

Final EIR
Northeast Area Specific Plan
SCH# 2024070063



Prepared by



In Consultation with



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Appendix A: Draft EIR Comment Letters

Section 1.0 Introduction

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the Northeast Area Specific Plan (referred to as the “Plan” herein).

1.1 Purpose of the Final EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of San Carlos and any Responsible Agencies in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
- (3) The Final EIR reflects the lead agency’s independent judgment and analysis.

1.2 Contents of the Final EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft;
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- d) The Lead Agency’s responses to significant environmental points raised in the review and consultation process; and
- e) Any other information added by the Lead Agency.

1.3 Public Review

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced in the Final EIR are available for public review on the City’s website:

<https://www.sancarlosnortheastplan.com/>.

Section 2.0 Draft EIR Public Review Summary

The Draft EIR for the Plan project, dated March 2026, was circulated to affected public agencies and interested parties for a 46-day review period from March 2, 2026 through April 16, 2026. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of Draft EIR was published on the City’s website (<https://www.sancarlosnortheastplan.com/>), in San Carlos City Hall, and in the San Mateo Daily Journal;
- A copy of the Notice of Availability of Draft EIR was emailed to an email list consisting of members of the public who had indicated interest or commented on the project;
- Notification of the availability of the Draft EIR was mailed to property owners and tenants in the project-area and within a radius of 300 feet of the project boundary;
- The Draft EIR was delivered to the State Clearinghouse on March 2, 2026, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City’s website (<https://www.sancarlosnortheastplan.com/>), San Carlos City Hall, and San Carlos Library.

Section 3.0 Draft EIR Recipients

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies.

The NOA for the Draft EIR was sent to owners and occupants adjacent to the Plan area and to adjacent jurisdictions. The following agencies received a copy of the Draft EIR from the City or via the State Clearinghouse:

- AT&T
- Bay Area Air District
- Bay Area Association of Governments
- California Air Resources Board
- California Department of Transportation (Caltrans), District 4
- Caltrans Planning
- California Department of Fish and Wildlife
- California Department of Toxic Substances Control
- California Water Service Mid-Peninsula District
- City of Belmont
- City of Redwood City
- Comcast
- Mid-Peninsula Water District
- Native American Heritage Commission
- Office of Historic Preservation
- Pacific Gas & Electric Company
- Recology
- Rethink Waste
- San Carlos School District
- San Mateo County Environmental Health
- San Mateo County Planning and Building Division
- San Mateo County Transit District
- San Mateo Local Agency Formation
- San Francisco Regional Water Quality Control Board

Section 4.0 Responses to Draft EIR Comments

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of San Carlos on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the City of San Carlos are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below.

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Federal and State Agencies

A. California Department of Transportation (dated April 13, 2026)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the San Carlos Northeast Area Specific Plan (NEASP). The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the March 2026 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project is to develop the NEASP, which will guide new development within the approximately 145-acre Plan area. The NEASP would be built out over an approximate 20-year period and would allow for a net increase of 1,890 residential units in the Plan area, where no residential units currently exist, as well as increase the net square footage of existing non-residential land uses. The Plan also proposes multi-modal transportation improvements. The Plan area is located between U.S. Route 101 (U.S. 101) and State Route 82 (SR 82) and is bound by U.S. 101 on its eastern side.

Response A.1: This comment is a general summary of the proposed Plan and does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.2: Travel Demand Analysis

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

The project's VMT analysis and significance determination are undertaken in a manner consistent with the Office of Land Use and Climate Innovation's (LCI) Technical Advisory or the City's adopted VMT policy. Per the DEIR, this project is found to have a less than significant VMT impact.

Response A.2: The comment acknowledges that the Draft EIR's analysis of Vehicle Miles Travelled (VMT) impacts was completed in accordance with best practices, including the City's own VMT policy. Further, the comment accurately represents the Draft EIR's finding of less than significant VMT impacts. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.3: Climate Change and Sea Level Rise

Please keep the Caltrans District 4 Climate Change Planning team informed of Sea Level Rise (SLR) and flooding considerations within the project area. Caltrans participates as a Technical Advisory Committee (TAC) member for the ongoing Redwood Shores SLR Protection Project and is particularly interested in continued discussions regarding resilience along both Belmont Creek and Pulgas Creek. Evidence indicates that, by 2100, flooding and associated flows may overtop U.S. 101 and extend to areas west of the highway. Caltrans also partners with OneShoreline to address flooding concerns affecting U.S. 101 along and near Belmont Creek.

Given the project’s intent to address flooding and SLR through resilience improvements along Belmont Creek (such as green stormwater infrastructure), Caltrans requests regular updates on proposed and implemented measures. Since the project area borders U.S.101 and Belmont Creek could convey flooding, stormwater, and tidal influence toward the State’s Right-of-Way (ROW), changes within the creek corridor and watershed may directly affect US-101 conditions downstream. Please keep Caltrans updated on planned improvements, design assumptions, and any monitoring results related to Belmont Creek resilience efforts. Please reach out to the Climate Change Branch at D4_ClimateResilience@dot.ca.gov for any questions or concerns.

Response A.3: The comment is acknowledged. As the EIR is programmatic in nature, no specific development project is proposed at this time. The City acknowledges Caltrans’ concerns regarding future impacts from sea level rise and flooding, in particular along U.S. 101. As indicated by the commenter, the Plan includes resiliency standards to address flooding risk and reduce impacts on existing drainage infrastructure (refer to pages 31 through 34 of the Draft EIR). The City will continue to coordinate with responsible agencies, as appropriate. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.4: Hydrology

The developments proposed within the plan may impact the existing drainage systems along southbound U.S. 101. As part of the encroach permit application, please submit plan views, profiles, cross sections, and detailed drawings of all drainage facilities, along with hydrologic calculations comparing pre and post development conditions at this location.

The Office of Hydraulics would like to ensure that no surface runoff from the developments within this plan directly enters the roadside ditch located between the project site and southbound U.S. 101. Additionally, that discharge from the new developments does not adversely affect the existing U.S. 101 drainage system, particularly during the rainy season.

Response A.4: The comment is acknowledged. As the EIR is programmatic in nature, no specific development project is proposed at this time. Therefore, any future development in the Northeast Area Plan that requires an encroachment permit will need to provide detailed drawings of all drainage facilities to the satisfaction of Caltrans. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.5: Aeronautics

Given the program-level nature of the NEASP, the Office of Aeronautics would like to reiterate their previous comments to ensure these considerations are carried forward during plan implementation. As noted previously, one of the goals of the Caltrans Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions or their equivalent (ALUC), to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq.

The proposed project is in Safety Zone 6 (Traffic Pattern Zone), with a portion of the Project site in Safety Zone 3 (Inner Turning Zone) of the San Carlos Airport, established by the San Mateo County ALUC pursuant to Section 21675(c). Therefore, the proposed Project shall adhere to the safety and land use criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) formed by the ALUC pursuant to the PUC Section 21674 and Section 21676 and may be subject to review authority by the ALUC.

Response A.5: The Plan’s relationship to the Airport Land Use Computability Plan is described on pages 173, 174, 183, and 184 of the Draft EIR. As explained on page 183 of the Draft EIR, commercial (i.e., office and retail), manufacturing, R&D, industrial uses, and residential are all considered compatible uses in Safety Zone 6. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.6: A portion of the project site is also in the 60 decibel (dB) community noise level contour (CNEL) of the Future Conditions (2035) Aircraft Noise Contours for the San Carlos Airport per the ALUCP. Development in this area would be subject to the noise compatibility policies of the ALUCP. Of note, multi-family residential development in the 60 dB CNEL contour is conditionally compatible and must be capable of attenuating exterior noise levels to an interior noise level of CNEL 45 dB or lower.

Response A.6: As stated on page 183 of the Draft EIR and further 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. Future development within the Plan would adhere to General Plan Policies NOI-1.11 and NOI-1.13, SCMC Sections 18.21.050-F and 18.21.150-C, as applicable, to ensure compatibility with aircraft noise. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.7: PUC Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces. In accordance with Federal Aviation Regulation, Part 77 “Objects Affecting Navigable Airspace” a Notice of Proposed

Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). For further information or a copy of Form 7460-1, please refer to the FAA website (link).

Response A.7: As stated on page 183-184 of the Draft EIR, future development proposals would be reviewed by the City/County Association of Governments (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. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.8: Lastly, in accordance with PUC Section 21676 et seq., prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the ALUC, the local agency shall first refer the proposed action to the ALUC. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified.

These comments reflect the areas of review by Caltrans Aeronautics with respect to airport-related noise, safety, and land use planning issues. Caltrans Aeronautics appreciates the opportunity to comment. Should you have any questions regarding these comments, please contact aeronautics-planning@dot.ca.gov.

Response A.8: As required by General Plan Policy ESPS-6.1, the proposed Plan was submitted to the San Mateo County Airport Land Use Commission for review/action, pursuant to California Public Utilities Code Section 21676(b). As a result, the San Mateo County Airport Land Use Commission found the Plan consistent with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport on April 23, 2026. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.9: Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (link).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Response A.9: The comment is acknowledged. As the EIR is programmatic in nature, no specific development project is proposed at this time. Therefore, any future developments in the Northeast Area Plan that require movement of oversized or excessive load vehicles on State roadways will be responsible for securing a transportation permit issued by Caltrans. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.10: Equitable Access

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

Response A.10: The comment is acknowledged. As the EIR is programmatic in nature, no specific development project is proposed at this time. Therefore, any future development in the Northeast Area Plan that impact Caltrans facilities will be required to ensure that those facilities meet Americans with Disabilities Act (ADA) Standards after project completion. It is also acknowledged that future projects must maintain bicycle and pedestrian access during construction. The comment does not raise any specific issues about the adequacy of the Draft EIR.

Comment A.11: Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the NEASP development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Response A.11: The comment is acknowledged. The City has engaged in a lengthy public outreach process as part of developing the Northeast Area Specific Plan, including 12 outreach meetings between August of 2023 through November of 2024 that included community workshops, focus group meetings, and pop-ups. Additionally, as part of the CEQA process, the City sent letters to tribes listed by the Native American Heritage Commission as having a potential affiliation to the Plan area. The City did not receive any requests from the tribes to consult pursuant to Senate Bill 18 or Assembly Bill 52 (refer to page 280 of the Draft EIR). The comment does not raise any CEQA-related issues; therefore, no further response is required.

Comment A.12: Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant’s Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process. To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Response A.12: The comment is acknowledged. As the EIR is programmatic in nature, no specific development project is proposed at this time. Therefore, any future development in the Northeast Area Plan that requires temporary or permanent work in, under, or over any portion of the State highway ROW will be responsible for securing an encroachment permit.

The City acknowledges and appreciates Caltrans’ participation in the environmental review process. The comment does not raise any CEQA-related issues; therefore, no further response is required.

Regional and Local Agencies

B. San Mateo County Environmental Health Services (dated March 5, 2026)

Comment B.1: San Mateo County Environmental Health Services (SMCEHS) received the Notice of Availability of the Draft EIR for the Northeast Area Specific Plan. Based on review of the Plan, it is evident that the area contains many properties where subsurface pollution from historical use are undergoing correction action (i.e. investigation, cleanup, or monitoring) or have received regulatory closure with contamination remaining in-place. Regulatory oversight for these cases is provided by either SMCEHS Groundwater Protection Program (GPP), Regional Water Quality Control Board (RWQCB), or Department of Toxic Substances Control (DTSC) staff. As redevelopment proceeds, lingering environmental issues at these sites will need to be addressed to ensure the proposed redevelopment does not pose an unacceptable risk to human health and the environment and that contaminated media generated during construction activities is properly managed and disposed of (through implementation of a Site Management Plan).

You can view properties of concern within the Northeast Area Specific Plan on the Geo Tracker (<http-s://geotracker.waterboards.ca.gov/>) and EnviroStor (<http-s://www.envirostor.dtsc.ca.gov/P-Ublic/>) databases.

Response B.1: Pages 174 through 178 of the Draft EIR provide an overview of the existing on-site and off-site sources of hazardous materials contamination in the Plan area. Consistent with the comment, the Draft EIR acknowledges the potential for impacted soil and/or groundwater due to the historical uses in the Plan, including disclosure of open cases and/or land use restrictions. As explained on pages 181 through 182 of the Draft EIR, the General Plan has policies (ESPS-5.3, ESPS-5.5 and ESPS-5.6) that would ensure that future developments under the Plan mitigate hazard exposure, prepare project-level site assessments, and/or remediate contamination under the authority of relevant regulatory agencies (i.e., San Mateo County Environmental Health Services (SMCEHS), the Regional Water Quality Control Board (RWQCB), or Department of Toxic Substances Control (DTSC)). The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

Comment B.2: Please ensure that SMCEHS-GPP, RWQCB, and DTSC staff are contacted early in the redevelopment process for any property with subsurface contamination so that we can review the proposed development and determine appropriate environmental measures to be undertaken. The agency providing oversight at a site should be contacted first to provide feedback. SMCEHS-GPP staff, as the local agency, can provide guidance on any properties with newly discovered environmental issues or situations where off-site sourced contamination has impacted a property that requires environmental management during redevelopment.

