Draft EIR

Northeast Area Specific Plan

SCH# 2024070063



Prepared by

CITY OF SAN CARLOS
THE CITY OF GOOD LIVING
CALIFORNIA

In Consultation with

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All appendices are incorporated herein by reference.

Summary

The City of San Carlos, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Northeast Area Specific Plan (referred to herein as the "Plan") in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As the CEQA Lead Agency for this project, the City of San Carlos is required to consider the information in this EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

Summary of Project Location and Description

The Plan consists of approximately 145 acres, roughly bound by Belmont Creek, U.S. Highway 101 (U.S. 101), the western property lines of the residential parcels along Northwood Drive, the northeastern property lines of the residential parcels along Fairfield Drive, the southeast property line of the Palo Alto Medical Foundation (PAMF) and Old County Road in the City of San Carlos (City). For the purposes of this analysis, Belmont Creek will be considered north, U.S. 101 will be considered east, the residential parcels along Northwood Drive and Fairfield Drive and the southeast property line of PAMF will be considered south, and Old County Road will be considered west.

In response to the City's growth trajectory, as part of the City of San Carlos 2022 Strategic Goals[1], the City Council directed staff to prepare the Plan to manage and direct changes in the development patterns and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provision, open space, and community benefits.

The purpose of the Plan is to create a vision, policies, and standards to guide new development within the Plan area in a way that supports existing and new businesses, future residents, and the overall community. The Plan will manage and direct changes in the development patterns within the Plan area and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provisions, and community benefits.

The Plan anticipates new development and change over an approximate 20-year period, through 2045, and would allow for an increase of 1,890 residential units (no residential units exist within the

[1] City of San Carlos. "Northeast Area Development Moratorium." Accessed February 3, 2026. https://www.cityofsancarlos.org/city_hall/departments_and_divisions/community_development/planning/northeast_area_development_moratorium.php

Plan area currently), as well as an increase in the net new square footage of existing non-residential land uses within the Plan area (4,508,000 square feet).

Summary of Significant Impacts

The EIR includes a detailed discussion of the existing setting, impacts, and Plan requirements proposed to protect environmental resources and avoid and/or reduce impacts. The project description and full discussion of impacts and mitigation measures can be found in Section 2.0 Project Information and Description and Section 3.0 Environmental Setting, Impacts, and Mitigation. Table 1.1-1 summarizes the conclusions of the environmental analysis in this Draft EIR and presents a summary of significant impacts and mitigation measures identified.

Table 1.1-1: Summary of Significant Impacts and Mitigation Measures

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
Aesthetics			
No Significant Impacts			
Agriculture and Forestry Resources			
No Significant Impacts			
Air Quality			
Impact AIR-1: Buildout of the Plan would increase daily trips by 203 percent, and increase the service population by 193 percent. Since the rate of increase in population would be exceeded by the rate of increase in daily trips, the Plan would have a significant program-level criteria air pollutant emissions impact.	S	**General Plan Policies to Reduce Criteria Air Pollutant Emissions** The following General Plan goals and policies would serve to minimize potential adverse impacts related to these long-term, regional criteria air pollutant emissions: • Policy CSH-2.3: Access to public transportation facilities should be convenient and designed to encourage use of public transit. • Policy CSH-3.3: Support the incorporation of Transportation Demand Measures in new development to reduce traffic impacts. • Policy CSH-6.2: Support transit-oriented development with mixed, dense land use that reduces the need to travel and that is linked to good transit. The City shall work with local, regional and State representatives to encourage the support and funding of transit oriented development projects • Policy EM-11.4: Provide an integrated network of bicycle and pedestrian thoroughfares that connects jobs and housing to other city destinations, as recommended in the San Carlos Bicycle and Pedestrian Master Plan. • Policy EM-11.6: Encourage employers to incentivize employee use of mass transit and alternative modes of transportation. • Policy EM-11.9: Coordinate with major employers, neighboring municipalities, transit agencies and providers to enhance regional transit and shuttle service.	SU

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		• Policy EM-11.10: Evaluate and encourage new forms of mass transit. • Policy EM-11.11: Amend the Zoning Ordinance to create a Transportation Demand Management (TDM) Ordinance that contains strategies to reduce vehicle trips. • Policy EM-11.12: Include in the Transportation Demand Management Ordinance a requirement that new office development over a certain size include showers and safe and secure bike racks to encourage employees to bicycle to work.	
Impact AIR-2: Future construction under the Plan, if uncontrolled, could result in temporary dust and diesel exhaust impact to nearby receptors or exceed acceptable levels for projects. In addition, NOx emissions during grading and soil import/export for large projects may exceed the Bay Area Air District NOx emission thresholds for projects.	S	**General Plan Mitigation Measures** **Mitigation Measure AQ-2.1:** Prior to discretionary approval by the City for development projects subject to CEQA (California Environmental Quality Act) review (i.e., discretionary, nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with current BAAQMD methodology for assessing air quality impacts identified in BAAQMD's CEQA Air Quality Guidelines. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD-adopted thresholds of significance, the City shall require feasible mitigation measures to reduce air quality emissions. Measures shall require implementation of current BAAQMD Best Management Practices for construction-related fugitive dust emissions.	LTS
Impact AIR-3: Buildout of the Plan would result in annual and average daily emissions of ROG and NOx associated with operation of the Plan Area would exceed the Bay Area Air District project-level significance thresholds.	S	**General Plan Mitigation Measures** **Mitigation Measure AQ-2.2:** Prior to discretionary approval by the City for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operational air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with Air District methodology in assessing air quality impacts identified in the Air	SU

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		District's current *CEQA Air Quality Guidelines* at the time that the project is considered. If operation-related air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require the project applicant(s) to incorporate mitigation measures to reduce air pollutant emissions to comply with applicable significance threshold standards during operational activities. The identified measures shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA review. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following: o Implementing commute trip reduction programs. o Unbundling residential parking costs from property costs. o Expanding bikeway networks. o Expanding transit network coverage or hours. o Using cleaner-fueled vehicles. o Exceeding the current Title 24 Building Envelope Energy Efficiency Standards. o Establishing on-site renewable energy generation systems. o Requiring all-electric buildings. o Replacing gas-powered landscaping equipment with zero-emission alternatives. o Implementing organics diversion programs. o Expanding urban tree planting.	
Impact AIR-4: Implementation of the Plan could result in uses that would result in significant exposures of TACs and $PM_{2.5}$.	S	**Health Risk Project Requirements** • **Health Risk Assessments.** Applicants proposing development of projects within 1,000 feet of existing sensitive receptors or worker receptors as defined by the Bay Area Air District (e.g., residential, schools) shall prepare a site-specific construction and operational health risk assessment (HRA) prior to project approval. If the HRA demonstrates, to the satisfaction of the	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		City, that the health risk exposures for adjacent receptors will be less than Bay Area Air District project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed the Bay Area Air District project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.	
Biological Resources			
Impact BIO-1: Future construction activities associated with build out under the Plan could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.	S	**Special-Status Species Project Requirements** • **Avoid Nesting-Season Construction if Feasible.** To the extent feasible, demolition and construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in San Mateo County extends from February 1 through August 31, inclusive. If construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code would be avoided. • **Conduct Pre-activity Survey for Active Nests.** If it is not possible to schedule construction activities and/or tree removal between September 1 and January 31, preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of demolition or construction activities, including tree removal and pruning. During this survey, the biologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests. Prior to any tree removal, or approval of any grading or demolition permits (whichever occurs first), the ornithologist shall submit a report indicating the results of the survey and any designated buffer zones to the City's Planning Manager.	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		• **Provide a Buffer around Active Nests**. If an active nest (i.e., a nest with eggs or young) is found sufficiently close to work areas to be disturbed by these activities, the biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code shall be disturbed during project implementation.	
Impact BIO-2: Future demolition activities under the Plan could result in direct physical disturbance of any roosting bats that may be present, possibly resulting in injury or mortality, as well as the loss of roosting sites.	S	**Roosting Bat Project Requirements** • **Conduct Pre-Activity Surveys for Roosting Bats.** A pre-activity habitat assessment and survey for roosting bats shall be conducted prior to removal or renovation of buildings. The habitat assessment and survey shall be conducted by a qualified biologist. If the biologist determines that a building provides no suitable bat roost sites, no bat survey would be necessary, but if suitable roost sites exist, a visual survey shall be conducted during the daytime to determine whether bats are present. During this survey, the biologist shall look for bats and evidence of their presence (e.g., guano or urine staining). If the visual survey cannot adequately determine whether bats are present, a dusk survey shall be conducted during suitable weather conditions for bat activity to determine whether bats enter or exit the roost. If no active roosts are found, then no further action is warranted. If a roost is present, a qualified biologist shall determine the species and number of individuals present and implement further measures as described below. Prior to any tree removal, or approval of any grading or demolition permits (whichever occurs first), the biologist shall submit a report indicating the results of the survey and avoidance requirements to the City's Planning Manager. • **Avoid Disturbance of Active Roosts.** If an occupied roost is found in a structure that would be disturbed or removed by proposed activities, the project may be redesigned to avoid the disturbance of the structure. If the roost is unoccupied at the	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		time of the survey, the project proponent may have a qualified biologist install bat exclusion devices to prevent bats from taking up occupancy of the structure prior to the onset of the proposed activity. If avoidance is not feasible, the following measures shall be implemented. • **Avoid Disturbance of Maternity Roosts.** If an active maternity roost is present within the building to be demolished or disturbed and the project cannot be redesigned to avoid removal or disturbance of the occupied roost, disturbance shall not take place during the maternity season (as determined by the qualified biologist, but approximately April 1 to August 31), and an appropriate disturbance-free buffer zone (also determined by the qualified biologist) shall be observed during this period to avoid disturbing the roosting bats. Following the maternity season, bats can be excluded as described below. • **Exclude Bats Prior to Disturbance.** If disturbance of an active non-breeding roost cannot be avoided, the individuals shall be safely evicted outside the maternity season (as determined by the qualified biologist) between approximately September 1 and April 1. Exclusion methods may include the installation of one-way doors, use of ultrasonic deterrence devices, changing air flow and temperature regimes in the roost space, or other methods that would not trap bats or involve handling bats. One-way doors and/or deterrence devices should be left in place for a minimum of two weeks with a minimum of five fair-weather nights with no rainfall and temperatures no colder than 50°F.	
Impact BIO-3: Future development under the Plan would introduce new sources of artificial lighting that could impact wildlife.	S	**<u>Artificial Lighting Project Requirements</u>** • The following measures will be implemented during any renovation or redevelopment under the Plan that involves new outdoor lighting or replacement of existing lighting with fixtures or luminaires that are not identical in intensity, wavelength, and directionality to those being replaced.	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		o Through a combination of proper fixture selection, low mounting height, glare shielding, and orientation/aiming of light fixtures, the design team shall actively control undesirable spill of light toward sensitive habitat areas (i.e., Belmont Creek, other drainage channels and associated wetland and riparian habitat, or vegetated open space areas). All exterior lighting shall be fully shielded to block illumination from shining outward toward such sensitive habitat areas and to prevent the lit portions of these fixtures (i.e., the lamps) from being directed toward the sensitive habitat areas. o Outdoor lighting fixtures shall incorporate lamps with a Correlated Color Temperature of 2700 Kelvin or less. o Up-lighting shall be avoided, all fixtures shall have a backlight, uplight, and glare (BUG) up-light rating of U0, and the maximum vertical illuminance at any point in the plane of the property line will be 0.05 footcandle, unless the following conditions are met: ▪ All up-light is directed at building facades such that no light spills upwards past a structure (e.g., into the sky) or outwards into adjacent areas. ▪ The fixture is programmed to switch off between 10:00 p.m. and sunrise.	
Impact BIO-4: Future development under the Plan could result in bird collisions, causing injury or death.	S	**General Plan Policies that Reduce Impacts from Bird Collisions** In accordance with General Plan Action EM-1.5, future developments would be required to minimize the potential risk of bird collisions through the use of the latest bird-safe design guidelines and best management practices. • **Action EM-1.5:** Require that new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes. Bird safe-design measures and best management practices may include: o Avoid the use of highly reflective glass as an exterior treatment, which appears to reproduce natural habitat and can be attractive to some birds, o Limit reflectivity and prevent exterior glass from attracting birds in building plans by utilizing low-reflectivity glass and providing other non-attractive surface treatments, o Use low-reflectivity glass or other glazing treatments for the entirety of the building's glass surface, not just the lower levels, o For commercial buildings, interior light "pollution" should be reduced during evening hours through the use of a lighting control system, o Exterior lighting should be directed downward and screened to minimize illuminating the exterior of the building at night, except as needed for safety and security, o Glass skyways or walkways, freestanding glass walls, and transparent building corners should not be allowed, o Transparent glass should not be allowed at the rooflines of buildings, including in conjunction with green roofs, and o All roof mechanical equipment should be covered by low-profile angled roofing so that obstacles to bird flight are minimized.	

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		Bird Collision Project Requirements • Renovation and redevelopment under the Plan shall implement the following bird-safe building design considerations for all buildings exceeding 40 feet above ground within 300 feet of Belmont Creek or any contiguous open space areas (including other drainages and future open space areas created by the Plan) two acres or larger that are dominated by vegetation or wetland/aquatic habitats: o The extent of glass on the façades of new buildings and additions shall be minimized to the extent feasible. o No more than 10 percent of the surface area of the façades of buildings (considering all facades combines) shall have untreated glazing between the ground and 60 feet above ground. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, and/or physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Bird-safe glazing shall have the following specifications: ▪ Vertical elements of the window patterns will be at least ¼-inch wide at a maximum spacing of 4 inches, or have horizontal elements at least 1/8-inch wide at a maximum spacing of 2 inches; OR ▪ Bird-safe glazing shall have a Threat Factor less than or equal to 30. o No more than 10 percent of the surface area of any façades directly facing Belmont Creek or any open space areas two acres or larger that are dominated by vegetation or wetland/aquatic habitats, and/or façade areas within 12 vertical feet above and/or below landscaped terraces, shall have untreated glazing. o All glazing panels at corners of façades that face Belmont Creek or any open space areas two acres or larger that are dominated by vegetation or wetland/aquatic habitats, between the ground and 60 feet above ground and/or within 12 vertical feet above	

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		and/or below landscaped terraces (regardless of their height above ground), shall be 100 percent treated. o To reduce reflections of clouds and vegetation in glass and help ensure that bird-safe treatments on the lower surfaces of glass are visible below any reflections, glazing shall have a visible reflectance of 15 percent or lower. o Glass skyways or walkways, freestanding glass walls, and transparent building corners between the ground and 60 feet above ground and/or within 12 vertical feet above and/or below landscaped terraces (regardless of their height above ground) shall not be allowed, unless the glazing is 100 percent treated. o Transparent glass should not be allowed at the rooflines of buildings, including in conjunction with green roofs, unless the glazing is 100 percent treated. o A project may receive a waiver from one or more of the requirements above if a qualified biologist documents that glazing in a particular area will not increase bird collision risk or documents why alternative bird-safe design measures would be at least as effective as the above requirements. Any such waiver must be approved by the City.	
Cultural Resources			
Impact CUL-1: Future development projects under the Plan could indirectly or directly impact known and unknown historic buildings and structures by removing historic buildings and structures, or altering the setting for historic properties.	S	**<u>General Plan Policies that Reduce Impacts to Historic Resources</u>** Future development projects would comply with the following General Plan policies and actions pertaining to historic resources. • Policy LU-12.1: Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties. • Policy LU-12.2: Foster the preservation, restoration and compatible reuse of architecturally and/or historically significant structures and sites.	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		• Policy LU-12.3: Ensure that modifications to identified historic resources are consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. • Policy LU-12.4: Encourage continued use and adaptive reuse of designated historic resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction and restoration. • Policy LU-12.6: Promote the maintenance, restoration and rehabilitation of historical resources through but not limited to the use of Federal Rehabilitation Tax Credits, State incentives including the Mills Act and the California Cultural and Historical Endowment and the California State Historical Building Code. • Action LU-12.1: Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural and historical resources.	
Impact CUL-2: Future development projects under the Plan could inadvertently discover unknown archaeological resources during construction.	S	**General Plan Policies that Reduce Impacts to Archaeological Resources** • Policy LU-1.10: Require that development within the Pulgas, Brittan and Cordilleras Creek watersheds shall preserve watershed integrity, including natural vegetation, soil and slope stability, water quality, scenic values and potential archaeological resources. • Policy LU-12.1: Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.	LTS
Impact CUL-3: Future development projects under the Plan could inadvertently discover human remains during construction.	S	**General Plan Policies that Reduce Impacts to Human Remains** • Policy LU-12.5: Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
Impact GEO-1: Future development under the Plan could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction.	S	**General Plan Policies that Reduce Impacts from Liquefaction** • ESPS-1.1: The City Building Official shall verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard and appropriate mitigation measures. Based on the findings of these reports, the City shall require that new structures are designed and built to withstand the effects of seismically-induced ground failure.	LTS
Greenhouse Gas Emissions			
Impact GHG-1: Implementation of the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.	S	**General Plan Mitigation Measures** • **Mitigation Measure GHG-1:** The City of San Carlos shall prepare an update to its Climate Mitigation and Adaptation Plan (CMAP) to chart a trajectory to achieve the long-term GHG reduction goal set by AB 1279. The updated CMAP shall be completed within three years of certification of the General Plan EIR. The updated CMAP shall be updated every five years to ensure the City is monitoring the CMAP's progress toward achieving the City's GHG reduction target(s), and the City shall amend the CMAP if it is not achieving such targets. The CMAP update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CMAP update. The CMAP update shall include the following: o GHG inventories of existing and forecast year GHG levels. o Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.	SU

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		o Plan implementation guidance that includes, at minimum, the following components consistent with the CMAP update: ▪ Administration and Staffing ▪ Finance and Budgeting ▪ Timelines for Measure Implementation ▪ Community Outreach and Education ▪ Monitoring, Reporting, and Adaptive Management ▪ Tracking Tools	
Hazards and Hazardous Materials			
Impact HAZ-1: Future development within the Plan could encounter and disturb contaminated soil, soil vapor, and groundwater, and result in adverse effects on construction workers, existing residents and employees, and nearby sensitive receptors.	S	**General Plan Policies that Reduce Impacts** The following General Plan policies would reduce impacts associated with contaminated soil, soil vapor and/or groundwater from future development in the Plan: • ESPS-5.3: Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria and standards enforcement. • ESPS-5.5: Where deemed necessary, based on the history of land use, require site assessment for hazardous and toxic soil contamination prior to approving development project applications. • ESPS-5.6: Require that new development proposals are reviewed for legally required remediation by authorities with jurisdictional authority over groundwater and surface water contamination including but not limited to San Mateo County Environmental Health, State Water Quality Control Board and the Army Corps of Engineers, where waters of the United States are involved, and collaborate with authorities to ensure all relevant remediation requirements are met.	LTS
Land Use and Planning			

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
No Significant Impacts			
Mineral Resources			
No Significant Impacts			
Noise			
Impact NOI-1: Future construction associated with development under the Plan could result in temporary construction noise impacts.	S	**General Plan Polices that Reduce Impacts** In accordance with General Plan Policy NOI-1.8, future development projects under the Plan would implement the following noise control strategies and construction BMPs. • NOI-1.8: Construction activities shall comply with the City's noise ordinance. Development projects that require an acoustical study shall incorporate reasonable noise and vibration reduction measures and best management practices to minimize excessive noise levels during all phases of construction activity. Reduction measures and best management practices may include, but are not limited to, noise control techniques for construction tools and equipment, construction site management techniques, temporary noise barriers, noise monitoring and reporting, and/or construction traffic management. Such measures shall include, but not be limited to, the following to reduce construction noise levels as low as practical: • Limit construction activity to weekdays between 8:00 a.m. and 5:00 p.m. and weekends between 9:00 a.m. and 5:00 p.m., with no construction on the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Juneteenth, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day; • Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		• Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment; • Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses; • Locate staging areas and construction material areas as far away as possible from adjacent land uses; • Prohibit all unnecessary idling of internal combustion engines; • If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise levels generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced; • If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected; • If impact pile driving is proposed, foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. Pre-drilling foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of blows required to seat the pile. Notify all adjacent land uses of the construction schedule in writing; • Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.	

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		• Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.	
Impact NOI-2: Future development under the Plan could result in interior noise levels in excess of 45 dBA.	S	**General Plan Policies that Reduce Operational Noise Impacts** • NOI-1.6 and NOI-1.10: New developments within the Plan Area shall be required to comply with City noise standards set forth in the General Plan and SCMC. To ensure compliance with the operational noise level thresholds required in the General Plan and SCMC, a qualified acoustical consultant shall be retained to review mechanical equipment systems during final design of the proposed project consistent with standards City practice. The consultant shall review selected equipment and determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Additionally, enclosures and interior wall treatments shall be considered to reduce noise exposure within the on-site units. Alternate measures may include locating equipment in less noise-sensitive areas, where feasible.	LTS
Impact NOI-2: Future construction associated with development under the Plan could result in damage to existing buildings from temporary construction vibration.	S	**Vibration Control Project Requirements:** • A construction vibration control plan shall be prepared by a qualified professional in accordance with industry-accepted methodology. The plan shall identify necessary construction vibration controls to reduce the potential of cosmetic damage to buildings and to minimize annoyance. Controls may include, but would not be limited to, the following measures: o A list of all heavy construction equipment to be used for the project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams,	LTS

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
		etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds. o Place operating equipment on the construction site as far as possible from vibration-sensitive receptors. o Use smaller equipment along project boundaries to minimize vibration levels below the limits. o Avoid using vibratory rollers and tampers near sensitive areas. o Select demolition methods not involving impact tools. o Modify/design or identify alternative construction methods to reduce vibration levels below the limits. o Avoid dropping heavy objects or materials near sensitive uses. o For projects requiring impact or vibratory pile driving, develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits. Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.	

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
Impact NOI-3: Future residential uses under the Plan could potentially fall within the 55 dBA CNEL of the San Carlos Airport.	S	**General Plan Policies that Reduce Project Impacts** In accordance with General Plan Policies NOI-1.11 and NOI-1.13, future residential development within the 55 dBA CNEL would implement mitigation measures to reduce noise impacts from aircraft operations. • NOI-1.11: Ensure that proposed noise sensitive land uses include appropriate mitigation to reduce noise impacts from aircraft operations at San Carlos Airport. Work with the San Carlos Airport Pilots Association and San Mateo County to continue to refine and implement the Airport's noise abatement procedures. • NOI-1.13: Require a noise analysis for new residential uses located within the 55 CNEL impact area of the San Carlos Airport. If recommended in the report, mitigation measures shall be required as conditions of project approval.	LTS
Population and Housing			
No Significant Impacts			
Public Services			
No Significant Impacts			
Recreation			
No Significant Impacts			
Transportation			
No Significant Impacts			
Tribal Cultural Resources			
No Significant Impacts			
Utilities and Service Systems			

Significant Impact	Significance without Mitigation	General Plan Mitigation Measures and/or Policies and Specific Plan Project Requirements	Significance with Mitigation
No Significant Impacts			
Wildfire			
No Significant Impacts			

Summary of Alternatives

CEQA requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines state that an EIR must identify alternatives that would feasibly attain the most basic objectives of the project, but avoid or substantially lessen significant environmental effects, or further reduce impacts that are considered less than significant with the incorporation of mitigation. A summary of project alternatives follows. A full analysis of project alternatives is provided in Section 7.0 Alternatives Analysis.

Location Alternative

Location alternatives are frequently considered to reduce the site-specific impacts of a project. A Location Alternative would need to be at least of comparable size and have the potential to accommodate similar uses as the Plan (approximately 145 acres) in the City of San Carlos. There are no alternative locations that are of similar size to the Plan area within the City. In addition, the intent of the Plan is to manage and direct changes in the development patterns within the Plan area and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provisions, and community benefits within the specific geographic area that comprises the Plan. Therefore, it would be infeasible to evaluate an alternative location in the City. The Plan must, by its nature, guide future development located in the Plan area. Accordingly, to evaluate another location for the Plan would not be meaningful for the purposes of making a decision about the proposed project. Therefore, a location alternative is not evaluated further in this EIR.

All Employment Alternative

The All Employment Alternative would not reclassify portions of the Plan to Mixed-Use, 75-90 du/acre and would remain Planned Industrial. It is assumed that if this area remained Planned Industrial, it would be developed with up to 5,293,642 square feet of employment uses**.** None of the significant impacts of the project are directly related to the inclusion of housing in the Plan. Under this alternative, the scale of development would be similar to the Plan. Therefore, it is anticipated that this alternative would not avoid or substantially lessen any of the Plan's significant impacts. This alternative would not meet the project's fundamental objectives to introduce housing in the Plan area to accommodate future population growth in San Carlos, some of which planned housing within the Plan area is intended to satisfy some of the City's mandated housing during future RHNA cycles. Therefore, since this alternative does not meet the basic objectives of the project and would not reduce significant impacts, this alternative was not evaluated further.

GHG Reduction Alternative

This EIR does not evaluate an alternative that would reduce the Plan's significant GHG impact. Consistent with the 2045 General Plan Reset EIR, development under the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal for 2045 under AB 1279. The City has committed to implementing Mitigation Measure GHG-1,

which would ensure that the City prepares a CMAP update to chart a trajectory to achieve the long-term year 2045 GHG reduction goal and State's carbon neutrality goal set by AB 1279. It is unclear at this time if carbon neutrality can be achieved by 2045, or what form or amount of development could occur within the Plan area that would achieve carbon neutrality. Therefore, this alternative was not evaluated further.

No Project, No New Development Alternative

Under the No Project/No New Development Alternative, the Plan area would remain as it is today (i.e., 2,617,497 square feet of light industrial, office, and institutional uses). Because the No Project, No New Development Alternative would not result in changes to existing conditions, this alternative would avoid all of the significant environmental impacts of the Plan. However, under this alternative, many of the beneficial environmental resiliency standards that would be required under the Plan would not be implemented. For example, the existing setbacks to Belmont Creek would remain as they currently are, while the Plan would increase the setback from Belmont Creek for properties undergoing redevelopment adjacent to Belmont Creek to 35 feet from top of bank. Further, since no redevelopment would occur under this alternative, new publicly accessible open space would not be established. The No Project, No New Development Alternative would be environmentally superior but not meet any of the project's objectives.

No Project, Existing Plans Alternatives

The No Project, Existing Plans Alternative, assumes what would be reasonably expected to occur in the foreseeable future if the Plan were not approved, based on current plans, i.e. the existing adopted General Plan. Under this alternative, it is assumed that the Plan area would be redeveloped with up to 874,00 square feet of net new non-residential uses. This alternative would not introduce new housing within the Plan Area and, as a result, would not fulfill the Plan's objective of accommodating future population growth in the City or meeting housing needs identified through future Housing Element cycles. The No Project, Existing Plans Alternative would lessen some of the environmental impacts of the Plan. However, this alternative would not accomplish most of the Plan's objectives. Similar to the No Project, No New Development Alternative, this alternative would also not accomplish any of the Plan's environmental benefits (i.e., enhanced creek setbacks and flooding improvements).

Reduced Criteria Pollutant Emissions Alternative

The Reduced Criteria Pollutant Emissions Alternative would reduce NOx emissions by 20 percent in order to reduce emissions below the threshold of 10 tons per year. In order to achieve this level of reduction in emissions, the Plan's development would need to be reduced by an equivalent of 20 percent. Assuming that both the residential and non-residential development included in the Plan were reduced by 20 percent, this equates to a Plan that would allow up to 3,606,400 square feet of non-residential building area and 1,512 residential units. To reduce the Plan's ROG emissions below the threshold of 10 tons per year would require an approximately 80 per reduction in the amount of new development, and therefore this alternative instead focuses on the more achievable goal of avoiding the Plan's significant NOx impact. The Reduced Criteria Pollutant Emissions Alternative

would reduce the Plan's significant NOx emissions disclosed in Impact AIR-3 to less than significant, however, the Plan's ROG emissions, while reduced, would remain significant and unavoidable. All other environmental impacts under this alternative would be similar or less than the proposed Plan.

Enhanced TDM Alternative

The purpose of the Enhanced TDM Alternative is to further reduce daily trips in the Plan by an additional five percent (i.e. increasing from 25 percent to 30 percent) in order to match the rate of population growth.[2] Having the rate of VMT growth match the rate of service population growth would lead the Plan to comply with the Air District Plan-level threshold, thereby reducing the Plan's significant and unavoidable criteria air pollutant emissions impacts (Impact AIR-1). As discussed in Section 2.3.6 of this EIR, all new development in the Plan would be subject to TDM requirements that would achieve a minimum 25 percent vehicle trip reduction. Under this alternative, future development would need to achieve an additional five percent reduction of daily vehicle trips, for a total reduction of 30 percent in vehicle trips. This alternative assumes that the Plan would be redeveloped with the same amount of development as proposed by the Plan, i.e. up to 4,508,000 square feet of non-residential and up to 1,890 residential units. The Enhanced TDM Alternative would reduce Impact AIR-1 to less than significant. All other environmental impacts under this alternative would be similar to the proposed Plan. However, the feasibility of future development under the Plan being able to achieve a 30 percent trip reduction is unknown.

Issues to be Resolved

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed project, the major issues to be resolved include decisions by the City of San Carlos, as lead agency, related to:

- Whether this Draft EIR adequately describes the environmental impacts of the proposed project.
- Whether the benefits of the proposed project override environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
- Whether the identified goals, policies, or mitigation measures should be adopted or modified.
- Whether there are other mitigation measures that should be applied to the proposed project besides those goals, policies, or mitigation measures identified in the Draft EIR.
- Whether there are any alternatives to the proposed project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic objectives.

[2] Reducing the Plan's gross trips by 30 percent equates to 38,212 trips. The Plan would remove 2,282 existing trips, resulting in a net increase of 35,930 trips. With the 30 percent reduction, the alternative's rate of increase would equal 189 percent over existing, which is less than the 193 rate of increase for population growth.

Areas of Controversy

A Notice of Preparation (NOP) was circulated to local, state, and federal agencies on July 1, 2024. The 36-day comment period concluded on August 6, 2024. Environmental concerns from local residents, property owners, organizations, and/or agencies about the project related to:

- Air quality
- Climate change and sea level rise
- Land use compatibility
- Hazards and hazardous materials
- Transportation and circulation
- Water Quality

Section 1.0 Introduction and Purpose

1.1 Purpose of the Environmental Impact Report

The City of San Carlos, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Northeast Area Specific Plan (referred to as the "Plan" herein) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines 15121(a)). As the CEQA Lead Agency for this project, the City of San Carlos is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

According to the CEQA Guidelines Section 15168(a), a Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Program EIRs allow for a more exhaustive consideration of effects, cumulative impacts, and alternatives than would be practical for a series of individual project-level EIRs. A Program EIR also allows lead agencies to consider broad policy alternatives and program-wide mitigation measures to deal with basic environmental issues and cumulative effects through the use of "tiering". Tiering refers to using the analysis of general matters contained in a broader EIR in later environmental review documents prepared for projects with a narrower scope or more limited geographic scale (CEQA Guidelines, Section 15152). To use the tiering concept, the later EIR or Initial Study incorporates by reference the general discussions from the broader EIR and concentrates on the issues specific to the later project and effects that were not identified in the prior EIR. This EIR provides both program- and limited project-level environmental review for the Plan.

This EIR will allow for streamlined environmental review of subsequent development projects consistent with the Plan and analysis in this EIR. When individual projects or activities under the Plan are proposed, the City would examine the projects or activities to determine whether their effects were adequately analyzed in this EIR, as provided under CEQA Guidelines Sections 15168(c), 15168(d), 15182, and/or 15183.

CEQA Guidelines Section 15168(c) states that later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. CEQA Guidelines Section 15168(d) stipulates that a program EIR can be used to simplify the task of preparing environmental documents on later activities in the program, and that the program EIR can (1) provide the basis in an Initial Study for determining whether the later activity may have significant effects; (2) be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole; and (3) focus an EIR on a later activity to permit discussion solely of new effects which had not been considered before. CEQA Guidelines Section 15182 describes the terms for CEQA exemption eligibility for residential, commercial, and mixed-use projects consistent with a Specific Plan.

CEQA Guidelines Section 15183 stipulates that projects consistent with the development density established by existing zoning, community plan (such as the proposed Plan), or General Plan policies for which an EIR was certified shall not require additional review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

If subsequent projects within the Northeast Area, consistent with the Plan, are found to be within the scope of this EIR, additional environmental documents may not be required. If a subsequent activity would have effects that were not identified in this EIR, the City would require preparation of additional environmental review as applicable.

1.2 EIR Process

1.2.1 Notice of Preparation and Scoping

In accordance with Section 15082 of the CEQA Guidelines, the City of San Carlos prepared a Notice of Preparation (NOP) for this EIR. The NOP was circulated to local, state, and federal agencies on July 1, 2024. The 36-day comment period concluded on August 6, 2024. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. The City of San Carlos also held a public scoping meeting on August 5, 2024 to discuss the project and solicit public input as to the scope and contents of this EIR. The meeting was held at the Planning and Transportation Commission regular meeting location in the City Hall Council Chambers, 600 Elm Street. Appendix A of this EIR includes the NOP and comments received on the NOP.

1.2.2 Draft EIR Public Review and Comment Period

Publication of this Draft EIR will mark the beginning of a 45-day public review period. During this period, the Draft EIR will be available to the public and local, state, and federal agencies for review and comment. Notice of the availability and completion of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP, as well as the Office of

Planning and Research. Written comments concerning the environmental review contained in this Draft EIR during the 45-day public review period should be sent to:

City of San Carlos Planning Division
Attention: Rendell Bustos, Senior Planner
600 Elm Street, San Carlos California 94070-3085
AdvancePlanning@cityofsancarlos.org

1.3 Final EIR/Responses to Comments

Following the conclusion of the 45-day public review period, the City of San Carlos will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR text, as necessary;
- List of individuals and agencies commenting on the Draft EIR;
- Responses to comments received on the Draft EIR, in accordance with CEQA Guidelines (Section 15088);
- Copies of letters received on the Draft EIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. This Statement of Overriding Considerations must be included in the record of project approval.

1.3.1 Notice of Determination

If the project is approved, the City will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office and available for public inspection for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

Section 2.0 Project Information and Description

2.1 Project Location

The Plan consists of approximately 145 acres, roughly bound by Belmont Creek, U.S. Highway 101 (U.S. 101), the western property lines of the residential parcels along Northwood Drive, the northeastern property lines of the residential parcels along Fairfield Drive, the southeast property line of the Palo Alto Medical Foundation (PAMF) and Old County Road in the City of San Carlos (City). For the purposes of this analysis, Belmont Creek will be considered north, U.S. 101 will be considered east, the residential parcels along Northwood Drive and Fairfield Drive and the southeast property line of PAMF will be considered south, and Old County Road will be considered west. Please refer to Figure 2.1-1, Figure 2.1-2, and Figure 2.1-3 for maps showing the project location and surrounding context.

2.2 Project Background

Since 2015, the City has experienced an unprecedented level of private sector investment, including business and employment growth in the life sciences and biotechnology sectors in East San Carlos. Historically, East San Carlos has been home to low-intensity commercial and industrial businesses and is currently seeing an increased interest in Research and Development uses. To plan for these changes, the City approved the East Side Innovation District Vision Plan in October 2021. The East Side Innovation District Vision Plan covers a portion of east San Carlos as the area bound by Holly Street, Brittan Avenue, Old County Road, and Highway 101. The plan established strategies for managing and harnessing growth in the area.

Since approval of the East Side Innovation District Vision Plan in 2021, developer interest has expanded further north and east of Old County Road, referred to as the Northeast Area. A portion of the area covered under the proposed Plan was annexed into the City in 1997, and since that time there have been very few changes to the land use regulations in the area.

In response to the City's growth trajectory, as part of the City of San Carlos 2022 Strategic Goals, the City Council directed staff to prepare the Plan to manage and direct changes in the development patterns and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provision, open space, and community benefits.

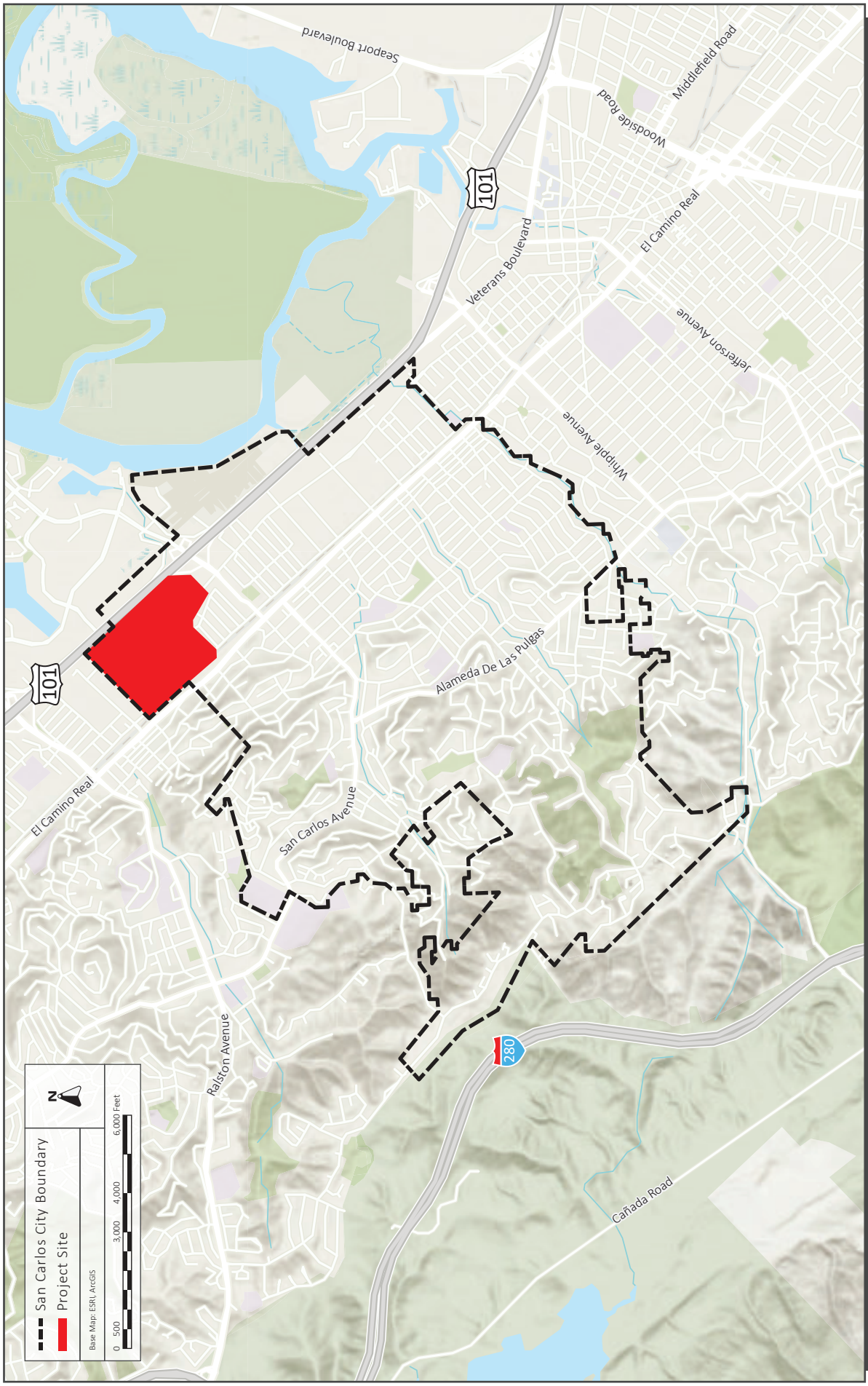


FIGURE 2.1-1

REGIONAL MAP

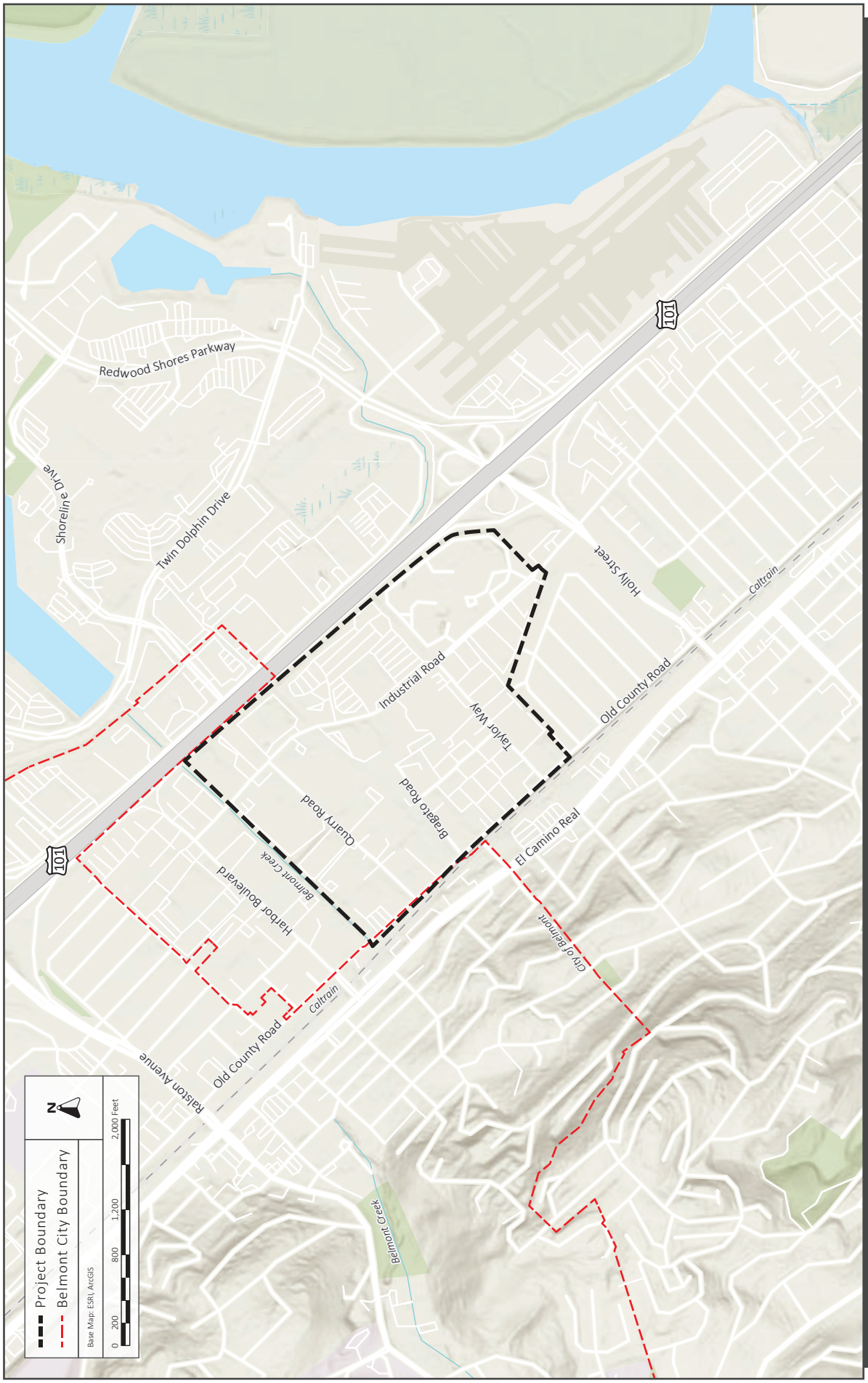


FIGURE 2.1-2

VICINITY MAP



FIGURE 2.1-3

AERIAL PHOTOGRAPH OF THE PROJECT SITE

2.2.1 Existing Land Use and Zoning

The entire Plan area has a current General Plan land use designation of Planned Industrial. This Planned Industrial land use designation allows research and development, biotechnology (biotech), light industrial, flex space[3], warehousing, and related uses.[4]

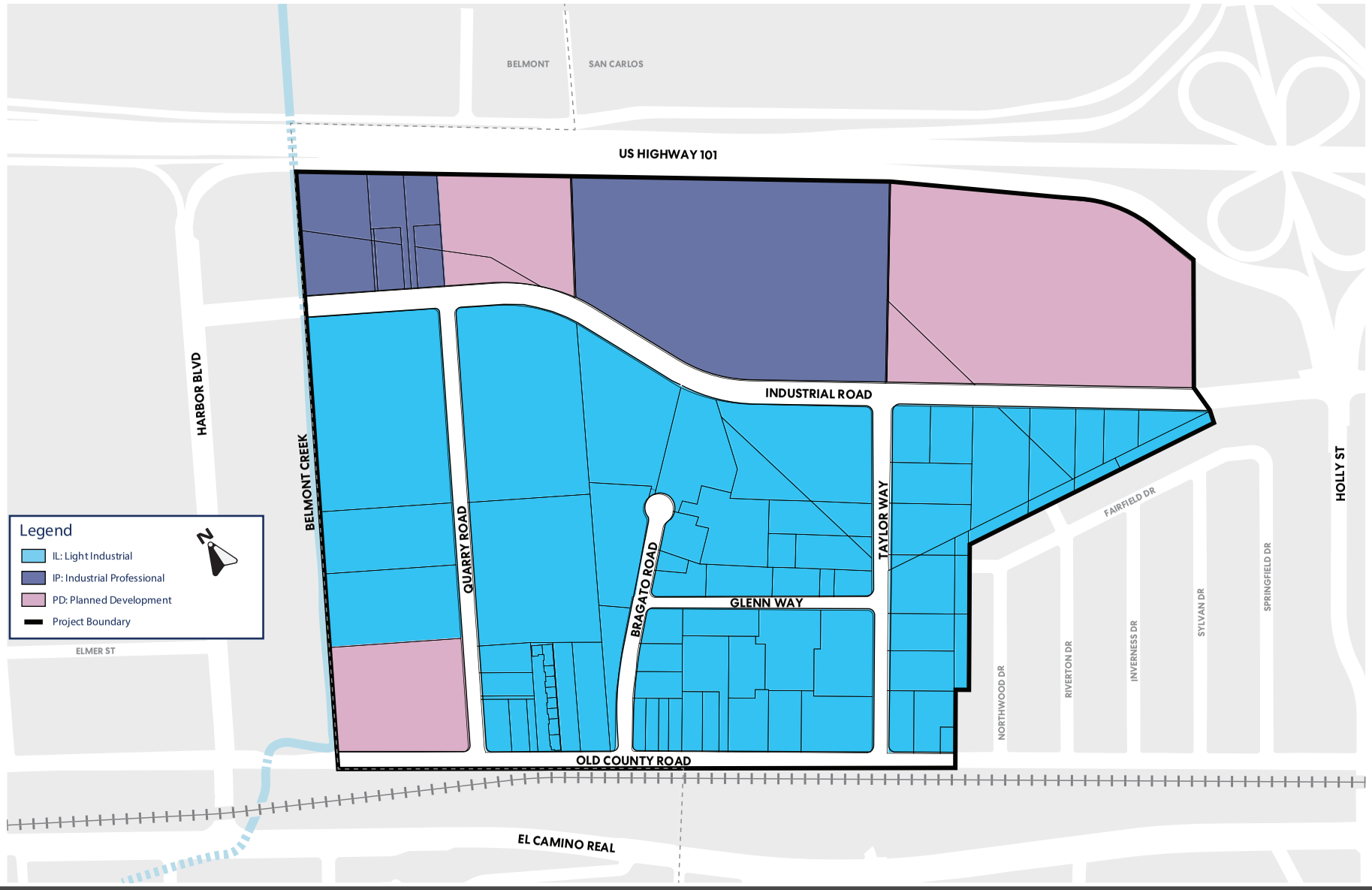
Parcels in the Plan area are currently regulated under a range of zoning districts, as summarized in Table 2.2-1 and shown in Figure 2.2-1 below.

Table 2.2-1: Existing Zoning Districts in the Plan Area (San Carlos Municipal Code [SCMC] 18.07.010, E, G; 18.10.010)

Zoning District	Description
IL: Light Industrial	The IL: Light Industrial district is intended to accommodate a diverse range of light industrial uses, including general services, research and development, biotechnology, warehousing, and service commercial uses. It includes industrial complexes, flex space, and industrial buildings for single and multiple users, warehouses, wholesale, commercial recreation, and other related uses. Small-scale retail and ancillary office uses are also permitted.
IP: Industrial Professional	The IP: Industrial Professional district is intended for large or campus-like office and technology development that includes office, research and development, manufacturing, and other large-scale professional uses. Permitted uses include incubator research facilities, prototype manufacturing, testing, repairing, packaging, and printing as well as offices and research facilities. Accessory or secondary small-scale retail uses that serve local employees and visitors are also permitted.
PD: Planned Development	The PD: Planned Development district provides for one or more properties to be developed under a plan that provides for better coordinated development and incorporates development standards crafted to respond to site conditions.

[3] "Flex space" means floor area constructed so that it can be adapted for retail/restaurant use in the future, but may be used for other uses in the interim.

[4] A figure showing existing General Plan land use designations is not provided since the entire Plan area is within the Planned Industrial designation.



EXISTING ZONING MAP

FIGURE 2.2-1

2.3 2045 General Plan Reset

On May 27, 2025, the City Council certified the 2045 General Plan Reset Final EIR and adopted the 2045 General Plan Reset. The Final EIR considered buildout projections that included the anticipated growth in the Plan, but did not adopt land use changes in the Plan.

2.4 Project Description

The purpose of the Plan is to create a vision, policies, and standards to guide new development within the Plan area in a way that supports existing and new businesses, future residents, and the overall community. The Plan will manage and direct changes in the development patterns within the Plan area and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provisions, and community benefits.

The Plan anticipates new development and change over an approximate 20-year period, through 2045, and would allow for an increase of 1,890 residential units (no residential units exist within the Plan area currently), as well as an increase in the net new square footage of existing non-residential land uses within the Plan area, as summarized in Table 2.4-1 below.

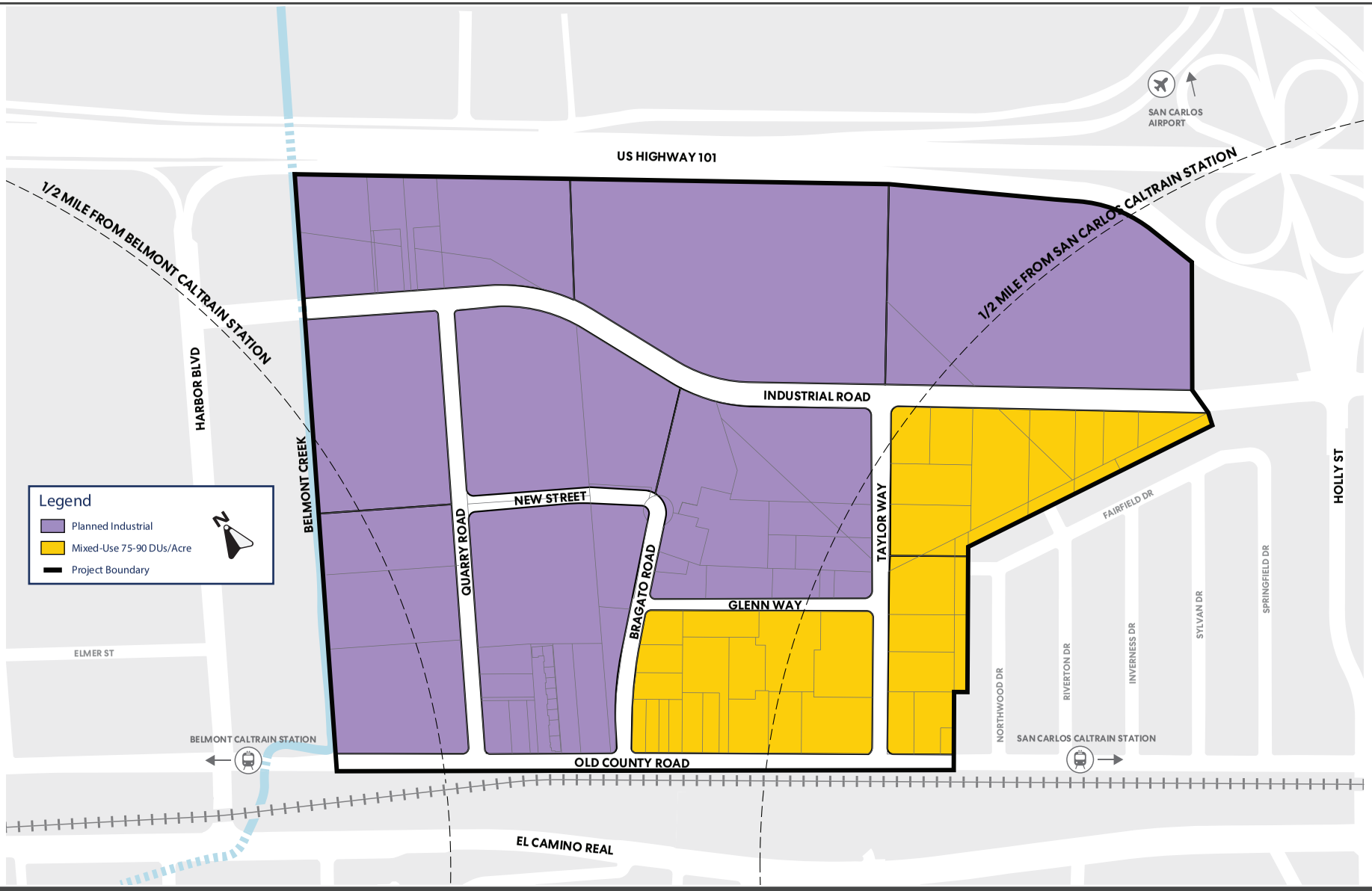
Table 2.4-1: Plan Development Projections

Land Use	Allowable Square Footage Net Increase
Non-Residential	4,508,000
Residential	1,890,000 (1,890 units, assuming 1,000 sq.ft./unit)
Net Increase Total	**6,398,000**

2.4.1 Proposed Land Use and Zoning Districts

2.4.1.1 *Proposed Land Use Designations*

The Plan would remain largely Planned Industrial. As shown on Figure 2.4-1, portions of the Plan (approximately 28 acres) would be reclassified to Mixed-Use, 75-90 du/acre. The Mixed-Use, 75-90 du/acre permits both commercial and multi-family residential uses at residential densities of 75-90 dwellings units per acre.



PROPOSED GENERAL PLAN LAND USE DESIGNATIONS | FIGURE 2.4-1

2.4.1.2 *Proposed Zoning Districts*

The Plan's zoning districts are listed in Table 2.4-2 and shown on Figure 2.4-2. Figure 2.4-3 depicts the allowable building height for each land use classification and Figure 2.4-4 depicts the potential allowable bonus density (for residential), floor area ratio[5] (FAR) (for commercial/industrial) and height for each zoning district.

Table 2.4-2: Proposed Zoning District Standards

Land Use Classification	Base FAR	Bonus FAR	Base Height (ft)	Bonus Height (ft)[1,2,3]	Density (du/ac)	Corresponding Zoning Districts
Planned Industrial	1.5 to 2.0	No FAR cap	75 to 100	155	--	Production and Innovation
	1.0	--	100	--	--	Industrial Professional
Mixed-Use, 75-90 du/acre	--	--	90	--	90	Mixed-Use Northeast (MU-NE-90)
	--	--	75	--	75	Mixed-Use Northeast (MU-NE-75)

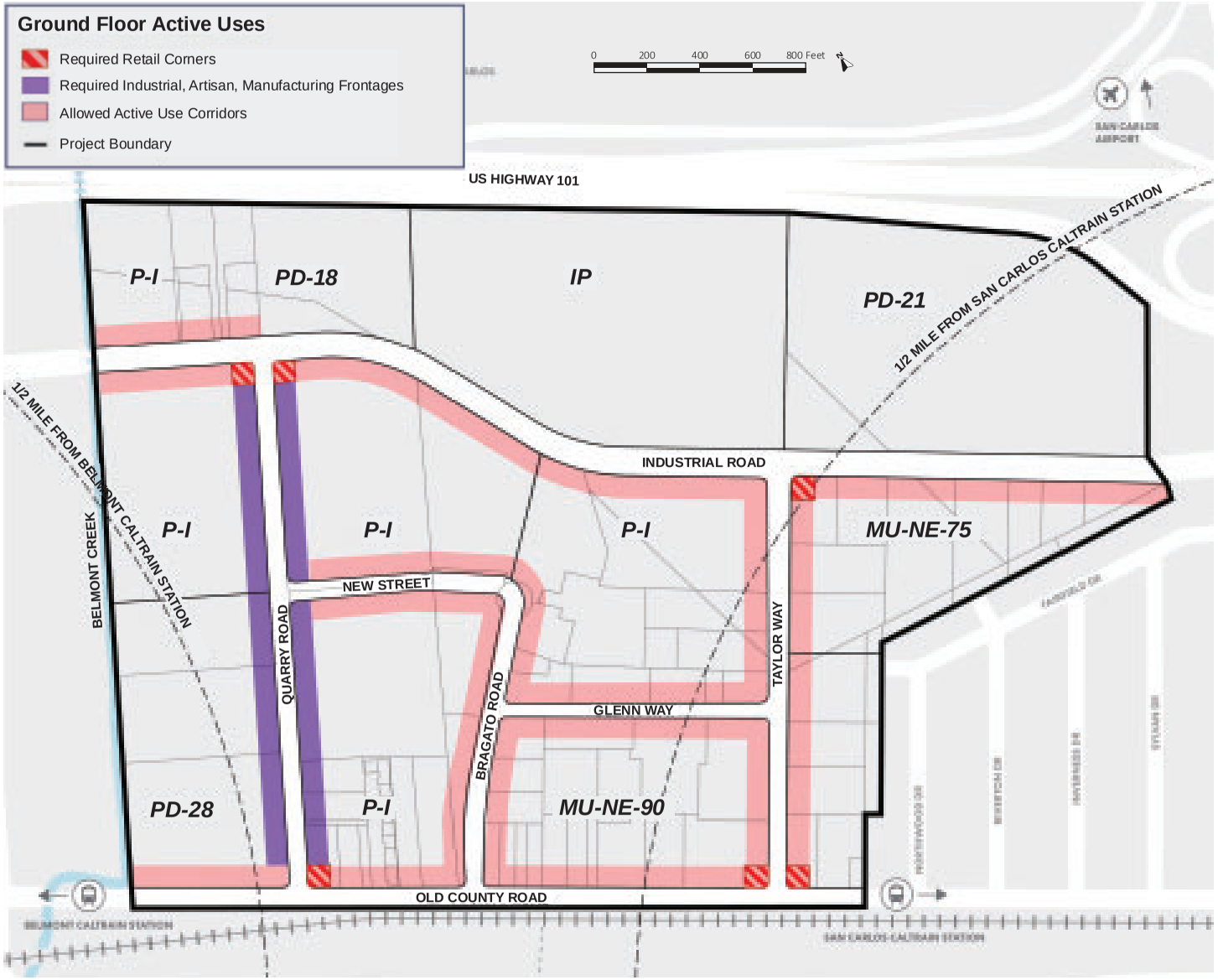
Notes:

[1] The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport (ALUCP) dictates the maximum height permitted within the Plan to protect navigable airspace around the airport.

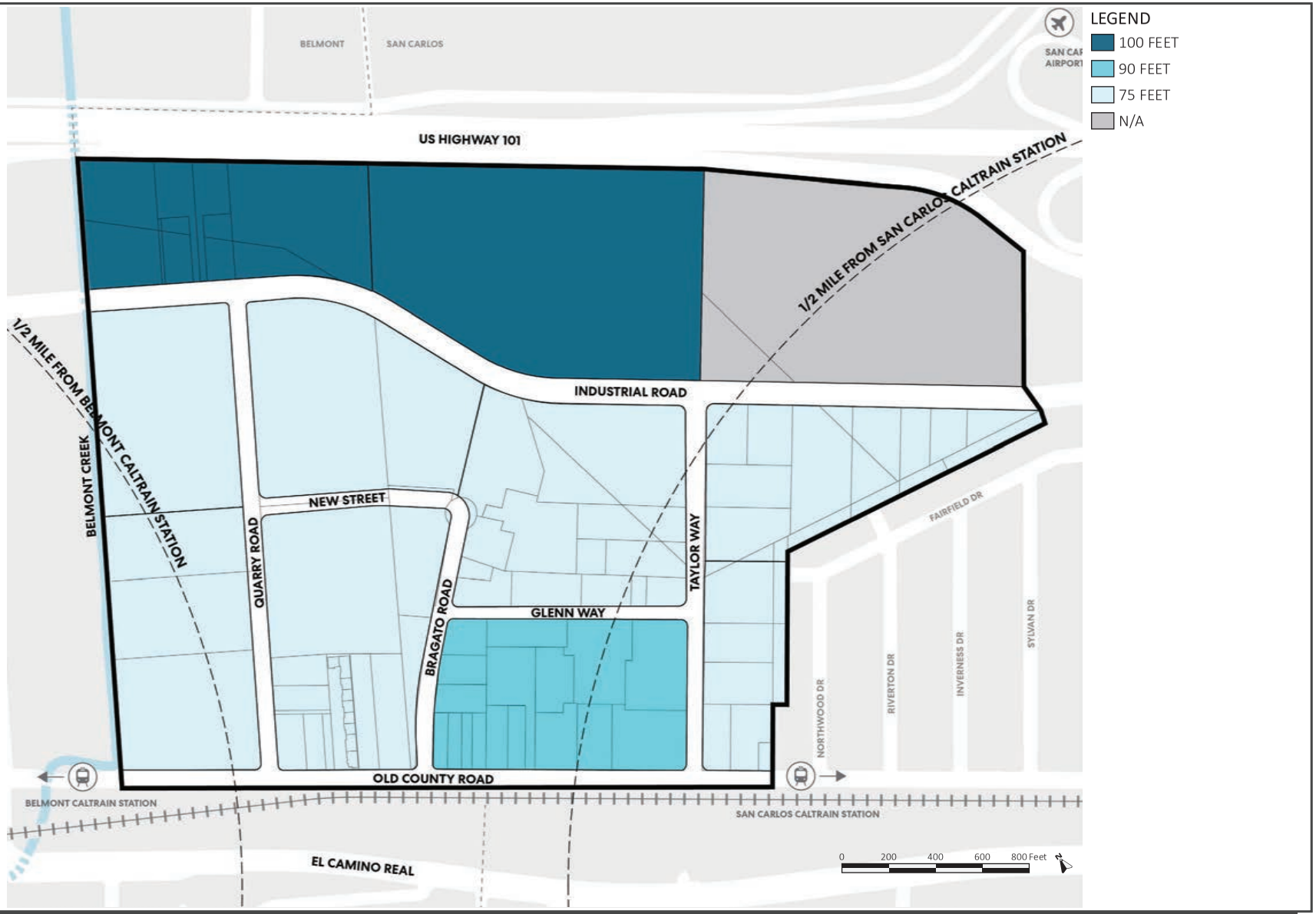
[2] Bonus FAR and building height maximums are measured from above mean sea level.

[3] All buildings within 130 feet of a single-family residential property shall stepdown to a maximum height of 35 feet.

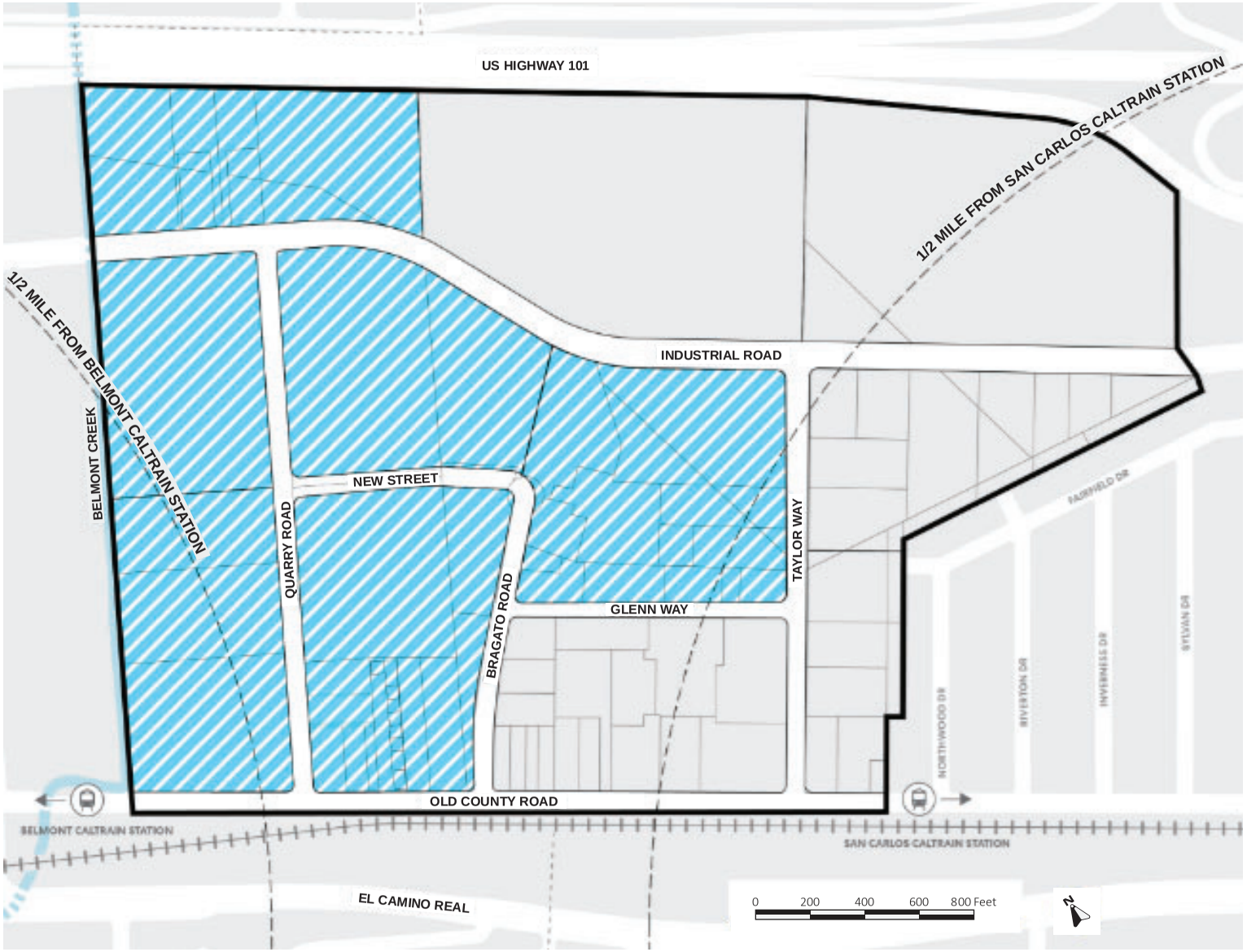
[5] FAR is a measurement used to describe the density of development on a site. FAR is calculated by dividing the total usable floor area of a building by the total lot size.



PROPOSED ZONING DISTRICT MAP | FIGURE 2.4-2



ALLOWABLE BASE BUILDING HEIGHT MAP | FIGURE 2.4-3



BONUS FAR AND HEIGHT MAP

FIGURE 2.4-4

Production and Innovation

The Production and Innovation district is intended to accommodate a mix of light industrial uses, warehouses, commercial recreation, office and research and development uses. Smaller scale retail, artisanal manufacturing, and food and beverage uses are also permitted and encouraged on the ground floor to support pedestrian activation.

The Production and Innovation district would allow buildings to have a FAR ranging from 1.0 to 2.0, depending on the location of the proposed development. Depending on location within the classification, projects would have the potential to receive a bonus FAR through the community benefits program[6] (refer Figure 2.4-4). As shown in Figure 2.4-2, the district would allow buildings to have a height ranging from 75 to 100 feet from finished grade depending on the location of development.[7,8] Projects within this district would have the potential to receive a maximum height allowance of 155 feet above mean sea level, depending on location, if bonus requirements are met, and found to be in compliance with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport (refer to Figure 2.4-4).

Mixed-Use Residential Northeast

The Mixed-Use Residential Northeast district is intended for medium to high density multi-family residential uses with active ground floor uses such as retail, personal services, and food and beverage uses, providing a transition from Production and Innovation to Single Family Residential zoning districts that lie to the southeast, and outside of the Plan area. The Mixed-Use Residential Northeast district would allow 75 to 90 dwelling units per acre.

As shown in Figure 2.4-2, the Mixed-Use Residential Northeast district would allow buildings to have a height ranging from 75 to 90 feet, depending on the location of the development. Additionally, all buildings within 130 feet of the rear lot line of a single-family residential property would be required to stepdown to 35 feet.

Industrial Professional

The Industrial Professional district is intended for large or campus-like office and technology development that includes office, research and development, manufacturing, and other large-scale, professional uses. The classification would allow for a maximum FAR of 1.0 and a maximum height of 100 feet as summarized in Table 2.4-2 and shown in Figure 2.4-4, respectively.

[6] Bonus FAR and building heights apply to certain areas in the Plan where development can earn an FAR or Building Height bonus in exchange for community benefits.
[7] The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport (ALUCP) dictates the maximum height permitted within the Plan to protect navigable airspace around the airport. The ALUCP utilizes above mean sea level (AMSL) for purposes of measuring height limits.
[8] Elevations in the Plan area range from 13 to 50 feet above sea level.

Planned Development

The Plan would maintain the previously approved Planned Development (PD) Plans (adopted by Ordinance as PD-18, PD-21 and PD-28), which accommodate the existing private (PAMF) institution, 642 Quarry Road, and 201 Industrial Road sites.

Non-Conforming Uses

Conforming uses existing prior to the adoption of the proposed Plan may continue in accordance with Chapter 18.19 of the San Carlos Municipal Code, as amended by the project.[9]

2.4.2 General Plan Text Amendments

To ensure consistency between the City's General Plan and the proposed Plan, the project includes text amendments to policies in the General Plan Land Use Element, Circulation and Scenic Highways Element, Environmental Management Element, and Environmental Safety and Public Services Element.

2.4.3 Circulation Improvements

The Plan would create and enhance well-defined connections (including a new road extension, pedestrian and multi-purpose paths, protected bicycle lanes, and connectivity to adjacent neighborhoods and districts) to transit, pedestrian, and bicycle facilities.

2.4.3.1 *Roadway Improvements*

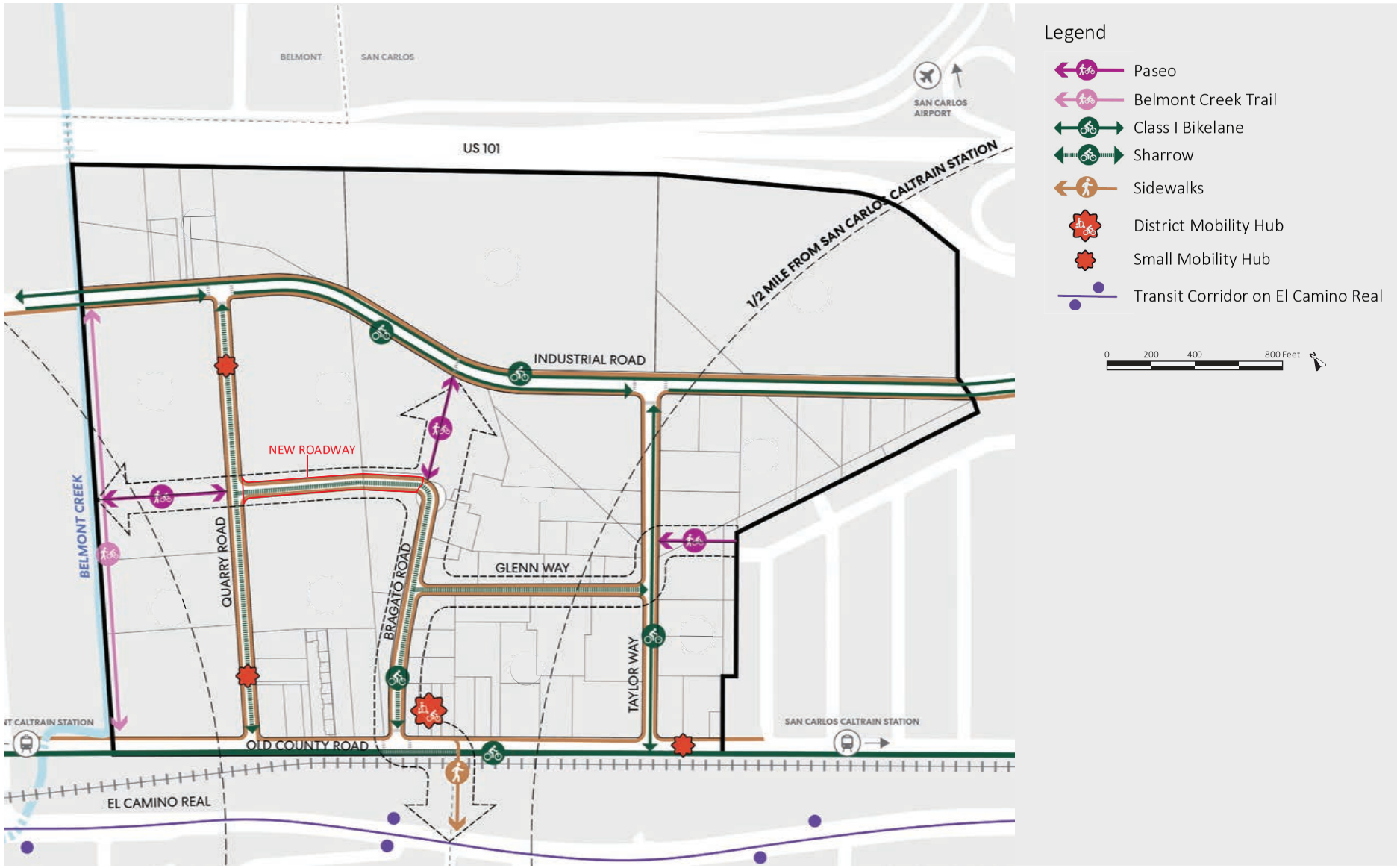
Streets within the Plan would be designed to create opportunities for a variety of travel options, including sidewalks and designated bicycle facilities. The proposed street network is shown on Figure 2.4-5 and summarized in Table 2.4-3 Roadway sections are provided in Figures 2.4-6 through 2.4-12.

