

Final

REDWOOD CITY DTPP PLAN-WIDE AMENDMENTS

Subsequent Environmental Impact Report

State Clearinghouse No. 2021090249

Prepared for
City of Redwood City

May 2023



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CHAPTER 1

Introduction and List of Commenters

1.1 Introduction

1.1.1 Purpose of this Document

The proposed Downtown Precise Plan (DTPP) Plan-Wide Amendments would revise certain DTPP development standards, guidelines and policies, including those regarding permitted or conditionally permitted land uses; streets and circulation; building placement; minimum building height and massing; parking; historical resources; and open space, making policy changes in advance of consideration by the City of six so-called "Gatekeeper" development projects to ensure these projects conform to the City's vision for the development of the Downtown. With the changes, City Council approval would be required for any Large Project requesting a General Plan Amendment;¹ such projects would also be subject to Development Agreements. This SEIR also evaluates a potential future northward extension of the DTPP area boundary between El Camino Real and the Caltrain tracks; adding 80,000 square feet to the maximum office development cap (reserved for small office projects of 20,000 new square feet or less); and the potential for up to 1,167,100 square feet of new office development and 830 new residential units in the DTPP area.

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 DTPP Plan-Wide 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 DTPP Plan-Wide 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 DTPP Plan-Wide Amendments.

As described in greater detail under Section 1.1.2, Environmental Review Process, below, the City published a Draft SEIR on the proposed DTPP Plan-Wide Amendments on November 14, 2022, and the public review period for the document ended on December 29, 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 DTPP Plan-Wide

¹ Large Projects include: new construction or addition of more than 10 percent of floor area to an existing building, on a site larger than 30,000 square feet; a new parking structure that is fully or partially exposed to the street; and most new construction and additions exceeding 35 feet or three stories in height.

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 DTPP Plan-Wide Amendments to ascertain that the SEIR reflects the Lead Agency's independent judgment and analysis of the physical impacts of the proposed DTPP Plan-Wide 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 September 14, 2021, a Notice of Preparation (NOP) was published for the DTPP Plan-Wide Amendments SEIR. A 31-day public comment period ended on October 14, 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 21, 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 November 14, 2022, the City released the Draft SEIR on the proposed DTPP Plan-Wide Amendments for public review. A 45-day public review and comment period on the Draft SEIR began on November 14, 2022 and closed on December 29, 2022. During the public review period, the City received one comment letter from an individual and no comment letters from governmental agencies or organizations. The City also held a public hearing before the City Planning Commission on December 6, 2022 to receive oral comments on the Draft SEIR.

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 DTPP Plan-Wide 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 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 DTPP Plan-Wide Amendments, or new feasible mitigation measures or alternatives

considerably different than those analyzed in the Draft SEIR that would clearly lessen the proposed DTPP Plan-Wide 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 (November 14, 2022 through December 29, 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 is 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

No public agencies commented in writing on the Draft SEIR.

1.2.1.2 List of Organizations Commenting in Writing on the Draft SEIR

No organizations commented in writing on the Draft SEIR.

1.2.1.3 List of Individuals Commenting in Writing on the Draft SEIR

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

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

Commenter Code	Name of Individual Submitting Comments	Comment Format	Comment Date
I-Bloomquist	Bloomquist, Cary	Email	12/01/2022

SOURCE: City of Redwood City, 2022

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

Table 1-2, below, provides a list of all individuals commenting orally at the public hearing on the Draft SEIR.

**TABLE 1-2
INDIVIDUALS COMMENTING ON THE DRAFT SEIR, PUBLIC HEARING**

Commenter Code	Name of Individual Submitting Comments	Comment Format	Comment Date
PH-Brandt	Brandt, Adrian	Meeting Minutes	12/06/2022
PH-Babbitt	Babbitt, Glenn	Meeting Minutes	12/06/2022
PH-Crnogorac	Crnogorac, Filip - Commissioner Vice Chair	Meeting Minutes	12/06/2022
PH-Chu	Chu, Isabella - Commissioner	Meeting Minutes	12/06/2022
PH-Koch	Koch, Kimberly - Commissioner	Meeting Minutes	12/06/2022
PH-Hunter	Hunter, Rick – Commissioner Chair	Meeting Minutes	12/06/2022

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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 DTPP Plan-Wide 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*, the first paragraph of Section 2.4, Summary of Impacts and Mitigation Measures, page 2-5, is revised as follows to correct an editorial error:

For each of the 13 environmental topics listed above, any new significant, or substantially more severe significant, project or cumulative impacts impact and associated mitigation measure(s) identified in this SEIR plus any significant project or cumulative impact and associated mitigation measure(s) identified in the DTPP Final EIR that remain applicable to the proposed DTPP Plan-Wide Plan Amendments are summarized in **Table 2-1**. The summary table has been organized to correspond with the more detailed impact and mitigation discussions in Chapters 4 through 16 of this SEIR. The table is arranged in five columns: (1) identified impacts, (2) potential significance without mitigation, (3) recommended mitigation measures, (4) the entity responsible for implementing each mitigation measure, and (5) the level of impact significance after implementation of the mitigation measure(s). **Table 2-2, which follows Table 2-1, compares, in summary form, the impacts and mitigation measures in the DTPP Final EIR to those in this SEIR.**

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-11, third column, Mitigation Measure UT-1b is revised as follows to clarify Mitigation Measure UT-1b:

Mitigation Measure UT-1b: Water System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing water mains have sufficient pressure and flow for the project's demands (including but not limited to domestic and fire demands), prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any water system capacity-enhancing improvements needed to provide sufficient pressure and flow to meet the project's demands shall be funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-12, third column, Mitigation Measure UT-1c is revised as follows to clarify Mitigation Measure UT-1c:

Mitigation Measure UT-1c: Sanitary Sewer System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing sewer mains have sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any sewer main(s) shown to have insufficient capacity, as a result of the project's demands, pursuant to the City's Engineering Standards shall lead to sewer system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-12, third column, Mitigation Measure UT-1d is revised as follows to clarify Mitigation Measure UT-1d:

Mitigation Measure UT-1d: Stormwater System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing stormwater system has sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any stormwater main(s) shown to have insufficient capacity, as a result of the project's demands, pursuant to the City's Engineering Standards shall lead to stormwater system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-1, Summary of Potentially Significant Impacts and Recommended Mitigation Measures, page 2-13, third column, Mitigation Measure UT-8 is revised as follows to clarify Mitigation Measure UT-8:

Mitigation Measure UT-8: Should the proposed realignment and alteration of Arroyo Ojo be undertaken, the City would require the project applicant to demonstrate that there shall be no substantial increase in off-site flooding, except in the existing or proposed street network, during a modeled 30-year or 100-year storm event, compared to pre-development conditions, as determined by the City Engineer. Potential improvements have been conceptually identified to avoid the impact, develop 2-acre-feet including the incorporation into the 901 El Camino Real project of sufficient detention storage on or adjacent to the project site to reduce water levels upstream and peak flows downstream of the 901 El Camino Real project site to achieve the above standard, in accordance with City Engineering Standards a 30-year level of service. The 901 El Camino Real project is expected to include development, adjacent to the site, of a new segment of Franklin Street, between Winklebleck Street and James Avenue, to replace the existing segment of California Street between Winklebleck Street and James Avenue that would be abandoned to allow for development of the 901 El Camino Real project. It is anticipated that this new segment of Franklin Street would provide at least some of the required stormwater detention storage, essentially replacing the existing detention storage provided by the segment of California Street to be abandoned. Final design of the

improvement(s) to be undertaken as part of this mitigation measure shall be subject to review and approval by the City Engineer to ensure that the above standard for no substantial increase in flooding is met, in accordance with City Engineering Standards, and development of the approved improvement(s) shall become a condition of project approval for the 901 El Camino Real project. The volume of detention reflects the volume of stormwater flow that would be spilled from existing on-site facilities and stored in the existing street network.

Draft SEIR, Chapter 2, *Executive Summary*, Table 2-2, *Summary Comparison of Significant Impacts and Mitigation Measures: DTPP Plan-Wide Amendments and DTPP FEIR*, page 2-32, last columns of last two, Impact 15-3, is revised as follows to correct an editorial error:

DTPP Impacts	Mitigation Measure(s)	SAM	DTPP Plan-Wide Impacts	Mitigation Measure(s)	SAM	Worse?
Impact 15-3: Impacts on wildlife movement and migratory wildlife			Impact BIO-2: Implementation of the DTPP Plan-Wide Amendments would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Mitigation Measure BIO-2a (formerly Mitigation Measure 15-1(b) from the DTPP Final EIR with clarifying amendments): Project applicant/City to comply with the Redwood City Stormwater Pollution Prevention Program. Mitigation Measure BIO-2b (formerly Mitigation Measure 15-2 from the DTPP Final EIR with clarifying amendments): For projects that modify potential wetlands, riparian zones, or regulated waters, project applicant to obtain permits and approvals from applicable resource agencies and comply with required mitigation.	LS	No Yes

Chapter 3, Project Description

Draft SEIR, Chapter 3, *Project Description*, page 3-13, second to last bullet point, is revised as follows to reflect the most current information:

- Revisions to the Historic Resource Preservation Regulations (Section 2.1), including map, to acknowledge the removal, since DTPP adoption, of four historic resources, all of which had been identified in the DTPP as potentially subject to alteration, relocation, or removal. ~~In addition, guidelines would be added for the 651 El Camino Real site (APN 052-271-030) that would permit relocation or removal of the McGarvey House (649 El Camino Real), a City-identified historical resource; and~~

Chapter 7, Cultural and Historic Resources and Tribal Cultural Resources

Draft SEIR, Chapter 7, *Cultural and Historic Resources and Tribal Cultural Resources*, page 7-9, first paragraph, is revised as follows to reflect the most current information:

Within the potential future DTPP boundary extension area, there are two age-eligible properties located on the same parcel that were not identified in the NWIC records

search. The McGarvey House at 649 El Camino Real is currently listed on the Redwood City Historical Resources Inventory due to a 1994 DPR on file that considers the home not eligible for the National register, California register, or for local listing, however “may warrant special consideration in local planning.” The home has never been formally designated. Two recent evaluations have found that the McGarvey House is ~~neither~~ not a historical resource under CEQA, not ~~not~~ eligible for listing Redwood City Historical Resources Inventory, and does not meet any of Redwood City’s historic landmark designation criteria.^[fn16] The City’s Historic Resources Advisory Committee reviewed both recent evaluations and agreed with the conclusion that the home is not individually eligible as a historic resource in the California Register or as a local landmark and should not be included in the Redwood City historic inventory. Nevertheless, given this property’s existing listing on the City’s Inventory, this SEIR conservatively considers the McGarvey House to be a historical resource, at least until such time as the existing listing may be updated. The American Legion Post No. 105 at 651 El Camino Real is age eligible and was evaluated for this SEIR and determined not to be eligible the National Register, California Register, or local register.^[fn17]

Draft SEIR, Chapter 7, *Cultural and Historic Resources and Tribal Cultural Resources*, page 7-18, second paragraph, is revised as follows to reflect the most current information:

The DTPP Plan-Wide Amendments would allow additional development in the amended DTPP area, similar to the DTPP, and would therefore result in a similar impact. As described in the Environmental Setting, there are no known historic resources located within the potential future DTPP boundary extension area that are eligible for the California Register and/or the National Register. ~~However, one structure, the McGarvey House at 649 El Camino Real, is listed on the City’s Historical Resources Inventory. Therefore, development pursuant to the proposed DTPP Plan Amendments could result in a significant effect on this resource. Additionally~~ However, subsequent development pursuant to the proposed DTPP Plan Amendments could result in adverse effects to one or more resources previously identified in the DTPP Final EIR, and/or potentially to resources yet to be identified, and there are no policies in the existing DTPP or proposed amendments that would explicitly prohibit such effects. Furthermore, implementation of the DTPP Plan-Wide Amendments could result in indirect impacts from construction vibration to existing resources within the amended DTPP area, as well as to one previously identified potential historic resource that is located adjacent to the potential DTPP boundary extension area and outside of the DTPP boundaries (i.e., 701–713 Arguello Street).