We look forward to working with you as this area undergoes redevelopment.

You can always reach out directly to me with any questions.

Response B.2: The comment is acknowledged. Consistent with the City's current practice and General Plan policies noted above under response B.1, future development projects will be required to coordinate with the appropriate regulatory agencies when applicable to determine appropriate environmental measures to be undertaken based on the proposed land use. The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

C. Local Agency Formation Commission (dated April 15, 2026)

Comment C.1: Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Northeast Area Specific Plan and Final Draft of the Northeast Area Specific Plan (Plan).

The Local Agency Formation Commission (LAFCo) is a state mandated local agency established in every county to oversee the boundaries of cities and special districts. San Mateo LAFCo has jurisdiction over the boundaries of the 20 cities, 21 independent special districts, and many of the 34 active county and city governed special districts serving San Mateo County.

San Mateo LAFCo has the following comments on the DEIR and Plan:

1) In the DEIR and Plan identify that portions of the Northeast Area are served by Cal Water Mid-Peninsula District (a private company) and the Mid-Peninsula Water District (an independent special district). The DEIR and Plan states that the use of recycled water may be explored at a future date for the Northeast Area. The Proposed Infrastructure Narrative notes that the City of San Carlos and the Mid-Peninsula Water District (MPWD) may review the possibility of connecting to the City of Redwood City's recycled water system.

Currently, MPWD provides potable water and water for fire suppression within the District's boundaries. If MPWD was to provide recycled water service in the future, approval from LAFCo may be required in order for the District to provide a new or different service, such as recycled or reclaimed water (Government Code Section 56824.10 et seq). If recycled water services are proposed to be provided within MPWD's service area, it is recommended that MPWD discuss the proposal with LAFCo to review if a LAFCo process would be required.

San Mateo LAFCo looks forward to reviewing all future documents related to the Draft Environmental Impact Report for the Northeast Area Specific Plan and Final Draft of the Northeast Area Specific Plan.

Response C.1: The comment is acknowledged. Mid-Peninsula Water District (MPWD) is a separate public agency from the City. MPWD would be responsible for obtaining any future recycled water approvals or reviews from LACFO and any other agencies with jurisdiction over use of recycled water. If recycled water becomes

available in the Plan area, the City would ensure that future development projects incorporate recycled water. The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

D. City of Belmont (dated April 16, 2026)

Comment D.1: The City of Belmont appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the San Carlos Northeast Area Specific Plan (NEASP). As you know, the City of Belmont is undertaking a Specific Plan process for the Harbor Industrial Area (HIA) in preparation for potential annexation of the area into the City. Belmont supports continued coordination between our agencies to address shared infrastructure systems and regional environmental challenges, and issues related to the ultimate redevelopment of the currently underutilized properties that impact our collective jurisdictions.

These comments are focused on key issues under the California Environmental Quality Act (CEQA) where additional clarification or analysis would be beneficial to ensure full disclosure and an accurate understanding of environmental impacts. We are submitting a companion letter that outlines other technical issues and opportunities for collaboration between Belmont, San Carlos, and other affected agencies (San Mateo County, Silicon Valley Clean Water, Mid-Peninsula Water District, etc.).

The City of Belmont offers the following CEQA comments:

I. Regional Nature of Belmont Creek Improvements

The DEIR characterizes several Belmont Creek improvement projects in a manner that could be interpreted as City of Belmont–specific infrastructure. Belmont requests clarification of the record related to this topic.

Response D.1: This comment is a general question on the proposed Plan and does not raise any specific issues about the adequacy of the Draft EIR. The Plan establishes standards for development within the Plan that would occur adjacent to Belmont Creek, including implementation of a 10-foot wide multi-use path along Belmont Creek (page 27 of the Draft EIR) and a 35-foot setback from the existing top of bank for development along the creek. The Plan assumes that future development along the south side of Belmont Creek will implement these improvements. It is unclear what Belmont-specific infrastructure the comment is referencing. It is noted that Appendix J of the Draft EIR references several background studies that have been prepared to evaluate flooding from Belmont Creek. These improvements to Belmont Creek are not part of the Plan nor did the EIR evaluate them. Build-out of the Plan could happen independently of these contemplated Belmont Creek improvements. Based on the Flood Impact Study prepared for the Plan (Appendix E of the Draft EIR), 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.

Comment D.2: The County of San Mateo, City of Belmont, and City of San Carlos have worked collaboratively to address persistent flood risk, creek erosion, and water quality issues in the Belmont Creek watershed. This is evidenced by numerous collective efforts in recent years and documented in the Belmont Creek Funding Agreement, signed by Belmont, San Carlos and San Mateo County, and amended on November 12, 2024. The following projects are regional, multi-agency efforts:

- Twin Pines Park Belmont Creek Restoration Project
- Twin Pines Park Stormwater Detention Basin
- Harbor Boulevard Bypass (long-term downstream capacity improvement)

These projects are intended to function as integrated upstream and downstream system improvements. They address watershed-scale flooding, sedimentation, and water quality issues and provide documented benefits to San Carlos, Belmont, and unincorporated San Mateo County (Harbor Industrial Area). Belmont Creek is a regional system crossing jurisdictions, and flood risks and solutions are not confined to a single city.

Accordingly, the DEIR should:

- Avoid characterizing these improvements as Belmont-only obligations
- Recognize their regional function and shared benefit
- Avoid reliance on these projects as committed mitigation to NEASP impacts without identifying appropriate cost-sharing and implementation responsibilities

We believe that this better reflects the ten-plus years of coordinated planning among multiple agencies and clarifies the complexity and inter-relationship of the jurisdictions involved in the ultimate watershed infrastructure solutions.

Response D.2: Refer to response D.1 above on the Belmont Creek improvements. Throughout the Draft EIR, it is explained that the Plan (i.e., future development) would implement a 10-foot wide multi-use path along Belmont Creek (page 27 of the Draft EIR) and a 35-foot setback from the existing top of bank for development along the creek. The Plan incorporates these standards in accordance with the City's Pulgas Creek Watershed Management Plan and OneShoreline's Planning Policy Guidance. The 35-foot buffer provides additional space and flexibility in the types of flood protection infrastructure that can be used to protect from increased storm runoff and sea level rise.

No other improvements to Belmont Creek are evaluated as part of the Plan, including any improvements that would be undertaken by the City of Belmont. As

explained above under response D.1, the Plan could happen independently of the off-site Belmont Creek improvements and 100-year runoff would decrease under the Plan, thereby reducing downstream flooding impacts. The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

Comment D.3: II. Storm Drainage and Flooding

The DEIR's conclusions regarding flood impacts rely in part on assumptions regarding off-site infrastructure and watershed performance that would benefit from further clarification.

A. Reliance on Unfunded or Uncommitted Infrastructure

The DEIR references improvements within the Belmont Creek system that are not fully funded or implemented. While these projects are advancing, they are:

- Regional in nature
- Dependent on multi-agency coordination and funding
- Not solely within the control of the City of Belmont

The improvements lack clear funding sources or funding mechanisms, defined implementation responsibilities, and enforceable timing and sequencing. The impact analysis should not rely on this infrastructure and should be updated accordingly.

Response D.3: It is unclear what offsite infrastructure within the Belmont Creek system the commenter is referencing, refer to response D.1 and D.2 above. As explained on page 30 of the Draft EIR, future development under the Plan would be required to upsize several storm drain pipes or pay a fair share contribution to the improvement in accordance with the 2017 City of San Carlos Storm Drain Master Plan. These improvements would all occur within the Plan boundaries.

As discussed on page 197 through 199 of the Draft EIR, 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 and a 10-foot-wide multi-use path along Belmont Creek. It is anticipated that future development along Belmont Creek would implement the multi-use path. 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.

Based on the Flood Impact Study prepared for the Plan (Appendix E of the Draft EIR), 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.

As discussed on page 30 of the Draft EIR, 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. The Plan also incorporates resiliency standards (pages 31 through 34 of the Draft EIR) that would serve to avoid impacts related to impeding or redirecting flood flows.

Comment D.4: B. Need for Watershed-Based Analysis

Given that Belmont Creek is a shared system, the evaluation of flood impacts should reflect watershed-scale conditions rather than jurisdictional boundaries alone. The current analysis does not clearly demonstrate how changes in runoff, timing, or system performance may affect downstream areas, including the HIA.

Response D.4: The Flood Impact Study prepared for the Plan (Appendix E of the Draft EIR) determined that 100-year runoff resulting from properties within the Plan 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 compared to baseline conditions within the Plan.

Comment D.5: III. Belmont Creek Ownership and Maintenance Responsibilities

Belmont requests clarification in the DEIR that:

- Belmont Creek, particularly downstream of Old County Road, forms a boundary between jurisdictions
- Maintenance responsibilities are generally borne by adjacent property owners within each jurisdiction, not solely by a single city

This distinction is important to avoid mischaracterization of long-term operational responsibilities associated with creek improvements.

Response D.5: As stated on page 4 of the Draft EIR, “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).” Accordingly, the Draft EIR appropriately characterizes the boundaries of the Plan with respect to Belmont Creek and Old County Road and no revisions to the Draft EIR are warranted.

As discussed on page 197 through 199 of the Draft EIR, 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 and a 10-foot-wide trail along Belmont Creek. It is anticipated that future development along Belmont Creek would implement the multi-use path. 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. The Draft EIR does not attempt to describe or delineate long-term operational responsibilities associated with creek improvements outside of the Plan.

Comment D.6: IV. Consideration of Foreseeable HIA Governance Scenarios

The DEIR does not evaluate a reasonably foreseeable scenario regarding the future governance of the HIA, specifically whether the HIA remains under County jurisdiction or is annexed to the City of Belmont. These scenarios could materially affect infrastructure demand, service responsibility, and environmental impacts. In particular:

- Annexation could shift infrastructure responsibility and service provision to Belmont
- Alternatively, if the HIA remains under County jurisdiction, Belmont may experience indirect impacts without corresponding regulatory authority

Because these represent distinct impact pathways, the absence of this analysis limits full disclosure under CEQA.

Response D.6: The City understands that the City of Belmont is currently preparing a Draft EIR for the Harbor Industrial Area Specific Plan. At this time, the Draft EIR for the Harbor Industrial Area Specific Plan has not been circulated for public review. The City has no authority over the HIA and whether it is governed by Belmont or the County, nor is the City equipped to evaluate the scenarios noted in the comment, as the City does not and would not serve the HIA under any of the scenarios. The City anticipates that the City of Belmont's Draft EIR would evaluate the various governance scenarios described above and the associated infrastructure demand effects, whereas the Northeast Area Specific Plan Draft EIR is evaluating the environmental effects of the proposed Northeast Area Specific Plan, in combination with anticipated cumulative development. 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)). Table 3.0-1 of the Draft EIR identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis, including the Harbor Industrial Area Specific Plan. The Water Supply Assessment prepared for the Northeast Area Specific Plan by the Mid-Peninsula Water District accounts for the water demand of the Harbor Industrial Area Specific Plan (refer to Appendix I of the Draft EIR).

Comment D.7: V. Deferral of Infrastructure Analysis

The DEIR relies on deferral of certain infrastructure evaluations to future project-level analysis. Belmont is concerned that deferral may lead to unanticipated impacts that cannot be solved at a project level. We suggest that some level of watershed analysis be completed. As noted earlier in

the discussion of storm drainage and flooding, the analysis appears to assume that the detention basin and bypass will be constructed. It does not appear to consider a no-project or delayed project scenario for these improvements.

Response D.7: The Draft EIR does not rely on the comment's referenced detention basin or bypass. As explained in response D.1 above, Appendix J of the Draft EIR references several background studies that have been prepared to evaluate flooding from Belmont Creek. Build-out of the Plan could happen independently of these contemplated Belmont Creek improvements. Based on the Flood Impact Study prepared for the Plan (Appendix E of the Draft EIR), it was determined that 100-year runoff would decrease by three percent under the Plan compared to existing conditions.

The commenter asserts that the Draft EIR improperly defers analysis of required infrastructure improvements to future project-level review. This assertion is not supported by the record.

The Draft EIR for the preparation and implementation of a Specific Plan governing development over a 20-year period evaluates potential impacts related to infrastructure demand at a programmatic level, consistent with CEQA requirements. It identifies the types of infrastructure improvements necessary to support future development (see page 30 of the Draft EIR). As discussed on page 198, implementation of these improvements is expected to reduce 10-year flood depths under full buildout of the Plan. In addition, the Plan incorporates Resiliency Standards requiring future development projects to prepare project-specific hydrology and hydraulic analyses demonstrating that peak stormwater flows at the point of discharge to the existing storm drain system would be reduced compared to pre-development conditions.

