5.) In that process, the District requests that the City and future developers coordinate with and engage the District.

↑ 4 cont.
5

I. The Draft EIR does not meet its purpose as an informational document because it fails to provide an analysis of environmental impacts on and related to schools.

A. The Draft EIR fails to identify and analyze all impacts on school facilities under CEQA’s threshold of significance for Public Services impacts.

In its discussion of Public Services & Recreation, City points out that District’s capacity is approximately 10,062 students and that District’s student enrollment was 10,327 for the 2020-21 school year, which is in excess of District’s facility capacity. For the record these enrollment numbers appear to include charter schools. City also mentions that SHS enrollment for the 2020-21 school year was 2,019. In its analysis of Impact PS-5, the City estimated that the Transit District would result in approximately 451 new school-age children, consisting of 220 District high school students. (Draft EIR, Pg. 8-7-8.) In analyzing the impact of the influx of new students on District and SHS, City stated:

“[t]he addition of high school-aged students to SUHSD due to development within the proposed Transit District would exceed the current capacity at the collective SUHSD high schools and at Sequoia High School...[t]hus, facility updates to increase capacity would also likely be required for SUHSD and particularly at Sequoia High School to accommodate growth in high school-aged students.” (Draft EIR, Pg. 8-8.)

6

City’s conclusory discussion of this impact on school facilities is inadequate as it fails to meaningfully analyze all potential impacts under the Public Services CEQA standard, including but not limited to: (1) whether the influx of students would require “physically altered” school facilities unrelated to the accommodation of additional enrollment; (2) whether other impacts of proposed development, such as increased traffic, noise, or air pollutants in the neighborhood surrounding SHS, could impact the District’s need for new or physically altered school facilities; and (3) whether other impacts of the Project could otherwise interfere with the District’s ability to accomplish its own performance objectives.

The District anticipates that its ability to provide adequate services at SHS will be severely impacted by development in the Transit District area. For this reason, the District believes that the Draft EIR should have identified, described, and/or analyzed the following:

7

1. Existing and future conditions within the District, on a school-by-school basis, including size, location and capacity of facilities.
2. Adequacy of both existing infrastructure serving schools and anticipated infrastructure needed to serve future schools.

↓

Lindy Chan
June 21, 2022
Page 3

3. District's past and present enrollment trends.
4. District's current uses of its facilities.
5. Projected teacher/staffing requirements based on anticipated population growth and existing State and District policies.
6. Description of any impacts on curriculum as a result of anticipated population growth.
7. Cost of providing capital facilities to accommodate students on a per-student basis, by the District.
8. Expected shortfall or excess between the estimated development fees to be generated by future development and the cost for provision of capital facilities.
9. An assessment of the District's present and projected capital facility, operations, maintenance, and personnel costs.
10. An assessment of financing and funding sources available to the District, including but not limited to those mitigation measures set forth in Section 65996 of the Government Code.
11. Any expected fiscal impacts on the District, including an assessment of projected cost of land acquisition, school construction, and other facilities needs.
12. An assessment of cumulative impacts on schools resulting from additional development already approved or pending.
13. Identification of how the District will accommodate students from the Transit District area who are not accommodated at current District schools, including the effects on the overall operation and administration of the District, the students and employees.

7 cont.

Without consideration of the above, the Draft EIR fails as an informational document.

Finally, the Draft EIR fails to analyze adequately cumulative public services impacts on the District due to extensive new development within District boundaries. EIRs must discuss cumulative impacts of a project when the project's effects on the environment, viewed in conjunction with impacts of other past, present, or reasonably foreseeable future projects, is cumulatively considerable. (CEQA Guidelines § 15130(a); see, *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 CA4th 713, 720, finding that piecemeal approval of several projects with related impacts could lead to severe environmental harm.) The purpose of the cumulative impacts analysis is to avoid considering projects in a vacuum, because

8

Lindy Chan
June 21, 2022
Page 4

failure to consider cumulative harm may risk environmental disaster. (*Whitman v. Board of Supervisors* (1979) 88 CA3d 397, 408.)

It is likely that the District will exceed its facilities capacity at various locations throughout its boundaries in the coming years, including at SHS, as was predicted by the City. The District anticipates both that the combined impact of the Project and other development projects in District boundaries will significantly impact the District's ability to provide its public service in accordance with established performance objectives, and that the Project's incremental effect is cumulatively considerable. (CEQA Guidelines § 15130(a).) Because the District currently exceeds capacity in various locations, it is further anticipated that the Project, when viewed in conjunction with numerous other projects, will cause the District to need new or physically altered school facilities, including at SHS. At this point, given the barrage of pending and approved development within District boundaries, the need for new or altered facilities has likely become unavoidable.

The Draft EIR was required to provide sufficient information for the public and lead agency to assess these impacts and potential mitigation measures. The environmental documents do not provide this information.

B. The Draft EIR contains an inadequate discussion of all other “school-related” impacts.

In addition to impacts on the District's facilities under the Public Services CEQA threshold of significance noted above, the Draft EIR fails adequately to analyze probable Project impacts “related to” schools, as required by CEQA and case law interpreting CEQA. In disregarding these impacts, the City erroneously asserts that payment of school impact fees constitutes full and complete mitigation of school impacts from development. City bases this assertion on Government Code section 65996 and its own similar finding in the Downtown Precise Plan's Final Environmental Impact Report. However, reliance on SB 50 and Government Code section 65996 as the remedy for all school impacts caused by the Project on the District demonstrates a misunderstanding regarding the law and developer fees.

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

From a practical standpoint, the amount of developer fees received by school districts typically fall woefully short of alleviating the impacts caused by development. This is due largely to the facts that: (1) statutory developer fee amounts fail to acknowledge the differences in costs of school construction from one district to another, which particularly burdens school districts in the



8 cont.,

9

Lindy Chan
June 21, 2022
Page 5

Bay Area, where both land and construction costs significantly exceed other parts of the state; (2) the developer fee amounts fail to contemplate the special facilities needs of those districts experiencing rapid growth, such as the need for portables; and (3) the adjustment formula for developer fees is based on a “construction cost index” and does not include indexing related to the increases in land costs, resulting in the actual costs of facilities (i.e., land and improvements) increasing at a greater rate than the adjustment.

The inadequacy of developer fees as a source of funding for school facilities has forced school districts to rely increasingly on other sources of funding, primarily including local bond funds and State bond funds administered under the State’s School Facilities Program (SFP). However, these sources of funds can be equally unreliable. Local bond funds are difficult to generate, as local bonds are subject to school district bonding capacity limitations and voter approval. State funds are also unreliable and take considerable time to obtain, especially during this time of funding uncertainty caused by the outbreak of COVID-19. Either way, the funding formula was never intended to require the State and local taxpayers to shoulder a disproportionate portion of the cost of school facilities.

SB 50 declares that the payment of the developer fees authorized by Education Code section 17620 constitutes “full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities.” (Gov. Code § 65995(h); see also, Gov. Code § 65996(a).) **However, California courts have since acknowledged that payment of developer fees does not constitute full and complete mitigation for school-related impacts other than impacts “on school facilities” caused by overcrowding.** (*Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016 (“*Chawanakee*”).) *Chawanakee* addressed the extent to which the lead agency (Madera County) was required to consider school-related impacts in an EIR for new development. The court determined that SB 50 does not excuse a lead agency from conducting environmental review of school impacts other than an impact “on school facilities.” The court required that the County set aside the certification of the EIR and approvals of the project and take action necessary to bring the EIR into compliance with CEQA. (*Id.* at 1029.) In so holding, the court explained as follows:

[A]n impact on traffic, even if that traffic is near a school facility and related to getting students to and from the facility, is not an impact ‘on school facilities’ for purposes of Government Code section 65996, subdivision (a). From both a chronological and a molecular view of adverse physical change, the additional students traveling to existing schools will impact the roadways and traffic before they set foot on the school grounds. From a funding perspective, the capped school facilities fee will not be used by a school district to improve intersections affected by the traffic. Thus, it makes little sense to say that the impact on traffic is fully mitigated by the payment of the fee. In summary ... the impact on traffic is not an impact on school facilities and, as a result, the impact on traffic must be considered in the EIR.

(*Id.* at 1028-29.)

Here, for example, the lack of capacity at SHS creates the possibility that students generated by the Project will need to travel greater distances to attend other District schools. This will result



9 cont.

Lindy Chan
June 21, 2022
Page 6

in an overall increase in vehicle miles traveled (VMT) that has not been analyzed or addressed in the EIR. (Cal. Code Regs., tit. 14, § 15064.3.)

Contrary to the assertions of the Draft EIR, the payment of fees does not constitute full mitigation for all impacts caused by development, including those related to traffic, noise, biological resources, air quality, pedestrian safety, and all other types of impacts “related to” the District and its educational program. The Draft EIR’s approach is significantly flawed and inconsistent with the requirements of *Chawanakee*, as it failed to analyze 27 sub-categories of information that are necessary to determine whether the Project results in significant environmental impacts both on and *related to* schools.

Specific areas where the Draft EIR and Initial Study failed adequately to evaluate school-related impacts are discussed below:

i. Air Quality

The Draft EIR analyzes air quality impacts posed by construction and operation of the Project. The Draft EIR further recognizes that the proposed Project would pose a significant environmental impact if it would expose “sensitive receptors,” including schools, to substantial pollutant concentrations. (Draft EIR at 12-37.) The Draft EIR does not, however, specifically discuss potential construction and operational air quality impacts as they pertain to the District’s SHS, and students traveling to and from SHS. Air quality impacts on the District, its students, and staff have the potential to disrupt classes, prevent students from being outside during construction, and prevent students from traveling to and from SHS during construction. As mentioned in the Draft EIR, the SHS uses adjacent to the Project area are athletic fields. (Draft EIR at 11-10.) The Draft EIR should have analyzed the following:

14. The direct and indirect air quality impacts of the Project on SHS, including District students, families, and staff walking to and from SHS.
15. The cumulative air quality impacts on schools and the community in general resulting from increased vehicular movement and volumes expected from additional development already approved or pending in the City and Project neighborhood.

As the Air Quality impacts discussion does not provide sufficient information needed to analyze air quality impacts on the District’s students and SHS, the discussion of air quality impacts is lacking, and the Draft EIR is not in compliance with CEQA.

ii. Noise

As with its analysis of Air Quality impacts, the Draft EIR notes that SHS is a nearby “sensitive receptor.” As such, the Draft EIR appears to acknowledge that noise impacts on SHS must be analyzed. (See, Draft EIR at 11-10.) The Draft EIR discusses how Project construction may pose potentially significant impacts on sensitive receptors due to the generation of excessive groundborne vibration or groundborne noise levels. (Draft EIR at 11-24.) However, the Draft

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10

11

Lindy Chan
June 21, 2022
Page 7

EIR's analysis of noise impacts generally contains insufficient quantifiable data and analysis that would allow the public and lead agency to understand whether noise and/or vibration generated from either construction or operation of the proposed Project, including in combination with all past, present, and reasonably foreseeable future projects, would cause significant impacts on the District's educational program at SHS.

Noise impacts could disrupt classes, prevent students from being able to be outside due to overwhelming outside noise that would affect teachers' abilities to monitor and direct students because they cannot be heard, and lastly, could affect the interior of buildings in which students are housed. For these reasons, the District requested that the following information be discussed and analyzed in the Draft EIR:

16. Any noise sources and volumes which may affect school facilities, classrooms, and outdoor school areas.

Because the Draft EIR did not include sufficient quantifiable information related to the generation of noise and vibration impacts on SHS, the Draft EIR fails to serve its informational purpose.

iii. Population and Housing

The City anticipates that this Project will generate approximately 220 new high students, thus the Draft EIR should have analyzed the following in more detail:

17. Historical, current, and future population projections for the District.
18. The impacts of population growth within the District on the District's ability to provide its educational program.

Relatedly, the District requests that the following categories of information pertaining to housing be addressed:

19. The type and number of anticipated dwelling units indirectly resulting from the Project.
20. The average square footage for anticipated dwelling units, broken down by type of unit, indirectly resulting from the Project.
21. The estimated amount of development fees to be generated by development in accordance with implementation of the Project.

Population growth or shrinkage is a primary consideration in determining the impact that development may have on a school district, as a booming population can directly impact the District and its provision of educational services, largely because of resulting school overcrowding, while a district with declining enrollment may depend on new development to avoid school closure or program cuts. Overcrowding can constitute a significant impact within



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12



Lindy Chan
June 21, 2022
Page 8

the meaning of the CEQA. (See, Cal. Code Regs., tit.14, §§ 15064(e).) This is particularly true where the overcrowding results in unsafe conditions, decreased quality of education, the need for new bus routes, and a need for new school construction. (See, *Chawanakee, supra*, 196 Cal.App.4th 1016.)

The foregoing categories of information are critical for determining the extent of both physical and fiscal impacts on the District caused by increased population growth. As discussed above, California school districts are dependent on developer fees authorized by the provisions of Government Code sections 65995, *et seq.*, and Education Code sections 17620, *et seq.*, for financing new school facilities and maintenance of existing facilities. The developer fees mandated by section 65995 provide the District the bulk of its local share of financing for facilities needs related to development. The adequacy of the statutory development fees to offset the impact of new development on local school districts can be determined only if the types of housing and average square footage can be taken into consideration. For instance, larger homes often generate approximately the same number of students as smaller homes. At the same time, however, a larger home will generate a greater statutory development fee, better providing for facilities to house the student being generated. It is for these reasons that the Government Code now requires a school district to seek – and presumably to receive – such square footage information from local planning departments. (Gov. Code § 65995.5(c)(3).)

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

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

The District requests that the Draft EIR be modified to include the above categories of information so that the lead agency, District, and the public may adequately understand the direct and indirect impacts of the Project on the District. (CEQA Guidelines § 15126.2(a) [requires consideration of indirect impacts].)

II. The proposed mitigation measures and Project alternatives are inadequate to reduce the impacts related to schools to a less than significant level.

Based on the deficiencies of the Draft EIR described above, the Draft EIR's conclusion that payment of school impact fees will mitigate school impacts to a less than significant level is inaccurate. Since the Draft EIR is lacking in detailed discussion and analysis of existing and projected Project conditions, taking into account both the impact *on* school facilities and the impacts *related to* schools, the City cannot possibly reach the conclusion that developer fees are adequate to mitigate the Project's school impacts because all impacts have not been evaluated.



12 cont.



13

Lindy Chan
June 21, 2022
Page 9

Under the Government Code, the City has a duty to coordinate with the District to provide effective school site planning. The City should consider Project alternatives and/or alternative mitigation measures, such as those proposed below, to fulfill that duty.

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13 cont.

A. The Legislature Intended Coordinated Planning for School Sites

Government Code sections 65352 and 65352.2 (all subsequent code sections refer to the Government Code unless otherwise specified) require local cities and counties to coordinate planning of school facilities with school districts. The Legislature confirmed that the parties are meant to coordinate “[o]ptions for the siting of new schools and whether or not the local city or counties existing land use element appropriately reflects the demand for public school facilities, and ensures that new planned development reserves location for public schools in the most appropriate locations.”