^[fn16] A historic resource evaluation of the McGarvey House at 649 El Camino Real was prepared by TreanorHL in November 2021, and Environmental Science Associates prepared a peer review in January 2022. Both documents recommend that the building is not eligible for listing on the Redwood City Historical Resources Inventory or the California Register because it lacks significance under any criteria.

^[fn17] Environmental Science Associates, “Historic Resource Evaluation for 651 El Camino Real, Redwood City,” August 25, 2022.

Chapter 10, Utilities and Infrastructure

Draft SEIR, Chapter 10, *Utilities and Infrastructure*, page 10-26, Mitigation Measure UT-1b is revised as follows to clarify Mitigation Measure UT-1b:

Mitigation Measure UT-1b: Water System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing water mains have sufficient pressure and flow for the project's demands (including but not limited to domestic and fire demands), prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any water system capacity-enhancing improvements needed to provide sufficient pressure and flow to meet the project's demands shall be funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 10, *Utilities and Infrastructure*, page 10-28, Mitigation Measure UT-1c is revised as follows to clarify Mitigation Measure UT-1c:

Mitigation Measure UT-1c: Sanitary Sewer System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing sewer mains have sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any sewer main(s) shown to have insufficient capacity, as a result of the project's demands, pursuant to the City's Engineering Standards shall lead to sewer system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation

measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 10, *Utilities and Infrastructure*, page 10-30, Mitigation Measure UT-1d is revised as follows to clarify Mitigation Measure UT-1d:

Mitigation Measure UT-1d: Stormwater System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing stormwater system has sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any stormwater main(s) shown to have insufficient capacity, as a result of the project's demands, pursuant to the City's Engineering Standards shall lead to stormwater system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.

Draft SEIR, Chapter 10, *Utilities and Infrastructure*, pages 10-41 and 10-42, last paragraph before introduction of Mitigation Measure UT-8, is revised as follows to clarify the impact discussion:

Although this SEIR assumes a potential future northerly expansion of the DTPP boundary, the extended area would comprise five additional parcels on which assumed development would replace existing developed areas. Additionally, most proposed infrastructure improvements would be within existing rights of way and subject to City review, ensuring no substantial changes to drainage patterns. The one exception would be alterations and realignment of Arroyo Ojo, discussed above under Impact UT-6. The proposed improvements would result in slightly larger floodplain extents for the 30-year and 100-year design storms, compared to the existing conditions. Modeling undertaken for this SEIR indicates that, absent stormwater improvements, the changes to Arroyo Ojo could result in up to 2 acre-feet of stormwater flow in a 30-year storm event that would be spilled from existing on-site facilities, with the likelihood of additional stormwater spilled in a 100-year storm event, and that this additional stormwater would therefore have to be contained in the existing street network. ~~which~~ This would be a new potentially significant effect, compared to the DTPP Final EIR. However, this impact would be reduced to a *less-than-significant* level with implementation of Mitigation Measure UT-8.

Draft SEIR, Chapter 10, *Utilities and Infrastructure*, page 10-42, Mitigation Measure UT-8 is revised as follows to clarify Mitigation Measure UT-8:

Mitigation Measure UT-8: Should the proposed realignment and alteration of Arroyo Ojo be undertaken, the City would require the project applicant to demonstrate that there shall be no substantial increase in off-site flooding, except in the existing or proposed street network, during a modeled 30-year or 100-year storm event, compared to pre-development conditions, as determined by the City Engineer. Potential improvements have been conceptually identified to avoid the impact, develop 2-acre-feet including the incorporation into the 901 El Camino Real project of sufficient detention storage on or adjacent to the project site to reduce water levels upstream and peak flows downstream of the 901 El Camino Real project site to achieve the above standard, in accordance with City Engineering Standards a 30-year level of service. The 901 El Camino Real project is expected to include development, adjacent to the site, of a new segment of Franklin Street, between Winklebleck Street and James Avenue, to replace the existing segment of California Street between Winklebleck Street and James Avenue that would be abandoned to allow for development of the 901 El Camino Real project. It is anticipated that this new segment of Franklin Street would provide at least some of the required stormwater detention storage, essentially replacing the existing detention storage provided by the segment of California Street to be abandoned. Final design of the improvement(s) to be undertaken as part of this mitigation measure shall be subject to review and approval by the City Engineer to ensure that the above standard for no substantial increase in flooding is met, in accordance with City Engineering Standards, and development of the approved improvement(s) shall become a condition of project approval for the 901 El Camino Real project. The volume of detention reflects the volume of stormwater flow that would be spilled from existing on-site facilities and stored in the existing street network.

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 12-36, the second row under “Buildings Control Measures” is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

Control Measure	Description	Consistency Analysis
BL2: Decarbonize Buildings	BL2 seeks to reduce GHG emissions, criteria pollutants and TACs by limiting the installation of space- and water-heating systems and appliances powered by fossil fuels. This measure is to be implemented by developing model policies for local governments that support low- and zero-carbon technologies as well as potentially developing a rule limiting the sale of natural-gas furnaces and water heaters.	Consistent. Subsequent development pursuant to the proposed DTPP Plan-wide Amendments would be subject to the Redwood City Reach Codes, which require, among other things, all-electric construction for new residential and non-residential buildings with no natural gas infrastructure, and photovoltaic (PV) requirements, with only limited exceptions (including for affordable housing and commercial kitchens). In addition, PCE, a community choice aggregation, offers clean energy to City residents, and would be available to future development allowed by the proposed DTPP Plan-wide Amendments.

Draft SEIR, Chapter 12, *Air Quality*, page 12-36, the text beginning with the first full sentence of the first partial paragraph, through the end of that paragraph, is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

Exceptions may be granted if the project applicant establishes, based upon substantial evidence, that an all-electric building “is infeasible for the project due to exceptional or extraordinary circumstances particular to the project.” ~~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 Chapter 13, *Climate Change*, requires all future projects in the amended DTPP area to be all-electric (with limited exceptions). This would eliminate much of the direct air pollutant emissions from building energy use. However, inasmuch as exceptions to the all-electric requirement may be granted, up to 30 percent of the office space could be devoted to Research and Development Laboratory uses, there could likely be emissions of criteria air pollutants from non-electric space-conditioning and water-heating system and potentially from other sources, ~~as well as, potentially, emissions from natural gas in manufacturing, research, and development.~~ However, the precise nature and volume of such emissions, if any, cannot be known at this time and would be evaluated on a project-specific basis as individual project applications were received.

Draft SEIR, Chapter 12, *Air Quality*, page 12-36, footnote 40 is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

⁴⁰ City of Redwood City, 2022 ~~2020~~. Ordinance 2521 ~~2487~~ – An Ordinance of the City of Redwood City ~~Adding~~ Repealing Article XV of Chapter 9 (Buildings) of the Redwood City Municipal Code to Adopt Local Amendments to ~~2019~~ 2022 Edition of the California Energy Code and Green Building Standards Codes, Together with Certain Amendments, Exceptions, Modifications and Additions Thereto, November 30, 2022 ~~September 21, 2020~~. Available online: <http://documents.redwoodcity.org/publicweblink/0/edoc/519225/Ord%202521.pdf> <https://www.redwoodcity.org/home/showpublisheddocument/23035/637473438954470000>, accessed February 8, 2023 ~~3, 2022~~.

Draft SEIR, Chapter 12, *Air Quality*, page 12-39, the text beginning with “Significance after Mitigation” (Impact AQ-2) is reformatted as follows to correct a formatting error, so that it is clear that last two paragraphs on page 12-39, continuing onto page 12-40, are part of the discussion of “Significance after Mitigation” (there is no change to the language of the Draft SEIR):

Significance after Mitigation. The BAAQMD has taken a qualitative approach to addressing fugitive dust emissions from construction activities and considers any project that implements the best management practices in Mitigation Measure AQ-2a to not result in a significant impact with respect to fugitive dust. (New significant but mitigable impact, compared to DTPP Final EIR)

Mitigation Measure AQ-2b is expected to be effective at reducing criteria pollutant emissions from construction and operation of individual projects developed in the amended DTPP area to below the BAAQMD thresholds; however, the specific emissions

associated with future projects are not currently known, and therefore the effectiveness of emission reduction measures cannot be definitively determined. It is possible that projects with substantial ground disturbance, specialty construction equipment, or compressed and highly intensive construction schedules could exceed construction significance thresholds. Also, ROG emissions from consumer products used during project operations may remain significant because use of such products is a function of consumer choice and commercial availability.

Finally, although the mitigation measure would require emissions offsets required to reduce any criteria pollutant emissions that would exceed the thresholds of significance for these pollutants after implementation of all other feasible emission reduction measures, implementation of any emissions reduction project(s) that may be developed would be undertaken by BAAQMD and is outside the jurisdiction and control of the City and not fully within the control of the project applicants. For these reasons, criteria air pollutants from construction and operation of subsequent projects developed under the proposed DTPP Plan-Wide Amendments would result in a new and more severe impact than the impact identified in the DTPP Final EIR. This impact would conservatively be ***significant and unavoidable with mitigation***.