Where site-specific engineering details are not yet available, the Draft EIR appropriately provides for subsequent project-level studies to refine infrastructure design and verify consistency with established performance standards. Future discretionary projects will be required to either (1) construct the necessary infrastructure improvements, or (2) contribute a fair share toward planned improvements through applicable funding mechanisms, and those planned improvements would undergo project-level environmental review.

This approach ensures that required infrastructure improvements are clearly identified and will be implemented in a manner that avoids or mitigates significant impacts. The Draft EIR evaluates at a programmatic level the future infrastructure needs to support implementation of the Plan, and does not defer mitigation; rather, it establishes enforceable performance standards and a framework for implementation. Deferral of mitigation is impermissible for project-level environmental review, while programmatic CEQA documents such as the Draft EIR

for the Plan appropriately identify the need for infrastructure to be designed and evaluated at a project-level during the timeframe of the Plan's implementation. Deferral of final design details to later project-level review is permissible under CEQA where, as here, the EIR commits to mitigation and provides sufficient standards to guide its execution.

Comment D.8: Relatedly, the EIR should consider the potential floodplain storage impacts of fill placement for future pad elevations that may occur with development in the NEASP that may impact flood elevations within the HIA.

Response D.8: A Flood Impact Study was prepared for the Plan (refer to Appendix E of the Draft EIR). As discussed on pages 199 through 199 of the Draft EIR, the Plan incorporates several resiliency project requirements that would ensure that future development under the Plan would not result in impacts related to impeding or redirecting flood flows. As redevelopment occurs in the Plan, fill will be placed to elevate building pads and structures above the base flood elevation plus sea level rise, providing some potential to displace the floodplain. For offsite flood flows to be increased, grading and building construction would have to block the active conveyance of flood flows through the project site. To meet the National Flood Insurance Program, future projects would need to demonstrate that they would not result in more than one foot of cumulative impact to the floodplain.

According to the Flood Impact Study, 100-year runoff with the Plan area 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.

Comment D.9: In conclusion, the City of Belmont supports continued collaboration with the City of San Carlos and other regional partners to address shared infrastructure systems. The requested clarifications are intended to: ensure an accurate description of regional infrastructure responsibilities; improve transparency regarding flood risk and watershed conditions; and support informed and coordinated planning across jurisdictions.

Belmont looks forward to continued coordination through both the CEQA process and parallel inter-agency discussions. Thank you for your consideration.

Response D.9: The City acknowledges and appreciates the City of Belmont's participation in the environmental review process. Refer to responses D.1 through D.8. The comment does not raise any specific issues about the adequacy of the Draft EIR and no further response is required.

Organizations, Businesses, and Individuals

E. Lorelei Alli on behalf of the Amah Mutsun Tribal Band of San Juan Bautista (dated March 3, 2026)

Comment E.1: Thank you for the information on the proposed project, and please see the attached documents with our recommendations. If you have any questions about the attached documents, or would like to set up a meeting to discuss consultation, please give us a call at 650-851-7489 or email us at amtbinc21@gmail.com

Response E.1: 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 (refer to page 280 of the Draft EIR), including from the Amah Mutsun Tribal Band of San Juan Bautista. The consultation period concluded on August 2, 2024.

The Amah Mutsun Tribal Band of San Juan Bautista responded to the NOP, which was issued on July 1, 2024. As part of the tribe's comment letter on the NOP and Draft EIR, the tribe recommended that a Sacred Lands File and CHRIS record search be completed for the Plan area. As discussed on page 121 of the Draft EIR, 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 archaeological resources were identified within the Plan or immediate vicinity. The Sacred Lands File results were negative. The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

Comment E.2: Letter of Response Attachment

It is our pride and privilege to be of service for any Native American Cultural Resource Monitoring, Consulting and/ or Sensitivity Training you may need or require. We take our Heritage and History seriously and are diligent about preserving as much of it as we can. Construction is a constant in the Bay Area and with that new discoveries are bound to happen. If you choose our services, we will gladly guide all personnel through proper procedures to safely protect and preserve: Culture, Heritage, and History.

It is highly recommended, if not previously done, to search through Sacred Lands Files (SLF) and California Historical Resource Information Systems (CHRIS) as well as reaching out to the Native American Heritage Commission (NAHC) In order to determine whether you are working in a Cultural and/ or Historic sensitivity.

If you have received any positive cultural or historic sensitivity within 1 mile of the project area here are A.M.T.B Inc's and Amah Mutsun Tribal Band of San Juan Bautista's recommendations:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

If further Consultation, Monitoring or Sensitivity Training is needed please feel free to contact A.M.T.B. Inc. or Myself Directly. A.M.T.B. Inc. 650-851-7747

Response E.2: Refer to response E.1 above regarding the CHRIS record search and Sacred Land File results. Accordingly, given the results were negative for both, monitoring is not required. The Draft EIR concluded that compliance with the General Plan policies LU-1.10, LU-12.1 and LU-12.5, which require preservation of archaeological resources and evaluation of cultural and tribal cultural resources as part of the development review process, as well as existing federal and state law, would protect unrecorded tribal cultural resources 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. The comment does not raise any specific issues about the adequacy of the Draft EIR, accordingly, no revisions to the Draft EIR are warranted.

F. Allen Matkins Leck Gamble Mallory & Natsis LLP (dated April 2, 2026)

Comment F.1: This office represents Hunter Partners, LLC, through its single purpose entity BP I SPE, LLC (collectively, “Hunter”), the owner of real property located at 151 Industrial Road (“Property”) in the City of San Carlos (“City”). These comments pertain to the proposed Northeast Area Specific Plan (“Plan”)¹ and the Draft Environmental Impact Report (“DEIR”)² for the Plan.

I. Background

Hunter owns and operates a self-storage facility on the Property. Self-storage uses provide a unique service that no other type of business can provide, including much-needed extra space for households living in smaller units with limited storage, and much-needed storage for small businesses including landscapers, general contractors, pharmaceutical representatives, home stagers, and a wide variety of other professionals. In turn, self-storage uses strengthen the economic vitality of the City. Self-storage uses are also a less-intensive land use as compared to other uses currently contemplated in the Plan area.

Hunter seeks to redevelop the Property to increase the amount of self-storage capacity, but is currently prohibited from doing so, in part because of its legal nonconforming status.¹ As detailed in our letter dated July 26, 2024, we requested that the Plan include, and the DEIR analyze, the ability to expand an existing lawful non-residential nonconforming use in the Plan area, subject to approval of a conditional use permit (“CUP”).

More specifically, we requested that the following provision be included in the Plan and analyzed in the DEIR: “Any existing lawful non-residential nonconforming use in the Specific Plan may be expanded in its occupancy, building floor area and height, in keeping with the Specific Plan development standards, including through demolition and new construction, subject to Planning and Transportation Commission approval of a conditional use permit in accord with Municipal Code Chapter 18.30, Use Permits.” We question why that request was not fulfilled, particularly since a substantial number of new businesses and residential units will be developed in the Plan area and would benefit from additional storage.

We reiterate that the existing lawful nonconforming self-storage use on the Property should be allowed to expand, subject to approval of a CUP. As you are aware, the purpose of the CUP process is to ensure that the project is “designed, located, and operated in a manner that will not interfere with the use and enjoyment of surrounding properties.” (City Municipal Code, § 18.30.010.) Furthermore, the Planning and Transportation Commission would need to make specified findings to approve the CUP, including that (i) the project will not be adverse to the public health, safety, or general welfare of the community, nor detrimental to surrounding properties or improvements; (ii) the project complies with design and development standards applicable to the zoning district and Plan area; (iii) the design, location, size, and operating characteristics of the expanded self-storage use are compatible with the existing and reasonably foreseeable future land uses in the vicinity and Plan area; and (iv) the project site is physically suitable for the type, density, and intensity of use being proposed, including access, utilities, and the absence of physical constraints. (City Municipal Code, § 18.30.060.) Thus, the City would retain control over such development proposals and would have the power to deny a proposal if it failed to meet the City’s requirements set forth above.

Response F.1: The comment provides general suggestions regarding the proposed Plan but does not raise issues related to the adequacy of the DEIR or present substantial evidence of an environmental impact requiring additional evaluation under CEQA. The comment is acknowledged; however, because it does not pertain to the environmental analysis or conclusions presented in the DEIR, no further response is warranted. Nonconforming uses will not be permitted to expand in floor area or height in the Plan, consistent with limitations on nonconforming uses

¹ See City Municipal Code Chapter 18.19. The existing self-storage facility on the Property was constructed in circa 1997 before the Property was annexed into the City. The DEIR incorrectly states that the facility was constructed in 1974. (DEIR, p. 122.)

citywide. In addition, public storage uses are not recommended as permitted or conditional uses in the Plan.

The EIR has been revised to reflect that the property located at 151 Industrial Road was constructed circa 1997, not 1974 (refer to Section 5.0 Draft EIR Text Revisions). The text revisions do not constitute a “substantial revision” pursuant to CEQA Guidelines §15073.5 and recirculation of the EIR is not required.

Comment F.2: II. Comments on the Plan

Under the Plan, the Property would be rezoned from Industrial Professional (IP) to Production and Innovation (P-I)⁴ and located within the “allowed active use” corridor along Industrial Road and the “Creek Front Zone” adjacent to Belmont Creek.

A. Creek Front Zone & Public Open Space Requirements

The City’s existing Stream Development and Maintenance (SDM) Overlay District requires a 25-foot setback from the top of bank line of Belmont Creek. (City Municipal Code, Chapter 18.14.) However, “[u]nder existing conditions, existing development in the Plan does not provide a 25-foot setback since most development pre-dates the City’s setback requirements.” (DEIR, p. 101.) Therefore, without proper redevelopment, the Plan would result in a disjunct of older buildings adjacent to the creek and new buildings up to 155 feet in height set back from the creek. (DEIR, pp. 14-15; Plan, § 4.14.)

As currently proposed, future development within the Creek Front Zone would be required to be set back 35 feet from the existing top of bank of Belmont Creek “to support stormwater detention for flooding events and sea level rise.”² (Plan, § 6.3.3.) The Plan further provides: “The first 25 feet from the top of bank shall comprise of native riparian vegetation” as “an interface between the creek and the terrestrial environment [which] supports diverse habitats and helps maintain water quality by preventing erosion and filtering pollutants.” (Plan, § 6.3.4.) A “multi-use path for pedestrians and bicyclists shall be built along the riparian landscape” and “shall be at least 10 feet in width.” (Plan, § 6.3.5.)

It appears that the proposed 35-foot setback requirement is merely a guise to force developers to provide a 10-foot public path along the creek, in addition to the existing 25-foot setback requirement. The existing setback requirement has been deemed sufficient for purposes of the City’s SDM Overlay District, and we question whether there is a legitimate basis for extending that to 35 feet, and whether there is a nexus study to support that proposed requirement, which is a de-facto dedication requirement.

² We note that an “additional 15 feet is encouraged for a total of 50 feet.”

Response F.2: The commenter is correct that under the City’s current requirements, developments along Belmont Creek are required to maintain a 25-foot setback from the top of bank (SCMC Section 18.144.040). General Plan Action EM-2.1 considers amendments to the City’s Riparian Ordinance to strengthen stream protection requirements and reduce potential for flooding, including increased setbacks. The 35-foot setback is further supported by applicable local and regional guidance, including the City’s Pulgas Creek Watershed Management Plan and OneShoreline’s Planning Policy Guidance, which recommend a 35-foot setback measured from the top of creek along the San Francisco Bay Shoreline.^{3,4} The 35-foot buffer provides additional space and flexibility in the types of flood protection infrastructure that can be used to protect from increased storm runoff and sea level rise. Further, as documented on pages 101 to 112 of the Draft EIR, the 35-foot setback would serve to reduce impacts to biological resources, including impacts to Belmont Creek and its riparian habitat. The comment is acknowledged; however, because it does not pertain to the environmental analysis or conclusions presented in the DEIR, no further response is warranted.

Comment F.3: The Plan also layers on public open space dedication requirements, which would apply to private property: “For lots greater than 15,000 sq. ft. (0.3 acres) but less than 1 acre, a minimum of 10% shall be required to be publicly accessible open or park space [and for] lots greater than 1 acre, a minimum of 15% shall be required to be publicly accessible.” (Plan, § 4.7.2.) In the Creek Front Zone, “[a]t least 50% of the open space shall directly abut the Belmont Creek Greenway [and all] open spaces shall be accessible to the public via the greenway.” (Plan, § 6.3.2.) There is no evidence of a nexus study that supports these proposed dedication requirements.