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The Legislature recognized that new planned development should take into consideration and even “reserve” where schools would be located to serve the development because schools are as integral a part of planning for new development as is any other public service, such as fire, police, water and sewer. As it relates to this case, the intent behind sections 65350, *et seq.*, supports the District’s position that the City must analyze whether the District’s current facilities are adequate to accommodate and serve both its existing population and the new development, particularly in light of the Project impacts and cumulative factors addressed in this letter. The City can help the District provide adequate facilities resulting from any impacts of the Project, which are not addressed by developer fees, by requiring alternative mitigation measures to assure that there are adequate school facilities available to accommodate the District’s needs.

B. Alternative Mitigation Measures

District also requests consideration of the following alternative mitigation measures to address impacts related to schools, each of which begin to address the actual school related impacts discussed above.

1. Land Dedication

One possible mitigation method that was not addressed meaningfully in the Draft EIR, would be for the City to consider adopting findings requiring any developer building as part of the development allowed by the Project to dedicate land and/or funding pursuant to Government Code sections 65970, *et seq.*, which permit the City to require a developer to dedicate land to a school district.

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Section 65974 specifically states that “for the purpose of establishing an interim method of providing classroom facilities where overcrowded conditions exist, . . . a city, county, or city and county may, by ordinance, require the dedication of land, the payment of fees in lieu thereof, or a combination of both, for classroom and related facilities for elementary or high schools as a condition to the approval of a residential development.” Nothing in SB 50/Government Code section 65996 precludes this approach. Land dedication is a permissible mitigation measure

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Lindy Chan
June 21, 2022
Page 10

under Government Code section 65995, et seq. Section 65995(a) specifically states that “[e]xcept for a fee, charge, dedication, or other requirement authorized under Section 17620 of the Education Code, or pursuant to Chapter 4.7 (commencing with Section 65970), a fee, charge, dedication or other requirement for the construction or reconstruction of school facilities may not be levied. . . .” (Emphasis added.) Section 65995 expressly excludes Chapter 4.7, inclusive of section 65974, from this limitation, thus permitting a city to address conditions of overcrowding in school facilities or inadequately sized school sites by requiring, for example, the dedication of land.

15 cont.

A land dedication requirement would be good public planning benefiting all residents of the community, including future residents of the Project. Land suitable for new school facilities in Redwood City is already extremely scarce; it will only become more so if the Project is implemented and further development occurs. Under Government Code sections 65352 and 65352.2, the City has a duty to help plan for adequate services to its residents by ensuring that future sites are set aside for schools. Failure to do so leads to inadequate services, future controversies, and the potential need for a school district to exercise its rights under eminent domain, displacing existing residents. Therefore, mitigation for the impacts stemming from the Project that are not considered in the Draft EIR are and should be made available even after SB 50.

2. Phasing

Another method by which the City should work cooperatively with the District within all legal constraints to ensure adequate school facilities with regard to new development allowed by the Project, and which therefore can serve as an appropriate mitigation measure, is the requirement that all future development be phased, including all future development contemplated in the Transit District area. Timing development so as to balance the availability of school facilities with new development can significantly aid the District in its attempt to provide for the additional students who will be generated as a result of the Project and development following approval of the Project. Such phasing is not a denial of new development on the basis of insufficient school facilities in contravention to SB 50; it is instead appropriate planning to offset the impacts of new development.

16

III. Conclusion

Recirculation is required when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (CEQA Guidelines § 15162 (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (CEQA Guidelines, § 15162 (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt (CEQA Guidelines § 15162 (a)(3) (B)(3), (4)); or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043); *Laurel Heights*

17

Lindy Chan
June 21, 2022
Page 11

Improvement Assn. v. Regents of University of California (1993) 6 Cal.4th 1112, 1130, as modified on denial of reh'g (Feb. 24, 1994).)

It is the District's position that the Draft EIR is incomplete and does not adequately analyze the Project's potential impacts related to schools, or mitigation measures that would lessen these impacts. Chief among the District's concerns is the safety of students and the adequacy of school facilities, and these concerns are not adequately addressed in the Draft EIR as currently constituted. Changes must be made to preserve the safety of the students and allow them to enjoy productive time at adequate school facilities, free from excessive traffic, noise, and pollution. Therefore, the District requests that the Draft EIR be updated and recirculated. Further, the District requests that the City and future developers in the Transit District area meaningfully involve the District in that process, so as to promote a positive educational environment for existing and incoming residents of Redwood City.

17 cont.

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

Sincerely,

LOZANO SMITH



Kelly M. Rem

KMR/mag

Enclosures:

cc: Crystal Leach, Associate Superintendent, Administrative Services (cleach@seq.org)

Responses to Comments from Lozano Smith Attorneys at Law, on behalf of Sequoia Union High School District – June 21, 2022 Letter

Comment O-LS-1

The commenter thanks the City for providing an opportunity to review/comment on the Draft SEIR.

Response O-LS-1

No response is required.

Comment O-LS-2

The commenter expresses general concerns about potential direct and indirect impacts of the proposed Transit District DTPP Amendments on Sequoia High School.

Response O-LS-2

Due to lack of specificity in the comment, no direct response is possible. Specific concerns raised in comments that follow are addressed below in responses to Comments O-LS-6 through O-LS-17.

Comment O-LS-3

The commenter briefly summarizes the geographic boundaries and land uses proposed for the Transit District area and expresses a general concern about the impact of the proposed Transit District DTPP Amendments on the District and its students.

Response O-LS-3

Specific concerns are not identified in this comment and, therefore, no response is required. Specific concerns are addressed below in responses to Comments O-LS-6 through O-LS-17.

Comment O-LS-4

The commenter states the Sequoia Union High School District (SUHSD)'s willingness to meet with the City to further discuss its concerns regarding the proposed Transit District DTPP Amendments.

Response O-LS-4

The City currently collaborates with both the SUHSD and the Redwood City School District through regular and ongoing meetings that include representatives of the City Council. These "2+2+2" meetings include two representatives each from the City Council and school districts. The City looks forward to continuing to support the school districts through this process.

Comment O-LS-5

The commenter requests that the Draft SEIR be revised and recirculated to address deficiencies alleged in subsequent comments.

Response O-LS-5

As discussed in Section 1.1.4 in this Response to Comments document, based on the criteria in the CEQA Guidelines Section 15088.5, the Draft SEIR does not need to be recirculated.

Specific alleged deficiencies raised by the commenter in subsequent comments are addressed below in responses to Comments O-LS-6 through O-LS-17.

Comment O-LS-6

The commenter alleges that the Draft SEIR fails to properly evaluate the impacts caused by increased student enrollment in the SUHSD that would be generated as a result of development that would be allowed under the proposed Transit District DTPP Amendments.

Response O-LS-6

While there may be enrollment implications for the SUHSD, the potential effects of increased enrollment alleged in the SUHSD's letter would not be considered significant effects under CEQA, as explained in the Draft SEIR and below.

Based on the analysis in the Draft SEIR Public Services and Recreation section on pp. 8-16 and 8-17, and as discussed further in response to Comment O-LS-7, below, the payment of Senate Bill (SB) 50 fees by applicants of development projects allowed by the proposed Transit District DTPP Amendments would be, as a matter of law, sufficient mitigation for the project's direct impact on school facilities from increases in students pursuant to Government Code Section 65858, including in order to maintain SUHSD performance objectives. Any expansion of school facilities that would be required to undergo environmental review as they are identified. At that time, appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities.

In addition, as further detailed in the responses below, the potential construction- and operational-related environmental effects associated with development and implementation of the Transit District in the vicinity of the SUHSD facilities, including Sequoia High School, identified by the commenter as "other impacts...such as increased traffic, noise, or air pollutants..." are disclosed in this SEIR and would be less than significant with identified mitigation where applicable, and would not warrant further mitigation measures under CEQA. The City can additionally impose conditions of approval to address other concerns through its standard project review processes, but they would be separate from mitigation measures required under CEQA.

Comment O-LS-7

The commenter alleges that the Draft SEIR does not adequately describe a range of issues, including: existing and future conditions on a school-by-school and District-wide basis, as well as information on facility enrollment and use, infrastructure needs, funding and fiscal issues, cumulative effects, and operating characteristics.

Response O-LS-7

The Transit District DTPP Amendments SEIR is a program-level document that appropriately analyzes environmental impacts associated with the project, including those effects on public schools, on a programmatic basis. Accordingly, in the environmental setting section, the Draft SEIR presents existing SUHSD-wide enrollment, but also reports enrollment associated exclusively with Sequoia High School. The Draft SEIR also discusses the existing practice of collection of school impact fees from developers of new residential and non-residential building space as authorized by California Government Code Sections 65995 and 65996. The Draft SEIR further acknowledges that the impact fee revenue is used together with other SUHSD funds (e.g., State grants, general obligation bonds) to complete capital improvements. In the impacts section, the Draft SEIR estimates the projected increase in school age children anticipated to attend public schools, including the SUHSD, as a result of growth within the Transit District area. The Draft SEIR determined that the addition of high school-aged students to SUHSD as a result of the Transit District would exceed the current capacity at the collective SUHSD high schools and at Sequoia High School, and discloses that facility updates to increase capacity would likely be required for SUHSD - and particularly at Sequoia High School - to accommodate the growth in high school-aged students. The Draft SEIR concludes that any such facility updates or expansions would be required to undergo environmental review as they are identified, and appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of such facilities.

The Draft SEIR further notes that the Transit District would be required to comply with California Government Code Section 65996, which would mitigate the potential effect on public school facilities from the new student population that would be generated by the Transit District. California Government Code Section 65996 and Education Code Section 17620 authorize school districts to levy a development fee on new residential projects to offset the costs associated with new students present in the districts as a result of new development. Section 65996 states that the payment of school impact fees that may be required by a State or local agency constitutes full and complete mitigation of school impacts from development. The Draft SEIR finds that there would be no new or more severe impacts on school services associated with the Transit District than the impact identified in the DTPP Final EIR. Therefore, the Draft SEIR concludes the impact to public schools, including the SUHSD, would be less than significant.

There is no evidence provided by the commenter to suggest that the analysis of potential impacts to school facilities in the Draft SEIR is not sufficient to support its conclusions. Appendix G of the CEQA Guidelines supplies the relevant criteria for reviewing potential environmental impacts due to a project necessitating additional public facilities - like schools - and Appendix G simply asks whether those additional facilities would result in physical impacts to the environment. As stated in the Draft SEIR, any additional facilities that may be required to accommodate increased population will be required to undergo CEQA review if and when they are proposed and constructed.

SUHSD further claims that its ability to provide adequate service at Sequoia High School will be severely impacted by the project and requests information from the City to support this claim. Again, the requested information, although important for SUHSD to perform its own assessment

of its facilities and capabilities to achieve its performance standards, goes well beyond what is required by CEQA. CEQA considers a project's effect on the physical environment. Requests by SUHSD to investigate and provide to the SUHSD information about teacher/ student ratios; fiscal considerations related to school personnel, school facilities maintenance, and operational costs; school curriculum; and SUHSD finance and funding, for example, are outside the purview of the City and CEQA and are not relevant to the proposed Transit District Amendments' potential impacts on the environment. In fact, such information is uniquely available to the District—not the City—and if the City was required by CEQA to consider such information, it would look to the SUHSD to provide it. There is no dispute that this information is essential for SUHSD to perform its own mission; however, the City is not the agency charged with compiling and considering such information, and CEQA does not require that such information be included or addressed in a programmatic SEIR that would allow for additional mixed-use development within the Transit District area. See also how the SEIR addresses cumulative effects, below.

Comment O-LS-8

The commenter alleges that the Draft SEIR does not adequately address cumulative public service impacts.

Response O-LS-8

Regarding cumulative impacts, each topic in Draft SEIR adequately addresses cumulative public service impacts. Regarding cumulative impacts, the Draft SEIR specifically assesses the project's effects in combination with other reasonably foreseeable development in Chapter 17, Cumulative Impacts. The cumulative analyses rely both on a current list of reasonably foreseeable development projects in the City (see Section 17.1 on pp. 17-3 through 17-5) and on projections of future growth when the projections would be more meaningful for the assessment. As discussed in Section 17.2.5, Public Services, similar to individual projects developed within the Transit District area, cumulative projects would be subject to school impact fees which would fully mitigate the potential effect on public school facilities from the new student population that may be generated by cumulative development. As stated in response to comment O-LS-7, any expansion of Redwood City School District or SUHSD facilities would be required to undergo environmental review as they are identified. Appropriate measures would be identified and implemented as applicable to reduce any construction-related or operational effects of those facilities.

Comment O-LS-9

The commenter alleges that the Draft SEIR does not adequately evaluate other “school-related impacts.”

Response O-LS-9

The responses above summarize the adequate analysis of schools in the Draft SEIR and further substantiate that the City's CEQA analysis of school overcrowding and school-related impacts satisfies the state CEQA Guidelines. The Draft SEIR does not claim that SB 50 fees and Government Code Section 65996 are a panacea to all impacts from the proposed Transit District DTPP Amendments to be experienced by SUHSD. However, the law is clear that the provisions

of Government Code section 65996 are the “exclusive methods” available to the City for “considering and mitigating impacts on school facilities that might occur as a result of” the City’s approval of the project.

It is understood that SUHSD has other planned and phased improvements identified for Sequoia High School, as described in the school’s facility master plan, as amended. Phase 1 was proposed primarily to anticipate growth in student enrollment with occupancy of ten new classrooms scheduled for 2016. Those new classrooms were funded using Measure A monies approved by voters in 2014. Phase 2 and 3 projects emphasize maintenance, operations, and improvements to existing facilities. Bond proceeds, administered by SUHSD’s Bond Oversight Committee, and SB 50 developer fees provide funding for the school facilities related to changes in enrollment. The plight of school districts to plan, program, and fund for all school-related improvements is a larger issue and a serious one, as documented by SUHSD’s comments. Although the SB 50 fees and City conditions of approval would address project-related school facility impacts to the extent permitted by the Government Code, CEQA, and the City’s development review procedures, it is acknowledged that there remain serious and legitimate funding and other issues confronting SUHSD. CEQA, however, does not offer the SUHSD or the City a vehicle for considering and addressing all of those education and school-funding issues through the environmental review of a programmatic SEIR that would allow for additional mixed-use development within the Transit District area.

Responses to Comments O-LS-10 through O-LS-12, below, address the commenter’s specific “school-related impacts” comments on the following technical topics: Air Quality (O-LS-10), Noise (O-LS-11), and Population and Housing (O-LS-12).

Comment O-LS-10

The commenter alleges that neither project-level nor cumulative air quality impacts on Sequoia High School are adequately addressed in the Draft SEIR.

Response O-LS-10

Chapter 12, Air Quality, and Chapter 17, Cumulative Impacts (Section 17.2.9, Air Quality) discuss project-level and cumulative air quality impacts, respectively, that would result from development that could occur under the proposed Transit District DTPP Amendments. As summarized below, the Draft SEIR adequately assessed the potential air quality impacts that could occur as a result of the proposed Transit District DTPP Amendments.