Table 2.4-3: Proposed Street Network

Street	Vehicle Lanes	Street Parking	Multi-Use Curb Zone[1]	Pedestrian Path	Bike Lanes
Bragato Road	Two-way, 10-feet wide lanes	Accommodated on both sides of the street	11-feet wide on both sides of street	9-feet wide sidewalks with 10-feet wide setbacks between buildings/sidewalk on both sides of street	Class III (10-feet wide shared lane)

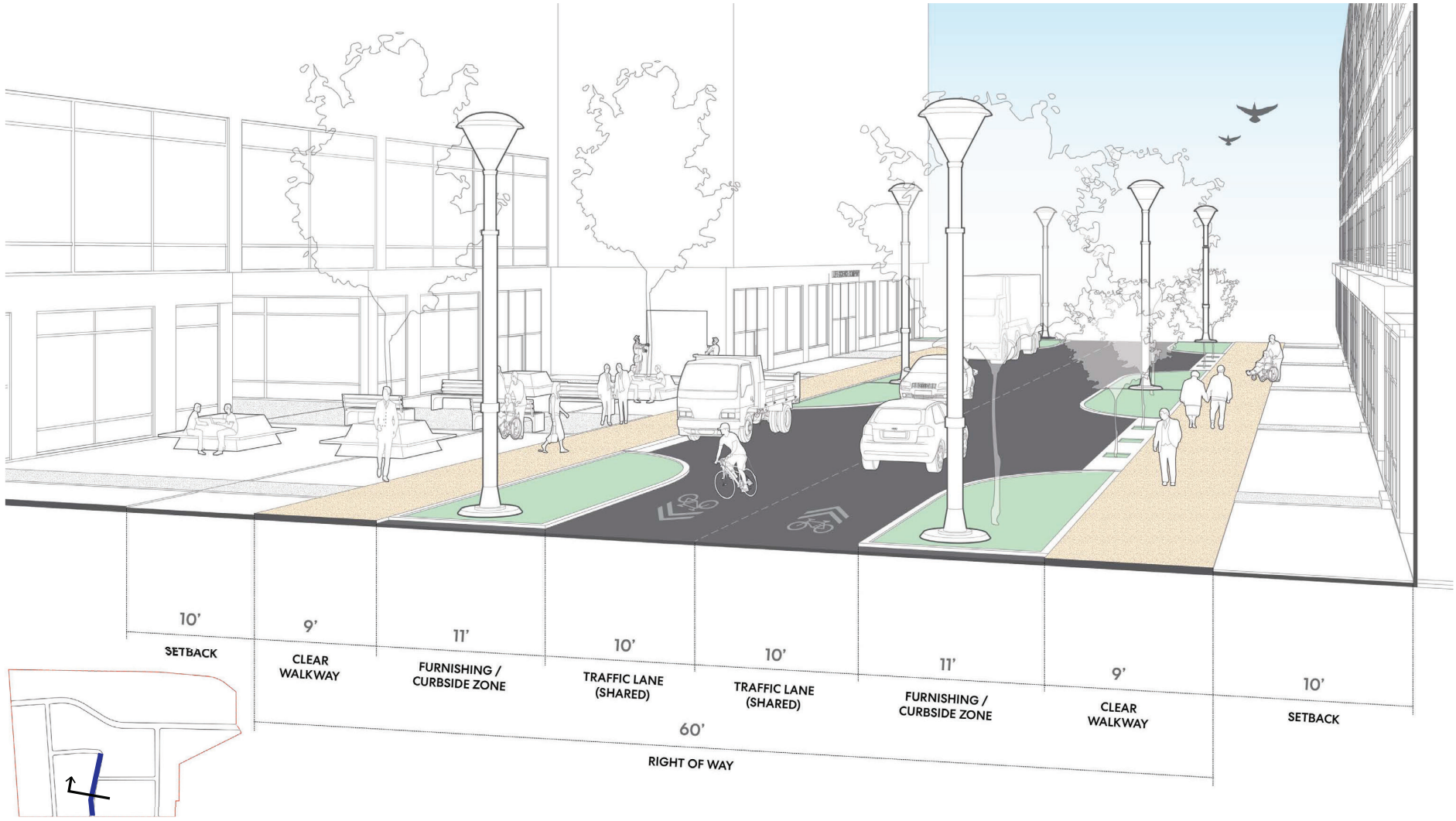
[9] The project includes Zoning Ordinance amendments that would increase the length of time in which a nonconforming use can be replaced with nonconforming use before it must be replaced with a permitted use. In addition, the amendments would require a minor use permit, instead of a conditional use permit, to re-establish a prior nonconforming use.

Street	Vehicle Lanes	Street Parking	Multi-Use Curb Zone[1]	Pedestrian Path	Bike Lanes
Glenn Way	Two-way, 10-feet wide lanes	Accommodated on both sides of the street	8-feet wide on east side of street and 9-feet wide on west side of street	8-feet on both sides of street.	Class III (10-feet wide shared lane)
Industrial Road	Two-way, 10-feet wide lanes 10-feet wide center turning lane	Accommodated on both sides of the street	11-feet wide on both sides of street	9-feet wide on east side of street and 8-feet wide on west side of street	Class I (5-feet wide protected lanes on both sides of street)
New North-South Street	Two-way, 10-feet wide lanes	Accommodated on both sides of the street	11-feet wide on both sides of street	9-feet wide on both sides of street	Class III (10-feet wide shared lane)
Old County Road	Two-way, 10-feet wide northbound and 12-feet wide southbound	None	5-feet wide on east side of street	8-feet wide sidewalk on the east side of the street with 10-foot setback between buildings/sidewalk	Class I (12-feet two way protected lane)
Quarry Road	Two-way, 10-feet wide lanes	Accommodated on both sides of the street	11-feet wide on both sides of street	9-feet wide on both sides of street	Class III (10-feet wide shared lane)
Taylor Way	Two-way, 10-feet wide lanes	Accommodated on one side of the street	10-feet wide on south side of street	8-feet wide on both sides of the street	Class I (10-feet wide two-way protected lane)



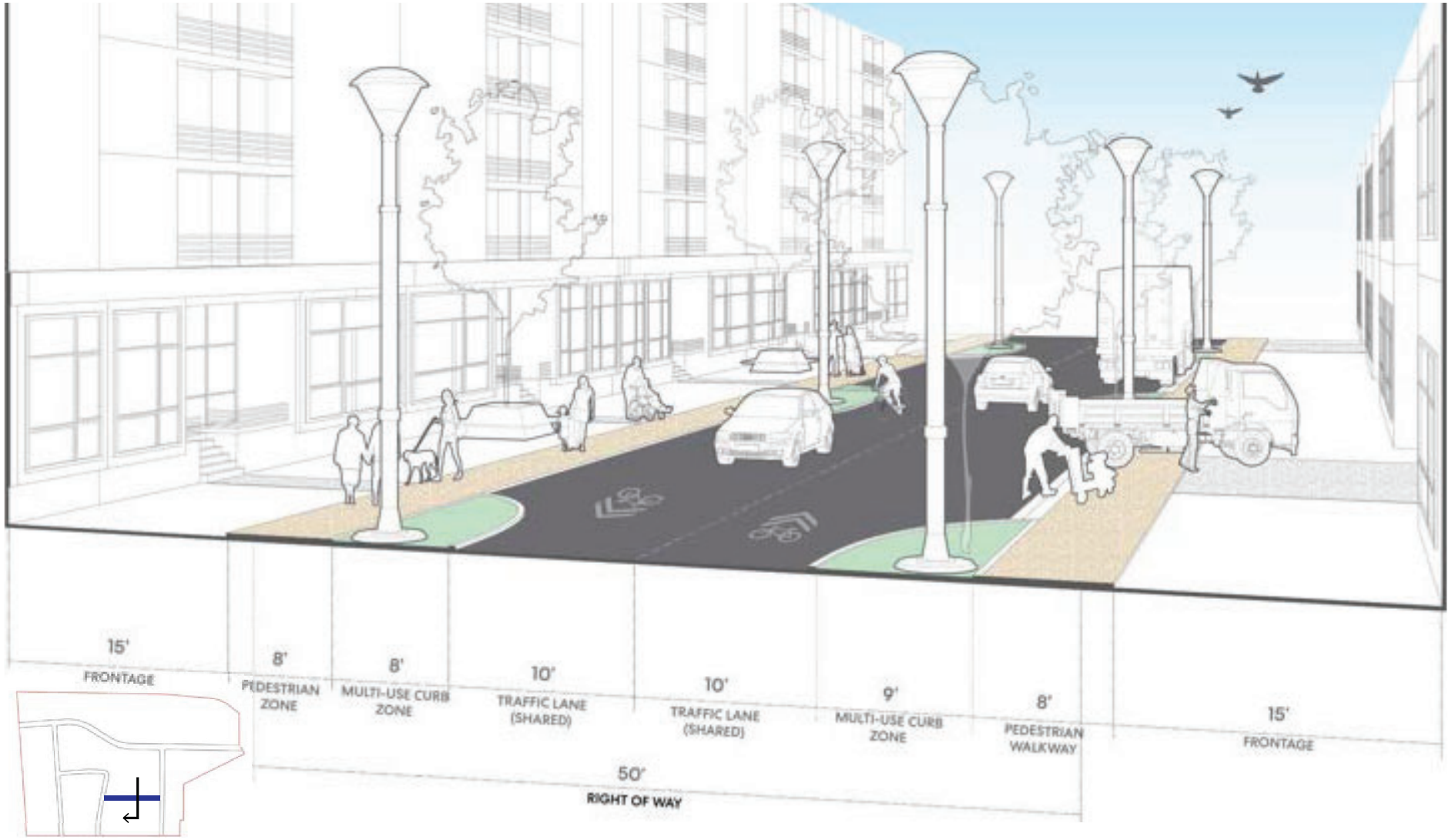
PROPOSED TRANSPORTATION NETWORK

FIGURE 2.4-5



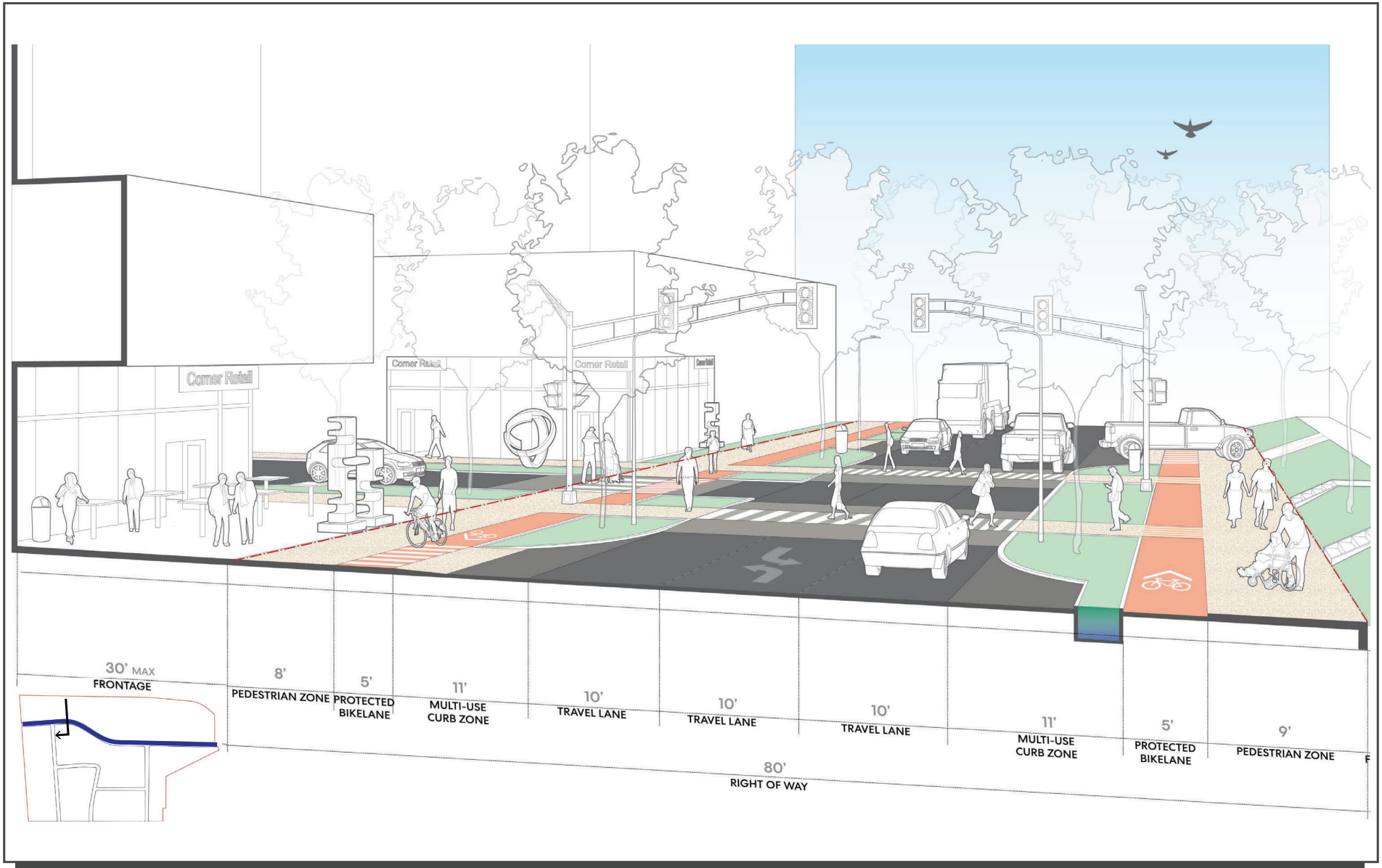
BRAGATO ROAD SECTION

FIGURE 2.4-6



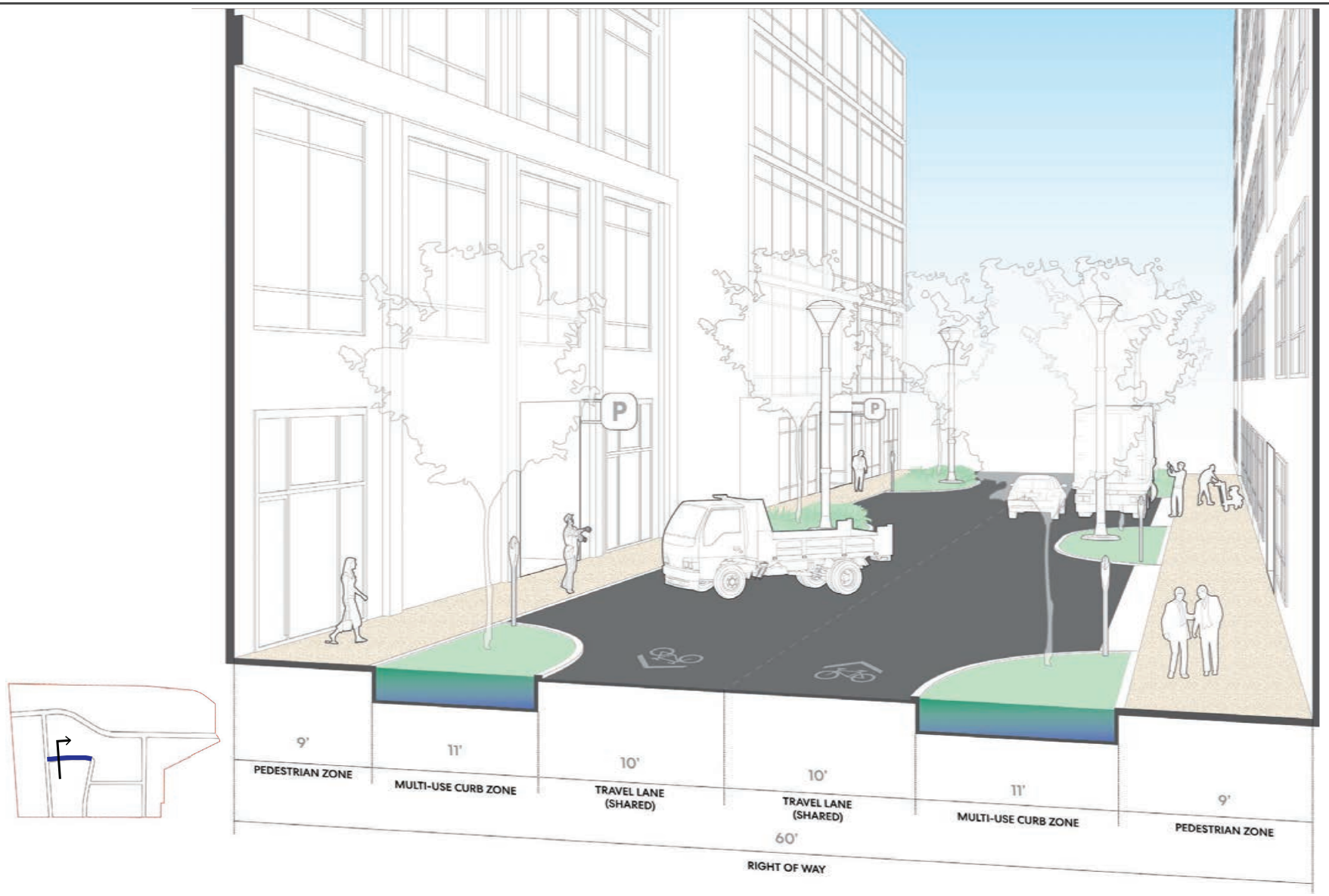
GLENN WAY SECTION

FIGURE 2.4-7



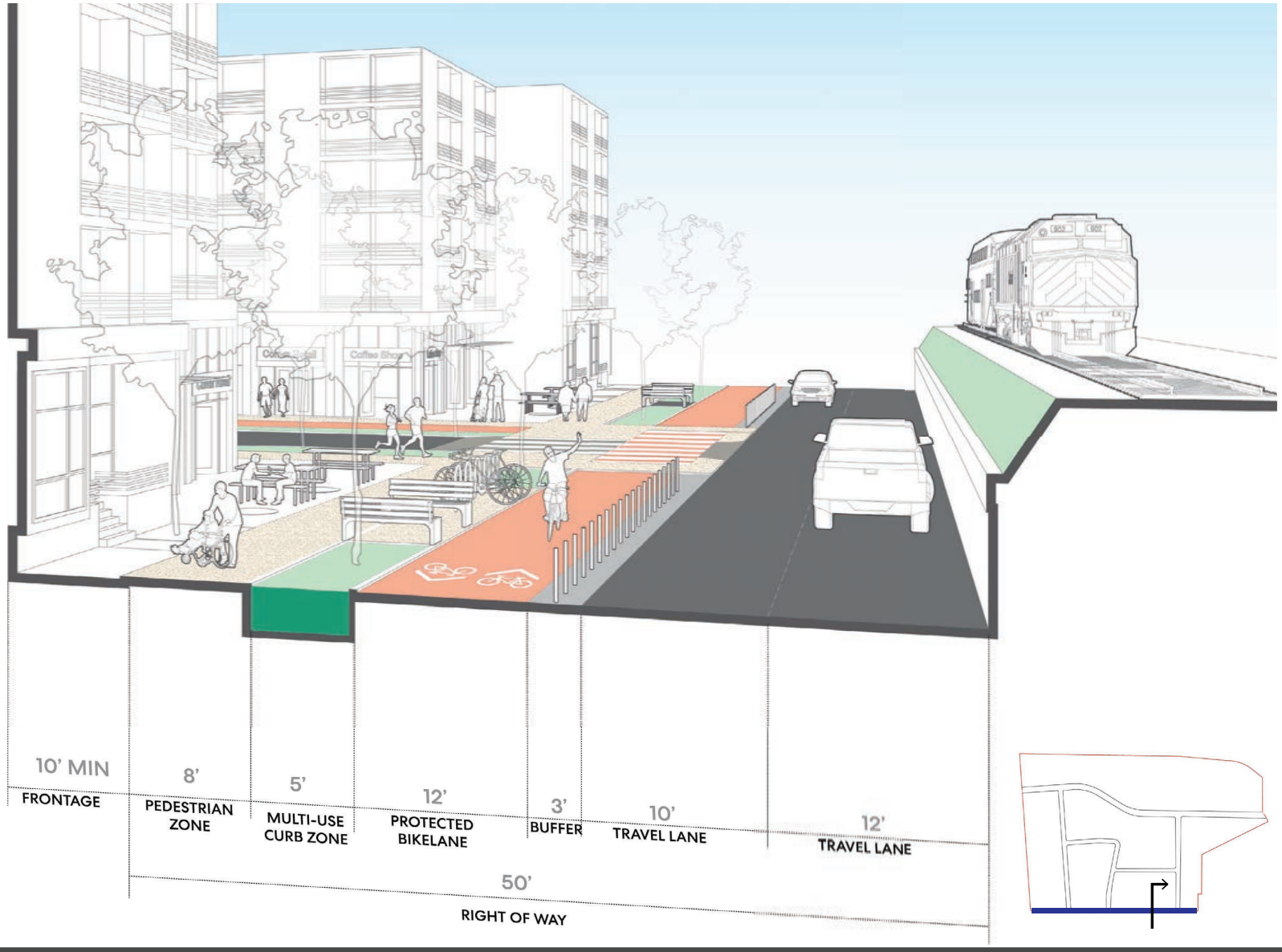
INDUSTRIAL ROAD SECTION

FIGURE 2.4-8



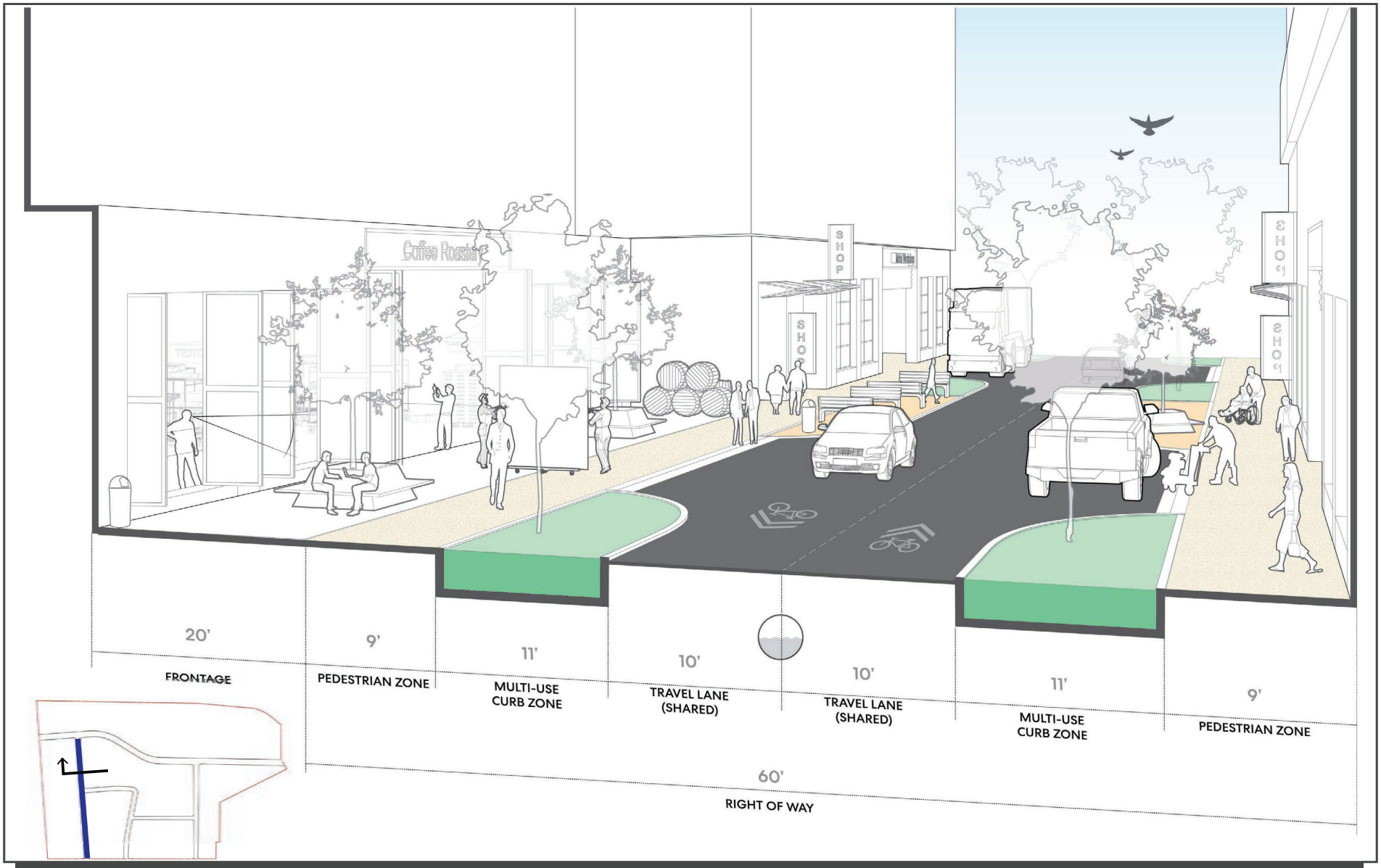
NEW NORTH-SOUTH STREET SECTION

FIGURE 2.4-9



OLD COUNTY ROAD SECTION

FIGURE 2.4-10



QUARRY ROAD SECTION

FIGURE 2.4-11



TAYLOR WAY SECTION

FIGURE 2.4-12

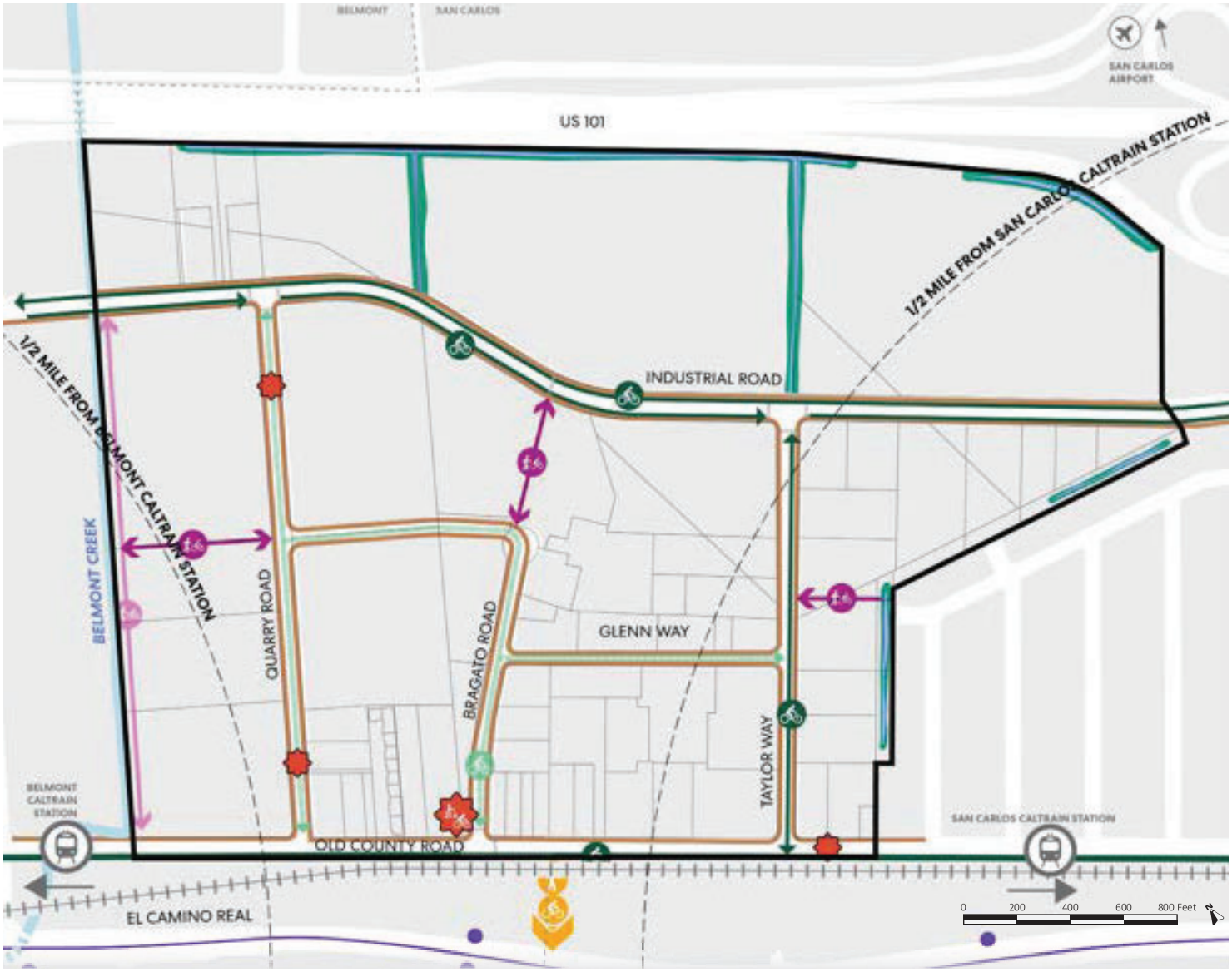
The Plan would implement the following roadway improvements:

- Implementation of a new north-south street segment connecting Quarry Road to Bragato Road
- Signalization of the Industrial Road and Taylor Way intersection
- Installation of traffic calming measures (i.e., speed tables, curb extensions, reduced lane widths, physical buffers, high visibility markings, and wayfinding) at the following intersections:
    - Quarry Road and new North-South Street
    - Bragato Road and Glenn Way
    - Taylor Way and Glenn Way
- Installation of rectangular rapid flash beacons (RRFB) at the following intersections:
    - Quarry Road and Old County Road
    - Industrial Road and Bragato Road
    - Old County Road and Taylor Road
- Restricted parking (as shown on Figure 2.4-5)

2.4.3.2 *Pedestrian and Bicycle Improvements*

As summarized above in Table 2.4-3 and shown in Figure 2.4-13, the Plan would include pedestrian and bicycle improvements to create opportunities for a variety of travel options. Industrial Road, Old County Road, and Taylor Way would have two-way protected bike lanes.

The Plan includes three pedestrian paseos, one along the new north-south street connecting Bragato Road to Industrial Road, one connecting the proposed Belmont Creek to Quarry Road, and one connecting Taylor Way to the Greater East Side Neighborhood to facilitate more connectivity and accessibility in the district. A proposed 10-foot-wide trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features. It is anticipated that future development along Belmont Creek will implement the trail.



PROPOSED BICYCLE AND PEDESTRIAN NETWORK | FIGURE 2.4-13

2.4.4 Parking

2.4.4.1 *Vehicle Parking*

The Plan would implement parking maximums for all land uses, as summarized Table 2.4-4.

Table 2.4-4: Vehicle Parking Maximums

Land Use	Minimum Parking	Soft Maximum Parking (per bedroom or per 1000 SF)[1]	Hard Maximum Parking (per bedroom or per 1,000 SF)
Multifamily Residential	--	0.6	0.7
Office	--	1.5	2.2
R&D	--	1.0	1.6
Light Industrial	--	0.4	0.6
Retail and Dining	--	2.0	2.5
Hotel	--	0.7	0.9
Other non-residential uses	--	2.0	2.5

Notes:

[1] To exceed soft maximum, certain requirements must be met including all parking must be shared, a parking demand study must be submitted to demonstrate the need for additional parking, and parking management plan must be prepared.

All electric vehicle (EV) parking would meet the specifications of either Calgreen Tier 2 or Tier 3 Electric Vehicle Supply Equipment (EVSE). New development would provide EV parking as summarized in Table 2.4-5.

Table 2.4-5: EV Parking Requirements

Land Use	EV Parking Spaces
Residential	At least 1 parking space per 25 total spaces (round up) shall be equipped with a Tier 2 or Tier 3 EVSE charger.
Non-Residential	At least 1 parking space per 25 total spaces (round up) shall be equipped with a Tier 2 and Tier 3 EVSE charger.

2.4.4.2 *Bicycle Parking*

Short-term and long-term bicycle parking would be required onsite for all development in the Plan, as summarized in Table 2.4-6. Ten percent of the total required bicycle spaces would need to accommodate cargo/adaptive bicycles. In addition, one outlet or charger would need to be provided per five total spaces to accommodate electric bicycles.

Table 2.4-6: Bicycle Parking

Land Use	Total Required Space	Short Term[1] Spaces (percentage)	Long-Term[2] Spaces (percentage)
Residential	1 per unit	25	75
Office	0.67 per 1,000 sf	25	75
R&D	0.67 per 1,000 sf	25	75
Light Industrial	0.1 per 1,000 sf	25	75
Retail	0.4 per 1,000 sf	75	25
Dining	0.5 per 1,000 sf	75	25
Other	Determined by zoning administrator	75	25

Notes:

[1] Short-term bicycle parking is intended to serve visitors to a site who generally stay for a short time (i.e., less than four hours).

[2] Long-term bicycle parking is intended to serve visitors who generally stay for four hours or longer.

2.4.5 Utility Improvements

2.4.5.1 *Stormwater*

The Plan area is served by existing catch basins and storm drainpipes in Quarry Road, Bragato Road, Taylor Way, and Industrial Road. The stormwater is then conveyed into drainage ditches on the north side of Holly Street and the south side of US 101, which convey water to the right-hand shoulder of southbound 101 into a series of underground storm drainpipes that collect runoff and convey it beneath Highway 101 and into Phelps Slough. Phelps Slough drains runoff into a retention pond in Redwood Shores before it is pumped into Steinberger Slough, which ultimately drains into the San Francisco Bay.

The 2017 City of San Carlos Storm Drain Master Plan identified several storm drainpipes within the Plan area as being undersized, including an 18-inch pipe in Quarry Road, 24-inch pipe in Industrial Road, and 16-inch pipe in Bragato Road. Future development under the Plan would require construction of new storm drain pipes or development would be required to pay a fair share contribution to the improvement.

The Plan would include green stormwater infrastructure improvements along all roadways.[10]

2.4.5.2 *Sanitary Sewer*

Local wastewater is collected and conveyed to sanitary sewer mains in Industrial Road, which is then conveyed to the Silicon Valley Clean Water system and ultimately to the Silicon Valley Clean Water Wastewater Treatment Plant. The 2013 Sanitary Sewer Master Plan identified sewer lines within the Plan area that need repairs or replacements, including:

- A portion of sewer main along Industrial needs localized repairs
- A portion of sewer main along Quarry Road needs localized repairs
- A portion of sewer main along Old County Road needs localized repairs
- A portion of sewer main along Quarry Road needs replacement
- Several sewer mains that are smaller than eight inches will require replacement with larger pipe sizes for future development

Future development within the Plan area, as implementation occurs over 20 years, would need to conduct project-level analyses to account for then-existing conditions to determine whether the existing infrastructure could accommodate project flows (refer to discussion in Section 3.19 Utilities and Service Systems).

2.4.5.3 *Domestic Water Infrastructure*

The Plan area is served by water mains in Old County Road, Quarry Road, Bragato Road, Taylor Way, and Industrial Road.

The Plan would require that new development projects incorporate sustainable water use options, such as utilizing recycled water (if available) or on-site alternative water sources, such as graywater re-use systems, rainwater harvesting and re-use, or blackwater treatment and re-use systems.

2.4.6 Resiliency Standards

As shown on Figure 2.4-14, the southeastern corner of the Plan area is located within the 100-year flood zone. Development within the 100-year flood zone would be required to elevate the first floor above the 100-year base flood elevation.

To address flood risk and reduce impacts on existing drainage infrastructure, the Plan would require that all development implement the following resiliency standards summarized in Table 2.4-7.

The Plan also includes additional standards in the Sea Level Priority Zone and Creek Front Zone. The Sea Level Priority Zone encompasses the historic San Francisco Bay Shoreline, as shown on Figure

[10] Green stormwater infrastructure uses vegetation, soils, and natural processes to manage water and create healthier urban environments.

2.4-14. The Creek Front Zone is the area directly adjacent to Belmont Creek as shown on Figure 2.4-15. The Plan would increase the setback from Belmont Creek for properties undergoing redevelopment adjacent to Belmont Creek to 35 feet from top of bank.

Table 2.4-7: Resiliency Development Standards

Standard	Description
Plan-Wide Development Standards	
Open Space Dedication	For properties greater than one acre (gross), new development shall dedicate 15 percent of the total site area toward open space. All new open space shall adhere to the landscaping standards in Chapter 18.18 of the SCMC. All new residential development would be required to comply with SCMC Section 17.32.030 and provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere.
Stormwater Management	All future development in the Plan would be required to prepare a project-specific hydrology and hydraulic analysis to demonstrate that peak stormwater flow is reduced compared to pre-development conditions at the point of connection to the existing storm drain system under a 10-year storm. When a project is developed and there is no storm drain main serving that site or the new green infrastructure implemented by the development, a new public storm drain main shall be extended to the project site and along the length of the project frontage.
Groundwater Rise Vulnerability	New development shall coordinate with the City of San Carlos and One Shoreline to assess groundwater rise vulnerability and identify implementing measures to protect new buildings from flooding and reduce impact on existing drainage infrastructure.
Municipal Regional Stormwater Permit	New development shall be subject to the Municipal Regional Stormwater Permit (MRP). For redevelopment projects, the “50 Percent Rule” shall apply as noted in the San Mateo County C.3 Regulated Projects Guide. Projects that alter or replace less than 50 percent of existing impervious surface shall treat stormwater runoff only from the portion of the site that is redeveloped. Projects that alter or replace 50 percent or more of the existing impervious surface shall treat runoff from the entire site.

Standard	Description
Flooding Adaptation	All new development within the Plan, regardless of whether the site is located within the 100-year flood zone shall adhere to the San Carlos Municipal Code, Chapter 15.56 - Flood Damage Prevention. Critical site infrastructure (such as transformers and generators) shall be elevated to provide resilience to current and future flooding conditions in the area. The City of San Carlos shall determine on a case by case basis if an individual project requires a building height variance to accommodate proposed finished floor elevations that have been elevated to provide flood resilience. For any new development within a 100-year flood zone, the project would be required to set the finished floor elevation above the 100-year base flood elevation (BFE).[11]
Sea Level Rise	Future development shall assess sea level rise risk for the site and elevate the finished floor elevation of the new building further above the 100-year BFE to provide resiliency to future sea level rise (2050).
Sea Level Rise Priority Zone	
Drainage Channel Setback	All development adjacent to an existing drainage channel would be required to adhere to additional regulations, including a minimum 25 feet setback from the edge of the channel. The setback shall be a natural buffer to support stormwater management.
Open Space Design	Developments in this zone would be required to provide engineering detention basins as part of the open space dedication.
Parking Areas	Parking areas within this zone shall include low impact development (LID) strategies such as permeable paving and enhanced green infrastructure facilities.
Creek Front Zone	
Open Space Design	20 percent of each development site area shall be dedicated to open space. All landscaped open spaces in this zone would remain accessible to the public.
Belmont Creek Setback	Development shall setback 35 feet from the existing top of bank.
Riparian Bank	The first 25 feet from the top of bank shall comprise of native riparian vegetation. This area, an interface between the creek and the terrestrial environment

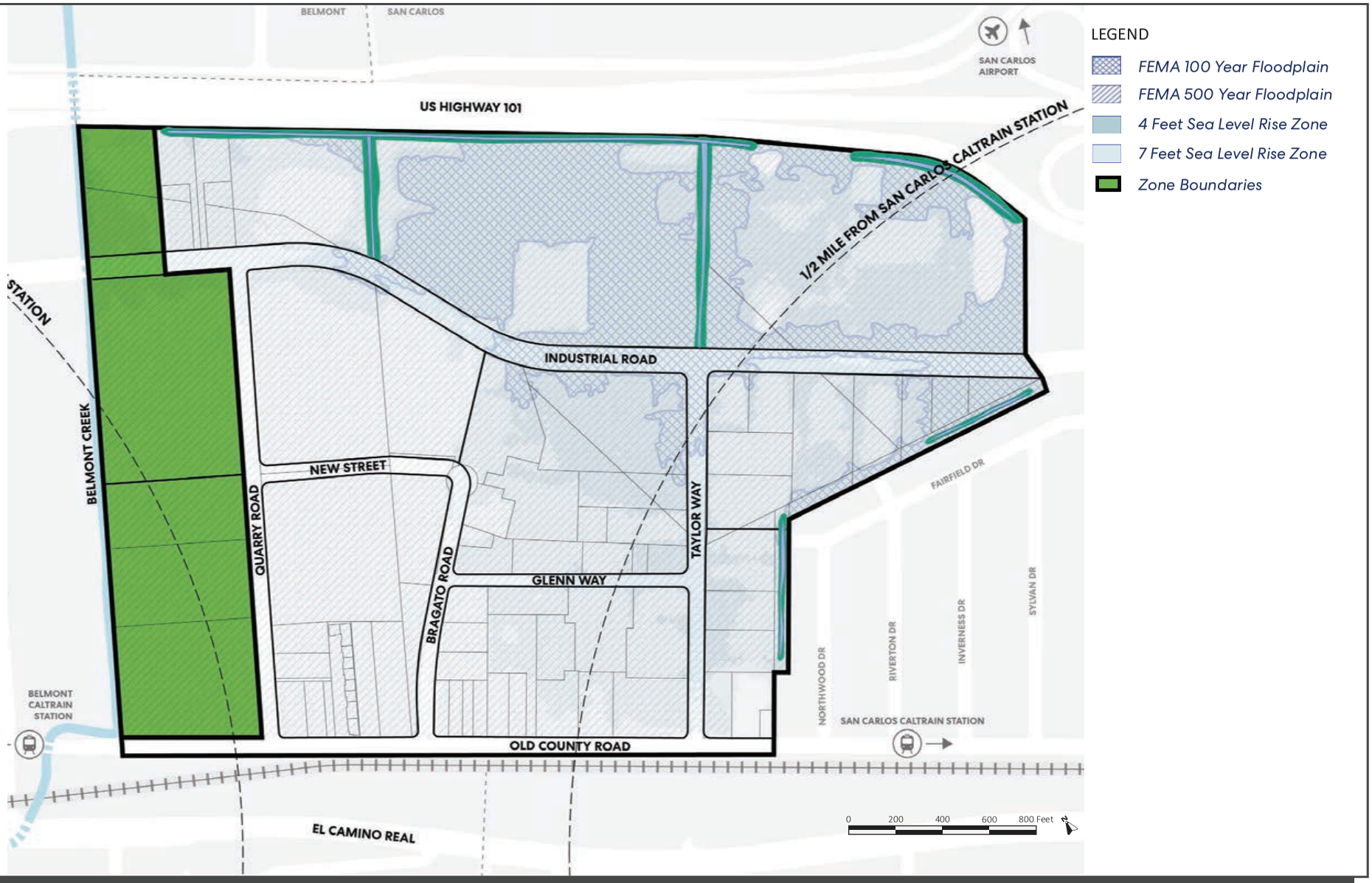
[11] This does not account for any elevation for future sea level rise.

Standard	Description
	supports diverse habitats, and helps maintain water quality by preventing erosion and filtering pollutants.
Multi-Use Path	A multi-use path for pedestrians and bicyclists shall be built along the riparian landscape. The pathway shall be at least 10 feet in width and shall be within the required 35-foot Belmont Creek Setback.
Spillover Frontage	Development should allow an additional buffer of 15 feet from the multi-use path to the building edge for greater flooding protection and flexible recreational spaces.



SEA LEVEL PRIORITY ZONE

FIGURE 2.4-14



CREEK FRONT ZONE

FIGURE 2.4-15

2.4.7 Transportation Demand Management

All new development in the Plan would be subject to Transportation Demand Management (TDM) requirements, unless otherwise noted below. The requirements are summarized in Table 2.4-8 and Table 2.4-9 below.

Residential developments that are 100 percent affordable would be exempt from TDM requirements. Additionally, the Community Development Director may grant an administrative exemption that reduces, modifies, or waives parts or all required TDM elements on a project-by-project basis.

Table 2.4-8: Residential TDM Requirements

TDM Strategy	Small Projects (24 to 49 units)[1]	Large Projects (50 units or more)
Provide non-driving transportation subsidies (free or discounted transit passes, bicycle subsidies, etc.)	--	Required
Implement non-driving education/marketing/ programs	Required	Required
Retain an TDM coordinator or contact (on or off-site)	Required	Required
Unbundled Parking	Required	Required

Notes:

[1] Residential projects with fewer than 24 units are exempt from TDM requirements.

Table 2.4-9: Non-Residential TDM Requirements

TDM Strategy	Small Projects (10,000 to 49,999 GSF)[1]	Large Projects (50,000 GSF or greater)
Unbundled Parking	Required	Required
Provide parking cash-out option	Required	Required
Provide non-driving transportation subsidies (free or discounted transit passes, bicycle subsidies, etc.)	--	Required
Provide pre-tax transportation benefits	Required	Required
Provide ride matching services	Required	Required
Implement non-driving education/marketing/ programs	Required	Required
Retain an on-site TDM coordinator or contact	--	Required
Provide a bike repair station	Required	Required

Notes:

[1] Projects less than 10,000 GSF are exempt from TDM requirements.

2.4.8 Sustainable Design Features

All new development would be built in accordance with the latest Building Energy Efficiency Standards and California Green Building Standards Code (CalGreen). The City of San Carlos regularly adopts each new CALGreen update under the SCMC Chapter 15.04.125 Title 24, Part 11. The Plan includes the following range of measures to be implemented on a project-by-project basis:

- Green parking lots
- Green roof with solar
- Rainwater collection systems
- Permeable pavement
- EV parking

2.5 Project Objectives

The primary purposes of the proposed project are to develop policies and standards to guide new development in the northeast area of San Carlos over a 20-year horizon and to:

1. Celebrate and maintain the area's industrial legacy by continuing to allow for light industrial, research and development, including offices, in a way that supports both existing and new businesses within the overall district and supports economic development and fiscal stability.

2. Introduce housing in the district to balance the needs of living wage jobs, while accommodating future population growth in San Carlos to meet housing needs as part of future Housing Element cycles.

3. Support district wide access for all users, employees – future residents – and visitors alike, by providing multi-modal infrastructure that supports walkability, bikeability, public transportation, and vehicular transportation.

4. Address flooding and sea level rise through a robust resilience framework including improvements to Belmont Creek and green stormwater infrastructure.

5. Plan for the anticipated 4.5 million square feet of net new non-residential development through development standards and a community benefits framework that leverages public open space, street and trail improvements, and financial contributions that deliver tangible amenities that serve the district and broader community.

2.6 Uses of the EIR

This EIR provides decision-makers and the general public with relevant environmental information to use in considering the proposed Plan. Future development projects proposed under the Plan would be examined in light of this EIR to determine whether additional environmental review is needed. It is expected that this EIR would be used for appropriate discretionary and other approvals

necessary to implement the project, as proposed. These actions may include, but are not limited to, the following approvals:

- Specific Plan adoption
- General Plan Amendments
- Zoning Map Amendment
- Zoning Ordinance Amendment

Section 3.0 Environmental Setting, Impacts, and Mitigation

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

3.1	Aesthetics	3.11	Land Use and Planning
3.2	Agriculture and Forestry Resources	3.12	Mineral Resources
3.3	Air Quality	3.13	Noise
3.4	Biological Resources	3.14	Population and Housing
3.5	Cultural Resources	3.15	Public Services
3.6	Energy	3.16	Recreation
3.7	Geology and Soils	3.17	Transportation
3.8	Greenhouse Gas Emissions	3.18	Tribal Cultural Resources
3.9	Hazards and Hazardous Materials	3.19	Utilities and Service Systems
3.10	Hydrology and Water Quality	3.20	Wildfire

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Mitigation measures are numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.
- **Cumulative Impacts** – This subsection discusses the project's cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts "when the project's incremental effect is cumulatively considerable." The discussion does not need to be in as great detail as is necessary for project impacts, but is to be "guided by the standards of practicality and reasonableness."

The purpose of the cumulative analysis is to allow decision makers to better understand the impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)). This EIR uses a combination of both the "list" method and projection approach. The City of San Carlos certified the 2045 General Plan Reset EIR on May 27, 2025. The development projections in the EIR included citywide buildout capacity through 2045 (including the Plan).

The analysis must determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

Table 3.0-1 identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis.[12]

[12] Approved and pending projects within the Plan boundaries are not reflected in this table since the growth associated with these projects has been accounted in the Plan's development projections (refer to Table 2.4-1).

Table 3.0-1: Cumulative Projects List

Name and Location	Description	Distance to Proposed Project	Status
Belmont Harbor Industrial Area (HIA) Specific Plan (City of Belmont)	The City of Belmont is currently preparing a Specific Plan for a portion of the HIA, specifically a 62-acre area east of Old County Road and west of Highway 101, and directly north of the Plan area. The Plan would be built out over a period of 25 years and assumes up to 3,900,000 square feet of non-residential development and 303 residential units.	Adjacent	Under Review
601 Harbor Boulevard (City of Belmont)	Construction of an approximately 380,000 square feet, four-story life sciences building, including three levels of below-grade parking on an approximately 3.5-acre site located on the corner of Old County Road and Harbor Boulevard.	Adjacent	Approved
1301 Shoreway Road (City of Belmont)	Redevelopment of a 6.9-acre site currently developed with a 148,919 square feet office building and associated parking lot and basketball court. The new development would include construction of Class-A buildings for office, technology, and/or R&D, including life sciences, specifically one seven-story 271,589 square feet building, one eight-story 270,446 square feet building, and one nine-level 441,280 square feet parking garage.	0.1	Under Review
Alexandria District for Science and Technology (900, 960, 961, 967 Industrial Road; 1003, 1011 Commercial Street; and 915, 1055 and 1063 Old County Road, City of San Carlos)	The project involves construction of an office/research and development (R&D) campus-style development (totaling 1,734,532 square feet) on the approximately 25.34-acre site bounded by Industrial Road to the east, Commercial Street to the north, Old County Road to the west, and Pulgas Creek to the south.	0.7	Under Review
789 Old County and 1026 Bransten Road	Project includes demolition of the existing buildings and construction of two new Life Science Research & Development buildings (totaling	0.7	Under Review

	320,117 square feet) and one parking structure (694 parking spaces).		
841 Old County Road Project (803-851 Old County Road, San Carlos)	The proposed project would involve the demolition of all existing buildings and site improvements and the construction of two new office / research and development (R&D) buildings: a 5-story, 193,852 square foot building, and a 4-story, 131,621 square foot building, with maximum heights of approximately 90 and 113 feet respectively, above a two-level underground parking structure.	0.8	Approved

For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 3.0-2 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 3.0-2: Geographic Considerations in Cumulative Analysis

Resource Area	Geographic Area
Aesthetics	Plan sites and adjacent parcels
Agriculture and Forestry	San Mateo County
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Plan sites and adjacent parcels
Cultural Resources	Plan sites and adjacent parcels (subsurface resources); Citywide (historic resources)
Energy	Energy provider's territory
Greenhouse Gas Emissions	Planet-wide
Hazards and Hazardous Materials	Plan sites and adjacent parcels
Hydrology and Water Quality	Belmont Creek watershed
Land Use and Planning	Citywide
Noise and Vibration	Plan sites and adjacent parcels
Transportation/Traffic	Citywide
Tribal Cultural Resources	Plan sites and adjacent parcels
Utilities and Service Systems	Citywide or utility service provider (e.g. SVCW)

3.1 Aesthetics

3.1.1 Environmental Setting

3.1.1.1 *Regulatory Framework*

State

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and requires lead agencies to use alternatives to level of service (LOS) for evaluating transportation impacts, specifically vehicle miles traveled (VMT). SB 743 also included changes to CEQA that apply to transit-oriented developments, as related to aesthetics and parking impacts. Under SB 743, a project's aesthetic impacts will no longer be considered significant impacts on the environment if:

- The project is a residential or mixed-use residential project, or employment center project and
- The project is located on an infill site within a transit priority area (TPA).[13]

SB 743 also clarifies that local governments retain their ability to regulate a project's aesthetics impacts outside of the CEQA process.

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. Interstate 280 (I-280) from the San Mateo County line to State Route (SR) 17, which includes segments adjacent to San Carlos, is an eligible, but not officially designated, State Scenic Highway.[14]

[13] An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." A "transit priority area" is defined as "an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: California Legislative Information. "Chapter 2.7. Modernization of Transportation Analysis for Transit-Oriented Infill Projects [21099- 21099.]." Accessed August 10, 2024. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=13.&part=&chapter=2.7.&article=.

[14] California Department of Transportation. "Scenic Highways." Accessed August 10, 2024. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

Local

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating aesthetic impacts resulting from planned development within the City including the following:

Policy	Description
LU-8.1	Require all development to feature high quality design that enhances the visual character of San Carlos.
LU-8.2	Ensure that new development is sensitive to the character of adjacent structures and the immediate neighborhood.
LU-8.3	Encourage design features and amenities in new development and redevelopment, including, but not limited to: a. Interconnected street layout. b. Clustering of buildings. c. Landscaping on each lot. d. Visual buffers. e. Facilitation of pedestrian activity. f. Distinctiveness and variety in architectural design.
LU-8.4	Promote pedestrian-scaled design through site planning, building design, finish details and landscaping for all types of development by requiring height and locational transitions between buildings of varied levels that are sensitive to the interrelationships of surrounding uses and structures, especially residential.
LU-8.5	Optimize architectural quality by encouraging the use of quality materials, particularly as accents and authentic detailing, such as balconies and window trims.
LU-8.9	Encourage the design of attractive outdoor pedestrian spaces that encourage impromptu public gathering places with features such as plazas, interior walkways and paseos, ornamental gates, trellises, lighting, trees and landscaping, seating and fountains.
LU-8.10	On all sides of buildings, require the incorporation of quality architectural design elements for all building façades and stepping back upper floors in order to reduce bulk and mass and to break up monotonous wall lines.
LU-8.11	Discourage abrupt changes in building scale. A gradual transition between low-rise to mid-rise buildings should be achieved by using the low-rise buildings at the edge of the project site. Consider the relationship of buildings to the street, to one another and to adjacent structures and land uses, especially single-family residential.
LU-8.13	Require parking areas associated with development to be located and designed to minimize visual impact to the greatest extent feasible. This may include locating parking behind buildings street frontage, below grade, or screening through the use of natural landscaping.
LU-8.16	Require high quality signage through design, use of materials and colors compatible with and complementary to the architectural character of the building(s) and surrounding.
LU-9.9	Encourage the design of development to minimize the obstruction of significant views of the San Francisco Bay, the western hills, or other significant natural vistas to the greatest extent possible.

Policy	Description
EM-1.4	Protect and preserve the circadian cycle (the cycle of night and day) by limiting sources of light during nighttime hours.
CSS-4.6	Prohibit land uses and development which emit odors, particulates, light glare, or other environmentally sensitive contaminants from being located within proximity of schools, community centers, senior homes and other sensitive receptors. Sensitive receptors shall be prohibited from locating in the proximity of environmentally sensitive contaminants.

City of San Carlos Municipal Code

City of San Carlos Municipal Code Chapter 18.29 specifies the City's design review process. Chapter 18.29.060 specifies that to obtain design review approval, projects must satisfy these criteria to the extent they apply:

- The overall design of the project including its scale, massing, site plan, exterior design, and landscaping will enhance the appearance and features of the project site and surrounding natural and built environment.

- The project design is appropriate to the function of the project and will provide an attractive and comfortable environment for occupants, visitors, and the general community.

- Project details, materials, signage and landscaping are internally consistent, fully integrated with one another, and used in a manner that is visually consistent with the proposed architectural design.

- The project has been designed to be compatible with neighboring development by avoiding big differences in building scale and character between developments on adjoining lots in the same zoning district and providing a harmonious transition in scale and character between different districts.

- The project contributes to the creation of an attractive and visually interesting built environment that includes a variety of building styles and designs with well-articulated structures that present varied building facades, roof lines, and building heights within a unifying context that encourages increased pedestrian activity and promotes compatibility among neighboring land uses within the same or different districts.

- The design of streetscapes, including street trees, lighting, and pedestrian furniture, is consistent with the character of activity centers, commercial districts and nearby residential neighborhoods.

- The proposed design is compatible with the historical or visual character of any area recognized by the City as having such unified character.

- The project design preserves major public views and vistas from major public streets and open spaces and enhances them by providing areas to stroll, benches to rest and enjoy views, and similar amenities.

- Lighting and lighting fixtures are designed to complement buildings, be of appropriate scale, provide adequate light over walkways and parking areas to create a sense of pedestrian safety, and avoid creating glare.

- The proposed building design and landscaping supports public safety and security by allowing for surveillance of the street by people inside buildings and elsewhere on the site.

- Landscaping is designed to be compatible with and enhance the architectural character and features of the buildings on site and help relate the building to the surrounding landscape. Proposed planting materials avoid conflicts with views, lighting, infrastructure, utilities, and signage.

3.1.1.2 *Existing Conditions*

The City of San Carlos is divided into a series of six geographic areas, each reflecting the area's unique character and distinctive land use pattern. The approximately 145-acre Plan area is located within the Harbor Industrial Area, roughly bound by Belmont Creek, U.S. 101, the western property lines of the residential parcels along Northwood Drive, the northeastern property lines of the residential parcels along Fairfield Drive, and the southeast property line of the PAMF and western edge at Old County Road.

The Plan is located in an urbanized setting in San Carlos and is developed with large manufacturing businesses, biotechnical and biomedical firms, and light and heavy industrial uses. Density within the Plan is greatest along Quarry Road, with limited spacing between buildings and small amounts of landscaping. The area opens up along Industrial Road, where landscaping and surface parking creates greater division among development, and building heights increase. Building heights in the Plan area range between one to four stories, with parcels on Industrial Road ranging from one to four stories, whereas parcels on all other roadways range from one to two stories. All roadways within the Plan consist of two lanes other than Industrial Road, which is a four-lane roadway.

Views along Industrial Road are partially blocked by development, although the wide road and parcel spacing allows for slight views of hillsides to the west. Partial hillside views are available heading west on Bragato Road and Taylor Way, and west of Glenn Way. Views west of Old County Road are blocked by the raised Caltrain tracks. The PAMF (301 Industrial Road), Delta Star (270 Industrial Road), and Natera/Curia Global/Lake Pharma (201 Industrial Road) developments contain the most visually prominent buildings in the Plan due to their height and mass.

Visual Character of the Surrounding Area

The area surrounding the Plan area is urbanized. The Greater San Carlos Neighborhood, which is located south of the Plan area, consists of single-family detached housing. Belmont Creek makes up the northern boundary of the Plan, north of which is the City of Belmont. The closest development to the Plan in the City of Belmont consists of one to two story industrial land uses along Harbor Boulevard. East of the Plan area is U.S. 101, which is adjacent to a mix of commercial and industrial land uses. West of the Plan area is El Camino Real (CA-82), Caltrain tracks, and residential and commercial land uses.

Scenic Vistas

Scenic vistas are defined in this document as natural landscapes that provide views of unique flora, geologic or other natural features that are generally free from urban intrusions. Typical scenic vistas include views of mountains and hills, large, uninterrupted open spaces and waterbodies. San Carlos has varied topography which ranges from land at sea level on the east to the hilly western portion of the City with elevations up to 900 feet on the west. The City does not have any formally recognized scenic vistas but residents enjoy and highly value views of San Francisco Bay on the eastern side of the city and the Santa Cruz Mountains west of the city. The Plan area is not visible from the shoreline of the San Francisco Bay nor does the Plan area provide views of the shoreline.

Scenic Highways and Roadways

There are three types of scenic roads near or in the City:

- State scenic highways,
- County scenic highways, and
- City scenic roads.

State Scenic Highways

There are no State scenic highways in San Carlos. I-280 is a state scenic highway located near the City, which is approximately 2.8 miles southwest of the project site. I-280 is not visible from the project site.

County Scenic Corridors

Edgewood Road and Cañada Road are two County-designated scenic corridors located near the City, which are approximately 2.0 miles south and 3.5 miles west of the project site, respectively. These County scenic highways are not visible from the project site.

Scenic Road

According to the General Plan, there are seven City-designated scenic roads in San Carlos:

- Alameda de las Pulgas (approximately 0.8 miles southwest of the site),
- San Carlos Avenue (approximately 0.5 mile south of the site),
- Brittan Avenue, which intersects with Industrial Road (approximately 1.0 mile south of the site),
- Club Drive (approximately 1.3 miles west),
- Crestview Drive (approximately 2.1 miles west),
- El Camino Real (approximately 300 feet west), and
- Holly Street, which intersects with Industrial Road (approximately 500 feet south).

Views of the Plan area from the City-designated scenic roads are limited.

Light and Glare

The project is in a developed urban area. Sources of light and glare are abundant in the urban environment of the project area, including, but not limited to, streetlights, parking lot lights, security lights, vehicular headlights, internal building lights, and reflective building surfaces and windows.

Location within a Transit Priority Area

Pursuant to SB 743, "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment." The Plan is a mixed-use residential, industrial and employment center project in an infill location. As mapped on Figure 4-1 of the 2045 General Plan Reset EIR as well as Figure 12 of Appendix G of this EIR, all parcels within the Plan area are within a TPA, as parcels within the Plan area are located within one-half mile of an existing, major transit stop.

3.1.2 Impact Discussion

For the purpose of determining the significance of the project's impact on aesthetics, except as provided in Public Resources Code Section 21099, would the project:

1) Have a substantial adverse effect on a scenic vista?
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[15] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

[15] Public views are those that are experienced from publicly accessible vantage points.

3.1.2.1 *Project Impacts*

Pursuant to SB 743, "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a TPA shall not be considered significant impacts on the environment." The Plan is a mixed-use residential, industrial and employment center project in an infill location within a TPA. As a result, pursuant to SB 743, buildout of the Plan would have a less than significant aesthetic impacts. The following discussion is for informational purposes only.

a) Would the project have a substantial adverse effect on a scenic vista?

As mentioned in Section 3.1.1.2, there are no designated scenic vistas within the Plan area or the City. The Plan area and surrounding areas are relatively flat and views are limited. Views along Industrial Road are partially blocked by development, although the wide road and parcel spacing allow for slight views of hillsides to the west. Partial hillside views are available heading west on Bragato Road and Taylor Way, and west of Glenn Way. Views west of Old County Road are blocked by the raised Caltrain tracks. While buildout of the Plan could result in the development of buildings of up to 155 feet in height (includes the maximum height bonus) and would block views from existing adjacent developments, private views are not protected scenic resources under CEQA. As a result, the Plan would not result in a substantial impact on any scenic vistas or resources. **(Less than Significant Impact)**

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no State scenic highways in San Carlos. I-280 is a state scenic highway located near the City, which is approximately 2.8 miles southwest of the Plan. No portion of the Plan is visible from I-280. Therefore, implementation of the Plan would not damage scenic resources within a state scenic highway. **(No Impact)**

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The Plan area as well as the surrounding area are urbanized.

The Plan would create new zoning districts and corresponding design requirements that would apply to the parcels located within the Plan area. As shown on Figure 2.4-2, portions of the Plan would be reclassified to Mixed-Use, 75-90 du/acre Zoning District. The Mixed-Use, 75-90 du/acre Zoning District would permit both commercial and multi-family residential uses at residential densities of 75-90 dwellings units per acre. Therefore, implementation of the Plan would change the visual conditions of the Plan area by introducing new residential buildings to the Plan area while

also allowing up to 4,508,000 additional square feet of non-residential land uses. The Plan would also increase open space and create and enhance circulation connections.

Development within the Plan area would be subject to the design review and objective design standards compliance review process required by Section 18.29 of the Zoning Code, which requires design review for projects that require a permit for new construction, reconstruction, rehabilitation, or alteration. This review process ensures that all future redevelopment projects under the Plan would be evaluated for their compatibility with their surroundings, harmonious transitions in scale and character between different land uses, safety, integration of natural features, appropriate construction materials, and other aspects. Therefore, the Plan would not conflict with applicable regulations governing scenic quality. **(Less than Significant Impact)**

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

As discussed under Section 3.1.1.2, existing sources of light and glare are abundant in the urban environment of the Plan, including, but not limited to, streetlights, parking lot lights, security lights, vehicular headlights, internal building lights, and reflective building surfaces and windows. Implementation of the Plan would introduce a new street network and new uses that would create additional sources of light in the Plan area, including additional streetlights, exterior and interior lighting, and vehicle headlights. In addition, the proposed 10-foot-wide trail along Belmont Creek would include pedestrian-scale lighting. Implementation of the Plan could result in spillover lighting, skyglow or nighttime illumination, or glare. However, all future development in the Plan would be subject to the lighting standards in SCMC 18.15.070, which exist to minimize outdoor artificial light and reduced illumination on adjacent lots.

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not cause a substantial new source of light or glare that would adversely affect day or nighttime views in the Plan with compliance with General Plan goals, policies, and actions, such as those described in Section 3.1.1.1 Regulatory Framework.

City Zoning Code Section 18.29 requires design review before issuance of a permit for new construction, reconstruction, rehabilitation, or alterations. This review process investigates the proposed project's effects on light and glare and would not allow the issuance of a building permit for a project that would adversely affect light and glare conditions in San Carlos. Adherence with the City's Municipal Code and the Design Review process would ensure that new sources of light and glare do not adversely affect day or nighttime views in the area. **(Less than Significant Impact)**

3.1.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative aesthetics impact?

The geographic area for cumulative aesthetic impacts is limited to the Plan area and adjacent parcels in which the plan area would be visible. Buildout of the Plan would result in the construction of buildings up to 155 feet height, which would be visible from the existing land uses and surrounding roadways. As mentioned previously, the Plan area is not located along or visible from a state-designated scenic highway or a scenic vista. Although full buildout of the Plan would alter the visual character of the area, future development proposed under the Plan would be compatible with the existing land uses in the area due to compliance with the design review findings, including standards to prevent light and glare impacts. The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not cause a cumulatively considerable contribution to a significant aesthetic impact with compliance with General Plan goals, policies, and actions, such as those described in Section 3.1.1.1 Regulatory Framework. For these reasons, the Plan would not result in a cumulatively considerable contribution to a cumulative aesthetic impact. **(Less than Significant Cumulative Impact)**

3.2 Agriculture and Forestry Resources

3.2.1 Environmental Setting

3.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[16]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[17]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[18] Programs such as CAL FIRE's Fire and Resource Assessment Program are used to identify whether forest land, timberland, or timberland production areas could be affected are located on or adjacent to a project site.[19]

[16] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed July 26, 2024. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[17] California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.
[18] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[19] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed July 26, 2024. http://frap.fire.ca.gov/.

3.2.1.2 *Existing Conditions*

The Plan area is designated as Urban and Built-Up Urban, which is defined as land that is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10 acre-parcel.[20]

The Plan does not include forest land or timberland.

The project area is currently developed with buildings and parking facilities. The project area and adjacent uses are not used or zoned for agriculture, forestry, or timberland and the Plan area (refer to Figure 2.2-1) is not the subject of a Williamson Act contract.

3.2.2 Impact Discussion

For the purpose of determining the significance of the project's impact on agriculture and forestry resources, would the project:

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

3.2.2.1 *Project Impacts*

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

As discussed above in Section 3.2.1.2 Existing Conditions, the Plan area is designated as Urban and Built-Up Land and none of the sites within the Plan are designated as farmland pursuant to FMMP maps. Therefore, implementation of future development under the Plan would not convert Prime

[20] California Department of Conservation. *California Important Farmland Finder.* Accessed September 11, 2024. https://maps.conservation.ca.gov/DLRP/CIFF/

Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. **(No Impact)**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

As discussed above in Section 3.2.1.2 Existing Conditions, none of the sites within the Plan are zoned for agricultural use. None of the sites within the Plan are subject to a Williamson Act contract.[21] Therefore, implementation of the Plan would not conflict with existing zoning for agricultural use or a Williamson Act contract. **(No Impact)**

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

As discussed in Section 3.2.1.2 Existing Conditions, the sites within the Plan do not meet the definition of forest land or timberland, nor are the sites used or zoned for forest land, timberland, or timberland zoned Timberland Production. Therefore, implementation of the proposed project would not conflict with existing zoning for, or cause the rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?

The sites within and adjacent to the Plan are not designated as forest land, as discussed in Section 3.2.1.2 Existing Conditions. The Plan, therefore, would not result in a loss of forest land or a conversion of forest land to non-forest use. **(No Impact)**

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

As discussed in Section 3.2.1.2 Existing Conditions and under checklist questions a) through d) above, the sites within and adjacent to the Plan are not designated for agricultural use or forest land. Therefore, implementation of the Plan would not result in the conversion of farmland or forest land to a non-agricultural or non-forest use. **(No Impact)**

[21] San Mateo County. *San Mateo County GIS open data – Williamson Act Parcels.* Accessed September 11, 2024. https://data-smcmaps.opendata.arcgis.com/datasets/williamson-act-parcels/explore

3.2.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact?

The geographic area for cumulative agricultural and forestry impacts is San Mateo County. The implementation of the Plan would not impact agricultural, forestry, and/or timberland (see discussions under checklist questions a) through e) above); therefore, implementation of the Plan would not contribute to a cumulative impact to those resources. **(No Cumulative Impact)**

3.3 Air Quality

The following discussion is based, in part, on an Air Quality and Greenhouse Gas Assessment completed by Illingworth & Rodkin, Inc. dated March 28, 2025. This report is included as Appendix B to this EIR.

3.3.1 Environmental Setting

3.3.1.1 *Background Information*

Criteria Pollutants

Criteria air pollutants are pollutants that have established federal or State standards for outdoor concentrations to protect public health. Pursuant with the federal and State Clean Air Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforced the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM_{10}), particulate matter with a diameter of 2.5 micros or less ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. The CAAQS also includes visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Unlike criteria air pollutants, which have a regional impact, TACs are highly localized and regulated at the individual emissions source level.

DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. DPM is comprised of diesel exhaust which is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (i.e., areas most susceptible to injury).[22] Chemicals in diesel exhaust, such as benzene and formaldehyde, are also TACs identified by the CARB.

An overview of the sources of criteria pollutants and TACs, as well as their associated health effects, is provided in Table 3.3-1.

[22] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed September 3, 2024. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Table 3.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants

Pollutants	Description and Sources	Primary Effects
Ozone (O_3)	O_3 is a secondary criteria air pollutant that is the result of a photochemical (sunlight) reaction between reactive organic gases (ROG) and nitrogen oxides (NO_x). Pollutants emitted by motor vehicles, power plants, industrial boilers, refineries, and chemical plants are the common sources for this reaction. High O_3 levels are caused by the cumulative emissions of ROG and NO_X. These precursor or primary pollutants react under certain meteorological conditions to form high O_3 levels. Commons sources of ROG and NO_x are vehicles, industrial plants, and consumer products.	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	NO_2 is a reactive gas that combines with nitric oxide (NO) to form NO_x. NO_2 is the byproduct of fuel combustion, with common sources of NO_2 being emissions from cars, trucks, buses, power plants, and off-road equipment. Other sources of NO_2 include high temperature stationary combustion and atmospheric reactions.	• Aggravation of respiratory illness • Reduced visibility
Carbon Monoxide (CO)	CO is a colorless, odorless, and toxic gas that is the product of incomplete combustion of carbon-containing substances (e.g., when something is burned). Common outdoor sources of CO include mobile vehicles (passenger cars and trucks) and machinery that burn fossil fuels.	• Interferes with oxygen delivery to the body's organ due to binding with the hemoglobin in the blood • Fatigue, headaches, confusion, and dizziness
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Particulate Matter (PM) is any material that is emitted as liquid or solid particles or a gaseous material, such as dust, soot, aerosols, and fumes. PM_{10} and $PM_{2.5}$ are both small enough particulates to be inhaled into the human lungs, and $PM_{2.5}$ is small enough to deposit into the lungs, which poses an increased health risk compared to PM_{10}. Typical sources of PM include stationary combustion of solid fuels, construction activities, vehicles, industrial processes, and atmospheric chemical reactions.	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Sulfur Dioxide (SO_2)	SO_2 is a pungent and colorless gaseous pollutant. SO_2 is part of the sulfur oxides (SO_x) group and is the pollutant of greatest concern in the SO_x group. SO_x can react with other compounds in the atmosphere to form small particles. These particles contribute to pollution. SO_2 is primarily formed from fossil fuel combustion at power plants and other industrial facilities. Sources of SO_2 include motor vehicles, locomotives, ships, and off-road diesel equipment that are operated with fuels that contain high levels of sulfur. Industrial processes, such as natural gas and petroleum extraction, oil refining, and metal processing.	• Aggravation of respiratory illness • Respiratory irritation such as wheezing, shortness of breath and chest tightness • Increased incidence of pulmonary symptoms and disease, decreased pulmonary function

Pollutants	Description and Sources	Primary Effects
Lead	Lead is a naturally occurring element that can be found in all parts of the environment including the air, soil, and water. As an air pollutant, lead is present in small particles. The most common historic source of lead exposure was the past use of leaded gasoline in motor vehicles. The exhaust resulting from use of leaded gasoline would release lead emissions into the air. Now, major sources of lead in the air are from ore and metals processing plants and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters.	• Adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system
Toxic Air Contaminants (TACs)	TACs include certain air pollutants known to increase the risk of cancer and/or a range of other serious health effects. Sources of TAC include, but are not limited to, cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; and building materials and products.	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following groups who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

Worker Receptors

In addition to the sensitive receptors mentioned above, the Bay Area Air District (formerly the Bay Area Air Quality Management District [BAAQMD]) considers worker receptors when reviewing impacts from air pollution and TACs. Worker receptors are adults (16 years and older) that work indoors and/or outdoors at off-site locations zoned for commercial and industrial uses. Typical developments that include worker receptors are offices, retail shops, manufacturing uses, light industrial uses, or heavy industrial uses.[23]

[23] Bay Area Air District. *California Environmental Quality Act Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards*. Page E-14.

3.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the EPA is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants discussed previously; PM, O_3, CO, SO_2, NO_2, and lead.[24]

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Diesel Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, this plan involves the application of emission control strategies to existing diesel vehicles and equipment to reduce DPM and other pollutants. Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment, including off-road equipment, will significantly reduce emissions of DPM and NO_X.

Regional

2017 Clean Air Plan

The Bay Area Air District is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area, which includes the project area. Regional air quality management districts, such as the Bay Area Air District, must prepare air quality plans specifying how federal and state air quality standards will be met. The Bay Area Air District's most recently adopted plan is the Bay Area 2017 Clean Air Plan. The 2017 Clean Air Plan focuses on the following two related Bay Area Air District goals and how to achieve them:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TAC; and

[24] NO_x is the group of nitrogen compounds (NO_2 and nitric oxide [NO]) that typically represents NO_2 emissions because NO_2 emissions contribute the majority of NO_x exhaust emissions emitted from fuel combustion.

- Protect the climate by reducing Bay Area greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2040 and 80 percent below 1990 levels by 2050.[25]

CEQA Air Quality Guidelines

The Bay Area Air District CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by the Bay Area Air District within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, the Bay Area Air District rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted on April 20, 2023, by the Bay Area Air District's Board of Directors.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating air quality impacts resulting from planned development within the City including the following:

Policy	Description
EM-6.1	Support and comply with the Bay Area Air Quality Management District, State and federal standards and policies that improve air quality in the Bay Area.
EM-6.2	Support and encourage commercial uses to adopt environmentally friendly technologies and reduce the release of pollutants.
EM-6.3	Support the reduction of emissions of particulates from wood burning appliances, construction activity, automobiles, trucks and other sources.
EM-6.4	Implement Bay Area Air Quality Management District (BAAQMD) guidelines that establish minimum screening or buffer distances between emissions sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements, but can be determined compatible with adjacent uses through a project-specific study that determines potential health risk. Mitigation measures shall be required to reduce these risks to acceptable levels.
EM-6.5	Consider potential impacts from land uses that may emit pollution and/or odors when locating air pollution sources near sensitive receptors. Air pollution sources could include freeways, industrial uses, hazardous materials storage, waste disposal/transfer stations and other similar uses.
EM-6.6	BAAQMD recommended measures to reduce PM_{10} and exhaust emissions associated with construction shall be applied to new development in San Carlos.
LU-9.5	Require buffering, screening, transitional standards, or other measures for new and expanded multi-family residential, mixed use, and/or commercial/industrial developments adjacent to single-family residential neighborhoods to minimize impacts and compatibility conflicts.

[25] Bay Area Air Quality Management District. *Final 2017 Clean Air Plan.* April 19, 2017. Page 12.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to air quality as follows:

- Chapter 8.06, Smoking Control, restricts and regulates smoking in public places in order to protect the public health and welfare against the proven health hazards and harmful effects of secondhand smoke.
- Chapter 8.08, Recycling and Diversion of Construction and Demolition Debris, requires the recycling of construction and demolition debris to help the City reduce landfill waste, foster resource conservation, and help the City meet and exceed a diversion rate of 50 percent per AB 939.
- Chapter 8.60, Mandatory Organic Waste Disposal Reduction, list requirements for organic waste generators, in compliance with state recycling laws, state organic recycling laws, and Short-Lived Climate Pollutant Reduction Act of 2016.
- Chapter 18.18, Landscaping, preserves, maintains, and provides regulations of trees for the health and welfare of the City; provide habitat; counteract the pollutants in the air; and maintain the climatic balance.
- Chapter 18.21, Performance Standards, establishes permissible limits and permits objective measurement of nuisance, hazards, and objectionable conditions to ensure protection of the community. Section 18.21.090, Air Contaminants, specify that sources of air pollution shall comply with all rules established by the Environmental Protection Agency (Code of Federal Regulations, Title 40), CARB, and the Air District.
- Chapter 18.25, Transportation Demand Management, aims to reduce the amount of traffic generated by new development and promotion of more efficient utilization of existing transportation facilities.

