

**275 Industrial Road
PG&E San Carlos Service Center Project**

Initial Study / Mitigated Negative Declaration



City of San Carlos
600 Elm Street, San Carlos, CA 94070

November 2024

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275 Industrial Road PG&E Service Center Project Draft Mitigated Negative Declaration

Project: 275 Industrial Road PG&E Service Center Project

Project Proponent: Boris Letuchy, Pacific Gas & Electric Company
77 Beale Street
San Francisco, CA 94105

Lead Agency: City of San Carlos

Availability of Documents: The Initial Study for this Mitigated Negative Declaration is available for review at:

City of San Carlos
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PROJECT DESCRIPTION

The City of San Carlos has received an application for the 275 Industrial Road PG&E Service Center Project (project), which involves updating the Master Plan for the existing PG&E San Carlos service center. The updated Master Plan proposes the following changes to the main on-site facilities:

- Demolish the existing, 9,534-square-foot Shops building and replace it with a 52,000-square-foot single-story Logistics Warehouse & Shops building consisting of shops and enclosed warehouse space, and another 7,250 sq. ft. of unconditioned covered storage for a total of approximately 59,250 sq. ft.
- Demolish the existing 7,979-square-foot Fleet Maintenance building and replace it with a new 20,000-square-foot, single-story Fleet Maintenance building used to maintain and repair PG&E service vehicles, and another 2,030 sq. ft. of covered fleet storage for a total of approximately 22,030 sq. ft.
- Renovate the existing, approximately 57,400-square-foot Operations building, which is a two-story building that serves primarily office and meeting room uses.
- Construct a new, single-story Material storage building with 2,160 square feet of building area. An approximately 3,500 sq. ft. curbed material storage canopy area would be located adjacent to the new building.

The updated Master Plan also proposes the replacement and reconfiguration of parking lots, replacement of concrete and asphalt not associated with parking lots, removal of existing trees and replanting of trees and other landscaping improvements, construction of bioretention areas for capture and pre-treatment of stormwater runoff, removal or rerouting of some existing utilities and installation of new utilities, installation of new lighting fixtures and signage, and installation of photovoltaic panels in the replaced employee parking lot. The San Carlos Service Center currently serves large portions of San Mateo and Santa Clara counties and acts as main hub for emergency services for the greater region for gas & electric utility service needs.

The project site is located at 275 Industrial Road, in the northern portion of the City of San Carlos, on a single parcel (Assessor Parcel Number (APN) 046-051-999). The project site is located within the City's Northeast Specific Plan Study area. There is currently increased interest in transitioning this area from low-intensity commercial and industrial businesses to biotechnology, life sciences, and high-tech office land uses. The Northeast Specific Plan Study is currently underway.

In the immediate vicinity of the project site, Highway 101 borders the site to the northeast, a multi-tenant life science building, including laboratory testing facilities, borders the site to the northwest, Sutter Health Urgent Care-San Carlos Center and Palo Alto Medical Foundation Laboratory border the site to the southeast, and Industrial Road borders the site to the west/southwest. Open drainage ditches are located along the site perimeter on the north, east, and south sides.

The project site has a General Plan and zoning designation of Planned Industrial and Industrial Professional (IP) respectively. These General Plan and zoning designations generally include research and development, bio-tech, light industrial, flex, warehousing and related uses.

The applicant proposes to complete the Master Plan in phases, commencing in early 2025. Tentative estimates from the project applicant indicate the final phase of the Master Plan, the Operations building renovations, would end in 2029. Construction would require the demolition of multiple on-site buildings and associated site features, including pavements, resulting in the net off-haul of approximately 2,138 CY of soil.

In total, the project proposes approximately 175,951 sq. ft., or 21.9 percent, of lot coverage. This total lot coverage includes 140,680 sq. ft. of total building area and 35,271 sq. ft. of non-occupied structure space. Of the proposed total building area, 133,450 sq. ft. would be considered an occupied area for the purpose of calculating the project's proposed floor area ratio (FAR). Approximately 112,578 sq. ft., or 14.1 percent of the site, would be landscaping, including bioretention areas and flow-through planters. The remainder of the site would consist of hardscape in the parking lots, driveways, drive aisles, and internal vehicular circulation routes, pathways, sidewalks, and open materials storage areas. The site's proposed FAR would be 0.166. The site would provide parking for approximately 537 motor vehicles, which would be used primarily by fleet service vehicles and employee passenger vehicles, and 27 bicycles. Vehicular access to the site would continue to be provided by eight driveways that run along the western portion of the project site and connect to Industrial Road.