Chapter 13, Climate Change

Draft SEIR, Chapter 13, *Climate Change*, page 13-28, the text beneath the heading “Redwood City Reach Codes,” continuing onto page 13-29, is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

Redwood City Reach Codes

Reach Codes are amendments to the Energy and Green Building Standards Codes to reduce GHGs. Adopting Reach Codes create opportunities for local governments to lead initiatives on climate change solutions, clean air, and renewable energy. In September 2020, the Redwood City Council approved the Reach Codes ordinance (Ordinance No. 2487; City of Redwood City, 2020b) that mandates electrification, solar readiness of buildings, provision of EV charging infrastructure, and energy efficiency for all new construction projects. The 2020 Reach Codes established higher standards for new construction to provide environmental and health benefits to the community. The 2020 Redwood City Reach Codes focused on new residential, commercial, and multifamily buildings that will be seeking building permits after December 9, 2020. The ordinance ~~does~~ did not apply to additions or alterations. In November 2022, the City Council approved revisions to the Redwood City Reach Codes (Ordinance No. 2521; Redwood City, 2022b).

Specifically, the Reach Codes, as amended in 2022, requires all new construction to be all-electric buildings with no natural gas or propane plumbing installed within the building. The Codes allow for certain exceptions subject to the discretion of the City’s Building Official, within the Community Development and Transportation Department. Exceptions to the all-electric requirement may be granted only if the project applicant establishes, based upon substantial evidence, that an all-electric building “is infeasible for the project due to exceptional or extraordinary circumstances particular to the project.” ~~to 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.~~ In addition, the Reach Codes include mandatory requirements for solar ready buildings and EV charging infrastructure, with certain exceptions.^{[fn58], [fn59]}

Draft SEIR, Chapter 13, *Climate Change*, page 13-36, the text beneath the heading “Compliance with No Natural Gas Requirement” is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

Compliance with No Natural Gas Requirement

As detailed in the Regulatory Setting, the City of Redwood City has adopted Reach Codes as part of Ordinance 2487. Reach Codes are amendments to the Energy and Green Building Standards Codes to reduce GHG emissions and include requirements beyond those required by the current Energy Code. Reach Codes adopted by the City of Redwood City include a requirement for buildings seeking building permits after January 1, 2023, ~~December 9, 2020~~, to be “all-electric buildings,” with certain exceptions. An “all-electric” building as defined in Section 9.249 of the Redwood City Municipal Code (Ordinance 2521; Redwood City, 2022b) ~~9.250 of Ordinance 2487~~ 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 and clothes drying appliances. These Reach Codes go beyond the requirements in the 2022 Update to the Title 24 standards that ~~will go~~ went into effect on January 1, 2023, and the Title 24 standards establish electric-ready requirements in new homes, but do not explicitly prohibit natural gas. The Reach Codes allow exceptions to the all-electric requirement, subject to the discretion of the City’s Building Official, within the Community Development and Transportation Department, if

[fn58] City of Redwood City, 2022 ~~2020~~. Ordinance 2521 ~~2487~~ – An Ordinance of the City of Redwood City ~~Adding Repealing~~ Article XV of Chapter 9 (Buildings) of the Redwood City Municipal Code to Adopt Local Amendments to 2019 2022 Edition of the California ~~Energy Code~~ and Green Building Standards Codes, Together with Certain Amendments, Exceptions, Modifications and Additions Thereto, November 30, 2022 ~~September 21, 2020~~. Available online: <http://documents.redwoodcity.org/publicwebblink/0/edoc/519225/Ord%202521.pdf> <https://www.redwoodcity.org/home/showpublisheddocument/23035/637473438954470000>, accessed February 8, 2023 ~~3, 2022~~.

[fn59] The original 2020 Reach Codes allowed for eight exceptions to the all-electric building requirement for new construction, including for 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, as well as for infeasibility. In recommending the revised Reach Codes in 2022, City staff relied upon input from the Bay Area Reach Codes team, led by Peninsula Clean Energy (a joint powers agency established in 2016 to provide clean electricity in San Mateo County), which determined, among other things, that statewide cost-effectiveness studies had determined that found that new all-electric construction is cost-effective for all building types. Staff also noted that other local jurisdictions were considering removal of most Reach Code exceptions. (Staff Report for Redwood City City Council meeting of October 24, 2022; available at: <https://meetings.redwoodcity.org/AgendaOnline/Documents/DownloadFile/9B.%20STAFF%20REPORT%20-%20ADOPTION%20OF%20REACH%20CODES%2c%20AND%20AMENDMENTS%20TO%20THE%20FIRE%20A.pdf?documentType=1&meetingId=2346&itemId=8141&publishId=12632&isSection=False&isAttachment=True>; accessed February 8, 2023.) On November 14, 2022, the City Council was scheduled to further limit the exceptions to the all-electric buildings requirements for both residential and non-residential new construction. If the revised Reach Codes are approved, effective January 1, 2023, an exception will be granted only if an applicant “establishes by substantial evidence that an all-electric building is infeasible for the project due to exceptional or extraordinary circumstances particular to the project.”

~~the project applicant establishes, based upon substantial evidence, that an all-electric building “is infeasible for the project due to exceptional or extraordinary circumstances particular to the project.” for accessory dwelling units, non-residential buildings constructed to Office of Statewide Health Planning and Development Hospital standards, scientific laboratory areas, commercial kitchens, and new residential structures that designate 100 percent of the dwelling units to be affordable. Inasmuch as up to 30 percent of the office space could be devoted to Research and Development Laboratory uses; Accordingly, there could likely be subsequent development projects that would receive exceptions to allow for non-electric space-conditioning and water-heating system and potentially from other sources, as well as, potentially, natural gas use in manufacturing, research, and development.~~ However, the precise nature and volume of such emissions, if any, cannot be known at this time and would be evaluated on a project-specific basis as individual project applications were received.

Draft SEIR, Chapter 13, *Climate Change*, page 13-39, the text beginning with “Significance after Mitigation” (Impact CC-1) is revised as follows to reflect the November 2022 updates to the City’s Reach Codes:

Significance After Mitigation: With the implementation of Mitigation Measure CC-1, GHG emissions from future projects proposed for development within the amended DTPP area would be reduced to the extent feasible. However, as explained above, the City’s Reach Codes, adopted in September 2020 and revised in November 2022, allow for certain exceptions to the no-natural gas requirement, if the project applicant establishes, based upon substantial evidence, that an all-electric building “is infeasible for the project due to exceptional or extraordinary circumstances particular to the project.” including for affordable housing; commercial kitchens; and Research and Development Laboratory spaces. 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.”^[fn69] 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 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 2020 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. The 2020 Reach Codes included eight exceptions to the all-electric building requirement for new construction, including for 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, as well as for infeasibility. In recommending the

[fn69] This requirement is pursuant to Public Resources Code Section 25402.1(h)(2).

revised Reach Codes in 2022, City staff relied upon input from the Bay Area Reach Codes team, led by Peninsula Clean Energy (a joint powers agency established in 2016 to provide clean electricity in San Mateo County), which determined, among other things, that statewide cost-effectiveness studies had determined that found that new all-electric construction is cost-effective for all building types. Staff also noted that other local jurisdictions were considering removal of most Reach Code exceptions. (Staff Report for Redwood City City Council meeting of October 24, 2022; available at: <https://meetings.redwoodcity.org/AgendaOnline/Documents/DownloadFile/9B.%20STAFF%20REPORT%20-%20ADOPTION%20OF%20REACH%20CODES%2c%20AND%20AMENDMENTS%20TO%20THE%20FIRE%20A.pdf?documentType=1&meetingId=2346&itemId=8141&publishId=12632&isSection=False&isAttachment=True>; accessed February 8, 2023.) 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. Therefore, this SEIR considers that the full implementation of all electric building development 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***. (New significant and unavoidable impact, compared to DTPP Final EIR)

Draft SEIR, Chapter 13, *Climate Change*, Section 13.4, *References*, page 13-53, the following are revised to reflect the November 2022 updates to the City’s Reach Codes:

City of Redwood City, 2022a. Energy. Available online: <https://www.redwoodcity.org/departments/public-works/environmental-initiatives/energy-initiatives>. Accessed February 23, 2022.

City of Redwood City, 2022b. Ordinance 2521– An Ordinance of the City of Redwood City Repealing Article XV of Chapter 9 (Buildings) of the Redwood City Municipal Code to Adopt Local Amendments to 2022 Edition of the California Green Building Standards Codes, Together with Certain Amendments, Exceptions, Modifications and Additions Thereto, November 30, 2022. Available online: <http://documents.redwoodcity.org/publicweblink/0/edoc/519225/Ord%202521.pdf>, accessed February 8, 2023.

Chapter 17, Cumulative Impacts

Draft SEIR, Chapter 17, *Cumulative Impacts*, page 17-21, the first full paragraph is revised as follows to correct an editorial error:

Cumulative development projects would also be required to meet the required fire flow velocities and flow durations pursuant to the California Fire Code and Redwood City Engineering Standards, as would development in the amended DTPP area. In this regard, as explained under Impact UT-1 in Chapter 10, *Utilities and Infrastructure; Hydrology and Water Quality*, City staff has determined that the transmission and distribution systems are not sized to provide adequate flows and pressures under emergency service for future citywide development. Emergency water storage volume for emergency uses in a fire, earthquake, or a temporary shutdown of the San Francisco Public Utilities Commission Regional Water System (SFPUC RWS; wholesale water supplier to Redwood City) is also inadequate. Accordingly, Mitigation Measure UT-1a, which would require each subsequent development project in the amended DTPP area to make a fair-share contribution to development of an emergency water supply for Downtown, would also apply to cumulative development. This mitigation measure would provide for water supplies in the case of drought and disaster-caused emergencies, such as a temporary interruption of water supplies due to an earthquake. Applicants for subsequent development projects would also be required provide the City with evidence that existing water mains have sufficient pressure and flow for the project's demands (including but not limited to domestic and fire demands) (Mitigation Measure UT-1b); that existing sewer mains have sufficient capacity for the project's demands (Mitigation Measure UT-1c); and that the existing stormwater system has sufficient capacity for the project's demands (Mitigation Measure UT-1d). In each case, applicants would be required to construct any capacity enhancements required to adequately serve their project(s).

Chapter 19, Alternatives to the Proposed Project

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, page 19-19, the first full paragraph is revised as follows for clarity:

As discussed in Chapter 10, *Utilities and Infrastructure*, the proposed DTPP Plan-Wide Amendments would have less-than-significant effects with mitigation with respect to water supply. ~~Accordingly, The~~ proposed DTPP Plan-Wide Amendments would also have less-than-significant impacts with mitigation 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 DTPP Plan-Wide 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 mitigation

with respect to utilities and infrastructure (including hydrology and water quality). In particular, the Reduced Development Alternative would generate about two-thirds of the proposed DTPP Plan-Wide Amendments' water demand and likewise would result in about two-thirds of the wastewater treatment demand. Mitigation measures included to reduce the impacts of development allowed by the DTPP Plan-Wide Amendments on water supplies (Mitigation Measure UT-2) and utility infrastructure (Mitigation Measures UT-1a, UT-1b, UT-1c, and UT-1d) would similarly reduce impacts of development allowed under the Reduced Development Alternative to less than significant.