City of San Carlos 2021 Climate Mitigation and Adaptation Plan

Adopted in September 2021, the City of San Carlos 2021 Climate Mitigation and Adaptation Plan (CMAP) is a comprehensive strategy to reduce GHG emissions and streamline the environmental review of GHG emissions of future development projects in the City. This CMAP is an update of the 2009 Climate Action Plan, providing updated information, an expanded set of GHG reduction strategies, climate adaptation strategies, and a planning horizon out to 2050.

The CMAP allows City decision-makers, staff, and the community to understand the sources and magnitude of local GHG emissions and identifies future strategies that, if implemented, will allow the community to achieve its emissions-reductions targets. In conjunction with existing local and state programs, these CMAP strategies provide a flexible path to reduce the community's annual GHG emissions to 107,920 MTCO2e by 2030 (49 percent below 2005 levels) and 36,060 MTCO2e by 2050 (83 percent below 2005 levels). The City's GHG reduction targets are to reduce emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050, at a minimum. To

ensure that the implementation process is efficient, the CMAP includes a work plan that identifies responsible departments, partners, time frames, and relative costs associated with each strategy.

3.3.1.3 *Existing Conditions*

The San Francisco Bay Area (Bay Area) Air Basin is designated a nonattainment area for the federal O_3 and $PM_{2.5}$ standards and for the state O_3, PM_{10}, and $PM_{2.5}$ standards.[26] The Bay Area is designated as an attainment area for both the NAAQS and CAAQS for CO, SO_2, and NO_2. As the regional air district, the Bay Area Air District is responsible for attaining the NAAQS and CAAQS for these pollutants. As part of an effort to attain and maintain ambient air quality standards for O_3, PM_{10}, and $PM_{2.5}$, the Bay Area Air District has established thresholds of significance for these air pollutants and their precursors that apply to both construction period and operational period impacts. Controlling the emissions of these precursor pollutants is the focus of the Bay Area Air District attempts to reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys where temperatures are higher, there is less wind circulation, and sources of the precursor pollutants (i.e., ROG and NO_x) are prominent. In the Bay Area, most particulate matter is generated from the following activities: combustion, factories, construction, grading, demolition, agriculture, and motor vehicles. Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

The nearest sensitive receptors to the Plan are located in the single-family homes adjacent to the south of the Plan. There are additional sensitive receptors located to the west and northwest of the Plan area.

3.3.2 Impact Discussion

For the purpose of determining the significance of the project's impact on air quality, would the project:

1) Conflict with or obstruct implementation of the applicable air quality plan?
2) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
3) Expose sensitive receptors to substantial pollutant concentrations?
4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

3.3.2.1 *Thresholds of Significance*

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and

[26] Bay Area Air District. "Air Quality Standards and Attainment Status." Last Updated January 5, 2017. https://www.sf.gov/sites/default/files/2024-02/7_BAAQMD_2017_AQStandardsandAttainmentStatus.pdf

must be based to the extent possible on scientific and factual data. The City of San Carlos has considered the air quality thresholds updated by the Bay Area Air District in April 2023 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$.

The applicable Bay Area Air District CEQA thresholds for a plan-level document are summarized in Table 3.3-2. There are no construction thresholds for a program-level document since construction activity and intensity are determined on a project-by-project basis.

Table 3.3-2: Bay Area Air District Plan-Level Air Quality Significance Thresholds

Impact	Threshold of Significance
Criteria Air Pollutant and Precursor Emissions	1. Consistency with Current Air Quality Plan control measures, and 2. Projected vehicle miles traveled (VMT) or vehicle trip increase is less than or equal to projected population increase
Health Risks	Land use diagram identifies special overlay zones around existing and planned sources of TACs and $PM_{2.5}$, including special overlay zones of at least 500 feet (or Air District-approved modeled distance) on each side of all freeways and high-volume roadways, and plan identifies goals, policies, and objectives to minimize potentially adverse impacts. For this analysis – overlay zones are based on potential for sources to result in the following impacts: 1. Excess cancer risk >10.0 chances per million 2. Annual $PM_{2.5}$ Concentration > 0.3 $\mu g/m_3$* 3. Hazard Index >1.0
Odors	Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors
* A concentration of 1 µg/m3 means that one cubic meter of air contains one microgram (10-6 grams) of pollutant.	

For informational purposes only, the Bay Area Air District project-level thresholds that would be applied to future individual projects are shown in Table 3.3-3. Table 3.3-4 below lists the Bay Area Air District health risk and hazards thresholds for single-source and cumulative-sources.

Table 3.3-3: Bay Area Air District Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG and NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 parts per million (ppm) (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	

* The Air District recommends for construction projects that require less than 1 year to complete, lead agencies should annualize impacts over the scope of actual days that peak impacts would occur rather than over the full year. Additionally, for phased projects that results in concurrent construction and operational emissions. Construction-related exhaust emissions should be combined with operational emissions for all phases where construction and operations overlap.

Source: Bay Area Air District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

Table 3.3-4: Bay Area Air District Health Risks and Hazards Thresholds

Health Risk	Single Source	Combined Cumulative Sources
Cancer Risk	10 per one million	100 per one million
Non-Cancer Hazard Index	1.0	10.0
Annual $PM_{2.5}$ Concentration	0.3 µg/m^3	0.8 µg/m^3 (average)

Notes: µg/m^3 = micrograms per cubic meter

Thresholds are applicable to construction and operational activities.

Source: Bay Area Air District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

3.3.2.2 *Project Impacts*

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Plan-Level Consistency

The Bay Area Air District thresholds of significance are:

- Consistency with Current Air Quality Plan control measures, and
- Projected VMT or vehicle trip increase is less than or equal to projected population increase.

Consistency with 2017 CAP Control Measures

Table 3.3-5 lists relevant CAP policies and indicates consistency with the policies.

Table 3.3-5: 2017 Clean Air Plan Control Measures

Control Measures	Project Consistency with Measure Intent
Transportation Measures	
TR1 – Clean Air Teleworking Initiative: Develop teleworking best practices for employers and develop additional strategies to promote telecommuting. Promote teleworking on Spare the Air Days**.**	As described in Section 2.3.6 of this EIR, all new development in the Plan would be subject to TDM requirements, with the exception of 100 percent affordable housing developments, housing developments below 25 units, and non-residential developments below 10,000 square feet. Consistent with the City/County Association of Governments of San Mateo County (C/CAG's) TDM Policy, it is assumed that all new development, with the above noted exceptions, would achieve a 25 percent vehicle trip reduction. Therefore, the Plan would be consistent with this measure.
TR2 – Trip Reduction Programs: Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	
TR 5: Transit Efficiency and Use: Improve transit efficiency and make transit more convenient for riders through continued operation of 511 Transit, full implementation of Clipper fare payment system and the Transit Hub Signage Program.	Portions of the Plan are located within 0.5 mile of a major transit stop (San Carlos and Belmont Caltrain stations) and is entirely within a TPA. There is no direct transit service within the Plan area; however, the Plan would facilitate improvements to the bicycle and pedestrian network. These improvements would encourage connections to nearby rail and bus transit. Therefore, the Plan would be consistent with this measure.
TR8 – Ridesharing, Last-Mile Connection: Promote carpooling and vanpooling by providing funding to continue regional and local ridesharing programs, and support the expansion of carsharing programs. Provide incentive funding for pilot projects to evaluate the feasibility and cost-effectiveness of innovative ridesharing and other last-mile solution trip reduction strategies. Encourage employers to promote ridesharing and carsharing to their employees.	The purpose of 2017 CAP control measure TR8 is to reduce vehicle trips. As discussed in Section 2.3.6, future development within the Plan, with noted exceptions, would be required to prepare TDM plans with measures (such as carpooling and vanpooling) that would achieve a 25 percent reduction in vehicle trips. Therefore, the Plan would be consistent with this measure.

Control Measures	Project Consistency with Measure Intent
TR9 – Bicycle and Pedestrian Access and Facilities: Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	The Plan would be consistent with the Bicycle and Pedestrian Master Plan. As summarized above in Table 2.3-3 and shown in Figure 2.3-12, the Plan would include pedestrian and bicycle improvements to create opportunities for a variety of travel options. Industrial Road, Old County Road, and Taylor Way would have two-way protected bike lanes. The Plan includes three pedestrian paseos, one along the new north-south street connecting Bragato Road to Quarry Road, and two along Bragato Road to facilitate more connectivity and accessibility in the district. A proposed trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features. Therefore, the Plan would be consistent with this measure.
TR13 – Parking Policies: Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing in high-traffic areas.	As described in Section 2.3.3 of this EIR, all new development in the Plan would be compliance with the MTC TOC policy, which does not allow for minimum parking requirements. The Plan would utilize maximum parking requirements, as summarized in Table 2.4-4. Therefore, the Plan would be consistent with this measure.
Energy Measures	
EN2 – Decrease Electricity Demand: Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	All new development facilitated by the Plan would be required to demonstrate compliance with the California Building Energy Efficiency Standards and CALGreen standards in effect at the time the individual development applications are submitted and can therefore be expected to be more energy-efficient than the use being replaced, resulting in reductions in building electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. Therefore, the Plan would be consistent with this measure.
Building Measures	
BL1 – Green Buildings: Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the California Green Building Standards Code (CALGreen; Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with	The purpose of 2017 CAP control measure BL1 is to reduce GHG emissions associated with energy consumption by buildings. As discussed above, future development would reduce electricity demand through compliance with CALGreen and building design. As documented in Section 3.6 Energy under checklist question a), buildout of the Plan would result in a net increase in natural gas consumption. While the City currently has a reach code requiring all-electric building designs for most new projects (SCMC

Control Measures	Project Consistency with Measure Intent
Association of Bay Area Governments (ABAG's) BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	Section 4.106.5), federal law preempts a local jurisdiction from banning the use of natural gas, and it cannot be guaranteed that every individual development project facilitated by the proposed project would be subject to this requirement to be all-electric. All future development would be required to demonstrate compliance with the current California Building Energy Efficiency Standards and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption compared to existing buildings on sites within the Plan area that would undergo redevelopment. Therefore, the Plan would be consistent with this measure.
BL2 – Decarbonize Buildings: Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	As documented in Section 3.6 Energy under checklist question a), buildout of the Plan would result in a net increase in natural gas consumption. While the City currently has a reach code requiring all-electric building designs for most new projects (SCMC Section 4.106.5), federal law preempts a local jurisdiction from banning the use of natural gas, and it cannot be guaranteed that every individual development project facilitated by the proposed project would be subject to this requirement to be all-electric. All future development would be required to demonstrate compliance with the current California Building Energy Efficiency Standards and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption compared to existing buildings on sites within the Plan area that would undergo redevelopment. Therefore, the Plan would be consistent with this measure.
BL4 – Urban Heat Island Mitigation: Develop and urge adoption of a model ordinance for "cool parking" that promotes the use of cool surface treatments for new parking facilities, as well existing surface lots undergoing resurfacing. Develop and promote adoption of model building code requirements for new construction or reroofing/roofing upgrades for commercial and residential multi-family housing.	All new developments accommodated under the Plan would be built to comply with the latest Building Energy Efficiency Standards and CALGreen standards. Therefore, the Plan would be consistent with this measure.
Natural and Working Lands Measures	
NW2 – Urban Tree Planting: Develop or identify an existing model municipal tree planting ordinance and encourage local governments to adopt such an ordinance. Include tree planting recommendations,	All future development would be required to adhere to Section 18.18.070 of the SCMC, which defines significant, protected, and heritage trees and sets forth protection requirements. As discussed in Section 2.3.5 of this EIR, the Plan would require 15 percent open space dedication for all new development

Control Measures	Project Consistency with Measure Intent
BAAQMD's technical guidance, best management practices for local plans, and CEQA review.	greater than one acre. Further, all new residential development would be required to comply with SCMC Section 17.32.030 and provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere. Therefore, the Plan would be consistent with this measure.
Waste Management Measures	
WA4 – Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	All new developments under the Plan would be required to comply with CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multifamily residential land uses. Therefore, the Plan would be consistent with this measure.
Water Measures	
WR2 – Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Section 18.18.080 Water efficient landscaping and irrigation of the SCMC requires that landscaping be designed and plantings selected so that water use is minimized. The estimated total water use of the proposed landscaping on a site must not exceed the maximum applied water allowance. Chapter 8.60.120, Model Water Efficient Landscaping Ordinance Requirements, describes the MWELO requirements for anyone requiring a building or planning permit, plan check, or landscape design review for new construction with a landscape area greater than 500 square feet or rehabilitated existing landscape with a total landscape area greater than 2,500 square feet. Therefore, the Plan would be consistent with this measure.

As documented in Table 3.3-5, future development under the Plan would comply with all applicable 2017 CAP control measures. Therefore, the Plan would not conflict with or obstruct the implementation of an applicable air quality plan.

Projected VMT or Vehicle Trip Increase Compared to Population Increase

Pursuant to the plan-level thresholds of significance for criteria air pollutant emissions and their precursors shown in Table 3.3-2, plans that would increase VMT at a rate that would exceed the rate of population increase, are considered to have a significant and unavoidable criteria air pollutant emissions impact. Table 3.3-6 below compares the increase in service population with the

increase in daily trips (which are one of two factors in VMT, the other being average trip length) associated with buildout of the Plan.

Table 3.3-6: Daily Trip and Population Increase Comparison

Scenario	Service Population (Employees)	Service Population (Residents)	Daily Trips
Existing Conditions	6,933	0	19,001
Plan	10,356	3,611	40,942[1]
Existing to be Removed	(562)	0	(2,282)
Existing + Plan	16,727	3,611	57,661
Rate of Increase over Existing (Percentage)	193 (employees + residents)		203

Source: Nelson\Nygaard Consulting Associates. *Northeast Area Specific Plan (NEASP) – Transportation Analysis (FINAL). December 2024.*

Notes:

[1] The daily trips generated by the Plan assumes a 25 percent trip reduction applied per the TDM requirement.

As shown in Table 3.3-6, the number of daily trips in the Plan would increase by 203 percent whereas the population (employees plus residents) would increase by 193 percent. The rate of traffic growth would increase at a rate that would exceed the rate of population increase.

Impact AIR-1: Buildout of the Plan would increase daily trips by 203 percent, and increase the service population by 193 percent. Since the rate of increase in population would be exceeded by the rate of increase in daily trips, the Plan would have a significant program-level criteria air pollutant emissions impact.

General Plan Policies to Reduce Criteria Air Pollutant Emissions

The following General Plan goals and policies would serve to minimize potential adverse impacts related to these long-term, regional criteria air pollutant emissions:

- Policy CSH-2.3: Access to public transportation facilities should be convenient and designed to encourage use of public transit.
- Policy CSH-3.3: Support the incorporation of Transportation Demand Measures in new development to reduce traffic impacts.
- Policy CSH-6.2: Support transit-oriented development with mixed, dense land use that reduces the need to travel and that is linked to good transit. The City shall work with local, regional and State representatives to encourage the support and funding of transit oriented development projects

- Policy EM-11.4: Provide an integrated network of bicycle and pedestrian thoroughfares that connects jobs and housing to other city destinations, as recommended in the San Carlos Bicycle and Pedestrian Master Plan.
- Policy EM-11.6: Encourage employers to incentivize employee use of mass transit and alternative modes of transportation.
- Policy EM-11.9: Coordinate with major employers, neighboring municipalities, transit agencies and providers to enhance regional transit and shuttle service.
- Policy EM-11.10: Evaluate and encourage new forms of mass transit.
- Policy EM-11.11: Amend the Zoning Ordinance to create a Transportation Demand Management (TDM) Ordinance that contains strategies to reduce vehicle trips.
- Policy EM-11.12: Include in the Transportation Demand Management Ordinance a requirement that new office development over a certain size include showers and safe and secure bike racks to encourage employees to bicycle to work.

As discussed in Section 3.17 Transportation, the Plan is located in a TPA and therefore, future development projects would result in a less than significant VMT impact. Therefore, the project would not contribute to a significant cumulative VMT impact. Further, as described in Section 2.3.7 of this EIR, all new development in the Plan, with noted exceptions for 100 percent affordable housing, small housing developments, and small non-residential developments, would be subject to TDM requirements. Consistent with C/CAG's TDM Policy, it is assumed that all new development, with noted exceptions, would achieve a minimum 25 percent vehicle trip reduction (this reduction is assumed in the 203 percent rate of trip growth disclosed above). However, large projects would be expected to achieve up to a 35 percent vehicle trip reduction. While the Plan includes measures to reduce trips, the Plan's rate of traffic growth (assuming the minimum 25 percent trip reduction) would increase at a rate that would exceed the rate of population increase. Given the programmatic nature of the Plan, there is no mitigation that would reduce this impact. Accordingly, buildout of the Plan would conflict with the 2017 Clean Air Plan.

Project-Level Consistency

The Bay Area Air District project-level thresholds that would be applied to future individual projects are shown in Table 3.3-3.

Construction Criteria Pollutant Emissions

Buildout of the Plan, which would occur over a span of 20 years, would consist of numerous construction projects that would occur at various times. Construction of future development under the Plan would result in temporary emissions from construction activities associated with subsequent development, including demolition, site grading, asphalt paving, building construction, and architectural coating. Emissions commonly associated with construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, and worker commute trips.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site deposit mud on local streets, which is an additional source of airborne dust after it dries. The Bay Area Air District recommends all projects include a "basic" set of best management practices (BMPs) to manage fugitive dust and considers impacts from dust (i.e., fugitive PM_{10} and $PM_{2.5}$) to be less-than-significant if BMPs are implemented to reduce these emissions (refer to discussion under Fugitive Dust in checklist question c).

Construction exhaust emissions include those from equipment (i.e., off-road) and traffic (on-road vehicles and trucks). Off-road construction equipment is often diesel-powered and can be a substantial source of NO_X emissions, in addition to PM_{10} and $PM_{2.5}$ emissions. Architectural coatings and application of asphalt pavement are dominant sources of ROG emissions. Unless controlled, the combination of temporary dust from activities and diesel exhaust from construction equipment and related traffic may pose a nuisance impact to nearby receptors or exceed acceptable levels for projects. In addition, NO_X emissions during grading and soil import/export for large projects may exceed the Bay Area Air District NO_X emission thresholds for projects (refer to Table 3.3-3).

Impact AIR-2: Future construction under the Plan, if uncontrolled, could result in temporary dust and diesel exhaust impact to nearby receptors or exceed acceptable levels for projects. In addition, NOx emissions during grading and soil import/export for large projects may exceed the Bay Area Air District NOx emission thresholds for projects.

The 2045 General Plan Reset EIR concluded that development projects would generate emissions that would have the potential to exceed the Bay Area Air District significance thresholds. Therefore, the 2045 General Plan Reset EIR requires the following mitigation measure for all future development.

General Plan Mitigation Measures

- **Mitigation Measure AQ-2.1:** Prior to discretionary approval by the City for development projects subject to CEQA (California Environmental Quality Act) review (i.e., discretionary, nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with current BAAQMD methodology for assessing air quality impacts identified in BAAQMD's CEQA Air Quality Guidelines. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD-adopted thresholds of significance, the City shall require feasible mitigation measures to reduce air quality emissions. Measures shall require implementation of current BAAQMD Best Management Practices for construction-related fugitive dust emissions.

Given specific construction details are not available at this time, future projects in the Plan would be required to complete supplemental environmental review with a construction criteria pollutant emissions analysis to identify impacts and include measures to reduce emissions below the applicable Bay Area Air District construction thresholds. Reductions in emissions can be accomplished through, though is not limited to, the following measures:

- Construction equipment selection for low emissions (e.g., U.S. EPA Tier 4 standards);
- Use of alternative fuels, engine retrofits, and added exhaust devices;
- Low-VOC paints;
- Modify construction schedule; and
- Implementation of Bay Area Air District Enhanced Construction Mitigation Measures for control of fugitive dust.

As noted in the 2045 General Plan Reset EIR, while implementation of Mitigation Measure AQ-2.1 has the potential to reduce construction emissions, potential future development projects (individually or cumulatively) could still exceed the Bay Area Air District significance thresholds for construction. Projects that would exceed the applicable thresholds even after implementation of AQ-2.1 would be required to prepare a Supplemental EIR to disclose this significant and unavoidable impact.

Operational Period Emissions

Operational air emissions from the project would be generated primarily from autos driven by future residents and employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical ROG emissions from these types of land uses. CalEEMod was used to estimate net operational emissions from implementation of the Plan assuming full buildout in 2045 or later. Table 3.3-7 reports the predicted emissions from complete buildout of the Plan in terms of annual emissions in tons and average daily operational emissions, assuming 365 days of operation per year. Net emissions between the Plan and existing uses are also shown.

Table 3.3-7: Operational Period Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
Existing Annual Emissions in 2024 (tons/year)[1]	22.88	13.22	9.16	2.75
Existing Land Uses Annual Emissions in 2045 (tons/year)	20.31	9.29	9.10	2.69
Future Proposed Annual Emissions in 2045 (tons/year)	45.35	13.82	15.95	4.55
Existing to Be Removed in 2045 (tons/year)	3.05	1.29	1.22	0.36

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
Plan (Existing + Project – Existing to Be Removed) Annual Emissions in 2045 (tons/year)	62.61	21.82	23.83	6.88 t
Net Increase Over Existing (tons/year)	**42.30**	**12.53**	14.73	4.19
Bay Area Air District Project-Level Thresholds (tons per year)	10	10	15	10
Average Daily Net Project Operational Emissions (pounds per day)[1]	**231.8**	**68.7**	80.7	23.0
Bay Area Air District Project-Level Thresholds (pounds per day)	54	54	82	54

[1] Assumes 365-day operation.

As shown in Table 3.3-7, annual and average daily emissions of ROG and NOx associated with operation of the Plan Area would exceed the Bay Area Air District project-level significance thresholds.

Impact AIR-3: Buildout of the Plan would result in annual and average daily emissions of ROG and NOx associated with operation of the Plan Area would exceed the Bay Area Air District project-level significance thresholds.

The 2045 General Plan Reset EIR concluded that implementation of Mitigation Measure AQ-2.2 would reduce air pollutant emissions to the extent practicable. However, due to the programmatic nature of the General Plan Reset EIR, the impact was found to be significant and unavoidable.

General Plan Mitigation Measures

- **Mitigation Measure AQ-2.2:** Prior to discretionary approval by the City for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operational air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with Air District methodology in assessing air quality impacts identified in the Air District's current *CEQA Air Quality Guidelines* at the time that the project is considered.

  If operation-related air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require the project applicant(s) to incorporate mitigation measures to reduce air pollutant emissions to comply with applicable significance threshold standards during operational activities. The identified measures shall be included as part of the conditions of approval or a mitigation monitoring and reporting

plan adopted for the project as part of the project CEQA review. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- Implementing commute trip reduction programs.
- Unbundling residential parking costs from property costs.
- Expanding bikeway networks.
- Expanding transit network coverage or hours.
- Using cleaner-fueled vehicles.
- Exceeding the current Title 24 Building Envelope Energy Efficiency Standards.
- Establishing on-site renewable energy generation systems.
- Requiring all-electric buildings.
- Replacing gas-powered landscaping equipment with zero-emission alternatives.
- Implementing organics diversion programs.
- Expanding urban tree planting.

Future development projects under the Plan would be required to prepare and submit a technical assessment evaluating potential operational air quality impacts to the City for review and approval, consistent with General Plan Mitigation Measure AQ-2.2. Further, the Bay Area Air District CEQA Air Quality Guidelines provide project screening criteria and level sizes to determine if projects warrant modeling to evaluate their emissions. Projects that meet the screening criteria and are smaller than the screening sizes would be considered to have less-than-significant operational air pollutant emissions. Projects that are larger than the screening sizes would undergo further analysis to determine if emissions exceed the project-level thresholds as required by General Plan Mitigation Measure AQ-2.2. As discussed in Section 1.1 of this EIR, the EIR will allow for streamlined environmental review of subsequent development projects consistent with the Plan and analysis in this EIR.

As described above, the Plan is consistent with the applicable 2017 CAP control measures. However, the Plan would increase trips (and, therefore, VMT) at a rate that would exceed the rate of population increase and is therefore considered to have a significant and unavoidable criteria air pollutant emissions impact. Future development under would implement General Plan Mitigation Measure AQ-2.1 and AQ-2.2 to reduce construction and operational criteria pollutant emissions. Nonetheless, the project would conflict with and obstruct implementation of the 2017 CAP. **(Significant and Unavoidable Impact with Mitigation Incorporated)**

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

As stated in the Bay Area Air District CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size to, by itself, result in non-attainment of ambient air quality standards. If a project exceeds the identified significance

thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As discussed in Section 3.3.1.2, the Bay Area is considered a non-attainment area for ground-level O_3, $PM_{2.5}$, and PM_{10} under the state and/or federal standards. High O_3 levels are caused by cumulative emissions of ROG and NO_X. Controlling the emissions of these precursor pollutants would reduce O_3 levels. As part of an effort to attain and maintain ambient air quality standards, the Bay Area Air District has established thresholds of significance for these air pollutants and their precursors. Pursuant to the plan-level thresholds of significance for criteria air pollutant emissions and their precursors shown in Table 3.3-2, plans that are 1) inconsistent with the control measures provided in the 2017 CAP, or 2) would increase VMT or daily trips at a rate that would exceed the rate of population increase, are considered to have a significant and unavoidable criteria air pollutant emissions impact.

As documented under checklist question a), the Plan would be consistent with the 2017 CAP control measures. However, as shown in Table 3.3-6, the increase in daily trips, which corresponds to an increase in VMT, would exceed the increase in population. Accordingly, it is concluded that buildout of the Plan would result in a cumulatively considerable criteria pollutant emissions impact.

At a project level, future development under the Plan would implement General Plan Mitigation Measure AQ-2.1, which would require supplemental environmental review with a construction criteria pollutant emissions analysis to identify impacts and include measures to reduce emissions below the applicable Bay Area Air District construction thresholds. Future development projects under the Plan would be required to prepare and submit a technical assessment evaluating potential operational air quality impacts to the City for review and approval, consistent with General Plan Mitigation Measure AQ-2.2. As discussed above and stated in Section 1.1, the EIR will allow for streamlined environmental review of subsequent development projects consistent with the Plan and analysis in this EIR.

As summarized above, the implementation of the Plan would generate substantial operational criteria pollutants and is considered to have a significant and unavoidable criteria air pollutant emissions impact. **(Significant and Unavoidable Impact with Mitigation Incorporated)**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Fugitive Dust

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. Consistent with General Plan Policy EM-6.6, future development

projects would implement the following Bay Area Air District best management practices to reduce fugitive dust impacts to less than significant.

Bay Area Air District Best Management Practices:

- 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 miles per hour (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 five 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 the 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 Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Community Health Risk

Impacts related to increased health risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the Plan Area vicinity or by significantly exacerbating existing cumulative TAC impacts. The buildout of the Plan would introduce new temporary sources of TACs during construction (i.e., on-site construction and truck hauling emissions) as individual projects are constructed over the 20-year buildout of the Plan and long-term sources of TACs during operation (i.e., mobile and stationary sources).

Construction Health Risks

There are sensitive receptors within 1,000 feet of the Plan, with residences immediately south of the Plan area. Future construction activity under the Plan would generate dust and equipment exhaust that would affect nearby sensitive receptors. In addition, the Plan would place sensitive receptors within the Plan area. Traffic generated by the Plan would consist of mostly light-duty gasoline-powered vehicles and the Plan may introduce new stationary sources such as emergency diesel-powered generators, which would produce TAC and air pollutant emissions in the area.

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. The construction exhaust emissions may pose health risks for sensitive receptors such as nearby residents. The primary health risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. Since specific construction plans and schedules for construction are not known, it is not possible at this stage of the planning process to quantify the impacts and determine the significance. Consistent with General Plan policy EM-6.4, future development projects would be required to prepare a project-specific study that determines potential health risk impacts and identified mitigation measures to reduce impacts to acceptable levels.

- **EM-6.4:** Implement Bay Area Air Quality Management District (BAAQMD) guidelines that establish minimum screening or buffer distances between emissions sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements, but can be determined compatible with adjacent uses through a project-specific study that determines potential health risk. Mitigation measures shall be required to reduce these risks to acceptable levels.

Reductions in emissions can be accomplished through, though is not limited to, the following measures:

- Construction equipment selection for low emissions (e.g., U.S. EPA Tier 4 standards);
- Use of alternative fuels, engine retrofits, and added exhaust devices;
- Low-VOC paints;
- Modify construction schedule; and
- Implementation of Bay Area Air District Enhanced Construction Mitigation Measures for control of fugitive dust.

Implementation of General Plan Policy EM-6.5 would ensure that a health risk assessment is conducted at a project level for future development projects. If a future development project were to exceed applicable thresholds, General Plan Policy EM-6.5 requires that mitigation be incorporated to reduce to health risks to acceptable levels.

Operational Health Risks

Stationary Sources

Future development under the Plan would inevitably include stationary equipment such as backup power generators powered by diesel engines. Operation of diesel generators would be a source of TAC emissions in the form of DPM. These diesel engines would be subject to CARB's Stationary Diesel Airborne Toxics Control Measure (ATCM) and require permits from the Bay Area Air District, since they would be equipped with engines larger than 50-HP. As part of the Bay Area Air District permit requirements for toxics screening analysis, the engine emissions would have to meet Best Available Control Technology for Toxics (BACT) and pass the toxic risk screening level of less than ten in a million. A risk assessment would be prepared by the Bay Area Air District as part of the

permitting process for stationary equipment. Depending on results, the Bay Area Air District would set limits for DPM emissions (e.g., more restricted engine operation periods). Sources of air pollutant emissions complying with all applicable Bay Area Air District regulations generally would not be considered to have a significant air quality health risk impact on their own.

Traffic

TAC emissions from traffic are anticipated to decrease with the implementation of the Plan for the following reasons:

- Vehicles, especially heavy-duty trucks, that meet newer diesel emissions standards will replace older vehicles ;
- Overall increase in fuel efficiency of automobiles and trucks; and
- An increase in the percentage of vehicles that have zero emissions.

In addition to the reasons mentioned above, all new development under the Plan would be subject to TDM requirements (refer to Section 2.4.6). As discussed above, with noted exceptions, future development would achieve a minimum 25 percent vehicle trip reduction (with some larger projects achieving up to a 35 percent reduction). Nonetheless localized increases in traffic emissions of TACs may occur as the Plan is built out. These increases would likely be dependent on the specific types and sizes of land uses and the amount of truck traffic generated. Projects in the Production and Innovation and Industrial Professional zoning districts that include warehouses or distribution centers could have impacts with respect to health risks, depending on proximity of receptors.

CO Hotspots

CO hotspots (occurrences of localized high CO concentrations) could occur near busy congested intersections. Recognizing the relatively low CO concentrations experienced in the Bay Area, the Bay Area Air District's CEQA Air Quality Guidelines state that a project would have a less-than-significant impact if it would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. Peak hour traffic volumes at intersections affected by implementation of the Plan area would be less than 10,000 vehicle trips per hour. Therefore, this impact would be less-than-significant.

Combined Risks from Construction and Operation

Sources of TACs or $PM_{2.5}$ emissions associated with buildout of planned development in the Plan Area have not been identified. The mix of land uses envisioned under the Plan could include sources such that significant exposures might occur. The impacts may be caused by a combination of construction activity, truck traffic, diesel-powered emergency generators, etc.

Impact AIR-4: Implementation of the Plan could result in uses that would result in significant exposures of TACs and $PM_{2.5}$.

Health Risk Project Requirements

- **Health Risk Assessments.** Applicants proposing development of projects within 1,000 feet of existing sensitive receptors or worker receptors as defined by the Bay Area Air District (e.g., residential, schools) shall prepare a site-specific construction and operational health risk assessment (HRA) prior to project approval. If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than Bay Area Air District project-level thresholds, then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed the Bay Area Air District project level thresholds, additional feasible on- and off-site mitigation shall be analyzed to further reduce risks to the greatest extent practicable.

Implementation of General Plan Mitigation Measure A1-2.1, General Plan Policy EM-6.4 and Policy EM-6.6, and the above proposed Specific Plan Project Requirement, future development under the plan would reduce on-site diesel exhaust emissions and construction-related fugitive dust emissions. The application of appropriate measures would reduce maximum cancer risk, annual $PM_{2.5}$ concentrations, and HI to below respective threshold levels.

Health Risks from Criteria Pollutant Emissions

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute a cumulatively considerable contribution to a significant cumulative regional criteria pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. As stated in the 2017 Bay Area Air District CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In developing thresholds of significance for air pollutants, the Bay Area Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect.

As discussed under checklist question b), the Bay Area is considered a non-attainment area for ground-level O_3, $PM_{2.5}$, and PM_{10} under the state and/or federal standards. The increase in emissions of these pollutants associated with buildout of the Plan will result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable ambient air quality standard. Because the Plan would increase the rate of traffic growth in excess of the rate of population growth and have emissions of ROG and NOx that would exceed emission-based significance thresholds, the Plan could result in a cumulatively considerable net increase in pollutant emissions that contribute to elevated ozone and PM_{10} concentrations that exceed ambient air quality standards.

Ozone is a powerful oxidant that is harmful to public health at high concentrations. Ozone, at high levels, can damage the tissues of the lungs and respiratory tract. High concentrations of ozone irritate the nose, throat, and respiratory system and constrict the airways. Ozone also can aggravate other respiratory conditions such as asthma, bronchitis, and emphysema, causing increased hospital admissions. Repeated exposure to high ozone levels can make people more susceptible to respiratory infection and lung inflammation and permanently damage lung tissue. Ozone can also have negative cardiovascular impacts, including chronic hardening of the arteries and acute triggering of heart attacks. Children are most at risk, as they tend to be active and outdoors in the summer, when ozone levels are highest. Seniors and people with respiratory illnesses are also especially sensitive to ozone's effects. Even healthy adults, working or exercising outdoors during high ozone levels, can be affected. Ozone is not emitted directly from pollution sources. Instead, ozone is formed in the atmosphere through complex chemical reactions in the presence of sunlight between two types of precursor chemicals: hydrocarbons, often referred to as ROG and NOx. As air temperatures rise, the formation of ground level ozone increases at an accelerated pace. Ozone levels are usually highest on clear, hot, windless summer afternoons, especially in inland valleys that are downwind of pollution sources.

Ozone is a regional pollutant. Emissions of ROG and NOx throughout the Bay Area contribute to ozone formation. Because emissions in one part of the region can impact air quality miles downwind, efforts to reduce ozone levels focus on reducing emissions of ROG and NOx throughout the region. The relationship between ROG and NOx in ozone formation is complex; the ratio between the precursor pollutants influences how ozone forms. The Bay Area Air District's ozone modeling indicates that the Bay Area is "ROG-limited" for ozone formation. This means that reducing ROG emissions in the Bay Area will be more productive in reducing ozone, at least in the near term. However, modeling also suggests that large reductions in NOx emissions will be needed to achieve the ozone reductions required to attain the current health-based ozone standards. A certain amount of ozone formation occurs naturally, even in the absence of anthropogenic emissions of ROG and NOx.

The emissions from operation of the Plan are compared against regional emissions that lead to elevated concentrations of ozone, PM_{10} and $PM_{2.5}$ in Table 3.3-8 below.

Table 3.3-8: Comparison of Project Emissions to Air Basin Emissions (in tons/day)

Scenario	ROG	NOx
Bay Area Air Basin in 2024	90.28	66.92
Bay Area Air Basin in 2045[1]	92.22	69.03
Unmitigated Project Operation (Increase over existing)	0.12 tons/day (42.3 tons/year)	0.03 tons/day (42.3 tons/year)
% of Basin in 2040	*0.13%*	*0.06%*

[1]CARB emission inventories are only reported out to year 2040, which is the closest year of analysis to proposed Plan operational year

By comparing the Plan's emissions to regional emissions, one gets the sense of the magnitude of the project effects on regional air quality. Plan operational emissions in comparison to regional emissions are a small portion of the regional inventory (i.e., 0.06 to 0.13 percent) that the effect of the entire buildout of the Plan would not cause regional pollutant levels to measurably change. As a result, operation of the Plan would not measurably increase ozone. Therefore, the health effects associated with the project emissions would not be measurable. However, the emissions from the combined projects under the Plan (even assuming mitigation measure AIR-2.1 and 2.2) would increase emissions above the threshold of 54 pounds per average day for ozone precursors (i.e., ROG and NOx), such that the emissions would be cumulatively considerable. **(Significant and Unavoidable Impact with Mitigation Incorporated)**

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The Plan would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors. However, they would be localized and are not likely to adversely affect people off site by resulting in confirmed odor complaints. The Plan does not identify any uses that are typical sources of odors that could lead to objectionable odors that generate frequent odor complaints.

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities. The Bay Area Air District publishes screening buffer distances for odor sources and sensitive receptors in their CEQA Air Quality Guidelines. There are no identified major sources of odors with the Plan area, nor are any proposed as part of the Plan. Uses in the Plan may include restaurants or auto repair shops that could have localized odors but not likely to result in frequent odor complaints. Additionally, General Plan Policy EM-6.5 would ensure that potential odor impacts are addressed if new odor sources were sited near sensitive receptors. The Plan would, therefore, not create objectionable odors that would affect a substantial number of people off-site. **(Less than Significant Impact)**

3.3.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative air quality impact?

The geographic area for cumulative air quality impacts is the San Francisco Bay Area Air Basin. Past, present, and future development projects contribute to the region's adverse air quality impacts. No single project is sufficient in size, by itself, to result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts.

Consistency with the 2017 Clean Air Plan

As discussed under checklist question a), build out of the Plan would conflict with the 2017 Clean Air Plan due to the Plan's increase in daily trips at a rate that would exceed the rate of population increase

Criteria Air Pollutants

In developing thresholds of significance for air pollutants, the Bay Area Air District considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As discussed under checklist questions a) and b), the increase in daily trips would exceed the increase in population as a result of the Plan and, therefore, the Plan would result in a cumulatively considerable net increase of criteria pollutant emissions.

Exposure of Sensitive Receptors

As discussed above under checklist question c), buildout of the Plan would result in a cumulatively considerable net increase in pollutant emissions that contribute to elevated ozone and PM_{10} concentrations that exceed ambient air quality standards.

Odors

As discussed under checklist question d), odors associated with construction would be both temporary and localized, and therefore are not likely to affect people off-site. Uses in the Plan may include restaurants or auto repair shops that could have localized odors but not likely to result in frequent odor complaints. Additionally, General Plan Policy EM-6.5 would ensure that potential odor impacts are addressed if new odor sources were sited near sensitive receptors. For these reasons, the Plan would not result in a cumulative considerable contribution to odor impacts.

Buildout of the Plan would contribute to a significant cumulative impact with respect to air quality. **(Significant and Unavoidable Cumulative Impact)**

3.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included to provide information to the public regarding existing air quality conditions that would affect sensitive receptors in the Plan area.

A screening risk assessment was completed to analyze the impacts of existing TAC sources on new sensitive receptors allowed under the proposed Plan. Details of the modeling and health risk calculations are included in Appendix B.

The Plan would allow for future development of residential land uses and other uses that may contain sensitive receptors in proximity to arterial and collector roadways, highways and stationary sources of TACs. A 1,000-foot buffer was drawn around the Plan area to identify which TAC sources would affect sensitive receptors. Screening levels indicate that Plan sensitive receptors near high-volume roadways (roadways with 10,000 average daily trips or more) and stationary sources could be exposed to levels of TACs and or $PM_{2.5}$ that could cause an unacceptable health risk. Figure 3.3-1 shows the Plan area and all TAC sources identified within the 1,000-foot buffer. Any development of sensitive receptors within affected areas that are near high volume roadways, stationary sources, or Caltrain would potentially expose sensitive receptors to significant exposure of cancer risk and/or $PM_{2.5}$ concentrations.

Toxic Air Contaminant Project Requirements

- Projects developed within the Plan that are affected by air pollutant or toxic air contaminant (TAC) sources shall implement appropriate measures to minimize long-term TAC and annual $PM_{2.5}$ exposure for new project occupants. Projects shall include either measures to reduce long-term exposure to TAC and PM2.5, as described below, or conduct a site-specific analysis prior to project approval to identify the level of exposure to TACs in terms of cancer risk and annual $PM_{2.5}$ concentrations. The analysis shall use procedures prescribed by the Bay Area Air District (e.g., the Bay Area Air District CEQA Air Quality Guidelines) to predict these exposures. Where cancer risk exceeds 10 chances per million from any single source or 100 chances per million for cumulative sources (i.e., within 1,000 feet), where annual $PM_{2.5}$ concentrations exceed 0.3 $\mu g/m^3$ from any single source or 0.8 $\mu g/m^3$ for cumulative sources, and where HI exceed 1.0 from any single source or 10.0 for cumulative sources, the following measures shall be implemented:
    - Design project developments to limit exposure from sources of TACs and fine particulate matter ($PM_{2.5}$) emissions.
    - Install air filtration at units that have predicted cancer risk levels above 10 chances per million and $PM_{2.5}$ concentrations above 0.3 µg/m3. Air filtration devices shall be rated Minimum Efficiency Reporting Value (MERV) 13 or higher. Alternately, at the approval of the City, equivalent control technology may be used if it is shown by a qualified air quality consultant or heating, ventilation, and air conditioning (HVAC) engineer that it would reduce risk below significance thresholds.
    - As part of implementing this measure, an ongoing maintenance plan for the building's HVAC air filtration system shall be required.
    - Ensure that any lease agreements and other property documents (1) require cleaning, maintenance, and monitoring of the affected units for air flow leaks; (2) include assurance that new owners and tenants are provided information on the ventilation system; and (3) include provisions that fees associated with owning or leasing a unit(s) in the building include funds for cleaning, maintenance, monitoring, and replacements of the filters, as needed.
    - Require that, prior to building occupancy, an authorized air pollutant consultant or HVAC engineer submit verification confirming the installation of all necessary

measures to reduce cancer risk below 10 chances per million and $PM_{2.5}$ concentrations below 0.3 $\mu g/m^3$ from any source.



RESIDENTIAL DEVELOPMENT AND 1,000-FOOT INFLUENCE AREA | FIGURE 3.3-1

3.4 Biological Resources

The following discussion is based, in part, on a Biological Resources Report completed by H.T. Harvey & Associates dated May 12, 2025. This report is included as Appendix C to this EIR.

3.4.1 Environmental Setting

3.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control

Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Regional and Local

City of San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating biological resource impacts resulting from planned development within the City including the following:

Policy	Description
EM-1.1	Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications through the preparation of a biological resources assessment by a qualified biologist. Require such biological resource assessments as part of project approval for proposed development on sites that may support special-status plant and animal species, sensitive natural communities, important wildlife corridors, riparian habitat, or regulated wetlands and waters
EM-1.2	Ensure that development is consistent with all federal, State and regional regulations for habitat and species protections.
EM-1.3	Work to manage or eliminate nonnative invasive species from City-owned property and open space.
EM-1.4	Protect and preserve the circadian cycle (the cycle of night and day) by limiting sources of light during nighttime hours.
EM-1.5	Promote the preservation of native species, habitat and vegetation types and overall natural diversity.
Action EM-1.5	Require that new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes.
EM-2.1	Preserve and enhance riparian areas.
EM-2.2	Continue to enforce the City's Riparian Ordinance for all four of the City's creeks (Pulgas, Brittan, Cordilleras and Belmont) and their tributaries.
EM-2.3	Carefully evaluate the cumulative and compounding impacts of incremental creek encroachments.
EM-2.4	Restore culverted or buried channels to their natural state wherever feasible
EM-2.5	Promote the establishment of native vegetation and the removal of non-native invasive plants in riparian areas.

Policy	Description
EM-2.6	Encourage property owners to replace fallen trees along waterways to maintain an upper canopy of vegetation. The species shall be as approved by the City arborist. Encourage use of trees native to the area.
EM-2.7	Retain Pulgas, Brittan, Cordilleras and Belmont Creek channels and their 100-year floodplains wherever possible as natural open space areas. These areas are to function as storm drainage facilities and as open space greenbelts to support natural habitat.
EM-3.1	Maintain and expand the urban canopy with special emphasis on protection of heritage trees.
EM-4.1	Retain existing public open space as open space.
EM-4.2	Support an open space system that is diverse in uses and opportunities and includes natural function/wildlife habitat as well as passive and appropriate active recreation.
PR-4.1	Preserve and protect sensitive species and habitats in City parks and open space, as identified by the Environmental Management Element of this Plan or state and federal guidelines.
PR-4.8	Replant, when necessary, with native species and/or climate-appropriate plants.
LU-1.9	To the extent possible, retain the channels, floodplains, riparian corridors (including suitable setbacks from top of bank) and closely associated upland areas of Cordilleras, Brittan and Pulgas Creeks and their tributaries as significant open space areas. These areas should be maintained in their natural state to function as appropriate open space areas, greenbelt and to support a riparian habitat.
LU-1.11	Preserve existing open space by supporting urban infill.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to biological resources as follows:

- Chapter 18.14, Stream Development and Maintenance (SDM) Overlay District, regulates developments within 25 feet of top of bank of Cordilleras, Belmont, Brittan, and Pulgas Creeks within the City. All new development shall be set back a minimum twenty-five feet from the top of bank line or such other distance as specified by the Planning and Transportation Commission. Vegetation shall not be cut or removed except for normal maintenance, to facilitate drainage, prevent flooding, and to permit adequate flow of water. Such cutting or removal of vegetation shall be limited to the minimum amount necessary, with special care to avoid removal of vegetation immediately adjacent to the banks of the stream.
- Section 18.18.070, Trees, outlines regulations that serve to promote the preservation and development of a healthy, diverse tree canopy in San Carlos. The section defines protected trees, which means any significant or heritage tree, any tree as part of a replacement requirement, an approved development permit or an approved landscaping plan. The provision of trees per square feet of lot coverage varies by district but is required to be a

minimum of 24 inches box size unless otherwise specified by the City Arborist and include species restrictions. The section also regulates the maintenance and preservation and prohibits the removal and/or pruning of protected trees.

3.4.1.2 *Existing Conditions*

The reconnaissance-level survey identified four habitat types/land uses within the Plan area: developed/landscaped (143.2 acres), riparian (1.2 acres), freshwater marsh (0.6 acre), and aquatic riverine (0.4 acre); these habitats are described in detail below and shown on Figure 3.4-1.

Habitats

Developed/Landscaped

Vegetation

The Plan area is developed as an industrial area with aging industrial buildings as well as sidewalks, asphalt parking lots, a hospital, numerous paved roads, and associated ornamental landscape vegetation. The buildings are typically connected via sidewalks lined with ornamental landscaped mature trees such as eucalyptus. The hospital is surrounded by large fields composed entirely of a perennial grass that appears similar to clustered field sedge, which is a commonly planted native turf "grass".

West of Quarry Road and perpendicular to Belmont Creek, a narrow strip of grasses characteristic of common California annual grassland species has established in an area of exposed bedrock in between two parking areas. This area contains nonnative brome grasses, Bermuda buttercup, and fennel, as well as one native coyote brush individual. Because this area is extremely limited in size and encompassed by developed areas, it is mapped as developed/landscaped rather than as a separate biotic habitat.

Wildlife

Wildlife species that are associated with the developed/landscaped habitat in the Plan area are adapted to high levels of human disturbance.

Mammals that occur in this area include introduced species such as the Virginia opossum, Norway rat, black rat and house mouse as well as common native species such as the striped skunk and raccoon. While native California ground squirrels are common in the region, no burrows of this species were observed during the 2023 reconnaissance-level survey. Nonnative eastern gray squirrels are common in the area. A few species of common, urban-adapted reptiles, such as the western fence lizard, are also common.



Source: H.T. Harvey & Associates, March 2025.

BIOTIC HABITATS

FIGURE 3.4-1

A variety of regionally common bird species will nest and forage in trees and landscape vegetation within developed portions of the Plan, including the native Anna's hummingbird, California towhee, bushtit, dark-eyed junco, lesser goldfinch, American robin, northern mockingbird, and American crow as well as the nonnative Eurasian collared dove. Cavities in trees and buildings provide nesting sites for cavity-nesting birds such as the native chestnut-backed chickadee, Bewick's wren, and nonnative European starling.

Eaves and ledges of buildings within the Plan area provide nesting sites for certain bird species that nest and roost on structures, such as the native black phoebe, house finch, and mourning dove, as well as the nonnative rock pigeon and house sparrow.

Raptors, including the red-tailed hawk, red-shouldered hawk, and Cooper's hawk forage for prey within the Plan, and large trees such as eucalyptus and coast redwood provide potential nesting sites for these species. However, foraging resources are limited in the Plan due to the extensive hardscape, and only one to two pairs of raptors would be able to nest in the area at any given time. No raptor nests were observed in the Plan area during the 2023 reconnaissance survey.

Buildings in the Plan, especially those that have not been occupied for long periods of time, provide suitable roosting habitat for common species of bats, such as the California myotis, Mexican free-tailed bat, and big brown bat. No trees with cavities suitable for large bat colonies or crevices suitable for individual roosting bats were observed within the Plan area. Additionally, no evidence of active bat roosts was observed on building exteriors during the January 2023 survey.

Riparian

Vegetation

Riparian habitat is present along Belmont Creek and several drainage channels within the Plan, as shown on Figure 3.4-1. Along the creek, vegetation includes native tree species such as mature arroyo willows and red alder, native California blackberry as well as nonnative Himalayan blackberry and French broom.

Wildlife

Riparian habitats in California generally support diverse animal communities and contribute disproportionately to landscape-level species diversity, relative to surrounding upland habitats. In addition to providing breeding, foraging, and roosting habitat for a diverse array of animals, riparian communities provide movement corridors for some species, connecting a variety of habitats throughout a region. The ecological value of riparian habitats in the Plan is limited considerably by the narrow nature of the riparian corridors, paucity of native riparian habitat, and proximity to urban development and high human-use areas. Nonetheless, the riparian habitat along Belmont creek is of moderate value to wildlife, particularly those species that are tolerant of or associated with the adjacent developed areas. Riparian habitat that is present along the other channels in the Plan, which is much less dense and well-layered, provides relatively low-value habitat for wildlife species.

Urban-adapted mammals, such as the native raccoon and striped skunk, as well as the nonnative Virginia opossum, Norway rat, black rat, and feral cat occur within this habitat. Southern alligator lizards and western fence lizards will forage for insects in riparian habitat along Belmont Creek and the unnamed channels in the Plan.

Resident bird species that nest and forage in the riparian habitat along Belmont Creek and the unnamed channels in the Plan include many of the species that inhabit the surrounding developed/landscaped area (refer to discussion above). In addition, several resident species that are associated with aquatic and freshwater marsh vegetation will nest and forage in this habitat, such as the song sparrow and mallard.

A number of common migrant and wintering birds will rest and forage in the native riparian trees along the creek. These include migrant and wintering species that are found in surrounding developed/landscaped areas such as the yellow-rumped warbler, white-crowned sparrow, golden-crowned sparrow, and ruby-crowned kinglet. In addition, several migrants and wintering birds that are associated with riparian habitats, such as the yellow warbler, Pacific-slope flycatcher, and Lincoln's sparrow, will use this habitat in low numbers.

Raptor species that occur in the surrounding areas such as the resident red-tailed hawk, red-shouldered hawk, and Cooper's hawk will forage for prey within the riparian habitats in the Plan; however, no trees within this habitat are large enough to provide suitable nesting sites for these species.

No cavities large enough to support colonies of roosting bats, or crevices small enough to support individual bats, were observed within any of the trees in the riparian habitat during the January 2023 site visit.

Freshwater Marsh

Vegetation

Freshwater marsh vegetation is located in sparse clusters at the toes of slopes and/or in the low-flow channels of Belmont Creek and the unnamed channels in the Plan.[27] These clusters consist almost entirely of cattail, but several limited areas of freshwater marsh vegetation are dominated by native species other than cattail such as bulrush, fat-hen, tall flatsedge, and resprouting swordleaf rush. The margins of these freshwater marsh areas are dominated by nonnative annual herbaceous weeds in the small ecotones where marsh vegetation transitions to upland vegetation on creek and channel slopes.

[27] It is likely that the high storm flows that occurred during the January 2023 site visit obscured observation of freshwater marsh vegetation along Belmont Creek and in channels with high water levels; therefore, the extent of freshwater marsh vegetation in the Plan under more normal circumstances may be greater than what was mapped during the site visit.

Wildlife

Freshwater marshes often provide habitat for a distinctive suite of wetland-associated wildlife species. However, the small size and patchy distribution of the freshwater marsh vegetation in the Plan, coupled with disturbance from immediately adjacent developed areas, reduces the quality of this habitat for many wetland-associated wildlife species.

Certain marsh-nesting birds such as the red-winged blackbird and San Francisco common yellowthroat, a California species of special concern, are known to nest and forage in narrow marsh habitats such as those in the Plan; however, the marsh habitat in the Plan is of relatively low quality for these species due to its limited extent, patchy distribution, and high levels of immediately adjacent human disturbance. Marsh-associated bird species that inhabit smaller marshes and are tolerant of adjacent human disturbances, especially those that can use adjacent herbaceous riparian vegetation, will nest and forage in this habitat. These include the song sparrow and marsh wren. Common nonbreeding avian foragers in this habitat include wading birds such as the great egret, snowy egret, and green heron. Common amphibians such as the native Pacific tree frog and western toad as well as the nonnative bullfrog also breed and forage in freshwater marsh habitat in the Plan.

Aquatic Riverine

Vegetation

Aquatic riverine habitat in the Plan consists of the low-flow channels of Belmont Creek and the unnamed channels. Belmont Creek and the two larger unnamed channels in the Plan are perennial and contain water year-round, while the smaller channels that flow along the northeast and southeast peripheries of the Plan are intermittent. Aquatic plants may grow in these channels, but none were visible in January 2023 due to the opaque water.

Wildlife

Belmont Creek provides habitat for several species of fish such as the native threespine stickleback, as well as the nonnative rainwater killifish and western mosquitofish. Although the unnamed channels in the Plan are assumed to be connected to the San Francisco Bay downstream, this connection occurs through presumably long underground pipes that do not provide suitable habitat for fish, and high flow velocities through such pipes would make it very difficult for fish to swim upstream into the Plan during high flows.

The native Pacific tree frog, as well as nonnative species such as the bullfrog and crayfish, which can move between waterbodies over land, may be present and breeding within Belmont Creek and the unnamed channels in the Plan. These areas also provide foraging habitat for waterbirds such as the mallard, as well as wading birds such as the great egret, snowy egret, and green heron. Birds that forage aerially for invertebrates such as the black phoebe, barn swallow, and cliff swallow, as well as bats that roost in nearby areas such as the California myotis and Mexican free-tailed bat, will forage over aquatic habitats in the Plan area.

Special-Status Species

Special-Status Plants

A search for special status plant and animal species in the California Native Plant Society (CNPS) and California Natural Diversity Database (CNDDB) identified a total of 96 special-status plant species as potentially occurring in the Plan area. All of these species were determined to be absent from the Plan for at least one of the following reasons: (1) lack of suitable habitat types; (2) absence of specific microhabitat or edaphic requirements, such as serpentine soils; (3) the elevation range of the species is outside of the range within the Plan area; and/or (4) the species is considered extirpated from the Plan vicinity.

Special-Status Animals

A total of 12 special-status animals have the potential to occur on or immediately adjacent to the Plan area, as summarized in Table 3.4-1 below.

Table 3.4-1: Special-Status Animals with the Potential to Occur in the Plan

Name	Regulatory Status	Occurrence in Plan
Monarch butterfly	FPT	No larval host plants were observed within the Plan during the January 2023 survey; however, portions of the site are maintained by mowing, and milkweeds, if present, would not have been detectable. If milkweeds are present, monarch butterflies may breed within the Plan from March through October. However, only small numbers of monarch butterflies are expected to breed there, if any. Small numbers of individuals may forage throughout the Plan, especially during spring and fall migration. However, the Plan does not provide high-quality foraging habitat for this species.
Northwestern pond turtle[1]	FPT, CSSC	The nearest CNDDB record is 3.5 miles to the west near the Crystal Springs Reservoir. Suitable foraging habitat for northwestern pond turtles may be present within Belmont Creek and along the unnamed channels in the Plan. However, breeding populations of western pond turtles have been extirpated from most urbanized areas in the Plan region. Nevertheless, it is possible that occasional pond turtles from populations in freshwater habitats upstream in Belmont Creek could potentially disperse downstream to Belmont Creek, and overland to other channels in the Plan, although they would be expected to do so in extremely low numbers, if at all.

Name	Regulatory Status	Occurrence in Plan
Tricolored blackbird[1]	ST	Tricolored blackbirds typically nest in extensive stands of tall emergent herbaceous vegetation in nontidal freshwater marshes and ponds. However, the freshwater marsh habitat in the Plan area is too small and fragmented to support a nesting colony of this species. This species has not been recorded nesting on or near the Plan area. However, tricolored blackbirds may forage within the Plan area during the nonbreeding season.
Central California roach	CSSC	Central California roach are not known to occur in Belmont Creek. However, this species occurs widely, often in unshaded pools with warm temperatures, and thus the possibility that it can occur within the reach of Belmont Creek within the Plan cannot be ruled out.
Sacramento hitch	CSSC	Sacramento hitch are not known to occur in Belmont Creek. However, this species occurs widely and has a high tolerance of stream conditions and water temperatures, and thus the possibility that it can occur within the reach of Belmont Creek within the Plan cannot be ruled out.
Vaux's swift[1]	CSSC (nesting)	Vaux's swifts are not known to nest in the San Carlos area. No snags or chimneys are present on or immediately adjacent to the Plan to provide suitable sites for nesting. Occasional migrants forage aerially over the Plan.
Yellow warbler[1]	CSSC (nesting)	Yellow warblers are common migrants in the Plan area and surrounding vicinity, and may use the riparian habitat along Belmont Creek and the unnamed channels for resting and foraging during spring and fall migration. However, they are not known or expected to nest in the Plan due to the absence of suitably extensive riparian habitat, and this species is considered a species of special concern only when nesting.
San Francisco common yellowthroat	CSSC	Common yellowthroats occur year-round in marshes of the Redwood Shores peninsula. The marsh habitat and adjacent herbaceous riparian vegetation along Belmont Creek and the unnamed channels in the Plan provide suitable nesting and foraging habitat for this species. However, due to the limited extent and patchy distribution of this habitat, as well as high levels of human disturbance, only small numbers of common yellowthroats

Name	Regulatory Status	Occurrence in Plan
		(e.g., one to two pairs) are expected to nest within the Plan, if any.
Alameda song sparrow[1]	CSSC	Suitable vegetation for nesting by Alameda song sparrows is present in salt marsh habitat along Belmont Creek downstream of the Plan area, north of U.S. Route 101. The location of the interface between populations of the Alameda song sparrow and the common race that breeds in freshwater riparian habitats in the region is not definitive due to difficulties distinguishing these subspecies in the field. However, the CSSC subspecies is known to nest only in salt marsh habitats, which are absent from the Plan.
Bryant's savannah sparrow[1]	CSSC	The marsh and ruderal habitats along Belmont Creek and the unnamed channels in the Plan area do not provide suitable nesting habitat for Bryant's savannah sparrows because these areas are nontidal and the vegetation along the creek and channels is too narrow in extent to support nesting by this species. However, individuals may nest in suitable pickleweed dominated marsh habitat downstream of the Plan along Belmont Creek and Belmont Slough. During the nonbreeding season, Bryant's savannah sparrows may forage in open habitats throughout the Plan area.
Palid bat	CSSC	Historically, pallid bats were likely present in a number of locations throughout the Plan area region, but their populations have declined in recent decades. Suitable roosting habitat for this species is present within the Plan in unoccupied buildings. Although regular human disturbance limits the site's suitability to support a maternity colony or day roost, and the presence of a colony of pallid bats within the Plan is unlikely, individuals from colonies in the region may occasionally forage within the Plan.
Townsend's big-eared bat	CSSC	Townsend's big-eared bats are known to occur in the Santa Cruz Mountains to the southwest. Suitable roosting habitat for this species is present within the Plan in unoccupied buildings. Although regular human disturbance limits the site's suitability to support a maternity colony or day roost, and the presence of a colony of Townsend's big-eared bats within the Plan area is unlikely, individuals from colonies in the region (especially in the Santa Cruz Mountains to the

Name	Regulatory Status	Occurrence in Plan
		southwest) could occasionally forage over the site.
Western red bat[1]	CSSC	Individual western red bats occur in the Plan vicinity in low numbers as migrants and winter residents, but this species does not breed in the region. Individual western red bats may roost in the foliage of trees virtually anywhere in the Plan, but are expected to roost primarily in riparian areas. Occasional individuals may forage over the site year-round.
White-tailed kite	SP	White-tailed kites are known to nest in eastern San Mateo County throughout the open areas bordering the San Francisco Bay. Suitable large trees for nesting are present in the Plan, and up to one pair of white-tailed kites could nest in suitable nest trees in the Plan. Individuals may forage occasionally within the Plan year-round.

Notes:

Federally Endangered (FE); Federally Threatened (FT); Federal Proposed Threatened (FPT); State Threatened (ST); State Candidate (SC)State Fully Protected (SP); California Species of Special Concern (CSSC).

[1] May be Present as Nonbreeder.

Source: H.T. Harvey & Associates. *San Carlos Northeast Area Specific Plan Biological Resources Report.* May 2025.

Sensitive Habitat

Sensitive habitats are protected and regulated by the USACE, RWQCB, CDFW, and/or the USFWS. No sensitive natural communities or vegetation alliances were identified in the Plan.

The riparian habitat within the Plan is under the jurisdiction of the CDFW. Section 1602 of the Fish and Game Code regulates jurisdiction over the bed, channel, or bank of any river, stream or lake. CDFW riparian jurisdiction extents to the outer edge of riparian tree or shrub canopy along Belmont Creek and the unnamed channels in the Plan.

Portions of Belmont Creek and the unnamed channels (ordinary high water mark [OHW]) are under the jurisdiction of the USACE and regulated under Section 404 of the Clean Water Act as waters of the U.S. and waters of the state, refer to the riverine and freshwater marsh habitat shown on Figure 3.4-1.

Wildlife Movement

Habitat corridors are essential to terrestrial animals as they provide connectivity between and amongst core habitat areas (i.e., larger, intact habitat areas where species make their living). Connections between two or more habitat areas help ensure that genetic diversity is maintained,

thereby diminishing the probability of demographic or geographic extinction. Movement corridors in California are typically associated with valleys, rivers, and creeks supporting riparian vegetation and ridgelines. With increasing encroachment of humans on wildlife habitats, it has become important to establish and maintain movement corridors and linkages for animals to be able to access locations containing different biotic resources that are essential to maintaining their life cycles.

Belmont Creek provides a movement corridor for fish and other aquatic species, as well as mammals, amphibians, and reptiles. The unnamed channels in the Plan also provide movement corridors for wildlife. However, because these channels connect to other aquatic habitat via underground pipes, they do not provide high-quality movement corridors for fish and other aquatic species. Terrestrial species will make short, local movements along these channels; however, the lack of connectivity between the unnamed channels and high-quality habitat outside of the Plan precludes the use of these channels for longer-distance regional movement by wildlife.

The Plan is located approximately 0.5 mile southwest of bayland habitats, and is largely devoid of habitat areas that would support high numbers of birds, especially migratory bird. The riparian habitat along Belmont Creek serves as the highest-quality movement corridor habitat for migrant songbirds within the Plan. However, no high-quality migratory stopover habitat is present within the Plan.

3.4.2 Impact Discussion

For the purpose of determining the significance of the project's impact on biological resources, would the project:

1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?
2) 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 CDFW or USFWS?
3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

3.4.2.1 *Project Impacts*

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Special-Status Plants

As stated in Section 3.4.1.2 Existing Conditions, there are no special-status plant species in the Plan area. The majority of the Plan area is developed, with the only undeveloped areas consisting of Belmont Creek, the unnamed channels, and their associated riparian habitat. Due to the nature of the creek and channels, which are engineered, not in their historical alignments, and subject to high-volume scouring flows in the winter, the aquatic habitat and freshwater marsh vegetation along these channels would not be considered suitable habitat for any of the special-status plants that are known to occur in wetlands and aquatic habitats in the region. Similarly, the riparian habitat along Belmont Creek and the unnamed channels is dominated by either dense thickets of arroyo willow, which has a sparse to absent understory; dense thickets of nonnative ground covers, or nonnative annual grasses. As such, these areas do not provide suitable habitat for any of the special-status plants that are known from the region.

Special-Status Animals

Table 3.4-1 in Section 3.4.1.2 Existing Conditions summarizes the 12 special-status animals that have the potential to occur on or immediately adjacent to the Plan area.

Monarch Butterfly

The monarch butterfly occurs in the Plan area primarily as a migrant. No larval host plants (milkweeds) were observed within the Plan area during the January 2023 survey; however, portions of the Plan are maintained by mowing, and milkweeds, if present, would not have been detectable at the time. If milkweeds are present, monarch butterflies may breed within the Plan area from March through October. However, due to the limited extent of potentially suitable habitat within the Plan area and regular human disturbance (e.g., from mowing and landscape activities), only small numbers of monarch butterflies are expected to breed there, if any. Small numbers of individuals may forage on flowering plants throughout the Plan area, especially during spring and fall migration. However, the Plan does not provide high-quality foraging habitat for this species.

Plan activities could impact monarch butterfly habitat by removing milkweeds (if present) and flowering plants that provide nectar sources. However, no high-quality habitat capable of supporting large numbers of monarchs is present in the Plan area, so habitat modification would not result in substantial impacts on populations of this species. Further, the Plan would involve increases in open space (i.e., 20 percent of each development would be dedicated to open space) and increases in planting of native vegetation within the proposed Belmont Creek setback and

riparian bank. As a result, the Plan would have an overall beneficial effect on habitat for monarchs, and no significant impact to monarch habitat would occur.

If monarchs are breeding in the Plan area, removal or disturbance of milkweed could result in the loss of eggs or larvae, and pupae could also be impacted if breeding is occurring. However, there is no evidence that large numbers of monarchs breed in the Plan area, if breeding occurs at all, so impacts to monarch eggs, larvae, or pupae would not result in substantial impacts on populations of this species. As a result, Plan impacts on the monarch butterfly would be less than significant.

Northwestern Pond Turtle

Breeding populations of northwestern pond turtles have been extirpated from most urbanized areas in the Plan area region due to urbanization, predation, and development of upland nesting and dispersal habitat. Nevertheless, suitable foraging habitat for northwestern pond turtles may be present within Belmont Creek and along the unnamed channels in the Plan area. It is possible that occasional pond turtles from populations in freshwater habitats upstream in Belmont Creek could disperse downstream to Belmont Creek, and overland to other channels in the Plan area. In the absence of water quality protection measures, Plan activities could degrade foraging habitat for northwestern pond turtles within Belmont Creek (refer to discussion below).

If northwestern pond turtles are present in upland areas (e.g., during dispersal or attempts to find nest sites), construction activities could result in injury or mortality of turtles, or construction of new impediments to dispersal back to areas with more suitable habitat conditions, outside the Plan area. However, very few northwestern pond turtles (if any) are present, and because this species' activities are confined primarily to waterbodies, which would not be directly impacted at all by Plan activities, the probability and magnitude of any impacts by Plan activities is very low.

Further, the Plan would increase the current SCMC creek setback requirement from 25 feet to 35 feet for redevelopment along Belmont Creek (where turtles are most likely to occur in the Plan area) and require a natural vegetated buffer along drainage channels for redevelopment activities.[28] These actions would further reduce the likelihood of northwestern pond turtles being impacted by Plan activities and improve habitat conditions along streams. For all these reasons, potential impacts to the northwestern pond turtle from future activities under the Plan would be less than significant.

Nesting Birds

The San Francisco common yellowthroat (a California species of special concern) could potentially nest in marsh habitat and adjacent herbaceous riparian vegetation along Belmont Creek and the unnamed channels in the Plan area. However, due to the limited extent and patchy distribution of this habitat, as well as high levels of human disturbance, only small numbers of common yellowthroats (e.g., one to two pairs) are expected to nest within the Plan area. Similarly, it is

[28] Under existing conditions, existing development in the Plan does not provide a 25-foot setback since most development pre-dates the City's setback requirements.

possible that a pair of white-tailed kites (a state fully protected species) could nest in trees somewhere in the Plan area. In addition, a number of non-special-status bird species breed throughout the Plan area.

Redevelopment under the Plan would not result in the loss of suitable nesting or foraging habitat for the San Francisco common yellowthroat, as no activities are proposed within wetland or riparian habitat in the Plan area. However, vegetation removal could remove trees suitable for use by nesting white-tailed kites and could remove structures and vegetation used for nesting by a variety of other, non-special-status bird species. Further, demolition and construction activities that occur during the nesting season could physically impact nests with eggs or young and could cause a substantial increase in noise or human activity near active nests may result in the abandonment of active nests. In addition, heavy ground disturbance, noise, and vibrations caused by project activities could potentially disturb nesting and foraging individuals and cause them to move away from work areas.

Because the number of nesting pairs of San Francisco common yellowthroats and white-tailed kites that could be disturbed directly or indirectly is very small (i.e., one to two pairs of common yellowthroats and one pair of kites), the impacts of Plan redevelopment would represent a very small fraction of the regional population of these species. Similarly, the common bird species that nest in the Plan area are regionally abundant, are present in widely available habitats in the region, and will continue to be present in some portions of the Plan area following construction, so that development under the Plan would impact only a very small proportion of their regional populations, and the number of individuals likely to be displaced by habitat disturbance and loss would be quite small with respect to the amount of suitable habitat available in the area. The Plan would result in an increase in vegetated open space, particularly along streams where habitat quality is (and could potentially be, with redevelopment) highest, by increasing open space requirements and increasing the setback from Belmont Creek for redevelopment activities. Thus, impacts on regional populations of any one bird species resulting from Plan activities would be low. However, given the extent of the Plan area, the overall number of active nests of all bird species that are protected by the MBTA and California Fish and Game Code, and that are impacted by Plan activities, could be relatively high, and would be considered significant under CEQA.

Impact BIO-1: Future construction activities associated with build out under the Plan could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.

Consistent with General Plan Policy EM-1.2, future development under the Plan would implement the following Specific Plan Project Requirements pertaining to migratory nesting birds.

Special-Status Species Project Requirements

- **Avoid Nesting-Season Construction if Feasible.** To the extent feasible, demolition and construction activities shall be scheduled to avoid the nesting season. The nesting season for most birds in San Mateo County extends from February 1 through August 31, inclusive. If

construction activities are scheduled to take place outside the nesting season, all impacts to nesting birds protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code would be avoided.

- **Conduct Pre-activity Survey for Active Nests.** If it is not possible to schedule construction activities and/or tree removal between September 1 and January 31, preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests shall be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of demolition or construction activities, including tree removal and pruning. During this survey, the biologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests. Prior to any tree removal, or approval of any grading or demolition permits (whichever occurs first), the ornithologist shall submit a report indicating the results of the survey and any designated buffer zones to the City's Planning Manager.
- **Provide a Buffer around Active Nests**. If an active nest (i.e., a nest with eggs or young) is found sufficiently close to work areas to be disturbed by these activities, the biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code shall be disturbed during project implementation.

With the implementation of the above proposed Specific Plan Project Requirement, future development in the Plan area would not result in impacts to special-status birds and migratory nesting birds by ensuring no construction work takes place in or near their habitat.

Roosting Bats

There is some potential for three special-status bat species that are designated as California species of special concern to occur in the Plan area. The pallid bat and Townsend's big-eared bat breed in the greater San Francisco Bay area, although primarily in areas that are less urban than the Plan area. Due the extent of human disturbance within the Plan area, the probability that either the pallid bat or Townsend's big-eared bat breed (i.e., form maternity colonies) in the Plan area is very low. The third special-status bat species, western red bat, does not breed on the San Francisco Peninsula but could occur in the Plan area in small numbers as a migrant and wintering species, roosting solitarily in the foliage of trees.

No trees with cavities suitable for large bat colonies or crevices suitable for individual roosting bats were observed within the Plan area. Additionally, no evidence of active bat roosts was observed on building exteriors during the January 2023 or April 2025 site visit. However, focused surveys (e.g., examination of building interiors and acoustic surveys) to determine presence/absence of roosting bats within buildings in the Plan area were not performed. However, several buildings were determined to be suitable for use by roosting bats under existing conditions; and a number of other buildings were determined to be potentially suitable for use by roosting bats if unoccupied by human activity (refer to Figure 3.4-2). Therefore, it is possible that buildings in the Plan area could

support roosting bats, including both large and small maternity and non-maternity colonies, especially if they have not been occupied for long periods of time.

Impacts on the western red bat are less than significant because very few individuals would be impacted. This species occurs solitarily during migration and winter, rather than in large groups, and due to the urban nature of the Plan area, it is likely that very few individuals occur in the Plan area at any given time. If a western red bat is present in a tree to be removed, the bat would flush when tree removal activities begin, avoiding direct injury or mortality. Bats that flush during the day would be subject to increased risk of predation by avian predators, but few western red bats (if any) are expected to be injured or killed as a result of Plan activities.

The demolition of any structures supporting a roost of other, cavity/crevice-roosting bat species would result in the direct physical disturbance of any roosting bats that may be present, possibly resulting in injury or mortality, as well as the loss of roosting sites. Building improvements and renovations could also result in such impacts if they affect areas where bats are present or if they block ingress or egress to roost sites; the kinds of improvements most likely to affect bats are those that physically alter the exteriors (including exterior walls), roofs, and attic-like spaces of buildings or that plug holes, cavities, or crevices that allow bats to enter or exit buildings supporting bats.

Demolition or renovation of structures during the bat maternity season (approximately April 1 to August 31) could result in the injury or mortality of young and lactating females within a roost site. Impacts on any pallid bats or Townsend's big-eared bats, a large day roost (i.e., 20 or more bats) of common species of bats, or cumulative impacts on 20 or more common bats as multiple buildings are removed, would be considered a significant impact under CEQA, as this could have a substantial effect on regional populations of the species.

Impact BIO-2: Future demolition activities under the Plan could result in direct physical disturbance of any roosting bats that may be present, possibly resulting in injury or mortality, as well as the loss of roosting sites.

Consistent with General Plan Policy EM-1.2, if buildings identified as "Currently Suitable" and buildings identified as "Potentially Suitable if Building is Unoccupied" on Figure 3.4-2 are proposed to demolished or renovated[29], the following Specific Plan Project Requirements pertaining to special-status roosting bats.

Roosting Bat Project Requirements

- **Conduct Pre-Activity Surveys for Roosting Bats.** A pre-activity habitat assessment and survey for roosting bats shall be conducted prior to removal or renovation of buildings. The

[29] Building improvements and renovations could also result in such impacts if they affect areas where bats are present or if they block ingress or egress to roost sites; the kinds of improvements most likely to affect bats are those that physically alter the exteriors (including exterior walls), roofs, and attic-like spaces of buildings or that plug holes, cavities, or crevices that allow bats to enter or exit buildings supporting bats.

habitat assessment and survey shall be conducted by a qualified biologist. If the biologist determines that a building provides no suitable bat roost sites, no bat survey would be necessary, but if suitable roost sites exist, a visual survey shall be conducted during the daytime to determine whether bats are present. During this survey, the biologist shall look for bats and evidence of their presence (e.g., guano or urine staining). If the visual survey cannot adequately determine whether bats are present, a dusk survey shall be conducted during suitable weather conditions for bat activity to determine whether bats enter or exit the roost. If no active roosts are found, then no further action is warranted. If a roost is present, a qualified biologist shall determine the species and number of individuals present and implement further measures as described below. Prior to any tree removal, or approval of any grading or demolition permits (whichever occurs first), the biologist shall submit a report indicating the results of the survey and avoidance requirements to the City's Planning Manager.