The design of the new Logistics Warehouse & Shops building and Fleet building, and the renovated Operations building, would incorporate wood decor and fiber cement for exterior sidings. The buildings would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing. The main entrance of the Operations building would have an offset glazed system storefront.

The project would result in a total of 112,578 sq. ft. of on-site landscaping, or 14.1 percent of the site. Implementation of the proposed project would increase the amount of pervious area on the site by approximately 0.58 acres (25,312 sq. ft.).

PROPOSED FINDINGS

The City of San Carlos has reviewed the attached Initial Study and determined that the Initial Study identifies potentially significant project effects, but:

1. Revisions to the project plans incorporated herein as mitigation would avoid or mitigate the effects to a point where no significant effects would occur; and

2. There is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment. Pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15064(f)(3) and 15070(b), a Mitigated Negative Declaration has been prepared for consideration as the appropriate CEQA document for the project.

BASIS OF FINDINGS

Based on the environmental evaluation presented in the attached Initial Study, the project would not cause significant adverse effects related to: aesthetics, agricultural and forestry resources, air quality, energy, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, utilities/service systems, and wildfire. With mitigation incorporated into the project, the project does not have impacts that are individually limited, but cumulatively considerable.

The environmental evaluation has determined that the project would have potentially significant impacts on biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources as described below.

Mitigation Measures

The project could result in significant adverse effects on biological resources, cultural resources, geology and soils, hazards and hazardous materials, noise, and tribal cultural resources. However, the project has been revised to include the mitigation measures listed below, which reduce these impacts to a less-than-significant level. With implementation of these mitigation measures, the project would not substantially degrade the quality of the environment, reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Nor would the project cause substantial adverse effects on humans, either directly or indirectly.

Impact BIO-1: The proposed project could impact nesting birds if project activities are initiated during the nesting season.

Mitigation Measure BIO-1: Avoid Impacts to Nesting Birds. To avoid impacts to nesting birds and avoid potential violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (that is, from September 16 to January 31). If construction and construction noise occurs within the avian breeding season (February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented.

If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist, until the chicks have fledged. If the qualified biologist determines that construction-free buffer zones can be reduced without disturbing the nest, a biological monitor shall be present during project activities to ensure compliance with Migratory

Bird Treaty Act (MBTA) and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.

Effectiveness: This measure will reduce impacts to nesting birds to less than significant.

Implementation: This measure will be implemented by the Applicant or its contractor.

Timing: Prior to project construction.

Monitoring: A nesting bird survey report shall be submitted to the City to verify the results of the pre-construction survey.

Impact CUL-1: Project construction personnel may not recognize buried archaeological resources during project demolition and construction.

Mitigation Measure CUL-1: Conduct Archaeological Sensitivity Training. In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance.

The training shall include suitable photographic materials showing the kinds of artifacts and evidence of prehistoric archaeological sites likely to be found in the area, as well as written and verbal descriptions for archaeological resources and signs of potential archaeological discovery. The training will also include written materials describing what to do in the event of a discovery, or suspected discovery of an archaeological resource.

Effectiveness: This measure would minimize and/or avoid impacts to undiscovered archaeological resources, reducing potential impacts to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure prior to ground disturbance on the site.

Timing: Prior to project ground disturbance.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. The City shall ensure that archaeological training has been conducted for all personnel engaged in ground moving activities, prior to ground disturbance on the site.

Impact CUL-2: Project construction may unearth or disturb previously unidentified buried archaeological resources during project demolition and construction.

Mitigation Measure CUL-2: Protection of Archaeological Resources. In the event archaeological resources are unearthed during ground-disturbing activities, all ground-disturbing activities within 100 feet of the find shall be halted so that the find can be evaluated. Ground moving activities shall not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find.

All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards.

All Native American artifacts (tribal finds) shall be considered significant Tribal Cultural Resources, pursuant to PRC 21074, until the lead agency has enough evidence to make a determination of significance.