Draft SEIR, Chapter 19, *Alternatives to the Proposed Project*, page 19-25, the last paragraph, continuing onto page 19-26 is revised as follows for clarity:

As discussed in Chapter 10, *Utilities and Infrastructure*, the proposed DTPP Plan-Wide Amendments would have less-than-significant effects with mitigation with respect to water supply. The proposed DTPP Plan-Wide Amendments would also have less-than-significant impacts with mitigation 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 DTPP Plan-Wide 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 Altered Land Use Mix Alternative would likewise have less-than-significant impacts with mitigation with respect to utilities and infrastructure (including hydrology and water quality). In particular, the Altered Land Use Mix Alternative would generate about two-thirds of the proposed DTPP Plan-Wide Amendments' water demand and likewise would result in about two-thirds of the wastewater treatment demand.^[fn4] Mitigation measures included to reduce the impacts of development allowed by the DTPP Plan-Wide Amendments on water supplies (Mitigation Measure UT-2) and utility infrastructure (Mitigation Measures UT-1a, UT-1b, UT-1c, and UT-1d) would similarly reduce impacts of development allowed under the Altered Land Use Mix Alternative to less than significant.

^[fn4] Residential use generates more than four times the water demand as non-residential use, on a per-square-foot basis.

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CHAPTER 3

Comments and Responses

3.1 Introduction

This section contains copies of the written comment letters received during the public review period (November 14, 2022 through December 29, 2022) for the DTPP Plan-Wide 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 DTPP Plan-Wide Amendments and will be considered by the City decision-makers as part of the project consideration process.

3.2.1 Draft SEIR Comment Letters – Individuals

Comment Letter I-Bloomquist

From: [Cary Bloomquist](#)
To: [CD-William Chui](#)
Cc: [MGR-Melissa Stevenson Diaz](#); [CD-Mark Muenzer](#)
Subject: Re: Downtown Precise Plan (DTPP) Update: Environmental Document Now Available
Date: Thursday, December 01, 2022 5:45:27 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Mr. Chui,

I was able to review the documents...thank you for your efforts to get them to me.

Please incorporate my comments below into the public feedback section of the project:

Overall, it's a very ambitious plan, with some good restorative elements, and I do appreciate the proposed efforts to improve public transportation linkages and create more bike/ped friendly areas. The creation of fully-linked pedestrian areas and safe bicycle lanes is very important in reaching the zero emissions goals set by the City. Additional vehicular parking downtown is required, but I'm not certain the most effective way to implement the parking plan...it's a big challenge.

1

Despite the potential benefits of the plan, I do not support implementation of the plan as presented.

California, and most of the world, faces water shortages. Simply put, we do not have adequate water supply to sustain further development. Global climate change has created an entire new arena, and we must adapt and change to our new constrictions. Living here in Europe, I see the same challenges, and each Country in Europe has reacted differently, but most support no or little new development (defined as adding new square feet, not redevelopment of existing sites.) Water is a limiting factor here and globally, and it makes no sense to create additional square footage requiring additional water when we do not have a sustainable supply of water.

2

Energy is the other limiting factor. We simply do not have adequate supply of sustainable, reliable energy without adding additional nuclear power plants or burning more fossil fuels, which again does not support attaining zero emissions, the goal set by City Council. Solar, wind, tidal, geothermal...all renewable, sustainable sources of relatively clean energy, simple are not adequate to meet the supply demands set by new development.

3

I do appreciate being given the opportunity to express my thoughts/concerns. As a retired civil servant with 30 year of public service (20 in Public works) I do feel qualified in stating my concerns. My passion in retirement is sustainable living, and I know the Environmental Sustainability Coordinators for the Town of Atherton and the City of Mountain View. My research and conversations with other professionals in this field, along with my own extensive experience, should qualify my opinion as expert.

Sincerely,

Cary Bloomquist

Responses to Comments from Cary Bloomquist – December 1, 2022 Letter

Comment I-Bloomquist-1

The commenter expresses support for certain elements of the proposed Redwood City DTPP Plan-Wide Amendments, including enhancements to connectivity for non-auto modes of travel.

Response I-Bloomquist-1

The commenter's support for the proposed project is noted. No further response is required.

Comment I-Bloomquist-2

The commenter raises concern for the project in light of drought conditions and does not support any net increase in square footage that require additional water supply.

Response I-Bloomquist-2

Concerning water supply and 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 DTPP Plan-Wide Amendments and reasonably foreseeable future development under normal, dry and multiple dry years. Impact UT-2 summarized the results of a Water Supply Evaluation (WSE) prepared in support of the Draft SEIR for the proposed DTPP Plan-Wide Amendments, modeled on the requirements of SB 610. The WSE considered both potable and recycled water uses in the project water projections. The WSE took into account that 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 WSE 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 DTPP area would be required to comply with the California Green Building Standards Code (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 DTPP Plan-Wide Amendments.

Please see also Response PH-Hunter-1, page 3-18, below, for more detail on the SEIR's analysis of water demand associated with the proposed DTPP Plan-Wide Amendments and the SEIR's ultimate conclusion that the project's effects related to water supply would be less than significant with implementation of Mitigation Measure UT-2.

Comment I-Bloomquist-3

The commenter indicates that existing sustainable energy sources are not adequate to support new development.

Response I-Bloomquist-3

Concerning the adequacy of existing sustainable energy sources to support new development, this is not a topic that is not required to be addressed in the Draft SEIR. Chapter 13, Climate Change, includes an analysis of the Redwood City DTPP Plan-Wide Amendments' impacts with respect to energy consumption/efficiency. Existing energy consumption, including resource type, at the state, regional, and local level are described on pages 13-9 through 13-13. In addition, federal, state, regional, and local policies that aim to reduce dependency on non-sustainable energy sources are discussed in Section 13.2, Regulatory Setting, beginning on page 13-13. As noted on page 13-24, the 2022 California Energy Code, which became effective on January 1, 2023, encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. Specifically, Section 140.10 of the 2022 Energy Code requires the installation, in new multi-family residential buildings of four stories or more and in many commercial buildings, of photovoltaic (solar) panels and battery storage systems (multi-family residential buildings of three stories or less must install solar panels and electrical equipment to make them "battery-ready"). The Code also, among other requirements, establishes efficiency measures for lighting, building envelope, HVAC, and ventilation for indoor air quality. These and other measures in the 2022 Energy Code will reduce net new energy use in multifamily and nonresidential buildings.

As discussed on page 13-30, Appendix G of the CEQA Guidelines states that a significant energy impact could occur if a project would "cause wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation"; or "conflict with or obstruct a state or local plan for renewable energy or energy efficiency". These two significance criteria are discussed under Impact CC-3 (pages 13-45 through 13-49) and Impact CC-4 (pages 13-49 through 13-50); the Draft SEIR concluded that, based on the two significance criteria indicated above, energy impacts would be less than significant and that no mitigation measures are required.

The CEQA Guidelines do not require a project to demonstrate that there are adequate sustainable energy supplies available to support its proposed development. The development and maintenance of the energy supply is a statewide and regional effort, and is therefore addressed through statewide and regional planning efforts that are outside the purview of this Draft SEIR. However, the comment is noted, and will be forwarded to the City decisionmakers for their consideration.

3.2.2 Draft SEIR Public Hearing Summary

**CITY OF REDWOOD CITY
PLANNING COMMISSION
REGULAR MEETING
MINUTES**



MEETING LOCATION

In Person:
City of Redwood City
Council Chambers
1017 Middlefield Road
Redwood City, CA 94063

**December 6, 2022
6:00 PM**

Virtual via Zoom:
redwoodcity.zoom.us
Meeting ID: 930 4536 6921

www.redwoodcity.org/pc

APPROVED

COMMISSIONERS PRESENT: Commissioner Bondonno (joined via Zoom), Commissioner Chu, Commissioner Koch, Vice Chair Crnogorac, and Chair Hunter

COMMISSIONERS ABSENT: Commissioner Espinoza, Commissioner Sturken

STAFF PRESENT: Assistant Community Development & Transportation Director and Planning Commission staff Liaison Exline, Senior Planner Chui, Contract Senior Planner Northart, Assistant City Attorney Beyers, Administrative Secretary Mateo, and Planning Secretary and Meeting Host Ira

GUESTS: Karl Heisler, ESA CEQA Consultant; Franziska Church Principal Fehr & Peers Transportation Consultant; Joshua Jewett, Toby Long Design; Toby Long, AIA; Daniel Doporto, Law Office of Daniel P. Doporto; Alexandra Barnhill, Jarvis Fay, LLP

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**
2. **PUBLIC COMMENTS ON THE APPROVAL OF MINUTES, CONSENT ITEMS, APPOINTMENTS TO THE HISTORIC RESOURCES ADVISORY COMMITTEE, MATTERS OF COMMISSION INTEREST AND ITEMS NOT ON THE AGENDA:**

No Comments
3. **APPROVAL OF MINUTES:**
 - A. **Draft – November 1, 2022**

M/S (Crnogorac/Chu) to approve the Draft Minutes of November 1, 2022 as submitted

Roll Call - Motion Passed 4-0 (Bondonno abstain)

B. Draft – November 15, 2022

M/S (Crnogorac/Koch) to approve the Draft Minutes of November 15, 2022 as submitted

Roll Call - Motion Passed 4-0 (Bondonno abstain)

4. CONSENT CALENDAR: No Items

5. PUBLIC HEARING

A. Public Hearing to receive comments on the Draft Subsequent Environmental Impact Report (DSEIR) for the Downtown Precise Plan Plan-Wide And General Plan Amendments

Senior Planner Chui gave a presentation on the meeting purpose, background on the Gatekeeper process, additional development assumptions studied, residential capacity and potential boundary extension, and DTPP amendments.

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

COMMISSIONER QUESTIONS

Vice Chair Crnogorac asked if there are any open spaces that is currently in the DTPP that is planned to be converted for development.

Mr. Chui stated that there is one site that is associated with the 901 El Camino project, which includes Little River Park, although the project would plan to include replacement daylighted creek as part of the project as well as replacement open space.

Vice Chair Crnogorac asked if Little River Park is city property.

Mr. Chui stated that he is not sure.

Planning Commission staff liaison Exline stated that she believes it is.

Commissioner Chu asked what the boundaries are for calculating VMT.