- **Avoid Disturbance of Active Roosts.** If an occupied roost is found in a structure that would be disturbed or removed by proposed activities, the project may be redesigned to avoid the disturbance of the structure. If the roost is unoccupied at the time of the survey, the project proponent may have a qualified biologist install bat exclusion devices to prevent bats from taking up occupancy of the structure prior to the onset of the proposed activity. If avoidance is not feasible, the following measures shall be implemented.
- **Avoid Disturbance of Maternity Roosts.** If an active maternity roost is present within the building to be demolished or disturbed and the project cannot be redesigned to avoid removal or disturbance of the occupied roost, disturbance shall not take place during the maternity season (as determined by the qualified biologist, but approximately April 1 to August 31), and an appropriate disturbance-free buffer zone (also determined by the qualified biologist) shall be observed during this period to avoid disturbing the roosting bats. Following the maternity season, bats can be excluded as described below.



Source: H.T. Harvey & Associates, May 2025.

POTENTIAL BAT ROOST SITES

FIGURE 3.4-2

- **Exclude Bats Prior to Disturbance.** If disturbance of an active non-breeding roost cannot be avoided, the individuals shall be safely evicted outside the maternity season (as determined by the qualified biologist) between approximately September 1 and April 1. Exclusion methods may include the installation of one-way doors, use of ultrasonic deterrence devices, changing air flow and temperature regimes in the roost space, or other methods that would not trap bats or involve handling bats. One-way doors and/or deterrence devices should be left in place for a minimum of two weeks with a minimum of five fair-weather nights with no rainfall and temperatures no colder than 50°F.

With the implementation of the above proposed Specific Plan Project Requirement, future development in the Plan area would not result in impacts to roosting bat individuals by ensuring proper handling and removal from the site if necessary.

Non-Breeding Special-Status Birds

Several special-status bird species may occur in the Plan area as nonbreeding migrants, transients, or foragers, but they are not known or expected to breed or occur in large numbers within or near the Plan area. These are the Vaux's swift, Alameda song sparrow, Bryant's savannah sparrow, tricolored blackbird, and yellow warbler. The Vaux's swift is an aerial forager that would not roost or nest in the Plan area. The other four species may forage in the Plan area, though due to limited availability and low quality of foraging habitat, the Alameda song sparrow, Bryant's savannah sparrow, and tricolored blackbird would occur only in low numbers and/or irregularly. Yellow warblers may be common, foraging in ornamental vegetation, during migration.

Activities under the Plan would have some potential to impact foraging habitats and/or individuals of these species. Construction activities might result in a temporary direct impact through the alteration of foraging patterns (e.g., avoidance of work sites because of increased noise and activity levels during maintenance activities) but would not result in the loss of individuals, as individuals of these species would fly away from any construction areas or equipment before individuals could be injured or killed. Further, the Plan area does not provide important foraging habitat used regularly or by large numbers of individuals of any of these species. As a result, impacts under Plan activities will have little impact on these species' foraging habitat and no substantive impact on regional populations of these species. Therefore, this impact would be less than significant.

Indirect Water Quality and Special-Status Species along Belmont Creek

No activities are proposed that would directly impact Belmont Creek or any other wetland, aquatic, or riparian habitats. Nevertheless, two fish that are California species of special concern (central California roach and Sacramento hitch) may occur in Belmont Creek along the northern edge of the Plan area, and a number of special-status fish and marsh species occur along Belmont Creek and Belmont Slough downstream from the Plan area, and in the absence of measures to protect water quality, development under the Plan could adversely affect water quality, and in turn the habitat quality and health of those species.

However, such impacts would be avoided and minimized by implementing erosion and sediment control measures, as well as BMPs for work near aquatic environments. Construction projects in California causing land disturbances that are equal to one acre or greater must comply with state requirements to control the discharge of stormwater pollutants under the NPDES Construction General Permit (refer to Section 3.10 Hydrology and Water Quality). Prior to the start of construction/demolition, a Notice of Intent (NOI) must be filed with the State Water Board describing the project. A Storm Water Pollution Prevention Plan (SWPPP) must be developed and maintained during the project and it must include the use of BMPs to protect water quality until the site is stabilized. Standard permit conditions under the Construction General Permit require that the applicant utilize various measures including: on-site sediment control BMPs, damp street sweeping, temporary cover of disturbed land surfaces to control erosion during construction, and utilization of stabilized construction entrances and/or wash racks, among other factors.

In many Bay Area counties, including San Mateo County, projects must also comply with the Municipal National Pollutant Discharge Elimination System (NPDES) Permit (MRP). This permit requires that all projects implement BMPs and incorporate Low Impact Development practices into the design to prevent stormwater runoff pollution, promote infiltration, and hold/slow down the volume of water coming from a site after construction has been completed. In order to meet these permit and policy requirements, projects must incorporate the use of green roofs, impervious surfaces, tree planters, grassy swales, bioretention and/or detention basins, among other factors. Further, future development under the Plan would be required to treat stormwater runoff, increase the current SCMC creek setback requirement from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. These actions will improve the quality of runoff from Plan areas, relative to existing conditions. As a result, potential impacts of Plan activities on water quality and special-status fish and marsh species downstream from the Plan area would be less than significant.

Artificial Lighting Impacts

Many animals are sensitive to light cues, which influence their physiology and shape their behaviors. Artificial lighting may indirectly impact mammals and birds by increasing the nocturnal activity of predators such as owls, hawks, and mammalian predators. The presence of artificial light may also influence habitat use by rodents and by breeding birds by causing avoidance of well-lit areas, resulting in a net loss of habitat availability and quality. Excessive lighting can also alter the behavior of migrating birds. Vertical beams can disorient birds flying at lower altitudes. Birds that encounter beams from up-lights are likely to respond to the lights, and may become disoriented or attracted to the lights to the point that they collide with buildings or other nearby structures.

A Caltrans review of the effects of LEDs on terrestrial wildlife concluded that many species are less sensitive to longer wavelengths/higher-temperature LEDs, but responses vary among species and taxonomic groups, and the diversity of responses of terrestrial wildlife species to lighting temperatures is too large to provide a single recommendation for an ideal lighting spectral composition. Nevertheless, the International Dark-Sky Association, the American Bird Conservancy, and other organizations currently recommend using lighting with a color temperature of 3,000

Kelvin and lower, or ideally 2,700 Kelvin and lower, because cooler/bluer light (defined as 3,000 Kelvin and greater) has a stronger negative effect on plants and animals compared to warmer/redder lights (defined as 2,700 Kelvin and lower).

Currently, considerable artificial lighting of a variety of wavelengths exists in the Plan area and surrounding areas. Simply replacing existing lighting with new lighting of similar intensity, wavelength, and directionality would not result in a substantial impact on wildlife relative to baseline conditions. However, increasing the amount of lighting in the Plan area, the amount of lighting pointed toward the sky, and the amount of lighting with color temperature greater than 2,700 Kelvin could impact wildlife by changing their behavioral patterns, disorienting animals, altering predator-prey dynamics, and affecting other important biological processes and relationships. Such impacts would be particularly detrimental along Belmont Creek and other drainages that support native wildlife, and for migratory birds that may become disoriented (potentially increasing the frequency of bird collisions, as discussed under checklist question d) below) by up-lighting.

Impact BIO-3: Future development under the Plan would introduce new sources of artificial lighting that could impact wildlife.

Consistent with General Plan Policy EM-1.2, future development under the Plan would implement the following Specific Plan Project Requirements pertaining to artificial lighting.

Artificial Lighting Project Requirements

- The following measures will be implemented during any renovation or redevelopment under the Plan that involves new outdoor lighting or replacement of existing lighting with fixtures or luminaires that are not identical in intensity, wavelength, and directionality to those being replaced.
    - Through a combination of proper fixture selection, low mounting height, glare shielding, and orientation/aiming of light fixtures, the design team shall actively control undesirable spill of light toward sensitive habitat areas (i.e., Belmont Creek, other drainage channels and associated wetland and riparian habitat, or vegetated open space areas). All exterior lighting shall be fully shielded to block illumination from shining outward toward such sensitive habitat areas and to prevent the lit portions of these fixtures (i.e., the lamps) from being directed toward the sensitive habitat areas.
    - Outdoor lighting fixtures shall incorporate lamps with a Correlated Color Temperature of 2700 Kelvin or less.
    - Up-lighting shall be avoided, all fixtures shall have a backlight, uplight, and glare (BUG) up-light rating of U0, and the maximum vertical illuminance at any point in the plane of the property line will be 0.05 footcandle, unless the following conditions are met:

- All up-light is directed at building facades such that no light spills upwards past a structure (e.g., into the sky) or outwards into adjacent areas.
- The fixture is programmed to switch off between 10:00 p.m. and sunrise.

With the implementation of the above proposed Specific Plan Project Requirement, future development in the Plan area would not result in impacts to special-status species from artificial lighting.

As discussed above, with the implementation of Specific Plan Project requirements for special-status species, future development under the Plan would result in less than significant impacts to special-status species. **(Less than Significant Impact)**

b) 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 CDFW or USFWS?

As described above in Section 3.4.1.2 Existing Conditions, riparian habitat is present along Belmont Creek and several drainage channels within the Plan, as shown on Figure 3.4-1. The riparian habitat within the Plan area is under the jurisdiction of the CDFW. No sensitive natural communities or vegetation alliances were identified in the Plan.

The Plan would not result in direct impacts to Belmont Creek or any riparian habitats. The Plan would implement a 35-foot setback from the existing top of bank. As discussed in Section 2.3.2.2 Pedestrian and Bicycle Improvements, the Plan would implement a 10-foot-wide trail along Belmont Creek. It is anticipated that future development along Belmont Creek would implement the trail. Alterations to the creek are not proposed as part of the Plan and development adjacent to the creek would be evaluated pursuant to CEQA once a project-level design is available. As described above under checklist question a) and in Section 3.10 Hydrology and Water Quality, all development under Plan buildout would implement measures to minimize the potential for adverse impacts to water quality during and following construction. Further, the Plan would require treatment of stormwater runoff, increase the creek and riparian setback from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. These actions would improve the quality of runoff from Plan areas, relative to existing conditions, and would enhance the quality of wetland and aquatic habitats. As a result, potential indirect impacts of Plan activities on sensitive habitats would be less than significant. **(Less than Significant Impact)**

c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?

Portions of Belmont Creek and the unnamed channels (OHW) are under the jurisdiction of the USACE and regulated under Section 404 of the Clean Water Act as waters of the U.S. and waters of the state. Buildout of the Plan would not result in direct impacts to Belmont Creek or any other wetland or aquatic habitats. As discussed in Section 2.3.2.2 Pedestrian and Bicycle Improvements, the Plan would implement a 10-foot-wide trail along Belmont Creek. It is anticipated that future development along Belmont Creek would implement the trail. Alterations to the creek are not proposed as part of the Plan and new development adjacent to the creek would be evaluated pursuant to CEQA once a project-level design is available. As described in Section 3.10 Hydrology and Water Quality, all development under Plan buildout would implement measures to minimize the potential for adverse impacts to water quality during and following construction. As discussed under checklist question b), the Plan would require treatment of stormwater runoff, increase the creek setback from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. These actions would improve the quality of runoff from Plan areas, relative to existing conditions, and would enhance the quality of wetland and aquatic habitats. As a result, potential indirect impacts of Plan activities on wetland and aquatic habitats would be less than significant. **(Less than Significant Impact)**

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife Movement

Wildlife corridors are areas of land that connect large areas of habitat where animals live and move. These corridors help animals move through natural areas. As discussed above in Section 3.4.1.2 Existing Conditions, Belmont Creek provides a movement corridor for fish and other aquatic species, as well as mammals, amphibians, and reptiles. However, the narrow nature of the riparian corridor along this creek and intensively urban land uses along the creek limit wildlife movement. The unnamed channels in the Plan area also provide movement corridors for wildlife. However, because these channels connect to other aquatic habitat in the vicinity via underground pipes, they do not provide high-quality movement corridors for fish and other aquatic wildlife species. Due to development throughout and surrounding the Plan area, no other well-defined or important movement corridors are present within the Plan area. Wildlife species may move through the developed portions of the Plan area using cover and refugia as they find available. However, most dispersal by wildlife species in the Plan area vicinity likely occurs within higher-quality habitats present in natural sloughs, marshes, and aquatic habitat areas located approximately 0.5 mile northeast of the Plan area. Although migratory songbirds use the Plan area as well, no high-quality migratory stopover habitat, such as extensive riparian habitat, oak woodland, or well-vegetated parks, is present within the Plan area.

Buildout under the Plan would not result in any loss or degradation of aquatic, wetland, or riparian habitat along Belmont Creek or other existing drainages. Further, the Plan will increase the current SCMC creek setback requirement from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. These actions would broaden the corridors for wildlife movement along these waterbodies, which would enhance the potential for wildlife movement. Increases in open space and native vegetation as a result of the Plan would enhance habitat for migrant birds. For all these reasons, Plan impacts on wildlife movement would be less than significant.

The Plan would not cause substantial impacts to any important native wildlife nursery sites (i.e., an area where breeding is concentrated such as a heron rookery, pinniped pupping area, or seabird colony). Impacts on breeding animals, including breeding colonies of animals (e.g., bat maternity colonies), may occur as described under checklist question a) above, but no breeding areas for the species are so large or regionally important that they rise to the level of an "important native wildlife nursery site".

Bird Collision

The Plan area and surrounding areas in all directions consist primarily of developed areas such as buildings, parking lots, and roads. Vegetation throughout much of the Plan area is sparse, with only a few non-native landscaped trees and shrubs, and does not draw in large number of birds to the area. However, the dense riparian habitat along Belmont Creek attracts birds to the area, with the other channels and associated riparian habitat supporting fewer birds due to their very narrow nature and the limited development of riparian vegetation.

The Plan would result in the enhancement of habitat along Belmont Creek, other channels, and in the Plan area in general, due to the increase in the riparian setback for redevelopment along Belmont Creek, the requirement for native revegetation in riparian areas, and the increase in open space requirements. Increases in vegetated open space, particularly where native vegetation is planted and along streams, would make the Plan area more attractive to birds, thus increasing the number of resident and migratory birds in the Plan area.

Glass windows and building façades can result in injury or mortality of birds due to birds' collisions with these surfaces. Birds do not perceive glass as an obstruction the way humans do, therefore they may collide with glass when the sky or vegetation is reflected in glass (e.g., they see the glass as sky or vegetated areas); when transparent windows allow birds to perceive an unobstructed flight route through the glass (such as at corners); and when the combination of transparent glass and interior vegetation (such as in planted atria) results in attempts by birds to fly through glass to reach that vegetation. The greatest risk of avian collisions with buildings occurs in the area within 40 to 60 feet of the ground, because this is the area in which most bird activity occurs. Very tall buildings (e.g., buildings 500 feet or more high) may pose a threat to birds that are migrating through the area, particularly to nocturnal migrants that may not see the buildings or that may be attracted to lights on the buildings.

Future development under the Plan could result in bird collisions, causing injury or death. Considering the size of the Plan area, the number of birds that could be injured or killed over time as a result of increases in façade glazing could be substantial. These collisions could potentially result in the mortality of large numbers of birds relative to the size of regional populations, and enough individuals of common bird species can potentially strike the buildings over the long term to result in a significant impact. The extent of glazing on a building and the presence of vegetation opposite the glazing are known to be two of the strongest predictors of avian collision rates. Further, the greatest risk of avian collisions with glazed façades is in the area within 60 feet of the ground, because this is the area in which most bird activity occurs. Therefore, collision risk with new or renovated buildings is highest within approximately 60 feet of the ground where landscape vegetation occurs adjacent to or opposite extensive areas of glass.

Impact BIO-4: Future development under the Plan could result in bird collisions, causing injury or death.

General Plan Policies that Reduce Impacts from Bird Collisions

In accordance with General Plan Action EM-1.5, future developments would be required to minimize the potential risk of bird collisions through the use of the latest bird-safe design guidelines and best management practices.

- **Action EM-1.5:** Require that new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes.

  Bird safe-design measures and best management practices may include:

  - Avoid the use of highly reflective glass as an exterior treatment, which appears to reproduce natural habitat and can be attractive to some birds,
  - Limit reflectivity and prevent exterior glass from attracting birds in building plans by utilizing low-reflectivity glass and providing other non-attractive surface treatments,
  - Use low-reflectivity glass or other glazing treatments for the entirety of the building's glass surface, not just the lower levels,
  - For commercial buildings, interior light "pollution" should be reduced during evening hours through the use of a lighting control system,
  - Exterior lighting should be directed downward and screened to minimize illuminating the exterior of the building at night, except as needed for safety and security,
  - Glass skyways or walkways, freestanding glass walls, and transparent building corners should not be allowed,
  - Transparent glass should not be allowed at the rooflines of buildings, including in conjunction with green roofs, and

- All roof mechanical equipment should be covered by low-profile angled roofing so that obstacles to bird flight are minimized.

New buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy under the Plan would be required to comply with Action EM-1.5 and incorporate the bird-safe design elements listed in the 2045 General Plan Reset EIR. While compliance with Action EM-1.5 would minimize bird strikes for buildings that are mostly below 40 feet in height, there is still a risk for bird collisions at 40 to 60 feet above the ground. Therefore, in addition, future development exceeding 40 feet under the Plan would implement the following Specific Plan Project Requirements pertaining to bird collisions to account for bird-safe design measures in areas where most collisions occur, at 40-60 feet off the ground.

Bird Collision Project Requirements

- Renovation and redevelopment under the Plan shall implement the following bird-safe building design considerations for all buildings exceeding 40 feet above ground within 300 feet of Belmont Creek or any contiguous open space areas (including other drainages and future open space areas created by the Plan) two acres or larger that are dominated by vegetation or wetland/aquatic habitats:
  - The extent of glass on the façades of new buildings and additions shall be minimized to the extent feasible.
  - No more than 10 percent of the surface area of the façades of buildings (considering all facades combines) shall have untreated glazing between the ground and 60 feet above ground. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, and/or physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Bird-safe glazing shall have the following specifications:
    - Vertical elements of the window patterns will be at least ¼-inch wide at a maximum spacing of 4 inches, or have horizontal elements at least 1/8-inch wide at a maximum spacing of 2 inches; OR
    - Bird-safe glazing shall have a Threat Factor less than or equal to 30.
  - No more than 10 percent of the surface area of any façades directly facing Belmont Creek or any open space areas two acres or larger that are dominated by vegetation or wetland/aquatic habitats, and/or façade areas within 12 vertical feet above and/or below landscaped terraces, shall have untreated glazing.
  - All glazing panels at corners of façades that face Belmont Creek or any open space areas two acres or larger that are dominated by vegetation or wetland/aquatic habitats, between the ground and 60 feet above ground and/or within 12 vertical feet above and/or below landscaped terraces (regardless of their height above ground), shall be 100 percent treated.
  - To reduce reflections of clouds and vegetation in glass and help ensure that bird-safe treatments on the lower surfaces of glass are visible below any reflections, glazing shall have a visible reflectance of 15 percent or lower.

- Glass skyways or walkways, freestanding glass walls, and transparent building corners between the ground and 60 feet above ground and/or within 12 vertical feet above and/or below landscaped terraces (regardless of their height above ground) shall not be allowed, unless the glazing is 100 percent treated.
- Transparent glass should not be allowed at the rooflines of buildings, including in conjunction with green roofs, unless the glazing is 100 percent treated.
- A project may receive a waiver from one or more of the requirements above if a qualified biologist documents that glazing in a particular area will not increase bird collision risk or documents why alternative bird-safe design measures would be at least as effective as the above requirements. Any such waiver must be approved by the City.

With the implementation of the above proposed Specific Plan Project Requirement, as well as compliance with General Plan policies related to biological resources, future development under the Plan would result in less than significant impacts on the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. **(Less than Significant Impact)**

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Buildout under the Plan would result in the removal of trees. All future development would be required to adhere to Section 18.18.070 of the SCMC, which defines significant, protected, and heritage trees and sets forth tree replacement and protection requirements. As a result, the Plan would have a less than significant impact related to conflicts with any local policies or ordinances protecting biological resources. **(Less than Significant Impact)**

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

No habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan applies to the Plan or Plan area. Therefore, Plan implementation would not conflict with any such plan. **(No Impact)**

3.4.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a significant cumulative biological resources impact?

The geographic area for cumulative biological resources impacts includes the Plan area and adjacent parcels, where construction and operation of future development under the Plan could contribute to on- and off-site impacts to biological resources.

Candidate, Sensitive, or Special Status Species

As discussed under checklist question a), the surrounding area is highly urbanized, with the only undeveloped areas consisting of Belmont Creek, the unnamed channels, and their associated riparian habitat. There are no special-status plant species in the Plan area. The Plan would comply with General Plan policies related to migratory nesting birds. Development as a result of the Plan would implement special-status species project requirements for the protection of roosting bats and to reduce impacts from artificial lighting. The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not result in significant cumulative biological resources impacts. Future cumulative projects in the City would be required to adhere to General Plan policies(EM-1.1 and EM-1.2) protecting biological resources. As such, the project would not contribute to a cumulatively significant impact to nesting migratory birds and raptors.

Riparian Habitats, Sensitive Natural Communities, and Wetlands

Buildout of the Plan would not result in direct impacts to Belmont Creek or any other wetland or aquatic habitats. As described in Section 3.10 Hydrology and Water Quality, all development under Plan buildout, as well as cumulative projects in the City, would implement measures to minimize the potential for adverse impacts to water quality during and following construction. Development under the Plan would increase the creek setback from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. These actions would improve the quality of runoff from Plan areas, relative to existing conditions, and would enhance the quality of wetland and aquatic habitats. Therefore, the Plan would not contribute to a cumulatively considerable impact on wetland and aquatic habitats.

Movement, Migration, or Use of Native Wildlife Nursery Sites

Redevelopment under the Plan would not substantially interfere with wildlife movement or migration. Future cumulative development in the Plan area would be required to increase the creek setback from 25 feet to 35 feet for redevelopment along Belmont Creek, and require a natural vegetated buffer along drainage channels for redevelopment activities. Future cumulative development, including development under the Plan, would be required to adhere to General Plan policies to protect biological resources, including Action EM-1.5. To further mitigate impacts due to bird collisions, new development under the Plan exceeding 40 feet in height would be required to

implement bird collision project requirements. With adherence to these policies and requirements, potential cumulative impacts on wildlife movement corridors would be less than significant.

Policies or Ordinances Protecting Biological Resources

Future development under the Plan would comply with policies and ordinances protecting biological resources, specifically those outlined in Section 18.18.070 of the SCMC. Future cumulative development would also be required to comply with the City's requirements to protect trees and provide replacement planting for trees removed. For these reasons, the cumulative projects would not conflict with the City's policies and regulations for tree protection.

Habitat Conservation Plans

Future cumulative development (including the Plan) is not located within an approved local, state, or national habitat conservation plan area. Thus, there would be no cumulative conflict with a Habitat Plan.

With the implementation of project-specific requirements and adherence to existing regulations and General Plan policies and actions, the Plan would not result in a cumulatively considerable contribution to a significant biological resources impact. **(Less than Significant Cumulative Impact)**

3.5 Cultural Resources

The following discussion is based upon an Archaeological Review and Built Environment Resource Reconnaissance prepared by PaleoWest in March 2024. A copy of the report, which is a confidential report, is on file at the City of San Carlos Community Development Department and is available upon request with appropriate credentials.

3.5.1 Environmental Setting

3.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

The NRHP is the nation's master inventory of historic resources that are considered significant at the national, state, or local level. The minimum criteria for determining NRHP eligibility include:

- The property is at least 50 years old (properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the NRHP);
- It retains integrity of location, design, setting, materials, workmanship, feeling, and associations; and
- It possesses at least one of the following characteristics:
    - Association with events that have made a significant contribution to the broad patterns of history;
    - Association with the lives of persons significant in the past;
    - Distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant, distinguishable entity whose components may lack individual distinction; or
    - Has yielded, or may yield, information important to prehistory or history.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and

cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[30]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Section 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Section 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the

[30] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed August 31, 2020. http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

California Health and Safety Code Section 7050.5

The discovery of human remains is regulated by California Health and Safety Code Section 7050.5, which states that:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible…. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

City of San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating cultural resource impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.10	Require that development within the Pulgas, Brittan and Cordilleras Creek watersheds shall preserve watershed integrity, including natural vegetation, soil and slope stability, water quality, scenic values and potential archaeological resources.
LU-12.1	Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.
LU-12.2	Foster the preservation, restoration, and compatible reuse of architecturally and/ or significant structures and sites.
LU-12.3	Ensure that modifications to identified historic resources are consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.

Policy	Description
LU-12.4	Encourage continued use and adaptive reuse of designated historic resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction, and restoration.
LU-12.5	Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California native American Graves Protection and Repatriation Act and other appropriate laws.
LU-12.6	Promote the maintenance, restoration and rehabilitation of historical resources through but not limited to the use of Federal Rehabilitation Tax Credits, State incentives including the Mills Act and the California Cultural and Historical Endowment and the California State Historical Building Code.

San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to cultural resources as follows:

- Chapter 15.04, Technical Building Codes, adopts the 2022 California Historical Building Code as the rules, regulations, and standards within the city as to all matters except as modified or amended in the SCMC.

3.5.1.2 *Existing Conditions*

Archaeological Resources

A records search was completed for the Plan at the Northwest Information Center of the California Historical Resources Information System (CHRIS) on January 10, 2023. The records search involved a review of all recorded resources and cultural resource reports on file for the Plan and a surrounding 0.25-mile buffer. No archaeological resources were identified within the Plan or immediate vicinity. The Sacred Lands File results were negative. However, it is always possible that intact archaeological deposits are present at subsurface levels, especially because the Plan was historically on the bay shore before the area was dredged in the late 1940s.

Historic Resources

The records search identified one historic-period building within the Plan, at 181 Industrial Road. The building was constructed in 1956 and was previously determined not eligible for the NRHP and CRHR. The City does not maintain its own historic register. As part of the Archaeological Review and Built Environment Resource Reconnaissance, historical maps were reviewed to identify potential historic-period (45 years or older) resources within and in the vicinity of the Plan area. The review identified 80 additional buildings that date to the historic period (45 years or older), as summarized in Table 3.5-1Table 3.3-1 below. These buildings have not been previously evaluated for eligibility for the NRHP or CRHR.

Table 3.5-1: Historic Period Buildings in the Plan

Address	APN	Year Built	Age	Building Type
495 Bragato Road	046-052-330	1956	67	Industrial (warehouse)
500 Bragato Road	046-052-280	1952	71	Commercial (warehouse and office space)
501 Bragato Road	046-052-340	1962	61	Industrial (manufacturing)
520 Bragato Road	046-052-280	1952	71	Industrial (warehouse)
535 Bragato Road	046-052-250	1969	54	Industrial (warehouse)
540-560 Bragato Road	046-052-280	1975	48	Commercial (office)
555 Bragato Road	046-052-200	1950	73	Industrial (manufacturing)
565 Bragato Road	046-053-180	1968	55	Industrial (manufacturing)
570 Bragato Road	046-052-280	1952	71	Industrial (warehouse)
110 Glenn Way	046-0533-50	1973	50	Industrial (warehouse)
111 Glenn Way	046-052-220	1966	57	Industrial (warehouse)
120 Glenn Way	046-053-350	1972	51	Industrial (warehouse)
131 Glenn Way	046-052-230	1966	57	Industrial (manufacturing)
161 Glenn Way	046-052-080	1968-1980	43-55	Commercial (office and warehouse)
170 Glenn Way	046-053-290	1974	49	Industrial (warehouse)
195 Glenn Way	046-052-070	1969	54	Commercial (office)
70 Glenn Way	046-053-190	1966	57	Industrial (warehouse)
71 Glenn Way	046-052-260	1967	56	Industrial (warehouse)
80 Glenn Way	046-053-160	1968	55	Industrial (warehouse)
90 Glenn Way	046-053-210	1968	55	Industrial (warehouse)
120 Industrial Road	046-021-080	1957, renovated 1997	66	Industrial (research and development)
150 Industrial Road	046-021-080	1957, renovated 1997	66	Industrial (research and development)
151 Industrial Road	046-020-450, 046-020-460, and 046-020-470	1974	49	Commercial (storage) and adjacent paved easements and parking lot
161 Industrial Road	046-020-120	1952	71	Industrial (warehouse) and rear parking lot
171 Industrial Road	046-020-260 and 046-020-430	1952	71	Commercial (auto body shop)
181 Industrial Road	046-020-300	1956	67	Industrial (warehouse)

Address	APN	Year Built	Age	Building Type
191 Industrial Road	046-020-280 and 046-020-090	1952	71	Commercial (auto sales)
200 Industrial Road	046-022-010	1951	72	Industrial (warehouse and distribution)
210 Industrial Road	046-022-010	1951	72	Commercial (retail complex)
234 Industrial Road	046-022-010	1951	72	Commercial (auto repair)
236 Industrial Road	046-022-010	1951	72	Commercial (auto repair)
242 Industrial Road	046-022-010	1951	72	Commercial (metal manufacturing, auto repair)
244 Industrial Road	046-022-010	1951	72	Commercial (auto repair)
266 Industrial Road	046-052-270	1960	63	Industrial (manufacturing and distribution)
268 Industrial Road	046-052-330	1956	67	Commercial (auto sales)
270 Industrial Road	046-052-040, 046-052-100, 046-052-030, and 046-052-050	1956	67	Industrial (manufacturing)
300 Industrial Road	046-054-190	1969	54	Industrial (manufacturing)
320 Industrial Road	046-054-210	1971	52	Industrial (manufacturing and warehouse)
380 Industrial Road	046-054-390, 046-054-400, and 046-054-250	1975	48	Industrial (warehouse)
380–400 Industrial Road	046-054-400 and 046-054-250	1968	55	Parking lot and access road
389 Industrial Road	046-022-010	1951	72	Industrial (warehouse)
390 Industrial Road	046-054-020	1960	63	Industrial (manufacturing)
400 Industrial Road	046-054-010	1962	61	Industrial (warehouse)
150 Old County Road	046-041-380	1956	67	Industrial (warehouse)
1501 Old County Road	046-040-360	1963	60	Industrial complex containing 643, 645, and 650 Quarry Road)
151 Old County Road	046-041-380	1946-1956	67-77	Industrial (warehouses) and commercial (office)
205 Old County Road	046-040-300	1951	72	Industrial (service)
209 Old County Road	046-040-050	1952	71	Industrial (service)
235 Old County Road	046-053-170	1969	54	Industrial (warehouse)
239 Old County Road	046-053-080	1958	65	Industrial (warehouse and shop)

Address	APN	Year Built	Age	Building Type
243 Old County Road	046-053-070	1958	65	Industrial (warehouse)
247 Old County Road	046-053-060	1964	59	Commercial (retail)
251 Old County Road	046-053-310	1946	77	Commercial (retail)
301 Old County Road	046-054-100	1965	58	Industrial (warehouse) and commercial (retail)
303 Old County Road	046-054-100 and 046-054-090	1965	58	Parking lot adjacent to APN 046-054-100
335 Quarry Road	046-022-010	1951	72	Commercial (office)
345 Quarry Road	046-022-010	1951	72	Industrial (warehouse)
355 Quarry Road	046022010	1951	72	Industrial (warehouse and distribution)
361 Quarry Road	046-022-010	1951	72	Industrial (auto repair)
383 Quarry Road	046-022-010	1951	72	Industrial (auto repair)
385 Quarry Road	046-022-010	1951	72	Industrial (auto repair)
401 Quarry Road	046-040-320	1956	67	Industrial (manufacturing)
403 Quarry Road	046-040-320	1956	67	Industrial (manufacturing)
503 Quarry Road	046-040-320	1956	67	Industrial (warehouse)
591 Quarry Road	046-040-320	1956	67	Industrial complex
595 Quarry Road	046-040-320	1956	67	Parking lot and access road
597 Quarry Road	046-040-320	1956	67	Industrial (warehouse and manufacturing)
610 Quarry Road	046-041-370	1955	68	Industrial (manufacturing)
639 Quarry Road	046-040-370	1965	58	Industrial (auto repair)
642 Quarry Road	046-041-380	1956	67	Industrial (warehouse and office)
643 Quarry Road	046-040-360	1963	60	Industrial (warehouse)
645 Quarry Road	046-040-360	1963	60	Industrial (warehouse)
647 Quarry Road	046-040-360	1963	60	Industrial (auto repair)
541 Taylor Way	046-054-220	1972	51	Industrial (warehouse and office)
551 Taylor Way	046-054-310 and 046-054-260	1962	61	Industrial (warehouse) and parking lot
590 Taylor Way	046-052-110, 046-052-060, and 046-052-090	1960	63	Industrial (warehouse) and parking lot
601 Taylor Way	046-054-120	1964	59	Industrial (warehouse)
611 Taylor Way	046-054-130 and 046-054-510	1977	46	Industrial (warehouse) and parking lot

Address	APN	Year Built	Age	Building Type
620 Taylor Way	046-053-290	1974	49	Industrial (warehouse and manufacturing)
675 Taylor Way	046-054-100	1965	58	Industrial (manufacturing)
551 Taylor Way	046-054-270	1962	61	Commercial (showroom)

Source: PaleoWest. *Results of the Archaeological Literature Review and Built Environment Resource Reconnaissance for the San Carlos Northeast Area Specific Plan, San Mateo County, California*. March 19, 2024.

3.5.2 Impact Discussion

For the purpose of determining the significance of the project's impact on cultural resources, would the project:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
3) Disturb any human remains, including those interred outside of dedicated cemeteries?

3.5.2.1 *Project Impacts*

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

A project could have a significant impact on a historic resource if it would cause a substantial adverse change in the historic significance of that resource. A "substantial adverse change" is defined as the physical demolition, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired.

As discussed in Section 3.5.1.2, there are a total of 81 buildings within and in the vicinity of the Plan area that date to the historic period (45 years or older). The building at 181 Industrial Road was previously determined not eligible for the NRHP and CRHR. The other 80 buildings have not been evaluated and may be eligible for listing in the NRHP or CRHR. In addition, there may be other buildings in the Plan area that are eligible for listing in the NRHP or CRHP.

While the Plan does not propose the removal of any specific buildings including any that have been identified as historic resources, implementation of the Plan would allow for new development and redevelopment over a period of approximately 20 years that could directly or indirectly affect historic resources, including those that have yet to be identified and evaluated.

Impact CUL-1: Future development projects under the Plan could indirectly or directly impact known and unknown historic buildings and structures by removing historic buildings and structures, or altering the setting for historic properties.

General Plan Policies that Reduce Impacts to Historic Resources

Future development projects would comply with the following General Plan policies and actions pertaining to historic resources.

- **Policy LU-12.1:** Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.
- **Policy LU-12.2:** Foster the preservation, restoration and compatible reuse of architecturally and/or historically significant structures and sites.
- **Policy LU-12.3:** Ensure that modifications to identified historic resources are consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties.
- **Policy LU-12.4:** Encourage continued use and adaptive reuse of designated historic resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction and restoration.
- **Policy LU-12.6:** Promote the maintenance, restoration and rehabilitation of historical resources through but not limited to the use of Federal Rehabilitation Tax Credits, State incentives including the Mills Act and the California Cultural and Historical Endowment and the California State Historical Building Code.
- **Action LU-12.1:** Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural and historical resources.

Construction adjacent to a historic resource, in conformance with the Secretary of Interior Standards as required by the General Plan, would have less than significant impacts to the historic integrity of the resources because it would require appropriate treatments to retain the historical significance or physical conditions.

For the purposes of this analysis, because this is a program-level document, it is assumed impacts to historic resources, including as yet identified resources, would be avoided through implementation of General Plan policies (listed above), as well as SCMC Chapter 15.04 (refer to Section 3.5.1.1 Regulatory Framework). If a future project could adversely affect historic resources, supplemental analysis would be required to identify mitigation measures (or alternatives) necessary to reduce the impact to a less than significant level. With the implementation of these policies and actions, future development projects under the Plan would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

As discussed in Section 3.5.1.2 Existing Conditions, no archaeological resources were identified within the Plan or immediate vicinity. However, it is always possible that intact archaeological deposits are present at subsurface levels, especially because the Plan was historically on the bay shore before the area was dredged in the late 1940s.

Impact CUL-2: Future development projects under the Plan could inadvertently discover unknown archaeological resources during construction.

General Plan Policies that Reduce Impacts to Archaeological Resources

- **Policy LU-1.10:** Require that development within the Pulgas, Brittan and Cordilleras Creek watersheds shall preserve watershed integrity, including natural vegetation, soil and slope stability, water quality, scenic values and potential archaeological resources.
- **Policy LU-12.1:** Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.

Compliance with existing federal, State, and local laws and regulations, and General Plan policies LU-1.10 and LU-12.1 would protect archaeological resources in the Plan pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Future development projects under the Plan could directly or indirectly disturb human remains, including those interred outside of dedicated cemeteries during future construction activities. Future development projects would be required to comply with Section 7050.5 of the Health and Safety Code and Section 5097 of the Public Resources Code, as discussed in Section 3.5.1.1 Regulatory Framework. Specifically, Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are determined to be of Native American origin, the county coroner must contact the California NAHC within 24 hours of this identification. An NAHC representative will then identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. In addition, CEQA Guidelines Section 15064.5 specifies the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

Impact CUL-3: Future development projects under the Plan could inadvertently discover human remains during construction.

General Plan Policies that Reduce Impacts to Human Remains

- **Policy LU-12.5:** Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

With the mandatory regulatory procedures and compliance with the General Plan policies discussed above, potential impacts related to the potential discovery or disturbance of any human remains accidentally unearthed during construction activities associated with future development would be less than significant. **(Less than Significant Impact)**

3.5.2.2 *Cumulative Impacts*

a) Would the project result in a cumulatively considerable contribution to a significant cumulative cultural resources impact?

Historic Resources

The geographic area for cumulative impacts to historic resources is Citywide.

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would result in less than significant cumulative impacts to historic resources with continued compliance with existing federal, State, and local regulations and General Plan goals, policies, and actions described in checklist questions a) above.

Archaeological Resources

The geographic area for cumulative impacts to archaeological resources includes parcels in the Plan area and adjacent parcels, where construction and operation of future development under the Plan could contribute to on- and off-site impacts to archaeological resources.

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would result in less than significant cumulative impacts to archaeological resources with continued compliance with existing federal, State, and local regulations and General Plan goals, policies, and actions described in checklist questions b) above.

Human Remains

All cumulative projects would be required to comply with Section 7050.5 of the Health and Safety Code and Section 5097 of the Public Resources Code, as discussed in Section 3.5.1.1 Regulatory

Framework. With the mandatory regulatory procedures and compliance with the General Plan policies discussed above, potential cumulative impacts related to the potential discovery or disturbance of any human remains accidentally unearthed during construction activities associated with cumulative development would be less than significant.

For these reasons, the cumulative projects would not result in significant cumulative impacts to cultural resources. **(Less than Significant Cumulative Impact)**

3.6 Energy

3.6.1 Environmental Setting

3.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022, and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan, identify and recommend measures to achieve these policy goals, and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a

legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years.[31] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[32]

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars II program in 2022 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2026 through 2035. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[33]

Regional and Local

San Carlos Climate Mitigation and Adaptation Plan

The 2021 Climate Mitigation and Adaptation Plan (CMAP) is San Carlos' strategic plan to reduce GHG emissions and to adapt to changing climate conditions. The CMAP allows City of San Carlos decision-makers, staff, and the community to understand the sources and magnitude of local GHG emissions and the impacts of climate change on the community, reduce GHG emissions, prioritize steps to achieve GHG emission-reduction targets, and increase resilience. The CMAP is an update of the 2009 Climate Action Plan (2009 CAP), providing updated information, an expanded set of GHG reduction strategies, climate adaptation strategies, and a planning horizon out to 2050. The City is committed to reducing emissions 40 percent below 1990 levels (equal to 49 percent below 2005 levels) by 2030 and 80 percent below 1990 levels (or 83 percent below 2005 levels) by 2050. The City's CMAP is a qualified GHG reduction strategy pursuant to CEQA Guidelines Section 15183.5, although the 2021 CMAP predates the 2045 General Plan Reset and, therefore, does not address the inventory of emissions associated with the 2045 General Plan Reset, and therefore the General

[31] California Building Standards Commission. "California Building Standards Code." Accessed August 14, 2024. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[32] California Energy Commission (CEC). "2022 Building Energy Efficiency Standards." Accessed August 14, 2024. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency.
[33] California Air Resources Board. "Advanced Clean Cars II." Accessed August 14, 2024. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii

Plan Reset includes an action item for the CMAP to be updated to address the growth in GHG emissions resulting from the buildout of the 2045 General Plan Reset.

If a proposed development within the City of San Carlos is consistent with the emission reduction and adaptation strategies included in the CMAP and the programs are developed as a result of the CMAP, the project would have a less-than-significant impact on climate change and emissions (Public Resources Code Section 21083.3 and CEQA Guidelines Section 15064). The CMAP includes strategies that would support the City's 2030 and 2045 GHG emissions reductions goals; however, the CMAP demonstrates consistency with current legislative reduction targets for 2030 and not the carbon neutrality goal for 2045. In addition, the proposed Plan would facilitate population growth and development beyond what was accounted for in the CMAP, given the 2021 CMAP predates the 2045 General Plan Reset.

3.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,882 trillion British thermal units (Btu) in the year 2022, the most recent year for which this data was available.[34] Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,204 trillion Btu) for residential uses, 17 percent (1,193 trillion Btu) for commercial uses, 22 percent (1,539 trillion Btu) for industrial uses, and 43 percent (2,916 trillion Btu) for transportation.[35] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

In 2023, California produced approximately 90 percent of the electricity it consumed and the rest was imported from outside the state.[36] California's non-carbon dioxide emitting electric generation (from nuclear, large hydroelectric, solar, wind, and other renewable sources) accounted for approximately 54 percent of total in-state generation for 2023.[37] Electricity from natural gas-powered plants makes up 39 percent of the state electricity generation and the remaining seven percent of the state's electricity generation is from nuclear power.

California's total system electric generation in 2023 was approximately 215,623 gigawatt-hours (GWh), which was down two percent from 2022's total generation of approximately 221,703 GWh.[38] In 2022 nonhydroelectric renewables represented the largest portion of the state's electricity sources (at 56 percent). Natural gas generation accounted for more than 44 percent of all electricity generation.[39]

[34] United States Energy Information Administration. "California State Energy Profile." Accessed August 14, 2024. https://www.eia.gov/state/print.php?sid=CA.
[35] Ibid.
[36] Ibid.
[37] U.S. Energy Information Administration. *California State Energy Profile*. Accessed March 21, 2025. https://www.eia.gov/state/print.php?sid=CA#tabs-3
[38] California Energy Commission. "2023 Total System Electric Generation." Accessed March 21, 2025.
[39] Ibid.

Electricity in San Mateo County in 2022 was consumed primarily by the non-residential sector (62 percent), with the residential sector consuming 38 percent. In 2022, a total of approximately 4,177 GWh of electricity was consumed in San Mateo County.[40]

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources. [41,42]

Natural Gas

PG&E provides natural gas services within San Carlos. In 2023, California's natural gas supply came from a combination of in-state production and imported supplies from other western states and Canada.[43] In 2022, San Mateo County used 1.7 percent of the state's total consumption of natural gas.[44]

Fuel for Motor Vehicles

In 2023, California produced 118 million barrels of crude oil and in 2019, 15.4 billion gallons of gasoline were sold in California.[45, 46] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 26.0 mpg in 2022.[47] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon

[40] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed August 14, 2024. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[41] Peninsula Clean Energy. "Frequently Asked Questions." Accessed August 14, 2024. https://www.peninsulacleanenergy.com/faq/.
[42] Peninsula Clean Energy. "Energy Choices." Accessed August 14, 2024. https://www.peninsulacleanenergy.com/energy-choices/.
[43] California Gas and Electric Utilities. 2023 *California Gas Report.* Accessed August 14, 2024. https://www.socalgas.com/sites/default/files/Joint_Biennial_California_Gas_Report_2023_Supplement.pdf.
[44] Ibid.
[45] U.S. Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." February 28, 2023. https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a
[46] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed August 14, 2024. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.
[47] United States Environmental Protection Agency. "The 2023 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." December 2023. https://www.epa.gov/system/files/documents/2023-12/420r23033.pdf.

by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.[48,49]

3.6.2 Impact Discussion

For the purpose of determining the significance of the project's impact on energy, would the project:

1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
3) Result in a substantial increase in demand upon energy resources in relation to projected supplies?

3.6.2.1 *Project Impacts*

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

Construction

Construction associated with future development under the Plan would result in the temporary usage and consumption of electricity to power electric construction equipment, mobile offices, or water delivered to construction sites; gasoline and diesel fuel used for transportation of workers and haul trucks to and from construction sites; and fuel used for operation of off-road equipment. Construction-related energy usage and consumption would be dispersed over the course of the build out period, and would vary based on the level of activity, length of the construction period, specific construction operations, types of equipment, and number of personnel. Since the timing and intensity of the construction activity required for future development projects under the Plan is not yet known, energy consumption during construction of future development cannot be quantified.

For any project, the overall construction schedule and process is designed to be efficient to avoid excess monetary costs. That is, equipment and fuel would not be used wastefully on the project site because of the added expense associated with renting the equipment, maintaining it, and fueling it. Further, the Plan is in an urbanized area in proximity to roadways, construction supplies, and workers, making it more efficient than construction occurring in outlying, undeveloped areas.

[48] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed August 14, 2024. http://www.afdc.energy.gov/laws/eisa.
[49] United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed August 14, 2024. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026.

Therefore, energy consumption by construction of future development would not be wasteful, inefficient, or unnecessary.

Operation

The Plan is currently developed with approximately 2,617,497 square feet of light industrial, office, and institutional uses. There are currently no residential uses within the Plan. Buildout of the Plan would allow for a net increase of 1,890 residential units and 4,508,000 square feet of non-residential uses. Under the Plan, approximately 418,000 square feet of existing uses would be removed to accommodate redevelopment under the Plan.

Once constructed, gasoline would be consumed during those trips by future residents , employees, customers, and visitors relying on internal combustion-powered vehicles, which is anticipated to be primarily light-duty vehicles. Electricity would be consumed by future development to power buildings and those trips using vehicles powered by electricity. Table 3.6-1 below summarizes existing annual energy use and the increase in energy use under the Plan.

Table 3.6-1: Estimated Annual Energy Use

	Electricity Use (kWh/yr.)	Natural Gas Use (kBtu/yr.)	Gasoline (gal./yr.)
A. Existing Conditions	45,908,529	107,352,023	2,353,206[1]
B. Existing Uses to be Removed	(5,248,326)	(15,389,465)	(314,085)[2]
C. Plan (including existing retained uses)	92,285,636	122,802,645	4,186,633[3]
Net Increase [C – (A-B)]	**51,625,433**	**30,840,087**	**2,147,512**

Notes:

[1] The gasoline demand is based on the estimated VMT of 57,418,215 and an average fuel demand of 24.4 mpg.

[2] The gasoline demand is based on the estimated VMT of 102,153,824 and an average fuel demand of 24.4 mpg.

[3] The gasoline demand is based on the estimated VMT of 7,663,679 and an average fuel demand of 24.4 mpg.

Source: Illingworth & Rodkin, Inc. *San Carlos Northeast Area Specific Plan Air Quality and Greenhouse Gas Assessment*. March 2025.

U.S. Department of Energy. "Maps and Data – Average Fuel Economy by Major Vehicle Category." January 2024. https://afdc.energy.gov/data

As shown in Table 3.6-1, buildout of the Plan would result in an increase in electricity use compared to existing conditions. All new development facilitated by the Plan would be required to demonstrate compliance with the California Building Energy Efficiency Standards and CALGreen standards in effect at the time the individual development applications are submitted and can therefore be expected to be more energy-efficient than the use being replaced, resulting in reductions in building electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. In addition, SCMC Chapter 15.04 requires many new construction projects to be designed all-electric; however, it is unknown at this time to what extent

this requirement would be placed on new construction projects due to the varying exceptions that could apply; e.g. federal law preempts a local jurisdiction from banning the use of natural gas.

As shown in Table 3.6-1, buildout of the Plan would result in an increase in natural gas use compared to existing conditions. While the City currently has a reach code requiring all-electric building designs for most new projects (SCMC Section 4.106.5), it cannot be guaranteed that every individual development project facilitated by the proposed project would be subject to this requirement, as federal law preempts a local jurisdiction from banning the use of natural gas. Similar to electricity consumption, all future development would be required to demonstrate compliance with the current California Building Energy Efficiency Standards and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption.

As shown in Table 3.6 1, buildout of the Plan would result in an increase in gasoline consumption compared to existing conditions. As discussed in Section 3.17 Transportation, the Plan is located in a TPA and therefore, future development projects would result in a less than significant VMT impact. Further, as described in Section 2.3.7 of this EIR, all new development in the Plan would be subject to TDM requirements. Consistent with C/CAG's TDM Policy, it is assumed that all new development would achieve a minimum 25 percent vehicle trip reduction.

As documented above, while the Plan would increase electricity and natural gas use and gasoline consumption compared to existing conditions, the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project operation. Further, the following General Plan policies encourage the reduction of nonrenewable energy use and improvement of energy efficiency.

General Plan Policies that Reduce Energy Impacts

- **Policy LU-8.18:** Encourage "green building" practices in new development and redevelopment, such as those that make a building more energy efficient and reduces its effect on human health and the environment through better siting, design, construction, maintenance and operation.
- **Policy EM -9.2:** Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass facilities.
- **Policy EM -9.6:** Encourage new private construction and major remodels to be designed to meet or exceed Green Uniform Building Code requirements.

For the reasons discussed above, the project would not result in a wasteful use of energy. **(Less than Significant Impact)**

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed above under checklist question a), buildout of the Plan would increase consumption of electricity, natural gas, and gasoline. All new development facilitated by the Plan would be required to demonstrate compliance with the California Building Energy Efficiency Standards and CALGreen standards in effect at the time the individual development applications are submitted and can therefore be expected to be more energy-efficient than the use being replaced, resulting in reductions in building electricity consumption on a per dwelling unit and per square foot basis when compared to existing development. Similar to electricity consumption, all future development would be required to demonstrate compliance with the current California Building Energy Efficiency Standards and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption. In addition, all future development would comply with SCMC and the General Plan policies noted above to further reduce energy consumption and improve energy efficiency. While the Plan would result in an increase in demand on existing energy resources, future development under the Plan would be required to comply with applicable regulations and City policies that would conserve energy and water and reduce fuel consumption and waste generation. For these reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. For these reasons, the project would comply with state and local plans for renewable energy and energy efficiency. **(Less than Significant Impact)**

c) Would the project result in a substantial increase in demand upon energy resources in relation to projected supplies?

Electricity

The demand for electricity in California will continue to increase through 2035 due to population growth, climate change, and transportation trends (e.g., increased EV usage). As discussed in Section 3.6.1.2, California's total system electric generation in 2023 was approximately 215,623 GWh. The Plan's increase in energy consumption represents 0.02 percent of the State's total electric generation in 2023. Efficiency and production capabilities, such as SB 100, would help meet increased electricity demand in the future, such as improving energy efficiency in existing and future buildings, establishing energy efficiency targets, inclusion of microgrids and zero-net energy buildings, and integrating renewable technologies.[50] Future development under the Plan would be built to the most recent CALGreen requirements and Title 24 energy efficiency standards, which would improve the efficiency of the growth allowed under the Plan. Also, refer to the discussion under checklist question a) as to why the Plan buildout would not result in wasteful, inefficient, or unnecessary consumption of energy. For these reasons, the Plan buildout's increase in electricity use would not result in a significant increase in demand on electrical energy resources in relation to projected supplies statewide.

[50] California Energy Commission. "2016 Integrated Energy Policy Report." Accessed February 18, 2025. https://ww2.energy.ca.gov/2016_energypolicy/

Natural Gas

Natural gas supply and demand data and reporting is provided at the state level. Statewide natural gas demand is projected to decline at an annual average rate of 1.1 percent per year through 2035, and gas demand will continue to decrease as the state moves towards carbon neutrality by 2045 or sooner.[51] As discussed under checklist question a), all future development would be required to demonstrate compliance with the current California Building Energy Efficiency Standards and CALGreen and would result in reductions in heating fuel (i.e., natural gas or propane) consumption. Therefore, the Plan buildout would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

Fuel for Motor Vehicles

Future trips from development under the Plan would increase gasoline use by approximately 2,147,512 gallons per year compared to existing conditions. This increase is small (less than 0.01 percent) when compared to the 17,121 million gallons of gasoline consumed in California in 2022 for commercial and industrial uses.[52] The project's gasoline use would be reduced given its proximity to existing transit. Furthermore, new automobiles purchased by future employees and residents would be subject to fuel economy and efficiency standards applied throughout the State of California, which means that over time, the fuel efficiency of vehicles associated with the project would improve. In addition, an increasing percentage of new vehicles over the timeframe of Plan buildout are anticipated to be electric. For the above reasons, the project would not result in a significant increase in gasoline demand relative to projected supply. Also, refer to the discussion under checklist question a) as to why the project would not result in wasteful, inefficient, or unnecessary consumption of gasoline. **(Less than Significant Impact)**

3.6.2.2 *Cumulative Impacts*

a) Would the project result in a cumulatively considerable contribution to a significant cumulative energy impact?

By its nature, energy is a cumulative resource. The geographic area for cumulative energy impacts is the state. Past, present, and future development projects contribute to the state's energy impacts. If the project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. As discussed under checklist questions a) through c) above, the project would not result in significant energy impacts. The project would not result in significant cumulative energy impacts. **(Less than Significant Cumulative Impact)**

[51] California Gas and Utilities. *2022 California Gas Report.* Pages 6 and 10.
[52] U.S. Energy Information Administration. "Table F3: Motor gasoline consumption, price, and expenditure estimates, 2022." Accessed February 18, 2025. https://www.eia.gov/state/seds/sep_fuel/html/fuel_mg.html

3.7 Geology and Soils

3.7.1 Environmental Setting

3.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Standards Code

The California Building Code (CBC) prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and

Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

City of San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating geology and soil impacts resulting from planned development within the City including the following:

Policy	Description
ESPS-1.1	The City Building Official shall verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard and appropriate mitigation measures. Based on the findings of these reports, the City shall require that new structures are designed and built to withstand the effects of seismically-induced ground failure.
ESPS-1.2	Prohibit structural development in known areas where seismic and geological hazards cannot be mitigated.
ESPS-1.3	Continue to monitor and enforce mitigation measures to reduce risk for projects where geological and seismic hazards can be mitigated.
ESPS-1.4	Enforce requirements of the Alquist- Priolo Special Studies Zones Act should any fault traces in San Carlos be discovered and prove to be active or potentially active.
ESPS-1.5	Continue to incorporate seismic risk analysis into the City's ongoing building inspection program through thorough review of projects by plan check and field inspections.
ESPS-1.6	Continue to encourage retrofitting of structures, particularly older buildings, to withstand earthquake shaking and landslides, consistent with state Building Codes and Historic Building Codes.
ESPS-1.7	Continue to incorporate geotechnical hazard data into future land use decision- making, site design and construction standards.
ESPS-1.9	Continue to ensure that seismic hazards are mitigated to the greatest extent possible for critical public facilities, infrastructure and emergency services.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to geology and soils as follows:

- Chapter 12.08, Grading and Excavations, requires an interim and final erosion and sediment control plan as part of the grading permit application.
- Chapter 13.04, Sewer Connections, requires all new construction to connect to the City of San Carlos sanitary sewer system. Wastewater from new lots or parcels would be discharged into the existing public sanitary sewer system serviced by the City.
- Chapter 15.04, Technical Building Code, of Title 15, Buildings and Construction, adopts the CBC by reference with specified modifications. Chapter 15.04 recognizes that the city is located in a seismically active area very close to the San Andreas Fault, one of the most significant earthquake fault zones in the State of California. This chapter also recognizes that there is the moderate potential for erosion and slope instability/landslides in approximately fifty percent of the city and that expansive soils or bedrock varies in significance in over two-thirds of the entire city. The city limit and Sphere of Influence (SOI) are in CBC Seismic Zone 4, as is about 45 percent of the State of California; consequently, construction within San Carlos would be required to meet the most stringent building code standards. Seismic zone designations range from zone 0 to zone 4. The ascending numbers indicate the respective increase in the required factor of safety applied to structural design equations for resisting earthquake-induced ground accelerations.
- Chapter 12.08, Grading and Excavations, of Title 12, Streets, Sidewalks, and Public Places, provides the minimum standards to protect property, preserve natural beauty and enhance water quality, and control erosion, sedimentation, increases in surface runoff and related environmental damage caused by construction-related activities, by regulating and controlling the design, construction, quality of materials, use, location and maintenance of grading, excavating and fill, land disturbances, land fill and soil storage in connection with the clearing and grading of land for construction, within the city.
- Chapter 17.36, Improvements, explains that sanitary sewer facilities connecting with the existing City sewer system shall be installed to serve each lot and to grades, location, design and sizes approved by the City Engineer.

San Carlos Soil Hazard Zones

The City of San Carlos has two Soil Hazard Areas: Zone A and Zone B. Zone A is generally located in the flat lying topographic areas and Zone B is located in the hillier areas of San Carlos. Each Soil Hazard Area can determine how foundations are designed and, depending on the type of project, if a geotechnical investigation report is required. If a geotechnical investigation report is required, a foundation plan review letter is required to be submitted to the City prior to permit issuance. If a project is occurring in Hazard Zone B, an engineering geologic investigation/report may be required by the City geologist.

3.7.1.2 *Existing Conditions*

Regional and Site Geology

San Carlos is located on the San Francisco Peninsula, which is set within the larger Coast Ranges Geomorphic Province. This province is characterized by northwest-southeast trending mountain ranges that stretch from the Oregon border on the north to Point Conception on the south. The City is underlain by Holocene-age coarse-grained alluvium.[53]

The geology within San Carlos is mainly unconsolidated sedimentary deposits underlain by sedimentary rock.[54] The lowland deposits, which underlie most of San Carlos, consist mostly of the deposits of Holocene age alluvium (less than 11,000 years old) consisting of a mix of clay, silt, sand, and gravel. Some older Pleistocene age deposits are also present, but with similar compositions. In the east parts of the City, the surface deposits are artificial fill consisting of a mix of gravel, sand, Bay mud, broken concrete, cement, asphalt, and solid waste, as much as ten feet thick.

Groundwater

Groundwater levels can fluctuate temporally due to a variety of factors, including seasonal variations in precipitation and temperature, and rates of groundwater extraction in the surrounding area. Shallow groundwater is typically encountered in San Carlos at depths ranging from 4 to 8 feet below ground surface (bgs).[55]

Seismic and Seismic-Related Hazards

Earthquake Faults

The Plan is located within the seismically active San Francisco Bay region and within the general vicinity of three known major active faults. These faults include the San Andreas Fault, located approximately 3.9 miles to the west; the Calaveras Fault, 21.8 miles to the east; and the Hayward Fault, 14.3 miles to the east.[56] The Plan is not within an Alquist-Priolo Earthquake Fault Zone. [57]

Liquefaction and Lateral Spreading

Liquefaction is a temporary loss of shear strength as a result of increased pore pressure due to strong ground shaking or cyclic loading. Liquefaction is defined by saturation of soil and loss of

[53] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report.* January 2025.
[54] Ibid.
[55] Ibid.
[56] USGS. *Interactive Fault Map.* Accessed August 29, 2024. https://www.usgs.gov/programs/earthquake-hazards/faults
[57] California Department of Conservation. *Earthquake Zones of Required Investigation.* Accessed August 29, 2024. https://maps.conservation.ca.gov/cgs/EQZApp/app/

cohesion. It is associated with loose, high-plasticity soils and near-surface groundwater levels. The Plan is mapped within a state-designated Liquefaction Hazard Zone.[58]

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying soil toward an open or "free" face such as an open body of water, channel, or excavation. This movement is often associated with liquefaction and commonly occurs on gentle slopes in seismically active regions. Lateral spread presents a significant hazard to the integrity of buildings and other structures. The Plan is predominately flat and would not be highly susceptible to lateral spreading. However, parcels adjacent to Belmont Creek and/or unnamed drainage channels could be at risk for lateral spreading.

Landslides and Land Subsidence

Landslides are downward and outward movements of slope-forming materials which may be rock, soil, artificial fill, or combinations of such materials. The Plan is not mapped within a state-designated Landslide Zone.[59]

Subsidence problems exist in the diked baylands because of the highly compressible nature of the existing fill. Areas susceptible to earthquake-induced settlement include those areas underlain by thick layers of colluvial material or un-engineered fill. Land subsidence occurred within the low-lying areas, mainly along the Bay margins.

Expansive Soils

Expansive soils contain higher levels of clay which expand and shrink depending on water content, which can present hazards for structures that are not appropriately engineered. There are no expansive soils mapped within the Plan.[60]

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments in geologic strata. Most of the City is underlain by Holocene-age coarse-grained alluvium. Holocene age alluvium (less than 11,000 years old) consisting of a mix of clay, silt, sand, and gravel has a low potential to contain significant nonrenewable paleontological resources. Some older Pleistocene age deposits are also present, which have a high potential to contain paleontological resources. In the east parts of the City (including the Plan), the surface deposits are artificial fill consisting of a mix of gravel, sand, Bay mud, broken concrete, cement, asphalt, and solid waste, as much as ten feet thick.

[58] California Department of Conservation. *Earthquake Zones of Required Investigation.* Accessed August 29, 2024. https://maps.conservation.ca.gov/cgs/EQZApp/app/
[59] Ibid.
[60] City of San Carlos. *San Carlos General Plan.* November 2022. Figure 8-7: Expansive Soils.

3.7.2 Impact Discussion

For the purpose of determining the significance of the project's impact on geology and soils, would the project:

1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?
    - Strong seismic ground shaking?
    - Seismic-related ground failure, including liquefaction?
    - Landslides?
2) Result in substantial soil erosion or the loss of topsoil?
3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

3.7.2.1 *Project Impacts*

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Fault Rupture

As discussed in Section 3.7.1.2 Existing Conditions, the Plan is not within an Alquist-Priolo Earthquake Fault Zone nor is there evidence of any fault traces in the Plan area.[61] While existing faults are located somewhat near the site, such as the San Andreas Fault (3.9 miles) and Hayward

[61] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report.* January 2025.

Fault (14.3 miles), the proposed project is outside of the fault zones, and significant impacts from fault ruptures would not occur.

Seismic Ground Shaking

As discussed in Section 3.7.1.2 Existing Conditions, the Plan is located in a seismically active region. It can be reasonably anticipated that future development projects in the Plan would experience strong ground shaking during its lifetime. Strong ground shaking from seismic activity could damage structures and infrastructure. Conformance with the CBC would reduce impacts to new development associated with strong seismically induced ground shaking to the maximum extent practicable, under currently accepted engineering practices. The CBC sets forth structural design parameters for buildings to withstand seismic shaking without substantial structural damage. Section 1803 of the CBC requires preparation of a site-specific geotechnical investigation to assess the degree of potential seismic hazards and recommend appropriate design/mitigation measures. The 2022 CBC contains standards and regulations relating to seismic safety and construction standards for building foundations. Conformance with the CBC, as required by State law, would minimize the potential for damage of new structures and their foundations.

Liquefaction

As discussed in Section 3.7.1.2 Existing Conditions, the Plan is mapped within a state-designated Liquefaction Hazard Zone. In accordance with General Plan Policy ESPS-1.1, future development projects under the Plan would be required to prepare geotechnical and soils reports for development in areas where potentially serious geologic risks exist (i.e., liquefaction).

Impact GEO-1: Future development under the Plan could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction.

General Plan Policies that Reduce Impacts from Liquefaction

- **ESPS-1.1:** The City Building Official shall verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard and appropriate mitigation measures. Based on the findings of these reports, the City shall require that new structures are designed and built to withstand the effects of seismically-induced ground failure.

Compliance with General Plan Policy ESPS-1.1 and the CBC would ensure that implementation of the Plan would not cause substantial adverse effects associated with liquefaction.

Landslides

The Plan is generally flat and not mapped within a state-designated Landslide Zone, making the risk of seismically induced landsliding low. Therefore, future development under the Plan would not cause substantial adverse effects associated with landslides.

Compliance with the CBC, SCMC, and General Plan goals, policies, and action would ensure that the future development under the Plan would not directly or indirectly cause substantial adverse effects, including loss, injury, or death from fault rupture, seismic-related ground shaking or ground failure, or landslides. **(Less than Significant Impact)**

b) Would the project result in substantial soil erosion or the loss of topsoil?

Most of the Plan area is developed and level, which limits the potential for substantial soil erosion. The potential for erosion would be highest during the grading and excavation for future development projects. Ground-disturbing activities could increase the exposure of on-site soils to wind and water erosion. Consistent with the requirements of the SCMC, future development projects would be required to prepare erosion and sediment control plans to reduce soil erosion during grading. Further, future development projects greater than one acre would prepare a Storm Water Pollution Prevention Plan (SWPPP), which specifies best management practices for temporary erosion control, which would reduce the potential for erosion during construction activities. Therefore, because future development under the Plan is anticipated to occur as infill and redevelopment in urban areas, development is not likely to result in substantial soil erosion or loss of topsoil. Adherence to existing regulatory requirements that include, but are not limited to, the SCMC and NPDES General Construction Permit, would ensure that impacts associated with substantial erosion and loss of topsoil from future development would be less than significant. **(Less than Significant Impact)**

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

As discussed in Section 3.7.1.2 Existing Conditions, the Plan area is generally flat and not mapped within a state-designated Landslide Zone, making the risk of seismically induced landsliding low. As noted above, parcels adjacent to Belmont Creek and/or unnamed drainage channels could be at risk for lateral spreading. The Plan is mapped within a state-designated Liquefaction Hazard Zone. As discussed under checklist question a), the CBC requires preparation of site-specific geotechnical investigation reports and implementation of the identified recommendations in those reports to avoid and minimize seismic and seismic-related hazards. Further, General Plan Policy ESPS-1.1 requires preparation of a geotechnical and soils report where potentially serious geologic risks exist.

Compliance with the CBC, SCMC, and General Plan goals, policies, and action would ensure that the future development under the Plan would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?

As discussed in Section 3.7.1.2 Existing Conditions, the Plan is not underlain by expansive soils. Regardless, future development projects within the Plan would comply with the CBC and prepare site-specific geotechnical investigations, which would take into account the expansive soils underlying the development site and implement the identified recommendations for building design and engineering practices that address potential impacts from expansive soils. Future development, therefore, would not exacerbate existing conditions related to expansive soils. **(Less than Significant Impact)**

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

SCMC Chapter 13.04 requires all new construction to connect to the City of San Carlos sanitary sewer system. Wastewater from new development in the Plan would be discharged into the existing public sanitary sewer system serviced by the City and treated at the Silicon Valley Clean Water facility in Redwood Shores. SCMC Chapter 17.36 also requires sanitary sewer facilities that connect to the existing City sewer system be installed to serve each lot and to grades, location, design, and sizes approved by the City Engineer. Therefore, implementation of the Plan would not require the use of septic tanks or alternative wastewater disposal systems. **(No Impact)**

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

The 2045 General Plan Reset EIR concluded that geological formations in the City have the potential to contain unique paleontological resources. However, the surface deposits in the Plan are likely artificial fill consisting of a mix of gravel, sand, Bay mud, broken concrete, cement, asphalt, and solid waste, as much as ten feet thick.

Compliance with California Public Resources Code Section 5097.5 would ensure that any identified paleontological site or feature are not removed from public lands without the permission of the jurisdictional agency.

Future ground-disturbing construction activities (e.g., grading and excavation) associated with future development in the Plan could uncover fossilized remains of organisms from prehistoric

environments that have not been recorded. According to the 2045 General Plan Reset EIR, adherence to the Society of Vertebrate Paleontology's standards and protocols would ensure the protection of unique paleontological resources during construction of future development. Such protocols include, but are not limited to:

- Excavations within a 50-foot radius of the find shall be temporarily halted or diverted.
- Ground-disturbance work shall cease until a City-approved, qualified paleontologist determines whether the resource requires further study.
- The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995) as appropriate, evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find.
- If is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The excavation plan shall be submitted to the City of San Carlos for review and approval prior to implementation.
- All construction activities shall adhere to the recommendations in the excavation plan.

Consistent with the 2045 General Plan Reset EIR, compliance with PRC Section 5097.5 would ensure the protection of unique paleontological resources during construction of future development projects under the Plan. **(Less than Significant Impact)**

3.7.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact?

The geographic area for cumulative geologic impacts is the Plan and surrounding areas because it is assumed that the effects of ground disturbing activities would be limited to the Plan and surrounding sites. Future cumulative development would be subject to regulations pertaining to seismic safety, including the CBC and SCMC. Compliance with these requirements would, to the maximum extent practicable, reduce cumulative, development-related impacts that pertain to seismic shaking, seismic-related ground failure, seismically induced landslides, soil erosion, and unstable soils. Similarly, compliance with relevant CBC and SCMC requirements would minimize the cumulative impacts associated with substantial erosion or loss of topsoil. Lastly, future cumulative development would be required to comply with California Public Resources Code Section 5097.5 to ensure the protection of unique paleontological resources during construction. Therefore, the proposed project would not result in a cumulatively considerable impact to geology and soils and cumulative impacts would be less than significant. **(Less than Significant Cumulative Impact)**

3.8 Greenhouse Gas Emissions

The following discussion is based, in part, on an Air Quality and Greenhouse Gas Assessment completed by Illingworth & Rodkin, Inc. dated April 4, 2025. This report is included as Appendix B to this EIR.

3.8.1 Environmental Setting

3.8.1.1 *Background Information*

GHGs are gases that trap heat in the atmosphere and regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities (anthropogenic). Natural and anthropogenic sources of GHGs are generally as follows:

- CO_2 exchange between the atmosphere, ocean, and land surface
- CO_2, CH_4, and N_2O are emitted from wildfires and volcanic eruptions
- CO_2 and N_2O are byproducts of fossil fuel combustion
- N_2O is associated with agricultural operations such as fertilization of crops
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty
- HFCs are now used as a substitute for CFCs in refrigeration and cooling
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. Per the 2022 Scoping Plan from CARB, atmospheric concentrations of CO_2 have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year, which will result in increased global temperatures.[62] The climates within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and loss of plant and animal species could

[62] CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 3.

also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

3.8.1.2 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to accelerate 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.[63] The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

[63] CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. December 2022. Page 5.

Senate Bill 375 and Plan Bay Area 2050

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the MTC partnered with ABAG, the Bay Area Air District, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050.

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified priority development areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[64]

Play Bay Area 2050 includes a goal to increase the number of households that live within 0.5 mile of frequent transit by 2050. Plan Bay Area 2050 promotes strategies that support active and shared modes, combined with a transit-supportive land use patterns, which together are forecasted to lower the share of Bay Area residents that drive to work alone from 50 percent in 2015 to 33 percent in 2050, resulting in a decrease in GHG emissions. Plan Bay Area 2050 also provides a path to emissions reductions via goals to expand TDM initiatives that support and augment employers' commute programs.

SB 100

SB 100, known as The 100 Percent Clean Energy Act of 2018, was adopted on September 10, 2018. The overall goal is to have all retail electricity sold in California be procured from 100 percent renewable and zero-carbon resources by the year 2045. SB 100 also modified the renewables portfolio standard to 50 percent by 2025 and 60 percent by 2030.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved on September 16, 2022 and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG

[64] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

Advanced Clean Cars II Regulation

To continue reducing air pollutants and GHG emissions in the transportation sector, CARB adopted the Advanced Clean Cars II Regulations (Resolution 22-12) on August 25, 2022. The new regulation requires that by 2035 all new passenger cars, trucks, and SUVs sold in California will be zero-emission vehicles. This regulation bans the sale of new gasoline or diesel passenger cars, trucks, and SUVs in California from automakers. Beginning in 2026, 35 percent of new vehicle sales must be zero-emission vehicles and plug-in hybrid EVs and that percentage will increase per year. By 2030, 70 percent of new vehicle sales will be zero-emissions vehicles and by the 2035 model year 100 percent of new vehicle sales will be zero-emissions. CARB will limit the use of plug-in hybrid EVs in the percentage requirements to keep the manufacturing of zero-emissions as the primary goal. Existing gasoline cars can continue to be driven and sold as used cars beyond 2035. CARB is required to track and report on the zero-emissions vehicle market development annually.

California Building Standards Code – Title 24 Part 11 and Part 6

The CALGreen Code is part of the California Building Standards Code under Title 24, Part 11.[65] The CALGreen Code encourages sustainable construction standards that incorporate planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2022 CALGreen Code) was effective as of January 1, 2023.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by cities during the planning and building permit process. The 2022 Energy Code replaced the 2019 Energy Code as of January 1, 2023. There are new 2022 standards for single-family residences, multi-family

[65] Refer to https://www.dgs.ca.gov/BSC/CALGreen.

residences, and non-residential uses.[66,67,68] Major changes include electric-ready single-family and multi-family residence and solar photovoltaic systems and energy storage systems for residential and commercial developments.

Requirements for EV charging infrastructure are set forth in Title 24 of the California Code of Regulations and are regularly updated on a three-year cycle. The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The 2022 CALGreen standards require deployment of additional EV chargers in various building types, including multi-family residential, hotel, and non-residential land uses. They include requirements for both EV capable parking spaces and the installation of EV supply equipment for multi-family residential and nonresidential buildings. The 2022 CALGreen standards also include requirements for both EV readiness and the actual installation of EV chargers.

CALGreen also requires new construction and demolition projects to have a diversion of at least 65 percent of the construction waste generated.

Regional and Local

2017 Clean Air Plan

To protect the climate, the 2017 Clean Air Plan prepared by BAAQMD includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

Bay Area Air District CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the Bay Area Air District Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes the Bay Area Air District's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds replace the GHG thresholds set forth in the May 2017 Bay Area Air District CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

[66] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Single-Family Residential." Revised July 15, 2022. Accessed August 28, 2024. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Single-family_Whats_New_Summary_ADA.pdf.
[67] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Multifamily." Revised August 4, 2022. Accessed August 29, 2024. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Multifamily_Whats_new_Summary_ADA.pdf.
[68] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Nonresidential." Revised August 4, 2022. Accessed August 29, 2024. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Nonresidential_Whats_New_Summary_ADA.pdf.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating greenhouse gas impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.8	As San Carlos' Climate Action Plan is updated over time, continue to include land use goals and measures in the Plan that contribute to a reduction in greenhouse gas emissions.
LU-8.18	Encourage "green building" practices in new development and redevelopment, such as those that make a building more energy efficient and reduces its effect on human health and the environment through better siting, design, construction, maintenance and operation.
EM-7.3	Participate in regional, State and federal efforts to reduce greenhouse gas emissions and mitigate the impacts resulting from climate change.
EM-7.6	Support greenhouse gas (GHG) emission reduction measures and climate change resiliency strategies that are cost effective and help create an environmentally sustainable, livable and equitable community. The cost of implementation to the City and the private sector shall be considered prior to the adoption of any GHG reduction strategy.
EM-9.2	Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass facilities.
EM-9.5	Design all new construction and major remodels of government agency buildings to relevant green building standards.
EM-9.6	Encourage new private construction and major remodels to be designed to meet or exceed Green Uniform Building Code requirements.
EM-9.7	Implement energy efficiency in City-owned and -operated facilities to reduce municipal energy costs and serve as a model for the community.