The City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. If appropriate, the archaeologist may introduce archaeological monitoring on all or part of the site. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.

Effectiveness: This measure would minimize and/or avoid impacts on undiscovered archaeological resources, reducing potential impacts to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event cultural resources are discovered.

Timing: During all earth moving phases of project construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. An archaeological report, if appropriate, will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center

Impact CUL-3: Construction activities, particularly excavation and trenching, may disturb human remains during project demolition and construction.

Mitigation Measure CUL-3: Protection of Human Remains. If human remains are unearthed during ground-disturbing activities, Section 7050.5(b) of the California Health and Safety code will be implemented. Section 7050.5(b) states:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

The County Coroner, upon recognizing the remains as being of Native American origin, is responsible to contact the Native American Heritage Commission (NAHC) within 24 hours. The Commission has various powers and duties, including the appointment of a Most Likely Descendant (MLD) to the Project. The MLD, or in lieu of the MLD, the NAHC, has the responsibility to provide guidance as to the ultimate disposition of any Native American remains.

Effectiveness: This measure would reduce impacts on previously unknown human remains to less than significant levels.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event human remains are discovered.

Timing: During all earth moving phases of project construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. The County Coroner will detail the findings in a coroner's report.

Impact GEO-1: Project demolition and construction could unearth paleontological resources, including fossils.

Mitigation Measure GEO-1: Protection of Paleontological Resources. If paleontological resources are discovered during construction, ground-disturbing activities shall halt immediately until a qualified paleontologist can assess the significance of the discovery. Depending on determinations made by the paleontologist, work may either be allowed to continue once the discovery has been recorded, or if recommended by the paleontologist, recovery of the resource may be required, in which ground-disturbing activity within the area of the find will be temporarily halted until the resource is recovered. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines and current professional standards.

Effectiveness: This measure would reduce impacts to paleontological resources to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event any paleontological resources are discovered.

Timing: During all earth moving phases of project demolition and construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of paleontological mitigation. If paleontological resources are uncovered, a report shall be prepared by the qualified paleontologist describing the find and its deposition.

Impact HAZ-1: The project site may be contributing to PCB contamination found in adjacent drainages.

Mitigation Measure HAZ-1: Conduct Soil and Stormwater Sampling. Prior to any project construction, PG&E will coordinate with the City and the San Mateo Countywide Water Pollution Prevention Program to allow soil and stormwater runoff samples to be collected on the Service Center property consistent with the requirements of the Municipal Regional Permit Order No. R2-2022-0018, NPDES Permit No. CAS612008, issued May 11, 2022. The sampling will be conducted by the San Mateo Countywide Water Pollution Prevention Program and their agents to ensure required Program sampling protocols are followed. The samples shall be collected before any construction activities begin. The City of San Carlos will facilitate the coordination with the San Mateo Countywide Water Pollution Prevention Program for scheduling the sample collection.

Should the San Mateo Countywide Water Pollution Prevention Program testing indicate there are PCBs present in on-site soil or stormwater samples above regulatory thresholds, PG&E shall prepare a PCB clean-up and remediation work program to the satisfaction of the Regional

Water Quality Control Board, the San Mateo County Health Department, and the San Mateo Countywide Water Pollution Prevention Program, and consistent with all requirements of the Municipal Regional Permit Order No. R2-2022-0018, NPDES Permit No. CAS612008, issued May 11, 2022. All remediation work shall be completed prior to issuance by the City of any building or grading permits.

- Effectiveness:** This measure would provide further information for the San Mateo Countywide Water Pollution Prevention Program in the detection of potential sources of PCBs in drainage ditch sediment adjacent to the PG&E site.
- Implementation:** The City shall facilitate the scheduling of the sampling collection with PG&E and the San Mateo Countywide Water Pollution Prevention Program.
- Timing:** The samples shall be collected prior to any project construction activities.
- Monitoring:** The City shall ensure this measure is implemented prior to issuing any permits authorizing the start of construction.

Impact HAZ-2: The reported concentrations of arsenic in soils and TPH, VOCs, and SVOCs in groundwater on site could pose a significant hazard to contractors and project employees, and the environment.