The foregoing requirements, in combination with Creek Front Zone requirements, would place a disproportionate burden on properties in the Plan area along Belmont Creek and would significantly limit redevelopment capacity. Furthermore, any additional setback requirements, multi-use path requirements, and open space requirements must factor in other development constraints, such as existing easements. For example, there is an existing PG&E easement on the Property, which already restricts development. We ask that the City revisit and justify these proposed requirements. At a minimum, the City must have the ability to modify Plan requirements on a case-by-case basis. As the City must be aware, its current approach fails to meet the constitutional nexus requirements under the Nollan/Dolan line of cases.

Response F.3: The comment provides general suggestions and opinions regarding nexus requirements regarding the proposed Plan but does not raise issues related to the adequacy of the DEIR or present substantial evidence of an environmental

³ City of San Carlos. *Pulgas Creek Watershed Management Plan*. March 24, 2025. Page 41.

⁴ OneShoreline. *Planning Policy Guidance to Protect and Enhance Bay Shoreline Areas of San Mateo County*. June 2023. Page 34.

impact requiring additional evaluation under CEQA. The comment is acknowledged; however, because it does not pertain to the environmental analysis or conclusions presented in the DEIR, no further response is warranted. The increased setback along Belmont Creek, multi-use path requirements, and open space requirements will be applied uniformly to developments along Belmont Creek in the Plan area and not as individual exactions. These requirements also help offset impacts to Belmont Creek.

The Plan's proposed 15-percent of open space for properties greater than one-acre is an incremental increase from minimum open space required in other mixed-use districts in the City (10 percent). This incremental increase is based on the Specific Plan's Guiding Principle to promote access to open space, as well as the greater community's vision for increased public open space in the City's east side.

Comment F.4: B. Permitted Uses

The Plan only currently provides a list of permitted active ground floor uses, which includes "Indoor Warehousing and Storage" with a CUP. (Plan, § 4.8, Table 6.) That use category includes the storage of commercial goods, industrial equipment, products and materials, cold storage, and freight storage, and as "an ancillary use, includes storage in small individual spaces exclusively and directly accessible to a specific tenant." (City Municipal Code, § 18.40.050(H)(2).) We question why self-storage uses would not also be conditionally permitted in the Plan area, as it is similar to, yet less intensive than, those permitted uses identified above. From a planning perspective, this use would support a substantial number of new businesses and residential units that will be developed in the Plan area and would benefit from additional storage.

The Property is located along the Industrial Road "allowed active use" corridor, the purpose of which is "[t]o create pedestrian and visual activity at the ground floor of new developments." (Plan, § 4.8.1.) If the Property is redeveloped as a larger self-storage facility, active uses⁵ could be provided along Industrial Road (e.g., "maker" spaces), which would be an improvement over existing conditions and consistent with the Plan's goals.⁶

Response F.4: The comment provides general suggestions regarding the proposed Plan but does not raise issues related to the adequacy of the Draft EIR or present substantial evidence of an environmental impact requiring additional evaluation under CEQA. The comment is acknowledged; however, because it does not pertain

⁵ Principally permitted "active uses" would include (but not be limited to) custom manufacturing, general industry, specified research and development activities, and wholesale and distribution. (Plan § 4.8, Table 6.)

⁶ Ground floor active use spaces "shall provide usable spaces with a depth of at least twelve (12) feet without interior obstructions such as walls or partitions" and "shall extend to at least fifty-five percent (55%) of the length of the public street frontage." (Plan, § 4.8.1.)

to the environmental analysis or conclusions presented in the DEIR, no further response or revisions to the EIR are warranted.

Comment F.5: III. Comments on the DEIR

The DEIR should include an analysis of less-intensive non-residential land uses, such as self-storage uses. Currently, the alternatives analysis in the DEIR is legally inadequate because it contains a narrow range of alternatives, none of which would substantially lessen or avoid the following significant and unavoidable impacts:

- **Impact AIR-3:** Buildout of the Plan would result in annual and average daily emissions of ROG, NO_x and PM₁₀, and PM_{2.5} associated with operation of the Plan Area [that] would exceed the Bay Area Air District project-level significance thresholds. (DEIR, p. 323.)
- **Impact AIR-C:** Buildout of the Plan would result in a cumulatively considerable net increase of criteria pollutant emissions. (Id.)
- **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. (DEIR, p. 325.)
- **Impact GHG-C:** Implementation of the Plan would result in a significant cumulative GHG impact. (Id.)

Response F.5: The Draft EIR evaluated a reasonable range of alternatives that were developed according to the objectives of the Plan. Pursuant to CEQA, the EIR should identify alternatives which “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The Draft EIR evaluated a total of seven alternatives, including two reduced development alternatives and an alternative without residential uses and two alternatives that would reduce the overall scale of development. As discussed in Section 7.2 Project Alternatives on pages 315-327 in the DEIR, three alternatives were considered but rejected for further analysis (i.e., a Location alternative, All Employment Alternative, and GHG Reduction Alternative) and four alternatives were selected: two No Project alternatives, a Reduced Criteria Pollutant Emissions Alternative and an Enhanced TDM Alternative. CEQA dictates that an EIR must evaluate a “No Project” alternative (CEQA Guidelines Section 15126(e)1(1)).

CEQA does not establish a minimum number of alternatives to be evaluated, rather the CEQA Guidelines state that “the range of alternatives required in an EIR is governed by a rule of reason.” (CEQA Guidelines Section 15126.6(a) & (f)).⁷ As discussed on page 314 of the DEIR, the alternatives evaluated in this EIR were

⁷ See also *Citizens of Goleta Valley v. Board of Supervisors* (1990); *Laurel Heights Improvement Association v. Regents of the University of California* (1988))

selected because they would reduce and/or eliminate one or more of the significant and unavoidable impacts associated with the project. As such, the Draft EIR evaluated a reasonable range of alternatives that would fully avoid or partially reduce the project's significant and unavoidable impacts.

The commenter suggests that the Draft EIR should evaluate less-intensive non-residential land uses, such as self-storage uses. A non-residential alternative (All Employment Alternative) is presented on page 316 of the DEIR. As discussed in the DEIR, 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. One of 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, any alternative that does not include housing would not meet this fundamental objective.

The commenter also suggests that the Draft EIR should evaluate alternatives with less intensive non-residential land uses, such as self-storage or public storage uses. On page 318 of the DEIR, the No Project, Existing Plans Alternative is presented. Under this alternative, it is assumed that some level of redevelopment would occur in accordance with the existing land use and zoning requirements. The City anticipates that redevelopment would occur on approximately 27 acres within the Plan, resulting in up to 874,000 square feet of net new non-residential uses. As noted on page 318 of the Draft EIR, it is anticipated that 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 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. This alternative would not accomplish most of the Plan's objectives.

Finally, the Draft EIR also evaluated a second reduced scale alternative, the Reduced Criteria Pollutant Emissions Alternative. Under this alternative, development would be reduced by 20 percent. As stated in the Draft EIR, this 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 the comment raises concerns regarding the range of alternatives evaluated in the Draft EIR, the range of alternatives presented in the Draft EIR, as clarified above, was developed according to the rule of reason and satisfies CEQA. Accordingly, no revisions to the Draft EIR are warranted.

Comment F.6: The DEIR includes a “Reduced Criteria Pollutant Emissions Alternative,” but that alternative would not substantially lessen or avoid the foregoing significant and unavoidable impacts. (DEIR, pp. 322-325.) That alternative, which would reduce the Plan’s proposed development by 20%, would only reduce NOx emissions to avoid exceeding that threshold of significance. (DEIR, p. 320.) All other criteria pollutants would continue to exceed the applicable thresholds of significance. (Id.) Furthermore, the “Reduced Criteria Pollutant Emissions Alternative” would only “partially” meet each of the Project objectives and will presumably be rejected by the City for that reason. (DEIR, p. 326.)

Response F.6: The comment incorrectly concludes that the Reduced Criteria Pollutant Emissions Alternative would not substantially avoid or lessen significant and unavoidable impacts. As stated on page 320 of the Draft EIR, the Reduced Criteria Pollutant Emissions Alternative would reduce the project’s significant NOx impact to less than significant. 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. The other significant and unavoidable impacts (i.e. rate of trip growth and GHG impacts) would not be avoided. There is not an alternative that would reduce the significant and unavoidable GHG impact, since there is no Plan alternative that can guarantee carbon neutrality by 2045, as disclosed under the GHG Reduction Alternative on page 316 of Draft EIR.

The City Council will ultimately decide the feasibility of project alternatives based on substantial evidence in the record including the analysis in the EIR.

Comment F.7: The DEIR explains that to reduce the Plan’s ROG emissions to below the significance threshold, the Plan’s development would need to be reduced by approximately 80%. (DEIR, p. 320.) Therefore, the DEIR readily dismisses that potential reduction and “instead focuses on the more achievable goal of avoiding the Plan’s significant NOx impact.” (Id.) That is not legally adequate. The DEIR must also consider an alternative with less-intensive non-residential land uses to substantially lessen or avoid the Project’s significant and unavoidable impacts due to GHG, ROG, PM₁₀, and PM_{2.5} emissions.

As explained in the DEIR, the San Francisco Bay Area Air Basin is already a designated nonattainment area for federal and state air quality standards and the Bay Area Air District is focused on controlling precursor pollutants, including ROG, to reduce Ozone levels. (DEIR, p. 63.) In the Bay Area, particulate matter, including PM₁₀, and PM_{2.5}, is generated from activities such as combustion, factories, and motor vehicles. (Id.) Therefore, it stands to reason that less-intensive non-residential land uses would result in the reduced generation of problematic particulate matter.

Our position is supported by CEQA, the CEQA Guidelines, and related case law. To wit:

- CEQA mandates that the City must not approve a project with a significant unavoidable impact if “there are feasible alternatives . . . that can substantially lessen or avoid those effects.” (Mountain Lion Foundation v. Fish & Game Commission (1997) 16 Cal.4th 105, 1343; Public Resources Code § 21002; emphasis added.)
- CEQA mandates that the EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” (CEQA Guidelines 15126.6; Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 and Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376; emphasis added.)
- As explained by the California Supreme Court: “Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles under the CEQA process.” (Laurel Heights Improvement Association v. Regents of the University of California, supra, 47 Cal.3d, 403-04.)
- The DEIR fails to describe the City’s rationale for not including an alternative that would meet most of the Project objectives and substantially lessen or avoid the Project’s significant and unavoidable air quality impacts contrary to various related CEQA decisions (see, e.g., Center for Biological Diversity v. County of San Bernardino (2010) 185 Cal.App.4th 866; Watsonville Pilots Association v. City of Watsonville (2010) 183 Cal.App.4th 1059.)

Response F.7: Refer to response F.6 for a detailed explanation of the reasonable range of alternatives required under CEQA. The comment suggests that the Draft EIR should consider an alternative with less-intensive non-residential land uses to substantially lessen or avoid the project’s significant and unavoidable impacts due to GHG, ROG, PM₁₀, and PM_{2.5} emissions. As explained in response F.6, the No Project, Existing Plans Alternative would develop the Plan with less intensive non-residential uses (up to 874,000 square feet) in accordance with the existing land use and zoning requirements. This represents an 80 percent reduction in development, which would reduce the significant NO_x and ROG impacts disclosed in Impact AIR-3 to less than significant. All other significant and unavoidable impacts of the Plan would continue to result (i.e. rate of trip growth and GHG impacts), although at incrementally reduced levels given the 80 percent reduction in development would lead to reduced criteria pollutants, and reduced GHG emissions from mobile sources. This alternative would only partially accomplish Project Objective 1, all other objectives would not be realized. A core principle of CEQA is that project alternatives should be capable of feasibly attaining most of the project’s basic objectives (which the No Project, Existing Plans Alternative largely would not) while avoiding or substantially reducing the project’s significant environmental impacts. While the comment raises concerns regarding the evaluation of alternatives, the analysis in the Draft EIR, as clarified above, demonstrates that these concerns have

been adequately addressed. Accordingly, no revisions to the Draft EIR are warranted.

Comment F.8: An alternative with less-intensive non-residential land uses, such as self-storage, would meet most of the Project objectives identified in the DEIR by (1) celebrating and maintaining the area’s industrial legacy, (2) still introducing housing in the Plan area, (3) supporting district-wide access by providing multi-modal infrastructure, (4) addressing flooding and sea level rise, and (5) planning for net new non-residential development through development standards and a community benefits framework.

Response F.8: The EIR is programmatic in nature covering the entire 145-acre Plan area, and no specific development project is proposed at this time. Specific uses, like self-storage or public storage, are not evaluated. Rather, the EIR evaluates residential and non-residential uses in accordance with the Plan’s proposed General Plan land use designations and zoning districts. Refer to responses F.6 through F.8 above for a detailed response on the adequacy of alternatives evaluated in the Draft EIR. Accordingly, no revisions to the Draft EIR are warranted. In addition, public storage uses will not be recommended as permitted or conditional uses in the Plan.