San Carlos Climate Mitigation and Adaptation Plan

The 2021 CMAP is San Carlos' strategic plan to reduce GHG emissions and to adapt to changing climate conditions. The CMAP allows City of San Carlos decision-makers, staff, and the community to understand the sources and magnitude of local GHG emissions and the impacts of climate change on the community, reduce GHG emissions, prioritize steps to achieve GHG emission-reduction targets, and increase resilience. The CMAP is an update of the 2009 Climate Action Plan (2009 CAP), providing updated information, an expanded set of GHG reduction strategies, climate adaptation strategies, and a planning horizon out to 2050. The City is committed to reducing emissions 40 percent below 1990 levels (equal to 49 percent below 2005 levels) by 2030 and 80 percent below 1990 levels (or 83 percent below 2005 levels) by 2050. The 2021 CMAP relied on growth assumptions from the California Department of Finance and ABAG.[69]

[69] The CMAP assumed a service population (jobs plus population) of 69,040 by 2050. The 2045 General Plan Reset EIR assumes a service population of 93,770 by 2045.

The CMAP is intended to be a 'qualified' Climate Action Plan as defined in the Air District Guidelines. However, the 2021 CMAP predates the 2045 General Plan Reset and, therefore, does not address the inventory of emissions associated with the 2045 General Plan Reset, and therefore the General Plan Reset includes an action item for the CMAP to be updated to address the growth in GHG emissions resulting from the buildout of the 2045 General Plan Reset. If a proposed development within the City of San Carlos is consistent with the emission reduction and adaptation strategies included in the CMAP and the programs are developed as a result of the CMAP, the project would have a less-than-significant impact on climate change and emissions (Public Resources Code Section 21083.3 and CEQA Guidelines Section 15064). The CMAP includes strategies that would support the City's 2030 and 2045 GHG emissions reductions goals; however, the CMAP demonstrates consistency with current legislative reduction targets for 2030 and not the carbon neutrality goal for 2045. In addition, the proposed Plan, which implements growth planned for the Plan area as set forth in the 2045 General Plan Reset, would facilitate population growth and development beyond what was accounted for in the 2021 CMAP.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to GHG emissions as follows:

- Chapter 8.60, Mandatory Organic Waste Disposal Reduction, list requirements for organic waste generators, in compliance with state recycling laws, state organic recycling laws, and Short-Lived Climate Pollutant Reduction Act of 2016 to reduce solid waste generated in their jurisdictions.
- Chapter 15.20, Streamlined Permitting Process for Electric Vehicle Charging Stations, promotes the use of electric vehicles by creating an expedited, streamlined permitting process for electric vehicle charging stations while promoting public health and safety on the installation and use of such charging stations.
- Chapter 15.16, Streamlined Permitting Process for Small Residential Rooftop Solar Systems, allows for an expedited, streamlined solar permitting process that complies with the Solar Rights Act and AB 2188 to achieve timely and cost-effective installations of small residential rooftop solar energy systems.
- Chapter 15.04, Technical Building Codes, adopts the Title 24, Part 6, the California Energy Code (2022 Edition) and Title 24, Part 11, CALGreen. Within this code, certain regulations are outlined about electric vehicle charging stations (EVCS) and how Electric vehicle supply equipment shall be installed in accordance with the CALGreen. Additionally, this code amends CALGreen Chapter 4, Residential Mandatory Measures, and Chapter 5, Nonresidential Mandatory Measures, to require all-electric buildings for new construction and qualifying alteration projects. If either of these criteria are met within a three-year period, measured from the date of the most recent previously obtained permit final date, the project shall be subject to the all-electric buildings requirements. Exceptions include:

- All residential buildings except Multi-Unit Residential buildings as defined by SCMC Section 18.40.020 may contain non-electric indoor and outdoor Cooking Appliances and indoor and outdoor Fireplaces.
- If an applicant establishes by substantial evidence that an All-Electri**c** Building is infeasible for the project due to exceptional or extraordinary circumstances particular to the project, then the Building Official may grant a modification. The design professional shall submit findings demonstrating a unique reason that makes the technical code impractical, that the modification is in conformity with the intent and purpose of the technical code, the modification shall be as narrow as possible so as to effectuate as much of a reduction in natural gas as possible, and that such modification does not lessen health, life safety, and fire safety requirements or any degree of structural integrity. If the Building Official grants a modification pursuant to this Exception, the applicant shall comply with Section 4.106.5.2.
- If the applicant establishes that there is not an all-electric prescriptive compliance pathway for the building under the California Building Energy Efficiency Standards, and that the building is not able to achieve the performance compliance standard applicable to the building under the Energy Efficiency Standards using commercially available technology and an approved calculation method, then the local enforcing agency may grant a modification. The applicant shall comply with Section 4.106.5.2.
- Laboratory areas with Non-Residential Buildings may contain non-electric Space Conditioning Systems. To take advantage of this exception, an applicant shall provide third party verification that the All-Electric space heating requirement is not cost effective and feasible. If the Building Official grants a modification pursuant to this Exception, the applicant shall comply with Section 5.106.1.3.2.
- Non-residential buildings containing a for-profit restaurant open to the public or an employee commercial kitchen containing cooking facilities with the purpose of preparing and serving food for employees and visitors may apply to the Building Official for a modification to install gas-fueled cooking appliances. This exception does not apply to typical employee breakrooms or other self-service kitchens. This request must be based on a business-related reason to cook with a flame that cannot be reasonably achieved with an electric fuel source
- 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, then the Building Official may grant a modification. The design professional shall submit findings demonstrating a unique reason that makes the technical code impractical, that the modification is in conformity with the intent and purpose of the technical code, the modification shall be as narrow as possible so as to effectuate as much of a reduction in natural gas as possible, and that such modification does not lessen health, life safety, and fire safety requirements or any degree of structural integrity. If the Building Official grants a modification pursuant to this Exception, the applicant shall comply with Section 5.106.1.3.2.
- If the applicant establishes that there is not an all-electric prescriptive compliance pathway for the building under the California Building Energy Efficiency Standards, and that the building is not able to achieve the performance compliance standard

applicable to the building under the Energy Efficiency Standards using commercially available technology and an approved calculation method, then the local enforcing agency may grant a modification. The applicant shall comply with Section 5.106.1.3.2.

- Chapter 18.18, Landscaping, preserves, maintains, and provides regulations of trees for the health and welfare of the City; provide habitat; counteract the pollutants in the air; and maintain the climatic balance.
- Chapter 18.25, Transportation Demand Management, aims to reduce amount of traffic generated by new development and promotion of more efficient utilization of existing transportation facilities.

3.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns.

Emissions associated with existing uses in the City emit 510,296 metric tons (MT) of carbon dioxide equivalent (CO_2e) from the residential, commercial, industrial, transportation, waste, water, and municipal sectors.[70] This equates to 9.9 $MTCO_2e$ per service population.

The Plan area is developed with a mix of office, research and development, lighting industrial and warehousing uses. There are no housing units within the Plan area currently. Most of the GHG emissions associated with the existing uses on-site result from the production of electricity and burning of natural gas to power the buildings for lighting, heating, and cooling, and the emissions from vehicles traveling to and from the sites.

3.8.2 Impact Discussion

For the purpose of determining the significance of the project's impact on greenhouse gas emissions, would the project:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

3.8.2.1 *Thresholds of Significance*

The threshold of significance for plans (e.g., General Plans, Climate Action Plans, and similar long-term community wide plans) is to meet the state's goals to reduce emissions to 40 percent below

[70] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.

1990 levels by 2030 and carbon neutrality by 2045 or be consistent with a local GHG reduction strategy that meets the criteria under CEQA Guidelines Section 15183.5(b).

The threshold of significance for land use development projects is to either A) incorporate project design elements and achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan or B) be consistent with a local GHG reduction strategy that meets the criteria of CEQA Guidelines Section 15183.5 (b). Table 3.8-1 below summarizes the GHG thresholds for plans and land use projects.

Table 3.8-1: Bay Area Air District GHG Significance Thresholds

Plan-Level Thresholds
A. Meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or
B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).
Project-Level Thresholds
A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b)of the State CEQA Guidelines. 2. Transportation a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts. b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.; or
B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

3.8.2.2 *Project Impacts*

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Construction GHG emissions estimates are not included as part of this analysis due to the speculative nature and lack of a Bay Area Air District or industry-standard model for calculating emissions on a program-level basis. In addition, neither the City nor the Bay Area Air District have an adopted threshold of significance for construction related GHG emissions. The Bay Area Air

District encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable, including using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment for at least 15 percent of the fleet, using local building materials of at least 10 percent, and recycling or reusing at least 65 percent of construction waste or demolition materials.

Future redevelopment under the Plan would comply with CALGreen and the City's construction and demolition waste diversion regulations to recycle or reuse at least 60 percent of the future projects' nonhazardous waste. For these reasons, future projects would result in less than significant construction GHG emissions.

Operation

Long-term operational GHG emissions from the build out of the Plan would result from area emissions (i.e., emissions from architectural coatings), energy consumption, mobile emissions from vehicles traveling to and from the Plan area, and emissions from solid waste generation and water usage.

The CalEEMod model was used to estimate daily emissions associated with operation of the fully implemented Plan upon buildout in 2045. the net increase in annual GHG emissions resulting from operation of the Plan Area is estimated to be 28,664 MT of CO_2e.

The primary sources of GHG emissions are from vehicle travel, energy consumption, and solid waste. The modeling results using CalEEMod do not incorporate the effect of CMAP strategies and future regulations that would reduce GHG emissions. For example, CalEEMod results are based on regulations in place in 2020 for on-road vehicles and current emission rates of electricity providers. Under new State laws and CMAP strategies, these emissions are anticipated to decrease substantially beyond those levels predicted by CalEEMod. However, emissions may increase under the Plan because there would be more workers and residents in the area. Redevelopment in the Plan would also lead to an increase in vehicle emissions due to the increase in vehicle travel. While the Plan is considered a transit supportive project that is presumed to have a less-than-significant impact on VMT, the amount of expected growth would increase vehicle travel over existing levels by approximately 203 percent.

GHG emissions associated with energy consumption would increase. The level of this increase would depend on whether new projects are constructed all electric or include natural gas appliances. The CalEEMod modeling assumed new residential uses would be electrified. Commercial and industrial uses were assumed to use natural gas.

Solid waste generation is anticipated to increase due to the increased population supported by the Plan. CalEEMod emissions associated with solid waste are likely overestimated as various programs are designed to reduce solid waste and reduce emissions from solid waste transport and land fill. The CalEEMod model does not consider these future reductions in emissions.

Plan-Level Impact

Pursuant to the Bay Area Air District thresholds (refer to Section 3.8.2.1), to have a less than significant GHG impact, the Plan must meet the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and maintain a path to achieve carbon neutrality by 2045 (Threshold 1) or be consistent with a local GHG reduction strategy (Threshold 2). The City has adopted a local GHG reduction strategy (CMAP) that meets the State CEQA Guidelines Section 15183.5(b). As noted above, the CMAP includes strategies that would support the City's 2030 and 2045 GHG emissions reductions goals; however, the CMAP demonstrates consistency with current legislative reduction targets for 2030 and not the carbon neutrality goal for 2045. In addition, the proposed Plan, which implements growth planned as part of the 2045 General Plan Reset, would facilitate population growth and development beyond what was accounted for in the CMAP, which was based upon growth assumptions from the California Department of Finance and ABAG.[71] Therefore, the 2045 General Plan Reset EIR includes Mitigation Measure GHG-1, which directs the City to update the CMAP within three years of certification of the Final EIR. Consistent with the 2045 General Plan Reset EIR, development under the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.

Impact GHG-1: Implementation of the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.

The 2045 General Plan Reset EIR committed the City to implement the following mitigation measure. The General Plan Reset EIR concluded that implementation of Mitigation Measure GHG-1 would ensure that the City prepares a CMAP update to chart a trajectory to achieve the long-term year 2045 GHG reduction goal and State's carbon neutrality goal set by AB 1279. However, given the growth in population and employment within the City and the magnitude of GHG emissions reductions needed to achieve the GHG reduction target, it is unknown at this time whether targets contained in the future CMAP update will be achieved and therefore GHG emissions are considered significant and unavoidable.

General Plan Mitigation Measures

- **Mitigation Measure GHG-1:** The City of San Carlos shall prepare an update to its Climate Mitigation and Adaptation Plan (CMAP) to chart a trajectory to achieve the long-term GHG reduction goal set by AB 1279. The updated CMAP shall be completed within three years of certification of the General Plan EIR. The updated CMAP shall be updated every five years to ensure the City is monitoring the CMAP's progress toward achieving the City's GHG reduction target(s), and the City shall amend the CMAP if it is not achieving such targets.

[71] The CMAP assumed a service population (jobs plus population) of 69,040 by 2050. The 2045 General Plan Reset EIR assumes a service population of 93,770 by 2045.

The CMAP update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CMAP update.

The CMAP update shall include the following:

- GHG inventories of existing and forecast year GHG levels.
- Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.
- Plan implementation guidance that includes, at minimum, the following components consistent with the CMAP update:
  - Administration and Staffing
  - Finance and Budgeting
  - Timelines for Measure Implementation
  - Community Outreach and Education
  - Monitoring, Reporting, and Adaptive Management
  - Tracking Tools

Project-Level Impacts

The determination above would not preclude future development projects under the Plan from identifying less than significant GHG impacts. If future development projects are consistent with the Bay Area Air District's project-level thresholds, then the project would be considered to have a less-than-significant impact on GHG emissions per Bay Area Air District GHG Threshold A (refer to Section 3.8.2.1). In addition, since the Plan has a 20-year buildout horizon, following completion of the CMAP update that is required under General Plan Mitigation Measure GHG-1, future development projects would have the option of demonstrating compliance with the CMAP in accordance with Bay Area Air District GHG Threshold B. However, in light of the U.S. Court of Appeals for the Ninth Circuit decision regarding Berkeley's natural gas ban, the City cannot enforce portions of the reach codes requiring new development projects to be all electric powered, as the court found federal law preempts a local jurisdiction from banning natural gas appliances and infrastructure. As a result, future projects within the Plan area that are developed with natural gas infrastructure would be considered to have a significant impact with respect to GHG emissions, unless the CMAP had accounted for the natural gas usage proposed by the project and the project adhered to all applicable CMAP requirements to allow the project to be found consistent with and covered by the CMAP.

As noted above, it is unknown at this time whether targets contained in the future CMAP update (required under General Plan Mitigation Measure GHG-1) will be achieved, whether the CMAP will account for any natural gas use in future development, and therefore GHG emissions are considered significant and unavoidable. **(Significant and Unavoidable Impact with Mitigation Incorporated)**

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

This discussion analyzes whether the proposed project would conflict with the City's CMAP, as well as with other applicable plans adopted for the purpose of reducing GHG emissions, including CARB's Scoping Plan and MTC/ABAG's Plan Bay Area 2050.

San Carlos Mitigation and Adaptation Plan

As noted above, the 2021 CMAP includes strategies that would support the City's 2030 and 2045 GHG emissions reductions goals; however, the CMAP demonstrates consistency with current legislative reduction targets for 2030 and not the carbon neutrality goal for 2045. In addition, the proposed Plan would facilitate population growth and development beyond what was accounted for in the CMAP. The 2045 General Plan Reset EIR includes Mitigation Measure GHG-1, which directs the City to update the CMAP within three years of certification of the Final EIR.

A summary of the Plan's consistency with the current 2021 CMAP is provided in Table 3.8-2 below.

Table 3.8-2: CMAP Consistency Analysis

Reduction Goal/Applicable Strategy	Consistency with CMAP
Goal 1: Reduce energy use	
Strategy 1: Regional Energy Conservation and Efficiency Programs. Promote available energy efficiency and conservation opportunities, incentives, and technical assistance for businesses and residents.	**Consistent.** Future development would be required to be constructed in accordance with current State and City building codes in existence at the time. In SCMC Chapter 15.04, Technical Building Codes, the code includes the City's local amendment to the State Building Code Title 24 to require all-electric buildings for many new construction developments and the mandatory measures for EV charging infrastructure in accordance with CALGreen. Lastly, General Plan Policy EM-8.18 encourages construction of more energy efficient buildings.
Goal 2: Transition to carbon-free energy sources	
Strategy 4: Electrification. Transition to electricity as the primary energy source citywide.	**Consistent.** As described above, future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes. Additionally, Chapter 15.16, Streamlined Permitting Process for Small Residential Rooftop Solar Systems, provides a streamlined solar energy system permitting process that complies with the Solar Rights Act and AB 2188 for cost-effective solar energy systems installations.

Reduction Goal/Applicable Strategy	Consistency with CMAP
Strategy 5: Building Codes. Advance electrification through local amendments to the California Building Code.	**Consistent.** As described above, future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes.
Strategy 6: Rooftop Solar. Continue to support and increase participation in rooftop and onsite solar energy systems in the community and at City facilities.	**Consistent.** As described above, future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes, and Chapter 15.16, Streamlined Permitting Process for Small Residential Rooftop Solar Systems. In addition, General Plan Policy EM-9.2 supports on-site generation of energy through alternative forms of energy production, such as solar panels.
Goal 3: Promote energy resilience	
Strategy 8: Battery Storage. Promote installation of small-scale onsite battery energy storage systems for existing and new development, including City facilities.	**Consistent.** As described above, future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes, and Chapter 15.16, Streamlined Permitting Process for Small Residential Rooftop Solar Systems. Additionally, General Plan Policy EM-9.2 supports on-site generation of energy through alternative forms of energy production, such as solar panels, wind turbines and biomass facilities.
Goal 4: Promote sustainable development that reduces vehicle miles traveled	
Strategy 11: Transit-Oriented Development. Encourage development of mixed-use projects, higher-density housing, and job growth within the General Plan's recognized Transit-Oriented Development (TOD) corridor (Planning Areas 1, 2, and 3) while being mindful of surrounding uses.	**Consistent.** The Plan supports a variety of housing and employment types that would encourage better connectivity to employment and commercial uses. General Plan Policies LU-1.2 through LU-1.5 encourage a balanced land use pattern in TOD corridors to improve mobility of people and vehicles. Additionally, Policies EM-11.7, EM-11.11, and LU-2.16, would help reduce VMT per service population and support convenient access to transit within the Plan.
Strategy 12: Active Transportation. Prioritize bicycling and walking as safe, practical, and attractive travel options citywide, as directed by the Bicycle and Pedestrian Master Plan.	**Consistent.** As discussed in Section 3.17 Transportation, the Plan (consistent with the Bicycle and Pedestrian Master Plan) would include pedestrian and bicycle improvements to create opportunities for a variety of travel options. Industrial Road, Old County Road, and Taylor Way would have two-way protected bike lanes. The Plan includes three pedestrian paseos, one along the new north-south street connecting Bragato Road to Quarry Road, and two along Bragato Road to facilitate more connectivity and accessibility in the district. A proposed trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features.

Reduction Goal/Applicable Strategy	Consistency with CMAP
Strategy 15: Public Transportation. Support improvements to public transit routes, services, and facilities to facilitate longer distance travel.	**Consistent.** Portions of the Plan are located within 0.5 mile of a major transit stop (San Carlos and Belmont Caltrain stations) and is entirely within a TPA. There is no direct transit service within the Plan area; however, the Plan would facilitate improvements to the bicycle and pedestrian network, as describe above. These improvements would encourage connections to nearby rail and bus transit.
Strategy 17: Vehicle Miles Traveled. Reduce community-wide transportation-related emissions per resident and employee, with an emphasis on reductions from existing and new development in the city's core commercial, office, and industrial areas, including development on the east side.	**Consistent.** As discussed in Section 3.17 Transportation, the Plan is located in a TPA and therefore, future development projects would result in a less than significant VMT impact. Further, as described in Section 2.3.7 of this EIR, all new development in the Plan would be subject to TDM requirements, with exceptions for 100% affordable housing developments, as well as small housing projects and small non-residential developments. Consistent with C/CAG's TDM Policy, it is assumed that all new development, with noted exceptions, would achieve a 25 percent vehicle trip reduction.
Goal 5: Transition to low-carbon transportation	
Strategy 18: Electric Vehicles. Support residents and business owners to transition to electric and plug-in hybrid vehicles.	**Consistent.** Future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes. In addition, Chapter 15.20, Streamlined Permitting Process for Electric Vehicle Charging Stations, also promotes the use of electric vehicles by creating an expedited, streamlined permitting process for electric vehicle charging stations.
Strategy 19: Safe Routes to School. Continue to support the Safe Routes to Schools Program and reduction of GHG emissions from school-related trips.	**Consistent.** General Plan Policies EM-11.7 and LU-3.10 would support programs to reduce vehicle trips associated with transporting students and safe, walkable environments to access schools.
Strategy 21: Car sharing. Promote electric vehicle and low-carbon fuel car-sharing programs.	**Consistent.** General Plan Action EM-11.5 and CSH-3.4, and Policy EM-11.8, encourages transit providers to utilize vehicles with low polluting technologies and ridesharing programs.
Goal 6: Support pollution-free outdoor equipment	
Strategy 23: Clean-fuel construction and landscaping. Encourage hybrid and clean-fuel construction and landscaping equipment citywide.	**Consistent.** General Plan Policy EM-6.3, EM-6.6, and LU-8.18 supports reduction of PM_{10} and exhaust emissions from construction activities through better construction practices. Policy PR-4.12 and Action EM-6.3 encourages exploration of different landscaping equipment to reduce contribution to air pollution.
Goal 7: Become a zero-waste community	

Reduction Goal/Applicable Strategy	Consistency with CMAP
Strategy 27: Construction and Demolition Waste. Increase the amount of waste recycled during construction and demolition of buildings.	**Consistent.** Future development projects would be required to comply with AB 939. SCMC Chapter 8.05, Recycling and Diversion of Construction and Demolition Debris, contains diversion requirements and waste management plan as part of the building or demolition permit process in alignment with AB 939. In addition, General Plan Action EM-12.3, EM-12.5, and EM-12.6 would require a construction and demolition debris waste plan to maximize recycling rates and encourage practices, such as building deconstruction or recycled pavement.
Goal 8: Reduce community-wide water use	
Strategy 31: Water-efficient Retrofits. Encourage water-efficient retrofits of existing buildings by working with water providers and regional agencies.	**Consistent.** Future development would be required to be constructed in accordance with current State and City building codes, as well as SCMC Chapter 15.04, Technical Building Codes. Chapter 15.04 provides regulations for energy efficiency, water efficiency, material conservation, environmental quality, and more. Additionally, General Plan Policy EM-5.3 and EM-5.5 would promote the conservation and efficient use of water in new and existing development.
Strategy 32: Water-wise Landscaping. Promote drought-tolerant and fire wise landscaping.	**Consistent. F**uture development would be required to be constructed in accordance with current State and City building codes, which include requirements related to water use for landscaping. This includes the California Water Code, California's Model Water Efficient Landscape Ordinance standards, and SCMC 18.18, Landscaping, to implement water-conserving irrigation practices to conserve water and energy. Additionally, General Plan Policy EM-5.4 encourages the use of drought-tolerant plans and efficient watering techniques.
Strategy 33: Graywater and Recycled Water. Promote graywater and recycled water systems.	**Consistent.** Future development would be required to be constructed in accordance with current State and City building codes, including the California Water Code, California's Model Water Efficient Landscape Ordinance standards, and SCMC Chapter 18.18, Landscaping, to implement water features using recycled water. Additionally, General Plan Policy EM-5.5, and Action EM-5.6 and EM-5.8 would promote the use of recycled water distribution system for landscaping and other non-potable water uses.

As summarized above in Table 3.8-2 above, future development under the Plan would be consistent with the strategies in the City's CMAP. However, the CMAP demonstrates consistency with current legislative reduction targets for 2030 and not the carbon neutrality goal for 2045. In addition, the proposed Plan would facilitate population growth and development beyond what was accounted for in the CMAP. The 2045 General Plan Reset EIR includes Mitigation Measure GHG-1, which directs the City to update the CMAP within three years of certification of the Final EIR.

CARB Scoping Plan

Future development projects would be required to adhere to the statewide programs and regulations identified by the Scoping Plan and implemented by State, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. For example, new buildings in the Plan would be required to meet the CALGreen and Title 24 Building Energy Efficiency Standards in effect at the time when applying for building permits.

Plan Bay Area 2050

Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified PDAs. Portions of the Plan are located within 0.5 mile of a major transit stop (San Carlos and Belmont Caltrain stations) and is entirely within a TPA. Further, as described in Section 2.3.7 of this EIR, all new development in the Plan would be subject to TDM requirements, with exceptions for 100% affordable housing, as well as small housing developments and small non-residential developments. Consistent with C/CAG's TDM Policy, it is assumed that all new development, with noted exceptions, would achieve a 25 percent vehicle trip reduction.

The Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

3.8.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact?

As discussed above, GHG emissions have a broader, global impact; therefore, if a project would result in a significant project-level GHG impact, it would also result in a significant cumulative GHG impact. The discussion above under checklist questions a) and b) show that the Plan would have a significant GHG emissions impact. Therefore, the project would result in a cumulatively considerable contribution to a significant cumulative GHG emissions impact. **(Significant and Unavoidable Cumulative Impact with Mitigation Incorporated)**

3.9 Hazards and Hazardous Materials

The following discussion is based, in part, on a Screening Level Environmental Site Assessment (ESA) prepared by Cornerstone Earth Group, dated January 11, 2023. The report is included as Appendix D to this EIR.

3.9.1 Environmental Setting

3.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to

releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[72]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement

[72] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed September 3, 2024. https://www.epa.gov/superfund/superfund-cercla-overview.

authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[73]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[74]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The San Mateo County Department of Environmental Health reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.[75] The EPA is currently considering a proposed ban on on-going use of

[73] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed August 29, 2024. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[74] California Environmental Protection Agency. "Cortese List Data Resources." Accessed August 29, 2024. https://calepa.ca.gov/sitecleanup/corteselist/.
[75] United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed August 29, 2024. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos

asbestos.[76] National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

CCR Title 22, Division 4.5

CCR Title 22, Division 4.5, sets forth the requirements for hazardous-waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These regulations include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting shipments of hazardous waste, including manifesting, vehicle registration, and emergency accidental discharges during transportation.

Regional and Local

Municipal Regional Permit Provision C.12.f

PCBs were produced in the United States between 1955 and 1978 and used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the EPA banned the production and use of PCBs due to their potential harmful health effects and persistence in the environment. PCBs can still be released to the environment today during demolition of buildings that contain legacy caulks, sealants, or other PCB-containing materials.

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater NPDES MRP by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure PCBs do not enter municipal storm drain systems.[77] Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a

[76]United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed August 29, 2024. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos

[77] California Regional Water Quality Control Board San Francisco Region. Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008. May 11, 2022.

demolition permit. Single family homes and wood-frame structures are exempt from these requirements.

Santa Mateo County Airport Land Use Commission

The Santa Mateo County Airport Land Use Commission (ALUC), comprised of the San Mateo County C/CAG Board, is responsible for guiding the public safety of airports and ability for them to operate presently and in the future. The jurisdiction of the ALUC is limited to a review of new land uses that might fall within an ALUC zone. The ALUC developed the Comprehensive ALUCP for the San Carlos Airport which was adopted on November 2009 and amended in October 2015. The ALUCP is intended to safeguard the general welfare of the inhabitants within the vicinity of the airport and the aircraft occupants. The ALUCP is also intended to ensure that surrounding new land uses do not affect the airport's continued operation. Specifically, the ALUCP seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures or activities adversely affect navigable airspace. The implementation of the ALUCP is intended to prevent future incompatible development from encroaching on the airport and allow for its development in accordance with the current City plans. The aviation activity forecast for the airport was updated to reflect the existing aviation activity and provide at least a 20-year forecast of activity. The updated aviation activity forecast formed the basis for preparation of the 2035 aircraft noise contours.

The ALUCP requires proposed land use policy changes and land development proposals in the airport vicinity be compatible with continued aircraft operation and public safety. The ALUCP designates six safety zones,[78] as shown in Exhibit 4-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.[79] The Plan area is located within Zone 6 – Traffic Pattern Zone.

Additionally, the ALUCP establishes a planning boundary around the airport called the Airport Influence Area (AIA) which is based upon the runway orientation and associated noise impacts of overflight aircraft. The ALCUP for the San Carlos Airport delineates two Airport Influence Areas (AIA), Area A and Area B, within proximity to the airport. As a requirement for development located in Area A, the presence of existing airports within two miles of the property must be disclosed in the notice of intention to offer the property for sale. For development located within Area B of the AIA, the C/CAG Board shall exercise its statutory duty to review proposed land development proposals, among other plans, ordinances, amendments, and actions. The entire Plan is located in Area B.

The ALUCP includes compatibility criteria and policies for safety, airspace protection, and overflight that apply to designated activities occurring within the airport's safety zones and AIA. To evaluate consistency with safety compatibility criteria, the ALUCP Table 4-4 lists land uses that are compatible, conditionally compatible, and incompatible. Additionally, California Public Utilities Code

[78] San Carlos Airport Safety Zones include Zone 1 – Runway Protection Zone, Zone 2 – Inner Approach/Departure Zone, Zone 3 – Inner Turning, Zone 4 – Outer Approach/Departure Zone, Zone 5 – Sideline Zone, and Zone 6 – Traffic Pattern Zone.

[79] City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*. October 2015.

Section 21676 requires San Carlos' and San Mateo County's General Plan land use designations to be in conformance with the land use plans and policies of the ALUCP.

County of San Mateo Health Services Agency

The County of San Mateo Health Services Agency (CSMHSA), which includes the Division of Environmental Health, serves as the County Local Oversight Program within the County of San Mateo for hazardous materials and soil and groundwater contamination. This agency oversees several programs related to hazardous materials and releases, including the Hazardous Materials Business Plan Program, Hazardous Waste Generator Program, California Accidental Release Program, Hazardous Material Program Fees, Underground Storage Tank Program, Underground Storage Tanks Form Index, Groundwater Protection Program, Stormwater Protection Program, Emergency Response Program, Household Hazardous Materials Emergency Response Service, Household Waste Program, Universal Waste Program and Medical Waste Program.
The Hazardous Materials Division of the CSMHSA oversees hazardous materials permitting, hazardous materials oversight and hazardous materials facility closures. Virtually all hazardous waste use, spills and releases are reported to and regulated under the CSMHSA; however, the City of San Carlos falls under the jurisdiction of the Redwood City-San Carlos Fire Department (RC-SCFD), which is the first responder to hazardous material spills and releases.

San Mateo County Multi-Jurisdictional Hazard Mitigation Plan

The purpose of hazard mitigation planning is to reduce the loss of life and property by minimizing the impact of disasters. The San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan (MJHMP), updated in 2021 in accordance with the federal Disaster Mitigation Action of 2000, provides an assessment of natural hazards in the county and a set of short-term mitigation actions to reduce or eliminate the long-term risk to people and property from these hazards.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating hazards and hazardous materials impacts resulting from planned development within the City including the following:

Policy	Description
ESPS-5.1	Prohibit uses involving the manufacturing of hazardous materials throughout the city. Hazardous materials are defined in Chapter 6.95, Section 25501 0-1 of the Health and Safety Code. This policy applies only to the direct manufacture of hazardous substances. It does not apply to the storage or use of such materials in conjunction with permitted commercial and industrial uses.
ESPS-5.2	Require producers of and users of hazardous materials in San Carlos to conform to all local, State, and federal regulations regarding the production, disposal and transportation of these materials.
ESPS-5.3	Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria and standards enforcement.

Policy	Description
ESPS-5.4	Mitigate indoor air intrusion potential in areas of new development or redevelopment where the property is located above known volatile compound plumes.
ESPS-5.5	Where deemed necessary, based on the history of land use, require site assessment for hazardous and toxic soil contamination prior to approving development project applications.
ESPS-5.6	Require that new development proposals are reviewed for legally required remediation by authorities with jurisdictional authority over groundwater and surface water contamination including but not limited to San Mateo County Environmental Health, State Water Quality Control Board and the Army Corps of Engineers, where waters of the United States are involved, and collaborate with authorities to ensure all relevant remediation requirements are met.
ESPS-5.7	Prohibit new non-residential uses that are known to release or emit toxic waste at levels that are harmful to human health while continuing to allow life science, research and development, medical, and other necessary services such as dry cleaners.
ESPS-5.8	Require the preparation of emergency response plans as part of use applications for all large generators and users of hazardous waste as required by federal law.
ESPS-5.11	Encourage the use of green building practices to reduce potentially hazardous materials in construction materials.
ESPS-6.1	Maintain land use and development in the vicinity of San Carlos Airport that are consistent with the relevant airport/land use compatibility criteria and guidelines contained in the adopted Airport/Land Use Compatibility Plan for the environs of San Carlos Airport, including noise, safety, height, and avigation easement requirements.
ESPS-6.2	Submit proposed land use policy actions (general plans/amendments, specific plans/amendments, rezonings, etc.) and related development plans, if any, that affect property located within the Area B portion of the Airport Influence Area (AIA) boundary for San Carlos Airport, to the San Mateo County Airport Land Use Commission for review/action, pursuant to California Public Utilities Code Section 21676(b), prior to final action by the City.
ESPS-12.2	Ensure the San Carlos municipal code protects development from rising groundwater levels. This may include measures to protect underground utilities from constant submersion, the construction of building foundations and roadbeds in saturated soils, the protection of underground structures, and the management of groundwater dewatered during construction.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to hazards and hazardous materials as follows:

- Section 2.28.080, Emergency Plan, states that the City of San Carlos Disaster Council is responsible for the development of the City's emergency plan, which shall provide the effective mobilization of all the resources of the City, both public and private, to meet any condition constituting a local emergency.
- Title 13, Public Services, requires that individual business plans for any facility subject to the hazardous materials inventory response program include a program for compliance.

- Title 18, Zoning, regulates what types of properties are permitted to use hazardous materials and specifically regulates the location of these types of facilities to ensure that they do not endanger the general public and that they are separate from sensitive land uses such as schools.

San Carlos Emergency Operations Plan

The City Council adopted the City of San Carlos Emergency Operations Plan (EOP) in March 2022. The EOP establishes the emergency management structure utilized for prevention, protection, response, and recovery of emergencies affecting the City; the operational concepts and procedures associated with day-to-day field response to emergencies by City departments; and the policies and procedures for the San Carlos Emergency Center activities. The plan also identifies the policies, responsibilities, and procedures utilized to protect the health and safety of residents, public and private property, and the environmental effects of natural, technological, and man-made emergencies and disasters, as well as defines the procedures for a disaster recovery process.

3.9.1.2 *Existing Conditions*

Site History

The Plan area consisted predominately of undeveloped land between the late 1800s and early 1940s, with the exception of a few residences. The eastern portion of the Plan historically consisted of marshland and Belmont Creek traversed the Plan, generally from west to east.

By the mid-1940s, a few commercial buildings were constructed within the Plan, mainly along Old County Road. By 1953, the marshland on the eastern portion of the Plan was filled. A gradual increase in commercial development occurred in the 1950s, 1960s and 1970s. By the 1980s, most sites within the Plan were developed for commercial use.

On-Site Sources of Contamination

Multiple businesses in the Plan appear to have handled and stored hazardous substances such as petroleum hydrocarbons, metals, volatile organic compounds (VOCs) and PCBs. As summarized in Table 3.9-1 and shown in Figure 3.9-1, spill incidents have been reported at several sites in the Plan. As a result, properties have impacted soil, soil vapor and/or groundwater.

Table 3.9-1: Summary of Known On-Site Sources of Contamination

Map Id.	Database Name (Address)	Status	Potential Contaminants of Concern	Potential Media of Concern
4	Circuits Facility (641 Quarry Road)	Open Cleanup Program Site	VOCs	Soil, soil vapor and groundwater
8	Putnam Honda and Tiegel Family Trust (495 Bragato Road or 268 Industrial Road)	Open Cleanup Program Site	PCBs, TCBs, petroleum hydrocarbons, and VOCs	Soil and groundwater
9	Delta Star (0270 Industrial Road	Open Cleanup Program Site/Closed Leaking Underground Storage Tank (LUST) case	PCBs, TCBs, petroleum hydrocarbons, and VOCs	Soil and groundwater
13	Peninsula Laboratories (601 Taylor Way)	Open Cleanup Program Site	VOCs	Soil, soil vapor, and groundwater
7	Former Spacesonic (266 Industrial Road)	Closed Cleanup Program Site	Metals and VOCs	Soil, soil vapor, and groundwater
14	EIMAC-Varian (301 Industrial Road)	Closed Cleanup Program Site	VOCs, PCBs, petroleum, and metals	Groundwater
15	B&H Technical Ceramics (390 Industrial Road)	Open LUST case	Petroleum hydrocarbon and VOCs	Soil vapor and groundwater
1	Matagrano, Inc. (610 Quarry Road)	Closed LUST case*	Petroleum hydrocarbon	Soil and groundwater
2	Sam Trans/Ickler Construction **(**599 Quarry Road**,** also identified as 580, 585 and 591 Quarry Road)	Closed LUST case*	Unknown	Soil
3	Olympian Cardlock Stn. **(**200 Industrial Road also identified as 220 Industrial)	Closed LUST case*	Petroleum hydrocarbon	Groundwater
5	Carey Property (580 Bragato Road)	Closed LUST case*	Petroleum hydrocarbon	Groundwater
6	Bragato Paving (535 Bragato Road)	Closed LUST case*	Petroleum hydrocarbon	Soil and groundwater
10	PG&E (275 Industrial Road)	Closed LUST case*	Petroleum hydrocarbon	Soil and groundwater

Map Id.	Database Name (Address)	Status	Potential Contaminants of Concern	Potential Media of Concern
11	Story's Brake Service (1670 Old County Road; currently 235 or 239 Old County Road)	Closed LUST case*	Petroleum hydrocarbon	Soil
12	Parmel Properties (267 Old County Road)	Closed LUST case*	Unknown	Groundwater

Notes:

Bold = Site management requirements were stipulated in the regulatory agency case closure documentation that consisted of the following (or substantially similar) language: As a result of residual contaminant concentrations, changes in land use or removal of soil and groundwater from the affected area may create a risk. Therefore, any proposed change in land use or proposed soil or groundwater removal activity at or in close proximity to the subject site must be submitted to the San Mateo County Groundwater Protection Program (GPP) for review under government code section 65850.2 so GPP can evaluate whether the residual contaminates will likely pose a risk to public health and the environment if the proposed activities are implemented.

* Residual contaminant concentrations potentially remain at each of these properties.

Source: Cornerstone Earth Group. *Screening Level Environmental Site Assessment San Carlos Northeast Area Specific Plan.* January 11, 2023.



Source: Cornerstone Earth Group, January 2023.

SOURCES OF CONTAMINATION WITHIN THE PLAN

FIGURE 3.9-1

As shown in Table 3.9-1, identified contaminants have included VOCs, petroleum hydrocarbons, metals and/or PCBs. Several of the associated LUST and Cleanup Program cases have been closed by the overseeing regulatory agencies. One LUST case and four Cleanup Program cases remain open; at these parcels, characterization, monitoring and/or remediation activities are on-going and are being conducted under regulatory agency oversight. At the closed LUST and Cleanup Program sites, residual contamination may remain in soil, soil vapor and/or groundwater.

For the Delta Star property (Map Id. #9) at 270 Industrial Road, a Land Use Covenant was established for a portion of the property where soil with PCB concentrations exceeding the established cleanup standards was left in place and capped. Among other provisions, the Land Use Covenant prohibits certain sensitive uses of the property (*e.g.*, residential, schools, hospitals, day care facilities, etc.) unless approved by the DTSC.

Off-Site Sources of Contamination

The Screening Level I ESA identified two off-site (i.e. outside the Plan area) sources of contamination of concern associated with releases of VOCs from the Purex Industries property (511 O'Neill Avenue) and the Brusco Property (248 Harbor Boulevard) that may have led to contamination affecting properties within the Plan area. Characterization, monitoring and remedial efforts are on-going at these facilities, which are open Cleanup Program sites under DEH and Water Board oversight.

Asbestos, Lead-Based Paint, Polychlorinated Biphenyls

Due to the age of the existing buildings within the Plan, ACMs and lead-based paints may be present. In addition, materials including lamps, thermostats, light switches that contain mercury, batteries from exit signs, emergency lights, smoke alarms, lighting ballasts which contain PCBs, lead pipes, and roof vent flashings could result in risk to human health and the environment if improperly managed.

Airport Hazards

San Carlos Airport is located as close as 1,100 feet to the east of the Plan area. The Plan area is subject to Federal Aviation Regulations and the ALUCP, which provides policies and regulations pertaining to land use that may affect, or be affected by airport operations, including restrictions for the height of structures within the ALUCP area and/or elements that may affect normal aviation operations or that could create a safety hazard for aircraft. The Plan is located within the San Carlos Airport AIA, specifically within Area B. Development proposals within the AIA are required to be reviewed by the ALUC.

The ALCUP is divided into six safety zones. The majority of the Plan is located in Zone 6, however, a small portion of the PAMF site is within Zone 3. Commercial (i.e., office and retail), manufacturing, R&D, industrial uses, and residential are all considered compatible uses in Safety Zone 6.

The ALUCP establishes policies height/airspace protection and overflight areas. The Plan is located within the overflight notification zone.

Wildland Fire Hazards

The Plan is not located within a state responsibility area or lands classified as very high fire hazard severity.[80]

3.9.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hazards and hazardous materials, would the project:

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
2) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?
6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

[80] CalFire. *Fire Hazard Severity Zone Viewer.* Accessed August 30, 2024. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/

3.9.2.1 *Project Impacts*

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction

Future construction of development projects in the Plan would involve the use of potentially hazardous materials, including vehicle fuels, oils, and fluids. All hazardous materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Construction-related hazardous materials use would be temporary, and does not constitute routine transport, use, or disposal. The proposed project would include demolition of the existing building on-site. Any hazardous materials (e.g., debris or soil containing lead-based paint or coatings) that would be removed from the site during project construction would be properly disposed of.

Operation

Existing uses within the Plan use, handle, generate, and store hazardous materials and hazardous waste. Existing uses also use and store fertilizers, pesticides, herbicides, and consumer cleaning chemicals. Future uses could also use, handle, generate, and store similar type hazardous materials as existing, ongoing uses.

The use, storage, transport, and disposal of hazardous materials by future residents and commercial and industrial tenants/owners would be required to comply with existing regulations that apply to the uses that involve transporting, using, or disposing of hazardous materials include RCRA, CERCLA, and CCR Title 22 (refer to Section 3.9.1.1 Regulatory Framework). SCMC Title 13 also requires that individual business plans for any facility subject to the hazardous materials inventory response program include a program for compliance. Future development may include diesel generators to be used in case of emergency; under Health and Safety Code 25507(a)(1)(A), new development would be required to establish and implement a Hazardous Materials Business Plan if the amount of diesel fuel stored on-site exceeds 55 gallons. Adherence with the aforementioned regulations and processes would ensure that the routine transport, use, or disposal of hazardous materials by future development under the Plan would not create a significant hazard to the public or the environment.

As discussed above, implementation of the Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Demolition

As discussed in Section 3.9.1.2 Existing Conditions, due to the age of the existing buildings within the Plan, ACMs, lead-based paints, and PCBs may be present and could pose a risk to human health and the environment if improperly managed. Future development would adhere to CCR Title 8, Section 1532.1 and MRP Provision C.12.f to reduce impacts from ACMs, LBP, and PCBs. Therefore, with compliance with existing federal, State, and local regulations, hazardous impacts during demolition would be less than significant.

Subsurface Contamination

Table 3.9-1 summarizes known sources of contamination in the Plan. As discussed in Section 3.9.1.2 Existing Conditions, properties in the Plan have impacted soil, soil vapor and/or groundwater due to past and current operations in the Plans that involve the handling and storing of hazardous substances such as petroleum hydrocarbons, metals, VOCs and PCBs. Additionally, there are two sources of contamination from outside the Plan area associated with releases of VOCs from the Purex Industries property (511 O'Neill Avenue) and the Brusco Property (248 Harbor Boulevard) that may have led to VOC contamination affecting properties within the northern part of the Plan area.

Impact HAZ-1: Future development within the Plan could encounter and disturb contaminated soil, soil vapor, and groundwater, and result in adverse effects on construction workers, existing residents and employees, and nearby sensitive receptors.

General Plan Policies that Reduce Impacts

The following General Plan policies would reduce impacts associated with contaminated soil, soil vapor and/or groundwater from future development in the Plan:

- **ESPS-5.3:** Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria and standards enforcement.
- **ESPS-5.5:** Where deemed necessary, based on the history of land use, require site assessment for hazardous and toxic soil contamination prior to approving development project applications.
- **ESPS-5.6:** Require that new development proposals are reviewed for legally required remediation by authorities with jurisdictional authority over groundwater and surface water contamination including but not limited to San Mateo County Environmental Health, State Water Quality Control Board and the Army Corps of Engineers, where waters of the United

States are involved, and collaborate with authorities to ensure all relevant remediation requirements are met.

Compliance with the above General Plan policies would ensure that future development under the Plan does not create a significant hazard to the public or the environment through the disturbance of contaminated soil, soil vapor, and groundwater. **(Less than Significant Impact)**

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

There are no existing or proposed schools within one-quarter mile of the Plan. The Plan would be built out over a 20-year period so it is possible that a future project could be located within 0.25 mile of a school, if a school were to be located near the Plan in the future. As discussed under checklist question a), future development would comply with existing regulations that apply to the uses that involve transporting, using, or disposing of hazardous materials include RCRA, CERCLA, and CCR Title 22 (refer to Section 3.9.1.1 Regulatory Framework). SCMC Title 13 also requires that individual business plans for any facility subject to the hazardous materials inventory response program include a program for compliance. During future demolition and construction activities, adherence to existing federal, State, and local regulations (including General Plan policies) would ensure that future development under the Plan does not create a significant hazard to the public or the environment. Therefore, future development under the Plan would not result in the emission of hazardous emissions or exposure of an existing or proposed school to hazardous materials, substances, or waste. **(Less than Significant Impact)**

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Within the Plan area, there are 15 cleanup sites and/or sites listed in the LUST database (refer to Table 3.9-1), which is one of the lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (i.e., the Cortese List). Three of the 15 cleanup and/or LUST sites are proposed to be reclassified and rezoned for residential uses (refer to Map Id. 6, 13, and 15). Site 6 does not have any land use restrictions in place if the land use on site were to change. Both sites 13 and 15 are still active and it is possible that eventual case closure documentation will include regulatory conditions that need to be satisfied if the land use were changed to residential.

As discussed under checklist question b), future development at these sites could encounter and disturb soil, soil vapor, and groundwater contaminated with petroleum hydrocarbons, metals, VOCs and PCBs. Consistent with General Plan policies ESPS-5.3, ESPS-5.5 and ESPS-5.6, future development projects would be required to complete site assessments and mitigate hazard exposure during environmental review. Any required remediation would be completed under the oversight of the appropriate oversight agency to ensure that all remediation requirements are met.

Additionally, all dewatering activities, including the dewatering of contaminated groundwater, would be conducted in accordance with the requirements of the RWQCB and the City's Municipal Code, which would ensure that contaminated groundwater is disposed of properly and is not discharged into the storm drain system (refer to Section 3.10 Hydrology and Water Quality). Adherence with the aforementioned regulations and processes would ensure that future development at sites on the Cortese List under the Plan would not create a significant hazard to the public or the environment. **(Less than Significant Impact)**

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

The Plan is located within the San Carlos Airport AIA, specifically within Area B. Development proposals within Area B of the AIA are required to be reviewed by the ALUC. The ALUCP focuses on the four primary land use compatibility concerns: 1) aircraft noise, 2) safety of persons on the ground, 3) airspace protection/building heights, and 4) aircraft overflights.

Aircraft Noise

As discussed in Section 3.13 Noise, the eastern portion of the Plan lies within the 60 dBA CNEL noise contour, however the entire Plan Area is outside of the boundary for 65 CNEL. Future residential development could potentially fall within the 55 dBA CNEL of the San Carlos Airport. The 2045 General Plan Reset EIR found that adherence to General Plan Policies NOI-1.11 and NOI-1.13, SCMC Sections 18.21.050-F and 18.21.150-C, and compliance with land use compatibility standards of the San Carlos ALUCP, would ensure aircraft noise impacts associated with implementation of the Plan are considered less than significant.

Safety of Persons on the Ground

The objective of the ALUCP safety compatibility criteria is to minimize the potential number of residents and workers exposed to hazards related to aircraft operations and accidents. The ALCUP is divided into six safety zones. These zones include the (1) Runway Protection Zone, (2) Inner Approach/Departure Zone, (3) Inner Turning Zone, (4) Outer Approach/Departure Zone, (5) Sideline Zone, and (6) Traffic Pattern Zone. The majority of the Plan is located in Zone 6, however, a small portion of the PAMF site is within Zone 3. Commercial (i.e., office and retail), manufacturing, R&D, industrial uses, and residential are all considered compatible uses in Safety Zone 6. Schools and daycares would be conditionally compatible in Zone 6.

Airspace Protection/Building Heights

San Carlos Airport is located as close as 1,100 feet to the east of the Plan area. Developers or other parties that propose buildings or alterations to buildings greater than 200 feet in height (above grade), or structures within 10,000 linear feet of the airport that would penetrate a 50:1 plane sloping up and away from the airport runway, must complete and submit FAA Form 7460-1 to the

FAA. The Plan is located within Area B of the AIA, therefore, future development proposals would be reviewed by C/CAG pursuant to General Plan Action ESPS-6.1. No buildings would be allowed within the Plan that exceed 155 feet from finished grade or above mean sea level, whichever is more restrictive.

- **Action ESPS-6.1:** Submit proposed land use policy actions (general plans/amendments, specific plans/amendments, rezonings, etc.) and related development plans, if any, that affect property located within the Area B portion of the Airport Influence Area (AIA) boundary for San Carlos Airport, to the San Mateo County Airport Land Use Commission for review/action, pursuant to California Public Utilities Code Section 21676(b), prior to final action by the City.

Aircraft Overflights

The ALUCP establishes policies height/airspace protection and overflight areas. The Plan is located within the overflight notification zone. California state statutes (Business and Professional Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353) mandate that sellers or lessors of real property must disclose information regarding whether their property is situated within an airport influence area. Notification of the proximity to the airport would be required for all future real estate transactions within the Plan, in accordance with existing regulations.

Future development under the Plan would comply with ALUCP safety compatibility policies, including notification requirements, to prevent aviation hazards. **(Less than Significant Impact)**

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

San Carlos's EOP establishes the emergency organization and assigns tasks and general procedures. The City uses an automated telephone and text message system (SMC Alert) that can notify affected portions of the community when emergency alerts or notifications are needed.[81] During an emergency, CAL FIRE and RC-SCFD would provide emergency services in the Plan area.

The Plan would not result in substantial changes to the circulation patterns or emergency access routes and would not block or otherwise interfere with use of evacuation routes. The Plan would include a roadway connection between Quarry Road and Bragato Road, thereby improving access within the Plan and facilitating emergency response. For these reasons, implementation of the Plan would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

[81] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report*. January 2025.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The Plan is not located within a state responsibility area or lands classified as very high fire hazard severity. Accordingly, no people or structures would be exposed to a significant risk of loss, injury, or death involving wildland fires as a result of the Plan. **(Less than Significant Impact)**

3.9.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact?

Transport, Use, and Disposal of Hazardous Materials

The 2045 General Plan Reset EIR concluded that the transport, use, and disposal of hazardous materials by future development within the City of San Carlos would not create a significant hazard to the public or the environment with adherence to the regulations and processes identified in Section 3.9.1.1, which are mandated by federal and state law. All cumulative projects within the cumulative area of effect would be subject to these regulations and processes. Accordingly, the project would not contribute to a cumulatively considerable impact on the public or environment due to the transport, use, and disposal of hazardous materials.

Release of Hazardous Materials Due to Upset and Accident Conditions

Future cumulative projects would adhere to CCR Title 8, Section 1532.1 and MRP Provision C.12.f to reduce demolition impacts from ACMs, LBP, and PCBs. Future cumulative projects with the potential to encounter and disturb contaminated soil, soil vapor, and groundwater would be required to comply with General Plan policies ESPS-5.3, ESPS-5.5, and ESPS-5.6, which requires completion of site assessments and mitigating hazard exposure as part of the environmental review process. In addition, any required remediation for cumulative projects would be completed under the oversight of the appropriate oversight agency to ensure that all remediation requirements are met. Consistent with the findings of the 2045 General Plan Reset EIR, adherence with the regulations and processes identified in Section 3.9.1.1 by all cumulative projects (as mandated by federal and state law) would ensure that the Plan does not contribute to a cumulatively considerable impact due to the release of hazardous materials into the environment.

Hazardous Emissions and Acutely Hazardous Materials, Substances, and Waste

The 2045 General Plan Reset EIR concluded that future development in compliance with existing regulations that apply to the uses that involve transporting, using, or disposing of hazardous materials (including RCRA, CERCLA, and CCR Title 22) and SCMC Title 13 would not result in the emission of hazardous emissions or exposure of an existing or proposed school to hazardous materials, substances, or waste.

Government Code Section 65962.5 Sites

Pursuant to the discussion under checklist question d), cumulative development projects would be required to adhere with the aforementioned regulations and processes to ensure that development would not create a significant hazard to the public or the environment.

Airport Safety Hazards

As discussed under checklist question e), future cumulative projects within AIA Area B would be reviewed by C/CAG pursuant to General Plan Action ESPS-6.1. The 2045 General Plan Reset EIR found that with adherence to General Plan Policies NOI-1.11 and NOI-1.13, SCMC Sections 18.21.050-F and 18.21.150-C, and compliance with land use compatibility standards of the San Carlos ALUCP, would ensure aircraft noise impacts associated with cumulative development are considered less than significant. Developers or other parties that propose buildings or alterations to buildings greater than 200 feet in height (above grade), or structures within 10,000 linear feet of the airport that would penetrate a 50:1 plane sloping up and away from the airport runway, must complete and submit FAA Form 7460-1 to the FAA. Compliance with the ALUCP policies would ensure that cumulative airport safety hazard impacts would be less than significant.

Impairment or Interference with Emergency Plans

The 2045 General Plan Reset EIR concluded that future development would not conflict with the City's EOP. The Plan would not result in substantial changes to the circulation patterns, other than providing a new connection between Quarry Road and Bragato Road, or emergency access routes and would not block or otherwise interfere with use of evacuation routes. Therefore, the Plan would not result in a cumulatively considerable impact due to the impairment or interference with emergency response or evacuation plans.

Exposure of People and Structures to Wildland Fires

As discussed under checklist question g), the Plan would not expose any people or structures to wildland fires. As discussed above, the project would not impair or interfere with emergency response or evacuation plans, including those related to wildland fires. Therefore, the project would not contribute to a cumulatively considerable impact.

With adherence to existing regulations and policies (including the General Plan), the project would not result in a cumulatively considerable contribution to a significant hazardous materials impact. **(Less than Significant Cumulative Impact)**

3.10 Hydrology and Water Quality

The following discussion is based, in part, on a Flood Impact Study prepared by Schaaf & Wheeler. The report, dated March 26, 2025, is attached to this EIR as Appendix E.

3.10.1 Environmental Setting

3.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the EPA and the SWRCB have been developed to fulfill the requirements of this legislation. EPA regulations include the NPDES permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the RWQCBs. The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.[82]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a NOI must be filed with the RWQCB by the project sponsor, and a SWPPP must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The

[82] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed September 2, 2022. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES MRP in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[83] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and LID-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flowcontrolled reservoir, or, in a catchment that drains to channels that are tidally influenced; or (3)

[83] California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022.

the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).[84]

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.[85] Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single-family residential and wood frame structures are exempt.

General Industrial Permit

The Statewide General permit for Storm Water Discharges Associated with Industrial Activities, Order No. 2014-0057-DWQ and amended by 2015-0122-DWQ (2018) implements the federally required storm water regulations in California for storm water associated with industrial activities that discharge to waters of the United States. This regulation covers facilities that are required by federal regulations or by the RWQCBs to obtain an NPDES permit. Dischargers are required to eliminate non-storm water discharges, develop SWPPPs that include BMPs, conduct monitoring of stormwater runoff, and submit all compliance documents via the SWRCB's SMARTS program.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) was established in 1990 to reduce the pollution carried by stormwater into local creeks, San Francisco Bay, and the Pacific Ocean. The program is a partnership of the C/CAG, each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System permit. The SMCWPPP includes pollution reduction activities for construction

[84] The Hydromodification Applicability Maps developed the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

[85] California Regional Water Quality Control Board San Francisco Region. *Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008*. May 11, 2022.

sites, illegal discharges and illicit connections, new development, and municipal operations. The program also includes a target pollutant reduction strategy and monitoring program.

San Mateo County Storm Water Resources Plan

The San Mateo County Stormwater Resource Plan (SRP) is a comprehensive document that addresses specific stormwater runoff issues in the county with a watershed-based approach. The main goals of the SRP are to identify and prioritize opportunities to better utilize stormwater as a resource in San Mateo County through a detailed analysis of watershed processes, surface and groundwater resources, input from stakeholders and the public, and analysis of multiple benefits that can be achieved through strategically planned stormwater management projects. These projects aim to capture and manage stormwater more sustainably, reduce flooding and pollution associated with runoff, improve biological functioning of plants, soils, and other natural infrastructure, and provide many community benefits, including cleaner air and water and enhanced aesthetic value of local streets and neighborhoods. Senate Bill 985 (Pavley, 2014) requires SRPs to be developed to be eligible for funding from future State bond measures for stormwater and dry weather capture projects.

San Mateo County Flood and Sea Level Rise Resiliency District

In April 2018, the C/CAG Countywide Water Coordination Committee proposed the formation of a countywide agency to address sea level rise, flooding, coastal erosion, and regional stormwater infrastructure. Assembly Bill 825 was signed into law in September 2019 and, on January 1, 2020, the San Mateo County Flood and Sea Level Rise Resiliency District, more commonly known as OneShoreline, was formed.

With startup funding from San Mateo County and 20 incorporated cities, OneShoreline has initiated several projects to protect against the impact of sea level rise. In terms of financial losses due to climate change, San Mateo County is the most vulnerable county in California. By 2100, it is estimated that over 40 percent of the land could be affected. OneShoreline is working with several cities within San Mateo County to update their General Plans, Specific Plans, and zoning ordinances to address future conditions brought on by climate change. They also are preparing a Planning Guidance Policy that can be used by cities and San Mateo County to account for climate-driven flooding, stormwater capture, groundwater rise, and sea level rise in planning documents, processes, and approvals.

San Mateo County Flood Control District

The San Mateo County Flood Control District provides financing for flood control projects and manages the larger network of pipes, trenches, culverts, detention basins, and open channels throughout the district.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating hydrology and water quality impacts resulting from planned development within the City including the following:

Policy/Action	Description
EM-5.1	Reduce the discharge of toxic material into the city's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).
EM-5.7	Encourage site designs that manage the quantity and quality of storm water run-off.
EM-5.10	Implement the NPDES Stormwater Permit and for those properties exempt from the Permit, require a stormwater pollution prevention plan, including use of best management practices, to control erosion and sedimentation during construction.
ESPS-2.1	Improve and maintain City storm drainage infrastructure in a manner that reduces flood hazards.
ESPS-2.2	Maintain and prioritize restoration of a healthy riparian corridor in City-maintained flood control channels such as Pulgas Creek and Belmont Creek to reduce the risk of flooding due to erosion, siltation, blockage, and heavy undergrowth; and increase community access to channels with improved stormwater and flood management strategies.
ESPS-2.4	Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.
ESPS-2.5	Evaluate flood hazards on a watershed level, taking into account all sources of water and the eventual end point of each source.
ESPS-2.9	Reduce losses due to flooding by encouraging property owners who experience flood damage to reconstruct their properties in a flood-resistant manner.
ESPS-2.10	Incorporate stormwater drainage systems in development projects to effectively control the rate and amount of runoff, so as to prevent increases in downstream flooding potential.
ESPS-12.2	Ensure the San Carlos municipal code protects development from rising groundwater levels. This may include measures to protect underground utilities from constant submersion, the construction of building foundations and roadbeds in saturated soils, the protection of underground structures, and the management of groundwater dewatered during construction.

San Carlos Climate Mitigation and Adaptation Plan

The 2021 CMAP is San Carlos' strategic plan to reduce GHG emissions and to adapt to changing climate conditions. Potential consequences of climate change include inland flooding, sea level rise, and bayshore flooding. The CMAP includes strategies for mitigating the effects increased flooding due to sea level rise and reducing damage from flooding through establishment of setbacks.

City of San Carlos Citywide Storm Drain System Master Plan

The City of San Carlos prepared a Citywide Storm Drain System Master Plan (SDMP) in April 2017. The SDMP describes the City's stormwater and drainage system and identified causes of flooding within the system to assist in development systemwide improvements. Hydraulic modeling of the citywide drainage system was conducted, and the results were used to develop alternative

improvement projects to improve system capacity. These alternatives were ranked to develop a prioritized Capital Improvement Program (CIP) that addresses capacity issues and seeks to prioritize the more severe flooding problems.

City of San Carlos Green Infrastructure Plan

Adopted in 2019, the Green Infrastructure Plan describes how the City will, over time, transition its existing "gray" (i.e., traditional) infrastructure to "green" infrastructure. This document also provides guidance to meet stormwater pollutant load reduction goals and creates a process for prioritizing the integration of Green Infrastructure (GI) into CIP projects. Green infrastructure uses vegetation, soil, and other elements to capture, treat, infiltrate and slow urban runoff. GI measures could include stormwater planters, rain garden, tree wells, pervious pavement, infiltration systems, and green roofs.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to hydrology and water quality:

- Chapter 8.60, Mandatory Organic Waste Disposal Reduction, adopts the requirements of the MWELO.
- Chapter 12.08, Grading and Excavation, requires a grading permit to be submitted and approved by the City prior to the start of construction activities and must include an interim and final erosion and sediment control plan. In addition, no grading shall be conducted in such a manner as to alter the established gradient of natural drainage channels in a manner to cause excessive erosion or flooding.
- Chapter 13.14, Stormwater Management and Discharge Control, prohibits the discharge of non-stormwater discharges to the City storm drain system. All projects that will or may result in pollutants entering the City storm drain system must comply with Section 13.14.110 to reduce such pollutants, including standards for parking lots and similar structures, and BMPs for new development and redevelopment projects. In addition, this chapter provides for watercourse protection to ensure that all watercourses are kept and maintained reasonably free from pollutants and flow restrictions and for the maintenance of healthy bank vegetation.
- Chapter 15.56, Flood Damage Prevention, promotes public health, safety and general welfare, and to minimize public and private losses due to flood conditions in specific areas. Nonresidential construction shall either be elevated to or above the base flood elevation or be floodproofed so that the below the base flood level the structure is watertight with walls substantially impermeable to the passage of water or have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.

- Chapter 17.16.270, Storm Drainage Facilities, requires the subdivider to dedicate rights-of-way for storm drainage purposes that conform to the boundary lines of any natural watercourse, channel, stream, or creek that traverses the subdivision.
- Chapter 18.18.080, Water Efficient Landscaping, establishes water-efficient landscape and irrigation guidelines to promote the conservation and efficient use of water and minimize runoff with the use of automatic control systems.

3.10.1.2 *Existing Conditions*

Hydrology and Drainage

San Carlos is located within the San Francisco Bay watershed, which is further divided into sub-watersheds. The Plan is located in the Belmont Creek sub-watershed. Belmont Creek Watershed is approximately 511 acres and is shared with the City of Belmont to the north. Belmont Creek traverses east through San Carlos, and then flows northward east of Highway 101 and flows into the West Redwood Shores outfall and to Belmont Slough and O'Neill Slough.

Surface Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies (such as Belmont Creek) can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from dispersed or areawide sources, known as non-point source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Urban stormwater runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, animal feces, etc.), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain. Existing water quality within the San Carlos is affected by a wide range of inputs, from surface water runoff to pollutant input to groundwater.

Storm Drainage System and Flooding

<u>Storm Drainage System</u>

The City of San Carlos has a layout that drains roughly from the hills at the west side of the City to the east side towards San Francisco Bay. The City's storm drainage system consists of a combination of underground piping networks, conveyance channels, creeks, ditches, pump stations, and overland flow.

The Plan area is a low-lying region in the east side of San Carlos and faces multiple flooding threats. Stormwater in the Plan flows to the bay through the Harbor Industrial District Canal along Holly Street and under U.S. 101. The storm water system in the Plan is undersized for a 10-year storm and requires improvements to prevent localized flooding.[86] Refer to Section 3.19.1.2 for additional information on the existing stormwater system.

[86] Schaaf & Wheeler. *Industrial Road Drainage Study.* 2004.

Flooding

As shown on Figure 2.4-14, the Plan is located within the 500-year and 100-year flood zone. According to the Flood Impact Study, Belmont Creek and the Harbor Industrial Canal experience overtopping near Industrial Road. Both are subject to sedimentation from alluvial and/or tidal sources. Furthermore, Belmont Creek and the Harbor Industrial Canal are subject to downstream backwater effects due to high tides in the San Francisco Bay. Backwater effects lead to an increase in the water surface elevation, which will decrease the capacity of the upstream stormwater system.

Tsunami and Seiche Zones

A tsunami is a sea wave generated by an earthquake, landslide, or other large displacement of water in the ocean. Tsunami inundation maps have been developed that show tsunami hazard zones for the San Francisco Bay area. There are no tsunami hazard zones within the City of San Carlos (including the Plan area).[87]

Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, swimming pools, or semi-enclosed bodies of water, such as San Francisco Bay. The Plan is located approximately 2.7 miles from the bay and would not be expected to be inundated by a seiche.

Groundwater

San Carlos is located within the San Mateo Plain Subbasin of the Santa Clara Valley Groundwater Basin. The San Mateo Plain Subbasin is designated as a very low priority basin and therefore is not regulated under the Sustainable Groundwater Management Act.[88] This is because there is very little groundwater use in this basin (less than 2,700 acre-feet/year) and it is mostly due to private well pumping in the subbasin areas south of the City Limits (Redwood City and Menlo Park).

Shallow groundwater is typically encountered in San Carlos at depths ranging from four to eight feet bgs.[89]As discussed in Section 3.9 Hazards and Hazardous Materials, contaminated groundwater is present in the Plan due to past and current uses.

Sea Level Rise

According to OneShoreline, San Mateo County as a whole is the most vulnerable county in California to sea level rise because of its extensive coastline and Bay shoreline and the number of people and value of properties and critical assets in sea level rise-prone areas. Along the shoreline of the City, sea levels are projected to rise approximately two feet by 2050 and up to seven feet by 2100 (depending on the scenario).[90] Elevations in the Plan area range from 13 to 50 feet above sea level.

[87] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.
[88] Ibid.
[89] Ibid.
[90] Ibid.

Rising sea levels can also cause the shoreline to flood more frequently and severely during storms or king tide events. King tides are abnormally high, predictable astronomical tides that occur about twice per year, with the highest tides occurring when the earth, moon, and sun are aligned. Because sea level rise will cause ocean levels to be higher during normal conditions, shoreline floods can reach further onto land. Rising tides may also increase groundwater levels, inundating contaminated soils.

3.10.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hydrology and water quality, would the project:

1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - result in substantial erosion or siltation on- or off-site;
    - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
    - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    - impede or redirect flood flows?
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

3.10.2.1 *Project Impacts*

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Implementation of the Plan could impact water quality during and post-construction of future development.

Construction Water Quality

Future development under the Plan could require demolition of buildings constructed or remodeled between January 1, 1950 and December 31, 1980, which may contain building materials with PCBs. During demolition, building materials containing PCBs would impact stormwater quality if not properly abated. Compliance with MRP Provision C.12.f would ensure buildings with the potential to include PCBs are identified, samples taken and tested per established standards, and abated in accordance with existing regulations.

Future excavation and grading of sites within the Plan could result in sediment and other pollutants being transported from active construction sites to nearby waterways and San Francisco Bay through soil erosion, stormwater runoff, and/or wind-blown dust. To reduce water quality impacts during construction, future development projects that would disturb one acre or more of soil are required to comply with the statewide NPDES Construction General Permit to reduce runoff and pollution in runoff from construction activities, including preparation of a NOI and SWPPP, and implementation of stormwater control BMPs. In the event contaminated groundwater is encountered during future construction activities, all dewatering activities would be conducted in accordance with the requirements of the RWQCB and the City's Municipal Code, which would ensure that contaminated groundwater is disposed of properly and is not discharged into the storm drain system. If construction dewatering is required with future development within the Plan, an application for a groundwater waste discharge permit must be completed and submitted to the City for review and approval. Required information includes the source and estimated discharge volume, proposed discharge point to the sewer system and list of contaminants (if present) and expected concentration. The applicant may be required to collect groundwater samples representative of the water quality anticipated in the discharge if construction dewatering occurs in an area of known or potential groundwater contamination. As a result, water quality impacts associated with construction activities would be less than significant.

Post-Construction Water Quality Impacts

To reduce water quality impacts post-construction, future developments that create or replace 5,000 square feet or more of impervious surface area are required to comply with the MRP (including Provision C.3 and C.6). These regulated projects would be required to submit a Stormwater Control Plan (SCP) and C.3 and C.6 Development Review Checklist with building plans, to be reviewed and approved by the City of San Carlos. The SCP would incorporate LID features, such as self-treating and self-retaining areas to allow on-site retention, percolation, and evaporation of stormwater runoff.

Additionally, all development under the proposed Plan would be required to comply with the requirements of the SCMC, which prohibits illicit discharge into the storm drain system and includes policies to reduce the pollutants in stormwater (Chapter 13.14.070) and protect the water quality of watercourses (Chapter 13.14.120). All developments that discharge storm water associated with industrial activity shall also comply with the requirements of the General Industrial Permit (Order No. 2014-0057-DWQ, last amended in 2018).

Future development under the Plan in compliance with existing regulations including the MRP, Construction General Permit, and SCMC would not result in significant water quality impacts during construction or post-construction. **(Less than Significant Impact)**

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

Groundwater Recharge

Construction dewatering could temporarily affect groundwater recharge. As discussed in Section 3.10.1.2 Existing Conditions, groundwater is typically encountered in San Carlos at depths ranging from four to eight feet bgs. It is possible that future development under the Plan could encounter groundwater and dewatering may be required. As discussed under checklist question a), all dewatering activities would be conducted in accordance with the requirements of the RWQCB and the City's Municipal Code. While construction dewatering could have a temporary effect on the shallow groundwater aquifer, this effect would be limited in terms of the quantity of water withdrawn and the duration of the withdrawal. Therefore, construction dewatering would result in a less-than-significant impact in terms of groundwater recharge.

Groundwater Use

As discussed in Section 3.10.1.2 Existing Conditions, there is very little groundwater use in Santa Clara Valley Groundwater Basin. This basin is also designated as a very low priority basin and therefore is not regulated under the Sustainable Groundwater Management Act. Groundwater is not used for municipal water supply in the city (refer to Section 3.19 Utilities and Service Systems).

As described above, future development under the Plan would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Erosion and Siltation

Belmont Creek makes up the northern boundary of the Plan. The Plan would not result in direct impacts to Belmont Creek. The Plan would implement a 35-foot setback from the existing top of

bank. As discussed in Section 2.3.2.2 Pedestrian and Bicycle Improvements, the Plan would implement a 10-foot-wide trail along Belmont Creek. It is anticipated that future development along Belmont Creek would implement the trail. Alterations to the creek are not proposed as part of the Plan and future projects adjacent to the creek would be evaluated pursuant to CEQA once a project-level design is available.

Under existing conditions, current land uses in the Plan are mostly light industrial, research and development, and warehousing type uses. Implementation of the Plan would result in new multi-family residential uses and non-residential uses. As discussed in Section 2.3.5 of this EIR, the Plan would require 15 percent open space dedication for all new development greater than one acre. Further, all new residential development would be required to comply with SCMC Section 17.32.030 and provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere. The Plan would include green stormwater infrastructure improvements along all roadways. Therefore, buildout under the Plan would reduce impervious surfaces. This net decrease in impervious surfaces would result in a corresponding decrease in stormwater runoff. Further, future redevelopment under the Plan would be subject to Provision C.3 of the MRP, which requires implementation of stormwater treatment measures that would collect and treat stormwater runoff from all on-site impervious areas prior to discharge into the City's storm drain system.

Flooding On- or Off-Site

As discussed above, the Plan would not result in direct impacts to Belmont Creek. The Plan area is largely developed and buildout under the Plan would result in a reduction of impervious surfaces. Therefore, there is little potential for an increase in rate or volume of surface runoff. Based on the Flood Impact Study prepared for the Plan, it was determined that 100-year runoff would decrease by three percent under the Plan compared to existing conditions. Therefore, the Plan would not result in any significant increase in flooding downstream.

Stormwater Drainage System Capacity

As discussed in Section 2.3.4 Utility Improvements, future development under the Plan would require construction of new storm drain pipes or development would be required to pay a fair share contribution to the improvement. With the implementation of these improvements, it is anticipated that 10-year flood depths would improve under buildout of the Plan. As discussed in Section 2.3.5 Resiliency Standards, all future development in the Plan would be required to prepare a project-specific hydrology and hydraulic analysis to demonstrate that peak stormwater flow is reduced compared to pre-development conditions at the point of connection to the existing storm drain system.

Impede or Redirect Flows

As discussed in Section 2.3.5 Resiliency Standards, the Plan incorporates the following resiliency standards:

Resiliency Project Requirements:

- All new development within the Plan, regardless of whether the site is located within the 100-year flood zone shall adhere to the San Carlos Municipal Code, Chapter 15.56 - Flood Damage Prevention.
- Critical site infrastructure (such as transformers and generators) shall be elevated to provide resilience to current and future flooding conditions in the area.
- The City of San Carlos shall determine on a case by case basis if an individual project requires a building height variance to accommodate proposed finished floor elevations that have been elevated to provide flood resilience.
- For any new development within a 100-year flood zone, the project would be required to set the finished floor elevation above the 100-year BFE.
- Future development shall assess sea level rise risk for the site and elevate the finished floor elevation of the new building further above the 100-year BFE to provide resiliency to future sea level rise (2050).

With the incorporation of the above Plan resiliency standards, buildout under the Plan would not result impacts related to impeding or redirecting flood flows.

With compliance with the MRP, SCMC, and the Plan's resiliency standards, future development would not result in substantial erosion or siltation and would not substantially increase the rate of surface runoff which would result in flooding, impede or redirect flood flows, or exceed the capacity of the drainage system. **(Less than Significant Impact)**

d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

As discussed in Section 3.10.1.2 Existing Conditions, the Plan area would not be subject to inundation from a tsunami or seiche. Future development projects could involve development of some properties located in FEMA 100-year flood zones (refer to Figure 2.4-14).

As discussed under checklist question c), future development in 100-year flood zones would be subject to floodplain requirements listed in SCMC Chapter 15.56. Additionally, any new development within a 100-year flood zone would be required to set the finished floor elevation above the 100-year BFE. Future development would also be required to assess sea level rise risk for the site and elevate the finished floor elevation of the new building further above the 100-year BFE to provide resiliency to future sea level rise (2050).