Franziska Church, Principal Fehr & Peers Transportation Consultant stated that they take the area of the DTPP within a model to approximate the boundary and then estimate the VMT for all of the DTPP area and compare it to the city as well as the county, depending on the metric that they are evaluating.

Mr. Heisler stated that each EIR includes the other plan's proposed development in its cumulative analysis.

Mr. Chui stated that the DTPP amendments, as they are currently drafted, assume the transit district approval as part of the amendments that are currently drafted.

Chair Hunter asked if the new parks that are being proposed will be included in the analysis of sensitive receptors.

Mr. Heisler stated that parks are not generally considered sensitive receptors because people don't spend as much time there as they do at home, which is where the bulk of sensitive receptors are.

Commissioner Chu asked what the primary sources are that are entered into noise calculations.

Mr. Heisler stated that it is vehicle traffic, building mechanical equipment, rooftop equipment, and there is a separate category that addresses construction related noise.

Commissioner Chu asked what fraction of the calculated noise is due to motor vehicles.

Mr. Heisler stated that he is not sure he can give a number because it varies dramatically by location.

PUBLIC HEARING

Open Public Hearing

PH-Brandt-1 | Adrian Brandt voiced support of rooftop entertainment. He stated that he hopes that they can look at a way to put a roof on the flooding retention pond so it can be active use on top and make use of those two acres.

PH-Babbitt-1 | Glenn Babbitt, HRAC Member asked if historic resource impact is on specific structures listed on the historic landmarks designation list or does it include spatial areas, such as Stambaugh-Heller. He asked what issues are being addressed regarding historic resource impact.

Close Public Hearing

COMMISSION DISCUSSION

PH-Crnogorac-1 | Vice Chair Crnogorac extended Mr. Babbitt's question regarding historic resource impacts.

Mr. Heisler stated that the definition includes a building that gets altered or demolished that is a historical resource and historic districts.

Mr. Chui stated that the DTPP includes a historic preservation chapter and includes identified resources that are in the precise plan boundary as well as historic districts, and there are mitigation measures for development on each of those historic resources and guidelines that has mitigation for projects that are adjacent to a historic resource or district.

PH-Crnogorac-2 | Vice Chair Crnogorac asked about the two-acre storage and if there is a mitigation measure and what the plans are for that.

Mr. Chui stated that he is not sure he has the information right now, but it is something that they will ask clarification from the engineering team.

PH-Chu-1 [Commissioner Chu stated that it is important that they compare the emissions of these projects as if people lived somewhere else, because if the project were not implemented, these people would not disappear. She stated that shadow is not always an adverse condition, but rather is often seen as an amenity. Commissioner Chu stated that there is a growing body of research showing that traffic noise pollution causes adverse health effects. She stated that if they reduce VMT it will reduce noise exposure. She voiced support of the rooftop activation.

PH-Koch-1 [Commissioner Koch asked if they have an idea as to when the city will decide if the downtown will be an appropriate area for R&D labs and not just offices.

Mr. Chui stated that the EIR currently studies about 30% of the total office as R&D lab and they are evaluating that and anticipating that R&D lab would be a conditional use in the downtown general area of the DTPP.

PH-Crnogorac-3 [Vice Chair Crnogorac stated that the pond at Little River Park includes open space and habitat and should either be preserved or a replacement similar open space be provided. He said that that elimination of this open space would be considered a significant unavoidable impact.

PH-Hunter-1 [Chair Hunter voiced concern regarding the jobs/housing ratio and recommended that they consider the altered land use mix alternative, and as a second choice the reduced development alternative. He stated that the utilities and infrastructure mitigation measures address delivery of but not the supply and capacity.

Responses to Comments from Public Hearing Summary – December 6, 2022 Letter

Comment PH-Brandt-1

The commenter voiced support of rooftop entertainment. He stated that he hopes that they can look at a way to put a roof on the flooding retention pond so it can be active use on top and make use of those two acres.

Response PH-Brandt-1

No response is required. However, this comment is noted, and will be forwarded to the City decision-makers for their consideration. Regarding the comment about a potential flood retention facility, it is noted that no design has been developed for any such potential facility. Furthermore, it is not the case that, for example, 2 acre-feet of stormwater storage would necessitate the use of 2 acres of land. This is because 2 acre-feet represents a volume, not an area. For example, 2 acre-feet of storage could be accommodated in a one-tenth of acre (4,356-square-foot, or 66 feet square) tank that is 20 feet deep.

Comment PH-Babbitt-1

The commenter is a member of the Historic Resources Advisory Committee. The commenter asked if the SEIR's identification of potential new or more severe impacts to historic resources refers to effects on specific structures on the City's list of historic landmarks designation list or whether it also includes larger areas, such as the Stambaugh-Heller Historic District. He asked what specifically is being addressed regarding the historic resource impact, and why the SEIR identified a new or more severe impact.

Response PH-Babbitt-1

The Draft SEIR identified a new or more significant impact with respect to historical resources [Impact CR-1] because, as stated on Draft SEIR page 7-18, "development pursuant to the proposed DTPP Plan Amendments could result in adverse effects to one or more resources previously identified in the DTPP Final EIR, and/or potentially to resources yet to be identified, and there are no policies in the existing DTPP or proposed amendments that would explicitly prohibit such effects." As explained by Planning staff during the public hearing, because the DTPP includes a historic preservation chapter that contains standards and guidelines with respect to identified historical resources within the DTPP area, the DTPP itself includes measures to avoid or reduce potential impacts to these known historical resources. Accordingly, the Draft SEIR conclusion that the impact would be newly significant and unavoidable is largely driven by the potential for subsequent development to adversely affect potential but as-yet unidentified resources. As further explained by the SEIR consultant, in addition to potential adverse effects resulting from demolition or alteration of a historical resource, subsequent development could adversely affect adjacent or nearby historical resources, and could also potentially affect the Main Street Historic District (largely within the DTPP area) and the Mezesville Historic District (adjacent to the DTPP area on the north). Because the closest building within the Stambaugh-Heller Historic District is some 500 feet from the DTPP area, no adverse effects are likely there.

Comment PH-Crnogorac-1

The commenter posed Mr. Babbitt's (PH-Babbitt-1) question regarding historic resource impacts to the SEIR consultant.

Response PH-Crnogorac-1

Please see the preceding Response PH-Babbitt-1.

Comment PH-Crnogorac-2

The commenter asked about the 2 acre-foot of stormwater storage and if there is a mitigation measure and what the plans are for that.

Response PH-Crnogorac-2

As stated on Draft SEIR page 10-40, the Gatekeeper project at 901 El Camino Real proposes relocation and alteration of approximately 170 feet of existing culvert and approximately 170 feet of existing open creek (Arroyo Ojo, a small creek that is otherwise completely culverted within downtown Redwood City). As explained on page 10-41 (Impact UT-8), this change would result in increased flooding because additional stormwater would be spilled into the existing street network. The Draft SEIR identifies Mitigation Measure UT-8 (revised herein; see Chapter 2, Revisions to the Draft SEIR) that would avoid any substantial increase in off-site flooding during a 30-year or 100-year storm event, except in the existing or proposed street network, as determined by the City Engineer in accordance with City Engineering Standards. This would reduce the impact to a less-than-significant level, meaning that there would be no new or substantially more severe impact than identified in the DTPP Final EIR. It is noted that no design exists as of yet for facilities that would be required by Mitigation Measure UT-8. Any such flood mitigation improvements would be designed and implemented, and subject to City review and approval as a condition of project approval, as part of project-specific consideration and development of the proposed 901 El Camino Real project. While the City Engineer or Designee would be responsible for approval of flood mitigation improvements, other aspects of the potential relocation and alteration of a segment of Arroyo Ojo would also be subject to review and approval by federal, state, and regional agencies, including the U.S. Army Corps of Engineers, the California Department of Fish and Wildlife, and the Regional Water Quality Control Board, as is set forth in Draft SEIR Mitigation Measure BIO-2b.

Please see also Response PH-Brandt-1, above.

Comment PH-Chu-1

The commenter stated that it is important that they compare the emissions of these projects as if people lived somewhere else, because the projected population and employment growth that could be accommodated by the proposed DTPP Plan-Wide Amendments would not simply "disappear" if the project were not implemented; rather, these residents and jobs would locate elsewhere.

Response PH-Chu-1

The Draft SEIR acknowledges the commenter’s point in Chapter 19, *Alternatives*. In the discussion of the environmentally superior alternative (Section 19.7, page 19-27), the Draft SEIR states that the Reduced Development Alternative would be considered the environmentally superior alternative. However, the Draft SEIR continues, “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.” While the Draft SEIR notes that it would be speculative to quantify or identify the alternate location(s) of such development, it does acknowledge that, while 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. This alternative could also incrementally increase impacts related to ‘greenfield’ development on previously undeveloped locations in the Bay Area and, possibly, beyond.”

Comment PH-Chu-2

The commenter stated that sidewalk shadows are often seen as an amenity, not an adverse condition, in cities with warmer climates. Therefore, especially given Redwood City’s “303-day growing season,” shadow should be viewed as shade, which is often beneficial.

Response PH-Chu-2

The comment is acknowledged. The Draft SEIR’s analysis of shadow (Impact AE-5, page 6-13) explicitly addresses shadow effects on certain DTPP open spaces, parcels with lower permitted building heights, residential properties adjacent to the DTPP area, light-sensitive historic building features, and historic building facades. As explained on page 6-13, this analysis was added to the original DTPP Final EIR as a result of a Superior Court judgment. Appendix 2 of the DTPP itself identifies the “shadow-sensitive” open spaces within the DTPP area. While acknowledging that shadow is not normally considered a CEQA impact, the Draft SEIR analysis relied on the same threshold as the DTPP Final EIR—more than 50 percent shadow on any of the above-noted spaces or buildings at 12:00 noon on the spring equinox. The DTPP Final EIR concluded that this threshold “represents a reasonable balance between sun and shade, recognizing that shade may also be desirable during hotter times of the day and year” (Draft SEIR page 6-13). The Final EIR went on to determine that “full buildout of the DTPP to the maximum building envelopes allowed by the Plan’s regulations would not cause any shadow-sensitive uses and spaces to be more than 50 percent in shadow at 12:00 p.m. PST on the Spring Equinox, and thus would not substantially degrade the quality of the environment nor cause substantial adverse effects on human beings,” and therefore the effect would be less than significant (DTPP Final EIR, page 6-32).