Comment F.9: The Plan area totals 145 acres, and the Plan would result in 1,890 residential units and 4,508,000 net new square feet of non-residential uses. (DEIR, p. 10.) The fact that only two alternatives were fully evaluated in the DEIR – aside from the “no project” alternatives – is blatantly inadequate. We respectfully urge that an alternative with less-intensive non-residential land uses (such as self-storage) must also be considered, and the DEIR must be recirculated.

Response F.9: Refer to response F.6 above for an explanation of the Draft EIR’s alternatives and the requirements under CEQA. As explained in response F.6, CEQA does not establish a minimum number of alternatives to be evaluated. Rather, the Draft EIR evaluated a reasonable range of alternatives that would avoid or partially reduce the project’s significant and unavoidable impacts. As noted above in response F.9, the Draft EIR is programmatic in nature and does not evaluate specific uses, such as self-storage. While the comment raises concerns regarding the range of alternatives, the analysis in the Draft EIR, as clarified above in responses F.6 through F.9, demonstrates that these concerns have been adequately addressed. Accordingly, no revisions to the Draft EIR are warranted. Contrary to the comment, nothing has been raised that represents new significant information that would warrant recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5(a).

G. Greater East San Carlos Neighborhood Board (dated April 6, 2026)

Comment G.1: These comments are regarding the Draft Environmental Impact Report (DEIR) prepared for the Northeast Area Specific Plan by the City of San Carlos. The purpose of the DEIR is to meet the standards set by the California Environmental Quality Act (CEQA) and its Guidelines,

and to keep the public informed about relevant decision-making processes. The document covers the proposed plan but lacks sufficient evidence in parts of the environmental analysis. Additional clarification and analysis are necessary to ensure compliance with CEQA.

1. Adequacy of the Project Description

CEQA requires that an EIR contain a stable, finite, and accurate project description sufficient to allow meaningful evaluation of environmental impacts and alternatives (CEQA Guidelines §15124). The project description for the Northeast Area Specific Plan appears to allow a wide range of development intensities, including substantial residential development, commercial uses, and building heights up to approximately 155 feet.

However, the DEIR does not clearly define the reasonable maximum development scenario that forms the basis of the environmental analysis. Without a clearly defined buildout scenario—including maximum residential units, commercial square footage, and infrastructure assumptions—it is difficult to determine whether the environmental analysis represents the project’s true worst-case impacts. The Final EIR should clarify the development envelope and ensure that all impact analyses reflect the maximum foreseeable development intensity.

Response G.1: Table 2.4-1 on page 10 of the Draft EIR presents the anticipated new development that would occur over the approximate 20-year period of the Plan. As stated in the EIR, the Plan would allow for an increase of 1,890 residential units and up to 4,508,00 net new non-residential square footage. This amount of development is consistently evaluated throughout the Draft EIR. Therefore, the commenter is mistaken that the EIR’s project description does not clearly define the buildout scenario and no further revisions to the EIR are warranted.

Comment G.2: 2. Transportation and Circulation Analysis

The transportation analysis should more clearly evaluate cumulative vehicle miles traveled (VMT) impacts and potential congestion at key access points to U.S. Highway 101 and adjacent arterial roadways. Although CEQA has shifted from level-of-service metrics to VMT pursuant to SB 743, the DEIR must still adequately evaluate localized circulation constraints where safety or operational issues may arise.

Given the constrained roadway network in the northeast portion of San Carlos and the limited number of access points to the area, the DEIR should more fully analyze:

- peak-period access constraints to the highway network.
- potential queuing and spillback impacts at key intersections
- conflicts between truck traffic serving existing industrial uses and new residential uses.
- the effectiveness and enforceability of proposed transportation demand management (TDM) measures

- opportunity to enhance the northbound Highway 101 on ramp at Harbor with the City of Belmont and Caltrans, reducing congestion on the Holly Street overpass.

The EIR should also clarify whether mitigation measures are enforceable performance standards or merely policy recommendations.

Response G.2: A level of service analysis is provided on pages 275 through 278 of the Draft EIR. Peak hour (AM and PM) trip generation estimates are provided in Table 3.17-1 of the Draft EIR. Project-level analysis regarding potential truck conflicts cannot be identified at this time. However, future development projects implementing the Plan would be reviewed as part of the City’s discretionary permit process for potential conflicts.

As discussed on page 37 of the Draft EIR, all new development in the Plan would be subject to Transportation Demand Management (TDM) requirements, unless otherwise noted in Tables 2.4-8 and 2.4-9 of the Draft EIR. The City’s TDM requirements are codified in Chapter 18.25 of the SCMC. As part of the City’s requirements, developments that are subject to the TDM requirements must submit annual reports documenting TDM activities undertaken and their results. After a period of five years, the TDM program must be reviewed in terms of the overall effectiveness and is subject to Director’s review and approval.

The Plan does not propose any changes to the US 101 on- or off-ramp at Holly Street. The ongoing US-101/Holly Street Interchange Project proposes changing the existing interchange from a four-quadrant cloverleaf to a partial cloverleaf configuration with a separate pedestrian overcrossing. It also improves bicycle and pedestrian circulation through the interchange. The lane configuration changes proposed as part of this project were incorporated into the Cumulative without and Cumulative with Plan scenarios.

Given the EIR is programmatic in nature and no specific development project is proposed at this time, future development would be subject to the requirements of the Plan, as well as General Plan Policies. 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. Subsequent projects would be subject to all the requirements identified in the Plan and referenced in the Draft EIR.

Comment G.3: 3. Land Use Compatibility and Industrial–Residential Interface

The proposed integration of residential development within an area traditionally designated for industrial and employment purposes presents potential compatibility issues. The DEIR should provide additional analysis regarding potential conflicts associated with truck circulation, noise, operational emissions, and hazardous materials associated with existing or future industrial uses.

Because the Specific Plan area has historically supported light industrial and life-science activities, the EIR should evaluate whether future residents could create pressure to curtail lawful industrial operations. CEQA requires disclosure of such land-use conflicts where they may result in environmental effects.

Response G.3: The EIR is programmatic in nature covering the entire 145-acre Plan area, and no specific development project is proposed at this time. Therefore, project-level analysis regarding potential conflicts associated with specific projects cannot be identified at this time. While the EIR does not evaluate truck circulation at a project-level, transportation impacts are presented on pages 272 through 275 of the Draft EIR. As noted on page 272 of the Draft EIR, the Plan would not introduce any physical features that would create an obvious transportation safety hazard. Further, future projects implementing the Plan 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. As discussed in Section 2.3.2 of the Draft EIR, the Plan would create or enhance connections to transit, pedestrian, and bicycle facilities. The Plan would also implement various intersection improvements and traffic calming measures.

Land use compatibility is presented on pages 205 through 207 of the Draft EIR. As discussed on page 206 of the Draft EIR, future development in the Plan 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.

Noise impacts, including noise impacts to sensitive receptors (i.e., residences) are presented on pages 224 through 238 of the Draft EIR. The Draft EIR concluded that 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.

Project-level operational air quality emissions are presented on pages 73 through 75 of the Draft EIR. As disclosed on page 74 of the Draft EIR, annual and average daily emissions of ROG and NO_x associated with operation of the Plan Area would exceed the Bay Area Air District project-level significance thresholds (Impact Air 3). The Draft EIR concluded that future development projects would be subject to the 2045

General Plan Reset EIR⁸ Mitigation Measure AQ-2.2, which requires that future development projects prepare and submit a technical assessment evaluating potential operational air quality impacts to the City for review and approval.

Hazardous materials impacts are presented on pages 180 through 186 of the Draft EIR. 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 the Resource Conservation and Recovery Act, Comprehensive Environmental Response, Compensation, and Liability Act, and California Code of Regulations Title 22 (refer to Section 3.9.1.1 Regulatory Framework of the Draft EIR). 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. Further, the Draft EIR concluded that compliance with General Plan Policies ESPS-5.3, ESPS-5.5, and ESPS-5.6 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.

Comment G.4: 4. Flooding, Sea Level Rise, and Climate Resilience

The project area's proximity to Belmont Creek and the San Francisco Bay warrants a more detailed analysis of long-term flood risk, including projected sea-level rise scenarios. Given the long planning horizon of the Specific Plan, the DEIR should evaluate potential risks under multiple sea-level rise projections consistent with state guidance.

The EIR should also clarify:

- the design standards assumed for flood protection infrastructure
- long-term maintenance responsibilities for flood control improvements
- potential cumulative impacts related to regional sea-level rise adaptation planning
- Without this information, it is difficult to determine whether proposed mitigation measures would adequately reduce potential impacts to a less-than-significant level.

Response G.4: CEQA requires the analysis of environmental impacts of a project (or plan) based on baseline conditions. The baseline conditions for the Plan area are the existing conditions of the Plan area at the time the Notice of Preparation was released (in July 2024). Per *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369, effects of the environment (including

⁸ 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.

future forecast conditions that could affect the Plan area) on the project are not considered CEQA impacts. Nevertheless, one of the objectives of the Plan is to address flooding and sea level rise through a robust resilience framework including improvements to Belmont Creek and green stormwater infrastructure. The Plan also includes additional standards in the Sea Level Priority Zone and Creek Front Zone (refer to pages 32 through 34 of the Draft EIR). The Sea Level Priority Zone encompasses the historic San Francisco Bay Shoreline, as shown on Figure 2.4 14 of the Draft EIR. As discussed on page 33 of the Draft EIR, individual future development projects in the Plan would be required to assess sea level rise risk for the site and elevate the finished floor elevation of the new building(s) further above the 100-year base flood evaluation to provide resiliency to future sea level rise (2050).

As explained on page 194 of the Draft EIR, along the shoreline of the City, sea levels are projected to rise approximately two feet by 2050. Elevations in the Plan area range from 13 to 50 feet above sea level. As explained on page 198 through 199 of the Draft EIR, with the incorporation of the above Plan resiliency standards, buildout under the Plan would not result impacts related to impeding or redirecting flood flows.

Chapter 7.3 of the Plan outlines the standards that would be implemented to protect future buildings and infrastructure in the Plan. These standards would require that future development projects in the floodplain perform a hydrology and hydraulic analysis to verify that proposed improvements will not adversely affect the floodplain or exacerbate flooding of other properties. Additionally, future applicants would be required to collaborate with OneShoreline, which provides voluntary planning guidance and design recommendations for tide-affected areas such as the Plan area to account for climate-driven flooding, sea level rise, and groundwater rise.

Comment G.5: 5. Parks

The Draft EIR clearly states that San Carlos is not meeting the standard established in the City's Park Master Plan of 2.5 acres of traditional parkland for every 1,000 residents. The Plan proposes adding 1,890 residential units, but no new community park land is included. The current City Council discussion on the Northeast Plan differs from the City Park Master Plan 2026, which proposes building a new community center at Laureola Park for east side residents and recommends acquiring and improving Sequoia High School District lands near the park entrance. The current Draft EIR commits the city to no new parkland which needs to be reevaluated based on the current City Council recent recommendations and the City Park Master Plan. Where are the community benefits to the eastside community tied to development in the Northeast Plan that increases the quantity and quality of parks on the East side?

However, the Specific Plan does identify the block bound by Glenn Way, Taylor Way, Old County Road, and Bragato Road as an opportunity site for a public park within the Northeast Area. This site would be rezoned to allow mixed use/residential. Because the City does not own this site, and due to State level protections for residential projects, the Specific Plan cannot guarantee a public park will be implemented here. These factors were discussed at the September 8, 2025 City Council Study Session. Nonetheless, the Specific Plan does call for privately-owned public open space throughout the Northeast Area (for both residential and nonresidential uses). While this does not reduce our deficiency in parkland, this does result in new publicly accessible open space throughout the Northeast Area.

Response G.5: Under CEQA, the relevant question is whether a project would increase the use of existing parks or require new or expanded park facilities, such that construction or physical changes to those facilities could result in significant environmental impacts. The City’s General Plan provides a comprehensive framework for the City, including goals and policies for parks and recreational facilities. As noted on page 257 of Draft 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. The General Plan EIR concluded that adherence to SCMC Section 17.32.030 and SCMC Chapter 3.34, which requires residential subdivisions to either provide parkland or pay in-lieu fees to the City to dedicate parkland elsewhere and new residential projects to pay park facility development fees, would reduce impacts to less than significant. While no specific dedicated park facilities are included as part of the Plan, future projects in the Plan on sites greater than one acre would be required to dedicate 15 percent of the total site area toward public open space, as explained on page 257 of the Draft EIR. The Plan also proposes a 10-foot wide multi-use path along Belmont Creek which provides an additional walking route to connect Old County Road to Industrial Road and fosters greater access with the natural features.