As discussed in Section 3.9 Hazards and Hazardous Materials, past and current uses of properties in the Plan have impacted soil, soil vapor and/or groundwater due to activities that involve the handling and storing of hazardous substances such as petroleum hydrocarbons, metals, VOCs and PCBs. Consistent with General Plan polices ESPS-5.3, ESPS-5.5 and ESPS-5.6, future development would be required to mitigate any significant hazard to the public or the environment through the

disturbance of contaminated soil, soil vapor, and groundwater. The use, storage, transport, and disposal of hazardous materials by future residents and commercial and industrial tenants/owners would be required to comply with existing regulations that apply to the uses that involve transporting, using, or disposing of hazardous materials include RCRA, CERCLA, and CCR Title 22 (refer to Section 3.9.1.1 Regulatory Framework). SCMC Title 13 also requires that individual business plans for any facility subject to the hazardous materials inventory response program include a program for compliance. For these reasons, the Plan would not substantially increase the risk of release of pollutants due to inundation in the 100-year flood zone. **(Less than Significant Impact)**

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Water Quality Control

As discussed under checklist question a), future development under the Plan would comply with the statewide NPDES Construction General Permit to reduce runoff and pollution in runoff from construction activities, including preparation of a NOI and SWPPP, and implementation of stormwater control BMPs. In the event contaminated groundwater is encountered during future construction activities, all dewatering activities would be conducted in accordance with the requirements of the RWQCB and the City's Municipal Code. Post-construction, future development that creates or replaces 5,000 square feet or more of impervious surface area are required to comply with the MRP (including Provision C.3 and C.6). Additionally, all development under the proposed Plan would be required to comply with the requirements of the SCMC, which prohibits illicit discharge into the storm drain system and includes policies to reduce the pollutants in stormwater (Chapter 13.14.070) and protect the water quality of watercourses (Chapter 13.14.120). All development that discharges storm water associated with industrial activity shall also comply with the requirements of the General Industrial Permit (Order No. 2014-0057-DWQ, last amended in 2018). Thus, the project would not conflict with or obstruct implementation of the San Francisco Bay Basin Plan.

Groundwater Management Plan

As discussed under checklist question b), the San Mateo Plain Subbasin of the Santa Clara Valley Groundwater Basin is designated as a very low priority basin and therefore is not regulated under the Sustainable Groundwater Management Act. As described under checklist question b), future development under the Plan would not substantially decrease groundwater supplies or substantially interfere with groundwater recharge.

With adherence to the requirements of the RWQCB and the City's Municipal Code, future development under the Plan would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

3.10.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact?

The 2045 General Plan Reset EIR concluded that cumulative hydrology impacts in the City would be less than significant with adherence to existing water quality regulations, including the SCMC and NPDES Construction General Permit,

Water Quality Standards and Discharge Requirements

All cumulative projects would be required to adhere to state and local regulations to comply with water quality standards and waste discharge requirements, thereby resulting in less than significant impacts to surface or ground water quality. These regulations are in place to ensure individual projects do not result in a significant cumulative impact.

Groundwater Supplies and Recharge

As discussed under checklist question b), groundwater is not used for municipal water supply in the City. For these reasons, future cumulative development would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

Alteration of Existing Drainage Patterns

Cumulative projects would be required to adhere to existing regulations (including the Construction General Permit and Provision C.3) to manage stormwater runoff and erosion and reduce impacts to a less than significant level. These regulations are in place to ensure individual projects do not result in a significant cumulative impact.

Project Inundation

Any risk of project inundation due to floods, tsunamis, or seiches resulting in the release of pollutants would be reduced to a less than significant level by compliance with existing regulations regarding the use, storage, transport, and disposal of hazardous materials, as well as Provision C.3 of the RWQCB Municipal Regional NPDES Permit. The Plan area is not subject to seiches or tsunamis. Therefore, the cumulative projects would not result in a cumulatively significant risk of pollutant release due to inundation.

Conflicts with Water Quality Control and Sustainable Groundwater Management Plans

All cumulative projects would be required to adhere to existing regulations to ensure compliance with water quality control plans. The plans are in place to ensure individual projects do not result in a cumulative impact to water quality or groundwater management. For these reasons, the Plan

would not contribute to a cumulatively significant impact related to a water quality control plan or sustainable groundwater management plan.

With adherence to standard permit conditions and existing regulations, the Plan would have a less than significant cumulative impact on hydrology and water quality. **(Less than Significant Cumulative Impact)**

3.11 Land Use and Planning

3.11.1 Environmental Setting

3.11.1.1 *Regulatory Framework*

Federal

Federal Aviation Administration

FAA Regulations set standards for obstructions to airspace. The City of San Carlos is required to comply with these, and other FAA regulations and policies intended to protect the San Carlos Airport and aircraft in flight from incompatible land uses that potentially create hazards or constraints to airport operations. The FAA requires projects of a specific height in a given location within the Notification Surface area to submit a notice for airspace safety review (see Section 4.9.1.1).

Local

Airport Land Use Compatibility Plan

The /CAG Board of Directors serves as the airport land use commission for San Mateo County. The Airport Land Use Commission reviews proposals for general plans, specific plans, zoning ordinances, and land use development proposals in the vicinity of the San Carlos Airport to ensure that future land uses in the surrounding area remain compatible with the realistically foreseeable, ultimate potential aircraft activity. The ALUCP for the three public airports in San Mateo County are adopted by C/CAG, the ALUC responsible for promoting land use compatibility around the County's airports in order to minimize public exposure to excessive noise and safety hazards. Amendments were most recently made to the San Carlos ALUCP in 2022. The ALUCPs describe a series of land use safety and compatibility zones and associated guidelines for development around each airport that are intended to prevent development that is incompatible with airport operations. These regulations include height restrictions based on proximity to the airport and flight patterns. The ALCUPs delineate two AIAs, Area A and Area B, within proximity to each airport. As a requirement for development located in Area A, the presence of existing airports within two miles of the property must be disclosed in the notice of intention to offer the property for sale. For development located within Area B of the AIA, the C/CAG Board shall exercise its statutory duty to review proposed land development proposals, among other plans, ordinances, amendments, and actions.

The Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Carlos Airport adopted in 2015 sets forth land use compatibility criteria, compatibility zones, development standards, and policies pertaining to noise, safety, airspace protection, and overflight standards, and establishes the planning boundaries that define height, tall structures, noise, and safety zones for policy implementation.

The ALCUP is divided into six safety zones. These zones include the (1) Runway Protection Zone, (2) Inner Approach/Departure Zone, (3) Inner Turning Zone, (4) Outer Approach/Departure Zone, (5) Sideline Zone, and (6) Traffic Pattern Zone. The majority of the Plan is located in Zone 6, however, a small portion of the PAMF site is within Zone 3. Commercial (i.e., office and retail), manufacturing, R&D, industrial uses, and residential are all considered compatible uses in Safety Zone 6. Schools and daycares would be conditionally compatible in Zone 6.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating land use impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.3	Ensure that development within the TOD corridor maintains and improves the mobility of people and vehicles along and across the corridor.
LU-1.4	Establish and support the El Camino Real/Caltrain multimodal TOD corridor for the purpose of the mobility of people and vehicles along and across the corridor.
LU-1.5	Support land use patterns in the TOD corridor that will attract and serve riders of public transit.
LU-3.9	Promote development opportunities for regular physical activity by locating residential developments near services.
CSH-3.4	Support Smart Growth and Sustainability principles to reduce travel time from housing to jobs, provide affordable transportation to all members of the community, allow compact mixed-use development and decrease dependency on automobiles.
CSH-6.2	Support transit oriented development with mixed, dense land use that reduces the need to travel and that is linked to good transit. The City shall work with local, regional, and State representatives to encourage the support and funding of transit-oriented development projects.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to land use and planning as follows:

- Title 17, Subdivisions, regulates and controls the design and improvement of subdivisions and to ensure their compliance with applicable policies and regulations of the City of San Carlos. Within this title the Subdivisions Maps Act is implemented.
- Title 18, Zoning Code, divides the city into distinct zones in order to implement the land use and development policies in the General Plan. Among the primary objectives of the Zoning Code are the regulation of building form, placement, density, and the provision of sufficient parking and open spaces in conjunction with development.

3.11.1.2 *Existing Conditions*

General Plan Designations and Zoning

As described in Section 2.1 of this EIR, the entire Plan has a current General Plan land use designation of Planned Industrial. This Planned Industrial land use designation allows research and development, biotechnology (biotech), light industrial, flex, warehousing, and related uses.
As shown in Figure 2.2-1, the Plan currently has three zoning districts: Light Industrial, Industrial Professional, and Planned Development. Refer to Table 2.2-1 for a summary of the intended uses under each zoning district.

Surrounding Land Uses

The area surrounding the Plan area is urbanized. The Greater San Carlos Neighborhood, which is located south of the Plan area, consists of single-family detached housing. Belmont Creek makes up the northern boundary of the Plan, north of which is the City of Belmont. The closest development to the Plan in the City of Belmont consists of one to two story industrial land uses along Harbor Boulevard. East of the Plan area is U.S. 101, which is adjacent to a mix of commercial and industrial land uses. West of the Plan area is CA-82, Caltrain tracks, and residential and commercial land uses.

3.11.2 Impact Discussion

For the purpose of determining the significance of the project's impact on land use and planning, would the project:

1) Physically divide an established community?
2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.11.2.1 *Project Impacts*

a) Would the project physically divide an established community?

A physical division of an established community typically refers to the construction of a physical feature (such as a wall, roadway, or railroad tracks) or the removal of a means of access (such as a local roadway or bridge) that would impair mobility within an existing community or between communities.

The implementation of the Plan would allow for the addition of 1,890 residential units (where none exists today) and the overall intensification of non-residential development within the Plan area. The total amount of non-residential development would increase by 4,508,000 square feet. While the project would allow for growth and development in the Plan, the area is separated from the majority of the adjacent communities by roadways. For example, the Plan area is separated from

the existing residential community to the west by Old County Road, CA-82, and Caltrain tracks. U.S. 101, a six-lane freeway, separates the Plan area from the commercial and industrial land uses to the east. The Greater San Carlos neighborhood, located south of the Plan, would not be separated from the Plan by a roadway.

One of the primary objectives of the Plan is to improve mobility throughout the Plan through the creation and enhancement of connections to transit, pedestrian, and bicycle facilities. As discussed in Section 2.3.2 Circulation Improvements, implementation of a new north-south street segment connecting Quarry Road to Bragato Road is proposed as part of the Plan to facilitate connectivity within the Plan. Additionally, the Plan would include pedestrian and bicycle improvements to create opportunities for a variety of travel options. Industrial Road, Old County Road, and Taylor Way would have two-way protected bike lanes. The Plan would include three pedestrian paseos, one along the new north-south street connecting Bragato Road to Quarry Road, and two along Bragato Road to facilitate more connectivity and accessibility in the district. A proposed trail along Belmont Creek would provide an additional walking route to connect Old County Road to Industrial Road. The Plan would also implement various intersection improvements and traffic calming measures (refer to Section 2.3.2 Circulation Improvements).

Furthermore, the Plan does not include the provision of dividing infrastructure such as highways or railways that could be expected to physically divide existing, adjacent communities. For these reasons, the Plan would improve connectivity between the Plan area and adjacent communities and would not physically divide an existing community. **(Less than Significant Impact)**

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

The Plan would introduce Mixed-Use, 75-90 du/acre as a new land use classification in the Plan area and would allow for a variety of zoning districts (see Table 2.3-2) to facilitate redevelopment and growth in the Plan area. As a result, Plan buildout would result in a net increase of 4,508,000 square feet of non-residential land uses and 1,890,000 square feet (i.e. 1,890 units, assuming 1,000 square feet per unit) of residential land uses.

The associated growth resulting from buildout of the Plan was analyzed in the buildout projections for the 2045 General Plan Reset. The 2045 General Plan Reset EIR concluded that buildout under the General Plan would not cause a significant environmental impact due to a conflict with any plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental affect. Both the 2045 General Plan Reset EIR and this EIR for the Plan have been prepared for the purpose of evaluating growth in the Plan area.

Development within the Plan area would be subject to the design review and objective design standards compliance review process required by Section 18.29 of the Zoning Code, which requires design review for projects that require a permit for new construction, reconstruction, rehabilitation,

or alteration. This review process ensures that all future redevelopment projects under the Plan would be evaluated for their compatibility with their surroundings, harmonious transitions in scale and character between different land uses, safety, integration of natural features, appropriate construction materials, and other aspects.

As discussed above in Section 3.11.1.1, the majority of the Plan is located in Zone 6 of the ALCUP. Commercial (i.e., office and retail), manufacturing, R&D, industrial uses, and residential are all considered compatible uses in Safety Zone 6. Schools and daycares would be conditionally compatible in Zone 6. As such, future uses in the Plan would comply with the ALUC's safety compatibility criteria. For these reasons, the Plan would not result in a significant impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

3.11.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact?

The geographic area for cumulative land use impacts is the City of San Carlos.

Established Community

As discussed under checklist question a), the Plan would improve mobility through the creation and enhancement of connections to transit, pedestrian, and bicycle facilities. Furthermore, the Plan does not include the provision of dividing infrastructure such as highways or railways that could be expected to physically divide existing adjacent communities. For these reasons, the Plan would not result in a cumulatively considerable contribution to the division of an established community.

Land Use Plan

Land uses in the City are regulated by the 2045 General Plan Reset. The 2045 General Plan Reset EIR concluded that implementation of buildout under the General Plan Reset, in accordance with its policies and programs, along with mitigation measures, would not result in a cumulatively significant land use and planning impact. Future development under the Plan, in combination with cumulative projects, would continue to be subject to the policies and programs of the 2045 General Plan Reset. For these reasons, the project would not result in a significant cumulative land use impact. **(Less than Significant Cumulative Impact)**

3.12 Mineral Resources

3.12.1 Environmental Setting

3.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

California Geological Survey

As mandated by SMARA, the CGS has classified lands within the San Francisco-Monterey Bay region into Mineral Resource Zones (MRZs) based on the California State Mining and Geology Board guidelines. Areas with an MRZ-1 designation have sufficient information available indicating that there is little to no likelihood of significant mineral deposits. MRZ-2 areas are those where adequate information indicates that significant deposits are present. Areas classified as MRZ-3 contain mineral deposits, but their significance cannot be evaluated from available data. Areas are classified as MRZ-4 where available information is inadequate for assignment to any other MRZ category.

3.12.1.2 *Existing Conditions*

No portion of San Carlos is designated by the California Department of Conservation as having the potential for being a significant source of composite materials or industrial minerals.

3.12.2 Impact Discussion

For the purpose of determining the significance of the project's impact on mineral resources, would the project:

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

3.12.2.1 *Project Impacts*

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?

There are no mineral extraction sites, and no known mineral resources are present within the Plan area. Therefore, the Plan would not result in impacts to mineral resources. **(No Impact)**

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

As noted above, there are no mineral resources (including recovery sites) in San Carlos. Therefore, the Plan would not result in impacts to mineral resource recovery sites. **(No Impact)**

3.12.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact?

As discussed above under checklist question a) and b), the Plan area is not designated as a mineral resource recovery site, nor does it contain any known mineral resource. Implementation of the Plan, therefore, would not contribute to a cumulative impact on mineral resources. **(Less than Significant Cumulative Impact)**

3.13 Noise

The following discussion is based, in part, on a Noise and Vibration Assessment completed by Illingworth & Rodkin, Inc. dated April 3, 2025. This report is included as Appendix F to this EIR.

3.13.1 Environmental Setting

3.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[91] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

[91] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

3.13.1.2 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 3.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 3.13-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83

Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual.* September 2018.

State and Local

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

California Department of Transportation

Caltrans recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards. A conservative vibration limit of 0.25 to 0.30 in/sec PPV has been used for older buildings (i.e. pre-1945) that are found to be structurally sound but cosmetic damage to plaster ceilings or walls is a major concern. For buildings that are documented to be structurally weakened, a conservative limit of 0.08 in/sec PPV is often used to provide the

highest level of protection. All of these limits have been used successfully and compliance to these limits has not been known to result in appreciable structural damage. All vibration limits referred to herein apply on the ground level and take into account the response of structural elements (i.e. walls and floors) to groundborne excitation.

California Airport Noise Regulation

The California Airport Noise Regulation (California Code of Regulations Title 21, Division 2.5, Chapter 6) identifies the 65 CNEL contour for aircraft operations at an airport as the Noise Impact Boundary. Within the Noise Impact Boundary, the airport proprietor is required to ensure that all land uses are compatible with the aircraft noise environment, or the airport proprietor must secure a variance from Caltrans.

San Carlos Airport Land Use Compatibility Plan

As previously discussed in Section 3.11.1.1, the San Carlos ALUCP ensures the safety of airport operations. According to the ALUCP's (2013) Aircraft Noise Contours, the eastern portion of the Plan lies within the 60 dBA CNEL noise contour, however the entire Plan Area is outside of the boundary for 65 CNEL. [92]

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating noise and vibration impacts resulting from planned development within the City including the following:

Policy	Description
NO-1.1	Use the Noise and Land Compatibility Standards shown in Figure 9-1 (refer to Table 3.13-2 below), the noise level performance standards in Table 9-1 (refer to Table 3.13-3) and the projected future noise contours for the General Plan shown in Figure 9-3 and detailed in Table 9-2, as a guide for future planning and development decisions.
NOI-1.2	Minimize noise impacts on noise-sensitive land uses. Noise-sensitive land uses include residential uses, retirement homes, hotels/motels, schools, libraries, community centers, places or public assembly, daycare facilities, churches and hospitals.
Noi-1.3	Limit noise impacts on noise-sensitive uses to noise level standards as indicated in Table 9-1.
NOI-1.4	Require a detailed acoustic report in all cases where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 CNEL L_{dn} or greater. If recommended in the report, mitigation measures shall be required as conditions of project approval.
NOI-1.5	New development of noise-sensitive land uses proposed in noise-impacted areas shall incorporate effective mitigation measures into the project design to reduce exterior and interior noise levels to the following acceptable levels.

[92] City/County Association of Governments of San Mateo County. *Comprehensive Land Use Compatibility Plan for the Environs of San Carlos Airport*. October 2015.

Policy	Description
	a. For new single-family residential development, maintain a standard of 60 L_{dn} (day/night average noise level) for exterior noise in private use areas. b. For new multi-family residential development maintain a standard of 65 L_{dn} in community outdoor recreation areas. Noise standards are not applied to private decks and balconies and shall be considered on a case-by-case basis in the downtown core. c. Interior noise levels shall not exceed 45 L_{dn} in all new residential units (single- and multi-family). Development sites exposed to noise levels exceeding 60 L_{dn} shall be analyzed following protocols in Appendix Chapter 12, Section 1208, A, Sound Transmission Control, 2001 Building Code Chapter 12, Appendix 1207.11.2 of the 2007 California Building Coe (or the latest version). d. Where new residential units (single- and multi-family) would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels inside homes shall not exceed 50 dBA in bedrooms or 55 dBA in other occupied spaces. These single event limits are only applicable where there are normally four or more train operations per day.
NOI-1.6	Where noise mitigation measures are required to achieve the noise level standards, the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered after practical design-related noise mitigation measures have been integrated into the project.
NOI-1.7	The City shall seek to reduce impacts from groundborne vibration associated with rail operations by requiring that vibration-sensitive buildings (e.g. residences) are sited at least 100 feet from the centerline of the railroad tracks whenever feasible. The development of vibration-sensitive buildings within 100 feet from the centerline of the railroad tracks would require a study demonstrating that groundborne vibration issues associated with rail operations have been adequately addressed (i.e., through building siting, foundation design and construction techniques).
NOI-1.8	All construction activities shall comply with the City's noise ordinance. Development projects that require an acoustical study shall incorporate reasonable noise and vibration reduction measures and best management practices to minimize excessive noise levels during all phases of construction activity. Reduction measures and best management practices may include, but are not limited to, noise control techniques for construction tools and equipment, construction site management techniques, temporary noise barriers, noise monitoring and reporting, and/or construction traffic management.
NOI-1.9	Minimize potential transportation-related noise through the use of setbacks, street circulation design, coordination of routing and other traffic control measures and the construction of noise barriers and consider use of "quiet" pavement surfaces when resurfacing roadways.
NOI-1.10	Ensure that mixed-use development projects are designed to minimize noise impacts on residential units.
NOI-1.11	Ensure that proposed noise sensitive land uses include appropriate mitigation to reduce noise impacts from aircraft operations at San Carlos Airport. Work with the San Carlos Airport Pilots Association and San Mateo County to continue to refine and implement the Airport's noise abatement procedures.
NOI-1.12	Ensure consistency with the noise compatibility policies and criteria contained in the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.
NOI-1.13	Require a noise analysis for new residential uses located within the 55 CNEL impact area of the San Carlos Airport. If recommended in the report, mitigation measures shall be required as conditions of project approval.
NOI-1.14	The Federal Transit Administration vibration impact criteria and assessment methods shall be used to evaluate the compatibility of train vibration with proposed land uses adjoining

Policy	Description
	the UPRR (Caltrain) corridor. Site specific vibration studies shall be completed for vibration-sensitive uses proposed within 100 feet of active railroad tracks.

Table 3.13-2: General Plan Land Use Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (L_{dn}) 55	60	65	70	75	80
Single-Family Residential						
Multi-Family Residential, Hotels and Motels		a				
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds						
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches						
Office Buildings, Business, Commercial and Professional						
Auditoriums, Concert Halls, Amphitheaters						

[a] See Policy NOI-1.5.

NORMALLY ACCEPTABLE. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements.

CONDITIONALLY ACCEPTABLE. Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.

UNACCEPTABLE. New construction or development should generally not be undertaken because mitigation is usually not feasible to comply with noise element policies.

Table 3.13-3: General Plan Non-Transportation Noise Standards

Land Use Receiving the Noise	Hourly Noise-Level Descriptor	Exterior Noise-Level Standard In Any Hour (dBA)		Interior Noise-Level Standard In Any Hour (dBA)	
		Daytime (7am-10pm)	Nighttime (10pm-7am)	Daytime (7am-10pm)	Nighttime (10pm-7am)
Residential	L_{eq}	55	45	40	30
	L_{max}	70	60	55	45
Medical, convalescent	L_{eq}	55	45	45	35
	L_{max}	70	60	55	45
Theater, auditorium	L_{eq}	--	--	35	35
	L_{max}	--	--	50	50
Church, meeting hall	L_{eq}	55	--	40	40
	L_{max}	--	--	55	55
School, library, museum	L_{eq}	55	--	40	--
	L_{max}	--	--	55	--

Notes:
1. The Residential standards apply to all residentially zoned properties.
2. Each of the noise levels specified above shall be lowered by 5 dBA for tonal noises characterized by a whine, screech, or hum, noises consisting primarily of speech or music, or recurring impulsive noises.
3. In situations where the existing noise level exceeds the noise levels indicated in the above table, any new noise source must include mitigation that reduces the noise level of the noise source to the existing level.
4. The exterior noise standards are measured at any point on the receiving property where there is, or could be in the future, frequent human use and quiet would be beneficial.
5. These standards do not apply to temporary sources such as construction activities.

City of San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to noise as follows:

- Chapter 9.30, Noise Control, declares that the policy of the City is to protect the peace, health and safety of its citizens from unnecessary and unreasonable noises produced by any machine, person or device. It shall also be the City's policy to continuously evaluate the noise levels specified in the body of this chapter and adjust them as quieter equipment becomes available or as demanded by State and Federal requirements.
    - Section 9.30.030, Basic Noise Regulation, states that, except as otherwise permitted under this chapter, no person shall cause and no property owner shall permit, as to property owned by him, a noise produced by any person, amplified sound or device, or any combination thereof in excess of ten dBA above the local ambient to emanate from any property, public or private, as measured at a distance of forty-nine feet beyond the property line.
    - Section 9.30.070, Exempt Activities, lists the following noise-generating activities that exempt from the provisions of SCMC Chapter 9.30:
        - Transportation facilities, such as freeways, airports, buses and railroads;

- Construction Activities; such activities, however, shall be limited to the hours of eight a.m. to five p.m., Monday through Friday and nine a.m. to five p.m. on Saturdays. No construction noise-related activities on Sundays and the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Juneteenth, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day;
- Home Workshop and Gardening Equipment; such activities, however, shall be limited to the hours of eight a.m. to sunset, Monday through Friday and ten a.m. to sunset on Saturday. No construction noise-related activities can occur on Sundays and certain holidays.
- Public works and public utilities activities, which shall be limited to the hours set forth under Subsection B above, except for emergency situations;
- Emergency vehicles;
- Solid waste pickup.

Section 18.21.050-A, Noise Limits, prohibits use or activity that create noise levels that exceed the established standards. The maximum allowable noise levels specified in SCMC Table 18.21.050-A, Noise Limits, (see Table 3.13-3, Non-Transportation Noise Standards) do not apply to noise generated by automobile traffic or other mobile noise sources in the public right-of-way. The maximum allowable noise levels in Table 3.13-3 (SCMC Table 18.21.050-A, Noise Limits) shall be adjusted according to the following provisions, with no more than one increase in the maximum permissible noise level applied to the noise generated on each property:

- Ambient Noise. If the ambient noise level at a noise-sensitive use is 10 dBA or more below the standard, the allowable noise standard shall be decreased by 5 dBA.
- Duration. The maximum allowable noise level (L_{50}) shall be increased as follows to account for the effects of duration:
  - Noise that is produced for no more than a cumulative period of fifteen minutes in any hour (L_{25}) may exceed the noise limit by 5 dBA; and
  - Noise that is produced for no more than a cumulative period of five minutes in any hour (L_8) may exceed the noise limits by 10 dBA;
  - Noise that is produced for no more than a cumulative period of one minute in any hour (L_2) may exceed the noise limits by 15 dBA.
- Character of Sound. If a noise contains a steady audible tone or is a repetitive noise (such as hammering or riveting) or contains music or speech conveying informational content, the maximum allowable noise levels shall be reduced by 5 dBA.

    - Prohibited Noise. Noise for a cumulative period of thirty minutes or more in any hour which exceeds the noise standard for the receiving land use is prohibited.
- Section 18.21.050-B, Noise Exposure, includes SCMC Table 18.21.050-B (see Table 3.13-4) which describes the requirements and limitations of various land uses within the listed day/night average sound level (L_{dn}) ranges.
- Section 18.21.050-C, Acoustic Study, permits the Director to require an acoustic study for any proposed project that could cause any of the following:
    - Create an inconsistency with the noise requirements of the San Carlos Airport as defined in Section 18.21.150, San Carlos Airport land use compatibility plan consistency;
        - Where applicable, noise attenuation measures may be required;
    - Cause noise levels to exceed the limits in Table 18.21.050-A (see Table 3.13-3);
    - Create a noise exposure that would require an acoustic study and noise attenuation measures listed in Table 18.21.050-B (see Table 3.13-4);
    - Cause the L_{dn} at noise sensitive uses to increase three dBA or more.
- Section 18.21.050-D, Establishing Ambient Noise, states that when the Director has determined that there could be cause to make adjustments to the standards, an acoustical study shall be performed to establish ambient noise levels. In order to determine if adjustments to the standards should be made either upwards or downwards, a minimum twenty-four-hour-duration noise measurement shall be conducted. The noise measurements shall collect data utilizing noise metrics that are consistent with the noise limits presented in SCMC Table 18.21.050-A, e.g., L max (zero minutes), L_{02} (one minute), L_{08} (five minutes), L_{25} (fifteen minutes) and L_{50} (thirty minutes). An arithmetic average of these ambient noise levels during the three quietest hours shall be made to demonstrate that the ambient noise levels are regularly ten or more decibels below the respective noise standards. Similarly, an arithmetic average of ambient noise levels during the three loudest hours should be made to demonstrate that ambient noise levels regularly exceed the noise standards.
- Section 18.21.050-E, Noise Attenuation Measures, states that any project subject to the acoustic study requirements of subsection C of this section may be required as a condition of approval to incorporate noise attenuation measures deemed necessary to ensure that noise standards are not exceeded.
    - New noise-sensitive uses (e.g., schools, hospitals, churches, and residences) shall incorporate noise attenuation measures to achieve and maintain an interior noise level of forty-five dBA.
    - Noise attenuation measures identified in an acoustic study shall be incorporated into the project to reduce noise impacts to satisfactory levels.

    - Emphasis shall be placed upon site planning and project design measures. The use of noise barriers shall be considered and may be required only after all feasible design-related noise measures have been incorporated into the project.
- Section 18.21.050-F, Airport Land Use Compatibility Plan Consistency, states that where required, conformance with applicable airport land use compatibility plan standards, as described in Section 18.21.150, San Carlos Airport land use compatibility plan consistency, is required.
- Section 18.21.060, Vibration, prohibits the production of vibration that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) are exempt from this standard.
- Section 18.21.150-C, Airport Noise Evaluation and Mitigation, requires all proposed development projects, alterations, or changes of use subject to the ALUCP to be reviewed for consistency with the noise policies of the ALUCP, including the avigation easement requirements of San Carlos ALUCP Noise Policy 7. Uses listed as “conditionally compatible” in the ALUCP will be required to mitigate impacts to comply with the interior noise standards established in the ALUCP or General Plan, whichever is more restrictive.

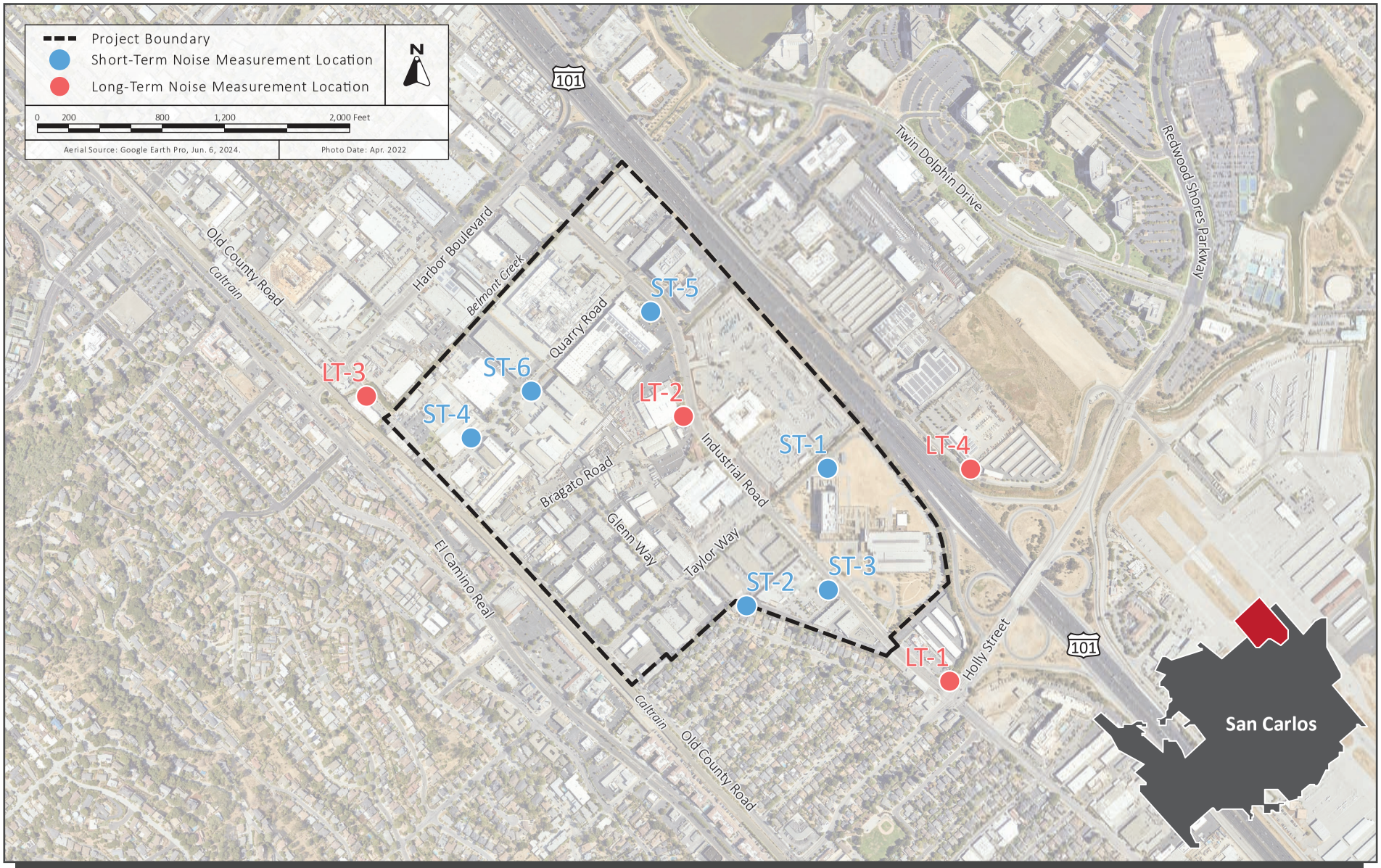
Table 3.13-4: Noise Exposure Requirements and Limitations

Land Use Receiving the Noise	Noise-Level Descriptor	Exterior Noise Level Standard in Any Hour (dBA)		Interior Noise-Level Standard in Any Hour (dBA)	
		Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
Residential	L_{50}	55	45	40	30
	L_{max}	70	60	55	45
Medical, convalescent	L_{50}	55	45	45	35
	L_{max}	70	60	55	45
Theater, auditorium	L_{50}	-	-	35	35
	L_{max}	-	-	50	50
Church, meeting hall	L_{50}	55	-	40	40
	L_{max}	-	-	55	55
School, library, museum	L_{50}	55	-	40	-
	L_{max}	-	-	55	-

3.13.1.3 *Existing Conditions*

The existing noise environment in the Plan area results primarily from traffic noise along U.S. 101, Holly Street, and Industrial Avenue. Traffic noise from other roads such as Harbor Boulevard, Old County Road, El Camino Real, and other minor roads also contributes to the noise environment. The Peninsula Corridor/Union Pacific railroad tracks are just southwest of Old County Road and are utilized primarily by Caltrain services. San Carlos Airport is located as close as 1,100 feet to the east of the Plan area. Operational noise from surrounding industrial land uses also contributes to the noise environment.

A noise monitoring survey consisting of four long-term (LT-1 through LT-4) and six short-term (ST-1 through ST-6) noise measurements was conducted within the study area and vicinity between Wednesday, January 25, 2023, and Friday, January 27, 2023. All noise measurement locations are shown in Figure 3.13-1 and short-term measurements are summarized in Table 3.13-5.



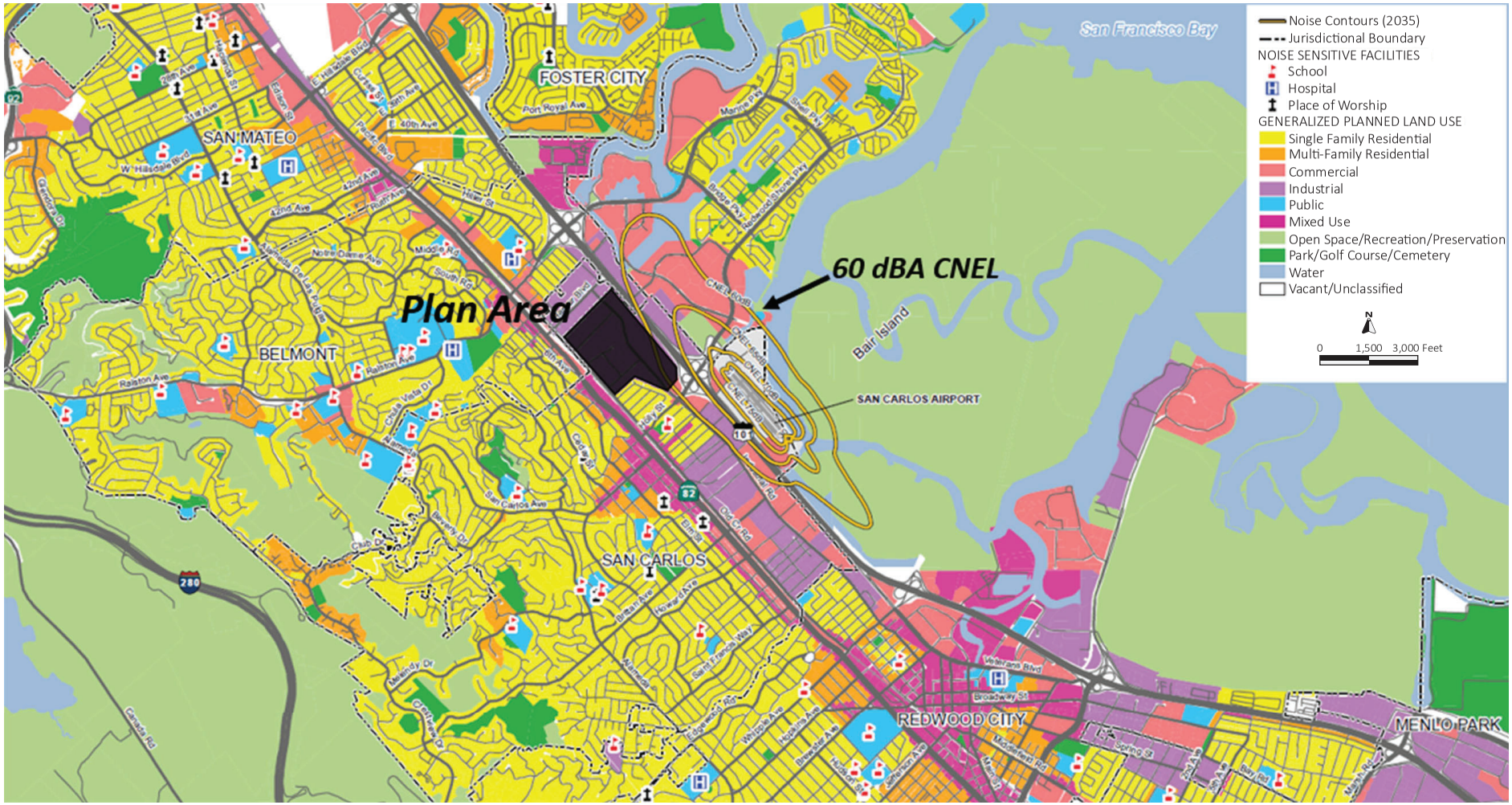
NOISE MEASUREMENT LOCATIONS | FIGURE 3.13-1

Table 3.13-5: Summary of Short-Term Noise Measurements (dBA)

Noise Measurement Location	Time	Measured Noise Level, dBA					
		L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	L_{eq}
ST-1: ~400 feet from the centerline of US 101	11:20-11:30	69	65	60	57	55	58
ST-2: ~520 feet from the centerline of Industrial Road	11:40-11:50	59	57	50	46	45	48
ST-3: ~65 feet from the centerline of Industrial Road	12:00-12:10	77	73	67	60	54	64
ST-4: ~30 feet from the centerline of Quarry Road	12:20-12:30	75	70	64	53	47	59
ST-5: ~75 feet from the centerline of Industrial Road	12:50-13:00	71	70	67	61	53	63
ST-6: ~60 feet from the centerline of Quarry Road	13:10-13:20	72	70	61	51	46	58

The San Francisco International Airport (SFO) is a public-use airport located approximately eight miles northwest of the Plan Area. According to the ALUCP for SFO,[93] the Plan lies well outside the 65 dBA CNEL/L_{dn} noise contour. The San Carlos Airport is located east of the Plan Area, opposite the U.S. 101/Holly Street interchange. As shown on Figure 3.13-2, the eastern corner of the Plan Area lies partially within the 60 dBA CNEL/L_{dn} noise contour, but the entire Plan Area lies outside the 65 dBA CNEL/L_{dn} noise contour.

[93] Ricondo & Associates, Inc. with Jacobs Consultancy and Clarion Associates, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, November 2012.



SAN CARLOS AIRPORT 2035 NOISE CONTOURS | FIGURE 3.13-2

3.13.2 Impact Discussion

For the purpose of determining the significance of the project's impact on noise, would the project result in:

1) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
2) Generation of excessive groundborne vibration or groundborne noise levels?
3) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

3.13.2.1 *Thresholds of Significance*

Construction Noise

SCMC Section 9.30.070 exempts construction noise during the hours of eight a.m. to five p.m., Monday through Friday, and nine a.m. to five p.m. on Saturday. No construction noise-related activities on Sundays and the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Juneteenth, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day. However, the City does not have established noise thresholds for construction noise impact analysis. Therefore, the analysis relies on the FTA construction noise criterion of 80 dBA L_{eq} at residential land uses, 85 dBA L_{eq} at commercial and office uses, and 90 dBA L_{eq} at industrial land uses.

Stationary Noise

Stationary noise sources are controlled by General Plan non-transportation noise standards, shown in Table 3.13-3, and SCMC Section 9.30 and Section 18.21.050. For non-transportation noise sources that would be analyzed at the project level, pursuant to Section 18.21.050, the exterior noise level limit in residential districts is 55 dB(A) L50 and 70 dBA Lmax during daylight hours and 45 dB(A) L50 and 60 dBA Lmax during nighttime hours. The interior noise level limit in residential districts is 40 dB(A) L50 and 55 dBA Lmax during daylight hours and 30 dB(A) L50 and 45 dBA Lmax during nighttime hours.

Groundborne Vibration

SCMC Section 18.21.060 considers vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) exempt from the City's standard. However, the City does not have established vibration thresholds for construction noise impact analysis. Therefore, Caltrans' vibration thresholds are used (0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, 0.25 to 0.30

in/sec PPV for older buildings (i.e. pre-1945) that are found to be structurally sound but cosmetic damage to plaster ceilings or walls is a major concern, and a conservative limit of 0.08 in/sec PPV for buildings that are documented to be structurally weakened).

3.13.2.2 *Project Impacts*

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

Temporary Construction Noise

No specific development or construction is proposed as part of the Plan. The Plan would be built out over a span of approximately 20 years. As such, construction activities would occur intermittently at different sites within the Plan until full buildout. Noise impacts resulting from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, the distance between construction noise sources and noise-sensitive receptors, any shielding provided by intervening structures or terrain, and ambient noise levels. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), when construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction durations last over extended periods of time.

SCMC Section 9.30.070 exempts construction noise during the hours of eight a.m. to five p.m., Monday through Friday, and nine a.m. to five p.m. on Saturday. No construction noise-related activities on Sundays and the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Juneteenth, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day. This section of the SCMC also states that all gasoline-powered construction equipment shall be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted. The City does not have established quantitative thresholds for the impact of temporary increases in noise due to construction. Therefore, this EIR relies on the FTA construction noise criterion of 80 dBA L_{eq} at residential land uses, 85 dBA L_{eq} at commercial and office uses, and 90 dBA L_{eq} at industrial land uses.

Major noise-generating construction activities associated with development under the Plan would typically include removal of existing structures, site grading and excavation, installation of utilities, the construction of building foundations, cores, and shells, paving, and landscaping. Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. While specific project information is unknown at this time, the construction of building foundations for high-rise buildings may require impact or vibratory pile driving activities to support the structure, which would generate high noise levels. Site grading, excavation activities, the operation of heavy construction equipment, and the arrival/departure of

heavy-duty trucks would also generate high noise levels, as these phases often require the simultaneous use of multiple pieces of heavy equipment such as dozers, excavators, scrapers, and loaders.

Typical hourly average construction generated noise levels are about 81 to 88 dBA L_{eq}, measured at a distance of 50 feet from the center of the site during busy construction periods (e.g., earth moving equipment, impact tools, etc.). Construction-generated noise levels drop off at a rate of about six dBA per doubling of distance between the source and receptor. Shielding by buildings or terrain often result in lower construction noise levels at distant receptors. Lower noise levels result from building construction activities when these activities move indoors, and less heavy equipment is required to complete the tasks.

Impact NOI-1: Future construction associated with development under the Plan could result in temporary construction noise impacts.

General Plan Polices that Reduce Impacts

In accordance with General Plan Policy NOI-1.8, future development projects under the Plan would implement the following noise control strategies and construction BMPs.

- **NOI-1.8:** Construction activities shall comply with the City's noise ordinance. Development projects that require an acoustical study shall incorporate reasonable noise and vibration reduction measures and best management practices to minimize excessive noise levels during all phases of construction activity. Reduction measures and best management practices may include, but are not limited to, noise control techniques for construction tools and equipment, construction site management techniques, temporary noise barriers, noise monitoring and reporting, and/or construction traffic management. Such measures shall include, but not be limited to, the following to reduce construction noise levels as low as practical:

    - Limit construction activity to weekdays between 8:00 a.m. and 5:00 p.m. and weekends between 9:00 a.m. and 5:00 p.m., with no construction on the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Juneteenth, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day;
    - Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;
    - Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
    - Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
    - Locate staging areas and construction material areas as far away as possible from adjacent land uses;

- Prohibit all unnecessary idling of internal combustion engines;
- If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise levels generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced;
- If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected;
- If impact pile driving is proposed, foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. Pre-drilling foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of blows required to seat the pile. Notify all adjacent land uses of the construction schedule in writing;
- Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.

Future development under the Plan would comply with SCMC Section 9.30.070 and General Plan Policy NOI-1.8 and, consistent with the conclusions of the 2045 General Plan Reset EIR, would result in less than significant construction noise impacts by limiting the days and hours allowed for construction activity and requiring the implementation of construction noise control and attenuation measures.

Permanent Operational Noise

Based on General Plan Policy NOI-1.4, a permanent increase in noise levels would be considered substantial if: 1) the noise levels caused the L_{dn} at noise-sensitive uses to increase by three dBA or more and exceed the "normally acceptable" level; 2) the noise levels caused the L_{dn} at noise-sensitive uses to increase by 5 dBA or more and remain "normally acceptable;" or if 3) the noise levels to exceed the limits in Table 3.13-3.

Traffic Noise

For a substantial permanent cumulative traffic noise increase to occur, two qualifications must be met: 1) if the Cumulative (2045) With Plan (Build) traffic volumes result in a noise level increase defined in Action NOI-1.4 of the City's General Plan; and 2) if the Cumulative (2045) With Plan (Build) traffic volumes result in a 1 dBA Ldn or more noise level increase compared to Cumulative (2045) Without Plan (No Build) conditions, which would be considered a cumulatively considerable contribution to the overall traffic noise increase.

Traffic noise increases were calculated for the Cumulative (2045) Without Plan (No Build) scenario and for the Cumulative (2045) With Plan (Build) scenario when compared to existing conditions. Table 3.13-6 below summarizes the existing and projected future noise levels on select roadway segments. Figure 3.13-3 and Figure 3.13-4 show the cumulative noise contours with and without the Plan, respectively.

As shown in Table 3.13-6 below, the following roadway segments in the Plan area would increase by more than three dBA Ldn with the Cumulative (2045) With Plan (Build) scenario, when compared to the existing traffic conditions:

- Old County Road west of Harbor Boulevard;
- Old County Road between Harbor Boulevard and Quarry Road;
- Old County Road between Quarry Road and Taylor Way;
- Old County Road between Taylor Way and Holly Street;
- Old County Road east of Holly Street;
- Industrial Road between Taylor Way and driveway;
- Holly Street south of Old County Road;
- Taylor Way between Industrial Road and Old County Road; and
- Quarry Road between Industrial Road and Old County Road.

Increased traffic on each of these segments result in a future noise level of 60 dBA L_{dn} or greater under the Cumulative (2045) With Plan (Build) conditions. Along Old County Road between Quarry Road and Taylor Way, between Taylor Way and Holly Street, and east of Holly Street, a three dBA L_{dn} increase was also calculated under the Cumulative (2045) Without Plan (No Build) scenario. As shown in Table 3.13-6, the increase attributable solely to the Plan would be zero dBA L_{dn}. Therefore, the permanent noise level increase along these three segments would not result in a cumulatively considerable contribution to the overall traffic noise at receptors along these segments.

Along all other segments listed above, the permanent noise level increases would be one to two dBA L_{dn} higher than the increases calculated for the Cumulative (2045) Without Plan (No Build) scenario. While each of these segments would result in a cumulatively considerable contribution to the overall traffic noise at the existing receptors along these roadways, no existing noise-sensitive receptors (i.e., single- or multi-family residences, schools, hospitals, etc.) are located along Taylor Way, Quarry Road, or Harbor Boulevard. Therefore, consistent with General Plan Policy NOI-1.2, these noise level increases result in a less-than-significant impact.

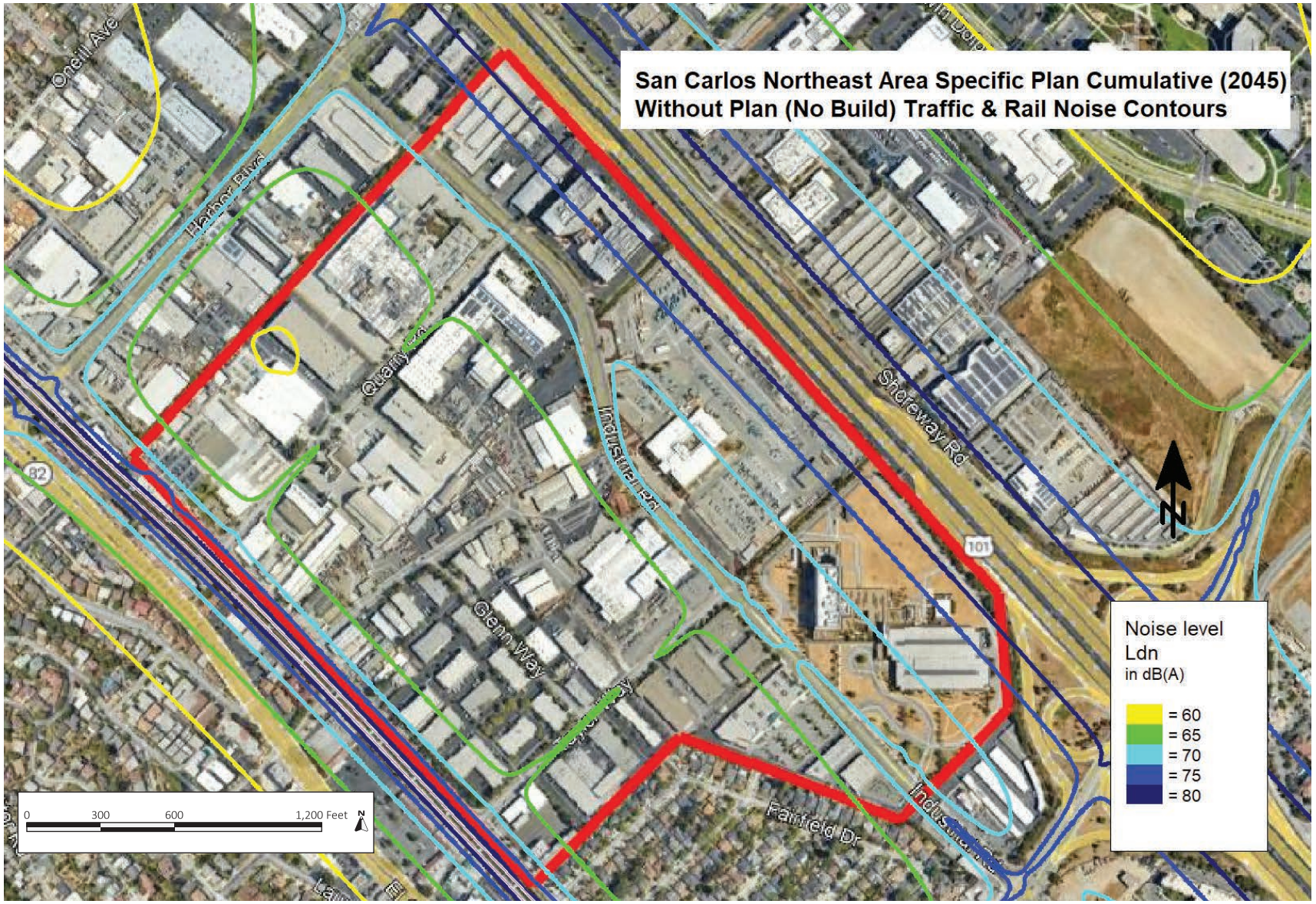
PAMF is located along the Industrial Road segment between Taylor Way and the driveway, and this would be considered a noise-sensitive receptor. However, the existing and future noise

Table 3.13-6: Existing and Future Modeled Noise Levels Along Surrounding Roadways

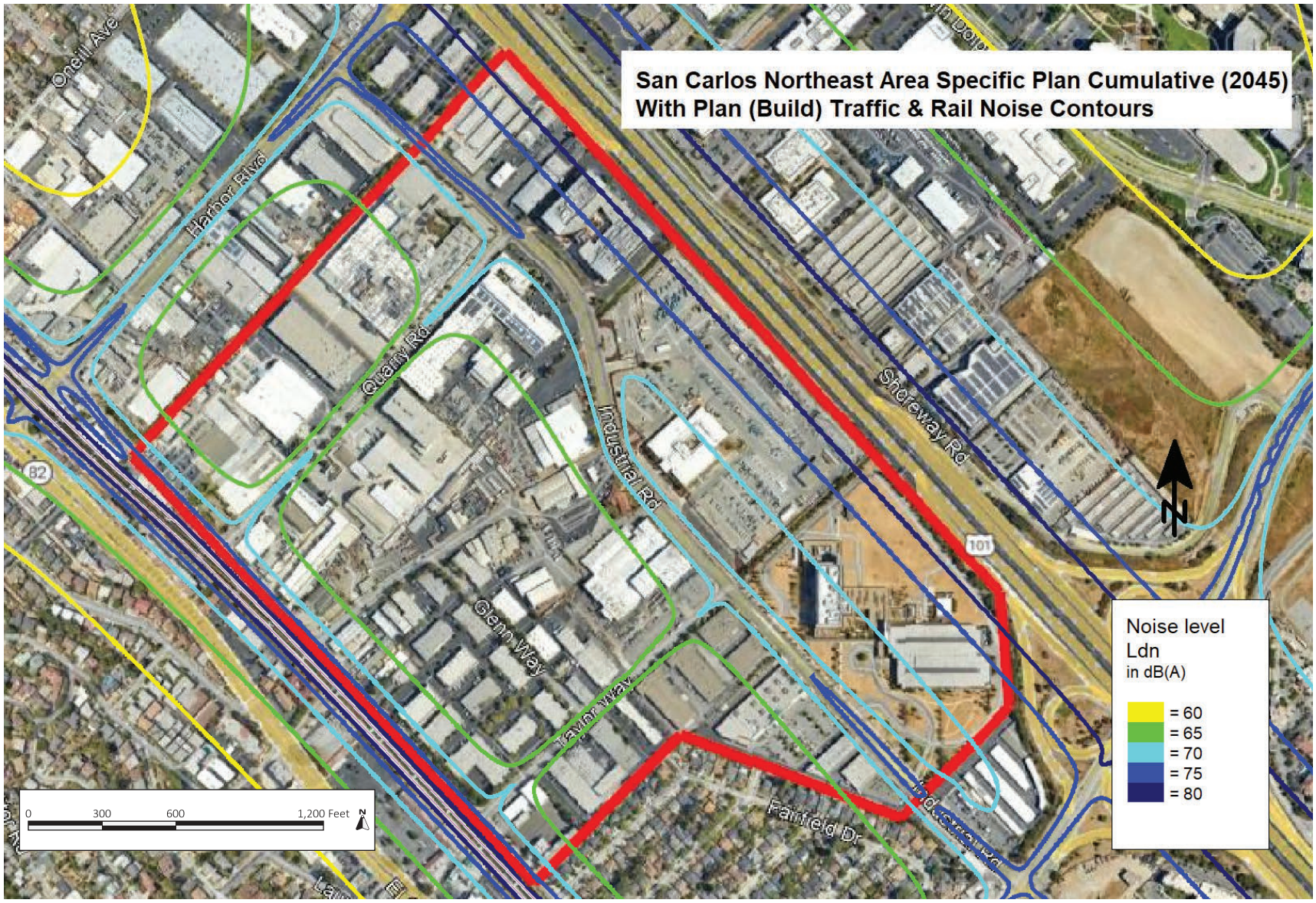
Roadway	Segment	L_{dn} at 75 feet from the Roadway Centerline, dBA				Increase Over Existing, dBA L_{dn}			Increase of Cumulative Build Scenario Over Cumulative No Build Scenarios, dBA
		Existing (2023)	Existing (2023) with Plan (Build)	Cumulative (2045) without Plan (No Build)	Cumulative (2045) with Plan (Build)	Existing (2023) with Plan (Build)	Cumulative (2045) without Plan (No Build)	Cumulative (2045) with Plan (Build)	
Old County Road/ Caltrain tracks	West of Harbor Blvd.	66	67	68	69.1	1	2	**3**	**1**
	Harbor Blvd. to Quarry Rd.	67	68	69	70	1	2	**3**	**1**
	Quarry Rd. to Taylor Way	68	69	71	71	1	**3**	**3**	0
	Taylor Way to Holly St.	68	69	71	71	1	**3**	**3**	0
	East of Holly St.	67	68	70	70	1	**3**	**3**	0
Industrial Road	Harbor Blvd. to Quarry Rd.	69	70	70	71	1	1	2	1
	Quarry Rd. to Taylor Way	68	69	70	70	1	2	2	0
	Taylor Way to driveway	68	70	70	71	2	2	**3**	**1**
	Driveway to Holly St.	68	69	69	70	1	1	2	1
	East of Holly St.	69	69	71	71	0	2	2	0
Holly Street	North of US 101	67	68	68	68	1	1	1	0
	Industrial Rd. to Old County Rd.	65	66	67	67	1	1	2	1

Roadway	Segment	L_{dn} at 75 feet from the Roadway Centerline, dBA				Increase Over Existing, dBA L_{dn}			
		Existing (2023)	Existing (2023) with Plan (Build)	Cumulative (2045) without Plan (No Build)	Cumulative (2045) with Plan (Build)	Existing (2023) with Plan (Build)	Cumulative (2045) without Plan (No Build)	Cumulative (2045) with Plan (Build)	Increase of Cumulative Build Scenario Over Cumulative No Build Scenarios, dBA
	South of Old County Rd.	66	67	68	69	1	2	**3**	**1**
Taylor Way	Industrial Rd. to Old County Rd.	60	62	62	63	2	2	**3**	**1**
Quarry Road	Industrial Rd. to Old County Rd.	61	63	62	64	2	1	**3**	**2**
Harbor Boulevard	North of Industrial Rd.	71	72	73	74	1	2	**3**	**1**
	Industrial Rd. to Old County Rd.	66	68	67	68	2	1	2	1
US 101	North of Holly Street	82	82	84	84	1	2	2	0

Source: Illingworth & Rodkin. Northeast Area Specific Plan Noise and Vibration Assessment. February 2025.



NOISE CONTOURS FOR THE CUMULATIVE (2045) WITHOUT PLAN (NO BUILD) TRAFFIC SCENARIO | FIGURE 3.13-3



NOISE CONTOURS FOR THE CUMULATIVE (2045) WITH PLAN (BUILD) TRAFFIC SCENARIO | FIGURE 3.13-4

environment at the medical facility would be dominated by U.S. 101, which is significantly louder than Industrial Road. Therefore, the traffic noise increase along Industrial Road from the project would not be noticeable at PAMF compared to the noise level experienced by the adjoining U.S. 101.

Additionally, a newly constructed residential building (Artisan Crossing completed in 2023) is located along Old County Road, west of Harbor Boulevard, and would be considered a sensitive receptor exposed to a potentially significant permanent noise level increase; however, new residential buildings are designed to meet the normally acceptable environmental noise conditions under future conditions, typically 20 years or more in the future. The Artisan Crossing building would include adequate noise attenuating features to reduce future exterior noise levels at common outdoor use areas to meet the City thresholds, as well as adequate STC-rated wall assemblies to ensure residential interiors are at or below 45 dBA L_{dn} under future conditions. These design features included in the Artisan Crossing apartment building are typically recommended mitigation measures to reduce a significant permanent noise level increase to a less-than-significant level.

Consistent with General Plan Policy NOI-1.9, future development projects implementing the Plan would minimize potential transportation-related noise through the use of setbacks, street circulation design, coordination of routing and other traffic control measures and the construction of noise barriers and consider use of “quiet” pavement surfaces when resurfacing roadways.

Operational Noise

Future development under the Plan is anticipated to require various mechanical equipment for heating, ventilation, and cooling purposes, exhaust fans, emergency generators, and other similar equipment that could produce noise levels exceeding the maximum noise limits when located near existing or proposed residential land uses. Additionally, potential noise-generating sources, such as truck deliveries or other project-specific operational noise sources, may also be proposed at the project-level. Given that the Plan does not propose or approve any specific development, noise generated by future mechanical equipment at the property plane of existing residential, commercial, and industrial land uses cannot be quantified at this time, since it is dependent on the distance between the noise source and receptor, attenuation provided by project design, and other project-specific factors. Stationary noise sources are controlled by General Plan non-transportation noise standards, shown in Table 3.13-3, and SCMC Section 9.30 and Section 18.21.050.

With adherence to SCMC requirements and General Plan goals, policies, and actions, stationary noise impacts associated with future development and activities under the Plan would be evaluated and mitigated as needed to meet General Plan and SCMC requirements as individual development projects undergo project-level environmental review, and are considered less than significant.

Summary of Project-Generated Noise

The City of San Carlos General Plan and SCMC provides policies and thresholds to reduce operational and transportation noise at sensitive receptors. Chapter 18.21.050 of the SCMC regulates all operational noise and noise attenuation measures, including site planning and project design measures, to be incorporated into future projects to reduce noise levels to meet the above thresholds and interior levels of 45 dBA. Noise barriers shall be considered and may be required only after all feasible design-related noise measures have been incorporated into future projects.

Impact NOI-2: Future development under the Plan could result in interior noise levels in excess of 45 dBA.

General Plan Policies that Reduce Operational Noise Impacts

- **NOI-1.6 and NOI-1.10:** New developments within the Plan Area shall be required to comply with City noise standards set forth in the General Plan and SCMC. To ensure compliance with the operational noise level thresholds required in the General Plan and SCMC, a qualified acoustical consultant shall be retained to review mechanical equipment systems during final design of the proposed project consistent with standards City practice. The consultant shall review selected equipment and determine specific noise reduction measures necessary to reduce noise to comply with the City's noise level requirements. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Additionally, enclosures and interior wall treatments shall be considered to reduce noise exposure within the on-site units. Alternate measures may include locating equipment in less noise-sensitive areas, where feasible.

The incorporation of the measures recommended by the acoustical consultant to ensure compliance with the City's requirements would reduce the impact to future development projects to a less-than-significant level. Since the Artisan Crossing building already includes these measures as part of the building design, the permanent noise level increase would be considered a less-than-significant impact at this new sensitive receptor.

Future development, in compliance with the above General Plan policies and the SCMC, would not result in a temporary or permanent increase in ambient noise levels in the vicinity of the Plan in excess of standards established in the General Plan and noise ordinance, or applicable standards of other agencies. **(Less than Significant Impact)**

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

The Plan does not include new permanent sources of vibration. The following discussion pertains to construction vibration.

Caltrans recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, which typically consist of buildings constructed since the 1990s. Conservative vibration limits of 0.25 to 0.3 in/sec PPV have been used for buildings that are found to be structurally sound but where structural damage is a major concern. For historical buildings or buildings that are documented to be structurally weakened, a cautious limit of 0.08 in/sec PPV is often used to provide the highest level of protection. No historical buildings or buildings that are documented to be structurally weakened are adjacent to Plan area. For the purposes of this analysis, groundborne vibration levels exceeding the conservative 0.3 in/sec PPV limit for conventional buildings would have the potential to result in a significant vibration impact.

The Plan would be built out over the span of approximately 20 years. As such, future construction activities and associated groundborne vibration, would occur intermittently at different sites within the Plan area until full buildout. The construction of future development projects may generate vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Construction activities could include grading, foundation work, paving, and new building framing and finishing. Detailed information regarding construction equipment and phasing for future projects implementing the Plan are not available at this time. Therefore, this analysis cannot assume that impact or vibratory pile driving activities, which can cause excessive vibration, would not be required.

Future project construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Jackhammers typically generate vibration levels of 0.035 in/sec PPV, and drilling typically generates vibration levels of 0.09 in/sec PPV at a distance of 25 feet. Vibration levels would vary depending on soil conditions, construction methods, and equipment used. Table 3.13-7 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet, as well as distances to the 0.08 in/sec and 0.3 in/sec PPV thresholds.

Table 3.13-7: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 ft. (in/sec)	Minimum Distance to Meet 0.08 in/sec PPV (feet)	Minimum Distance to Meet 0.3 in/sec PPV (feet)
Pile Driver (Impact)	upper range	1.158	271	86
	typical	0.644	160	51

Equipment		PPV at 25 ft. (in/sec)	Minimum Distance to Meet 0.08 in/sec PPV (feet)	Minimum Distance to Meet 0.3 in/sec PPV (feet)
Pile Driver (Sonic)	upper range	0.734	180	57
	typical	0.170	48	15
Clam shovel drop		0.202	56	18
Hydromill (slurry wall)	in soil	0.008	3	1
	in rock	0.017	6	2
Vibratory Roller		0.210	58	19
Hoe Ram		0.089	27	9
Large bulldozer		0.089	27	9
Caisson drilling		0.089	27	9
Loaded trucks		0.076	23	8
Jackhammer		0.035	12	4
Small bulldozer		0.003	2	<1

Source: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018, modified by Illingworth & Rodkin, Inc. January 2025.

Pile driving has the potential of generating the highest ground vibration levels and is of primary concern to architectural damage, particularly when it occurs within 100 to 200 feet of structures. Vibration levels generated by pile driving activities would vary depending on project conditions, such as soil conditions, construction methods, and equipment used, but could exceed the recommended PPV thresholds to avoid architectural damage. Other project construction activities, such as caisson drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may also potentially generate substantial vibration in the immediate vicinity.

Depending on the proximity of existing structures to each construction site, the structural soundness of the existing buildings, and the methods of construction used, vibration levels may be high enough to damage existing structures. As with any type of construction, vibration levels may at times be perceptible. However, construction phases that have the highest potential of producing vibration (pile driving and use of jackhammers and other high-power tools) would be intermittent and would only occur for short periods of time for any individual project site. By use of administrative controls, such as notifying neighbors of scheduled construction activities and scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby businesses, perceptible vibration can be kept to a minimum and as such would not result in a significant impact with respect to perception.

Vibration sources are controlled by SCMC Section 9.30.070, limiting construction to daytime hours, and Section 18.21.060, temporary construction vibration exemption.

Impact NOI-2: Future construction associated with development under the Plan could result in damage to existing buildings from temporary construction vibration.

To further reduce construction vibration, the Plan would require that the following measures are implemented by future development projects proposing construction equipment within the screening distances of vibration-sensitive receptors (refer to Table 3.13-7), to reduce construction-related vibration.

Vibration Control Project Requirements:

- A construction vibration control plan shall be prepared by a qualified professional in accordance with industry-accepted methodology. The plan shall identify necessary construction vibration controls to reduce the potential of cosmetic damage to buildings and to minimize annoyance. Controls may include, but would not be limited to, the following measures:
    - A list of all heavy construction equipment to be used for the project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.
    - Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
    - Use smaller equipment along project boundaries to minimize vibration levels below the limits.
    - Avoid using vibratory rollers and tampers near sensitive areas.
    - Select demolition methods not involving impact tools.
    - Modify/design or identify alternative construction methods to reduce vibration levels below the limits.
    - Avoid dropping heavy objects or materials near sensitive uses.
    - For projects requiring impact or vibratory pile driving, develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits. Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

Implementation of the above Plan-specific vibration control measures would reduce construction vibration generated by future development projects to a less than significant level. **(Less than Significant Impact)**

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

Aircraft noise exposures are controlled by General Plan Policies NOI-1.11 through NOI-1.13, SCMC Sections 18.21.050-F and 18.21.150-C, and compliance with land use compatibility standards of the San Carlos ALUCP would require a noise analysis if residential uses are located within the 55 dBA CNEL/Ldn airport noise contour and ensure appropriate mitigation measures are included at proposed noise sensitive uses. As discussed in Section 3.13.1.3, the entire Plan Area lies outside the 65 dBA CNEL/L_{dn} noise contour. As shown on Figure 3.13-2, the eastern corner of the Plan Area lies partially within the 60 dBA CNEL/L_{dn} noise contour. The project proposes mixed-use residential in the southeast portion of the Plan. While the 2035 Noise Contours for the San Carlos Airport (shown in Figure 3.13-2) do not include the 55 dBA CNEL contour line, future residential uses in the Plan area could potentially fall within the 55 dBA CNEL of the San Carlos Airport.

Impact NOI-3: Future residential uses under the Plan could potentially fall within the 55 dBA CNEL of the San Carlos Airport.

General Plan Policies that Reduce Project Impacts

In accordance with General Plan Policies NOI-1.11 and NOI-1.13, future residential development within the 55 dBA CNEL would implement mitigation measures to reduce noise impacts from aircraft operations.

- **NOI-1.11:** Ensure that proposed noise sensitive land uses include appropriate mitigation to reduce noise impacts from aircraft operations at San Carlos Airport. Work with the San Carlos Airport Pilots Association and San Mateo County to continue to refine and implement the Airport's noise abatement procedures.
- **NOI-1.13:** Require a noise analysis for new residential uses located within the 55 CNEL impact area of the San Carlos Airport. If recommended in the report, mitigation measures shall be required as conditions of project approval.

The 2045 General Plan Reset EIR found that adherence to General Plan Policies NOI-1.11 and NOI-1.13, SCMC Sections 18.21.050-F and 18.21.150-C, and compliance with land use compatibility standards of the San Carlos ALUCP, would ensure aircraft noise impacts associated with implementation of the Plan are considered less than significant. **(Less than Significant Impact)**

3.13.2.3 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant noise impact?

The geographic area for cumulative noise impacts is the Plan area and adjacent parcels and roadways, where build out of future development could contribute traffic or noise at a perceptible level.

Temporary and Permanent Increases in Ambient Noise Levels

As discussed under checklist question a), the Plan does not propose any specific development or construction and, therefore temporary and permanent increases in ambient noise levels associated with specific development proposals cannot be quantified. Future cumulative projects would, however, be required to implement construction noise control strategies and construction best management practices pursuant to General Plan Policy NOI-1.8 and limit construction hours to those specified in SCMC Section 9.30.070. Further, future cumulative development would be required to comply with City noise standards set forth in the General Plan and SCMC, including General Plan Policy NOI-1.6 and 1.10, which requires a qualified acoustical consultant shall be retained to review mechanical equipment systems during final design of the proposed project consistent with standards City practice. Therefore, implementation of the proposed Plan would not result in a cumulatively considerable contribution to a significant cumulative noise impact.
As discussed under checklist question a), the Plan would not result in a significant cumulative permanent noise level increase on roadway segments when compared to existing conditions.

Groundborne Vibration

Future development projects under the Plan would be required to comply with the SCMC and would implement vibration control measures, as outlined above under checklist question c). Consistent with the findings of the 2045 General Plan Reset EIR, adherence to SCMC Section.30.070 and Section 18.21.060 would ensure that the Plan would not result in a cumulatively considerable groundborne vibration or noise impact.

Airport Noise

In accordance with General Plan Policies NOI-1.11 and NOI-1.13, future cumulative residential development within the 55 dBA CNEL would implement mitigation measures to reduce noise impacts from aircraft operations. Therefore, the project would not contribute to a cumulatively considerable contribution to a significant cumulative aircraft noise impact to people working and residing near San Carlos Airport.

As discussed above, buildout of the Plan would have a less than significant cumulative noise impact. **(Less than Significant Cumulative Impact)**

3.13.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. Bay Area Air District)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of San Carlos has General Plan policies (NOI-1.1, NOI-1.4, NOI-1.5, and NOI-1.13) that address existing noise conditions affecting a proposed project or plan area.

3.13.3.1 *Future Exterior and Interior Noise Environment*

Exterior Noise

Noise produced by vehicular traffic along roadways and trains in the vicinity of Plan Area could potentially expose the proposed land uses to levels exceeding the exterior compatibility thresholds. Future exterior noise levels at a distance of 75 feet from the centerline of the primary roadways within the Plan Area would typically range from 63 dBA L_{dn} along Taylor Way between Industrial Road and Old County Road to 76 dBA L_{dn} along Harbor Boulevard, south of Old County Road. Future exterior noise levels within 75 feet of the nearest through lane of U.S. 101 would be 84 dBA L_{dn}.

Interior Noise

Residential

Standard residential construction provides approximately 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation. Where exterior noise levels range from 60 to 65 dBA L_{dn}, the inclusion of adequate forced-air mechanical ventilation is often the method selected to reduce interior noise levels to acceptable levels by closing the windows to control noise. Where noise levels exceed 65 dBA L_{dn}, forced-air mechanical ventilation systems and sound-rated construction methods are normally required. Such methods or materials may include a combination of smaller window and door sizes as a percentage of the total building façade facing the noise source, sound-rated windows and doors, sound-rated exterior wall assemblies, and mechanical ventilation so windows may be kept closed at the occupant's discretion.

Commercial, Office, and Industrial Uses

Standard construction materials for commercial, office, and industrial uses would provide about 25 dBA of noise reduction in interior spaces. The inclusion of adequate forced-air mechanical ventilation systems is normally required so that windows may be kept closed at the occupant's discretion and would provide an additional 5 dBA reduction. The standard construction materials in combination with forced-air mechanical ventilation would satisfy the daytime threshold of 50 dBA $L_{eq(1\text{-}hr)}$ at most commercial, office, and industrial uses.

Spaces where lower noise levels would be desired, such as private offices and conference rooms, may benefit from additional noise control in order to meet a lower, more desirable interior noise

level. Additional noise control could be accomplished by selecting higher sound-rated windows (STC 34 or greater along exterior façades).

Incorporation of General Policies NOI-1.4 and NOI-1.13 require noise studies for all projects where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 dBA L_{dn} or greater or are located within the 55 dBA CNEL/L_{dn} impact area of the San Carlos Airport. The policies state the following:

- **Policy NOI-1.4.** Require a detailed acoustic report in all cases where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 L_{dn} or greater. If recommended in the report, mitigation measures shall be required as conditions of project approval.

- **Policy NOI-1.13.** Require a noise analysis for new residential uses located within the 55 CNEL/L_{dn} impact area of the San Carlos Airport. If recommended in the report, mitigation measures shall be required as conditions of project approval.

When project-level development information, such as site plans, building elevations, floor plans, and the position of buildings and outdoor use areas within the Plan Area are known, site-specific project-level noise studies would be conducted to confirm the recommendations for exterior and interior noise reduction methods for both residential and nonresidential uses. An acoustical study shall be conducted when an application is received for a development project that could be exposed to noise greater than that deemed acceptable by the maximum noise levels specified by the City. The study shall determine compliance with the noise and land use compatibility standards, identify potential noise impacts, and propose site-specific measures to reduce exposure to exterior and interior noise levels that exceed maximum permissible levels.

A project-specific acoustical analysis shall be prepared, in compliance with State Building Codes and City noise standards, to ensure that the design incorporates controls to reduce interior noise levels specified in Policy NOI-1.5. The policy states the following:

- **Policy NOI-1.5.** New development of noise-sensitive land uses proposed in noise-impacted areas shall incorporate effective mitigation measures into the project design to reduce exterior and interior noise levels to the following acceptable levels.
    a. For new single-family residential development, maintain a standard of 60 L_{dn} (day/night average noise level) for exterior noise in private use areas.
    b. For new multi-family residential development maintain a standard of 65 L_{dn} in community outdoor recreation areas. Noise standards are not applied to private decks and balconies and shall be considered on a case-by-case basis in the downtown core.
    c. Interior noise levels shall not exceed 45 L_{dn} in all new residential units (single- and multi-family). Development sites exposed to noise levels exceeding 60 L_{dn} shall be analyzed following protocols in Appendix Chapter 12, Section 1208, A, Sound Transmission Control, 2001 Building Code Chapter 12, Appendix 1207.11.2 of the 2007 California Building Coe (or the latest version).

d. Where new residential units (single- and multi-family) would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels inside homes shall not exceed 50 dBA in bedrooms or 55 dBA in other occupied spaces. These single event limits are only applicable where there are normally four or more train operations per day.