Relying on the same significance standard as the DTPP Final EIR, the SEIR found that, because the proposed DTPP Plan-Wide Amendments offer the potential for exceptions to height stepdown requirements or side setback requirements in certain cases, “bulkier buildings than originally anticipated under the DTPP could be developed, some of which could cast new shadow on public

parcs, plazas, and open space areas within Downtown, Downtown parcels with lower maximum permitted building heights adjacent to parcels with higher maximum permitted heights; residential properties located outside but adjacent to the amended DTPP area; light-sensitive features on historic resources; and historic facades.” The Draft SEIR found that this new shadow could potentially increase shade on more than 50 percent of one or more of the features at noon on the Spring Equinox, which would represent a potentially significant impact (SEIR, page 6-14). Accordingly, the SEIR identified Mitigation Measure AE-5, Shadow Study for Exceptions to Building Placement and/or Building Height and Disposition Regulations (SEIR, page 6-14). This measure would require that project applicants seeking certain exceptions to building placement and/or building height and disposition regulations demonstrate to the City that the exceptions sought would be consistent with section 2.7.5 of the DTPP and would not result in shadow exceeding 50 percent on the shadow-sensitive uses and spaces identified therein at noon on the Spring Equinox.”² The Draft SEIR concluded that, with implementation of Mitigation Measure AE-5, the potential shadow impact would be less than significant.

Additionally, as noted by Commissioner Crnogorac, in counterpoint to this comment, some people do seek out sunlight, particularly during times of the year when temperatures are lower.

Comment PH-Chu-3

The commenter estimated that 80 percent of noise pollution comes from vehicle traffic and stated that there is a large and growing body of research indicating that traffic noise pollution has adverse health effects. She stated that if the project results in reduced VMT [vehicle miles traveled], it will reduce emission exposure.

The commenter also voiced support of the rooftop activation.

Response PH-Chu-3

Traffic noise does frequently represent a substantial, sometimes dominant, share of ambient noise, particularly in urban environments. That said, the contribution of traffic noise to ambient noise at any given receptor (residence, school, park, etc.) varies with the distance to nearby streets and the volume of traffic on those streets. As for health effects of noise, the commenter is correct as to research having identified adverse health effects from environmental noise, and specifically from traffic noise. In the United States, the U.S. Environmental Protection Agency established an Office of Noise Abatement and Control in the 1970s; however, funding for this office was eliminated in the 1980s in favor of transferring most noise regulation to state and local governments. Accordingly, while research has been and is being undertaken at U.S. academic institutions, there is little centralized noise control activity at the national level. In contrast, in Europe, the World Health Organization (WHO) has been active in promulgating noise guidelines to protect people from harmful exposure to environmental noise. In particular, with respect to traffic noise, WHO has identified adverse consequences of exposure to high levels of noise produced by road traffic, including increased cardiovascular disease, sleep disturbance, and annoyance. Evidence of other effects, including increased risk of high blood pressure and

² Mitigation Measure AE-5 does not apply to parcel(s) with lower height limits that are subsequently developed.

cognitive impairment, was found to be less robust. WHO recommended further research into effects of transportation noise on both children and adults (WHO, 2018).

In terms of avoiding adverse effects of traffic noise, as stated on Draft SEIR page 11-14, the California Building Code includes the California Noise Insulation Standards, which requires that an interior day-night noise level of 45 decibels (45 dBA, CNEL) be met in any habitable area of newly constructed multi-family residential buildings. The noise standards—enforced by the local jurisdiction as part of the permit process—require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard where existing ambient noise are levels greater than 60 dBA CNEL. Inasmuch as the standards require meeting a fixed interior noise level, areas with higher traffic volumes typically necessitate greater noise insulation in new residential construction than do areas of lesser amounts of traffic.

The Draft SEIR, in Impact NO-2 (page 11-22), determined that traffic noise resulting from implementation of the DTPP Plan-Wide Amendments would increase by less than 3 decibels (dBA) at all locations evaluated. Because a 3-dBA increase is the level considered barely perceptible in laboratory environments, traffic noise generated by subsequent projects under the DTPP Plan-Wide Amendments would not result in a substantial permanent increase in ambient noise levels. Therefore, the Draft SEIR concluded (page 11-27) that effects from traffic noise would be less than significant and would not result in a new or substantially more severe impact than identified in the DTPP Final EIR.

The comment in support of active rooftop uses is acknowledged. No response is required.

Comment PH-Koch-1

The commenter asked if they have an idea as to when the city will decide if the downtown will be an appropriate area for R&D labs and not just offices.

Response PH-Koch-1

The Draft SEIR analysis assumes that 30 percent of the total office would be developed as R&D lab. Planning staff anticipates that R&D lab would be a conditional use in the Downtown General area of the DTPP; however, this issue will return to the Planning Commission at a later date.

Comment PH-Crnogorac-3

The commenter stated that the pond at Little River Park includes a public open space with trees, other greenery, and wildlife (ducks) that is used by the public. The commenter opined that elimination of this biological resource should be considered a significant and unavoidable impact and that the open space should either be preserved or a replacement similar open space be provided.

Response PH-Crnogorac-3

As explained in Chapter 3, *Project Description*, on Draft SEIR page 3-18, one of the proposed Gatekeeper projects, at 901 El Camino Real, has proposed alteration of the short daylighted segment of Arroyo Ojo (a branch of Redwood Creek) along which is Little River Park. That project applicant has proposed:

relocating and altering approximately 170 feet of existing culvert and approximately 170 feet of existing open creek (Arroyo Ojo, a small creek that is otherwise completely culverted within downtown Redwood City) and providing a replacement public open space that otherwise meets the DTPP purpose and goals. Under this proposal, the northernmost portion of the existing daylighted creek would be placed in a culvert, while the existing culverted portion of the creek, between California Street and El Camino Real, would be relocated and daylighted.

The alterations described above would necessitate separate project-specific consideration and approval by the City following certification of this SEIR and approval of the DTPP Plan-Wide Amendments. Nevertheless, the Draft SEIR evaluates, at a program level, the potential impacts of these improvements. With respect to biological resources, the Draft SEIR notes, on page 15-2, that the “approximately 170-foot segment [of Arroyo Ojo] features steep banks with mature trees and degraded vegetation, but provides habitat for migratory birds and other common wildlife species,” but also states, on page 15-12, in Impact BIO-2, that the riparian habitat along Arroyo Ojo is degraded and also contains non-native upland vegetation. Moreover, the open segment of Arroyo Ojo is “too fragmentary” to constitute a corridor for wildlife movement (page 15-5). Because of the degraded condition of Arroyo Ojo, the Draft SEIR finds that, with mitigation, the alterations to Arroyo Ojo would neither have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species (Impact BIO-1, page 15-11) nor have a substantial adverse effect on any riparian habitat or other sensitive natural community (Impact BIO-2, page 15-12). Applicable mitigation includes Mitigation Measure BIO-1 (consultation with federal and state resource agencies to avoid or mitigate special-status creekside species); Mitigation Measure BIO-2 (avoidance of adverse effects to nesting birds); Mitigation Measure BIO-2a (compliance with the Redwood City Stormwater Pollution Prevention Program to avoid stormwater pollution of Redwood Creek); and Mitigation Measure BIO-2b (obtain approval and applicable permits from federal and state resource agencies for modifications to potential wetlands, riparian zones, or regulated waters). With implementation of these measures, effects due to potential future alteration of Arroyo Ojo would be less than significant and would not be more severe than impacts identified in the DTPP Final EIR.

With respect to the availability of open space, as explained in the Project Description excerpt above, the potential alterations to Arroyo Ojo would relocate and retain a portion of open creek. Additionally, the proposed 901 El Camino Real project would provide replacement on-site open space.

Comment PH-Hunter-1

The commenter voiced concern regarding the jobs/housing ratio that would result from implementation of the proposed DTPP Plan-Wide Amendments. He stated that Plan-area shortfall in housing relative to employment would contribute to a region-wide jobs/housing imbalance and indirectly cause involuntary displacement due to increased housing costs and the unaffordability of housing. The commenter recommended that the City consider the Altered Land Use Mix Alternative, which has a job/housing ratio comparable to that in the original DTPP. The

commenter added that, as a second choice, he would support the Reduced Development Alternative.

The commenter also stated that the utilities and infrastructure mitigation measures address delivery of water, but not the supply and capacity of the water system.

Response PH-Hunter-1

The commenter's support for the Altered Land Use Mix Alternative and the Reduced Development Alternative is noted. No response is required.

Regarding the concern over the potential for involuntary displacement of existing residents, this topic is discussed in Draft SEIR Chapter 5, *Population and Housing*, beginning on page 5-13. As explained there:

Indirect displacement of residents is occurring throughout the Bay Area as a result of regional housing and economic trends, and could result from additional development and infrastructure investments. However, predicting the extent to which displacement may occur as a result of planned growth is extremely difficult. Also, according to the University of California, Berkeley Displacement Project, there is currently no credible methodology for attributing displacement to specific projects.^[fn31] It would be speculative to determine with any specificity the amount of a housing price increase or indirect displacement that could be attributed to any single project aligned with planned growth, particularly as the region as a whole experiences a strengthening economy region-wide and increasing housing demand resulting from the inability of regional housing supply to keep pace with demand.

As further explained in the Draft SEIR, "From a CEQA perspective, the relevant inquiry is whether there are reasonably foreseeable secondary, *physical* effects of indirect displacement, such as additional VMT, greenhouse gas (GHG) emissions, and air pollutant emissions as displaced residents are forced to locate replacement housing elsewhere and have longer commutes" (emphasis added). The Draft SEIR fully analyzes these topics in their respective chapters. Because it would be speculative to attribute a definite amount of indirect displacement to the proposed DTPP Plan-Wide Amendments, and then to attempt quantify the secondary impacts of that displacement with respect to increased VMT, GHG, and air pollutant emissions, and because CEQA does not require speculation, no further response is required.

It is noted, in terms of the future development of new housing in Redwood City, that the City's recently adopted Housing Element Update identifies the potential for 6,258 new housing units that would count towards meeting the City's Regional Housing Needs Allocation (RHNA), as established by the Association of Bay Area Governments. This represents more than 135 percent of

[fn31] Chapple, K., and M. Zuk, Miriam. Forewarned: The Use of Neighborhood Early Warning Systems for Gentrification and Displacement. *Cityscape: A Journal of Policy Development and Research* 18(3), 2016. Available at <https://www.huduser.gov/portal/periodicals/cityscpe/vol18num3/ch5.pdf>.

the City’s RHNA. Additionally, the Housing Element sets forth additional programs that could result in an additional 765 housing units, for a total of more than 150 percent of the RHNA.