The air quality analysis identifies Sequoia High School as a sensitive receptor located approximately 600 feet from the Transit District area. Air emissions from construction and operation of development that could occur with the proposed Transit District DTPP Amendments would have the potential to affect Sequoia High School. As discussed under Impact AQ-3 on pp. 12-37 through 12-40 of the Draft SEIR, developments could generate Toxic Air Contaminants (TACs), primarily Diesel Particulate Matter (DPM), during construction and operation. DPM emissions would be generated from the combustion of diesel fuel in construction equipment and heavy-duty trucks transporting materials and equipment to and from individual project sites. The likely sources of operational TAC emissions would be any proposed emergency generators

(required for residential structures over 75-feet) and truck traffic serving the commercial uses in the Transit District area.

Per its Policy and Procedure Manual, the Bay Area Air Quality Management District (BAAQMD) would deny an Authority to Construct or a Permit to Operate for any new or modified source of TACs that exceeds a cancer risk of 10 in one million or a chronic or acute Hazard Index of 1.0, the BAAQMD's thresholds for health risk impacts. Therefore, operation-generated air emissions were found to result in less-than-significant impacts to sensitive receptors (including Sequoia High School). Construction impacts, however, were found to be potentially significant with respect to health risks to sensitive receptors; however, implementation of Mitigation Measure AQ-3: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction, would reduce this impact to a less-than-significant level. Further quantification cannot be done at this time due to the programmatic nature of this Draft SEIR and the lack of definition of specific developments that may occur with the proposed Transit District DTPP Amendments; however, the mitigation noted above would be sufficient to reduce the potential impact of any specific project that might be developed with the proposed Transit District DTPP Amendments to a less-than-significant level.

Cumulative air quality impacts related to sensitive receptors are discussed under Impact C-AQ-2 on p. 17-25 of the Draft SEIR. Similar to the project-level analysis summarized above, the Draft SEIR concluded that cumulative impacts would be less than significant with implementation of Mitigation Measure AQ-3.

Comment O-LS-11

The commenter alleges that neither project-level nor cumulative noise impacts on Sequoia High School are adequately addressed in the Draft SEIR.

Response O-LS-11

Chapter 11, Noise and Vibration, and Chapter 17, Cumulative Impacts (Section 17.2.8, Noise and Vibration) discuss project-level and cumulative noise impacts, respectively, that would result from development that could occur under the proposed Transit District DTPP Amendments. However, as summarized below, the Draft SEIR adequately assessed the potential noise impacts that could occur as a result of the proposed Transit District DTPP Amendments.

The noise analysis identified Sequoia High School as a sensitive receptor located approximately 600 feet from the Transit District area. As discussed under Impact NO-1 on pp. 11-19 through 11-21 of the Draft SEIR, developments could generate temporary increases in ambient noise levels that would affect sensitive receptors during demolition and construction activities. As discussed under Impact NO-2 on pp. 11-21 through 11-24, operational stationary source (e.g., mechanical equipment on buildings, commercial activity adjacent to/above residential uses) and traffic noise resulting from proposed changes in vehicular circulation within the Transit District area could also affect sensitive receptors.

The Draft SEIR concluded that demolition and construction activities could result in a potentially significant impact. However, with implementation of Mitigation Measure NO-1: Construction

Noise Reduction, and the requirement to meet the City's conditions of approval that relate to noise and vibration reductions/ standards, the impact would be reduced to a less-than-significant level. Because the specific, type size, and locations of mechanical equipment associated with development within the Transit District area are unknown, the Draft SEIR concluded that permanent (i.e., operation) increases in ambient noise could result in a potentially significant impact due to the introduction of new mechanical equipment. However, this impact would be reduced to a less-than-significant level with implementation of Mitigation Measure NO-2: Operational Noise Performance Standard. As shown in Table 11-7 on Draft SEIR p. 11-24, increases of up to 1.2 dBA in noise levels would occur on roadways in and around the Transit District area, including roadways adjacent to Sequoia High School, attributable to development that could occur under the proposed Transit District DTPP Amendments. This is below the significance criterion of 3 dBA or 5 dBA, depending on the existing noise level.

Further quantification as to specific types of potential noise sources or impacts cannot be done at this time due to the programmatic nature of this Draft SEIR and the lack of definition of specific developments that may occur in the proposed Transit District; however, the mitigation and compliance with the City's conditions of approval noted above would be sufficient to reduce the potential impact of any specific project that might be developed with the proposed Transit District DTPP Amendments to a less-than-significant level.

Cumulative noise impacts related to sensitive receptors are discussed under Impact C-NO-1 on pp. 17-21 through 17-23 of the Draft SEIR. Project-generated vehicular traffic would increase traffic noise along the 14 modeled roadway segments would be less than 3 dBA except along two roadway segments. Some segments would experience a decrease in noise from traffic being redistributed as a result of new roadway connections. A cumulative roadway noise impact is predicted to occur along Maple Street from El Camino Real to Main Street (an increase of 4.3 dBA) and along Brewster Avenue from Broadway to El Camino Real (an increase of 7.2 dBA). However, when compared to the 2040 cumulative baseline condition without the proposed Transit District DTPP Amendments, the noise levels along both these roadways are predicted to decrease as traffic would be redistributed as a result of new roadway connections within the Transit District area. The traffic noise associated with the proposed Transit District DTPP Amendments would not represent a cumulatively considerable contribution to this cumulative impact and would, in fact, serve to reduce this predicted significant cumulative impact.

Comment O-LS-12

The commenter requests that additional detail be provided in the Draft SEIR regarding the impact of population growth on SUHSD facilities.

Response O-LS-12

The concerns highlighted in this comment are addressed in response to Comment O-LS-7, above. See also response to Comment O-LS-8 regarding the Draft SEIR's consideration of cumulative effects.

Comment O-LS-13

The commenter alleges that mitigation measures and project alternatives are not adequate to reduce impacts of the proposed Transit District DTPP Amendments to schools to a less than significant level.

Response O-LS-13

Please see response to comment O-LS-7. State law establishes “the exclusive methods of considering and mitigating impacts on school facilities that occur or might occur” as a result of the City’s approval of the project. See Government Code section 65996(a).

The indirect construction and operation effects to students, families, and employees of the SUHSD in the vicinity of the Transit District area, identified by the commenter as “school-related impacts,” would be less than significant with mitigation, where applicable, and would not warrant new mitigation measures under CEQA. The City can impose conditions of approval to address other concerns through its standard project review processes, but they would be separate from mitigation measures required under CEQA.

The project alternatives, as described in Chapter 19, *Alternatives to the Proposed Project* (as revised herein) more than adequately analyze a range of alternatives that may reduce the potential impacts noted by the comment. One of the project alternatives (Alternative 2: Reduced Development) would involve less residential development than the proposed Transit District DTPP Amendments, and consequently, would generate less public student enrollment and resultant demand for additional public school facilities than the proposed Transit District amendments. Similar to the proposed project, the payment of school impact fees under Section 65996 would apply to Alternative 2, Alternative 3, which would include more residential units than would the proposed Transit District amendments, and Alternative 4, which would include the same number of residential units as the proposed Transit District DTPP amendments; these impact fees would constitute full and complete mitigation of school impacts from development under any of the three alternatives, as is the case for the proposed project. In addition, similar to the proposed project, any additional facilities that may be required to accommodate increased the increased population from these alternatives would be required to undergo CEQA review if and when they were to be proposed and constructed. Given these factors, impacts to public schools from these project alternatives, would similarly be less than significant.

Also, since the overall development density associated with the majority of the project alternatives would also be less than the proposed Transit District, the range of environmental effects associated with the construction and operation of this new development on public schools in the project vicinity under these alternatives would be similar to or less than that of the proposed Transit District, and similarly, mitigated to the extent feasible.

Comment O-LS-14

The commenter states that the City should coordinate with SUHSD to develop alternative mitigation measures that would assure there are adequate school facilities available to serve new students that would be generated by development that could occur under the proposed Transit District DTPP Amendments.

Response O-LS-14

As discussed in the responses above, based on the analysis in the Draft SEIR, project applicants of development projects that could occur under the proposed Transit District DTPP Amendments would be required to pay SB 50 fees that would, as a matter of law, be sufficient mitigation for the project's direct impact on school facility overcrowding pursuant to Government Code Section 65596. The indirect construction and operation effects to students, families, and employees of the SUHSD in the vicinity of the Transit District area, identified by the commenter as "school-related impacts," would be less than significant with mitigation, where applicable, and would not warrant new mitigation measures under CEQA.

Comment O-LS-15

The commenter introduces a possible alternative mitigation measure to address impacts to SUHSD facilities. However, as indicated in the responses above, the Draft SEIR concluded that payment of the required SB 50 fees would, as a matter of law, be sufficient mitigation for the project's direct impact on school facility overcrowding pursuant to Government Code Section 65596. The indirect construction and operation effects to students, families, and employees of the SUHSD in the vicinity of the Transit District area, identified by the commenter as "school-related impacts," would be less than significant with mitigation where described and would not warrant new mitigation measures under CEQA.

Response O-LS-15

The City looks forward to discussing the idea of land dedications for future school facilities more broadly in future "2+2+2" meetings.

Comment O-LS-16

The commenter introduces a possible alternative mitigation measure to address impacts to SUHSD facilities. However, as indicated in the responses above, the Draft SEIR concluded that payment of the required SB 50 fees would, as a matter of law, be sufficient mitigation for the project's direct impact on school facility overcrowding pursuant to Government Code Section 65596. The indirect construction and operation effects to students, families, and employees of the SUHSD in the vicinity of the Transit District area, identified by the commenter as "school-related impacts," would be less than significant with mitigation where described and would not warrant new mitigation measures under CEQA.

Response O-LS-16

The City looks forward to discussing the idea of how development phasing could be better aligned with existing and future expanded/new school facilities in future "2+2+2" meetings. Please also see response to Comment O-LS-12, above.

Comment O-LS-17

The commenter summarizes their previous comments in this conclusory statement.

Response O-LS-17

No new concerns are introduced in this comment that have not already been addressed in the responses above. No further response is required.



Lindy Chan
Principal Planner
City of Redwood City
650-780-7237
lchan@redwoodcity.org

Re: Comments on the Redwood City Transit District DTPP Amendments Subsequent Environmental Impact Report (State Clearinghouse No. 2021080554)

Dear Ms. Chan,

Lowe and Eden Housing have reviewed the Draft Subsequent Environmental Impact Report (DSEIR) for the Redwood City Transit District DTPP Amendments (DTPP Amendments). As you know, Lowe and Eden Housing are working to redevelop Sequoia Station, which is within the Transit District boundaries.

1

Lowe and Eden Housing support the proposed DTPP Amendments, which envision creating an approximately 16.6-acre Transit District subarea within the DTPP area focused on transit-oriented, mixed-use development adjacent to the Redwood City Transit Center. Beyond just the development within the boundaries of the Transit District, these amendments also contemplate how to provide space for the expansion of Caltrain, which will benefit both Redwood City and the region by increasing Caltrain's right-of-way and capacity, reducing carbon emissions, and creating stronger citywide connections through grade separation.

2

Evolving market demands often challenge long-range planning efforts, and the comments below intend to bolster the ability to attract a wider, more diverse and vibrant mix of residential, office, and other non-residential uses within the Transit District. The comments below focus on how the DSEIR can successfully respond to these evolving market demands, which may impact future development and tenants within the Transit District.

3

Comment #1: Authorize "Research and Development / Laboratory Type" Land Use with a CUP

The DTPP currently authorizes "research & development offices" but not "research and development laboratory" as an allowable land use. The City's Zoning Code defines "research and development, office" as a "research and development use for which the research and development components primarily occur in an office setting, with minimal laboratory area or research equipment."

4

To facilitate the ability to attract potential life science tenants and investors in response to the growing market demand for life science space, Lowe proposes that the City identify "research and development laboratory" use as allowed use within the Transit District subject to the City's Conditional Use Permit requirements. This adjustment would only permit future applications for life science tenants to be submitted for consideration. These applications would be subject to new CEQA review and only be considered for a CUP after environmental review is completed.



Comment #2: Lowe Commits to Use Tier 4 Final Diesel Construction Equipment

Lowe and Eden note that using conservative (*i.e.*, high-side) assumptions, the DSEIR identifies a potentially significant health risk impact from Transit District construction at a residential building just south of the Sequoia Station site. The DSEIR then identifies Mitigation Measure AQ-2b, which would mitigate this impact to a less-than-significant level.

Mitigation Measure AQ-2b identifies the following construction emission reduction measures: 1) use electric construction equipment when feasible; 2) use Tier 4 Final construction equipment; and 3) require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations.

Lowe and Eden are happy to share that we are committed to implementing all three construction emission reduction measures identified under Mitigation Measure AQ-2b, including the use of Tier 4 Final construction equipment. As outlined in the DESIR, implementation of these construction emission reduction measures will reduce any potential significant air quality impact adjacent to Sequoia Station to well below the City's and BAAQMD's threshold of significance.

5

Comment #3: Lowe Supports the City's Continued Implementation of its September 2020 Reach Code Restricting Natural Gas Connections in New Buildings

The City's September 2020 Reach Code prohibits natural gas connections for the vast majority of new buildings in the City. The Reach Code includes carefully considered exceptions that allow natural gas connections for certain uses, including accessory dwelling units, non-residential buildings constructed to Office of Statewide Health Planning and Development Hospital standards, factories/industrial buildings, high-hazard buildings, scientific laboratory areas, commercial kitchens, and new residential structures that designate 100 percent of the dwelling units to be affordable. Lowe and Eden Housing have determined that their 100-percent affordable residential building can be all-electric and is unlikely to take advantage of the Reach Code's exception for affordable housing. However, it is Lowe's experience that all-electric commercial kitchens are not currently feasible, and therefore encourages the City to continue to apply its Reach Code exception, rather than impose any mitigation measures that would prohibit Transit District projects from relying on the Reach Code. We agree with all the reasons that the City created an exception for commercial kitchens in their Reach Code -- including that high-quality restaurants will find other markets that will permit natural gas outside of Redwood City, putting Redwood City at a competitive disadvantage to other markets.

6

Comment #4: The Transit District will be Consistent with the City's November 2020 Climate Action Plan

The DSEIR states that because the City's Reach Code allows natural gas connections to some new buildings, continued application of the Reach Code would mean the proposed DTPP Amendments do not comply with BAAQMD's newly adopted GHG thresholds. However, the BAAQMD thresholds also consider a project or a plan to cause a less-than-significant GHG impact if the project or plan is consistent with a local GHG reduction strategy that meets certain CEQA standards. The City's 2020 Climate Action Plan (CAP) is just such a plan. Most notably, building on the success of its 2013 CAP, the 2020 CAP identifies specific, quantified measures

7



that will reduce the City's GHG emissions by 40% (compared to 2005 levels) by 2030 and will place Redwood City on the path to carbon neutrality by 2045. Because the DTPP Amendments are fully consistent with the 2020 CAP, we recommend that the Final SEIR take credit for this consistency and determine that the DTPP Amendments would not cause a significant GHG impact.

↑
7 cont.

Comment #5: The Transit District Will Support Recycled Water Use

Development in the Transit District will require the expansion of the recycled water line. This expansion is a significant asset that will decrease potable water consumption. Further, this "purple pipe" will not only benefit the Transit District, but also future downtown developments. Future proposed developments, such as AutoZone or Gatekeeper projects, would be able to connect to this expansion line and significantly decrease their potable water usage.