3.13.3.2 *Future Vibration Environment*

The Plan could facilitate the construction of new buildings in the vicinity of the existing Caltrain tracks. Old County Road borders the Plan Area to the west, and the Caltrain tracks run parallel to Old County Road just outside the Plan Area boundary. The centerline of the nearest tracks would be approximately 60 to 135 feet from the Plan Area's western boundary.

Assuming existing rail activity plus additional California High Speed Rail activity under future buildout conditions, more than 70 trains would pass through San Carlos in a 24-hour period. Therefore, the vibration level thresholds for train pass-bys would be 65 VdB for buildings where vibration would interfere with sensitive interior operations (e.g., research labs), 72 VdB for residential buildings, and 75 VdB for commercial, office, and institutional buildings.

While vibration measurements were not made within the Plan Area, vibration levels due to train pass-bys were measured for a nearby project.[94] At 90 to 100 feet, vibration levels were measured to be 65 to 71 VdB in this previous study. Using these source levels, minimum setback distances for residential and nonresidential buildings along the western boundary of the Plan Area are summarized in Table 3.13-8 below.

Table 3.13-8: Minimum Distances to the Nearest Tracks to meet Vibration Thresholds for Proposed Buildings within the Plan Area

Roadway Segment	Distance from Edge of Nearest Tracks, feet		
	Buildings with Sensitive Interiors (65 VdB)	Residences (72 VdB)	Nonresidential (75 VdB)
Old County Road	335	75	40

Source: Illingworth & Rodkin. Northeast Area Specific Plan Noise and Vibration Assessment. February 2025.

Vibration Control Measure Project Requirement:

- Based on the setback distances presented in Table 3.13-8, project-specific vibration analyses shall be prepared for residential buildings proposed along Old County Road within 75 feet of the nearest Caltrain track and for buildings with interiors sensitive to vibration that are within 335 feet of the nearest Caltrain track. These studies should include vibration

[94] Illingworth & Rodkin, Inc. *789 Old County Road Noise Assessment*. June 21, 2024.

measurements at the project sites and comparisons of the measurements to the established FTA standards in order to verify vibration and land use compatibility consistent with General Policies NOI-1.7 and NOI-1.14.

3.14 Population and Housing

3.14.1 Environmental Setting

3.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[95] The City of San Carlos Housing Element and related land use policies were last updated in January 2023 for the 2023-2031 housing cycle.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified PDAs. PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[96]

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

[95] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed September 12, 2024. http://hcd.ca.gov/community-development/housing-element/index.shtml.

[96] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating population and housing impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.2	Encourage development of higher density housing and support additional job growth within the TOD corridor while being sensitive to surrounding uses.
LU-5.6	Strive for a balanced ratio of jobs and housing units.
LU-5.11	Continue to require developers to pay their fair share of the capital cost of public facilities through appropriate development impact and utility connection fees.

San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to population and housing as follows:

- Title 18, Zoning Code, divides the city into distinct zones in order to implement the land use and development policies in the General Plan. Among the primary objectives of the Zoning Code are the regulation of building form, placement, density, and the provision of sufficient parking and open spaces in conjunction with development.

- Chapter 18.04, Residential Districts, serves to preserve, protect, and enhance the character of the City's different residential neighborhoods. It also promotes residential development that is compatible with environmental constraints and neighborhood characteristics.

- Chapter 18.05, Mixed-Use Districts, serves to provide for the orderly, well planned, and balanced development of mixed-use districts
- Chapter 18.16, Affordable Housing programs, the purpose of this chapter is to Encourage the development and availability of housing affordable to a broad range of households with varying income levels within the City as mandated by State law, California Government Code Section 65580 et seq. This chapter establishes below market rate housing requirements and provides exemptions.

3.14.1.2 *Existing Conditions*

As of 2024, San Carlos had a population of 29,648, with an average persons per household of 2.47.[97, 98]ABAG estimates that San Carlos will have a population of 35,250 by 2040.[99]

The Plan area is currently developed with approximately 2,617,497 square feet of light industrial, office, and institutional uses. There are currently no residential uses within the Plan. Under existing conditions, the Plan supports approximately 6,933 workers.

3.14.2 Impact Discussion

For the purpose of determining the significance of the project's impact on population and housing, would the project:

1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

3.14.2.1 *Project Impacts*

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

Implementation of the Plan would result in an overall intensification of development within the Plan area and would introduce new employment and residential uses over an approximately 20-year period but does not include specific development proposals.

The Plan Area currently has no housing units and therefore, zero residential population. The Plan Area currently supports 2,617,497 square feet of light industrial, office, and institutional uses, which equates to approximately 6,933 jobs.[100,101] As described in Section 2.3 of this EIR, the Plan would allow for a net increase of 1,890 residential units and 4,508,000 square feet of non-residential uses. The 4,508,000 square feet of new employment square footage would result in approximately 9,794

[97] State of California. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2024*. May 2024. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/
[98] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.
[99] City of San Carlos. City of San Carlos *Focused General Plan Update Draft Environmental Impact Report (SCH# 2021120442).* October 2022.
[100] Strategic Economics. *DRAFT: Public Services Cost Assessment.* October 15, 2024.
[101] Assumes 1 job per 366 square feet of R&D; 1 job per 247 square feet of office; 1 job per 1,049 square feet of industrial, and 1 job per 300 square feet of hospital.

net new jobs and the 1,890 residential units would result in approximately 3,611[102] new residents. Table 3.14-1 below provides a summary of the number of residents, employment square footage, and jobs/employees estimated under existing conditions and the proposed Plan.

Table 3.14-1: Estimated Residents and Employes Under Existing Conditions and Proposed Plan

	Residents	Employment Square Footage	Jobs/Employees
Existing Conditions	0	2,617,497	6,933
Plan	3,611	6,707,497	16,727[1]
Net Change	3,611	4,508,000	9,794

Source: Strategic Economics. *DRAFT: Public Services Cost Assessment.* October 15, 2024.

Notes:

[1] Under the Plan, 418,000 square feet of non-residential uses would be removed. This equates to 562 fewer jobs ([6,933-562] + 10,356).

The associated growth resulting from buildout of the Plan was analyzed in the buildout projections for the 2045 General Plan Reset. The 2045 General Plan Reset EIR concluded that buildout under the General Plan would not introduce a substantial amount of unplanned population. Both the 2045 General Plan Reset EIR and this EIR for the Plan have been prepared for the purpose of evaluating growth in the Plan area.

The Plan includes infrastructure improvements, including a new multi-modal street network (see Figure 2.4-5) and planned utility improvements (refer to Section 2.3.4). These infrastructure improvements would serve the existing and future development that would occur under the proposed Plan. The Plan does not include extension of roads or other infrastructure that would serve additional growth beyond what is proposed by the Plan. For these reasons, the proposed Plan would not indirectly result in unplanned population growth in an area. **(Less than Significant Impact)**

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As described in Section 3.14.1.2, the Plan currently has no residential units. For this reason, implementation of the proposed Plan would not displace substantial numbers of existing people or housing, necessitate the construction of replacement housing elsewhere. **(No Impact)**

[102] Assumes 1.99 persons per household. Source: Strategic Economics. *DRAFT: Public Services Cost Assessment*. October 15, 2024.

3.14.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant population and housing impact?

The geographic area for cumulative population and housing impacts is the City boundaries. The 2045 General Plan Reset EIR concluded that buildout under the General Plan Reset would not induce a substantial amount of unplanned population growth or growth for which inadequate planning has occurred, or displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The 2045 General Plan Reset would accommodate the proposed new increase in growth in the City (including the proposed Plan). Therefore, the proposed project would not result in a cumulatively considerable impact to population and housing. **(Less than Significant Cumulative Impact)**

3.15 Public Services

3.15.1 Environmental Setting

3.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC is the official fire code for the State of California (State) and all political subdivisions. It is found in CCR Title 24, Part 9, and, like the CBC, it is revised and published every three years by the California Building Standards Commission. Also like the CBC, the CFC is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions. Typical fire safety requirements include the installation of sprinklers in most new buildings, including all high-rise buildings, all residential buildings, and other facilities; fire resistant rated construction; construction in designated wildland fire hazard severity zones; fire alarm systems and exiting requirements; fire safety requirements during construction; the regulation of hazardous materials not covered by the unified program; and

the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Regional and Local

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating public service impacts resulting from planned development within the City including the following:

Policy	Description
CSS-7.1	Provide efficient and timely processing of development review and building permit applications, while maintaining quality standards in accordance with City Ordinances. Look for solutions to problems, be responsive to community concerns, promote positive
CSS-7.8	Approve rezoning and development permits only when adequate services are available, or when a program to provide services has been approved by the applicable district and the City.
CSS-7.9	Ensure that adequate public services and facilities are planned and constructed to accommodate the population of the city.
CSS-8.3	Ensure that all residents have access to library services including access to computers and other technology.
CSS-8.4	Evaluate through the California Environmental Quality Act (CEQA) process how new development impacts schools, as the quality of San Carlos schools is a primary asset of the city.
LU-5.11	Continue to require developers to pay their fair share of the capital cost of public facilities through appropriate development impact and utility connection fees.
LU-9.16	Require a contribution of parkland and/or fees in-lieu of land dedication as a condition of approval of all new residential subdivisions.

San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to land use and planning as follows:

- Chapter 15.04.040, California Building Code, adopts the 2022 CBC with amendments and is referred to as the City of San Carlos Building Code.
- Chapter 15.04.110, California Fire Code, adopts the 2021 International Fire Code and the 2022 California Fire Code with amendments, referred to as the San Carlos Fire Ordinance.
- Chapter 3.34, Park Facility Development Fee, as known as the Park Facility Development Fee Law of the City of San Carlos, applies to new residential development buildings in San Carlos. The Park Facility Development fee for Fiscal Year 2024-25 is $2,709 per bedroom.

- Section 17.32.030, Park and recreation land dedications or in-lieu fees, states that where a park or recreational facility has been designated in the General Plan, and the park or facility is to be located in whole or in part within a proposed subdivision to serve the immediate and future needs of the residents of the subdivision, the subdivider shall be required to dedicate land for park and recreational facilities sufficient in size to serve the residents of the subdivision area. Additionally, if there are no park or recreation facilities designation but the subdivision is within a one-half- mile radius of a neighborhood park or recreational facility the subdivider shall be required to pay a cash payment in lieu of the land equal to the value of the land.

Fire Inspection Fees

Fire Inspection Fees are generated by the Redwood City/San Carlos Fire Department on an annual basis and are $292 for Fiscal Year 2024-25.[103] The primary goal for the Annual Fire and Life Safety Inspection Program is to reduce the number of deaths, injuries and property losses from fire.

Parks, Open Space, Buildings and other Recreational Facilities Master Plan 2009-2029

The purpose of the Parks Master Plan is to provide the City with a long-term vision for its park system. The Parks Master Plan addresses the City's park service standards, including park acres per capita, walking distance to park facilities, ideas for new parks, and improvements to existing parks. The Parks Master Plan assumes a population of 34,264 in 2030, which is approximately 3,435 more people than the existing conditions of San Carlos in 2024. The City is currently in the process of updating the Parks Master Plan. The following service standards are discussed in the Parks Master Plan:

- Parks Provision Standard: Provide 2.5 acres of developed/active parks for every 1,000 residents in San Carlos.
- Trails Provision Standard: Provide one-mile of hiking trail per 1,000 residents.
- Walkability Policy: Locate a park or recreational facility within ¼- to ½-mile of every resident.

Trails Connections Plan

The San Carlos Trails Committee completed a Trails Connections Plan that was adopted by City Council in February 2007. The Trail Connections Plan identified and prioritized 14 possible connections to our local trail system as well as neighboring regional open space parks and trails, including Pulgas Ridge, and trails within the City of Belmont and the County of San Mateo.

San Carlos Hillside Trails Plan

Adopted in 2012, the San Carlos Hillside Trails Plan identifies 1.62 miles of new trails within Big Canyon Park, Eaton Park, and Devonshire Canyon. The Hillside Trails Plan also provides design guidelines and construction protocols, in addition to a parking program for the identified trails.

[103] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.

3.15.1.2 *Existing Conditions*

Fire Protection Services

Fire protection services in San Carlos are provided under contract with the RC-SCFD, which provides fire protection, hazardous materials response, disaster preparedness, and emergency medical response. The RC-SCFD has two fire stations in San Carlos: Station 13 and Station 16. Station 13 is staffed with a captain, a firefighter, and a firefighter/paramedic and houses Engine 13, Reserve Engine 113, and Reserve Battalion 103. Station 16 was recently replaced with a new station.[104] According to the Standards of Cover Study and Community Risk Assessment for the Redwood City Fire Department, the RC-SCFD is currently challenged in three ways: response times, rising rate of medical incidents, and limitations associated with having a single ladder truck and Battalion Chief. Out of five response components, which include call processing/dispatch, crew turnout, first-unit travel, first unit call to arrive, and Effective Response Force (ERF) call to arrive, the RC-SCFD exceeds the response time best practice in all but one area—call processing/dispatch. Additionally, the RC-SCFD is challenged by the rising demand for low-acuity EMS responses for patients that seldom need immediate emergency room care and reduce the available capacity for serious, life threatening fires and EMS events. Lastly, due to the RC-SCFD only having one ladder truck and Battalion Chief / Incident Commander, response times are affected. To improve this, the Standards of Cover Study and Community Risk Assessment for the Redwood City Fire Department recommends that a second ladder truck and Battalion Chief / Incident Commander be added at Station 13 in San Carlos.[105]

Police Protection Services

The San Mateo County Sheriff's Office (SMCSO) has been contracted to provide law enforcement services to the City of San Carlos since October 2010. Within the San Mateo County Sheriff's Office, the San Carlos Police Bureau assists with activities in San Carlos and is located at 600 Elm Street. Within the San Mateo County Sheriff's Office there are 800 employees and 98,778 calls for service in 2023.

The national average for the standard ratio of officers per 1,000 residents is 2.4 sworn police officers per 1,000 residents. The department is currently falling short of meeting this national standard.[106]

The national standard for meeting priority 1 calls is 5 minutes or less. The police department is currently meeting this response time standard; the average response time in 2023 was 4 minutes 23 seconds.[107]

[104] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.
[105] Ibid.
[106] Ibid.
[107] Ibid.

The SMCSO has indicated that existing stations are adequate and there are no existing plans for expansion or relocation.[108]

Schools

The project area is served by the Belmont-Redwood Shores Elementary School District (BRSSD) and San Carlos School District (SCSD), as shown on Figure 3.15-1. Sequoia Union High School District (SUHSD) serves all public high school students in the Plan area. As noted previously, there are no residences currently located within the Plan area, and therefore the Plan area does not contribute students to area schools.

San Carlos School District

The current enrollment of SCSD is 2,875 students, which is 177 more students than the 2,698 projected in the most recent Enrollment Projection Consultants Demographic Report from February 2023.[109] SCSD is at capacity for grade-levels TK through 5. In fall of 2025, TK will be planned to move to a 10:1 ratio which is anticipated to bring in an additional 50 to 100 students in the grade level, exceeding capacity. In preparation for this, the TK classroom space has expanded by installing three modular classrooms in Arundel, Brittan Acres, and Heather Elementary Schools during the summer of 2024.

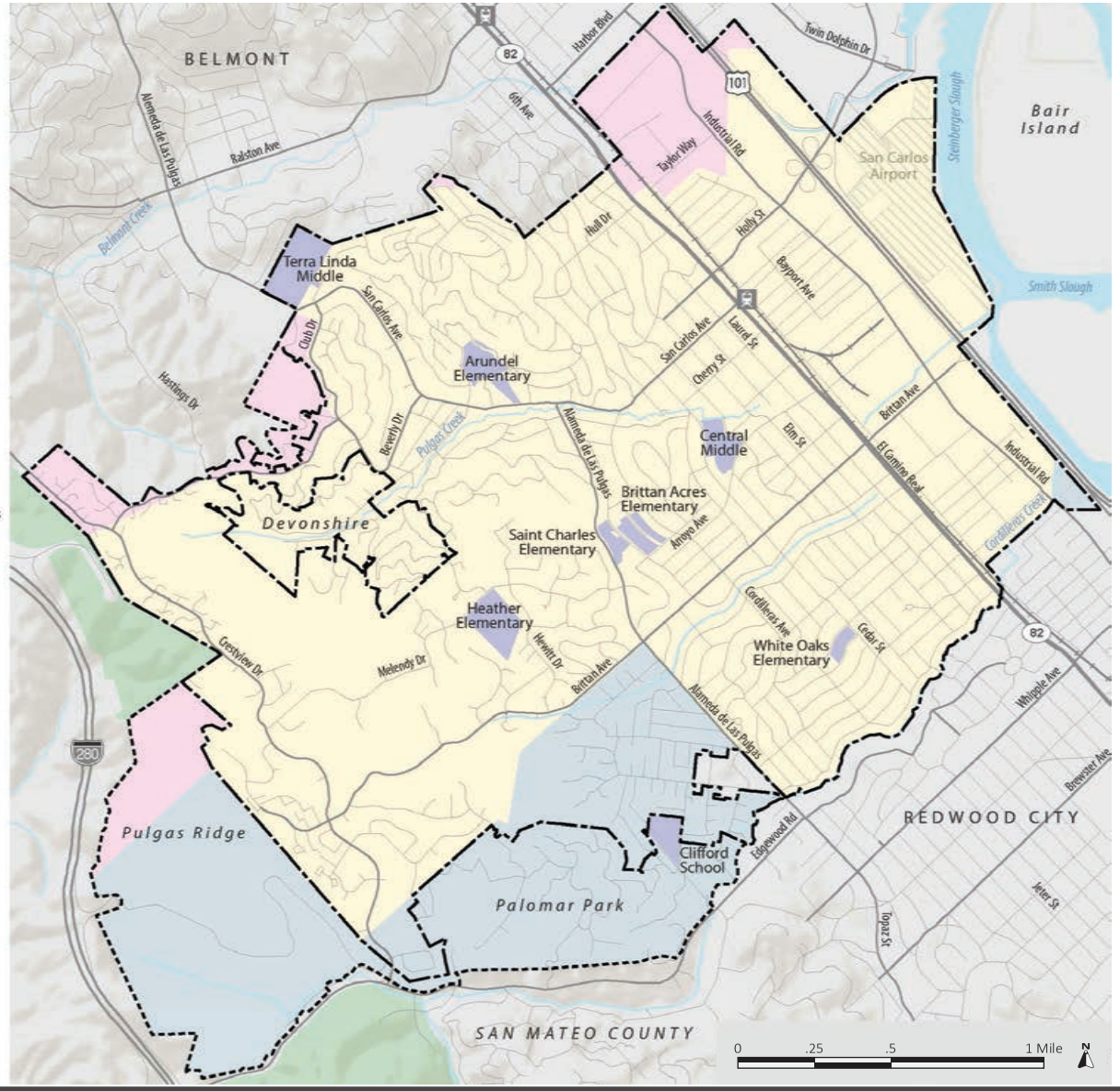
Belmont-Redwood Shores School District

The current enrollment of BRSSD is 4,019 students.[110] Enrollment in BRSSD has declined over the past five years.

Sequoia Union High School District

SUHSD serves San Carlos, Belmont, and Redwood City high school students. Overall, SUHSD serves approximately 9,741 students on the Midpeninsula with seven schools.[111] Most of the students within San Carlos attend Carlmont High, with some of the students attending Sequoia High.[112] The capacity for Carlmont High School is 2,343 students. Its current enrollment is 2,360 students, exceeding its capacity by 17 students. The capacity for Sequoia High School is 2,515 students. Its current enrollment is 1,903 students, so it is not exceeding its capacity.

[108] City of San Carlos. 2045 General Plan Reset Draft EIR. January 2025.
[109] Ibid.
[110] Education Data Partnership. "Belmont-Redwood Shores Elementary." Accessed February 13, 2025. https://www.ed-data.org/district/San-Mateo/Belmont--Redwood-Shores-Elementary
[111] City of San Carlos. 2045 General Plan Reset Draft EIR. January 2025.
[112] Ibid.



Source: MIG, 2022.

ELEMENTARY SCHOOL DISTRICT BOUNDARIES | FIGURE 3.15-1

Parks

San Carlos contains 62.5 acres of traditional developed parkland.[113] These parks and open space areas provide passive recreation facilities, including trails, views, natural vegetation and wildlife and environmental education facilities. The City's Parks and Recreation Department manages 16 parks, including 3 community parks, 4 neighborhood parks, 5 mini parks, 2 open space parks, and 2 dog parks. Additionally, Eaton Park and Big Canyon Park offer 73 acres of natural open space in the City of San Carlos.

Other open space areas around the city are owned and operated by the Midpeninsula Regional Open Space District (MROSD), San Mateo County, and the State Department of Fish and Wildlife. MROSD manages 26 open space preserves totaling over 57,000 acres.

San Carlos is currently not meeting the standard establish in the City's Parks Master Plan of 2.5 acres of traditional parkland for every 1,000 residents. However, taking into account the City's existing open space, the park standard is met.

Libraries

San Mateo County Libraries is a Joint Powers Authority (JPA), an independent entity with its own Governing Board, consisting of elected officials from each member of the county.

The San Carlos branch of the San Mateo County library system is located at 610 Elm Street, adjacent to City Hall. This library offers a large collection of books and other materials for all ages, computers and Internet access, services such as story times, making, afterschool programs, language conversation clubs, and technology classes. The San Carlos Library currently operates with 11 permanent positions and 9.75 full-time equivalent positions. The San Carlos Library is open 61 hours, seven days per week.

The San Carlos Library is 25 years old and in need of several significant improvements.[114] Currently, the San Carlos Library is expanding onto the second floor of the current facility, adding 1,000 square feet for a makerspace that is estimated to be completed in 2025.[115]

3.15.2 Impact Discussion

For the purpose of determining the significance of the project's impact on public services, would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

[113] City of San Carlos. *2045 General Plan Reset Draft EIR*. January 2025.
[114] Ibid.
[115] Ibid.

1) Fire protection?
2) Police protection?
3) Schools?
4) Parks?
5) Other public facilities?

3.15.2.1 *Project Impacts*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?

As discussed in Section 3.14 Population and Housing, the Plan would result in a net increase of approximately 3,611 residents and 9,794 employees over a 20-year period (refer to Table 3.14-1). The increase in development and population in the Plan area would result in a gradual increase in demand for fire protection services. The associated growth resulting from buildout of the Plan was analyzed in the buildout projections for the 2045 General Plan Reset. The 2045 General Plan Reset EIR concluded that RC-SCFD identified the need for additional staff to meet population growth in the City. As previously described, the RC-SCFD response times exceed the best practice benchmarks, especially for travel time and multi-unit responses. To improve coverage, RC-SCFD recommends that a second ladder truck and Battalion Chief / Incident Commander be added at Station 13 in San Carlos. Future construction of new fire facilities, or renovation or expansion of existing facilities, would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed. The estimated timing or location of these future fire facility improvements are not known at this time, so project-specific environmental impacts that could occur from their construction and operation cannot be determined at this time.

Future development would include new housing and non-residential development, with associated increases to the resident and employee population served by the RC-SCFD. In addition, future development under the Plan could result in buildings up to 155 feet in height above grade or above mean sea level, whichever is more restrictive. Future development under the proposed project would be required to comply with the California Fire Code which regulates, among other topics, hazardous material handling, emergency access, and fire protection systems, including automatic sprinkler system, fire extinguishers, and fire alarms. The City would review plans and conduct construction inspections to ensure that new development complies with existing building and fire code requirements. The 2045 General Plan Reset EIR concluded that, while future development would increase demand on fire protection services, the incremental nature of growth combined with adherence to regulations and procedures already in place, would ensure that RC-SCFD would be involved as future development occurs. Additionally, due to the 2045 General Plan Reset being a

program-level document, project-specific environmental impacts that could occur from future fire facility improvements were too speculative to analyze as part of the 2045 General Plan EIR. Therefore, future construction of new fire facilities, or renovation or expansion of existing facilities, would be subject to separate project-level environmental review pursuant to the California Environmental Quality Act (CEQA), as required, to identify potential environmental impacts and mitigation measures as needed.

Compliance with existing regulations, General Plan goals, policies, and actions, and future project-level environmental review would need to consider impacts on reliability and response times to ensure that impacts on fire protection facilities would be less than significant. **(Less than Significant Impact)**

b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?

Future development would include new housing and non-residential development, with associated increases to the resident and employee population served by the SMCSO. As discussed in Section 3.15.1.2, the SMCSO has indicated that existing stations are adequate and there are no existing plans for expansion or relocation. According to the 2045 General Plan Reset EIR, compliance with State and local regulations and the General Plan goals, policies, and actions described under Section 3.15.1.1, Environmental Setting would ensure that police protection services continue to adequately serve the City (including the Plan). **(Less than Significant Impact)**

c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?

Future development within the buildout horizon of the Plan would cause an increase in student population over the next 20 years. The increase in students would be gradual as housing units are added to the Plan area. The public school districts that serve the Plan area would continue to collect the development impact fees, which each district has adopted, throughout the horizon of the Plan. Therefore, future development would incrementally contribute toward facility upgrades and expansions, which, pursuant to California Government Code Section 65995, has been deemed sufficient to provide full and complete school facilities mitigation for the impacts from the proposed project, regardless of whether the fees are adequate to fully fund the expansion or construction of needed facilities. Future construction of new or renovated school facilities to accommodate growth under the proposed project would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation

measures as needed to reduce potential environmental impacts. The estimated timing or location of future additional facility improvements are not known at this time and would be planned and undertaken by each school district as needed, so project-specific environmental impacts that could occur from their construction and operation cannot be determined at this time and would be determined by each school district acting as lead agency.

With the required payment of development impact fees for new development pursuant to California Government Code Section 65995, General Plan goals, policies, and actions, and future environmental review at the project level for any school facility improvements, impacts to the public-school districts that serve the Plan area would be less than significant. **(Less than Significant Impact)**

d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?

As discussed in Section 3.15.1.2, the City currently provides 2.2 acres of parks per 1,000 residents (which is below the 2.5 acres of park per 1,000 residents standard). Buildout of the Plan would increase demand on parks. According to the 2045 General Plan Reset EIR, growth from the General Plan (including the Plan) would decrease the ratio of parkland per 1,000 population to 1.34 acres of parks per 1,000 residents by 2045. However, the 2045 General Plan Reset EIR acknowledges this represents a “worst case” scenario, as it is expected that parks will be acquired, expanded, and/or made publicly accessible as part of private development over the next 20 years. Potential impacts would occur if the physical expansion or construction of a park would cause significant environmental impacts. The estimated timing or location of such facilities or the exact nature of these facilities are not known at this time, so project-specific environmental impacts that could occur from their construction and operation cannot be determined at this time, and would be determined by the City as lead agency as individual projects were evaluated and as the City undertook expansion of existing or development of new park facilities.

SCMC Section 17.32.030 would continue to require residential development under the Plan to either provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere. Additionally, SCMC Chapter 3.34 requires new residential projects to pay park facility development fees. This would result in an incremental addition of parkland if a residential subdivision or residential development is proposed in the City. While no specific dedicated park facilities are included as part of the proposed Plan, future development on properties greater than one acre would be required to dedicate 15 percent of the total site area toward open space. A proposed 10-foot-wide trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features.

Since future residential development would be required to comply with payment of impact fees pursuant to SCMC Section 17.32.030, implementation of the project would not result in significant impacts to park and recreational facilities. **(Less than Significant Impact)**

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?

New residential and non-residential development would increase the resident and daytime population of San Carlos, incrementally increasing utilization of library services. As discussed in Section 3.15.1.2, the San Carlos Library is in need of several significant improvements, which inhibits the library's ability to meet the community's library needs. Currently the San Carlos Library is expanding onto the second floor of the current facility. Library services are primarily funded by County property taxes, including Measure K, passed in 2016, which supports essential County services and critical facilities. The 2045 General Plan Reset EIR concluded that the potential need for future library facility expansions would be assessed as development occurs. Future construction of new or renovated library facilities to accommodate growth under the proposed project would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed to reduce potential environmental impacts. The estimated timing or location of future facility improvements are not known at this time, so project-specific environmental impacts that could occur from their construction and operation cannot be determined at this time. Therefore, development under the Plan would not require the construction of new library facilities beyond what was analyzed in the 2045 General Plan Reset EIR. **(Less than Significant Impact)**

3.15.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant public services impact?

As discussed above, the associated growth resulting from buildout of the Plan was analyzed in the buildout projections for the 2045 General Plan Reset. Under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail.

Fire Protection Services

The 2045 General Plan Reset EIR concluded that compliance with existing regulations, General Plan goals, policies, and actions, and future project-level environmental review would ensure that impacts on fire protection facilities would be less than significant. Future cumulative development

would be required to comply with the CFC and the City would review plans and conduct construction inspections to ensure that new development complies with existing building and fire code requirements. The 2045 General Plan Reset EIR concluded that compliance with the CFC would ensure any new development proposed in the City meets the most current building and fire codes, thereby increasing safety of the buildings, and reducing the likelihood of a fire emergency, subsequently reducing demand on RC-SCFD services.

Police Protection Services

As discussed under checklist question b), the SMCSO has indicated that existing stations are adequate and there are no existing plans for expansion or relocation. According to the 2045 General Plan Reset EIR, compliance with State and local regulations and the General Plan goals, policies, and actions described under Section 3.15.1.1, Environmental Setting would ensure that police protection services continue to adequately serve cumulative development in the City.

Schools

As required by state law (Government Code Section 65996), cumulative projects that include residential development are required to pay school fees to mitigate the increase in demand on schools generated by new development to a less than significant level. Therefore, consistent with the findings of the 2045 General Plan Reset EIR, cumulative development would not result in a significant cumulative impact on local schools.

Parks

As discussed under checklist question d), growth under the General Plan (including the Plan) would result in increased demand for parks. As a result, the local service providers would need to expand and construct additional parks and other recreational facilities to meet the increased demand and maintain existing service levels. State law allows jurisdictions to require additional development to fund park improvements, and the SCMC requires new residential development to pay development impact fees to help fund parks and recreation. Since future cumulative residential development would be required to comply with payment of impact fees pursuant to SCMC Section 17.32.030, implementation of the project would not result in a cumulatively considerable impact to parks and recreational facilities.

Libraries

As discussed under checklist question e), the San Carlos Library is in need of several significant improvements, which inhibits the library's ability to meet the community's library needs. The 2045 General Plan Reset EIR concluded that payment of County property taxes would ensure adequate library services over the course of the General Plan buildout (including the Plan). Additionally, future construction of new or renovated library facilities would be subject to separate project-level environmental review pursuant to CEQA to identify potential environmental impacts and mitigation measures as needed, with the Library JPA acting as lead agency. Therefore, the proposed project would not result in a cumulatively considerable impact to library services.

As documented above, buildout under the 2045 General Plan Reset (including the Plan) would not contribute to a significant cumulative public services impact. **(Less than Significant Cumulative Impact)**

3.16 Recreation

3.16.1 Environmental Setting

3.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Local

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating recreation impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.9	To the extent possible, retain the channels, floodplains, riparian corridors (including suitable setbacks from top of bank) and closely associated upland areas of Cordilleras, Brittan and Pulgas Creeks and their tributaries as significant open space areas. These areas should be maintained in their natural state to function as appropriate open space areas, greenbelt and to support a riparian habitat.
LU-1.12	Promote the development of publicly accessible urban trails throughout the city to provide access to the natural environment and facilitate non-motorized transportation options.
LU-5.11	Continue to require developers to pay their fair share of the capital cost of public facilities through appropriate development impact and utility connection fees.
LU-8.7	Require new residential development to provide outdoor areas and landscaping or native vegetation, or tree canopy to enhance the surroundings.
LU-9.6	Encourage the location of support facilities such as schools, parks and churches within or near residential neighborhoods.
LU-9.7	Encourage the development of community gardens to provide opportunity for interactions and increase residents' access to healthy foods.
LU-9.8	Encourage developers of new or expanded multi-family residential projects to include gardening spaces for residents of the development as part of the landscaping requirement.
LU-9.16	Require a contribution of parkland and/or fees in-lieu of land dedication as a condition of approval of all new residential subdivisions.

EM-2.7	Retain Pulgas, Brittan, Cordilleras and Belmont Creek channels and their 100-year floodplains wherever possible as natural open space areas. These areas are to function as storm drainage facilities and as open space greenbelts to support natural habitat.
PR-2.1	Consider the recreational needs and interests of all segments of the San Carlos community when evaluating decisions relating to parks facilities.
PR-2.3	Continue to support implementation of trail connections as identified in the City's Potential Trail Connections Plan.
PR-2.7	Encourage new development to provide trails and trail connection easements or dedications where feasible and appropriate.

San Carlos Municipal Code

The SCMC includes various directives pertaining to parks and recreation. The SCMC is organized by title, chapter, and section, and in some cases, articles. Most provisions related to parks and recreation impacts are included in Title 3, Revenue and Finance and Title 17, Subdivisions.

- Chapter 3.34, Park Facility Development Fee, as known as the Park Facility Development Fee Law of the City of San Carlos, applies to new residential development buildings in San Carlos. The Park Facility Development fee for Fiscal Year 2024-25 is $2,709 per bedroom.
- Section 17.32.030, Park and recreation land dedications or in-lieu fees, states that where a park or recreational facility has been designated in the General Plan, and the park or facility is to be located in whole or in part within a proposed subdivision to serve the immediate and future needs of the residents of the subdivision, the subdivider shall be required to dedicate land for park and recreational facilities sufficient in size to serve the residents of the subdivision area. Additionally, if there are no park or recreation facilities designation but the subdivision is within a one-half- mile radius of a neighborhood park or recreational facility the subdivider shall be required to pay a cash payment in lieu of the land equal to the value of the land.

Parks, Open Space, Buildings and other Recreational Facilities Master Plan 2009-2029

The purpose of the Parks Master Plan is to provide the City with a long-term vision for its park system. The Parks Master Plan addresses the City's park service standards, including park acres per capita, walking distance to park facilities, ideas for new parks, and improvements to existing parks. The Parks Master Plan assumes a population of 34,264 in 2030, which is approximately 3,435 more people than the existing conditions of San Carlos in 2024. The City is currently in the process of updating the Parks Master Plan. The following service standards are discussed in the Parks Master Plan:

- Parks Provision Standard: Provide 2.5 acres of developed/active parks for every 1,000 residents in San Carlos.
- Trails Provision Standard: Provide one-mile of hiking trail per 1,000 residents.
- Walkability Policy: Locate a park or recreational facility within ¼- to ½-mile of every resident.

Trails Connections Plan

The San Carlos Trails Committee completed a Trails Connections Plan that was adopted by City Council in February 2007. The Trail Connections Plan identified and prioritized 14 possible connections to our local trail system as well as neighboring regional open space parks and trails, including Pulgas Ridge, and trails within the City of Belmont and the County of San Mateo.

San Carlos Hillside Trails Plan

Adopted in 2012, the San Carlos Hillside Trails Plan identifies 1.62 miles of new trails within Big Canyon Park, Eaton Park, and Devonshire Canyon. The Hillside Trails Plan also provides design guidelines and construction protocols, in addition to a parking program for the identified trails.

3.16.1.2 *Existing Conditions*

Parks

As discussed in Section 3.15 Public Services, San Carlos contains 62.5 acres of traditional developed parkland. San Carlos is currently not meeting the standard establish in the City's Parks Master Plan of 2.5 acres of traditional parkland for every 1,000 residents. However, taking into account the City's existing open space (see below), the park standard is met.

Open Space

Other open space areas around the city are owned and operated by the MROSD, San Mateo County, and the State Department of Fish and Wildlife. MROSD manages 26 open space preserves totaling over 57,000 acres.

3.16.2 Impact Discussion

For the purpose of determining the significance of the project's impact on recreation:

1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
2) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

3.16.2.1 *Project Impacts*

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

As discussed in Section 3.15 Public Services under checklist question d), buildout of the Plan would increase demand on parks and recreation facilities. As noted above, the City is not currently meeting the 2.5 acres of park per 1,000 residents standard (unless open space is included). The 2045 General Plan Reset EIR notes that parks will be acquired, expanded, and/or made publicly accessible as part of private development over the next 20 years. Further, SCMC Section 17.32.030 would continue to require residential development under the Plan to either provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere. Additionally, SCMC Chapter 3.34 requires new residential projects to pay park facility development fees. This would result in an incremental addition of parkland if a residential subdivision or residential development is proposed in the city. However, no specific dedicated park facilities are included as part of the proposed Plan.

Since future residential development would be required to comply with payment of impact fees pursuant to SCMC Section 17.32.030, implementation of the Plan would not substantially deteriorate existing park facilities. **(Less than Significant Impact)**

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

No specific parks or recreational facilities are proposed as part of the Plan. However, future development on properties greater than one acre would be required to dedicate 15 percent of the total site area toward open space. In addition, the Plan proposes to facilitate 10-foot-wide trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features. The Plan is a policy-level document that would facilitate future residential and non-residential development over a 20-year period. As discussed in Section 2.0 Project Description, properties in the Plan that are greater than one acres (gross) would be required to decide 15 percent of the total site toward open space. Additional open space requirements are required in the Sea Level Rise Priority Zone and Creek Front Zone (refer to Table 2.4-7). In addition, the Plan proposes to establish a trail along Belmont Creek to connect Old County Road to Industrial Road. The environmental impacts associated with development of the proposed park and open space are discussed at a program-level throughout this EIR as part of the project. The physical impacts of constructing the park and open space would be reduced to less than significant levels through compliance with existing regulations including General Plan and Specific Plan policies identified in Sections 3.3 Air Quality, 3.4 Biological Resources, 3.5 Cultural Resources, 3.6 Energy, 3.7 Geology and Soils, 3.8 Greenhouse Gas Emissions, 3.9 Hazards and Hazardous Materials, 3.10 Hydrology and Water Quality, 3.13 Noise, 3.18 Tribal Cultural Resources. **(Less than Significant Impact)**

3.16.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant recreation impact?

The associated growth resulting from buildout of the Plan was analyzed in the buildout projections for the 2045 General Plan Reset. Under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail. Growth under the General Plan Reset (including the Plan) would result in increased demand for parks. As a result, the local service providers would need to expand and construct additional parks and other recreational facilities to meet the increased demand and maintain existing service levels. State law allows jurisdictions to require additional development to fund park improvements, and the SCMC requires new residential development to pay development impact fees to help fund parks and recreation. Since future cumulative residential development would be required to comply with payment of impact fees pursuant to SCMC Section 17.32.030, implementation of the project would not result in a cumulatively considerable impact to parks and recreational facilities. **(Less than Significant Cumulative Impact)**

3.17 Transportation

The following discussion is based, in part, on a Transportation Analysis completed by Nelson\Nygaard Consulting Associates dated December 13, 2024. This report is included as Appendix G to this DEIR.

3.17.1 Environmental Setting

3.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a VMT metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by the Governor's Office of Land Use and Climate Innovation (LCI) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize LCI to set specific VMT impact thresholds, but it did direct LCI to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on LCI guidance.

Regional and Local

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Congestion Management Program

C/CAG is the designated Congestion Management Agency (CMA) for San Mateo County. In accordance with California Government Code Section 65088, each CMA is required to prepare and adopt a Congestion Management Program (CMP) on a biennial basis. The CMP includes monitoring and evaluation of LOS along the designated CMP network, which includes U.S. 101 and the El Camino Real (State Route 82)/Holly Street intersection in San Carlos. With the updating of CEQA per the requirements of SB 743, maintenance of LOS standards is no longer part of the environmental review process. The last CMP update was in 2023.

C/CAG Transportation Demand Management Policy

The C/CAG TDM Policy provides guidelines regarding analysis of the transportation impacts of development projects in municipalities in San Mateo County. Unless exempted from the policy, local jurisdictions are required to notify C/CAG of incoming development that is estimated to generate an average of 100 trips per day. For affected projects, applicants are required to complete a TDM checklist and implement measures to reduce the estimated number of trips and their adverse effects on traffic operations. The type and magnitude of TDM measures are based on the land use type and project size.

City of San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating transportation impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.3	Ensure that development within the TOD corridor maintains and improves the mobility of people and vehicles along and across the corridor.
LU-1.4	Establish and support the El Camino Real/Caltrain multimodal TOD corridor for the purpose of the mobility of people and vehicles along and across the corridor.
LU-1.5	Support land use patterns in the TOD corridor that will attract and serve riders of public transit.
LU-3.10	Encourage the creation of safe, walkable environments that include elements such as wide, smooth sidewalks, good lighting, safe crosswalks, clear signage, curb bulbouts, curb cuts, street furniture and trees and traffic-calming measures which allow people of all ages and abilities to exercise and safely access public transportation, community centers and schools and goods and services.
LU-3.13	Provide for safe and convenient pedestrian and bicycle connections between residential and commercial areas throughout San Carlos.
CSH-1.1	Widths of streets and highways should be sufficient to address existing and projected traffic volumes, emergency access requirements, while providing positive pedestrian and bicycle experiences.
CSH-2.2	Provide for adequate pedestrian and bicycle facilities as viable transportation modes in San Carlos, as recommended in the San Carlos Bicycle and Pedestrian Master Plan.

Policy	Description
CSH-2.3	Access to public transportation facilities should be convenient and designed to encourage use of public transit.
CSH-3.1	Strive to reduce baseline and development-related traffic by implementing and enforcing the Transportation Demand Management Ordinance.
CSH-3.2	Support city-wide efforts to reduce vehicular trips within and through the community.
CSH-3.3	Support the incorporation of Transportation Demand Management measures in new development to reduce traffic impacts.
CSH-3.4	Support Smart Growth and Sustainability principles to reduce travel time from house to jobs, provide affordable transportation to all members of the community, allow compact mixed-use development and decrease dependency on automobiles.
CSH-3.5	Street and right-of-way widths should be designed and constructed in accordance with the street standards established in this plan, the City Subdivision Ordinance and Standard Details. However, flexibility for street widths should be permitted with sensitivity to slope, neighborhood character, traffic volume, emergency access requirements, and pedestrian/bicycle needs.
CSH-3.9	Where appropriate and relevant, based on the location and scope of a development project under consideration, the City shall consider regional, as well as local traffic impacts when assessing new development projects.
CSH-4.2	Reduce potential conflicts, safety hazards and physical obstacles between bicyclists, automobiles and pedestrians and ensure compliance with the Americans with Disabilities Act, and including any other applicable State and federal laws, regulations and guidelines.
CSH-4.3	The safety of bicyclists, pedestrians, as well as motorists shall be considered in street design wherever possible.
CSH-5.1	Connect neighborhoods, school sites, activity centers, transportation centers, recreational sites and other important community amenities with sidewalks, pedestrian paths, trails and bikeways.
CSH-5.3	Support an interconnected system of pedestrian ways, paths, trails, bikeways and transit routes within the city and between adjacent communities.
CSH-6.1	Bicycling and walking facilities should be incorporated into all new development projects to the maximum extent feasible.
CSH-6.2	Support transit oriented development with mixed, dense land use that reduces the need to travel and that is linked to good transit. The City shall work with local, regional, and State representatives to encourage the support and funding of transit-oriented development projects.

San Carlos Complete Streets Policy

The City adopted a Complete Streets Policy in 2012 to support the development of a multimodal transportation network that serves all categories of users. Provisions of the policy include applying a context-sensitive approach to local conditions so that appropriate facilities will be designed to best serve the needs of residential as well as commercial areas, with consideration for the urban, suburban, or rural nature of the location.

San Carlos Vehicle Miles Traveled Policy

In accordance with SB 743, the City adopted VMT thresholds on Nov 12, 2024 (Resolution No. 2024-118) that were based on assessment of local needs and development characteristics, to be used in evaluating the potential VMT impacts of land development and transportation projects. Within the VMT policy certain projects are considered to have less-than-significant transportation impacts and no further transportation analysis is required. These projects include nonresidential projects under 10,000 square feet, residential projects with 10 or fewer single-family units or 15 or fewer multi-family units; projects located within Low VMT Areas or within a TPA; 100-percent-restricted affordable residential projects in infill locations; neighborhood-serving retail or public facility projects that are less than 30,000 square feet; and transportation projects that do not add vehicle capacity. Projects not screened out through the criteria above are required to complete a VMT analysis to determine if there would be a significant VMT impact. An impact would be considered significant if the following thresholds are exceeded:

- Total project-generated VMT per service population exceeds a level of 15 percent below the regionwide baseline VMT rate.
- Project-generated VMT per resident exceeds a level of 15 percent below the regionwide baseline VMT rate.
- Project-generated VMT per employee exceeds a level of 15 percent below the regionwide baseline VMT rate.
- The project increases total (boundary) countywide VMT compared to cumulative “no project” conditions.
- The project is inconsistent with the Regional Transportation Plan/Sustainable Community Strategy Plan (Plan Bay Area).

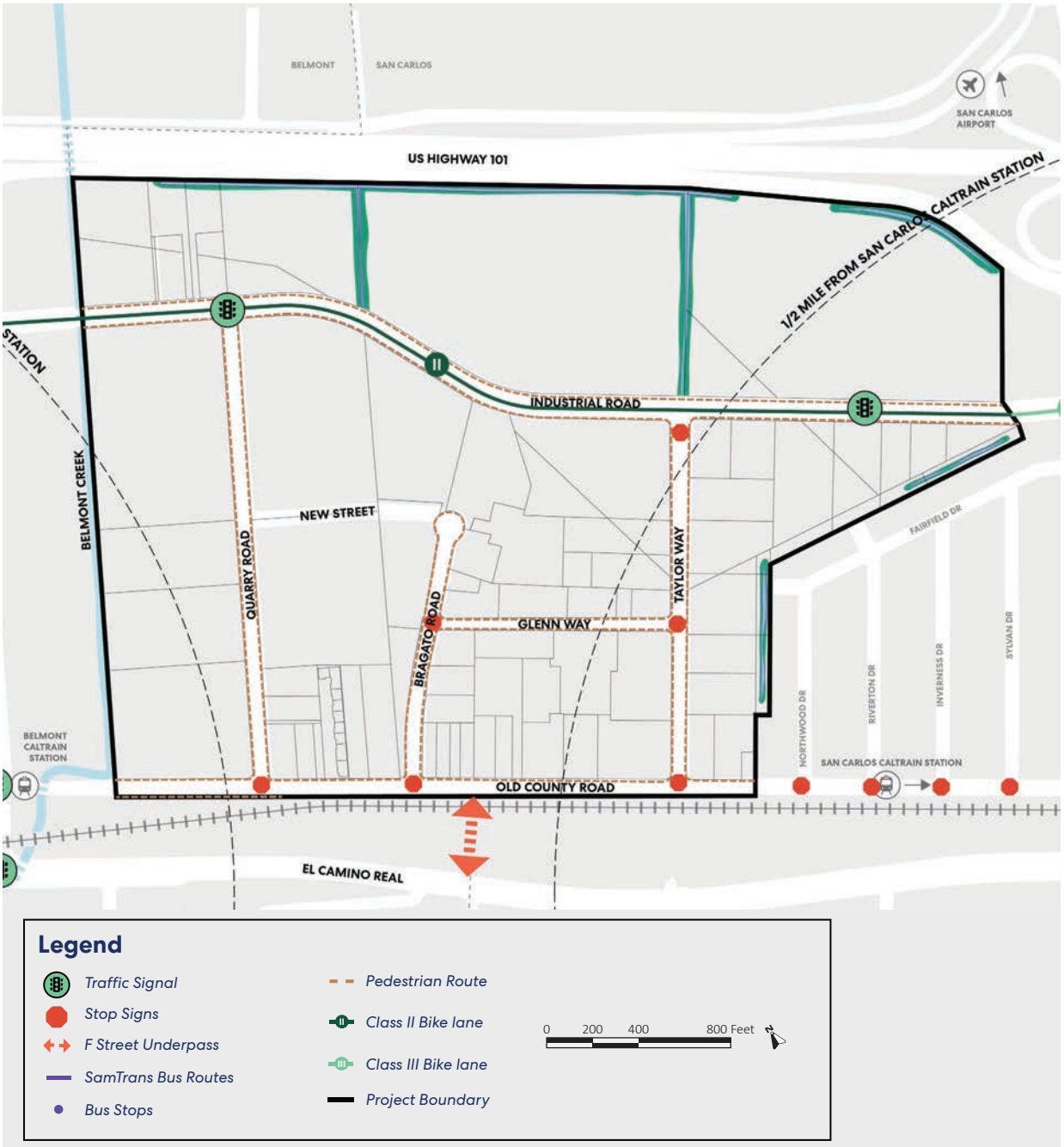
San Carlos Bicycle and Pedestrian Master Plan

The Bicycle and Pedestrian Master Plan (BPMP) was adopted in June 2020. The BPMP establishes a long-term vision for improving walking and bicycling in San Carlos and presents a strategy to develop a comprehensive bicycling and walking network that provides access to transit, schools and downtown. This plan provides guidance to City staff and the development community in building a balanced transportation system where active modes are supported and accessible. The goal of the plan is to promote walking and bicycling through the creation of safe, comfortable, and connected networks, and to encourage alternatives to single-occupancy motor vehicle trips.

3.17.1.2 *Existing Conditions*

Roadway Network

The existing transportation infrastructure in the Plan is shown on Figure 3.17-1, and described below.



EXISTING TRANSPORTATION NETWORK | FIGURE 3.17-1

Regional Access

Regional vehicular access to the Plan area is provided by U.S. 101 and CA-82 (El Camino Real). U.S. 101 serves San Francisco and the Peninsula/South Bay. Access to and from U.S. 101 in both the northbound and southbound directions is provided via the on-/off-ramps just outside the Plan area east of Industrial Rd. and Holly Street. There are also a pair of southbound-only on- and off-ramps accessed via Harbor Boulevard. El Camino Real serves the Peninsula/South Bay and runs from San Jose to Daly City. The Caltrain railroad tracks, which run on an elevated berm through San Carlos, separate CA-82 from the study area. Access to and from El Camino Real in both the northbound and southbound directions is provided via signalized intersections at Harbor Boulevard and Holly Street.

Local Access

The Plan area is served by the following local roadways:

- **Industrial Road** is a local north/south arterial road consisting of two travel lanes in each direction with bi-directional, curbside Class II bike lanes and a turn lane median for half of the roadway.
- **Old County Road** is a local north/south arterial road consisting of travel lane in each direction with storage turn lanes at intersections. A short section of the roadway has a striped Class II bike lane, and the rest of the corridor has Class III bike sharrows.
- **Holly Street** is a local east/west arterial road consisting of two travel lanes in each direction that widens near Industrial Road and the U.S. 101 on-/off-ramps.
- **Harbor Boulevard** is a local east/west arterial road consisting of two travel lanes in each direction with no turn lanes, medians, or bike lanes. The north terminus of the roadway is the on-/off-ramps for U.S. 101.
- **Taylor Way** is a local road consisting of one travel lane in each direction with no marked centerline or bike lanes.
- **Quarry Road** is a local road consisting of one travel lane in each direction with no marked centerline or bike lanes.

Pedestrian and Bicycle Facilities

The Plan area has pedestrian facilities that include sidewalks, pathways, curb ramps, crosswalks, curb extensions.

Bicycle facilities in the EIR Study Area include Class II bike lanes and Class III bike routes. There are continuous bike lanes along Industrial Road, as well as some segments Old County Road. Bicycle routes are also designated along segments of Old County Road.

Transit Service

San Mateo County Transit District (SamTrans) provides fixed route bus service in San Carlos and throughout San Mateo County. There are no bus stops in the Plan area. Nearby, on El Camino Real to the west of the site, several bus stops provide convenient local transportation options.

Caltrain is the commuter rail line serving the San Francisco Peninsula, connecting San Carlos with San Francisco to the north and San Jose and Gilroy to the south. On weekdays, there are 31 trains servicing the San Carlos Station in the northbound and southbound directions. On weekends, there are 16 trains that stop at the station in each direction. The San Carlos Caltrain Station is located on El Camino Real near the intersection with San Carlos Avenue. Portions of the Plan are also within 0.5 miles of the Belmont Caltrain station.

3.17.2 Impact Discussion

For the purpose of determining the significance of the project's impact on transportation, would the project:

1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4) Result in inadequate emergency access?

3.17.2.1 *Project Impacts*

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

Roadways

As described in Section 2.0 Project Description, a new street segment from Quarry Road to Bragato Road would be implemented as part of the Plan. In addition, the Plan would include other roadway improvements such as a new signalized intersection on Industrial Road at Quarry Road and Taylor Way. In addition, the traffic calming measures would be implemented at intersections as shown on Figure 2.4-5. The Plan also includes intersection modifications, as summarized in Table 3.17-2 in Section 3.17.3 Non-CEQA Effects.

Bicycle and Pedestrian Facilities

The Plan would be consistent with the Bicycle and Pedestrian Master Plan. As summarized above in Table 2.4-3 and shown in Figure 2.4-13, the Plan would include pedestrian and bicycle improvements to create opportunities for a variety of travel options. Industrial Road, Old County Road, and Taylor Way would have two-way protected bike lanes. The Plan includes three pedestrian paseos, one along the new north-south street connecting Bragato Road to Quarry Road, and two along Bragato Road to facilitate more connectivity and accessibility in the district. A proposed trail along Belmont Creek provides an additional walking route to connect Old County Road to Industrial

Road and fosters greater access with the natural features. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing pedestrian facilities.

Transit Facilities

Portions of the Plan are located within 0.5 mile of a major transit stop (San Carlos and Belmont Caltrain stations) and the Plan is entirely within a TPA. There is no direct transit service within the Plan area; however, the Plan would facilitate improvements to the bicycle and pedestrian network, as describe above. These improvements would encourage connections to nearby rail and bus transit.

Implementation of the Plan would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

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

Per the City's VMT Policy (Resolution No. 2024-118) and CEQA Guidelines Section 15064.3(b), projects within TPAs are considered to have less-than-significant transportation impacts and no further transportation analysis is required. The Plan is located in a TPA and therefore, future development projects would result in a less than significant VMT impact. Further, as described in Section 2.3.7 of this EIR, all new development in the Plan, with previously noted exceptions for 100% affordable housing, small housing projects, and small non-residential projects, would be subject to TDM requirements. The Plan also includes parking maximums and no parking minimums as a strategy to reduce auto usage. Consistent with C/CAG's TDM Policy, it is a Plan requirement that all new development, with noted exceptions, would achieve a 25 percent vehicle trip reduction. **(Less than Significant Impact)**

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c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The Plan is a long-range planning document that would guide future development within the Plan but would not introduce any physical features that would create an obvious safety hazard. As previously discussed, the Plan includes a new street segment from Quarry Road to Bragato Road. In addition, the Plan would include other roadway improvements such as a new signalized intersection on Industrial Road at Quarry Road and Taylor Way. Any such future improvements would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to introduce any hazardous design features. Projects that would include the development of new streets, circulation improvements and access points would be reviewed for compliance with safety guidelines and standards as part of the development review process, including General Plan Policy CSH-3.5, CSH-4.2, and CSH-4.3. Safety considerations include maintenance of a substantially

clear line of sight at driveways between the driver of a vehicle waiting to enter the through street and the driver of an approaching vehicle.

Based on the above analysis, the project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

The 2045 General Plan Reset EIR concluded that buildout of the General Plan (including the proposed Plan) would not be expected to result in inadequate emergency access. Future development under the Plan would be required to comply with City and County standards and requirements and would undergo review by public safety officials as part of the approval process. The Plan proposes a new road connecting Quarry Road to Bragato Road that would enhance emergency access within the Plan area.
(Less than Significant Impact)

3.17.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant transportation impact?

Consistency with Circulation System Programs, Plans, Ordinances, or Policies

The geographic area for consistency with local programs, plans, ordinances, or policies is citywide. Future cumulative projects would be required to evaluate regional and local traffic impacts pursuant to General Plan Policy CSH-3.9 to ensure that acceptable levels of service are maintained. The 2045 General Plan Reset EIR concluded that with adherence to General Plan policies, future development would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

VMT

The Plan is located in a TPA and therefore, future development projects implementing the Plan would result in a less than significant VMT impact. Therefore, the buildout of the Plan would not contribute to a significant cumulative VMT impact.

Design Hazards, Incompatible Uses, and Emergency Access

The geographic area for cumulative design hazards, incompatible uses, and emergency access is the general vicinity near the Plan. Future cumulative development would be subject to the City's development review process to ensure design standards are met, that there are no design hazards, or incompatible uses, and that there is adequate emergency access. Thus, cumulative projects

would not result in a significant cumulative impact due to design hazards, incompatible uses, or emergency access.

As discussed above, implementation of the Plan would result in less than significant cumulative transportation impacts. **(Less than Significant Cumulative Impact)**

3.17.3 Non-CEQA Effects

While the evaluation of project CEQA impacts on the transportation system is based on VMT, in accordance with City practice and General Plan Policy CSH-3.9, the following discussion is included for informational purposes to analyze non-CEQA transportation issues including vehicle delay resulting from planned growth on roads serving the Plan area.

3.17.3.1 *Trip Generation*

The magnitude of traffic produced by new development and the locations where that traffic would appear are estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. In determining project trip generation, the volume of traffic entering and exiting the site is estimated for the AM and PM peak hours.

Trip generation considers net new uses and removes existing uses projected for removal or change, as those trips would have been captured in existing traffic data collection. The trip generation also includes the default 25 percent TDM reduction, with the noted exceptions for 100% affordable housing and small residential and non-residential trips.[116] Trip generation for the various uses assumed for build out under the Plan are summarized in Table 3.17-1 below.

[116] This trip reduction level aligns with C/CAG's requirements for transit-oriented development (TOD) projects regardless of size or land use type. Since the Plan area is fully inside a transit priority area per C/CAG guidance, the 25 percent trip reduction was selected and applied.

Table 3.17-1: Trip Generation Estimates

Land Use Category[1]	Daily Trips	AM Peak Hours			PM Peak Hours		
		In	Out	Total	In	Out	Total
Existing (to be removed)							
Light Industrial	1,476	197	27	224	28	169	197
General Office	488	60	8	68	11	54	65
Animal Hospital/Veterinarian Clinic	215	24	12	36	14	21	35
Warehouse	103	8	2	10	3	8	11
A. Total Trips to be Removed	**(2,282)**	**(289)**	**(49)**	**(338)**	**(56)**	**(252)**	**(308)**
Plan Buildout[1]							
R&D	32,841	2,503	550	3,053	465	2,440	2,905
Light Industrial	3,409	456	62	518	64	391	455
General Office	1,951	241	33	274	44	215	259
Retail	5,402	86	53	139	203	212	415
Multi-Family Residential	8,581	161	538	699	450	287	737
Warehouse	68	5	2	7	2	5	7
Manufacturing	2,337	254	80	334	113	248	361
Gross Trips	**54,589**	**3,706**	**1,318**	**5,024**	**1,341**	**3,798**	**5,139**
TDM Reduction (25%)	(13,647)	927	339	1,257	335	950	1,285
B. Total Plan Trips	**40,942**	**2,779**	**988**	**3,767**	**1,006**	**2,848**	**3,854**
C. Net Trips[2]	**38,660**	**2,490**	**939**	**3,429**	**950**	**2,596**	**3,546**

[1] For purposes of trip generation, Plan buildout does not include the 52,000 square feet assumed for the PG&E parcel.

[2] Net trips are calculated by subtracting trips generated by existing conditions (A) generated from trips generated under Plan build out conditions (B).

As shown in Table 3.17-1, build out of the Plan would result in an overall net increase of 38,660 daily trips.

3.17.3.2 *Intersection Analysis*

Existing with Plan

Under the Existing with Plan scenario, the Old County Road and Holly Street intersection would continue to exceed General Plan thresholds. In addition, the following intersections would not meet performance standards with the addition of Plan trips:

- Old County Road/Harbor Boulevard
- Old County Road/Quarry Road
- Old County Road/Taylor Way

Cumulative with Plan

Under the Cumulative with Plan scenario, the Old County Road and Holly Street intersection would continue to exceed General Plan thresholds. In addition, the following intersections would not meet performance standards under the Cumulative with Plan scenario:

- Old County Road/Harbor Boulevard
- U.S. 101 Ramps/Holly Street
- Industrial Road/Holly Street
- Industrial Road/Quarry Street
- Industrial Road/Taylor Street
- Industrial Road/PAMF Driveway
- Old County Road/Quarry Road
- Old County Road/Taylor Way

The Plan does not make any recommendations for physical improvements that would increase vehicle capacity. The Plan includes other interventions, such as repurposing or reconfiguring existing lanes, adding turn pockets at intersections, modifying traffic signal timing, and adding new traffic control devices, as summarized in Table 3.17-2 below. Based on preliminary evaluation, it is not expected that any of the improvements would require acquisition of additional right-of-way. As designs are developed, each roadway improvement would undergo project-level environmental review, as appropriate.

Table 3.17-2: Proposed Intersection Configuration Modifications

Intersection	Intersection Modifications
Industrial Road/Harbor Boulevard	• Westbound approach becomes left, left/through, and through/right • Eastbound and Westbound change to split phasing • Northbound approach becomes left, left, and through/right • Northbound lefts change to protected only phasing • Industrial Road will have two southbound receiving lanes for at least ½ block and transition to a standard 3-lane section with two-way left turn lane where future parcel development guides appropriate location
Old County Road/Harbor Boulevard	• Southbound approach becomes left, through/right • Northbound approach changes to protect/permitted phasing (southbound remains permitted) • Westbound approach becomes left, left/through, through/right • Eastbound/westbound split phasing to remain

Intersection	Intersection Modifications
	• Old County Road will have two southbound receiving lanes and carry to Quarry Road
U.S. 101 Ramps/Holly Street	No Changes
Industrial Road/Holly Street	• Northbound and southbound become a single through lane with left turn pockets • Other changes per U.S. 101/Holly Street • Northbound right turn changes reflect U.S. 101/Holly Street. project with new pedestrian crossings • All dedicated right turn lanes run with overlap phases as applicable • Eastbound approach becomes left, through, through, and through/right Eastbound left turns becomes protected phasing
Old County Road/Holly Street	• Westbound adds a short right turn pocket as ROW permits • Northbound adds a right turn pocket • All dedicated right turn lanes run with overlap phases as applicable
Industrial Road/Quarry Road	• Northbound and southbound become a single through lane with left turn pockets • Signal remains two-phase, permitted lefts except southbound left protected in AM only (flashing yellow arrow otherwise)
Industrial Road/Taylor Way	• New signalized intersection • Northbound and southbound become a single through lane with left turn pockets • Eastbound lane configuration remains as existing • Two-phase, concurrent permitted phasing
Industrial Road/PAMF Driveway	• Westbound lane configuration remains as existing: requiring two southbound receiving lanes on Industrial transition to southbound approach configuration at Holly Street • Eastbound and westbound split phasing • Permitted lefts, except southbound left protected-permitted in AM only (flashing yellow arrow otherwise)
Old County Road/Quarry Road	• Remains unsignalized (should be monitored throughout Plan buildout for potential signalization) • Southbound left turn pocket, carried from 2nd southbound receiving lane at Harbor Road intersection.
Old County Road/Taylor Way	No Changes

Source: Nelson\Nygard. *Northeast Area Specific Plan (NEASP) – Transportation Analysis (FINAL)*. December 2024.

3.18 Tribal Cultural Resources

3.18.1 Environmental Setting

3.18.1.1 *Regulatory Framework*

State

Senate Bill 18

The intent of SB 18 is to aid in the protection of traditional tribal cultural places through local land use planning by requiring city governments to consult with California Native American tribes on projects which include adoption or amendment of general plans (defined in Government Code Section 65300 et seq.) and specific plans (defined in Government Code Section 65450 et seq.). SB 18 requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process.

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a TCR, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a TCR or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the NAHC as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Regional and Local

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating tribal cultural resource impacts resulting from planned development within the City including the following:

Policy	Description
LU-1.10	Require that development within the Pulgas, Brittan and Cordilleras Creek watersheds shall preserve watershed integrity, including natural vegetation, soil and slope stability, water quality, scenic values and potential archaeological resources.
LU-12.1	Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.
LU-12.5	Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California native American Graves Protection and Repatriation Act and other appropriate laws.

3.18.1.2 *Existing Conditions*

On July 2, 2024, the City sent letters to tribes listed by the NAHC as having a potential affiliation to the Plan area. The City did not receive any requests from the tribes to consult pursuant to SB 18 or AB 52.

As discussed in Section 3.4 Cultural Resources, no archaeological resources were identified within the Plan or immediate vicinity. The Sacred Lands File results were also negative. Therefore, there are no known tribal cultural resources present within the Plan area. However, it is always possible that intact prehistoric archaeological deposits are present at subsurface levels, especially because the Plan was historically on the bay shore before the area was dredged in the late 1940s.

3.18.2 Impact Discussion

For the purpose of determining the significance of the project's impact on tribal cultural resources, would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.18.2.1 *Project Impacts*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

As described in Section 3.18.1.1, a TCR is defined under AB 52 as a site, feature, place, cultural landscape that is geographically defined in terms of size and scope, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources, or if the City of San Carlos, acting as the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a TCR. There are no known TCRs within the Plan area.

Pursuant to SB 18 and AB 52, the City of San Carlos sent letters to tribes listed by the NAHC as having a potential affiliation to the Plan area. The Amah Mutsun Tribal Band of San Juan Bautista responded to the NOP. The tribe recommended that a Sacred Lands File and CHRIS record search be completed for the Plan area. As discussed in Section 3.4 Cultural Resources, no archaeological resources were identified within the Plan area or immediate vicinity as part of the CHRIS records search and the Sacred Lands File results were also negative. The City did not receive any requests from the tribes to consult pursuant to SB 18 or AB 52.

Compliance with the General Plan policies listed in Section 3.18.1.1, as well as existing federal and state law, would protect unrecorded TCRs in the Plan area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing

the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

As discussed under checklist question a), no TCRs are identified within the Plan area and future development would comply with existing regulations and the General Plan policies to protect TCRs that may be discovered during future construction activities. **(Less than Significant Impact)**

3.18.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact?

The geographic area for cumulative TCR impacts is the Plan area and the adjacent areas, as it is assumed development in the area would affect similar resources. Future development projects that would occur during the 20-year timeframe for buildout of the Plan (inside or outside the Plan boundary) would comply with all applicable regulations, including AB 52 and General Plan polices LU-12.1 and LU-12.5 and to protect unrecorded TCRs. For these reasons, cumulative projects would not result in a significant cumulative TCR impact. **(Less than Significant Cumulative Impact)**

3.19 Utilities and Service Systems

The following discussion is based, in part, on Water Supply Assessments (WSAs) completed by the California Water Service Mid-Peninsula District (Cal Water Mid-Peninsula District) and Mid-Peninsula Water District (MPWD) dated January 2025 and February 2025, respectively; and a Proposed Infrastructure Narrative completed by BKF dated September 2024. These reports are included as Appendices H, I, J, respectively.

3.19.1 Environmental Setting

3.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of San Carlos is in contract with the Cal Water Mid-Peninsula District and the Mid-Peninsula Water District (MPWD), both are public agencies. Cal Water Mid-Peninsula District utilizes San Carlos' water infrastructure to distribute water. The MPWD, on the other hand, utilizes its own infrastructure. Cal Water Mid-Peninsula District adopted its most recent UWMP in June 2021; MPWD adopted its most recent UWMP in September 2021. The large majority of the Plan area is served by MPWD, while a smaller area along Old County Road is served by Cal Water, as shown on Figure 3.19-1.

Bay Delta Plan Amendment

The reliability of water supplies for Cal Water Mid-Peninsula District and MPWD is impacted if, and when, the Bay Delta Plan Amendment is enacted, because the sole source of their water supplies is from the San Francisco Public Utilities Commission (SFPUC)'s Regional Water System (RWS). In December 2018, the SWRCB adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, known as the Bay-Delta Plan Amendment, to establish water quality objectives to maintain the health of the Bay-Delta ecosystem and increasing salmonid populations. The Bay-Delta Plan Amendment requires the release of 30 to 50 percent of "unimpaired flow" for three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) from February through June during normal years and drought conditions.

If the Bay-Delta Plan Amendment is implemented, the SFPUC would be able to meet projected water demands for their retail customers in normal years but would experience supply shortages in single dry years and multiple dry years. This impacts the water supplies of both Cal Water Mid-

Peninsula District and MPWD, as documented in their current UWMPs for single dry years and multiple dry years. The SFPUC has initiated an Alternative Water Supply Planning Program to meet its retail and wholesale customer needs and limit rationing to a maximum of 20 percent system wide.

There is much uncertainty surrounding implementation of the Bay-Delta Plan Amendment. Since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both federal and state courts, challenging the SWRCB's adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation. This litigation is in the early stages and there have been no dispositive court rulings as of this date. Nevertheless, the Cal Water Mid-Peninsula District and MPWD UWMPs conservatively assume that the Bay-Delta Plan Amendment would be implemented in quantifying future water supplies and reliability.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the California Integrated Waste Management Board (CIWMB), required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels) by 2000 and thereafter. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a WSA containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;

- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle released an analysis titled "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals" in August 2020 (revised November 2020), which recommended maintaining the disposal reduction targets set forth in SB 1383.[117]

California Green Building Standards Code

CALGreen establishes mandatory green building standards for all buildings in California. The code is updated every three years.[118] CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

[117] CalRecycle. "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals (DRRR-2020-1693)." Accessed August 19, 2024. https://www2.calrecycle.ca.gov/Publications/Details/1693.
[118] California Building Standards Commission. "California Building Standards Code." Accessed July 25, 2024. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.

Local

Mid-Peninsula Water District Water Efficient Landscape Ordinance

MPWD, which serves the large majority of the Plan area, adopted a Water Efficient Landscape Ordinance (WELO) Ordinance (No. 115) in 2015. MPWD requires completion of a water efficient landscape application for any new construction with 500 square feet or more of landscape, or rehabilitated landscape of 1,000 square feet or more that requires a building permit, plan check, or design review. In coordination with the City, MPWD reviews landscape plans to verify compliance with the code requirements.

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating utilities and service system impacts resulting from planned development within the City including the following:

Policy	Description
EM-2.7	Retain Pulgas, Brittan, Cordilleras and Belmont Creek channels and their 100-year floodplains wherever possible as natural open space areas. These areas are to function as storm drainage facilities and as open space greenbelts to support natural habitat.
EM-5.3	Promote the conservation and efficient use of water in new and existing residences and by commercial and industrial consumers.
EM-5.4	Encourage the use of drought-tolerant plants and efficient watering techniques for all City landscaping.
EM-5.5	Recycled water distribution system (purple pipe) should be used for landscaping and other non-potable water uses for residential, commercial and industrial customers, where technically and financially feasible.
EM-5.7	Encourage site designs that manage the quantity and quality of storm water run-off.
EM-5.9	Sewer service may be extended outside the city limit only as required to protect public health due to failing septic systems in accordance with the following policies: • Extension of sewer service would be denied if there is insufficient capacity in the wastewater collection system. • No change to the land use would occur. • The extension of sewer service could not be used to enable further subdivision. • The property owner would be required to annex as such time as a complete consolidation of properties could be annexed. • The property owner would be required to complete all improvements necessary to meet City building and engineering standards. • Applicant to assure payment of all sewer connection, plan checking and inspection fees.
EM-12.3	Encourage the public and private sectors to utilize reusable, returnable, recyclable, environmentally-friendly products and repairable goods through incentives, educational displays and activities, as well as City purchasing policies and practices.

Policy	Description
ESPS-2.1	Improve and maintain City storm drainage infrastructure in a manner that reduces flood hazards.
ESPS-2.2	Maintain and prioritize restoration of a healthy riparian corridor in City-maintained flood control channels such as Pulgas Creek and Belmont Creek to reduce the risk of flooding due to erosion, siltation, blockage, and heavy undergrowth; and increase community access to channels with improved stormwater and flood management strategies.
ESPS-2.3	Maintain a strong and enforceable Stream Development and Maintenance Ordinance for all city creeks and their tributaries.
ESPS-2.4	Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.
ESPS-2.7	Coordinate with neighboring jurisdictions on approaches to flooding and creek maintenance.
ESPS-2.10	Incorporate stormwater drainage systems in development projects to effectively control the rate and amount of runoff to prevent increases in downstream flooding potential.
ESPS-3.12	Ensure adequate water supply is available.
CSS-2.1	Improve and maintain City storm drainage infrastructure in a manner that reduces flood hazards.
CSS-2.2	Maintain a healthy riparian corridor in City-maintained flood control channels to reduce the risk of flooding due to erosion, siltation, blockage and heavy undergrowth.
CSS-2.4	Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.
CSS-2.12	Incorporate stormwater drainage systems in development projects to effectively control the rate and amount of runoff, so as to prevent increases in downstream flooding potential.

San Carlos Municipal Code

The SCMC is the primary document that regulates the policies and practices of the City. The SCMC contains the Zoning Code, the Subdivision Ordinance, the Building and Construction Code, and other titles that are important in implementing the goals, policies, and actions of the General Plan. The SCMC includes various directives pertaining to water as follows:

- Chapter 8.04, Solid Waste, also known as the solid waste ordinance, contains provisions for solid waste collection and disposal. The chapter requires all residential, commercial, or industrial properties in the City to contract with a City franchisee for the removal and disposal of solid waste generated by the property. The franchisee is authorized to charge all customers a fee for the collection and transport of the solid waste.
- Chapter 8.05, Recycling And Diversion Of Construction And Demolition Debris, requires that each local jurisdiction in the State divert fifty percent of solid waste from landfill by December 31, 2000, through source reduction, recycling, and composting activities. This chapter establishes diversion rates for construction and demolition debris to meet the AB 939 mandates and reduce the amount of solid waste that is landfilled. In general, projects are required to divert at least 60 percent of all generated tonnage. Every project applicant must submit a waste management plan (WMP) to the Department of Planning and Building as part of the building permit process. The WMP shall include: 1) the estimated volume or

weight of project construction and demolition debris, by materials type; 2) the maximum volume and weight of these materials that can feasibly be diverted via reuse or recycling; 3) the vendor or facility that will be used to collect or receive the material; and 4) the estimated volume or weight of construction and demolition debris that will be landfilled.