Concerning the Draft SEIR’s analysis of utilities, and specifically of water supply, the commenter is correct that Impact UT-1 (page 10-24) is concerned with the adequacy of utility delivery infrastructure. However, Impact UT-2 (page 10-31) does address water supply. The analysis concludes that the City would have adequate water supplies to support the development that would be anticipated to occur pursuant to the DTPP Plan-Wide Amendments, but only with mitigation in the form of extending the City’s recycled water distribution infrastructure to subsequent development projects within the DTPP area (Mitigation Measure UT-2, page 10-32). While Mitigation Measure UT-2 would not “create” new supplies of potable water, it would effectively allow for a considerably lesser amount of potable (drinkable) water to support a larger amount of development than would be the case under existing conditions. This is because, based on the City’s adopted Urban Water Management Plan, as derived from on historical meter readings for existing dual plumbed projects, office and R&D Laboratory land uses are assumed to use potable water for only 20 percent of indoor water supply, while recycled water would supply 80 percent of indoor use. For residential uses, the potable/recycled water ratio for indoor water use is estimated to be 70/30 percent. Additionally, all outdoor water use is assumed to be recycled water, as is required by the City’s Municipal Code. Because the City’s recycled water distribution system does not currently serve the DTPP area, implementation of Mitigation Measure UT-2 is necessary to avoid a shortfall in water supply that would otherwise result in a more severe impact than was identified in the DTPP Final EIR. (The City’s Municipal Code already requires new development in the DTPP area to be dual-plumbed to allow use of both potable and recycled water.)

3.3 References

World Health Organization (WHO), Regional Office for Europe, *Environmental Noise Guidelines for the European Region*, 2018. Available at:
https://www.euro.who.int/__data/assets/pdf_file/0008/383921/noise-guidelines-eng.pdf.
 Accessed January 26, 2023.

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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 DTPP Plan-Wide Amendments. The MMRP includes the mitigation measures identified in the SEIR which are required to address the significant impacts associated with the proposed DTPP Plan-Wide 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 DTPP Plan-Wide 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 amended DTPP area (checked on plans, in reports, and in the field prior to construction).

TABLE 4-1
DTPP PLAN-WIDE AMENDMENTS MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Aesthetics and Shadow				
Mitigation AE-5: Shadow Study for Exceptions to Building Placement and/or Building Height and Disposition Regulations: Project applicants seeking exceptions to building placement and/or building height and disposition regulations in the DTPP such as exceptions to a build-to-corner, building setback, frontage coverage, height stepdown, or any other building placement or height or disposition regulation that would allow greater building massing than would otherwise be permitted shall demonstrate to the Redwood City Planning Services Division that the exceptions sought would be consistent with section 2.7.5 of the DTPP and would not result in shadow exceeding 50 percent on the shadow-sensitive uses and spaces identified therein at noon on the Spring Equinox, except that this requirement shall not apply to Downtown parcels with lower maximum permitted building heights adjacent to parcels with higher maximum permitted heights if the parcel(s) with lower height limits are the site of development subsequent to DTPP adoption.	Project Applicant, City	Planning staff to review and approve applicant-provided shadow study	City	Prior to project planning approval
Cultural Resources				
Mitigation Measure CR-1 (formerly Mitigation Measure 7-2 from the DTPP Final EIR with clarifying amendments): For any discretionary project involving an amended DTPP area that contains a historic resource, including the seven properties which the DTPP identifies as historic properties which may be altered, relocated or removed, the City shall make a preliminary determination as to whether or not the project may have a potentially significant adverse effect on the historic resource. If the City determines that the project may have a potentially significant effect, the City shall require the applicant to implement, to the extent feasible, the following mitigation measures. a) If feasible, the applicant shall, to City satisfaction, ensure that the project adheres to one or both of the following standards: <ul style="list-style-type: none"> Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings; or Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer, 1995). The project shall be reviewed by a qualified architect or architectural historian approved by the City and meeting the Secretary of the Interior's Professional Qualifications Standards published in the Code of Federal Regulations (36 CFR part 61), who shall make a recommendation to the City's Historic Resources Advisory Committee as to whether the project fully adheres to the Secretary Standards for Rehabilitation, as well as to whether any specific modifications are necessary to do so. The final determination as to a project's adherence to the Standards for Rehabilitation shall be made by the Historic Resources Advisory Commission or the body with the final decision-making authority over the project.	Project Applicant, qualified architect or architectural historian, City Historic Resources Advisory Committee, Planning Commission, and/or City Council	1. Review proposed development for potential impacts if adjacent to a historic resource 2. If potential for significant impact exists, require applicant to undertake stepwise mitigation, as feasible (measures a, b, c/d/e/f).	City	1. For (a), prior to project planning approval 2. For (b), determination prior to planning approval, and completion prior to issuance of grading or building permit. 3. For (c), prior to issuance of grading or building permit 4. For (d), (e), (f), prior to issuance of certificate of occupancy

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Cultural Resources (cont'd.)				
Mitigation Measure CR-1 (cont'd.)				
<p>b) If measure (a) is not feasible, and if relocation of the historic resource is a feasible alternative to demolition, the historic resource shall be moved to a new location compatible with the original character and use of the historical resource, and its historic features and compatibility in orientation, setting, and general environment shall be retained, such that the resource retains its eligibility for listing on the California Register.</p> <p>If neither measure (a) nor measure (b) is feasible, the City shall, as applicable and to the extent feasible, implement the following measures in the following order:</p> <p>c) Document the historic resource before any changes that would cause a loss of integrity and loss of continued eligibility. The documentation shall adhere to the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The level of documentation shall be proportionate with the level of significance of the resource. The documentation shall be made available for inclusion in the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) Collections in the Library of Congress, the California Historical Resources Information System and the Bancroft Library, as well as local libraries and historical societies, such as the Redwood City Public Library.</p> <p>d) Retain and reuse the historic resource to the maximum feasible extent and continue to apply the Standards for Rehabilitation to the maximum feasible extent in all alterations, additions and new construction.</p> <p>e) Through careful methods of planned deconstruction to avoid damage and loss, salvage character-defining features and materials for educational and interpretive use on-site, or for reuse in new construction on the site in a way that commemorates their original use and significance.</p> <p>f) Interpret the historical significance of the resource through a permanent exhibit or program in a publicly accessible location on the site or elsewhere within the DPP area.</p>				
<p>Mitigation Measure CR-2 (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.</p>	Project Applicant, qualified architect or architectural historian, City Historic Resources Advisory Committee	<ol style="list-style-type: none"> 1. Review proposed development for potential impacts if adjacent to a historic resource 2. Incorporate design modifications to avoid a "substantial adverse change" and include conditions of project approval 	City	Prior to project planning approval

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Cultural Resources (cont'd.)				
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-3 (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 DTPP Plan-Wide 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 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>	City Community Development and Transportation Department, City Building Department, qualified archaeologist, construction contractor	<ol style="list-style-type: none"> 1. In the event any deposit of prehistoric or historic archaeological materials are encountered. Implement consultation and data recovery plan in the measure. 2. Confirm that the development applicant has required construction crews to undergo training 	City	<ol style="list-style-type: none"> 1. During soil-disturbing activities 2. Prior to issuance of grading permit

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Cultural Resources (cont'd.)				
Mitigation Measure CR-3 (cont'd.)				
<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> <p>b) Prior to the issuance of grading permits within the amended DTPP 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 amended DTPP area will be subject to applicable CEQA review and evaluation requirements, and to the extent that such projects are found to have the potential to disturb or destroy archaeological resources, appropriate mitigation measures would be required to address any identified significant impacts.</p>				

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Utilities and Infrastructure; Hydrology and Water Quality				
Mitigation Measure UT-1a: Emergency Water Storage: All subsequent development projects in the amended DTPP 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. City staff would determine the fair share contribution based on a ratio of each project's equivalent dwelling unit demand for emergency water storage compared to the total demand.	Project Applicant, City	Pay fair-share contribution	City	Prior to issuance of building permit
Mitigation Measure UT-1b: Water System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing water mains have sufficient pressure and flow for the project's demands (including but not limited to domestic and fire demands), prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any water system capacity-enhancing improvements needed to provide sufficient pressure and flow to meet the project's demands shall be funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.	Project Applicant, City	Construct capacity-enhancing improvements or pay fair-share contribution, as determined applicable by City	City	Prior to issuance of building permit
Mitigation Measure UT-1c: Sanitary Sewer System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing sewer mains have sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any sewer main(s) shown to have insufficient capacity, as a result of the project's demands, pursuant to the City's Engineering Standards shall lead to sewer system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City	Project Applicant, City	Construct capacity-enhancing improvements or pay fair-share contribution, as determined applicable by City	City	Prior to issuance of building permit

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Utilities and Infrastructure; Hydrology and Water Quality (cont'd.)				
Mitigation Measure UT-1c (cont'd.)				
adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.				
Mitigation Measure UT-1d: Stormwater System Upgrades: All subsequent development projects in the amended DTPP area, regardless of size, shall submit to the City, and obtain approval of, an evaluation and report prepared by licensed engineer demonstrating that the existing stormwater system has sufficient capacity for the project's demands, prior to the issuance of a building permit. To the extent such infrastructure is not already within a capital improvement program budget for the then-current year, any stormwater main(s) shown to have insufficient capacity, as a result of the project's demands pursuant to the City's Engineering Standards shall lead to stormwater system capacity-enhancing improvements funded and/or constructed by private developers. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.	Project Applicant, City	Construct capacity-enhancing improvements or pay fair-share contribution, as determined applicable by City	City	Prior to issuance of building permit
Mitigation Measure UT-2: Recycled Water Infrastructure: The developer of all subsequent development projects in the amended DTPP 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 design criteria of recycled water system pursuant to City of Redwood City standards. Any owner or subdivider of real property required by the City to bear the cost of constructing or installing improvements that include supplemental size, capacity, numbers or length that benefit or benefits property not owned by said owner or not within said subdivider's subdivision, may be reimbursed by subsequent development projects within the amended DTPP area, which must pay a fair-share contribution, in the manner provided for by the City's Reimbursement Agreements Ordinance or other applicable fair-share reimbursement mechanism(s). If the City adopts a development impact fee or other funding mechanism related to such infrastructure, the City may revise this mitigation measure if the fee program or mechanism is determined by the City to be equally effective substitute mitigation.	Project Applicant, City	<ol style="list-style-type: none"> 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	<ol style="list-style-type: none"> 1. During construction (installation of extension) 2. Prior to issuance of building permit (if fair-share contribution)