↑
8

Lowe and Eden appreciate the City's consideration of its comments on the DSEIR. We support the City's proposed vision in the DTPP Amendments and looks forward to working with the City and other stakeholders in advancing the goals and objectives of the Transit District subarea.

↑
9

Sincerely,

Lowe

Eden Housing

Alan Chamorro
Executive Vice President

Andrea Osgood
Vice President of Real Estate Development

Responses to Comments from Lowe and Eden Housing – undated

Comment O-LEH-1

The commenter indicates Lowe and Eden Housing are working to redevelop Sequoia Station, located within the Transit District boundaries.

Response O-LEH-2

The comment is noted and no response is required.

Comment O-LEH-2

The commenter indicates support for the proposed DTPP Amendments, and acknowledges certain project objectives and aspects.

Response O-LEH-2

These comments are noted; no response is required.

Comment O-LEH-3

The commenter provides an introductory preface to the comments that follow in the comment letter; no response is required.

Response O-LEH-3

Responses to individual comments are provided below; no response is required to these introductory remarks. Please also note that the Draft SEIR does not – contrary to what the commenter suggests – respond to evolving market demands. Rather, the EIR serves as a public information document to disclose and mitigate the significant environmental impacts of the project as proposed, and present feasible alternatives to the project that may reduce or avoid significant impacts.

Comment O-LEH-4

The commenter requests “research and development / laboratory type” to be an allowable land use with a conditional use permit in the Transit District area.

Response O-LEH-4

The comment is noted. City staff has determined not to modify the conditional uses to include R&D (laboratory) at this time. In the event a project requests a DTPP amendment to allow it in the future, CEQA review would be completed for such an amendment at that time.

Comment O-LEH-5

The commenter notes that the Draft SEIR identified Mitigation Measure 2b, which included 1) use of electric construction equipment when feasible, 2) use of Tier 4 Final construction equipment, and 3) require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations. The

commenter indicates Lowe / Eden Housing is committed to implementing each of these measures to reduce potentially significant construction-related health risks to a less than significant level.

Response O-LEH-5

These comments are noted; no response is required.

Comment O-LEH-6

The commenter indicates that Lowe / Eden Housing have determined that while their proposed 100-percent affordable residential building can be all-electric, all-electric commercial kitchens are not currently feasible. As a result, the commenter encourages the City to continue to apply the exception in the Reach Codes for commercial kitchens.

Response O-LEH-6

Please refer to response to Comment O-CSMC2-5. The Draft SEIR acknowledged that while Mitigation Measure CC-1 would disallow the Reach Code exceptions within the Transit District area, this mitigation measure may not be feasible for economic or other reasons. The Draft SEIR further noted that restaurant industry professionals had expressed concern about the current heat limitations of all-electric commercial cooking equipment and potential increased costs, particularly in light of the effect that the COVID-19 pandemic has had on the restaurant industry. The Draft SEIR concluded that since this Mitigation Measure CC-1 may not be feasible, the impact was conservatively determined to be significant and unavoidable in the Draft SEIR.

Since the Draft SEIR contemplated that some projects would not be able to comply with the all-electric requirements of the Reach Codes, minor staff-initiated revisions were made to Mitigation Measure CC-1 in Chapter 2, Revisions to the Draft SEIR, in this Response to Comments document to clarify that projects within the Transit District may obtain exceptions to the Reach Code's all-electric requirements if those exceptions exist in the Reach Code in effect at the time a building permit application is filed.

Comment O-LEH-7

The commenter indicates that despite the Draft SEIR's conclusion that continued application of the City's Reach Codes, which allow natural gas connections to some new buildings, would mean the proposed DTPP Amendments would not comply with BAAQMD's newly adopted GHG thresholds, BAAQMD thresholds consider a project or plan to cause a less than significant GHG impact if the project is consistent with a local GHG reduction strategy that meets certain CEQA standards, such as the City's 2020 CAP. The commenter recommends that because the proposed DTPP Amendments are fully consistent with the City's 2020 CAP, the Final SEIR should take credit for this consistency and determine that the proposed DTPP Amendments would not cause a significant GHG impact.

Response O-LEH-7

The Draft SEIR presents two distinct significance criteria and associated methodologies to address the respective issues raised by the commenter in this comment. With respect to the first criterion (generation of GHG emissions), as discussed in detail on Draft SEIR pages 13-28 to 13-

31, a significant impact would occur if development allowed under the proposed Transit District Amendments would not incorporate the following performance standards adopted by the BAAQMD: 1) No natural gas to all projects proposed for development within the Transit District area; 2) Avoid wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines; 3) Compliance with EV requirements in the most recently adopted version of CALGreen Tier 2; and 4) Consistency with the SB 743 target of at least 15 percent reduction in VMT per capita below regional average. For the reasons discussed in Impact GHG-1 summarized in Response O-LEH-6, above, such mitigation is identified to be implemented but the project may still have a significant and unavoidable impact on generation of GHG emissions.

With respect to the second criterion (conflict with applicable plan, policy or regulation adopted to reduce GHG emissions), as discussed in detail on Draft SEIR page 13-31, a significant GHG impact would occur if development allowed under the proposed Transit District Amendments conflicted with CARB's 2017 Scoping Plan Update, SB 32 and E-3-05, Plan Bay Area 2040, the City of Redwood City Climate Action Plan, and the CALGreen Code and City Green Building Codes. Per the analysis in Impact GHG-2, the project would be consistent with these documents, and as a result, the impact would be less than significant.

Accordingly, while it is acknowledged that the DTPP Amendments are consistent with the City's 2020 CAP, using the applicable methodologies and significance criterion, this circumstance does not offset or avoid the potential significant impact of generation of GHG emissions upon implementation of the Transit District DTPP Amendments and development thereunder.

Comment O-LEH-8

The commenter indicates the development of the Transit District will require the expansion of the recycled water line; and that the recycled water line would benefit the Transit District and future downtown development, thereby decreasing potable water demand.

Response O-LEH-8

The comments are noted. The proposed Transit District DTPP Amendments' effect on water supply sufficiency are addressed in the Draft SEIR, Chapter 10 Utilities and Infrastructure, Hydrology and Water Quality, Impact UT-2. Implementation of Mitigation Measure UT-2 will require subsequent development to install recycled water infrastructure with sufficient recycled water capacity to provide for the project's recycled water demands and meet applicable City of Redwood City standards, ensuring Transit District impact on water sufficiency would be mitigated to a less than significant level.

Comment O-LEH-9

The commenter expresses support of the Transit District DTPP Amendments and to working with the City and other stakeholders in advancing the goals and objectives of the Transit District area.

Response O-LEH-9

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

3.2.3 Draft SEIR Comment Letters – Individuals

Comment Letter I-Bloomquist

From: Cary Bloomquist
Sent: Saturday, May 14, 2022 10:04:57 AM
To: Council-Giselle Hale <ghale@redwoodcity.org>
Subject: EIR comments

You don't often get email from cbloomquist30@gmail.com. [Learn why this is important](#)

Ms. Hale,

I reviewed the Redwood City Transit District DTPP Amendments Subsequent Environmental Impact Report. I was surprised the City is considering taking on a project of this scope given the delicate economy, skyrocketing inflation, and most importantly, the 20 year drought we are suffering from, with no end in sight.

Regardless of all other aspects and considerations in the EIR document, we simply do not have the water to engage in any new developments. We should not support or encourage growth of any kind, we simply do not have the infrastructure to support it nor the natural resources (water) to sustain it.

As a third generation native of Redwood City, I have observed a grotesque transformation of my City from a bedroom community to something that looks like an extension of San Francisco, with tall, dense buildings creating urban canyons with long shadows...not very pleasant to walk around Redwood City, especially when compared to intelligently developed communities like Cupertino, Saratoga, San Carlos, Burlingame...to name a few.

Please do not lend your support to this or any new developments until we have mitigated the water crisis. As you know, we are in the driest period in over 1,200 years, and it's very likely with climate change, this condition will not only continue, but will worsen. Please think about the future of our children and grandchildren.

Thank you for your consideration of my opinion.

Mr. Cary Bloomquist

Responses to Comments from Cary Bloomquist – May 14, 2022 Letter

Comment I-Bloomquist-1

The commenter expresses surprise that the City is pursuing the proposed Redwood City Transit District DTPP Amendments in light of the state of the economy and inflation. The commenter also raises concern for the project in light of drought conditions and the effects associated with the additional development in Redwood City, including the creation of urban canyons and increased shadows, as compared to development in other cities on the Peninsula. Lastly, the commenter also expresses some personal opinions about the proposed Transit District DTPP Amendments' effect on quality of life issues.

Response I-Bloomquist-1

As discussed in Section 3.2 in this Response to Comments document, CEQA does not require that substantive responses be provided for comments that do not address the adequacy or accuracy of the environmental analysis in the Draft SEIR or that do not raise a significant environmental issue. Furthermore, economic and social effects of a proposed project by themselves are not considered to be significant impacts, and are relevant only insofar as they may serve as a link in a chain of cause and effect and may connect the project with a physical environmental impacts, or they may be part of the factors considered in determining the significance of a physical effect.

Concerning drought conditions, the commenter is referred to Impact UT-2 in the Draft SEIR Chapter 10, Utilities and Infrastructure, Hydrology and Water Quality, which addresses the availability of water supplies to serve the Redwood City Transit District DTPP Amendments and reasonably foreseeable future development under normal, dry and multiple dry years. Impact UT-2 summarized the results of a Water Supply Assessment (WSA) prepared in support of the Draft SEIR for the proposed Transit District DTPP Amendments, per the requirements of SB 610. The WSA considered both potable and recycled water uses in the project water projections. The WSA assumed the City would implement water use limitations under drought conditions per its Water Shortage Contingency Plan (WSCP), which includes a suite of water demand reduction measures. The WSA also analyzed two study scenarios, one assuming the Bay Delta Plan amendment is implemented, and one assuming the Bay Delta Plan Amendment is not implemented. As reported in Impact UT-2, the Draft SEIR determines that with implementation of Mitigation Measure UT-2: Recycled Water Infrastructure, the project's effect on water sufficiency during normal and drought year conditions would be less than significant. Moreover, projects developed within the Transit District area would be required to comply with the CALGreen Code, which requires that new construction use high-efficiency plumbing fixtures; and compliance with the Redwood City Municipal Code Section 38.52 which requires all new and existing commercial properties and new multi-family residential properties to use recycled water for irrigation. Implementation of water conservation and efficiency measures and use of recycled water would further minimize the potable water demand generated by the proposed Transit District DTPP Amendments.

Project aesthetic and shadow effects associated with the Redwood City Transit District DTPP Amendments were addressed in Chapter 6, Aesthetics and Shadows, in the Draft SEIR. As demonstrated in Draft SEIR Impacts AE-1 and AE-2, the proposed Transit District DTPP Amendments would not result in a significant impact on scenic vistas or substantially damage

scenic resources. In addition, as shown in Impact AE-3, with the proposed amendments to the DTPP, the project would not conflict with applicable zoning and other regulations governing scenic quality, including the Redwood City General Plan and Zoning Code. No changes to maximum allowable building height limits within the Transit District area would occur under the Transit District DTPP Amendments. Furthermore, as demonstrated in Draft SEIR Impact AE-5, implementation of the proposed Transit District DTPP Amendments would not cast shadows that would substantially impair the beneficial use, important values, or livability of any shadow-sensitive use, including public parks, plazas or open space areas; buildings using passive solar heat collection or solar collectors; historic resources with a shadow-sensitive character-defining feature; or shadow-sensitive portions of residential parcels. Also, as addressed in Section 17.2.3, Aesthetics and Visual Resources, implementation of the proposed Transit District DTPP Amendments in combination with cumulative development, would not result in significant aesthetic and shadow effects.

Potential effects of a proposed project on the quality of life and related conditions, in and of themselves are not considered environmental impacts under CEQA.³

³ San Franciscans for Reasonable Growth v. City and County of San Francisco (1989) 209 Cal.App.3d 1502.

Subject: FW: Comments: Transit District Draft Amendments

From: Claire Felong
Sent: Sunday, May 22, 2022 6:22 PM
To: CD-Lindy Chan <lchan@redwoodcity.org>
Subject: Comments: Transit District Draft Amendments

Lindy,
Some comments on the Draft

Sec 1.2.1 GOALS AND GUIDING PRINCIPLES

"...seamlessly connected to Broadway, Courthouse Square, El Camino Real and adjacent neighborhoods. It is intended that the transit station be so well integrated into the activity patterns, viewsheds, and pathways of the district that the train **transit** becomes the primary mode of transportation chosen by the daytime and evening commuting populations within walking distance of the station transit center."

Comment: The word "transit" used instead of "train" is very confusing: Is it referring to a space entered after departing a train? Is it referring to the "Transit Station"? Is it referring to multiple modes of transit (train, shuttles, bikes & streetcars? Please clarify.

"In addition, transportation choices, such as shuttles and micromobility devices, ~~modern streetcars~~ are envisioned as a means of convenient circulation within Downtown, as well as a way to connect Downtown and the Caltrain station Transit Center to adjacent districts and transit hubs."

Comment: What the heck are micro mobility devices and why are we not considering streetcars or shuttles. If they are one and the same, please use terms that average citizens are familiar with (& use fewer syllables)

Sec. 2.4.2 – GENERAL PUBLIC FRONTAGE REGULATIONS

General Comment: Not seeing any requirement for swales or other permeable surfaces for natural drainage nor how Redwood Creek should be restored to a more natural riverwalk.

Thank you for your consideration,
Claire Felong

1

Responses to Comments from Claire Felong – May 22, 2022 Letter

Comment I-Felong-1

The commenter provides excerpts from Section 1.2.1 – Goals and Guiding Principles, Goal H; and Section 2.4.2 – General Public Frontage Regulations, in the City’s Transit District Draft Amendments document, and comments on these excerpts.

Response I-Felong-1

Please note that the excerpted text is from the DTPP and is not included in the Draft SEIR for the proposed Redwood City Transit District DTPP Amendments; as such, no response is required. However, the comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment Letter I-Mansfield

Subject: FW: Transit District - note of support

From: Jason Mansfield

Sent: Tuesday, June 07, 2022 1:54 PM

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

Subject: Transit District - note of support

Dear Council, Planning Commission, and City Staff,

Just a quick note to express my support for the Transit District, including the EIR and all subsequent efforts toward the related improvements. I express this support not only as a local engineer who did work on the early grade separation studies, but also as a nearby resident, a community leader, and as leadership in a significant and historic Redwood City employer. The improvements envisioned for the Transit District, and supported by this EIR, would certainly add value and improve many aspects of all those hats that I wear. Great visionary job advancing this planning effort so far!

Thanks,
Jason

JASON MANSFIELD, PE

Associate



BKF ENGINEERS Delivering Inspired Infrastructure®

255 Shoreline Drive, Suite 200, Redwood City, CA 94065

d 650.482.6422 jmansfield@bkf.com BKf.com

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Responses to Comments from Jason Mansfield – June 7, 2022 Letter

Comment I-Mansfield-1

The commenter expresses support for the Transit District, and commends the Council, Planning Commission and City staff for advancing the planning effort forward.