- Chapter 8.24, Recycling and Collection of other Wastes, regulates the location, height, size and design features of recycling and trash enclosures and containers. These regulations are necessary in order to lengthen the life span of the landfill and decrease the cost of hauling to the landfill in addition to encourage the reuse of recyclable materials.
- Chapter 8.25, Mandatory Commercial and Multifamily Residential Recycling, establishes requirements for the collection, recycling, and processing of recyclable and organic materials generated from commercial facilities, multi-family dwellings, and special events. These requirements are intended to assist the City in meeting the recycling and landfill diversion goals and reduce GHG emissions. Multi-family generators must participate in the programs covered by this chapter and segregate recyclable materials from garbage and deposit them in designated containers provided by the solid waste collector. These requirements apply to all commercial or multi-family solid waste customers that generate two cubic yards or more of garbage per week.
- Chapter 8.60, Mandatory Organic Waste Disposal Reduction, includes the State regulations and mandatory requirements for organic waste recycling and reduction.
- Chapter 8.60.120, Model Water Efficient Landscaping Ordinance Requirements, describes the MWELO requirements for anyone requiring a building or planning permit, plan check, or landscape design review for new construction with a landscape area greater than 500 square feet or rehabilitated existing landscape with a total landscape area greater than 2,500 square feet.
- Chapter 13.04, Sewer Connections, requires connection permits for all projects that connect to any City sewer and sewer capacity charges are imposed on all new development and redevelopment projects to cover costs for maintaining the City's sewer system infrastructure. The sewer capacity charge is based on the volume of estimated wastewater discharge from each new or expanded connection.
- Chapter 13.05, Sewer Lateral Inspection, Repair, and/or Replacement, establishes requirements for property owners to inspect, maintain, repair, and/or replace sewer laterals, sewer relief valves, and sewer backwater valves on each property that is connected to the City's sewer system.
- Chapter 13.08, Sewer Use, establishes standards and conditions, as well as charges and fees, for the use of the sewer system. The chapter includes protection of the sewer system from damage; prohibitions on discharges; control of fats, oils, and grease; and regulation of encroachments into easements; and wastewater effluent limitations.
- Chapter 13.14, Stormwater Management and Discharge Control, regulates non-stormwater discharges to the municipal separate storm sewer; discharge to municipal separate storm sewers from spills, dumping or disposal of materials other than stormwater; and reduces pollutants in stormwater discharges to the maximum extent practicable.
- Chapter 13.16, Storm Drainage Fees, allows for the collection of storm drainage fees pursuant to Health and Safety Code Section 5471 et seq. Fees collected from this chapter

shall be used for the acquisition, construction, reconstruction, maintenance and operation of storm drainage facilities or programs.

- Chapter 15.04.070, Title 24, Part 5, California Plumbing Code with appendices, adopts the latest plumbing code for new construction.
- Chapter 15.04.125, Title 24, Part 11, California Green Building Standards Code (CALGreen), establishes CALGreen's energy and water efficiency mandatory measures for new residential construction.
- Section 17.16.270, Storm Drainage Facilities, requires the subdivider to dedicate rights-of-way for storm drainage purposes that conform to the boundary lines of any natural watercourse, channel, stream, or creek that traverses the subdivision.
- Chapter 18.18.080, Water Efficient Landscaping, establishes water-efficient landscape and irrigation guidelines to promote the conservation and efficient use of water and minimize runoff with the use of automatic control systems. The SCMC requires the estimated total water use of a proposed landscaping not to exceed the maximum applied water allowance.

San Carlos Recycling and Diversion of Construction and Demolition Debris Ordinance

Chapter 8.05 of the San Carlos Municipal Code requires projects that qualify for coverage under CALGreen that generate waste comprised of mixed debris, including both structural debris (e.g., wood, metal, wallboard) and inert materials (dirt, asphalt, brick, and/or cinderblock), to divert at least 60 percent of all generated tonnage. All project applicants are required to submit a properly completed WMP to the City Department of Planning and Building's WMP Compliance Official, as a portion of the building or demolition permit process.

San Carlos Mandatory Organic Waste Disposal Reduction Ordinance

Chapter 8.60 of the San Carlos Municipal Code implements the provisions of AB 1826, which requires businesses and multi-family complexes (with five or more units) that generate specified amounts of organic waste (compost) to arrange for organics collection services. The ordinance contains requirements for single-family organic waste generators, multifamily residential dwellings, and Tier One and Tier Two commercial businesses. Under the ordinance, a Tier One commercial edible food generator is defined as a commercial edible food generator that is either a supermarket, a grocery store with a total facility size equal to or greater than 10,000 square feet, a food service provider, a food distributor, or a wholesale food vendor. A Tier Two commercial edible food generator is defined as either a restaurant with 250 or more seats (or a total facility size equal to or greater than 5,000 square feet, a hotel with an on-site food facility 200 or more rooms, a health facility with an on-site food facility and 100 or more beds, a large venue, a large event, a State agency with a cafeteria with 250 or more seats or total cafeteria facility size equal to or greater than 5,000 square feet, or a local education agency facility with an on-site food facility.

City of San Carlos Design Guidelines

Section 7 of the City's Design Guidelines includes standards for the City's sewer collection system. These sewer guidelines apply to the construction, repair, and relocation of sanitary sewer facilities in the City, including mains, laterals, services, and all related appurtenances. Section 7 provides

guidelines for the design, construction, and abandonment of sewer lines, including design criteria, materials, and installation. More stringent requirements based on specific project conditions may be imposed at the discretion of the Department of Public Works and Engineering Division.

City of San Carlos Sewer Collection System Master Plan

The City prepared a Sewer Collection System Master Plan in 2013. The report presents a comprehensive assessment of the City's sewer collection system in order to identify system capital improvement needs. The Master Plan was also prepared to meet the requirements of the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, which require every collection system agency in California prepare a Sewer System Management Plan. The plan includes a system evaluation and capacity assurance plan and a plan for rehabilitation and replacement of sewers based on their condition.

City of San Carlos Sanitary Sewer Management Plan

The San Carlos Sanitary Sewer Management Plan (SSMP) was originally prepared in July 2014 and last updated April 30, 2021. The SSMP includes eleven elements; including but not limited to goals; operation and maintenance program; design and performance provisions; overflow emergency response plan; fats, oils and grease control program; system evaluation and capacity assurance plan; and monitoring measurement and program modifications among others.

City of San Carlos Citywide Storm Drain System Master Plan

Adopted in 2017, the Citywide SDMP identified causes of flooding within the storm drain system and developed alternatives for improvements that address the flooding.

The City has experienced periodic flooding over the years and these flooding events are generally due to a combination of issues, including storm drain inlet blockages from leaves and debris, stormwater volumes that are greater than the capacity of the City storm drain system, and backwater and overtopping from creeks.

The Storm Drain Master Plan was created to develop alternative improvement projects that would improve the capacity of the system. These alternatives were compared and ranked in order to develop a prioritized CIP that addresses the capacity issues and seeks to prioritize the more severe flooding problems.

City of San Carlos Storm Drain Standards

The City's Storm Drain Standards provides guidelines for the design and construction of storm drain projects. The guidelines establish minimum acceptable design criteria. More stringent requirements based on specific project conditions may be imposed at the discretion of Public Works and Utilities Department.

City of San Carlos Green Infrastructure Plan

Adopted in 2019, the Green Infrastructure Plan describes how the City will, over time, transition its existing "gray" (i.e., traditional) infrastructure to "green" infrastructure. Green infrastructure uses vegetation, soil, and other elements to capture, treat, infiltrate and slow urban runoff. GI measures could include stormwater planters, rain gardens, tree wells, pervious pavement, infiltration systems, and green roofs.

3.19.1.2 *Existing Conditions*

Water Service

Water service in San Carlos is provided by Cal Water Mid-Peninsula District and MPWD, as shown on Figure 3.19-1, the large majority of the Plan area is served by MPWD.

Cal Water Mid-Peninsula District

Cal Water Mid-Peninsula District purchases water from the SFPUC. The main source of water is the Hetch Hetchy reservoir located in the Sierra Nevada mountains. Cal Water's Individual Supply Guarantee (ISG) from the SFPUC is 35.68 million gallons per day (MGD) (39,993 acre-feet per year; [AFY]), which is shared among its Bear Gulch, Mid-Peninsula, and South San Francisco Districts.[119] Cal Water purchased an average of 29,38 MGD in 2020 and is projected to purchase 30.35 MGD in 2045, which is less than the ISG of 35.68 MGD.[i120] Cal Water's total projected water demand is expected to be 35,869 AFY by 2045.[121] The increase in water demand over a 25-year period is minimal, because Cal Water accounts for both active and passive water conservation measures in their future projections. Cal Water predicts that there will be sufficient water supplies to meet demands through 2045 during normal years.[122] However, there could be a shortage of water supplies in single dry and multiple dry years, if the Bay Delta Plan Amendment is implemented, leading to a reduction in allocations of water from SFPUC. As stated in the 2020 UWMP, if the Bay Delta Plan Amendment is not implemented, SFPUC would be able to supply 100 percent of the projected RWS demands through 2040 during normal, single dry, and multiple dry years. Cal Water's Water Shortage Contingency Plan (WSCP) includes measures that would be implemented in response to water shortages caused by drought or supply interruptions.

The Cal Water San Carlos system has 383 miles of pipeline, 35 storage tanks, and 54 booster pumps.[123]

[119] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report.* January 2025.
[120] Ibid.
[121] Ibid.
[122] Ibid.
[123] Ibid.

Mid-Peninsula Water District

MPWD purchases its entire water supply from the SFPUC, whose main source of water is surface water from the Hetch Hetchy Watershed in the Sierra Nevada mountains. The MPWD has a total of 20 pump stations, 11 water tanks, 13 regulating valves, 813 hydrants and 94 miles of water mains.[124] MPWD mainly serves the City of Belmont and a small portion of the City of San Carlos, although MPWD serves the large majority of the Plan area as shown on Figure 3.19-1.

MPWD's total ISG is 3.891 MGD.[125] With implementation of the Bay Delta Plan Amendment, MPWD predicts a water supply shortage in single- and multiple-dry year scenarios. As stated in the 2020 UWMP, if the Bay Delta Plan Amendment is not implemented, SFPUC would be able to supply 100 percent of the projected RWS demands through 2045 during normal, single dry, and multiple dry years. Responses to water shortages are addressed in MPWD's WSCP, which provides direction on specific actions to be taken by staff and customers in response to increasingly severe water supply shortage conditions. Within the plan, six water shortage levels are identified along with the shortage response actions.

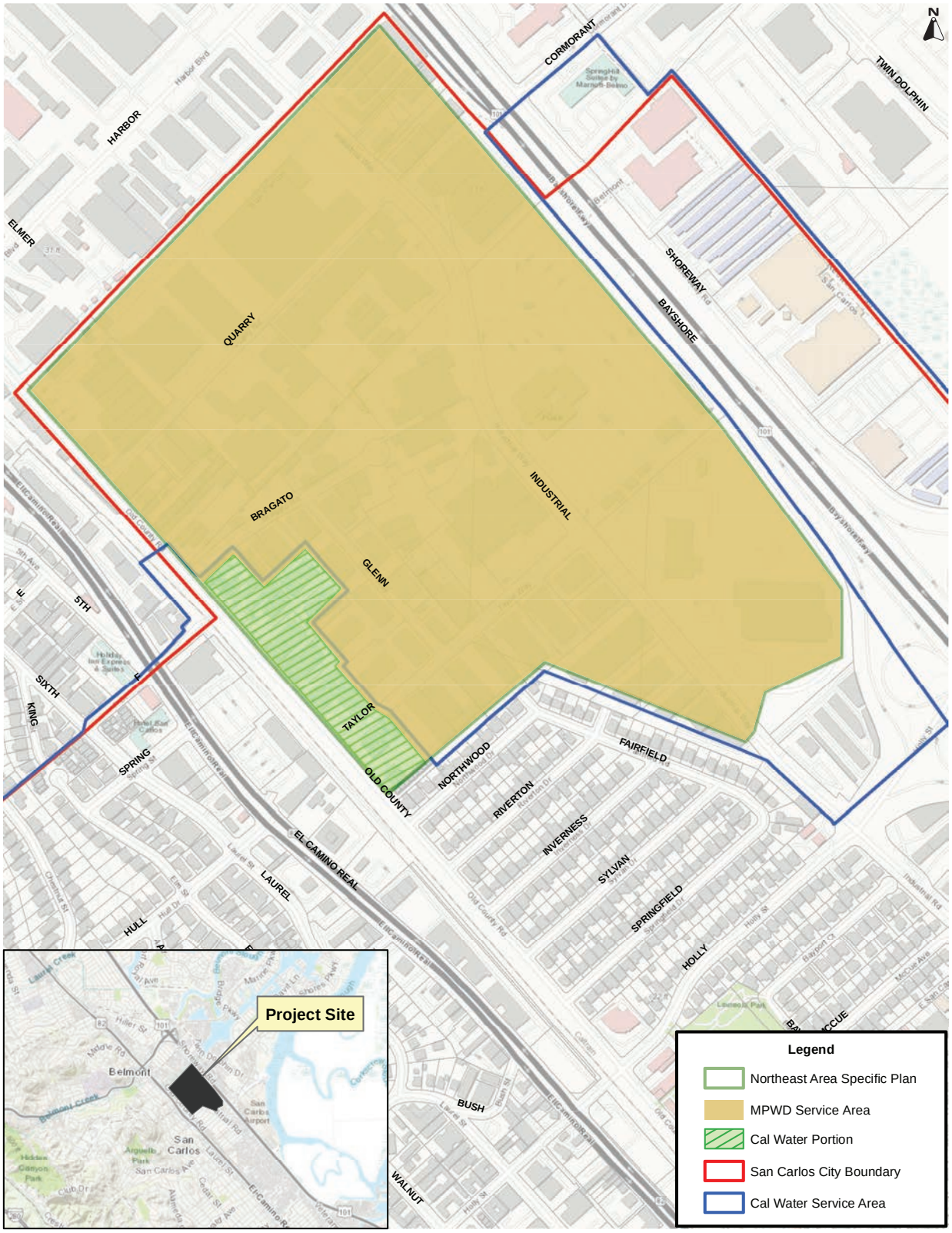
Sanitary Sewer/Wastewater Treatment

The City of San Carlos owns and operates a sanitary sewer collection system consisting of approximately 104 miles of sewer pipelines and 6 sewer lift stations.[126] The majority of the system is a gravity system that consists mainly of pipe diameters that range from five inches to 36 inches, with the majority of the system being six-inch pipes (70 percent). Most of the system was constructed in the 1940s and 1950s with the oldest portions of the system dating back to the 1920s. The primary pipe material is vitrified clay pipe, with plastic pipe (HDPE or PVC) used in newer sewer construction and rehabilitation. The system also includes approximately 11,000 private sewer laterals that are maintained by the property owners. This system is maintained by the City's Public Works Department, and the wastewater flows are conveyed to the Silicon Valley Clean Water (SVCW) Wastewater Treatment Plant (WWTP) located adjacent to the bay in Redwood Shores.

The City's sewer system is subject to infiltration and inflow with groundwater and stormwater entering the collection system during storm events and resulting in high peak flows during wet weather events. As a result, sanitary sewer overflows (SSOs) have occurred in the past. In 2010, the City entered into a Consent Decree with the San Franciso Baykeeper, which requires the City to implement a number of measures targeted at reducing SSOs.

The City plans to upgrade the aging infrastructure as outlined in the Sewer System Management Plan through projects identified in their Capital Improvement Program.[127]

[124] Ibid.
[125] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report*. January 2025.
[126] Ibid.
[127] Ibid.



WATER SERVICE AREA BOUNDARIES | FIGURE 3.19-1

All collected wastewater is conveyed to the San Carlos Pump Station, which is owned and operated by SVCW. It is then pumped to the SVCW WWTP located in the City of Redwood City. The existing volume of wastewater collected by the City and treated at the SVCW facility is approximately 2.85 MGD.[128] The design capacity for the SVCW WWTP is 29 MGD (dry weather flow), and the total of all wastewater flows to the SVCW in 2020 was 12.6 MGD.[129] SVCW's projections estimate that the total wastewater flow in 2040 will be 17.9 MGD.[130] This is still well below its permitted capacity.

Storm Drainage

The City of San Carlos maintains all stormwater facilities within the city. Stormwater runoff in the City of San Carlos is conveyed to San Francisco Bay via a network of 56 miles of storm drains, creeks and drainage channels, and three pump stations.[131] The drainage pipes range in size between four-inch to 72-inch diameter. San Carlos is responsible for maintenance of culverts under roadways and creek segments with easements. Inaccessible creek areas and upstream reaches in the hills are generally on private property and respective property owners are responsible for maintenance. The City addresses flooding constraints through their Capital Improvement Program, which prioritizes improvement projects for the drainage system.

The City's drainage system is divided into five watersheds: Cordilleras Creek, Brittan Creek, Pulgas Creek, Lower Pulgas Creek and Belmont Creek. The Plan area is located within the Belmont Creek watershed, with Belmont Creek forming the northern boundary of the Plan area.

Solid Waste

Recology San Mateo County (Recology) provides recycling, compost, and garbage collection in San Carlos and San Mateo County. All waste is transported to the Shoreway Environmental Center in the City of San Carlos, which consists of a transfer station, a materials recovery facility in which recyclable materials are retrieved from the waste stream and shipped to recyclers, and a public recycling facility. The facility also accepts construction and demolition debris. The Shoreway Environmental Center has a maximum permitted throughput of 3,000 tons per day.[132]

South Bay Recycling (SBR) is the contractor hired by RethinkWaste to operate the Shoreway Environmental Center. SBR is responsible for the marketing and selling of recyclable materials to domestic and overseas markets, transporting loads of organic waste to Blossom Valley Organics in Vernalis and Newby Island in San Jose, transporting garbage to the Ox Mountain Landfill in Half Moon Bay, and delivering construction and demolition debris to Zanker Recycling in San Jose. The majority of the solid waste generated in San Carlos is transported to Ox Mountain Landfill. The landfill has a daily maximum throughput of 3,598 tons per day and a remaining capacity of 22

[128] Ibid.
[129] Ibid.
[130] Ibid.
[131] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report*. January 2025.
[132] Ibid.

million cubic yards, and it is expected to reach capacity in 2034.[133] The landfill is estimated to have a residual disposal capacity of 1,790 tons per day.[134]

For 2022, the target disposal rates for San Carlos were 7.5 pounds per day (ppd) per resident and 14.4 ppd per employee. The actual disposal rates in 2022were 6.8 ppd per resident and 10.7 ppd per employee, which are below target rates and thus are consistent with AB 939.[135]

Electricity, Natural Gas, and Telecommunications

Electricity and natural gas would be provided to the project site by Peninsula Clean Energy (PCE) and PG&E, respectively. PCE is San Mateo County's Community Choice Aggregate (CCA), a community-controlled, not-for-profit joint powers agency. PCE procures renewable sources of electricity throughout San Mateo County, while PG&E manages and maintains the electrical infrastructure used to supply consumers with electricity.

3.19.2 Impact Discussion

For the purpose of determining the significance of the project's impact on utilities and service systems, would the project:

1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

[133] Ibid.
[134] Ibid.
[135] Ibid.

3.19.2.1 *Project Impacts*

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

Water

Within the MPWD service area, it is estimated that the total net new demand from the Plan would be 231 million gallons (MG) annually, or 710 AFY, by 2045. It is estimated that the total net new demand from the Plan within Cal Water's service area would be 41 AFY by 2045. The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not result in the need to construct additional water supply or distribution systems, since most of the new development would be infill projects that are replacing existing buildings with existing water demand and water distribution systems. Further, the 2045 General Plan Reset EIR determined that the Harry Tracy Water Treatment Plant (HTWTP)[136] has the capability of supplying treated water to all of its wholesale and retail customers under existing and future conditions and no new water treatment facilities are required. Consistent with General Plan Action ESPS-3.12, new development would need to be evaluated on a project-by-project basis to determine whether sufficient flow and pressure are available in the water distribution system to meet the demands of the development. Potential environmental impacts could result from construction and operation of these improvements; however, such impacts would be project-specific and cannot be identified and evaluated at the Specific Plan stage. Any new or expanded local water distribution facilities would reviewed in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated.

Compliance with the City's requirements for new construction and implementation of the General Plan goals, policies, and actions would ensure that future development under the Plan would result in less-than-significant impacts with respect to the need for new and/or expanded water facilities.

Wastewater

Wastewater demand for the Plan is estimated to be approximately 606,993 gallons per day (gpd), or 0.61 MGD. As discussed in Section 3.19.1.2 Existing Conditions, SVCW's WWTP estimated wastewater flow in 2040 is well below its permitted capacity. The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not require the construction or expansion of the SVCW's WWTP.

[136] The HTWTP is owned and operated by SFPUC. The HTWTP was recently upgraded and features five new filters, three new ozone generators, and a new seismically resistant 11.5-million-gallon treated water reservoir. The facility now has the capacity to provide 140 MGD for 60 days within 24 hours of a major earthquake.

The City's SSMP identified the following sewer lines within the Plan that need repairs or replacement:

- A portion of sewer main along Industrial Road, needs localized repairs
- A portion of sewer main along Quarry Road needs localized repairs
- A portion of sewer main along Old County Road needs localized repairs
- A portion of sewer main along Quarry Road needs replacement

In accordance with the SSMP, future development projects that discharge to undersized sanitary sewer mains would be required to upsize those mains, accordingly. Potential environmental impacts could result from construction and operation of these improvements; however, such impacts would be project-specific. Any new or expanded wastewater conveyance facilities would be undertaken by the City and undergo environmental review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated.

Compliance with the City's requirements for new construction and implementation of the General Plan goals, policies, and actions would ensure that future development under the Plan would result in less-than-significant impacts with respect to the need for new and/or expanded wastewater facilities.

Storm Drain System

Under existing conditions, current land uses in the Plan are mostly light industrial, research and development, and warehousing type uses. Implementation of the Plan would result in new multi-family residential uses and non-residential uses. As discussed in Section 2.3.5 of this EIR, the Plan would require 15 percent open space dedication for all new development on properties greater than one acre. Further, all new residential development would be required to comply with SCMC Section 17.32.030 and provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere. The Plan would include green stormwater infrastructure improvements along all roadways. Therefore, buildout under the Plan would reduce impervious surfaces.

Future redevelopment projects that create or replace 5,000 square feet or more of impervious surface would be subject to Provision C.3 of the MRP, which requires implementation of stormwater treatment measures that would collect and treat stormwater runoff from all on-site impervious areas prior to discharge into the City's storm drain system. This would minimize the amount of stormwater runoff from future development in the Plan. The 2045 General Plan EIR concluded that compliance with Provision C.3 of the MRP would serve to minimize any potential impacts to the City's storm drain system.

Electricity, Natural Gas, and Telecommunications

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the proposed project) would not require or result in the relocation or construction of new or expanded

electric power, natural gas, or telecommunications facilities and impacts would be less than significant.

Future development under the Plan would coordinate with the appropriate electric power, natural gas, and telecommunication providers, on providing service to the site. Existing utility lines would be utilized by development under the Plan for electric power, natural gas, and telecommunications services. Connecting to the energy and communications grid would require trenching on the site, which would not require substantial excavation and would result in minimal impacts. Future development projects would be required to detail the exact locations for all utility connections and utility plans would be subject to review by the City.

As documented above, the Plan would not result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. **(Less than Significant Impact)**

b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As discussed in Section 3.19.1.2 Existing Conditions, water service in the Plan is provided by both Cal Water Mid-Peninsula District and MPWD, with the large majority of the Plan area served by MPWD as shown on Figure 3.19-1. The Plan consists of approximately 4,508,000 gross square feet of new non-residential development and 1,890,000 gross sq ft of new residential development (approximately 1,890 multi-family residential dwelling units, assuming 1,000 square feet average). The water service breakdown for buildout under the Plan is summarized in Table 3.19-1 below.

Table 3.19-1: Water Service Area for Northeast Area Specific Plan Buildout

	Cal Water Mid-Peninsula District	Mid-Peninsula Water District	Total
Non-Residential (square feet)	26,229	4,481,818	4,508,047
Residential (dwelling units)	361	1,529	1,890

Pursuant to SB 610, a WSA was prepared by each of the respective water suppliers and summarized below.

Cal Water Mid-Peninsula District

The portion of the Plan area within Cal Water's existing service area has historically been used for mixed commercial and retail use. Historical water use has ranged between 2.5 AFY and 3.5 AFY between 2019 and 2023, and averaged 2.8 AFY. It is estimated that the total net new demand from the Plan within Cal Water's service area would be 41 AFY by 2045, as shown in Table 3.19-2.

Table 3.19-2: Projected Water Demand within Cal Water's Service Area (AFY)

2025	2030	2035	2040	2045
0	15	24	32	41

Source: Cal Water Service Mid-Peninsula District. *Water Supply Assessment for the City of San Carlos Northeast Area Specific Plan*. January 2025.

Total water demand for the District averaged 13,733 AFY from 2019 through 2023. The 2020 UWMP estimates that water demand within Cal Water's service area is projected to increase to 15,279 AFY by 2045, an increase of 13 percent over the 2019-2023 average. Total water demand is estimated to incrementally increase to 15,366 AFY by 2045, inclusive of the Plan and other planned developments. The WSA concluded that Cal Water has sufficient water supplies to meet all projected water demand during normal hydrologic years. In the event the Bay-Delta Plan Amendment is implemented, shortfalls of up to 53 percent are possible in drought periods. However, if drought conditions should arise, Cal Water will meet its demands through the implementation of its WSCP. In addition, Cal Water, through local and regional efforts, is striving to increase its water supply portfolio. Therefore, the WSA concludes supplies are sufficient to meet projected future demands, inclusive of the Plan. The shortfalls that are currently projected during dry years will be addressed through planned implementation of the District's WSCP.

Mid-Peninsula Water District

Existing water demand for the Plan within MPWD's service area has ranged from 15 million gallons per year (MGY) to 28 MGY and averaged 20 MGY, or 61.5 AFY.[137] It is estimated that the total net new demand from the Plan would be 711 AF by 2045, as shown in Table 3.19-3.

Table 3.19-3: Projected Water Demand within MPWD's Service Area (AFY)

2025	2030	2035	2040	2045
80	250	394	557	711

Source: Mid-Peninsula Water District. Water Supply Assessment for the City of San Carlos' Northeast Area Specific Plan. February 2025.

Water use within the MPWD service area has significantly declined since 2000. The total water use within the MPWD service area averaged 2,731 AF from 2019-2023, which represents 63 percent of MPWD's ISG of 4,358 AFY. MPWD's 2020 UWMP projected MPWD water demand to be 3,281 AF by 2045. This demand does not account for the Plan and other known developments since 2020 UWMP development. Taking into account the 2020 UWMP projected demands and additive demands from the development that would be enabled by the Plan and other known developments[138] that are outside of the anticipated growth of the 2020 UWMP demand

[137] For purposes of this discussion, water demand values have been converted from MG to AF to provide a comparison to the water demand within Cal Water's service area.
[138] Includes Harbor Industrial Area Specific Plan.

projections, total demands for the District are projected to be up to 4,708 AF by 2045, representing 107.4 percent of the MPWD's total ISG of 4,358 AF.

The WSA concludes that MPWD has sufficient supplies under normal hydrologic years to meet anticipated demands for MPWD and all other known developments through 2035, but anticipates up to a 1.4 percent shortfall in 2040 and a 7.4 percent shortfall in 2045. This estimated shortfall may be lower due to a number of factors, and if such a shortfall is realized, the shortfall can be addressed through implementation of the District's WSCP. There is a significant level of uncertainty as to how and when the Bay-Delta Plan Amendment would be implemented and how it would affect the supply reliability of the SFPUC RWS. This uncertainty translates to a wide range of potential dry year supply availability scenarios, including large shortfalls. However, MPWD is pursuing the development of additional water supplies to improve reliability. Therefore, MPWD's WSA finds that the total projected water supplies available during normal, single dry, and multiple dry years over a 20-year protection will meet the projected water demands associated with the Plan, in addition to MPWD's existing and planned future uses and other known developments, with implementation of its WSCP during water shortages. MPWD is currently undergoing an updated study of its projected demands through 2050. These updated demand projections will be used as part of the District's 2025 UWMP, which is anticipated to be completed in summer of 2026.

Summary

As discussed above, both Cal Water Mid-Peninsula District and MPWD are expected to have sufficient water supplies to meet demand under normal conditions with implementation of the Plan. However, both water purveyors project water shortages during single- and multiple-dry year conditions, assuming implementation of the Bay Delta Plan Amendment and SFPUC supply restrictions.

Future development projects would be required to implement the water-efficient requirements specified in the CALGreen and California Plumbing Codes and the WELO requirements for water efficient landscaping. Future development projects within the Plan that meet the size threshold for preparing a WSA, or that require a Water Service Agreement with the District, would be individually assessed for their expected water demands on the system in relation to available water supply at the time.

As discussed in Section 2.4.4.3, new development in the Plan would be required to incorporate sustainable water use options, such as utilizing recycled water (if available) or on-site alternative water sources, such as graywater re-use systems, rainwater harvesting and re-use, or blackwater treatment and re-use systems. At the time of issuance of a certificate of occupancy for any building in a new development project, the water infrastructure associated with such building shall include dual plumbing for potable and recycled water, with separate pipelines composed of appropriate material to accommodate recycled water. If a recycled water source and associated off-site infrastructure becomes available to connect and deliver recycled water for use at the property, the developer shall reasonably promptly connect the project's plumbing infrastructure to such source

and associated off-site infrastructure, provided the necessary off-site infrastructure is available at the public street frontage of the property.

Implementation of Cal Water and MPWD's WSCPs, compliance with WSA requirements, compliance with existing water conservation regulations, and implementation of the General Plan goals, policies, and actions would reduce water demand with respect to water supplies. In addition, Cal Water, MPWD, and SFPUC plan to implement alternative water supply programs by 2045. The Bay Delta Plan Amendment may not be enacted in its current structure, making more water available than anticipated in the most recent UWMPs. Therefore, there would be sufficient water supply available to serve buildout of the Plan. **(Less than Significant Impact)**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Future development within the buildout horizon of the proposed Plan would result in an increase in wastewater with a population increase of 3,611 residents and 4,508,000 new square feet of non-residential land use (or 9,794 new employees) (refer to Section 3.14 Population and Housing). Wastewater generated by the proposed project would be collected by the City's sanitary sewer system and conveyed to the SVCW WWTP. The estimated wastewater generation from the Plan is summarized in Table 3.19-4 below.

Table 3.19-4: Projected Wastewater Generation Increase

Category	Net Change (residents or square feet)	Wastewater Use Factor[1]	Increase in Wastewater Generation (gpd)	Increase in Wastewater Generation (MGD)
Residential	3,611	47 gpcd	169,717	0.169
Non-Residential	4,508,000	0.097 gpd/square feet	437,276	0.437
Total			**606,993**	**0.61**

Notes: gpcd = gallons per capita per day

[1] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report*. January 2025.

The total increase in wastewater generation is estimated to be approximately 0.61 MGD. The SVCW WWTP has a design capacity of 29 MGD and a projected total wastewater flow of 17.9 MGD in 2040. Therefore, there is a residual projected treatment capacity of 11.1 MGD. The 2045 General Plan Reset EIR concluded that the increase in wastewater generation from buildout of the General Plan (which accounted for the proposed project) is well within the residual capacity of the SVCW WWTP. In addition, per capita wastewater flow rates are expected to decline with water conservation efforts. Therefore, the SVCW WWTP would be able to accommodate future wastewater flows from the City and other contributors of wastewater flows to the SVCW WWTP. **(Less than Significant Impact)**

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Implementation of the Plan is estimated to generate approximately 64.5 tons of solid waste per day, or 23,543 tons per year, as summarized in Table 3.19-5 below.

Table 3.19-5: Projected Solid Waste Generation

Category	Net Change (residents or jobs)	Solid Waste Generation Rate (ppd)[1]	Increase in Solid Waste (tons/day)	Increase in Solid Waste (tons/year)
Residents	3,611	6.8	12.3	4,490
Jobs	9,794	10.7	52.2	19,053
Total			**64.5**	**23,543**

[1] City of San Carlos. *2045 General Plan Reset Draft Environmental Impact Report*. January 2025.

The Plan's increase of 64.5 tons per day represents approximately three percent of the current residual daily capacity (1,790 tons per day) at Ox Landfill.

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the proposed Plan) would not generate solid waste in excess of the capacity of the landfills that serve the City. Furthermore, all new developments under the Plan would be required to comply with CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multifamily residential land uses. Therefore, implementation of the proposed project would not generate solid waste in excess of State and local standards, or in excess of the capacity of the landfills, or otherwise impair the attainment of solid waste reduction goals and the impact is less than significant. **(Less than Significant Impact)**

e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

As discussed under checklist question d), future development under the Plan would comply with state and local regulations related to solid waste reduction. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multifamily residential land uses. Further, all new developments are required to comply with CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be

recycled and/or salvaged for reuse. Thus, the Plan would comply with federal, state, and local solid waste statutes and regulations. **(Less than Significant Impact)**

3.19.2.2 *Cumulative Impacts*

Would the project result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact?

Relocation or Construction of New or Expanded Facilities

Water Facilities

The geographic area for cumulative water system impacts is the area serviced by the same water lines as the sites in the Plan, as well as the service areas for the two water retailers serving the Plan. Cumulative projects would be required to demonstrate that adequate water quantity, quality and distribution could be provided. Potential environmental impacts could result from construction and operation of these improvements; however, such impacts would be project-specific. Any new or expanded local water distribution facilities would be reviewed in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated to the extent possible.

Wastewater

The geographic area for cumulative wastewater system impacts is the area serviced by the same wastewater lines as the sites in the Plan, as well as the service area for the SVCW WWTP. If insufficient capacity exists to serve future cumulative development, individual projects (including under the Plan) would need to determine the remaining capacity and may be required to upsize sewer mains as part of the public improvements for their project, which could extend beyond the immediate vicinity of the project frontage. Any sewer infrastructure improvements required to serve specific development sites would require permits from the City and review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated to the extent possible. The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the Plan) would not, in combination with other cumulative growth within the SVCW service area, exceed the treatment capacity at the SVCW WWTP, nor result in the need to construct additional water supply or distribution systems, since most of the new development would be infill projects that are replacing existing buildings with existing wastewater demand and wastewater systems. For this reason, the project would not contribute to a significant cumulative impact to the wastewater system.

Storm Drainage

The geographic area for cumulative storm drain system impacts are the areas upstream and downstream of the Plan. Future cumulative development (projects that create or replace 5,000 square feet or more of impervious surface) would be subject to Provision C.3 of the MRP, which requires implementation of stormwater treatment measures that would collect and treat

stormwater runoff from all onsite impervious areas prior to discharge into the City's storm drain system. The 2045 General Plan EIR concluded that compliance with Provision C.3 of the MRP would serve to minimize any potential impacts to the City's storm drain system. As noted previously, the Plan area is largely developed and buildout under the Plan would result in a reduction of impervious surfaces. Therefore, there is little potential for an increase in rate or volume of surface runoff. Therefore, the project would not contribute to a significant cumulative impact to storm drainage facilities.

Electric Power, Natural Gas, and Telecommunications

Future cumulative development would coordinate with the appropriate electric power, natural gas, and telecommunication providers on providing service to the site. Existing utility lines would be utilized by development under the Plan for electric power, natural gas, and telecommunications services. Connecting to the energy and communications grid would require trenching on the site, which would not require substantial excavation and would result in minimal impacts. Future development projects would be required to detail the exact locations for all utility connections and utility plans would be subject to review by the City. The proposed project would not contribute to a cumulatively considerable impact on electric power, natural gas, or telecommunications utilities.

Water Supply

The geographic area for cumulative water supply is the service area of the respective water suppliers (Cal Water and MPWD). The 2045 General Plan Reset EIR concluded that cumulative water supply impacts would be less than significant through compliance with federal, State, and local regulatory requirements, including City ordinances and General Plan goals, policies, and actions. All new development projects that meet the SB 610 criteria, such as residential projects with more than 500 dwelling units, would be required to be evaluated in WSAs prepared by the respective water retailer, or demonstrate that their demand had been accounted for in a prior WSA. The City and the water purveyors would review such projects for adequacy of water supply and the water purveyors would update the UWMP every five years to ensure that there are adequate water supplies and contingency plans for future residents and customers. All new development under the proposed Plan would require implementing water efficiency and water conservation measures, as per the CALGreen Building Code and the WELO irrigation requirements. Water supply deficits in dry years would be met by implementing the WSCPs and other water conservation efforts. Therefore, the project would not contribute to a significant cumulative impact to water supply.

Wastewater Treatment Capacity

The geographic area for cumulative wastewater treatment impacts is the SVCW WWTP. As discussed under checklist question c), the SVCW WWTP has a residual projected treatment capacity of 11.1 MGD and is expected to meet future growth in its service area. The 2045 General Plan EIR concluded that future development projects would have to pay wastewater capacity charges and property owners are required to pay an annual sewer service charge, which funds continued

improvements to the wastewater collection and treatment system. Therefore, cumulative development would not exceed wastewater collection or treatment capacities.

Solid Waste

The 2045 General Plan Reset EIR concluded that buildout under the General Plan (including the proposed project) would not generate solid waste in excess of the capacity of the landfills that serve the City. In addition, new development would comply with CALGreen, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential construction operations be recycled and/or salvaged for reuse. This would also reduce the volume of solid waste transported to the landfills. Continued compliance with the applicable regulations and an increase in recycling and landfill diversion rates would ensure that solid waste cumulative impacts would be less than significant.

As described above, the Plan would not result in a cumulatively considerable contribution to a significant cumulative utilities and service systems impact. **(Less than Significant Cumulative Impact)**

3.20 Wildfire

3.20.1 Environmental Setting

3.20.1.1 *Regulatory Framework*

State

Fire Hazard Severity Zones

CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

California Fire Code Chapter 47

Chapter 47 of the California Fire Code sets requirements for wildland-urban interface fire areas that increase the ability of buildings to resist the intrusion of flame or burning embers being projected by a vegetation fire, in addition to systematically reducing conflagration losses through the use of performance and prescriptive requirements.

California Public Resources Code Section 4442 through 4431

The California Public Resources Code includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that uses an internal combustion engine; specify requirements for the safe use of gasoline-powered tools on forest-covered land, brush-covered land, or grass-covered land; and specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas. These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period, from April 1 to December 1 (Public Resources Code Section4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain appropriate fire suppression equipment (Public Resources Code Section 4427); and

- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (Public Resources Code Section 4431).

California Code of Regulations Title 14

The California Board of Forestry and Fire Protection has adopted regulations, known as SRA Fire Safe Regulations, which apply basic wildland fire protection standards for building, construction, and development occurring in a SRA. The future design and construction of structures, subdivisions and developments in SRAs are required to provide for the basic emergency access and perimeter wildfire protection measures discussed in Title 14.

San Mateo–Santa Cruz Unit Strategic Fire Plan

CAL FIRE developed the San Mateo–Santa Cruz Unit 2023 Strategic Fire Plan, adopted in 2023, which covers an approximately 894-square-mile area and protects 572,160 acres of the SRA in both San Mateo and Santa Cruz Counties.[139] The goal of this plan is to outline resource needs in the area by creating a list of all the initial attack resources in the unit and expanding these resources in at-risk communities. There is also an education section in the plan that encourages teaching the community at formal events and meetings.

San Mateo County Multi-Jurisdictional Hazard Mitigation Plan

The San Mateo County MJHMP, updated in 2021 in accordance with the federal Disaster Mitigation Action of 2000, provides an assessment of natural hazards in the county and a set of short-term mitigation actions to reduce or eliminate the long-term risk to people and property from these hazards. The San Carlos Jurisdictional Annex of the MJHMP provides an assessment of hazards and vulnerabilities, and a set of mitigation actions for San Carlos specifically while considering the results from the countywide effort. In the context of an MJHMP, mitigation is an action that reduces or eliminates long-term risk to people and property from hazards, wildfire.[140]

San Carlos 2045 General Plan Reset

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating wildfire impacts resulting from planned development within the City including the following:

Policy	Description
ESPS-3.1	Promote and improve, as necessary, inter-jurisdictional fire prevention assessment, planning, and projection; and consultation and communication regarding disaster or emergency plans of San Carlos and Mutual Aid with adjacent agencies including but not limited to San Mateo County, Redwood City, Belmont, and CAL FIRE.

[139] City of San Carlos. *2045 General Plan Reset Draft EIR.* January 2025.
[140] Ibid.

Policy	Description
ESPS-3.3	Ensure adequate Fire Department resources (fire stations, personnel, and equipment) to meet response time standards, keep pace with growth, and provide a high level of service to the community.
ESPS-3.9	Incorporate or require the incorporation of fire safety features in new development and redevelopment.
ESPS-3.10	Require new residential developments to have adequate fire protection and be more wildfire resistant by establishing greenbelt zones for fire-resistant landscaping.
ESPS-3.11	Require new residential development to be designed to reduce wildfire hazard and improve defensibility (e.g., clustering lots, managed greenbelts, water storage, fuel modification zones, and vegetation setbacks).
ESPS-3.14	Provide adequate evacuation routes and access for fire and emergency service vehicles to all San Carlos areas.
ESPS-13.10	Require existing overhead utility lines be placed underground in new development and redevelopment through a phased program of conversion in existing overhead areas.

3.20.1.2 *Existing Conditions*

The Plan area is located within an urban area and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The nearest areas designated Very High Fire Hazard Severity Zones (VHFSZ) by the CAL FIRE are the foothill neighborhoods west of Alameda de las Pulgas, which are over one mile west of the Plan.[141]

3.20.2 Impact Discussion

For the purpose of determining the significance of the project's impact on wildfire, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

[141] City of San Carlos. *2045 General Plan Reset Draft EIR.* Figures 4.18-1. January 2025.

3.20.2.1 *Project Impacts*

As described above in Section 3.20.1.1, the Plan area is located in an urbanized location and is not in or adjacent to a VHFSZ or state responsibility areas. The implementation of the Plan, therefore, would not result in wildfire impacts. **(No Impact)**

3.20.2.2 *Cumulative Impacts*

The implementation of the Plan would not result in wildfire impacts; therefore, the project would not contribute to cumulative wildfire impacts. **(No Cumulative Impact)**

Section 4.0 Growth-Inducing Impacts

Would the project foster or stimulate significant economic or population growth in the surrounding environment?

The CEQA Guidelines require that an EIR identify the likelihood that a proposed project could "foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (Section 15126.2[d]). This section of the EIR is intended to evaluate the impacts of such growth in the surrounding environment.

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement results if a project involves construction of new housing that would result in new residents moving to the area. A project can have indirect growth-inducement potential if it establishes substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it involves a substantial construction effort with substantial short-term employment opportunities and indirectly stimulates the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project could indirectly induce growth if it expands roadway capacity or removes an obstacle to additional growth and development, such as removing a constraint on required public services or utilities (e.g., adding a sewage treatment plant that has capacity to serve demand beyond the associated project).

The Plan is an "infill" project, meaning that the Plan area is within the City's existing boundaries, already served by existing infrastructure, and planned for urban uses. The City of San Carlos certified the 2045 General Plan Reset EIR on May 27, 2025. The development projections in the EIR included citywide buildout capacity through 2045 (including the Plan). The purpose of the Plan is to create a vision, policies, and standards to guide new development within the Plan area in a way that supports existing and new businesses, residents, and the overall community. The Plan anticipates new development and change over an approximate 20-year period, through 2045, and would allow for an increase of 1,890 residential units (no residential units exist within the Plan area currently), as well as an increase in the net new square footage of existing non-residential land uses (4,508,000 square feet) within the Plan area. These development amounts are consistent with the growth allowed under the 2045 General Plan Reset.

There are no undeveloped areas adjacent or in the immediate vicinity of the Plan area and the Plan would not remove any obstacles that would help facilitate additional growth that could significantly affect the physical environment. The Plan does not include the expansion of existing infrastructure that would facilitate growth in the Plan area or other areas of the City. Therefore, the Plan would not result in growth-inducing impacts beyond what was envisioned in the City's 2045 General Plan Reset. **(Less than Significant Impact)**

Section 5.0 Significant and Irreversible Environmental Changes

Pursuant to CEQA Guidelines Section 15126.2(d), an EIR must identify significant irreversible environmental changes that would be caused by the proposed project being analyzed. Significant irreversible changes include the 1) irreversible use of nonrenewable resources, 2) commitment of future generations to similar use, and 3) irreversible damage resulting from environmental accidents associated with the project.

5.1 Irreversible Use of Nonrenewable Resources

Future development under the Plan would require the use of nonrenewable construction material, such as concrete, metals, plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the sites, and construction of the buildings. The operational phases would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the Plan area.

As discussed in Section 3.6 Energy, build out of the Plan would increase consumption of electricity, natural gas, and gasoline. Future development under the Plan would be compliant with California Building Energy Efficiency Standards and CALGreen standards. For these reasons, the Plan would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources.

5.2 Commitment of Future Generations to Similar Use

Future development under the Plan would commit resources to prepare the sites, construction the buildings, and operate the buildings. Future development would occur on in-fill sites that are already developed. Implementation of the Plan would not result in other land use changes in the surrounding area. As discussed previously, the development projections in the 2045 General Plan Reset EIR included citywide buildout capacity through 2045 (including the Plan). As part of the Plan, the General Plan would be amended to include new land use classifications and zoning districts (refer to Section 2.0 Project Information and Description) which would be used to implement the Plan to facilitate the new development assumed for the Plan area in the 2045 General Plan Reset. For these reasons, the Plan would not commit future generations to changes in land use beyond what is accounted for in the adopted 2045 General Plan Reset.

5.3 Irreversible Damage Resulting from Environmental Accidents Associated with the Project

The purpose of the Plan is to create a vision, policies, and standards to guide new development within the Plan area in a way that supports existing and new businesses, residents, and the overall community. The Plan is intended to manage and direct changes in the development patterns and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provision, open space, and community benefits. The Plan does not propose any new or uniquely hazardous uses, and its operation would not be expected to cause environmental accidents that would impact other areas. As discussed in Section 3.9 Hazards and Hazardous Materials, soil, soil vapor, and groundwater within the Plan area is potentially contaminated with petroleum hydrocarbons, metals, VOCs and PCBs. Future development within the Plan could encounter and disturb contaminated soil, soil vapor, and groundwater, and result in adverse effects on construction workers, existing residents and employees, and nearby sensitive receptors. All future development (prior to the issuance of any permits allowing ground-disturbing activities that could encounter contaminated soil, soil vapor, and groundwater) would be required to mitigate hazard exposure through adherence to General Plan policies ESPS-5.3, ESPS-5.5, and ESPS-5.6. Additionally, all dewatering activities, including the dewatering of contaminated groundwater, would be conducted in accordance with the requirements of the RWQCB and the City's Municipal Code, which would ensure that contaminated groundwater is disposed of properly and is not discharged into the storm drain system. Adherence with the aforementioned regulations and processes would ensure that future development under the Plan does not create a significant hazard to the public or environment. In addition, there are no significant geology and soils impacts from implementation of the Plan. Based on the discussion above, future developments proposed under the Plan would not result in irreversible damage that may result from environmental accidents.

Section 6.0 Significant and Unavoidable Impacts

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the Plan is implemented as it is proposed. The following significant and unavoidable impacts have been identified as resulting from the Plan:

- **Impact AIR-1**: Buildout of the Plan would increase daily trips by 203 percent, and increase the service population by 193 percent. Since the rate of increase in population would be exceeded by the rate of increase in daily trips, the Plan would have a significant criteria air pollutant emissions impact.
- **Impact AIR-3:** Buildout of the Plan would result in annual and average daily emissions of ROG and NOx associated with operation of the Plan that would exceed the Bay Area Air District project-level significance thresholds.
- **Impact AIR-**C: Buildout of the Plan would result in a cumulatively considerable net increase of criteria pollutant emissions.
- **Impact GHG-1:** Implementation of the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.
- **Impact GHG-**C: Implementation of the Plan would result in a significant cumulative GHG impact.

7.1.1 Significant Impacts of the Project

As explained above, the CEQA Guidelines Section 15126.6 states that the alternatives analysis in an EIR should be limited to alternatives that are feasible and would avoid or substantially lessen any of the significant effects of the project and achieve most of the basic project objectives. Potentially significant environmental impacts that would result from the proposed Plan are evaluated in Chapter 3.0, Environmental Setting, Impacts, and Mitigation Measures, of this EIR. As discussed throughout this EIR, with implementation of existing General Plan policies, Specific Plan Project Requirements, and standard requirements, most of the potentially significant impacts resulting from the project would be reduced to a less-than-significant level. The following impacts listed below and summarized in Section 6.0 Significant and Unavoidable Impacts would remain significant and unavoidable, and the alternatives evaluated in this EIR have been selected because they are anticipated to reduce and/or eliminate one or more of the significant impacts associated with the project.

- **Impact AIR-1:** Buildout of the Plan would increase daily trips by 203 percent, and increase the service population by 193 percent. Since the rate of increase in population would be exceeded by the rate of increase in daily trips, the Plan would have a significant criteria air pollutant emissions impact.
- **Impact AIR-3:** Buildout of the Plan would result in annual and average daily emissions of ROG and NOx associated with operation of the Plan that would exceed the Bay Area Air District project-level significance thresholds.
- **Impact AIR-C:** Buildout of the Plan would result in a cumulatively considerable net increase of criteria pollutant emissions.
- **Impact GHG-1:** Implementation of the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.
- **Impact GHG-C:** Implementation of the Plan would result in a significant cumulative GHG impact.

7.1.2 Project Objectives

While CEQA does not require that alternatives must be capable of meeting all of the project objectives, their ability to meet most of the basic objectives is considered relevant to their consideration. As identified in Section 2.4 Project Objectives, the objectives for the project are as follows:

1. Celebrate and maintain the area's industrial legacy by continuing to allow for light industrial, research and development, including offices, in a way that supports both existing and new businesses within the overall district and supports economic development and fiscal stability.

2. Introduce housing in the district to balance the needs of living wage jobs, while accommodating future population growth in San Carlos to meet housing needs as part of future Housing Element cycles.

3. Support district wide access for all users, employees – future residents – and visitors alike, by providing multi-modal infrastructure that supports walkability, bikeability, public transportation, and vehicular transportation.

4. Address flooding and sea level rise through a robust resilience framework including improvements to Belmont Creek and green stormwater infrastructure.

5. Plan for the anticipated 4.5 million square feet of net new non-residential development through development standards and a community benefits framework that leverages public open space, street and trail improvements, and financial contributions that deliver tangible amenities that serve the district and broader community.

7.1.3 Feasibility of Alternatives

CEQA, the CEQA Guidelines, and case law interpreting CEQA and the CEQA Guidelines have found that feasibility can be based on a wide range of factors and influences. The CEQA Guidelines state that such factors can include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can "reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1])."

7.2 Project Alternatives

7.2.1 Project Alternatives Considered But Rejected from Further Analysis

7.2.1.1 *Location Alternative*

In considering an alternative location in an EIR, the CEQA Guidelines advise that the key question is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location".[142]

Location alternatives are frequently considered to reduce the site-specific impacts of a project. A Location Alternative would need to be at least of comparable size and have the potential to accommodate similar uses as the Plan (approximately 145 acres) in the City of San Carlos. There are no alternative locations that are of similar size to the Plan area within the City. In addition, the

[142] CEQA Guidelines Section 15126.6(f)(2)(A)

intent of the Plan is to manage and direct changes in the development patterns within the Plan area and guide present and future land uses, zoning changes, economic development, urban design, infrastructure, transportation circulation management and mobility, service provisions, and community benefits. Therefore, it would be infeasible to evaluate an alternative location in the City. The Plan must, by its nature, guide future development located in the Plan area. Accordingly, to evaluate another location for the Plan would not be meaningful for the purposes of making a decision about the proposed project. Therefore, a location alternative is not evaluated further in this EIR.

7.2.1.2 *All Employment Alternative*

Under the current General Plan, housing is a prohibited use within the Plan. The All Employment Alternative would not reclassify portions of the Plan to Mixed-Use, 75-90 du/acre and would remain Planned Industrial. It is assumed that if this area remained Planned Industrial, it would be developed with up to 5,293,642 square feet of employment uses.[143] None of the significant impacts of the project are directly related to the inclusion of housing in the Plan. Under this alternative, the scale of development would be similar to the Plan. Therefore, it is anticipated that this alternative would not avoid or substantially lessen and of the Plan's significant impacts. This alternative would not meet the project's fundamental objectives to introduce housing in the district to accommodate future population growth in San Carlos, some of which planned housing within the Plan area is intended to satisfy some of the City's mandated housing during future RHNA cycles. Therefore, since this alternative does not meet the basic objectives of the project and would not reduce significant impacts, this alternative was not evaluated further.

7.2.1.3 *GHG Reduction Alternative*

This EIR does not evaluate an alternative that would reduce the Plan's significant GHG impact. Consistent with the 2045 General Plan Reset EIR, development under the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal for 2045 under AB 1279. The City has committed to implementing Mitigation Measure GHG-1, which would ensure that the City prepares a CMAP update to chart a trajectory to achieve the long-term year 2045 GHG reduction goal and State's carbon neutrality goal set by AB 1279. It is unclear at this time if carbon neutrality can be achieved by 2045, or what form or amount of development could occur within the Plan area that would achieve carbon neutrality. Therefore, this alternative was not evaluated further.

7.2.2 Alternatives Selected

The discussion of the alternatives selected is provided below and a summary of the development assumed under the alternatives compared to the Plan is summarized in Table 7.2-1 below.

[143] Assumes that the areas that would be developed under the Plan with mixed-use residential would be developed with 785,642 square feet of non-residential uses.

Table 7.2-1: Development Summary of Project and Alternatives Selected

	Net New Non-Residential (square footage)	Net New Residential (units)
Plan	4,508,000	1,890
No Project, No New Development Alternative	0	0
No Project, Existing Plans Alternative	874,000	0
Reduced Criteria Pollutant Emissions Alternative	3,606,400	1,512
Enhanced TDM Alternative	4,508,000	1,890

7.2.2.1 *No Project Alternatives*

The CEQA Guidelines specifically require consideration of a "No Project" Alternative. The purpose of including a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (Section 15126.6[e][3][B])."

The Plan area is currently developed with 2,617,497 square feet of light industrial, office, and institutional uses. The Plan area currently has no housing units and residential uses are not allowed under the existing General Plan land uses and zoning districts.

The EIR evaluates two No Project Alternatives: (1) a No Project, No New Development Alternative and (2) a No Project, Existing Plans Alternative. Under the first, the No Project/No Development Alternative, the Plan area would remain as it is today (i.e., 2,617,497 square feet of light industrial, office, and institutional uses). The No Project, Existing Plans Alternative, assumes what would be reasonably expected to occur in the foreseeable future if the Plan were not approved, based on current plans, i.e. the existing adopted General Plan.

No Project, No New Development Alternative

<u>Comparison of Environmental Impacts</u>

A summary comparison of the environmental impacts of the Plan and the two No Project Alternatives is provided in Table 7.2-2 below.

Because the No Project, No New Development Alternative would not result in changes to existing conditions, this alternative would avoid all of the significant environmental impacts of the Plan. However, under this alternative, many of the beneficial environmental resiliency standards that

would be required under the Plan would not be implemented. For example, the existing setbacks to Belmont Creek would remain as they currently are. Further, since no redevelopment would occur under this alternative, new publicly accessible open space would not be established.

Relationship to Project Objectives

The No Project, No New Development Alternative would not meet any of the project's objectives. Under this alternative, conditions would remain as they currently are. No housing would be introduced in the Plan area and multi-modal improvements would not be implemented. Further, opportunities to address flooding and sea level rise through the implementation of resiliency standards and improvements to Belmont Creek would not be accomplished.

Conclusion

The No Project, No New Development Alternative would avoid all the environmental impacts of the Plan. However, this alternative would not accomplish any of the Plan's environmental benefits and it would not meet any of the Plan's objectives.

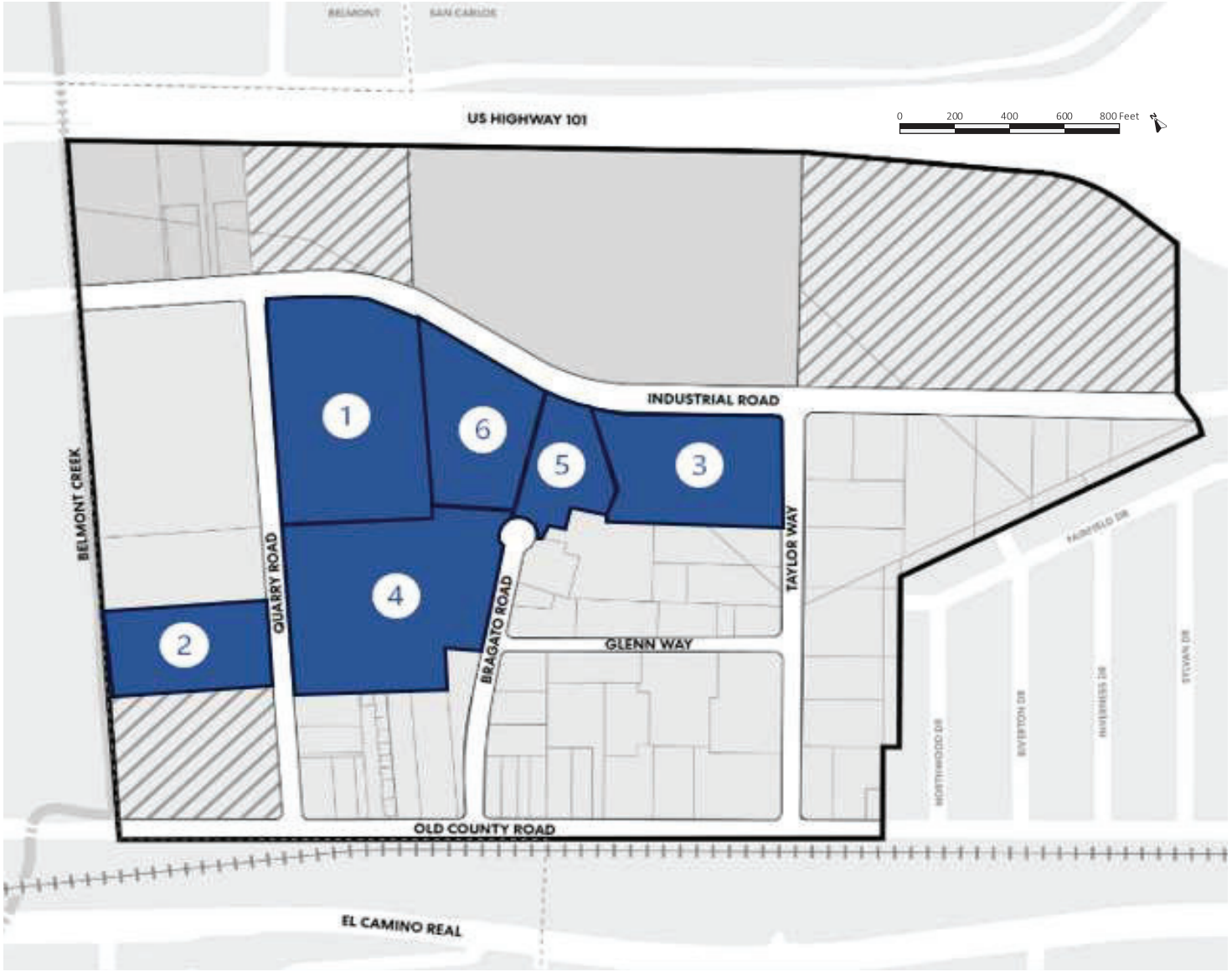
No Project, Existing Plans Alternatives

Comparison of Environmental Impacts

Under the No Project Alternative, Existing Plans Alternative, it is assumed that some redevelopment would occur in the Plan area. While the 2045 General Plan Reset Final EIR considered buildout projections that included the anticipated growth of the Plan, the City did not adopt land use changes within the Plan. Therefore, any redevelopment under this alternative would occur in accordance with the existing land use and zoning requirements (refer to Section 2.2.1 of this EIR), which would allow up to 874,000 square feet of net new non-residential uses. The City anticipates that redevelopment would occur on approximately 27 acres within the Plan, as shown on Figure 7.2-1, which was based on parcel size, existing land uses, development patterns, and previous inquiries for redevelopment.

Any redevelopment that involves demolition and/or construction would result in similar construction-related impacts associated with migratory and nesting birds, construction noise, and construction air quality impacts. It is anticipated that under this alternative, the significant NOx and ROG impacts disclosed in Impact AIR-3 would be reduced to less than significant since the alternative would reduce the non-residential development by approximately 80 percent. All other significant and unavoidable impacts of the Plan would continue to result (i.e. rate of trip growth[144] and GHG impacts), although at an incrementally reduced levels given the 80 percent reduction in development would lead to reduced criteria pollutants, and reduced GHG emissions from mobile sources.

[144] Assuming an approximately 80 percent reduction in service population and trip rates would result in a rate of population growth that is less than the rate of traffic growth.



POTENTIAL REDEVELOPMENT SITES UNDER NO PROJECT, EXISTING PLANS ALTERNATIVE | FIGURE 7.2-1

Similar to the No Project, No New Development Alternative, many of the beneficial resiliency standards that would be required under the Plan would not be implemented under this alternative. For example, the existing setbacks to Belmont Creek would remain as they currently are, while the Plan would require properties undergoing redevelopment adjacent to the creek to provide 35 foot setbacks from top of bank.

Relationship to Project Objectives

This alternative could partially meet Objective 1. All other objectives would not be met under this alternative.

Conclusion

The No Project, Existing Plans Alternative would lessen some of the environmental impacts of the Plan. However, this alternative would not accomplish most of the Plan's objectives. Similar to the No Project, No New Development Alternative, this alternative would also not accomplish any of the Plan's environmental benefits (i.e., enhanced creek setbacks and flooding improvements).

7.2.2.2 *Reduced Criteria Pollutant Emissions Alternative*

The Reduced Criteria Pollutant Emissions Alternative would reduce NOx emissions by 20 percent in order to reduce emissions below the threshold of 10 tons per year. In order to achieve this level of reduction in emissions, the Plan's development would need to be reduced by an equivalent of 20 percent. Assuming that both the residential and non-residential development included in the Plan were reduced by 20 percent, this equates to 3,606,400 square feet of non-residential and 1,512 residential units. To reduce the Plan's ROG emissions below the threshold of 10 tons per year would require an approximately 80 per reduction in the amount of new development (similar to what would be allowed under the No Project, Existing Plans Alternative, above), and therefore this alternative instead focuses on the more achievable goal of avoiding the Plan's significant NOx impact.

Comparison of Environmental Impacts

Under this alternative, the significant NOx impact disclosed in Impact AIR-3 would be reduced to less than significant, however, while the ROG emissions would also be reduced under this alternative, the magnitude of ROG emissions would exceed the 10 tons per year threshold, and the impact would remain significant and unavoidable. All other significant and unavoidable impacts of the Plan would continue to result (i.e. rate of trip growth and GHG impacts), although at an incrementally reduced levels given the 20 percent reduction in development would lead to reduced criteria pollutants, and reduced GHG emissions from mobile sources. The other potentially significant impacts resulting from the Plan would be similar in magnitude under this alternative and would require compliance with the same General Plan policies, Specific Plan Project Requirements, and standard requirements, to reduce to a less-than-significant level. With 20 percent less development, there would be incrementally reduced roadway noise, and incrementally improved vehicle level of service on area roadways.

Relationship to Project Objectives

This alternative would meet all the project objectives, but not to the same extent since development would be reduced by roughly 20 percent.

Conclusion

The Reduced Criteria Pollutant Emissions Alternative would reduce the Plan's significant NOx emissions disclosed in Impact AIR-3 to less than significant, however, the Plan's ROG emissions, while reduced, would remain significant and unavoidable. All other environmental impacts under this alternative would be similar to the proposed Plan, while project objectives would be largely achieved, although with 20% less development, not to the extent as the Plan.

7.2.2.3 *Enhanced TDM Alternative*

As described in Section 3.3 Air Quality, the rate of growth in the Plan's service population (residents + employees) would be 193 percent, while the rate of growth in trips (and VMT) would be 203 percent, and therefore the Plan would cause a significant air quality impact due to VMT growth outpacing the rate of new Plan residents and employees. This rate of trip (and VMT) growth reflects the requirement that new development under the Plan implement a TDM to achieve a 25 percent trip reduction, with noted exceptions for 100 percent affordable housing, small housing projects, and small non-residential projects. The purpose of the Enhanced TDM Alternative is to further reduce daily trips in the Plan by an additional five percent (i.e. increasing from 25 percent to 30 percent) in order to match the rate of population growth.[145] Having the rate of VMT growth match the rate of service population growth would lead the Plan to comply with the Air District Plan-level threshold, thereby reducing the Plan's significant and unavoidable criteria air pollutant emissions impacts (Impact AIR-1). As discussed in Section 2.3.6 of this EIR, all new development in the Plan would be subject to TDM requirements that would achieve a minimum 25 percent vehicle trip reduction. Under this alternative, future development would need to achieve an additional five percent reduction of daily vehicle trips, for a total reduction of 30 percent vehicle trips. This alternative assumes that the Plan would be redeveloped with the same amount of development as proposed by the Plan, i.e. up to 4,508,00 square feet of non-residential and up to 1,890 residential units.

Comparison of Environmental Impacts

Under this alternative, Impact AIR-1 would be reduced to less than significant. Future development, with exceptions for 100 percent affordable housing, and small housing and small non-residential projects, would be required to reduce daily trips by an additional five percent, for a 30 percent overall trip reduction, which would be consistent with the rate of population growth envisioned under the Plan. All other significant and unavoidable impacts of the Plan would continue to result

[145] Reducing the Plan's gross trips by 30 percent equates to 38,212 trips. The Plan would remove 2,282 existing trips, resulting in a net increase of 35,930 trips. With the 30 percent reduction, the alternative's rate of increase would equal 189 percent over existing, which is less than the 193 rate of increase for population growth.

(i.e. operational criteria pollutants [ROG and NOx] exceeding numeric thresholds, and GHG impacts), although at an incrementally reduced levels given the additional five percent reduction in trips would lead to reduced criteria pollutants, and reduced GHG emissions from mobile sources. The other potentially significant impacts resulting from the Plan would be similar in magnitude under this alternative and would require compliance with the same General Plan policies, Specific Plan Project Requirements, and standard requirements, to reduce to a less-than-significant level. With five percent fewer trips, there would be incrementally reduced roadway noise, and incrementally improved vehicle level of service on area roadways.

Relationship to Project Objectives

This alternative would meet all the project objectives.

Conclusion

The Enhanced TDM Alternative would reduce Impact AIR-1 to less than significant. All other environmental impacts under this alternative would be similar to the proposed Plan. However, the feasibility of all future development under the Plan being able to achieve a 30 percent trip reduction is unknown.

Table 7.2-2: Comparison of Impacts from Alternatives to the Proposed Project

Impacts	Proposed Project	No Project, No New Development Alternative	No Project, Existing Plans Alternative	Reduced Criteria Pollutant Emissions Alternative	Enhanced TDM Alternative
Impact AIR-1: Buildout of the Plan would increase daily trips by 203 percent, and increase the service population by 193 percent. Since the rate of increase in population would be exceeded by the rate of increase in daily trips, the Plan would have a significant criteria air pollutant emissions impact.	SU	**NI**	SU	SU	**LTS**
Impact AIR-2: Future construction under the Plan, if uncontrolled,	LTS	**NI**	LTS	LTS	LTS

Impacts	Proposed Project	No Project, No New Development Alternative	No Project, Existing Plans Alternative	Reduced Criteria Pollutant Emissions Alternative	Enhanced TDM Alternative
could result , in temporary dust and diesel exhaust impact to nearby receptors or exceed acceptable levels for projects. In addition, NOx emissions during grading and soil import/export for large projects may exceed the Bay Area Air District NOx emission thresholds for projects.					
Impact AIR-3: Buildout of the Plan would result in annual and average daily emissions of ROG, NOx, and PM_{10}, and $PM_{2.5}$ associated with operation of the Plan Area would exceed the Bay Area Air District project-level significance thresholds.	SU	**NI**	**LTS**	SU	SU
Impact AIR-C: Buildout of the Plan would result in a cumulatively considerable net increase of criteria pollutant emissions.	SU	**NI**	SU	SU	SU
Impact BIO-1: Future construction activities associated with build out under the Plan could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M

Impacts	Proposed Project	No Project, No New Development Alternative	No Project, Existing Plans Alternative	Reduced Criteria Pollutant Emissions Alternative	Enhanced TDM Alternative
Impact BIO-2: Future demolition activities under the Plan could result in direct physical disturbance of any roosting bats that may be present, possibly resulting in injury or mortality, as well as the loss of roosting sites.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact BIO-3: Future development under the Plan would introduce new sources of artificial lighting that could impact wildlife.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact BIO-4: Future development under the Plan could result in bird collisions, causing injury or death.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact CUL-1: Future development projects under the Plan could indirectly or directly impact known and unknown historic buildings and structures by removing historic buildings and structures, or altering the setting for historic properties.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact CUL-2: Future development projects under the Plan could inadvertently discover unknown archaeological	LTS/M	**NI**	LTS/M	LTS/M	LTS/M

Impacts	Proposed Project	No Project, No New Development Alternative	No Project, Existing Plans Alternative	Reduced Criteria Pollutant Emissions Alternative	Enhanced TDM Alternative
resources during construction.					
Impact CUL-3: Future development projects under the Plan could inadvertently discover human remains during construction.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact GEO-1: Future development under the Plan could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving liquefaction.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact GHG-1: Implementation of the Plan would exceed the GHG emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under SB 32 or the carbon neutrality goal under AB 1279.	SU	**NI**	SU	SU	SU
Impact GHG-C: Implementation of the Plan would result in a significant cumulative GHG impact.	SU	**NI**	SU	SU	SU
Impact HAZ-1: Future development within the	LTS/M	**NI**	LTS/M	LTS/M	LTS/M

Impacts	Proposed Project	No Project, No New Development Alternative	No Project, Existing Plans Alternative	Reduced Criteria Pollutant Emissions Alternative	Enhanced TDM Alternative
Plan could encounter and disturb contaminated soil, soil vapor, and groundwater, and result in adverse effects on construction workers, existing residents and employees, and nearby sensitive receptors.					
Impact NOI-1: Future construction associated with development under the Plan could result in temporary construction noise impacts.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact NOI-2: Future development under the Plan could result in interior noise levels in excess of 45 dBA.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Impact NOI-3: Future construction associated with development under the Plan could result in damage to existing buildings from temporary construction vibration.	LTS/M	**NI**	LTS/M	LTS/M	LTS/M
Meets City's Objectives?					
Objective 1	Yes	No	Partially	Partially	Yes
Objective 2	Yes	No	No	Partially	Yes
Objective 3	Yes	No	No	Partially	Yes
Objective 4	Yes	No	No	Partially	Yes

Notes: LTS/M = less than significant impact with mitigation incorporated; LTS = less than significant impact; NI = no impact

Bold text indicates being environmentally superior to the proposed project.

7.2.2.4 *Environmentally Superior Alternative*

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (Section 15126.6(e)(2)). The environmentally superior alternative would be the No Project, No New Development Alternative. This alternative would avoid all the environmental impacts of the Plan. However, this alternative would not accomplish any of the Plan's environmental benefits nor would it meet any of the Plan's objectives. Beyond the No Project Alternative, the Reduced Criteria Pollutant Emissions Alternative would be the environmentally superior alternative. Under this alternative, the significant NOx emissions disclosed in Impact AIR-3 would be reduced to less than significant, however, the Plan's ROG emissions would remain above the threshold. All other significant and unavoidable impacts of the Plan would continue to result (i.e. rate of trip growth and GHG impacts), although at an incrementally reduced levels given the 20 percent reduction in development would lead to reduced criteria pollutants, and reduced GHG emissions from mobile sources. The other potentially significant impacts resulting from the Plan would be similar in magnitude under this alternative and would require compliance with the same General Plan policies, Specific Plan Project Requirements, and standard requirements, to reduce to a less-than-significant level. With 20 percent fewer trips, there would be incrementally reduced roadway noise, and incrementally improved vehicle level of service on area roadways.

Section 8.0 References

The analysis in this Environmental Impact Report is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 9.0 Lead Agency and Consultants

9.1 Lead Agency

City of San Carlos

Al Savay, Community and Economic Development Director
Lisa Porras, Planning Manager
Sajuti Haque, Economic Development & Housing Manager
Rendell Bustos, Senior Planner
Lisa Costa Sanders, Good City Company

9.2 Consultants

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Environmental Consultants and Planners

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Nelson\Nygard Consulting Associates
Transportation Consultants

Section 10.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing material
AFY	acre-feet per year
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AIA	Airport Influence Area
AMSL	above mean sea level
APN	Assessor's Parcel Number
ATCM	air toxic control measure
Bay Area	San Francisco Bay Area
BFE	base flood elevation
bgs	below ground surface
BMP	Best Management Practice
BPMP	Bicycle and Pedestrian Master Plan
BRSSD	the Belmont-Redwood Shores Elementary School District
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
Cal Water Mid-Peninsula District	California Water Service Mid-Peninsula District
CBC	California Building Standards Code
CCA	Community Choice Aggregate
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
C/CAG	City/County Association of Governments of San Mateo County
CFC	California Fire Code
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Program
CIWMB	California Integrated Waste Management Board
CLUP	Comprehensive Land Use Plan
CMA	Congestion Management Agency
CMAP	City of San Carlos 2021 Climate Mitigation and Adaptation Plan
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalents
CRHR	California Register of Historical Resources
CSMHSA	County of San Mateo Health Services Agency
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment

EV	electric vehicle
EVCS	electric vehicle charging stations
EVSE	Electric Vehicle Supply Equipment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GHGRS	Greenhouse Gas Reduction Strategy
GI	Green Infrastructure
GWh	gigawatt hour
GWP	Global Warming Potential
Habitat Plan	Santa Clara Valley Habitat Plan
HFC	hydrofluorocarbon
HSWA	Hazardous and Solid Waste Amendments
ibid	Same source as previous footnote
ISG	Individual Supply Guarantee
JPA	Joint Powers Authority
LID	low impact development
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
L_{max}	Maximum A-weighted noise level during a measurement period
LBP	lead-based paint
LCI	Governor's Office of Land Use and Climate Innovation
LOS	Level of Service
LRA	Local Responsibility Area
MGD	million gallons per day
MBTA	Migratory Bird Treaty Act
MJHMP	San Mateo County Multi-Jurisdictional Local Hazard Mitigation Plan
$MMTCO_2e$	million metric tons of carbon dioxide equivalent

MND	Mitigated Negative Declaration
mpg	miles per gallon
MPWD	Mid-Peninsula Water District
MROSD	Midpeninsula Regional Open Space District
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
MSL	mean sea level
MTC	Metropolitan Transportation Commission
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act of 1966
NOI	Notice of Intent
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOD	Notice of Determination
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OITC	Outdoor-Indoor Transmission Class
OHW	ordinary high water mark
PAMF	Palo Alto Medical Foundation
PCB	polychlorinated biphenyls
PCE	Peninsula Clean Energy
PFC	perfluorocarbon
PDA	Priority Development Areas
PG&E	Pacific Gas and Electric Company
PM	particulate matter

PM_{10}	particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
ppd	pounds per day
PPV	Peak Particle Velocity
RC-SCFD	Redwood City-San Carlos Fire Department
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Need Allocation
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWS	Regional Water System
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo County Transit District
SB	Senate Bill
SBR	South Bay Recycling
SCMC	San Carlos Municipal Code
SCP	Stormwater Control Plan
SCS	Sustainable Communities Strategy
SDMP	Citywide Storm Drain System Master Plan
SF_6	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCSO	San Mateo County Sheriff's Office
SCSD	San Carlos School District
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SMGB	State Mining and Geology Board
SMP	Site Management Plan
SO_x	sulfur oxides
SR	State Route

SRA	State Responsibility Area
SRP	San Mateo County Stormwater Resource Plan
SSMP	San Carlos Sanitary Sewer Management Plan
SSO	sanitary sewer overflow
STC	Sound Transmission Class
SUHSD	Sequoia Union High School District
SVCW	Silicon Valley Clean Water
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
TCR	Tribal Cultural Resource
TDM	Transportation Demand Management
Title 24	Title 24, Part 6 of the California Code of Regulations
TMDL	total maximum daily load
TOC	Transit Oriented Community
TPA	Transit Priority Area
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VHFSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WELO	Water Efficient Landscape Ordinance
Williamson Act	California Land Conservation Act
WMP	waste management plan
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WUI	wildland-urban interface
WWTP	Wastewater Treatment Plant
ZNE	zero net carbon emission

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