Laureola Park and the Sequoia High School District site are outside of the Northeast Area Plan boundary. As indicated by the commenter, the Plan does acknowledge an opportunity site for a public park within the Northeast Area. However, given the City does not own this site, the Plan cannot guarantee a public park will be implemented here. The construction of project-specific parks would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This comment does not raise issues related to the adequacy of the Draft EIR or present substantial evidence of an environmental impact requiring additional evaluation under CEQA.

Comment G.6: 6. Significant and Unavoidable Impacts

1. Air Quality 1

Full implementation of the Plan would raise daily trips by 203% and expand the service population by 193%, causing notable increases in program-level air pollutant emissions.

How will the city track and control air pollution from the combined effects of the Northeast and Eastside Innovation Plans?

Response G.6: As explained on page 83 of the Draft EIR, 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. While at a Plan-level, the project would increase daily trips in excess of the increase in population and, therefore, result in a cumulatively considerable net increase of criteria pollutant emissions. The EIR's determination that the Plan would exceed the Bay Area Air District project-level significance thresholds would not preclude future individual projects from having less than significant air quality impacts. As discussed on page 75 of the Draft EIR, future projects would either need to demonstrate they meet the Air District's screening size to have less-than-significant operational air pollutant emissions or prepare a project-level air quality assessment in accordance with the Air District's CEQA Air Quality Guidelines. Projects implementing the Plan or within the East Side Innovation District Vision Plan would be required to mitigate their impacts to less than significant (to the extent feasible) and a Mitigation Monitoring and Reporting Program would be adopted and implemented by the City.

Comment G.7: Air Quality 2

If fully implemented, the Plan may cause significant dust and diesel emissions unless controlled by specific regulations. The Northeast Plan is a Specific Plan. Provided the land meets the requirements specified in the Plan, it can be approved without undergoing discretionary review. Even with discretionary approvals, how will the City monitor and manage the reduction and elimination of dust and diesel emissions? No strategy is apparent.

Response G.7: As explained on page 76 of the Draft EIR, General Plan Policy EM-6.6 requires that future development projects implement the Bay Area Air District's best management practices (listed on page 77 of the Draft EIR) to reduce fugitive dust impacts to less than significant. As described on page 38 of the Draft EIR, future development projects proposed under the Plan would be examined in light of the EIR to determine whether additional environmental review is needed, including preparation of a health risk assessment to evaluate the effects of diesel emissions. 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 (page 1 of the Draft EIR).

Comment G.8: 2.Air Quality 3

If the Plan proceeds as designed, its development will lead to annual and average daily emissions of Rox and Nox exceeding the significance thresholds established by BAAQMD for projects. Because the Northeast Plan is a Specific Plan, any land use application that meets its requirements will be approved automatically, with no additional review or discretionary process. How will the City track and control Rox and Nox emissions after granting discretionary land use approvals? No strategy is apparent.

Response G.8: Neither the Plan nor the EIR establish a framework that would automatically approve future development applications, rather individual projects would be reviewed according to the development review processes established in the City's Municipal Code. As explained throughout the Draft EIR, future projects would be subject to General Plan Mitigation Measures, Plan Requirements, General Plan Policies, and existing laws and regulations. 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 Draft EIR, the City would require preparation of additional environmental review as applicable. Following completion of environmental review, projects would be subject to the City's standard discretionary review process. Refer to response G.7 above for additional information on subsequent environmental review. Refer to response G.6 for additional information on air quality impacts of future projects.

Comment G.9: 3.Air Quality 4

If the Plan is implemented entirely, it will raise exposure to TACs and PM_{2.5} emissions. Since the Northeast Plan is a Specific Plan, any land use proposal that complies with its guidelines will receive automatic approval, eliminating the need for discretionary review. Even with discretionary approvals for land use review how will the City monitor and manage TAC and PM_{2.5} daily emissions? No strategy is apparent.

Response G.9: Refer to responses G.7 and G.8 above for additional information on subsequent environmental review. With regards to toxic air contaminants (TACs) and PM_{2.5} emissions, future development projects would be reviewed according to the development review processes established in the Municipal Code and required to implement the Bay Area Air District best management practices to reduce fugitive dust impacts to less than significant as explained in response G.7.

Comment G.10: 4. Hazards and Hazardous Materials

Please add mitigation language that the city as a policy encourages the removal of all toxics on site when redevelopment occurs, and not capping toxics in place which will result in historic and continuing adverse impacts to groundwater and the San Francisco Bay

Response G.10: As described on pages 172, 173, 181, and 182 of the Draft EIR, the General Plan contains several policies that serve to mitigate hazards and hazardous materials impacts resulting from planned development within the City, including policies ESPS-5.3, ESPS-5-5, and ESPS-5.6. The specific manner in which a site would be remediated would be determined by the oversight agency, based on the specific circumstances of that site and the proposed land use. Compliance with these 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.

Comment G.11: 7. Cumulative Impact Analysis

CEQA requires an EIR to analyze the cumulative effects of the project when combined with other past, present, and reasonably near future projects (CEQA Guidelines §15130). The DEIR should more clearly describe the cumulative development scenario assumed for San Carlos and surrounding communities, particularly development occurring along the U.S. 101 corridor.

For cumulative impact analysis, it is necessary to identify the projects included in the cumulative scenario and explain the methods used to assess impacts on transportation, infrastructure, and the environment within that context.

Response G.11: Section 15130(b) of the CEQA Guidelines provides that a cumulative impacts discussion should reflect both the severity of the impacts and the likelihood of their occurrence. To meet this standard, the Guidelines allow agencies to rely on either (1) a list of past, present, and probable future projects, or (2) projections contained in an adopted general plan or similar planning document.

Consistent with CEQA Guidelines Section 15130(b)(1), the EIR employs a combination of both approaches (refer to page 41 of the Draft EIR). Specifically, the EIR incorporates a list of related projects (refer to pages 42 through 43), as well as growth projections derived from the City's planning documents. In this regard, the City of San Carlos certified the 2045 General Plan Reset EIR on May 27, 2025, which evaluated development anticipated under citywide buildout conditions through the planning horizon, including the proposed project. These projections provide a comprehensive and policy-consistent basis for evaluating cumulative conditions. Accordingly, the cumulative impact analysis is consistent with CEQA Guidelines requirements and provides a reasonable and adequate assessment of cumulative conditions.

Comment G.12: 8. Alternatives Analysis

The alternatives analysis must show that the EIR thoroughly considered a reasonable selection of options, which could lessen major impacts and still fulfill most key project goals (CEQA Guidelines §15126.6). It is not clear whether the DEIR adequately evaluated alternatives would:

- reduce the overall development intensity
- retain a larger portion of employment-focused land uses
- modify the residential component to reduce transportation and compatibility impacts

The Final EIR needs to thoroughly assess all alternatives so that both the city and the public can make well-informed decisions.

Response G.12: The Draft EIR evaluated a reasonable range of alternatives. Pursuant to CEQA, the EIR should identify alternatives which “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The Draft EIR evaluated a total of seven alternatives, including two reduced development alternatives and an alternative without residential uses and two alternatives that would reduce the overall scale of development. As discussed in Section 7.2 Project Alternatives on pages 315-327 in the DEIR, three alternatives were considered but rejected for further analysis (i.e., a Location alternative, All Employment Alternative, and GHG Reduction Alternative) and four alternatives were presented for consideration by the decision-makers: two No Project alternatives, a Reduced Criteria Pollutant Emissions Alternative and an Enhanced TDM Alternative. CEQA dictates that an EIR must evaluate a “No Project” alternative (CEQA Guidelines Section 15126(e)1(1)).

CEQA does not establish a minimum number of alternatives to be evaluated, rather the CEQA Guidelines state that “the range of alternatives required in an EIR is governed by a rule of reason.” (CEQA Guidelines Section 15126.6(a) & (f)). As discussed on page 314 of the DEIR, the alternatives evaluated in this EIR were selected because they would reduce and/or eliminate one or more of the significant and unavoidable impacts associated with the project. As such, the DEIR evaluated a reasonable range of alternatives that would fully avoid or partially reduce the project’s significant and unavoidable impacts, while achieving most basic Plan objectives.

The commenter questions whether the EIR adequately evaluated alternatives would reduce the overall development intensity, retain a larger portion of employment-focused land uses, and modify the residential component to reduce transportation and compatibility impacts. Of the four alternatives carried forward for detailed evaluation, two would reduce the overall development density (No Project, Existing Plans Alternative and Reduced Criteria Pollutant Emissions Alternative).

As described on page 316 of the Draft EIR, an All Employment Alternative was considered but rejected. As described in the Draft EIR, the significant impacts identified for the project are not attributable to the inclusion of housing. Under this alternative, overall development intensity would remain generally similar to that of the Plan; therefore, it would not avoid or substantially lessen any of the significant environmental impacts identified. In addition, this alternative would not meet one

of the project's fundamental objectives, which is to introduce housing within the Plan area to accommodate anticipated population growth in the City of San Carlos. The planned residential development also contributes toward meeting the City's Regional Housing Needs Allocation (RHNA) obligations in future planning cycles. Because this alternative would neither reduce significant impacts nor feasibly attain the basic objectives of the project, it was appropriately rejected from further consideration.

Lastly, the Draft EIR evaluated two alternatives that reduced the Plan's residential development intensity (No Project, Existing Plans Alternative and Reduced Criteria Pollutant Emissions Alternative). It is unclear why the comment suggests an alternative that would reduce "transportation and compatibility impacts." The Draft EIR did not identify any significant and unavoidable transportation or compatibility impacts arising from the planned residential uses.

While the comment raises concerns regarding the range of alternatives evaluated in the Draft EIR, the analysis in the Draft EIR, as clarified above, demonstrates that these concerns have been adequately addressed. Accordingly, no revisions to the Draft EIR are warranted.

Comment G.13: Conclusion

In summary, while the DEIR provides a useful starting point for environmental review, additional analysis and clarification are necessary to ensure compliance with CEQA and to allow meaningful public participation. The Final EIR should address the issues described above and provide substantial evidence supporting its conclusions regarding environmental impacts and mitigation effectiveness.

Response G.13: The comment is acknowledged and included in the record for the decision makers. The responses above demonstrate that the commenter's concerns have been adequately addressed. Accordingly, no revisions to the Draft EIR are warranted.

H. Laurie Berger, Silicon Valley Law Group (dated April 16, 2026)

Comment H.1: DISCUSSION

1. The Project Description is Incomplete

CEQA requires that an environmental impact report contain an accurate, stable and finite project description, and this is an indispensable prerequisite to a legally sufficient EIR. (See County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185,193 and 14 CCR 15124 which incorporates this requirement.) In Inyo, the court stated that without an accurate description on which to base the EIR's analysis, CEQA's objective of furthering public disclosure and informed environmental decision making is stymied. In San Joaquin Raptor/Wildlife Rescue Ctr. V. County of Stanislaus (1994) 27 Cal.

App. 4th 713, 720, the court said, “an accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.”

Section 2.4 of the DEIR sets forth the project description. Section 2.4 describes the Proposed Land Use and Zoning Districts (2.4.1); General Plan Text Amendments (2.4.2); Circulation Improvements (2.4.3); Parking (2.4.4); Utility Improvements (2.4.5); Resilience Improvements (2.4.6) Transportation Demand Management (2.4.7); and Sustainable Design Features (2.4.8).

The Circulation Improvements is most relevant to the issues impacting Bragato LLC.

Bragato Extension

Page 17 of the DEIR describes the Bragato Extension. This proposed extension will extend Bragato Road so that it will connect to Quarry Road, thereby adding another north/south road. However, the DEIR does not explain how this new road will be constructed. The description does not explain how it will impact the existing properties surrounding the new road. There is no discussion of the dimensions of the road and required setbacks, and there is no discussion as to how the City would acquire any property necessary for the construction of the road. This new road appears to directly abut the Bragato Property. The impacts of the construction of the road are not addressed in the DEIR. The Project Description needs to address the mechanism for how the City could install this additional road.

Response H.1: The EIR is programmatic in nature and no specific development project is proposed at this time, including the extension of Bragato Road. The Plan envisions that Bragato Road would be extended to Quarry Road. The conceptual roadway section, including dimensions and setbacks, is shown on Figure 2.4-6 of the Draft EIR. Since specific details about the construction of the road, including the manner in which property would be acquired, are not known at this time, it would be speculative for the Draft EIR to evaluate impacts from construction of the envisioned roadway extension. As stated in the EIR, 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. For these reasons, no revisions to the Draft EIR are warranted.

Comment H.2: The Bragato Paseo

Bragato LLC purchased the Bragato Property in 2021 for use as a Honda Dealership. Bragato has worked extensively with the City of San Carlos Planning and Building Departments to build the dealership. In doing so, they have spent millions of dollars to transform a blighted industrial property into an attractive, state-of-the-art dealership that benefits the community.