Response I-Mansfield-1

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment Letter I-Zambrano

Subject: FW: Transit District Public Comment

On Jun 10, 2022, at 4:31 PM, Diego Zambrano <dazambranoz@gmail.com> wrote:

Hi,

I'm a Stanford Law School professor, proud Latino resident of Redwood City, and a homeowner who is planning to start a family here soon. I strongly and vehemently support the creation of the Transit District and the Sequoia station project. Increasing density around a Caltrain station is a no-brainer. **First** on the environmental side: We know from a wealth of studies that increasing density lowers carbon emissions and helps fight climate change. By allowing riders to live near the station, a dense transit district would strike a blow against car usage and carbon generation. Switching from a personal car to mass transit is one of the best things people can do to reduce their carbon emissions. Building more housing makes that easier, and it's a large part of the reason that pro-housing policies are also climate policies. The current use of the Sequoia station represents a ridiculous misuse of a key piece of land. Its mostly a parking lot right now. That is an environmental problem not something to preserve. For the sake of the environment, create the Transit District and allow the Station project to move forward. **Second** on the housing affordability side: there is a massive housing shortage in California. We need more housing construction immediately. Study and after study shows that building more housing (market rate or otherwise) lowers rents and makes homes affordable. **Third** on the economic growth and innovation side: current regulations are a huge impediment to economic growth and innovation. A transit district should quickly allow the Sequoia station project to start construction ASAP and would create a research hub in the heart of Redwood City. A study by economists Chang-Tai Hsieh of the University of Chicago and Enrico Moretti of Stanford found that If land use regulations in New York and the Bay Area were set equal to the median U.S. city, GDP would be nearly 10 percent higher translating into an additional \$8,775 in average wages for all American workers. **Fourth** the office buildings would provide ready-made customers for our struggling downtown restaurants and shops that we all love. **Fifth** a transit district would *reduce* displacement of Redwood City communities. NIMBY's fail to understand this — building more housing actually **REDUCES** displacement of existing communities. When looking at the actual impact of building more homes, a recent paper from UC Berkeley found that building more homes is one of the top strategies to *prevent displacement* because it absorbs new people moving to the area and allows existing people to keep their homes. **Sixth** a transit district would make Redwood City a cosmopolitan paradise and a vibrant place to live. What's there not to like? More restaurants, more people from around the world moving here, more diversity of jobs, etc. It's a no brainer.

I strongly urge the Planning Commission to move forward immediately. Stop dragging this out. Let the Sequoia station construction project begin. NOW. Not in three years. We need the housing. We need the density to fight climate change. Do not use over broad environmental regulations to stop a project that would actually strike a blow against climate change. Move forward faster!

Best,

Diego A. Zambrano

Responses to Comments from Diego A. Zambrano – June 10, 2022 Letter

Comment I-Zambrano-1

The commenter expresses support for the creation of the Transit District and the Sequoia Station project. The commenter also lists a number of benefits of the proposed project, including the project's ability to 1) reduce carbon emissions by providing housing near transit, 2) provide affordable housing, 3) streamline the implementation of the Sequoia Station project, 4) provide daytime population from the proposed office uses to stimulate downtown retail uses, 5) reduce the potential for displacement of housing in existing residential communities through the proposed infill development, and 6) provide a cosmopolitan and vibrant setting to live.

Response I-Zambrano-1

The endorsement and comments made are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment Letter I-Molony

TO: Planning Commission
City of Redwood City

6/14/22

Copy: Lindy Chan, Planning Dept
City Councilmembers
Chamber of Commerce

FM: Clem Molony
1966 Menalto Ave.
Menlo Park, CA 94025

SUB: Transit District - Draft SEIR

Proposed Amendments to DTPP and General Plan, to create
a new transit district focused on transit-oriented development.

The SEIR objectives include to inform the general public, decision makers, and affected agencies of the expected environmental impacts of the proposed transit district.

Comments:

I strongly support this transit district which will put in place the infrastructure to greatly expand the use of transit in and around Redwood City.

#1 As a 40-year environmental manager in Silicon Valley, I have learned that transit-oriented development is a key component in the reduction of energy waste, pollution, and greenhouse gases which are caused by cars.

#2 In addition, by substantially improving transit systems, you will incent this and future generations to integrate transit into their daily lives.

#3 Finally, the new transit district will install a long-term infrastructure piece in Redwood City. This investment will empower future smart-growth development, and a healthier future for Redwood City citizens and businesses.

Thank you to the Planning Commission and staff for your diligent evaluative work over the past 2-3 years to initiate and research this project and SEIR, and to plan so wisely for the future of Redwood City and neighboring communities on the San Francisco Peninsula.

Responses to Comments from Clem Molony – June 14, 2022 Letter

Comment I-Molony-1

The commenter expresses support for the proposed Transit District. The commenter adds that 1) transit-oriented development is a key component to reduce energy waste, pollution, and greenhouses gases from vehicles; 2) the proposed project would incentivize integration of transit into peoples' lives by improving transit systems; and 3) the proposed project would install long-term infrastructure that would empower smart-growth development. The commenter also commends the Planning Commission and staff for their work on the project and SEIR.

Response I-Molony-1

The endorsement and comments made are noted, and will be forwarded to the City decisionmakers for their consideration.

June 14, 2022

Planning Commission
City Council

RE: Downtown Precise Plan (DTPP); Parking requirements for Sequoia Station; Mitigation of impact of traffic on James Avenue.

Parking Requirements for Sequoia Station

While I do not object to the proposed changes and improvements to the Transit District/Sequoia Station, the parking plan proposes to push the overflow parking onto the streets surrounding the train station and Sequoia Station.

Failure to provide adequate parking for the residents of Sequoia Station, the offices, for the users of the Transit Station who do not live at Sequoia Station, Safeway and other retail, and the office workers will adversely impact the residents of the area surrounding Sequoia Station. It will reduce the amount of on street parking available to the residents. Already many of the homes in the surrounding area do not have adequate on-site parking, primarily due to the age of the homes many of which have one car garages.

The Draft EIR refers "to lower the parking requirement to reflect anticipated reduced future parking demand." This is a flawed logic. It is a fallacy to think those persons living and using Sequoia station will not be using personal cars. Even San Francisco, which has an extensive public transit system, has 1.75 cars per household.

It is reasonable to assume most couples occupying the apartments in Sequoia Station will each have a car. Unrelated people sharing an apartment because of the high rents will more than likely each have a car.

Changing employment dynamics will lead to more cars. For example, someone rents an apartment at Sequoia Station because it is on the transit corridor providing convenient access to the train and to their place of employment. What happens if they later take employment in Los Gatos? If they don't already own a car, they will buy one.

Providing a fee as per the Draft EIR (".....ability for project applicants to pay a fee to the city in lieu of providing new parking spaces.....") to the city will not mitigate the impact on the residents surrounding Sequoia Station. Any mitigation plan must reduce the parking impact on the surrounding residents. This may include a commitment on the developer ("project applicant") to build additional parking near Sequoia Station or provide additional parking to the residents of the surrounding area in the event the average number of cars at Sequoia Station exceeds available parking.

The improvements in the Transit District/Sequoia Station should include the following minimum requirements for parking:

2 spaces per residential unit plus,
adequate parking for Safeway, and other retail customers plus,
adequate parking for workers in the offices plus,
adequate parking for non-residents of Sequoia Station using the train station.

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Comment Letter I-Schuch

June 14, 2022

Planning Commission
City Council

In addition, all parking for the residents must include ample provisions for electric car charging.

↑ 3 cont.

James Street Traffic

Steps must be taken to mitigate traffic on James Avenue resulting from the development of the Transit District/Sequoia Station. Access to Sequoia Station to cars from James Avenue should be limited to cars using the Transit Station and not the offices, retail, and residences. Because of the many schools on or near James (Sequoia High School, Mt Carmel, Redeemer Lutheran, Egypt Coptic, McKinley, North Star Academy) traffic is already heavy during peak hours. The added volume of cars resulting from the new residences and offices at Sequoia Station will lead to total gridlock.

4

Thank you for your consideration of this matter.

Sincerely,



Clifford Schuch
327 Hudson Street
Redwood City, CA 94062

Responses to Comments from Clifford Schuch – June 14, 2022 Letter

Comment I-Schuch-1

The commenter indicates that the Transit District/Sequoia Station parking plan proposes to push overflow parking onto the streets surrounding the train station and Sequoia Station. The commenter asserts that failure to provide adequate parking for the residents, employees and patrons of the project would adversely affect the residents of the area surrounding Sequoia Station. The commenter indicates many of the homes in the surrounding area of the project do not have adequate on-site parking, due to their age. The commenter also indicates it is flawed logic in the Draft EIR to assume persons living in and using Sequoia Station would not use their personal cars.

Response I-Schuch-1

The proposed Transit District meets the criteria of Public Resources Code Section 21099(d) which states that parking impacts of an employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment. Furthermore, impacts on parking are not included in the CEQA Appendix G checklist for transportation. Accordingly, CEQA does not require that a project's effect on parking be analyzed. (See also Pub. Res. Code section 21099(b)(3) [stating that adequacy of parking shall not support a finding of significance].) Further, courts have held that reduction in parking in urban downtown areas may be an inconvenience to drivers but is not an environmental impact, particularly where, as in the Transit District, any decrease in parking would have the environmentally desirable result of increasing reliance on mass transit. (See *Save Our Access-San Gabriel Mountains v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8, 26 [citing *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656]. See also Draft SEIR section 19.3, Project Objectives.)

Comment I-Schuch-2

The commenter references one of the project objectives (incentivize the ability for project applicants to pay a fee to the City in lieu of providing new parking spaces) and indicates that such objective would not mitigate the impact on residents surrounding Sequoia Station, and that any mitigation plan should include a commitment for the developer to build additional parking to the residents of the surrounding area in the event the number of cars at Sequoia Station exceeds available parking.

Response I-Schuch-2

Please see response to Comment I-Schuch-1 regarding why the project's effect on parking is not an environmental impact under CEQA and is not addressed in this SEIR.

Comment I-Schuch-3

The commenter suggests a number of requirements to be included for the Transit District/Sequoia Station, including 2 spaces per residential unit plus; adequate parking for Safeway and other retail customers plus; adequate parking for workers in the offices plus; and adequate parking for non-residents of Sequoia Station using the train station.

Response I-Schuch-3

Please see response to Comment I-Schuch-1 regarding why the project's effect on parking is not an environmental impact under CEQA and is not addressed in this SEIR.

Comment I-Schuch-4

The commenter indicates that steps must be taken to mitigate traffic on James Avenue associated with the Transit District/Sequoia Station. The commenter indicates that vehicular access to the Sequoia Station from James Avenue should be limited to cars using the Transit Station, and not the offices, retail and residences. The commenter adds that because of the many schools on or near James Avenue, traffic is already heavy during peak hours, and the added volume of cars resulting from the new residences and offices at Sequoia Station will lead to gridlock.

Response I-Schuch-4

As discussed in Section 9, *Transportation and Circulation*, in the Draft SEIR, the current applicable metric for evaluating CEQA transportation impacts is based on vehicle miles travelled (VMT) pursuant to CEQA Guidelines 15064.3(b), and consistent with the Redwood City Transportation Analysis Manual, as opposed to vehicle level of service (LOS). As demonstrated in the Draft SEIR Impact TR-2, the proposed Transit District DTPP Amendments would not exceed the VMT thresholds established by the City. Furthermore, the Draft SEIR determined that the effects of roadway network changes proposed by the Transit District DTPP Amendments was found to not have a substantial effect on VMT. As a result, the Draft SEIR concluded the VMT impact would be less than significant.

Nonetheless, a Local Transportation Analysis (LTA) was prepared for the proposed project in accordance with the Redwood City Transportation Analysis Manual, which analyzed non-CEQA transportation issues for General Plan and Congestion Management Program consistency. The LTA will be evaluated separately from this Draft SEIR by the decision makers when considering the project. The LTA determined that while the intersection of James Avenue and El Camino Real would continue to operate at acceptable level of service standards.

June 20, 2022

Redwood City Planning Commission
Redwood City Planning Commission
c/o Redwood City Planning Division
1017 Middlefield Road
Redwood City, CA 94063

RE: Transit District and Development Outcomes

Dear Chairperson Radcliffe and Members of the Commission:

Amidst the city's extensive review and discussions of what changes to make for the DTPP and the Transit District, there will be a great deal of attention paid to the environmental review work and the basic prescriptive standards and policies before you that make up the Transit District plan.

The central question, however, is whether this area plan will create the exemplary, corridor-defining, and transit-oriented development the city deserves, or just another series of non-descript block-filling uses and buildings like the Greystar projects along ECR.

To that end, I encourage you to look at examples of more human-scale and interesting architecture being developed along ECR in Menlo Park at 3-5 stories at the immediate street fronts, with taller buildings behind. Eight story walls at street frontage of minimally interesting building design and monolithic massing such as we have been provided along ECR to date are in a phrase, "nothing to write home about." Surely many think they are adequate, but none are what any decent architectural or urban design thinker or critic would call extraordinary. They merely occupy their respective building envelopes, have a minimal stepback at the fourth or fifth story, and fulfilled the developers' objectives, while being largely anonymous and forgettable in terms of design.

I encourage you and all decision-makers and advisers to consider several matters:

- The uniqueness, size and opportunities a parcel(s) such as the Sequoia Station center represents;
- The use of a four or five story massing limit within the first 50-60 feet of the ROW along Jefferson and ECR;
- The allowance of much increased height, up to 15 or 20 stories in the rear/center of the site, by which a potentially more interesting architectural statement might be possible than another blocky building;
- The use of 6-10 story height limits on other parts of the site;
- A much more prescriptive set of requirements for visually interesting, attractive building massing and design features than what is before you, which offers little more than hope that a development will meet the highest standards the city ought to expect for a truly unique site;

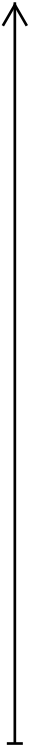
- An actual plaza or useable open space that could be attractive to all residents and users, rather than corridor-based streetscapes that are unlikely to succeed in creating much of a sense of place or destination-worthy attraction;
- Allowing or encouraging the partial use of air space above some of the final grid-based street and access corridors proposed in the plan; and finally,
- The use of charettes and design competitions to inform the city of the world of imaginative possibilities for building design, uses and massing that could be achieved beyond the potentially serviceable but uninspiring outcomes represented by the current development proposal, however well intentioned.

In the end, what the city prescribes, expects, demands and achieves for this unique site and the transit district as a concept should be, in the words of John Ruskin, more than for present use alone. Or merely meet some acceptable standards while fulfilling the private developer's needs and objectives.

"When we build, let it be such as our descendants will thank us for..." [paraphrased].

In other words, will the transit district's pre-eminent property become something people point to with pride of civic purpose, architectural magnificence, and inspiring beauty, or just another run-of-the mill set of blocky buildings that met minimal expectations at the time, but at which our descendants will merely shrug, or worse, ignore, as they go about their business.

Sincerely,
Bill Shoe



1 cont.

Responses to Comments from Bill Shoe – June 20, 2022 Letter

Comment I-Shoe-1

The commenter requests several points for consideration related to the Transit District, including: the uniqueness, size and opportunities parcels such as Sequoia Station represents; the use of four- or five-story massing within the first 50 to 60 feet of the right of way along Jefferson and El Camino Real; the allowance of increased height (up to 20 stories) in the rear/center of the site and use of 6 to 10-ten story height limits on other parts of the site; a more prescriptive set of requirements for more visually interesting and attractive building massing and design features; a plaza or useable open space rather than corridor-based streetscapes; allowing or encouraging the partial use of air space above some of the final grid-based street and access corridors; and the use of charrettes and design competitions to increase possibilities for building design, use and massing.