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Utilities and Infrastructure; Hydrology and Water Quality (cont'd.)				
<p>Mitigation Measure UT-8: Should the proposed realignment and alteration of Arroyo Ojo be undertaken, the City would require the project applicant to demonstrate that there shall be no substantial increase in off-site flooding, except in the existing or proposed street network, during a modeled 30-year or 100-year storm event, compared to pre-development conditions, as determined by the City Engineer. Potential improvements have been conceptually identified to avoid the impact, including the incorporation into the 901 El Camino Real project of sufficient detention storage on or adjacent to the project site to reduce water levels upstream and peak flows downstream of the 901 El Camino Real project site to achieve the above standard for no increase in flooding, in accordance with City Engineering Standards. The 901 El Camino Real project is expected to include development, adjacent to the site, of a new segment of Franklin Street, between Winklebleck Street and James Avenue, to replace the existing segment of California Street between Winklebleck Street and James Avenue that would be abandoned to allow for development of the 901 El Camino Real project. It is anticipated that this new segment of Franklin Street would provide at least some of the required stormwater detention storage, essentially replacing the existing detention storage provided by the segment of California Street to be abandoned. Final design of the improvement(s) to be undertaken as part of this mitigation measure shall be subject to review and approval by the City Engineer to ensure that the above standard for no substantial increase in flooding is met, in accordance with City Engineering Standards, and development of the approved improvement(s) shall become a condition of project approval for the 901 El Camino Real project.</p>	Project Applicant, City	Review and approve plans for drainage improvements to ensure no increase in off-site flooding, as specified in Mitigation Measure UT-8	City	Prior to issuance of grading or building permit
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. 	Project Applicant, City	Prepare and implement construction plan and noise abatement measures	City	<ol style="list-style-type: none"> 1. Prepare construction plan prior to issuance of building permit 2. Implement construction plan and noise abatement measures during construction

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Noise (cont'd.)				
Mitigation Measure NO-1 (cont'd.)				
<ul style="list-style-type: none"> • 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.) • 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.) 				
Mitigation Measure NO-2: Operational Noise Performance Standard: Prior to the issuance of any building permit, future project applicants within the amended DTPP 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	Project Applicant, qualified acoustical engineer, City	Prepare acoustical study during final building design	City	Prior to issuance of building permit

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Noise (cont'd.)				
Mitigation Measure NO-2 (cont'd.)				
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. Project applicants shall submit an acoustical study prepared by a qualified acoustical engineer during final building design that evaluates 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 Community Development and Transportation Department for review and approval before the issuance of any building permit.				
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: <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	1. Include vibration reduction as condition of approval for future projects 2. Implement vibration reduction measures	City	1. Prior to issuance of building permit 2. During construction
Air Quality				
Mitigation Measure AQ-2a: Best Management Practices for Construction Dust Suppression. All subsequent projects, regardless of size, shall implement best management practices to reduce construction impacts, particularly fugitive dust, to a less-than-significant level.	Project Applicant, construction contractor(s)	1. Measure is incorporated into construction specifications	City	1. Prior to construction

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2a (cont'd.)				
<p>Specifically, the project applicant 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. • 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. 		2. Construction contractor carries out construction pursuant to contract specifications		2. During construction
<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</p>	Project Applicant, construction contractor(s)	<p>1. Prepare project-level criteria air pollutant assessment of construction and operational emissions</p> <p>2. Implement emission reduction measures</p>	<p>1. City</p> <p>2. City</p>	<p>1. When the project is proposed</p> <p>2. During construction</p>

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2b (cont'd.)				
<p>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"> 1. The project applicant shall use electric construction equipment when feasible. 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>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> <ol style="list-style-type: none"> 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. 				

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-2b (cont'd.)				
Operational Emission Reductions 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. 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. 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.	Project Applicant	Implement operational emission reductions	City	Prior to issuance of building permit
Emission Offsets 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	Project Applicant	Pay mitigation offset fees if project results in criteria pollutant emissions exceeding BAAQMD thresholds with implementation of emission reduction measures	City, BAAQMD	Prior to issuance of building permit
Mitigation Measure AQ-3a: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks from Construction. Project applicants within the amended DTPP area proposing projects located, or proposed to be located within 1,000 feet of existing or approved sensitive receptor(s), as defined by the City, including those projects that would include sensitive receptor(s), shall prepare a project-level HRA of construction impacts at the time the project is proposed. This includes projects whose off-site utility improvements would occur over more than six months in duration at any given location that would be within 1,000 feet of existing or approved sensitive receptor(s). The HRA shall be based on project-specific construction schedule, equipment and activity data and shall be conducted	Project Applicant, City	Prepare project-level HRA	City	Prior to project planning approval

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Air Quality (cont'd.)				
Mitigation Measure AQ-3a (cont'd.)				
<p>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>				
<p>Mitigation Measure AQ-3b: Laboratory Emission Controls</p> <p>For any individual project that contains emissions-generating laboratory space within a "Research and Development, Laboratory" use, as defined in the Redwood City Municipal Code and located, or proposed to be located, within 1,000 feet of existing or proposed sensitive receptor(s), as defined by the City, including those projects that would include sensitive receptor(s), the project applicant shall undertake the following:</p> <ul style="list-style-type: none"> Conduct a health risk screening analysis and obtain a permit from BAAQMD for the proposed individual projects; this permit may be required either prior to or as a condition of approval of the proposed individual project. In accordance with BAAQMD Rules 2-1 and 2-5, new sources of emissions must implement Best Available Control Technology for Toxics (T-BACT) if individual source risks exceed 1.0 in a million for cancer and/or chronic hazard index is greater than 0.20. Additionally, a permit will be denied if project cancer risk exceeds 10.0 in a million or if the chronic or acute hazard index exceeds 1.0; and Obtain a conditional use permit from the City of Redwood City, subject to conditions such as the City may impose. Such conditions may include, but not necessarily be limited to, limitations on the materials and/or quantities of materials to be handled and/or stored on-site; implementation of emissions controls that, at a minimum, meet the BAAQMD T-BACT standard; siting constraints for laboratory uses and/or fume hoods; controls ensuring security of laboratory facilities and materials handled and stored therein; and limitations on the number of deliveries and/or the times when deliveries would be permitted. 	Project Applicant, BAAQMD, City	<ol style="list-style-type: none"> Prepare screening analysis and obtain BAAQMD permit If applicable, obtain CU permit 	City	<ol style="list-style-type: none"> Prior to issuance of certificate of occupancy Prior to project planning approval

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Air Quality (cont'd.)				
<p>Mitigation Measure AQ-3c: Design for Diesel Delivery Truck Emissions Minimization</p> <p>The project applicant for any subsequent development project that includes off-street loading facilities shall incorporate the following health risk reduction measures into the project design and construction contracts (as applicable) in order to reduce the potential health risk due to exposure to toxic air contaminant emissions from diesel trucks:</p> <ol style="list-style-type: none"> 1. Install electrical hook-ups for diesel trucks Transportation Refrigeration Units (TRU) at off-street loading docks. 2. Require trucks using off-street loading facilities to use Transportation Refrigeration Units (TRU) that meet Tier 4 emission standards. 3. Require truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels for trucks using off-street loading facilities. 4. Prohibit trucks using off-street loading facilities from idling for more than two minutes to the extent feasible. 5. Establish truck routes to avoid sensitive receptors to the extent feasible. A truck route program, along with truck calming, parking, and delivery restrictions, shall be implemented. 	Project Applicant, City	City to review and approve plans to verify measure 1 and include measures 2 through 5 as conditions of project approval	City	<ol style="list-style-type: none"> 1. Prior to issuance of building permit for measure 1 2. Prior to planning approval for measures 2 – 5
Climate Change				
<p>Mitigation Measure CC-1: Enforce No Natural Gas Requirement and Require Compliance with EV Requirements in CALGreen Tier 2.</p> <p>Subsequent development allowed by the DTPP Plan-Wide 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 Codes all-electric requirements.</p>	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

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Biological Resources				
Mitigation Measure BIO-1a (formerly Mitigation Measure 15-1(a) from the DTPP Final EIR). For projects in the DTPP area that adjoin Redwood Creek, the project applicant or, for any City-initiated projects, the City shall: (a) Consult with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) regarding proposed activities to determine if they could result in a "take" of a federal or State-protected species. The USFWS may presume presence or may recommend additional focused surveys to determine if any protected species are present on the site. If any special-status plant or animal species are determined to be on the property, an appropriate mitigation plan shall be developed in consultation with, and meeting the mitigation criteria of, the USFWS and the CDFW to provide for protection of such species (e.g., additional building and sidewalk setbacks from the creek top of bank, use of compatible native and noninvasive species in landscaping, changes to proposed lighting, off-site habitat replacement or enhancement).	Project Applicant, City, USFWS and CDFW (if applicable)	Applicant to provide applicable federal and/or state permits to City	City	Prior to issuance of grading or building permits
Mitigation Measure BIO-1b (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 CDFW (if applicable)	Conduct nesting bird survey if construction is during breeding season.	City	During construction
Mitigation Measure BIO-2a (formerly Mitigation Measure 15-1(b) from the DTPP Final EIR with clarifying amendments): The project applicant or the City shall comply with the Redwood City Stormwater Pollution Prevention Program, including maintenance of setbacks from Redwood Creek, erosion control methods, and measures for the avoidance of stormwater pollution. The Redwood City Engineer is responsible for making the determination as to setback limits and any permitted development within a setback.	Project Applicant, Redwood City Engineer	City to review and approve compliance with Redwood City Stormwater Pollution Prevention Program	City	Prior to issuance of grading or building permits
Mitigation Measure BIO-2b (formerly Mitigation Measure 15-2 from the DTPP Final EIR with clarifying amendments): For all projects within the amended DTPP area that involve modifications to potential wetlands, riparian zones, or regulated waters, the project applicant shall obtain all required permits and approvals from the U.S. Army Corps of Engineers (ACE), the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB). All project design modifications, habitat replacement and mitigation measures required by the ACE, CDFW and RWQCB shall be incorporated into the project prior to project approval.	Project Applicant	Applicant to provide applicable federal and/or state permits to City	City	Prior to issuance of grading or building permits

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Biological Resources (cont'd.)				
Mitigation Measure BIO-5 (formerly Mitigation Measure 15-4 from the DTPP Final EIR): Any project in the amended DTPP 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 amended DTPP 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. 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.	City, Project Applicant	<ol style="list-style-type: none"> 1. Prepare erosion control plans 2. Implement BMPs during construction 	City	<ol style="list-style-type: none"> 1. Prior to construction 2. During construction
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	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 	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

MITIGATION MEASURES	Monitoring Program			
	Implementation Responsibility	Monitoring and Reporting Action	Monitoring Responsibility	Implementation and Monitoring Schedule
Geology and Soils (cont'd.)				
Mitigation Measure GEO-4a (cont'd.)				
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.		report to be included with each building permit application		
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 amended DTPP 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. 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.	Project Applicant, City	Measure is incorporated into construction plans and specifications	City	Prior to issuance of building permit
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 amended DTPP 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-3. Implementation of this measure would reduce the potential impact on paleontological resources to a less-than-significant level.	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 	City	<ol style="list-style-type: none"> 1. Prior to issuance of grading or demolition permit 2. During construction