The proposed Bragato Paseo as depicted in the DEIR and as described in the Plan, is a 36-foot-wide pedestrian walkway on the Bragato Property connecting Bragato Road to Industrial Road. This paseo would transect the Bragato property, and there is no discussion of this in the Project Description. Although the figures depicting the paseo may not be to scale, there is nowhere on the

Bragato Property where this paseo could be built.

The DEIR contains several figures depicting the proposed Bragato Paseo, and in Section 2.4.3.2 there is a brief description of three paseos, but these descriptions do not provide enough information to allow for informed environmental decision making.

The only substantive description of the paseo is:

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.

The Bragato Paseo, as depicted, runs right through the Bragato Property. If the paseo is to be installed on the north end of Bragato Property, it is proposed where the newly built Honda Dealership is located. In the current configuration, the northern part of Bragato Property is an active work zone and fire lane. Cars are continually being parked and moved in this area. This area is in the back of the dealership, it is not customer-facing, and it is not safe for pedestrians or cyclists. Furthermore, directly to the north on the adjacent property there is a utility ditch with an easement.

The paseo cannot be built here. The DEIR does not adequately analyze the foreseeable environmental impacts to the existing buildings that would be affected by implementation of the Project. The Project Description does not explain what buildings would be demolished, how the property would be acquired (eminent domain?), or the impact of the utility easement. Decisionmakers cannot properly evaluate the environmental impacts without knowing if the construction is even possible, or without knowing what would happen to existing structures. Any acquisition will cause physical changes to the environment that need to be considered in the DEIR.

Response H.2: The EIR is programmatic in nature, and no specific development project is proposed at this time. The Plan envisions that development, including the proposed paseos, would occur over a 20-year period. Specific details about demolition and construction are not known at this time and would be speculative for the Draft EIR to evaluate. The Draft EIR evaluates full implementation of the Plan, which includes redevelopment of the Bragato site consistent with the proposed land use designation, and is assumed to also include the paseo. 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. Also, the City anticipates implementation of the paseos through redevelopment over time and does not anticipate imposing implementation of paseos on existing uses. For these reasons, no revisions to the Draft EIR are warranted.

Comment H.3: In addition to the fact that there is a newly renovated Honda Dealer on the Bragato Property, there are also environmental considerations that were not described in the Project Description. The Bragato Property is impacted by a decades-old release of polychlorinated biphenyls (“PCBs”) originating from a neighboring property. The U.S. EPA required the installation of a six-inch engineered asphalt cap to contain the PCBs. U.S. EPA has exclusive jurisdiction over the regulation of PCBs. Therefore, the City has no legal authority to build the Project insofar as the Project contemplates construction in the area under U.S. EPA’s exclusive jurisdiction.

This cap was installed by Bragato LLC in 2021-2022 in accordance with the requirements of the federal Toxic Substances Control Act (“TSCA”). This cap (“TSCA Cap”) may not be breached or modified without the approval of the U.S. EPA and is subject to a forthcoming Soil Management and Operation and Maintenance Plan and Land Use Covenant that will ensure the integrity of the cap. These documents are not yet finalized, but they are critical to an understanding of how the Bragato Property may be developed.

The DEIR needs to contain a discussion of the TSCA Cap and the U.S. EPA’s oversight in the Project Description. The DEIR must be revised to fully and accurately reflect the existing environmental conditions which the Project intends to overlay so that future decisions will be based on actual conditions.

The Bragato Paseo cannot be constructed as proposed. It cannot be built where the Honda Dealership is, and it cannot be built near or on the TSCA cap. The Project Description must be revised to analyze these issues. Without a discussion of the real-world challenges associated with building the Project on a property with existing buildings and a TSCA Cap, the Project Description is flawed.

Response H.3: No specific project is proposed on the 494 Bragato Road property. The Draft EIR evaluates full implementation of the Plan, which includes redevelopment of the Bragato site consistent with the proposed land use designation, and is assumed to also include the paseo. The commenter’s claim that a specific improvement cannot be built on a particular property does not make the Draft EIR deficient. CEQA allows a program-level EIR to analyze conceptual improvements and their reasonably foreseeable environmental effects. Detailed feasibility and site-specific design will be addressed during subsequent project-level review. Therefore, the Draft EIR appropriately evaluates the Plan’s environmental impacts at the program level. For these reasons, no revisions to the Draft EIR are warranted.

Refer to response H.4 below for additional information related to hazardous materials.

Comment H.4: 2. The Hazards & Hazardous Materials Impacts are Not Properly Evaluated

The DEIR relies on the 2023 Cornerstone Screening Level Environmental Assessment (“EA”). This report is three years old and does not reflect current conditions. Importantly, the EA does not describe the TSCA Cap on the Bragato Property. At the outset, we do want to acknowledge that we understand how the EA and DEIR may have missed this important part of the environmental condition of the properties. Although sites regulated by local agencies and the Regional Water Quality Control Boards are readily accessible through Geotracker, and sites regulated by the Department of Toxic Substances Control are readily accessible through Envirostor, U.S. EPA TSCA sites are not publicly accessible via a similar public website. So, missing this important issue is understandable.

Given that there was no disclosure of the TSCA Cap, unsurprisingly, there is no analysis of the TSCA Cap. Any construction over the TSCA Cap will not be permitted without approval of U.S. EPA, and any construction and plans for this area need to consider the cap and the regulatory status of the properties, the costs, and enormous delays. The general mitigation measures do not account for the PCBs and regulatory status of the TSCA cap. The public and the decisionmakers need to be informed of the huge costs and delays a PCB cap alteration would entail. It is hard to believe these challenges could be overcome.

The DEIR should be amended to include an analysis of the requirement that U.S. EPA must be consulted before any development could occur that impacts the TSCA Cap. Any penetration of the TSCA Cap will require extensive efforts to ensure that potentially contaminated soil is properly handled and disposed of and that the surrounding community is protected. The DEIR relies on the Cornerstone Report attached as Appendix D, but that report fails to discuss the actual conditions at the Bragato Property.

Response H.4: A Screening Level Environmental Assessment (ESA) was prepared for the Plan and included as part of the Draft EIR as Appendix D. Given the programmatic nature of the Plan and the size of the Plan area (145 acres), a Screening Level ESA provides the appropriate level of documentation. It is neither practical nor feasible for the programmatic Draft EIR to evaluate and disclose conditions on all properties within the Plan area. The purpose of the Screening Level ESA is to provide a summary of the general environmental constraints and existing documented hazardous materials contamination. Table 3.9-1 on page 175 of the Draft EIR lists all known on-site sources of contamination in the Plan, including the property 495 Bragato Road. The Draft EIR acknowledges that the site is an Open Clean Up Program Site with potential contaminants of concern including polychlorinated biphenyls (PCBs), trichlorobenzenes (TCBs), petroleum, hydrocarbons, and volatile organic compounds (VOCs). As further explained on page 178 of the Draft EIR, at these parcels, characterization, monitoring and/or remediation activities are on-going and are being conducted under regulatory agency oversight. The Draft EIR goes on to explain on page 181 that 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. In accordance

with General Plan policies ESPS-5.3, ESPS-5.5 and ESPS-5.6, future development would be required to mitigate hazard exposure, prepare site-specific assessments, and be reviewed by appropriate regulatory agencies (when applicable).

Given the EIR is programmatic in nature and no specific development project is proposed at this time, the Draft EIR appropriately characterized known contamination at the 495 Bragato Road property. Any future redevelopment of this property would require subsequent site-specific environmental review including soil and groundwater evaluations in accordance with the City's General Plan policies. The Draft EIR has been revised to acknowledge the cap and the need for future coordination with the U.S. EPA (refer to Section 5.0 Text Revisions). The text revision does not constitute a "substantial revision" pursuant to CEQA Guidelines §15073.5 and recirculation of the EIR is not required.

Comment H.5: 3. The Air and Greenhouse Gases Impacts are Not Properly Evaluated

The DEIR evaluates the project's impacts to air and one of the transportation measures is:

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 DEIR says that the Plan would be consistent with the Bicycle and Pedestrian Master Plan in part because it 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." (DEIR, p. 67) The DEIR says in Table 3.3-5, that 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 (DEIR, p. 69).

Similarly, when evaluating the greenhouse gas impact, the DEIR looked at whether the project conflicts within applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. One of the reduction goals/applicable strategies is Strategy 12 "Active Transportation" which prioritizes bicycling and walking as safe, practical, and attractive travel options citywide, as directed by the Bicycle and Pedestrian Master Plan. (DEIR, p. 163). The DEIR finds that the Plan would include the pedestrian paseos described above and finds that future development would be consistent with the above strategies.

But because, as explained above, one of the paseos is impossible to build, a mitigation based on three completed paseos is an analytical error.

Response H.5: CEQA requires an evaluation of whether a project would conflict with applicable plans, policies, or regulations that would in turn result in significant environmental impacts. The Draft EIR properly evaluates the Plan's consistency with

the Bicycle and Pedestrian Master Plan and related active transportation strategies. The analysis identifies pedestrian and bicycle improvements, including the proposed paseos, and demonstrates that the Plan supports the goals and objectives of these plans. Even if a specific paseo cannot be implemented, this does not, by itself, create a CEQA conflict or environmental impact. The Draft EIR evaluates, at a programmatic level, the environmental impacts of implementing the Plan, and not the feasibility of implementing specific aspects of the Plan, such as the noted paseo. The comment does not provide any substantial evidence demonstrating that the Plan would, in fact, result in a conflict or significant environmental impact. Therefore, the Draft EIR's conclusions regarding consistency with applicable plans and greenhouse gas reduction strategies are accurate and defensible.

Comment H.6: 4. The Land Use and Planning Impact are Not Properly Evaluated

When analyzing whether the Project would divide an established community, the DEIR says that one of the primary objectives of the Plan is to improve mobility throughout the Plan area through the creation and enhancement of connections to transit, pedestrian and bicycle facilities. The DEIR again states that the three pedestrian paseos would facilitate more connectivity and accessibility in the district. As explained above, this is not possible and so the analysis of the connectivity and accessibility is incorrect.

Response H.6: CEQA requires an evaluation of whether a project would physically divide an established community or otherwise impede access. The Draft EIR demonstrates that one of the Plan's primary objectives is to enhance mobility and connectivity throughout the Plan area by improving pedestrian, bicycle, and transit linkages. The proposed pedestrian paseos, roadway connections, and other circulation improvements are envisioned to increase access within and across the Plan area, thereby supporting the conclusion that the Plan would not physically divide the community. Therefore, the Draft EIR's conclusion regarding community connectivity and accessibility is accurate, as it is based on what the Plan proposes, and defensible and the comment does not provide any substantial evidence that the Plan would result in a significant land use impact.

Comment H.7: 5. The Transportation Impacts are not Properly Evaluated

The DEIR also relies on the paseos as potentially mitigating transportation impacts. The DEIR analyzed whether the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. (DEIR, p. 272) The DEIR again states the Plan would be consistent with the Bicycle and Pedestrian Master Plan and relies on the paseos.

As described in detail above, the DEIR is assuming the paseos could be built however it does not discuss the existing TSCA Cap which would prevent a paseo from being built between Bragato Road and Industrial Road. The DEIR cannot rely on paseos that cannot be built.

Response H.7: CEQA requires analysis of whether a project, as proposed, would conflict with applicable plans, policies, or ordinances related to the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. The Draft EIR evaluates, at a programmatic level, the environmental impacts of implementing the Plan, and not the feasibility of implementing specific aspects of the Plan, such as the noted paseo. The Draft EIR evaluates the Specific Plan’s proposed bicycle and pedestrian improvements and concludes there would be no conflict. The absence of these improvements would not, by itself, create a CEQA impact. Therefore, the analysis appropriately addresses the relevant CEQA question and reasonably concludes that the Plan would not conflict with any applicable circulation-related policies. Refer also to responses H.3 and H4.

Comment H.8: 6. The DEIR is a Program Level and limited Project Level environmental review that must accurately describe the environmental impacts

The DEIR provides both program-and limited project-level environmental review for the Plan. As stated in the DEIR, the DEIR will allow for streamlined environmental review of subsequent development projects consistent with the Plan and analysis in the DEIR. 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 requires that an EIR delineate the environmental conditions that exist at the time of the project to establish a baseline against which the projects’ impacts may be assessed. *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal. App. 5th 413, 440. If the description of the environmental setting is incomplete or inadequate, the EIR is legally inadequate as it fails to comply with Code Regs., tit. 14, § 15125(a). *Cleveland ; Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74.

If a program EIR fails to address known environmental conditions, impacts related to those conditions may escape analysis in subsequent, project specific environmental reviews. For that reason, CEQA requires that known impacts must be analyzed at the program level to avoid omission in future reviews. (See *Cleveland* at 440 where the court stated that unaddressed impacts in a program EIR could evade scrutiny in later-tiered EIRs undermining CEQA’s objectives.)