Response I-Shoe-1

These comments do not address the adequacy of the environmental analysis in the Draft SEIR. However, please note the City conducted community outreach on the Transit District over the last two years in public meetings, with online surveys, at community events, and through the Virtual Open House. While there was general support for allowing taller buildings to provide more housing or open space, there was not support for additional heights for office. The Transit District Amendments therefore maintain DTPP maximum heights. The comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment Letter I-Babbitt

From: Glenn Babbitt <glenn.babbitt@gmail.com>
Sent: Monday, June 20, 2022 2:35 PM
To: GRP-Planning Commissioners
Subject: Public comment, Planning Commission Meeting June 21, 2022, Item 5.A

Dear Members of the Planning Commission,

I'm writing in regard to the Draft SEIR for the Transit District Downtown Precise Plan. Specifically I endorse the following items, with the understanding that rigorous application and review for accountability must be enacted throughout the term of the project.

Environmental Review, Cultural and Historic Resources: the stop-work and consultation elements are adequate for CR-1, CR-2, and CR-4.

Environmental Review, Geology and Soils Impact: the stop-work element is adequate for GEO-6.

My feeling is that any historic discoveries during this project would be surprising, but they would be valuable and delightful surprises indeed!

Regards,
Glenn Babbitt

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Responses to Comments from Glenn Babbitt – June 20, 2022 Letter

Comment I-Babbitt-1

The commenter supports the Draft SEIR's use of Mitigation Measure CR-1 (for historic resources); and archaeological resource Mitigation Measure CR-2 (repeated in Mitigation Measure CR-4 for mitigation of tribal cultural resources), with the understanding that rigorous application and accountability be enacted throughout the term of the project. The commenter also indicates that the stop-work element in the Draft SEIR Mitigation Measure GEO-1 is adequate.

Response I-Babbitt-1

The comment is noted. As required under CEQA Guidelines, Section 15097, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared (see Chapter 4 in this Response to Comments document) and will be presented to the City at the time of certification of the Final EIR for the proposed Transit District DTPP Amendments, and will identify the specific timing and roles and responsibilities for implementation of adopted mitigation measures. The MMRP will ensure project compliance with mitigation measures during project implementation.

The comment concerning Mitigation Measure GEO-1 is noted and no response is required.

3.2.4 Draft SEIR Public Hearing Summary

**CITY OF REDWOOD CITY
PLANNING COMMISSION
ADJOURNED MEETING
FROM JUNE 7, 2022
MINUTES**



Meeting Location:
City of Redwood City
Council Chambers
1017 Middlefield Road
Redwood City, CA 94063

**June 21, 2022
5:00 PM**

To view the recording
www.redwoodcity.org/pc

APPROVED

COMMISSIONERS PRESENT: Commissioner Chu, Commissioner Crnogorac (joining by teleconference), Commissioner Meunier, Commissioner Martinez, Vice Chair Hunter (arrived at meeting at 5:52pm), and Chair Radcliffe

COMMISSIONERS ABSENT: Commissioner Bondonno

STAFF PRESENT: Assistant Community Development & Transportation Director Exline, Senior Planner Rojas, Principal Planner O'Dell, Transportation Manager Manzi, Assistant City Attorney Beyers, and Administrative Secretary and meeting host Mateo

GUESTS: Karl Heisler with ESA, Alexandra Barnhill Special Counsel to the City, Franziska Church with Fehr & Peers

PROCEEDINGS RECORDED: For further information not contained in this draft of the written minutes, a video recording of the entire zoom teleconference is available at www.redwoodcity.org/pc

AGENDA POSTED: Copies of the Agenda for this meeting are posted at City Hall 72 hours prior to the Planning Commission meeting.

1. **ROLL CALL** – (meeting called to order at 5:07pm)
2. **APPROVAL OF MINUTES:**
 - A. **Draft – March 15, 2022 – Regular Meeting**
M/S (Meunier/Martinez) to approve the Draft Minutes of March 15, 2022 as submitted
Roll Call - Motion Passed 5-0
 - B. **Draft – April 5, 2022 – Special Joint Study Session PC & AAC**
M/S (Meunier/Chu) to approve the Draft Minutes of April 5, 2022 as submitted
Roll Call - Motion Passed 5-0
3. **PUBLIC COMMENT ON THE CONSENT CALENDAR AND ON ITEMS NOT ON THE AGENDA: No Speakers**

4. CONSENT CALENDAR: No Items

5. PUBLIC HEARING

A. Public Hearing to receive comments on the Draft Subsequent Environmental Impact Report (Draft SEIR) for the Transit District Downtown Precise Plan and General Plan Amendments

Assistant Community Development & Transportation Director Exline gave a presentation with an overview of the proposed Transit District Amendments and a Transit District timeline.

Karl Heisler, ESA, gave a presentation explaining what a subsequent EIR is, went over the CEQA process, impacts, project alternatives, mitigation monitoring and reporting program, and CEQA summary.

PUBLIC HEARING

Open Public Hearing

Gwen Litvak provided some statistics regarding employment density and public transit ridership.

PH-Litvak-1

Greg Greenway asked for the EIR to be certified without delay, as it is essential for the future of Redwood City's downtown. He asked that they include life science as a land use in the transit district to be studied on a project by project basis, and to allow natural gas within the transit district.

PH-Greenway-2

Evelyn Stivers asked for the EIR to be certified, as it is a positive move for the city.

PH-Stivers-3

Nadine Fogarty briefly went over some collaborations between Caltrain and the City, gave some statistics, and voiced support of the draft EIR.

PH-Fogarty-4

Vince Rocha voiced support of the transit plan.

PH-Rocha-5

Adrian Brandt stated that the transit plan is critical to building the success of cities and developments up and down the corridor.

PH-Brandt-6

Rick Solis voiced support of the amended transit plan.

PH-Solis-7

Close Public Hearing

COMMISSIONER COMMENTS

Commissioner Chu echoed the comments of the public and agrees the EIR should be approved as quickly as possible.

PH-Chu-8

Commissioner Crnogorac asked if the REACH codes will apply to the natural gas requirement.

PH-Crnogorac-9

Mr. Heisler stated that the REACH codes will apply and there can be some exceptions.

Commissioner Crnogorac asked if there is more information regarding mixed land use alternative with less office space and increased housing.

PH-Crnogorac-10

Mr. Heisler stated that both alternatives were evaluated at a lesser level of detail at the qualitative level, and the determination was that impacts of that alternative would be somewhat reduced but not as much as reducing development altogether.

Ms. Exline stated that the City will apply the REACH codes to the project, and it is tentatively scheduled to review REACH codes this fall.

Alexandra Barnhill, Special Counsel to the City, stated that any natural gas and the feasibility of that is ultimately a political decision that the City can make and the Planning Commission can weigh in on. She further stated that there is an opportunity to evaluate more than just environmental impacts when you have a significant and unavoidable impact determination. She stated that you can also look into the legal, technological, social, economic, those types of aspects as well. She advised that there will be an opportunity in the future when this matter comes back before the body to evaluate whether or not it is feasible for certain types of uses, such as commercial kitchens or affordable housing, to totally eliminate natural gases.

Commissioner Chu asked if it is economically feasible to eliminate natural gas and what the tradeoffs are.

PH-Chu-11

Vice Chair Hunter stated that although he supported the mixed-use, transit-oriented design of the project, as well as its scale, he did not feel the draft EIR addressed the jobs/housing imbalance properly. He believed the DEIR had a flawed definition of planned vs. unplanned growth and did not adequately consider the cumulative effect of other projects that will be built. He was concerned with equity and the effects of the jobs/housing imbalance on our most vulnerable residents. He also believed the DEIR used an incorrect ratio of jobs to housing units in calculating the additional demand for residential units. He voiced support of the altered land use mix alternative.

PH-Hunter-12

Commissioner Chu stated that regarding jobs and housing imbalance, with SB 9 and other state housing laws there is an opportunity to expand the capacity of the City to add housing in a way that has balance.

PH-Chu-13

Commissioner Martinez stated that he would like to see the alternatives studied more and bridge downtown and more of a walkable destination.

PH-Martinez-14

Ms. Exline stated that they are doing studies on jobs and housing citywide.

6. STUDY SESSION

A. Study Session on Senate Bill 9 (SB 9) and the required ordinance amendments to allow up to two-unit developments and urban lot splits within single-family zoning districts (R-1/RH) consistent with the requirements of State Law

Senior Planner Rojas gave a presentation going over single-family zoned lots, explained what an SB 9 project and urban lot split are, went over the single-family

Responses to Comments from Public Hearing Summary – June 21, 2022 Letter

Comment PH-Litvak-1

The commenter indicates they represent the Bay Area Council. The commenter indicated a research brief published by the Bay Area Council Economic Institute found that employment density along transit increases transit ridership more than residential density. The commenter presented additional findings of the brief included the following: the higher the job density, the more positive influence on ridership; support of major employment nodes along transit corridors creates a strong bi-directional ridership which reduces strain on transit systems; concentrating jobs closer to transit stations can help employment opportunities for the carless, particularly low income workers; and mixed use development oriented around public transit reduces greenhouse gas emissions and lowers annual household rates of driving.

Response PH-Litvak-1

No response is required. However, these comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Greenway-2

The commenter spoke on behalf of the Chamber San Mateo County. The commenter requests certification of the SEIR without delay, and approval of the project. The commenter also requests that life science be included as a land use in the Transit District to be included on a project-by-project basis.

Response PH-Greenway-2

These comments are noted, and will be forwarded to the City decisionmakers for their consideration. Concerning life science use, City staff has determined not to modify the conditional uses to include R&D (laboratory). In the event a project requests a DTPP amendment to allow it in the future, CEQA review would be completed for such an amendment at that time.

In addition, the commenter request to allow natural gas within the Transit District, as allowed in the Reach Codes. Please see response to Comment O-CSMC2-5.

Comment PH-Stivers-3

The commenter spoke on behalf of the Housing Leadership Council of San Mateo County. The comment requested the SEIR be certified. The commenter spoke in favor of the Transit District's proposed improvements for local circulation, as well as providing affordable homes and jobs.

Response PH-Stivers-3

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Fogarty-4

The commenter spoke on behalf of Caltrain. The commenter indicates Caltrain has been collaborating with the City on a number of long-range planning efforts including the Transit District plan, including conceptual planning around potential future grade separation and hub station. The commenter states that by 2040 regional projections show a 40 percent increase in people living and working within two miles of a Caltrain station. The commenter adds that the Redwood City station was identified in Caltrain 2040 Service Vision as the ideal location for a 4-track mid-Peninsula transfer hub. The commenter expresses Caltrain's support for the SEIR, the Transit District plan and redevelopment of the Sequoia Station. The commenter indicates these efforts will help advance Caltrain's long-term service vision, which when realized will include increased frequencies of electrified rail service, and support increased capacity which will reduce vehicle miles and greenhouse gas emissions.

Response PH-Fogarty-4

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Rocha-5

The commenter spoke on behalf of the Silicon Valley Leadership Group, and expressed support for the Transit District Plan.

Response PH-Rocha-5

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Brandt-6

The commenter indicates Caltrain's 2040 expansion plans hinge on a central hub station at Redwood City, and that the hub station is a critical part of Caltrain's service vision, and to the success of cities and developments up and down the corridor due to growth contemplated within walking distance of Caltrain stations.

Response PH-Brandt-6

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Solis-7

The commenter spoke on behalf of the Carpenters Union Local 217 and expressed support for the proposed Transit District Amendments and the SEIR.

Response PH-Solis-7

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Chu-8

Commissioner Chu echoed the sentiments shared by the community members at the public hearing and agreed the SEIR should be approved as quickly as possible.

Response PH-Chu-8

These comments are noted, and will be forwarded to the City decisionmakers for their consideration.

Comment PH-Crnogorac-9

Commissioner Crnogorac inquired if the Reach codes will apply to the proposed Transit District as it relates to the natural gas requirements, or are there narrow exceptions that will allow some natural gas for affordable and commercial kitchens.

Response PH-Crnogorac-9

Please see response to Comment O-CSMC2-5.

Comment PH-Crnogorac-10

Commissioner Crnogorac indicates the alternative land use mix that included less office space but more housing did not appear to receive a full evaluation in the SEIR.

Response PH-Crnogorac-10

In response to the comment, the analysis of both the Reduced Development Alternative and the Altered Land Use Alternative has been revised to add quantitative comparisons of impacts, where applicable. Please see the revisions to Draft SEIR Chapter 19, *Alternatives*, in Chapter 2 of this Final EIR, *Revisions to the Draft SEIR*.

Comment PH-Chu-11

Commissioner Chu inquired if it economically feasible to eliminate natural gas, and what are the tradeoffs, such as from a health perspective, and environmental perspective.

Response PH-Chu-11

With respect to the economic feasibility of eliminating natural gas associated the proposed Transit District DTPP Amendments and tradeoffs, please see response to Comment O-CSMC2-5. Regardless, the project's use of natural gas associated with the Transit District DTPP Amendments and its incremental contribution to environmental and health effects are captured in the analyses in the Air Quality and Climate Change sections of the Draft SEIR, and mitigated to the extent feasible.

Comment PH-Hunter-12

The comment states that the Draft SEIR does not adequately address the fact that project would worsen the City's jobs-housing balance. The comment further states that the Draft SEIR improperly analyzes the project in comparison to planned growth by failing to consider other potential growth in Redwood City. Finally, the comment states that the Draft SEIR erroneously

calculates the indirect housing demand that would be generated by project employment growth and improperly assumes that the resulting housing shortfall would be made up elsewhere, which the comment claims is speculative.

Response PH-Hunter-12

As to jobs-housing balance (the ratio of jobs to employed residents in a given area), the Draft SEIR (page 5-3) explains that when there are substantially more employed residents than jobs in an area, more people must commute to another area, requiring longer commutes than if they worked locally (and vice versa). It is noted that even a 1:1 jobs-to-employed resident ratio does not necessarily mean that there will be no long-distance commuting, because there can be no guarantee that the employed residents in such a “balanced” community will all work at jobs in the same community. In general, however, a well-balanced ratio (close to one job per employed resident) is typically thought of as desirable at a regional level for environmental, economic, and quality-of-life reasons, although many other factors influence average commute distance.⁴ These might include a person’s roots—or lack thereof—in a particular community; a partner’s or spouse’s employment situation, location and perceived quality of schools, and other concerns.

As also explained in the Draft SEIR, Redwood City has a current ratio of more than one and a half jobs per employed resident, making it a more jobs-heavy community, much like many cities in the southern portion of the San Francisco Peninsula. However, San Mateo County as a whole has a jobs-to-employed residents ratio of essentially 1.0.

Jobs-housing balance is generally most effectively addressed at a regional or sub-regional level, rather than on the basis of a specific project’s ratio of jobs to employed residents or even at the level of a single community, because it is likely to be infeasible for every city to demonstrate self-contained jobs-housing equivalency, given the very large number of factors that influence where people live and work. In this case, while the Transit District represents a proposed plan for a sub-area of Downtown Redwood City and not an individual development project, it must be recognized that the Transit District site encompasses a relatively small geographic area (16.6 acres). Accordingly, while the proposed Transit District would have a greater ratio of jobs to employed residents than does Redwood City as a whole (approximately 4.4 for the Transit District, compared to 1.6 for the City as a whole), this reflects the fact that the Transit District is within the downtown area that has historically housed many of Redwood City’s jobs. In fact, as explained in Draft SEIR Chapter 5, *Population and Housing*, under existing conditions, there are no residential units within the Transit District, while there is about 178,000 square feet of existing retail space. In contrast, there are large areas of the City and region that are exclusively residential. The proposed Transit District DTPP Amendments would allow for the introduction of some 1,100 new housing units to the Transit District where today there are none.

Moreover, the Transit District would be centered around the existing (and potential future) Redwood City Transit Center, which includes the Caltrain station and SamTrans bus depot. There

⁴ According to U.S. Census data (American Community Survey, 5-Year Estimates for 2020), approximately two-thirds of employed Redwood City residents work in San Mateo County. This is a greater share than for all employed San Mateo County residents, of whom about 60 percent work in San Mateo County, and also higher than the Bay Area average: about 57 percent of Bay Area workers live and work in the same county.

is a growing body of transportation research indicating that locating jobs near transit is more effective in increasing transit ridership than locating housing near transit: as alluded to by a previous commenter at the public hearing, a recent report by the Bay Area Council Economic Institute found that employment density proximate to transit increases transit ridership more than residential density, in part because people are more willing to walk between transit and the workplace than between transit and home (Bay Area Council, 2022). Another finding of the report was that, because lower-income people are more likely to be dependent on transit, a heavy concentration of jobs near transit can “help broaden employment opportunities for the carless, particularly low-income workers, translating to more equitable outcomes for all.” As a result, the large concentration of jobs proposed within the Transit District, very near the Redwood City Transit Center, would likely result in increased transit use (and therefore less auto travel and fewer emissions of air pollutants and greenhouse gases), compared to a project with fewer jobs near transit, and this concentration of jobs near transit could also enhance equity.

Regarding the Draft SEIR’s description of proposed project growth in comparison to planned growth, CEQA requires that the effects of a project be analyzed in isolation (i.e., project-specific impacts) so that decision-makers can consider those impacts. Therefore, the Draft SEIR appropriately compares Transit District growth alone to planned growth in Redwood City in Chapter 5, Population and Housing. However, CEQA also requires analysis of cumulative effects, meaning the incremental impact of the project when added to the impacts of other closely related past, present, or reasonably foreseeable future projects, and the Draft SEIR does this in Chapter 17, Cumulative Impacts. In this chapter, the Draft SEIR answers the concern raised in the comment, that the proposed Transit District, in combination with other projects, could result in development that exceeds what is planned. However, as stated in Chapter 17, planned growth that is included in the regional projections promulgated by the Association of Bay Area Governments includes more than enough housing and jobs to accommodate not only the Transit District but also the planned DTPP Plan-Wide Amendments, which are the subject of a separate SEIR, as well as other known cumulative projects in Redwood City. Although the commenter alleges that “if every month for the next year, a project was proposed that added 7,000 jobs, this would all be considered planned growth, because each project by itself would be less than [the 15,000 planned jobs],” there is no reasonably foreseeable circumstance in which such a development pattern would arise. Instead, the Draft SEIR’s cumulative analysis properly considers reasonably foreseeable cumulative development and determines that the proposed Transit District, in combination with cumulative development, would not result in unplanned growth.

As to the analysis of indirect housing demand, the commenter is correct that the Draft SEIR projection of such demand is low. Based on an existing average of 1.5 employed residents per household (as suggested by the commenter—approximately the same ratio as exists throughout San Mateo County), the anticipated 7,080 jobs in the proposed Transit District would generate an approximate demand for 4,720 new housing units. Please see revisions made to Draft SEIR page 5-11 in Chapter 2, Revisions to the Draft SEIR, in this Response to Comments document.

However, that number of 4,720 units assumes that all jobs created in the Transit District would be held by persons not currently living in Redwood City or elsewhere in San Mateo County or nearby areas. In reality, at least some of the jobs created pursuant to the plan would result from

companies moving to the Transit District area from elsewhere in Redwood City or the region (and thus could likely be filled by existing employees relocating from elsewhere), while other “net new” jobs could be filled by persons already living in Redwood City or the region, either because they move from other employers or because they are not currently employed. As stated in the Draft SEIR, the Transit District is anticipated to result in 1,100 new residential units, or about 23 percent of the total housing demand generated by the project if this demand were all new; as stated just above, this would be highly unlikely. These 1,100 units could provide housing for some 1,650 employees, using the same ratio set forth above.

However, as stated previously, it is not necessarily appropriate to consider jobs-housing balance at a project or area level given the size and location of the proposed Transit District. At the Citywide level, the draft Redwood City Housing Element for the period 2023-2031 has identified the aspirational potential for the addition of up to 7,003 new housing units in Redwood City in this eight-year period, of which about 5,075 units would be above and beyond the 1,930 new units anticipated under the Transit District and the DTPP Plan-Wide Amendments.⁵ (The Transit District DTPP Amendments alone would allow for addition of nearly 16 percent of the 7,003 units.) While the Housing Element, like any housing element, is somewhat aspirational in that it sets forth potential housing but does not directly lead to the development of new units, the projected 7,003 units will represent the City’s stated goal, assuming adoption of the Housing Element in early 2023. Moreover, the Housing Element covers the period only through 2031, while the Transit District is not assumed to be fully built out until 2040.⁶

Together, DTPP amendments for the Transit District and at the DTPP Plan-Wide level would generate a total employment-based demand for up to about 8,100 housing units (based on total employment of 12,150), using the same calculations as set forth above. Accounting for the approximately 1,930 housing units assumed in the two sets of DTPP amendments, net housing demand would be 6,170 units. Again, that number assumes that all employment-based demand would be for new housing units which, as explained above, is very unlikely to be the case. However, even if that were true, the additional approximately 5,075 units identified in the Housing Element would accommodate more than 82 percent of the net employment-based housing demand resulting from the two sets of DTPP amendments.

As discussed above, a major impetus behind developing new employment opportunities in the Transit District and the wider DTPP is to allow for transit access to these jobs. And, based on Census data, only about 58 percent of workers throughout San Mateo County live in San Mateo County, meaning that 42 percent of county employees already live elsewhere. While Redwood City is the county’s employment center, it still accounts for only about 18 percent of jobs in San Mateo County, meaning that the share of Redwood City employees who actually live in Redwood

⁵ The draft Housing Element unit total of 7,003 units includes more than 1,400 approved but unbuilt units that were not anticipated to be constructed before July 1, 2022, and which therefore may be counted towards meeting City’s Regional Housing Needs Allocation (RHNA). The draft Housing Element’s stated housing unit goal is 1.5 times the City’s RHNA of 4,588 units, for a goal of 6,882 units. The draft Housing Element has identified more than 80 percent of this goal—almost 5,600 units—beyond those that are part of approved but unbuilt projects.

⁶ It is noted that one major project in the proposed Transit District area—Sequoia Station—could likely be built sooner than 2040; however, that project would also develop more than half of the housing units anticipated pursuant to the Transit District DTPP Amendments.

City is far lower than the countywide figure of 58 percent. Many factors underlie the choice of housing location, of which availability and affordability are major considerations. But lifestyle preferences also play a role. At any rate, the actual demand for housing in Redwood City generated by the 11,770 jobs anticipated throughout the DTPP from the combination of Transit District and Plan-Wide amendments would likely be far less than the total theoretical demand. Even assuming that the demand would be as high as the current countywide percentage of county residents working in the county (58 percent), the housing demand would be about 2,740 units, which would be 810 units more than are anticipated within the DTPP pursuant to the two sets of DTPP amendments. The shortfall would easily be made up by units projected to be developed pursuant to the Housing Element. Accordingly, the Draft SEIR's conclusion of no new significant impact with respect to induction of unplanned growth in housing demand, compared to that presented in the DTPP EIR, remains valid.

Comment PH-Chu-13

Commissioner Chu stated that regarding jobs and housing imbalance, with SB 9 and other state housing laws there is an opportunity to expand the capacity of the City to add housing in a way that has balance.

Response PH-Chu-13

The comment is noted; please also see response to Comment PH-Hunter-12, above.

Comment PH-Martinez-14

Commissioner Martinez stated that he would like to see the alternatives studied more and stated that the proposed Transit District DTPP Amendments would provide for a “bridge” between El Camino Real and existing development in Downtown Redwood City and help make Downtown more of a walkable destination.

Response PH-Martinez-14

Please see the responses to Comment A-JPB-1 and Comment PH-Crnogorac-10 regarding alternatives.

3.3 References

Bay Area Council Economic Institute, 2022, *Optimizing Land Uses at Transit Stations*. Available at: <http://www.bayareaeconomy.org/report/optimizing-land-uses-near-transit-stations/>. Accessed July 18, 2022.

Chapter 4

Mitigation Monitoring and Reporting Program

4.1 Introduction

Public Resources Code Section §21081.6(a)(1)) and the California Environmental Quality Act (CEQA) Guidelines Section 15097 require public or lead agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

A public or lead agency adopting measures to mitigate or avoid the significant impacts of a proposed project is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). The mitigation measures required by a public or lead agency to reduce or avoid significant project impacts not incorporated into the design or program for the project may be made conditions of project approval as set forth in a Mitigation Monitoring and Reporting Program (MMRP). The program must be designed to ensure project compliance with mitigation measures during project implementation.

The following is the MMRP for the proposed Transit District DTPP Amendments. The MMRP includes the mitigation measures identified in the SEIR which are required to address the significant impacts associated with the proposed DTPP Amendments. The required mitigation measures are summarized in this program; the full text of the impact analysis and mitigation measures are presented in the Final SEIR.

4.2 Format of the MMRP

The MMRP is organized in a table format (see Table 4-1), keyed to each mitigation measure. Only mitigation measures adopted to address significant impacts are included in this program. Each mitigation measure is set out in full, followed by a tabular summary of monitoring requirements. The column headings in the tables are defined as follows:

- **Mitigation Measures:** This column identifies the mitigation measures associated with the impacts identified in the EIR.
- **Monitoring and Reporting Actions:** This column contains an outline of the appropriate steps to verify compliance with the mitigation measure.
- **Monitoring Responsibility:** This column contains an assignment of responsibility for the monitoring and reporting tasks.
- **Monitoring Schedule:** The general schedule for conducting each monitoring and reporting task, identifying where appropriate both the timing and the frequency of the action.

4.3 Enforcement

If the proposed Transit District DTPP Amendments are approved and the Final EIR certified, the MMRP would be adopted by the City. Therefore, all mitigation measures for significant impacts must be carried out in order to fulfill the requirements of approval. All mitigation measures would be applied to each subsequent development project in the Transit District (checked on plans, in reports, and in the field prior to construction).

TABLE 4-1
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Cultural Resources				
Mitigation Measure CR-1 (formerly Mitigation Measure 7-4 from the DTPP Final EIR with clarifying amendments): The Project Applicant for each subsequent development project that requires a discretionary approval and that is adjacent to a historic resource shall engage a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards (36 CFR part 61) and by the City's Historic Resources Advisory Committee to review the proposed development for its potential impacts on the adjacent historic resource. Any site and architectural design modifications identified through this review process as necessary to avoid a "substantial adverse change" in the significance of the adjacent historic resource and protect its continued eligibility for listing on the California Register, as determined by the City, shall be required of the Project Applicant as conditions of project approval.	Project Applicant, qualified architect or architectural historian, City Historic Resources Advisory Committee	<ol style="list-style-type: none"> Review proposed development for potential impacts if adjacent to a historic resource Incorporate design modifications to void a "substantial adverse change" and include a conditions of project approval 	City	Prior to issuance of building permit
Mitigation Measure NO-3 (formerly Mitigation Measure 11-3 from the DTPP Final EIR with clarifying amendments)	See Mitigation Measure NO-3 below	See Mitigation Measure NO-3 below	See Mitigation Measure NO-3 below	See Mitigation Measure NO-3 below
<p>Mitigation Measure CR-2 (formerly Mitigation Measure 7-1 from the DTPP Final EIR, with clarifying amendments): Implementation of the following mitigation measures would reduce the potential impacts of new development facilitated by the proposed Transit District DTPP Amendments on undiscovered archeological resources to a less-than-significant level:</p> <p>a) In the event that any deposit of prehistoric or historic archaeological materials is encountered during project construction activities, the construction contractor shall ensure that all work within an appropriate buffer area around the discovery, but not less than 50 feet, shall be stopped and a qualified archaeologist meeting federal criteria under 36 CFR 61 shall be contacted to assess the find(s) and make recommendations. The project applicant(s) shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered.</p> <p>In the event prehistoric or historic archaeological materials cannot be avoided by project activities, the City Community Development and Transportation Department shall confirm that the project applicant has retained a qualified archaeologist to evaluate the potential historic significance of the find(s). All archaeological material unearthed by project construction activities shall be evaluated by the qualified archaeologist. If the find(s) are determined to not be a historical resource pursuant to CEQA Guidelines Section 15064.5(a) or a unique archaeological resource pursuant to Public Resources Code Section 21083.2(g) by the qualified archaeologist, and was not identified as a tribal</p>	City Community Development and Transportation Department, City Building Department, qualified archaeologist, construction contractor	<ol style="list-style-type: none"> In the event any deposit of prehistoric or historic archaeological materials are encountered. Implement consultation and data recovery plan in the measure. 	<ol style="list-style-type: none"> City Community Development and Transportation Department 	<ol style="list-style-type: none"> During soil-disturbing activities

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Cultural Resources (cont'd.)				
Mitigation Measure CR-2 (cont'd.)				
<p>cultural resource by a Native American representative, avoidance is not necessary. If the find(s) are determined by the qualified archaeologist to be a historical resource or a unique archaeological resource, the resource 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 Community Development and Transportation Department, the project applicant, and in accordance with CEQA Guidelines Section 15126.4 (b)(3)(C), which requires the preparation and implementation of a data recovery plan.</p> <p>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, as 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.</p> <p>The City Community Development and Transportation Department shall confirm that the project applicant has 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 Community Development and Transportation Department. Once the recovery plan is reviewed and approved by the City Community Development and Transportation 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 qualified archaeologist, in coordination with the City, as adequately recorded and recovered by studies already completed as per CEQA Guidelines Section 15126.4 (b)(3)(D). The qualified archaeologist shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.</p>				