Because the environmental setting normally supplies the baseline for significance determinations, a program EIR that does not fully address site condition risks fails to establish the baseline against which impacts are described and quantified. *Cleveland, supra*. Where the environmental setting is inaccurate, incomplete, or misleading, an EIR does not comply with CEQA and cannot be found to have adequately investigated and discussed environmental impacts. *Cadiz* at 87.

For these reasons, it is especially important that the DEIR adequately address the environmental conditions at the site.

Response H.8: The commenter suggests that the Draft EIR may lack adequate baseline information, such as site-specific conditions.

A program-level EIR is specifically designed to evaluate the broad, cumulative, and long-term effects of a plan or program, rather than project-specific impacts, particularly those pertaining to specific conditions on properties within the Plan. CEQA Guidelines Section 15168 recognizes that a program EIR may be prepared for a series of actions that are related either geographically, as logical parts of a chain of contemplated actions, or as parts of a plan. For a Specific Plan with a 20-year buildout horizon, a program EIR is an appropriate and defensible approach because it allows for the assessment of overarching environmental issues, cumulative effects, and mitigation strategies while deferring detailed, site-specific analyses to subsequent project-level review as appropriate.

To the extent practicable for a 145-acre Specific Plan area covering multiple private properties for which the City did not have access, the Draft EIR identifies existing conditions to establish a baseline for analysis, consistent with CEQA Guidelines Section 15125. For example, Section 3.9 of the Draft EIR (Hazards and Hazardous Materials) identifies all known sites within the Plan area that have documented contamination. Similarly, other sections of the Draft EIR summarize existing land use, biological resources, water quality, traffic conditions, and other relevant environmental factors. While program-level EIRs necessarily address conditions at a broader scale, the analysis provides a reasonable and adequate baseline from which to evaluate the environmental effects of the proposed Specific Plan and inform subsequent project-level review, at which point the then-current environmental conditions on a given site would be determined, and appropriate mitigation measures contained in the Draft EIR would be implemented for a given project.

For these reasons, the Draft EIR's program-level approach covering the large geographic area of the Specific Plan is appropriate for a 20-year buildout horizon, and it provides a defensible baseline analysis that is sufficient for evaluating the Plan's potential environmental effects. More detailed site-specific conditions will be addressed at a project level for each development project implementing the Plan, as required under CEQA. Further, the Plan incorporates General Plan policies and Specific Plan Requirements that would ensure that future development evaluates site-specific issues.

Comment H.9: CONCLUSION

We respectfully request, as a CEQA matter, that the City revise the DEIR, respond to our comments in the administrative record, and ensure CEQA compliance before approving the final EIR. More importantly, it is clear the drafters were not aware of the environmental regulatory challenges involved in proposing a paseo through a federally regulatory PCB capped site. The concept of the Bragato Paseo should be abandoned.

Response H.9: The comment is acknowledged. Refer to responses H.1 through H.8 above.

Section 5.0 Draft EIR Text Revisions

This section contains revisions to the text of the Northeast Area Specific Plan Draft EIR dated March 2026. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page 11 REPLACE Figure 2.4-1: Proposed General Plan Land Use Designations

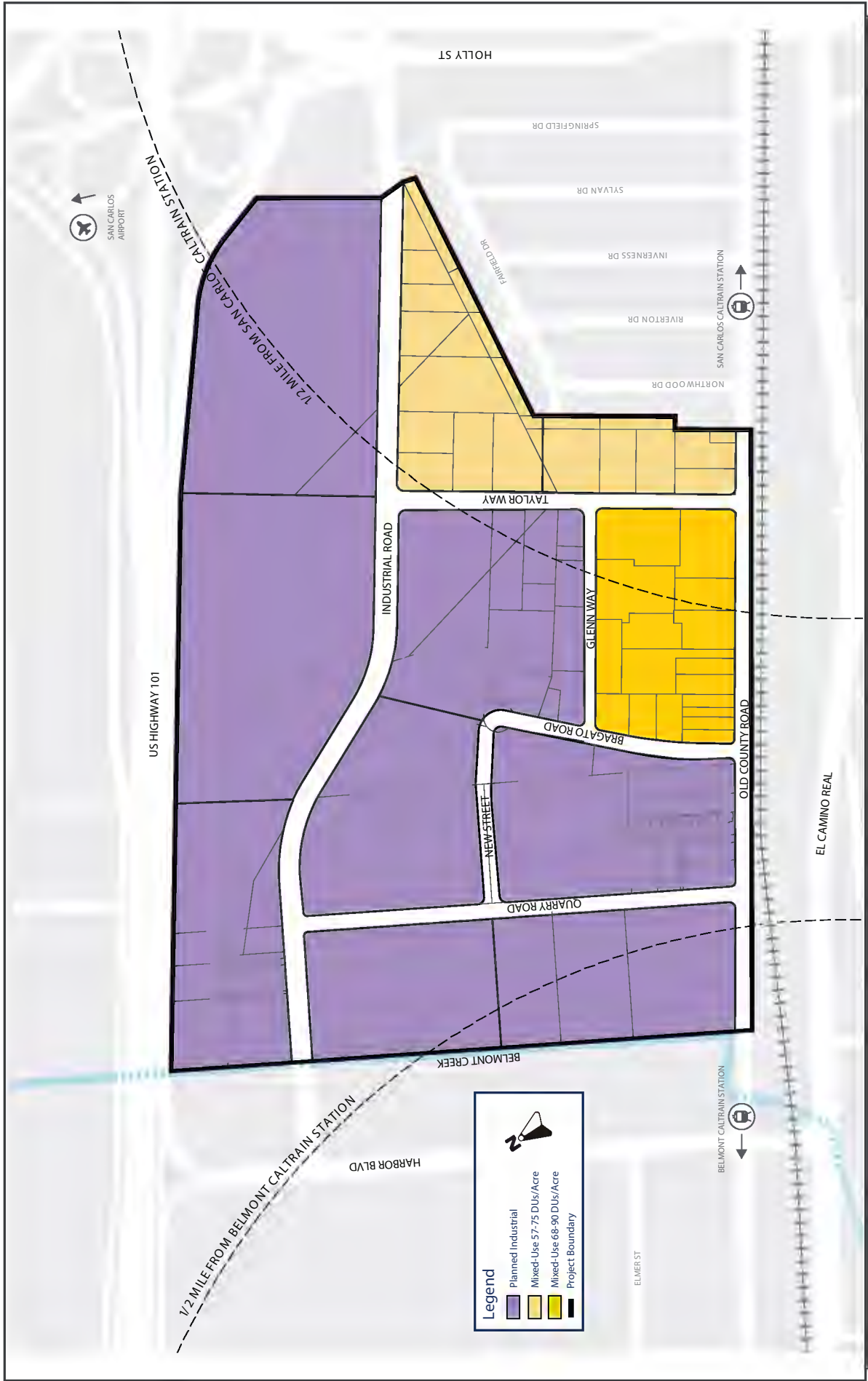


FIGURE 2.4-1

PROPOSED LAND USE DESIGNATIONS

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). ⁹
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Health Risk ~~Project~~ Assessment Requirements

- ~~Health Risk Assessments.~~ Applicants proposing development of projects 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 submit prepare a site-specific construction and operational health risk assessment (HRA) prior to project planning application 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 incorporated to further reduce risks to the greatest extent practicable and to the satisfaction of the City.

Toxic Air Contaminant ~~Project~~ Requirements

- Projects ~~developed within the Plan that are~~ affected by air pollutant or toxic air contaminant (TAC) sources (shown on Figure 3.3-1) shall implement appropriate measures to minimize exposure to long-term TAC and annual PM_{2.5} particulate matter with a diameter of 2.5 micros or less (PM_{2.5}).~~exposure for new~~ to project occupants. Projects shall include either measures to reduce long-term exposure to TAC and PM_{2.5}, 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 µg/m³ from any single source or

⁹ All new development within the Northeast Area shall adhere to One Shoreline definition of Sea Level Rise Base Flood Elevation (SLR-BFE). SLR-BFE is defined as 3 feet above the project site's Base Flood Elevation (BFE) on the FEMA Flood Insurance Rate Map in effect at the time of the Application Date. Where no BFE exists, the SLR-BFE shall be at least 3 feet above the existing grade. If the site is sloped, the average existing grade shall be used.

0.8 $\mu\text{g}/\text{m}^3$ 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 projects ~~developments~~ to limit exposure from sources of TACs and fine particulate matter ($\text{PM}_{2.5}$) emissions.
- Install air filtration at units that have predicted cancer risk levels above 10 ~~chances~~ cases per million and $\text{PM}_{2.5}$ concentrations above 0.3 $\mu\text{g}/\text{m}^3$. 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 $\text{PM}_{2.5}$ concentrations below 0.3 $\mu\text{g}/\text{m}^3$ from any source to the satisfaction of the City.

Page 102 Special-Status Species Project Requirements: REVISE as follows:

Special-Status Species Project Requirements Migratory Bird Requirements

- **Avoid Nesting-Season Construction if Feasible.** To the extent feasible, demolition and construction activities for sites containing trees 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~~ biologist shall submit a report indicating the results of the survey and any designated buffer zones to the satisfaction of the City's Planning Division 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.

Page 104 Roosting Bat Project Requirements: REVISE as follows:

Roosting Bat Project Requirements

Consistent with General Plan Policy EM-1.2, if buildings identified shown as “Currently Suitable” and buildings identified as “Potentially Suitable if Building is Unoccupied” on Figure 3.4-2 are proposed to demolished or remodeled, the following Specific Plan Project Requirements pertaining to special-status roosting bats shall be implemented. Remodels could also result in such impacts if they affect areas where bats are present or if they block ingress or egress to roost sites. Remodels 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.

- **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 satisfaction of the City’s Planning Division 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.

- **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.

Page 109 Artificial Lighting Project Requirements: REVISE as follows:

Artificial Lighting Project Requirements

- The following measures will be implemented during any renovation or redevelopment under the Plan adjacent to Belmont Creek and other areas mapped as riparian, freshwater marsh, and aquatic riverine as shown on Figure 3.4-1 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.

~~Bird Collision Project Requirements~~ **Bird Safe Design Requirements**

- ~~Projects~~ Renovation and redevelopment under the Plan shall implement the following bird-safe building design considerations for all buildings exceeding 40 feet above finished grade 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 deviation 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 decision must be approved by the City's Planning Division.

Table 3:5-1: Historic Period Buildings in the Plan under the property at 151 Industrial Road, the year built will be revised as follows:

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 <u>1997</u>	49 <u>29</u>	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)

Address	APN	Year Built	Age	Building Type
181 Industrial Road	046-020-300	1956	67	Industrial (warehouse)
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)

Address	APN	Year Built	Age	Building Type
239 Old County Road	046-053-080	1958	65	Industrial (warehouse and shop)
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)

Address	APN	Year Built	Age	Building Type
611 Taylor Way	046-054-130 and 046-054-510	1977	46	Industrial (warehouse) and parking lot
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)

Page 178 Section 3.9.1.2 Existing Conditions under On-Site Sources of Contamination: ADD the following paragraph:

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.

As shown in Table 3.9-1, the property at 495 Bragato Road (Map Id. 38) has potential contaminants of concern including PCBs, TCBs, petroleum hydrocarbons, and VOCs. A cap was installed on the property between 2021 and 2022 in accordance with the requirements of the TSCA and under the authority and oversight of the EPA. A Land Use Covenant will be established to ensure the integrity of the cap.

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.

Page 199 Resiliency Project Requirements: REVISE as follows:

Resiliency Project Requirements:Flood Resiliency 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 base flood elevation (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).

Page 236 Vibration Control Project Requirements: REVISE as follows:

Vibration Control ~~Project~~ Requirements:

- Projects shall submit 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:
 - Submit 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.

Page 241 Under Vibration Control Measure Project Requirements: REVISE as follows:

Vibration Control ~~Measure~~ Project Requirement:

- ~~Projects incorporating~~ ~~Based on the setback distances presented in~~ ~~Error!~~ ~~Reference source~~ ~~not found,~~ project-specific vibration analyses shall be prepared for residential buildings ~~uses~~ proposed along Old County Road within 75 feet of the nearest Caltrain track and for buildings with interiors sensitive to vibration (e.g., research labs) that are within 335 feet of the nearest Caltrain track shall submit project-specific vibration analyses. These ~~studies~~ ~~should~~ analyses shall include vibration measurements at the project sites and comparisons of the measurements to the established ~~FTA~~ Federal Transit Administration standards in order to verify vibration and land use compatibility consistent with 2030 General Noise Element (as amended by the 2045 General Plan Reset Project) Policies NOI-1.7 and NOI-1.14.

Appendix A: Draft EIR Comment Letters