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Cultural Resources (cont'd.)				
Mitigation Measure CR-2 (cont'd.)				
b) Prior to the issuance of grading permits within the Transit District area, the City Community Development and Transportation Department shall confirm that any development applicant has required all construction crews to undergo training for the identified 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 Transit District 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.		2. Confirm that the development applicant has required construction crews to undergo training	2. City Community Development and Transportation Department	2. Prior to issuance of grading permit
Utilities and Infrastructure; Hydrology and Water Quality				
Mitigation Measure UT-1: Emergency Water Storage: All subsequent development projects in the Transit District area, regardless of size, shall pay a fair-share contribution towards the cost of providing emergency water storage for all proposed uses to fund the design and construction of such storage.	Project Applicant, City	Pay fair-share contribution	City	Prior to issuance of building permit
Mitigation Measure UT-2: Recycled Water Infrastructure: The developer of all subsequent development projects in the Transit District area, regardless of size, shall be required to install an extension of recycled water supply pipelines to each development project with sufficient recycled water capacity to provide for all of the project's recycled water demands while achieving the required pressure, flow, and other system design criteria of recycled water system pursuant to City of Redwood City standards. Where a project developed earlier pays the entire cost of recycled water pipeline extension to the Transit District area, the original developer may be reimbursed by subsequent development projects located within the Transit District area which must pay a fair-share contribution (based upon its proportion of wastewater generated from within the Transit District area) towards the extension of recycled water supply pipelines to connect the project to the City's recycled water system prior to ground disturbance.	Project Applicant, City	1. Install extension of recycled water supply pipelines to each development project or; 2. Subsequent developer to pay fair-share contribution to original developer	City	During construction (installation of extension) Prior to issuance of building permit (if fair-share contribution)

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Noise				
<p>Mitigation Measure NO-1: Construction Noise Reduction (formerly Mitigation Measure 11-4 from the DTPP Final EIR with clarifying amendments): The City shall require Project Applicants to reduce demolition and construction noise impacts on adjacent uses by imposing conditions of approval on all future projects involving demolition and construction activities. These conditions shall require the Project Applicant to undertake the following conventional construction-period noise abatement measures:</p> <ul style="list-style-type: none"> • 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 AM to 8:00 PM Monday through Friday except when authorized by the Building Official (Redwood City Municipal Code Section 24.32). • 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 shall 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.) 	Project Applicant, City	1. Prepare and implement construction plan and noise abatement measures	City	1. Prepare construction plan prior to issuance of building permit 2. Implement construction plan and noise abatement measures during construction

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Noise (cont'd.)				
Mitigation Measure NO-1 (cont'd.)				
<ul style="list-style-type: none"> Noise Disturbance Coordinator. For projects that would last over one year in duration, the City may choose to require the Project Applicant to designate a "Noise Disturbance Coordinator" who shall be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. The Project Applicant shall 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 Noise Disturbance Coordinator shall work directly with an assigned City staff member.) 				
<p>Mitigation Measure NO-2: Operational Noise Performance Standard: Prior to the issuance of any building permit, future Project Applicants within the Transit District area shall ensure that all mechanical equipment is selected and designed to reduce impacts on surrounding uses by meeting the performance standards of Chapters 36.7.B of the Redwood City Zoning Code, limiting noise from stationary sources such as mechanical equipment to 55 dBA at the property lines. If noise levels exceed these standards, the activity causing the noise shall be abated until appropriate noise reduction measures have been installed and compliance has been verified by the City. Methods of achieving these standards include, but are not limited to, using low-noise-emitting HVAC equipment, locating HVAC and other mechanical equipment within a rooftop mechanical penthouse, and using shields and parapets to reduce noise levels to adjacent land uses. For emergency generators, industrial-grade silencers can reduce exhaust noise by 12 to 18 dBA, and residential-grade silencers can reduce such noise by 18 to 25 dBA (American Society of Heating, Refrigeration, and Air Conditioning Engineers, Technical Committee on Sound and Vibration, 2006). Acoustical screening can also be applied to exterior noise sources and can achieve up to 15 dBA of noise reduction (Environmental Noise Control, 2014).</p> <p>An acoustical study shall be prepared by a qualified acoustical engineer during final building design to evaluate the potential noise generated by building mechanical equipment and to identify the necessary design measures to be incorporated to meet the City's standards. The study shall be submitted to the Director of the City of Redwood City Community Development and Transportation Department for review and approval before the issuance of any building permit.</p>	Project Applicant, qualified acoustical engineer, City	Prepare acoustical study during final building design	Director of the City of Redwood City Community Development and Transportation Department	Prior to issuance of building permit

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Noise (cont'd.)				
<p>Mitigation Measure NO-3: Vibration Reduction (formerly Mitigation Measure 11-3 from the DTPP Final EIR with clarifying edits): The City shall 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 Project Applicant to ensure the following ground-borne vibration abatement measures are implemented by the construction contractor:</p> <ul style="list-style-type: none"> • Restrict vibration-generating activity to between the hours of 7:00 AM and 5:00 PM, Monday through Friday except when authorized by the Building Official (Redwood City Municipal Code Section 24.32). • 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 inches/sec) ppv for structurally sound buildings and 2 mm/sec (0.08 inches/sec) ppv for historic buildings. 	Project Applicant, construction contractor(s), City	<ol style="list-style-type: none"> 1. Include vibration reduction as condition of approval for future projects 2. Implement vibration reduction measures 	1. City	<ol style="list-style-type: none"> 1. Prior to issuance of building permit 2. During construction
Air Quality				
<p>Mitigation Measure AQ-2a: Best Management Practices for Construction Dust Suppression.</p> <p>All subsequent projects, regardless of size, shall implement best management practices to reduce construction impacts, particularly fugitive dust, to a less-than-significant level.</p> <p>Specifically, the project applicant for any subsequent development project in the Transit District area shall require all construction plans to specify implementation of the following best management practices:</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • 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. 	Project Applicant, construction contractor(s)	<ol style="list-style-type: none"> 1. Measure is incorporated into construction specifications 2. Construction contractor carries out construction pursuant to contract specifications 	City	<ol style="list-style-type: none"> 1. Prior to construction 2. During construction

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2a (cont'd.)				
<ul style="list-style-type: none"> All vehicle speeds on unpaved roads shall be limited to 15 mph. 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. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 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. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 		3.		3.
<p>Mitigation Measure AQ-2b: Emission Reduction Measures for Projects Exceeding the Significance Thresholds for Criteria Pollutants.</p> <p>Project applicants proposing projects that exceed BAAQMD screening levels shall prepare a project-level criteria air pollutant assessment of construction and operational emissions at the time the project is proposed. The project-level assessment shall either include a comparison of the project with other similar projects where a quantitative analysis has been conducted, or shall provide a project-specific criteria air pollutant analysis to determine whether the project exceeds the BAAQMD's criteria air pollutant thresholds.</p> <p>In the event that a project-specific analysis finds that the project could result in criteria air pollutant emissions that exceed BAAQMD significance thresholds, the project applicant shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than the significance thresholds, and shall implement additional feasible measures if necessary to reduce the impact to less than the significance thresholds.</p> <p>Clean Construction Equipment</p> <ol style="list-style-type: none"> The project applicant shall use electric construction equipment when feasible. 	Project Applicant, construction contractor(s)	<ol style="list-style-type: none"> Prepare project-level criteria air pollutant assessment of construction and operational emissions Implement emission reduction measures 	<ol style="list-style-type: none"> City City 	<ol style="list-style-type: none"> When the project is proposed During construction

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2b (cont'd.)				
<p>2. The project applicant shall ensure that all diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, except as provided for in this section. This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the BAAQMD as necessary. The Certification Statement shall state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract.</p> <p>The City may waive the requirement for Tier 4 Final equipment only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction for the project and (ii) geographic proximity to the project site of Tier 4 Final equipment.</p> <p>3. The project applicant shall require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.</p> <p>Operational Emission Reductions</p> <p>1. As required by Mitigation Measure CC-1, projects shall comply with the "all electric" requirement in the City's Reach Codes in effect at the time that a building permit application is filed.</p>	Project Applicant	3. Implement operational emission reductions	3. City	3. Prior to issuance of building permit

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2b (cont'd.)				
<p>2. As required by Mitigation Measure CC-1, projects shall provide EV charging infrastructure consistent with the City's Reach Codes or the applicable Tier 2 CALGreen standards in effect at the time, whichever is more restrictive.</p> <p>3. All newly constructed loading docks on commercial properties that can accommodate trucks with Transport Refrigeration Units (TRUs) shall be equipped with EV charging equipment to power TRUs during loading and unloading at docks. This measure does not apply to temporary street parking for loading or unloading.</p> <p>Emission Offsets</p> <p>If a project-specific analysis finds that the project could result in criteria air pollutant emissions that exceed BAAQMD significance thresholds despite implementation of the above emission reduction measures, the project applicant shall pay mitigation offset fees to the BAAQMD's Bay Area Clean Air Foundation or other governmental entity. The mitigation offset fee shall fund one or more emissions reduction projects within the San Francisco Bay Area Air Basin. The fee will be determined by the City, the project applicant, and the BAAQMD or other governmental entity, and be based on the type of projects available at the time of the payment. The fee is intended to fund emissions reduction projects to achieve annual reductions of ROG, NOX, and PM10 equal to the amount required to reduce emissions below significance levels after implementation of other emission reduction strategies identified above.</p>	Project Applicant	4. Pay mitigation offset fees if project results in criteria pollutant emissions exceeding BAAQMD thresholds with implementation of emission reduction measures	4. City, BAAQMD	4. Prior to issuance of building permit
<p>Mitigation Measure AQ-3: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction.</p> <p>Project applicants within the Transit District area proposing projects within 1,000 feet of existing or approved sensitive receptors shall prepare a project-level HRA of construction impacts at the time the project is proposed. The HRA shall be based on project-specific construction schedule, equipment and activity data and shall be conducted using methods and models approved by the BAAQMD, CARB, OEHHA and U.S. EPA. Estimated project-level health risks shall be compared to the BAAQMD's health risk significance thresholds for projects.</p> <p>In the event that a project-specific HRA finds that the project could result in significant construction health risks that exceed BAAQMD significance thresholds, the project applicant shall implement Mitigation Measure AQ-2b's requirement for the use of all Tier 4 Final construction equipment to reduce project-level health risks to a less than significant level. In addition, all tower cranes and man- and material-lifts shall be electric powered and forklifts shall be electric or LNG powered.</p>	Project Applicant, City	Prepare project-level HRA	City	At the time the project is proposed

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Climate Change				
Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2. Subsequent development projects proposed as part of the Transit District DTPP Amendments shall comply with the "all electric" requirement in the City's Reach Codes in effect at the time that a building permit application is filed, and shall comply with EV requirements in the City's Reach Codes or the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed, whichever is more restrictive. Subsequent development projects may qualify for exceptions to Reach Code all-electric requirements.	Project Applicant	Comply with all-electric requirements in applicable Reach Codes and comply with EV requirements in applicable Reach Codes or most recently adopted version of CALGreen Tier 2, whichever is more restrictive.	City	Prior to issuance of building permit
Biological Resources				
Mitigation Measure BIO-1 (formerly Mitigation Measure 15-3 from the DTPP Final EIR): Project Applicant shall ensure that all tree removal and trimming, as well as ground disturbing activities, are 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 suitable buffer shall be established around the nest based on CDFW standards, and the buffer shall remain in place until the City has determined, in consultation with the qualified biologist, that the buffer is no longer necessary to avoid significant impacts to the nest.	Project Applicant, qualified biologist, and CDFG (if applicable)	Conduct nesting bird survey if construction is during breeding season.	City	During construction
Mitigation Measure BIO-5 (formerly Mitigation Measure 15-4 from the DTPP Final EIR): Any project in the Transit District area 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.	Project Applicant, qualified biologist, and CDFG (if applicable)	Complete application and review process	City	Prior to issuance of building permit
Geology and Soils				
Mitigation Measure GEO-2 (formerly Mitigation Measure 16-3 from the DTPP Final EIR with clarifying amendments): The City shall require applicants for future development projects in the Transit District area involving a grading area of 10,000 or more square feet to prepare erosion control plans subject to City approval and consistent with the required project Stormwater Pollution Prevention Plans (SWPPPs) as well as Best Management Practices (BMPs) specified by the Redwood City Stormwater Management and Discharge Control Program (Municipal Code Chapter 27A). The plans and BMPs shall be implemented during construction.	City, Project Applicant	1. Prepare erosion control plans 2. Implement BMPs during construction	City	1. Prior to construction 2. During construction

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Geology and Soils (cont'd.)				
Mitigation Measure GEO-2 (cont'd.)				
Erosion during all phases of construction shall be controlled through the use of erosion and soil transport control facilities. These shall include the use of catch basins and filter fabrics, and the direction of stormwater runoff away from disturbed areas. The plans shall also provide for long-term stabilization and maintenance of remaining exposed soils after construction is completed. Areas disturbed by construction shall be either covered with impervious surfaces (e.g., buildings and pavement) or fully stabilized with landscaping and/or native vegetation. All revegetated areas shall be irrigated and maintained as necessary to ensure the long-term survival of the vegetation.				
Mitigation Measure GEO-4a (formerly Mitigation Measure 16-1 from the DTPP Final EIR with clarifying amendments): 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 by a geotechnical engineer and the location 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, since 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.	Project Applicant, project geotechnical engineer, City Building Official	<ol style="list-style-type: none"> 1. Prepare detailed design-level geotechnical investigation and incorporate measure into construction specifications 2. Conduct supplemental field and laboratory testing, and inspection 3. Prepare site-specific recommendations if expansive soils not fully remediated on each lot and incorporate into a report to be included with each building permit application 	<ol style="list-style-type: none"> 1. City 2. City 3. City 	<ol style="list-style-type: none"> 1. Prior to issuance of grading permit 2. During construction 3. Prior to issuance of building permits for future projects

TABLE 4-1 (CONTINUED)
TRANSIT DISTRICT DTPP AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Monitoring Schedule
Geology and Soils (cont'd.)				
<p>Mitigation Measure GEO-4b (formerly Mitigation Measure 16-2 from the DTPP Final EIR with clarifying amendments): Project plans and specifications shall ensure that water systems and other buried metal infrastructure in all future development within the Transit District area shall, in addition to other coatings called for in the specifications, have cathodic protection using a sacrificial anode system. Design criteria for cathodic protection shall conform to Part VII (G) of the City's water system design criteria and standard specification details Section 02661.</p> <p>Concrete mix designs shall conform to California Department of Transportation (Caltrans) Memo to Designers 10-5 January 2002 Protection Reinforcement Against Corrosion Due to Chlorides, Acids, and Sulfates.</p>	Project Applicant, City	Measure is incorporated into construction plans and specifications	City	Prior to issuance of building permit
<p>Mitigation Measure GEO-6 (formerly Mitigation Measure 7-5 from the DTPP Final EIR with clarifying amendments): Prior to the issuance of grading or demolition permits, the Community Development & Transportation Department, in coordination with a qualified paleontologist, shall assess individual development project proposals within the Transit District area for the potential to destroy unique paleontological resources. The City's Community Development and Transportation 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's Community Development & Transportation Department. These provisions may include the complete avoidance of the resource, in -place preservation, and/or complete data recovery as discussed in Mitigation Measure CR-2. Implementation of this measure would reduce the potential impact on paleontological resources to a less-than-significant level.</p>	Project Applicant, qualified paleontologist, Community Development & Transportation Department	<ol style="list-style-type: none"> 1. Projects entailing significant earthwork or deep foundations to prepare a study to assess the potential for damage to paleontological resources 2. Implement provisions to protect resources during construction 	Community Development and Transportation Department	<ol style="list-style-type: none"> 1. Prior to issuance of grading or demolition permit 2. During construction