Mitigation Measure HAZ-2: Prepare Soil and Groundwater Management Plan. Prior to issuing building permits for the proposed project, the City shall require the project Applicant to submit a soil and groundwater management plan (SGMP), prepared by a qualified firm or individual, to the City and San Mateo County Environmental Health Department (SMCEHD). SMCEHD would be responsible for approving the SGMP. The SGMP shall include provisions for notifications to contractors, and subcontractors concerning §5194. Hazard Communication. The SGMP must include a provision requiring the disclosure of the on-site soil analytical results to the selected receiving facility that may accept exported soil from the site should export to a licensed receiving facility become necessary.

- Effectiveness:** This measure would require the Applicant to submit a SGMP per the recommendations of the LSI and to satisfy SMCEHD requirements.
- Implementation:** The Applicant shall be responsible for preparing and submitting the SGMP as part of its building permit application.
- Timing:** Prior to the issuance of building permits for the proposed redevelopment activities.
- Monitoring:** The SMCEHD shall verify the SGMP complies with regulatory standards for soil and groundwater management plans.

Impact HAZ-3: The existing on-site buildings have not been evaluated for ACMs, LBP, or PCBs, the presence of which could pose a significant hazard to contractors during proposed demolition activities.

Mitigation Measure HAZ-3: Conduct Asbestos, Lead-Based Paint, and Polychlorinated Biphenyls Surveys. Prior to issuing demolition and building permits for the proposed project, the City and San Mateo County Health shall require the project Applicant to conduct and submit a visual inspection/pre-demolition survey, and possible sampling, prior to the demolition of on-

site buildings to determine the presence of ACMs, LBP, and PCBs. The following describes the type of testing that will be conducted at the site, consistent with existing regulations.

A visual inspection/pre-demolition survey, and possible sampling, will be conducted prior to the demolition of on-site buildings to determine the presence of ACMs and lead-based paint LBP.

- During demolition activities, all building materials containing lead-based paint would be removed in accordance with Cal/OSHA Lead in Title 8, California Code of Regulations (CCR), Section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.
- All potentially friable asbestos containing materials (ACMs) would be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities would be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, Section 1529, to protect workers from asbestos exposure.
- Materials containing more than one-percent asbestos would also be subject to BAAQMD regulations. Removal of materials containing more than one-percent asbestos would be required to be completed in accordance with BAAQMD requirements and notifications.
- Based on Cal/OSHA rules and regulations, the following conditions would be required to limit impacts to construction workers.
 - Prior to commencement of demolition activities, a building survey, including sampling and testing, would be completed to identify and quantify building materials containing lead-based paint.
 - During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, Section 1532.1, including employee training, employee air monitoring and dust control.
 - Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.

A protocol will be implemented for managing PCB-containing materials and waste during building demolition so that PCBs do not enter municipal separate storm sewer systems (MS4s). This protocol shall adhere to U.S. EPA guidelines for determining the presence of manufactured PCB products in buildings or other structures and conducting abatement efforts. This protocol shall be implemented consistent with MRP 3 (Orders No. R2-2022-0018 and R2-2023-0019) Provision C.12.g (Manage PCB-Containing Materials and Wastes During Building Demolition Activities). The protocol shall, at a minimum, include the following measures:

- Prior to issuing a demolition and building permit(s) for the project, the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), as the designated MRP Permittee, shall coordinate with the project proponent and demolition contractor to test all structures proposed for demolition for the presence of building materials containing PCBs.
- For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater, the SMCWPPP shall require the demolition contractor to provide notification to the SMCWPPP, the Water Board, and U.S. EPA at least one week before any demolition is to occur.

- For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater, the SMCWPPP shall verify that PCBs in demolished buildings are properly managed to minimize transport to the MS4 by obtaining official documentation that the building materials with PCBs concentrations of 50 ppm or greater in these demolished applicable structures were disposed appropriately according to state and federal regulations. Verification shall involve inspecting demolition sites monthly during demolition activities in the dry season (May – September) and requiring the demolition contractors to sweep the project sites and the streets around the property with street sweepers that will effectively remove sediment and dust.

Effectiveness: This measure would ensure that all regulations pertaining to the disposal of ACMs, LBP, and PCBs and Cal/OSHA and MRP requirements are met.

Implementation: The Applicant shall be responsible for preparing and submitting the ACMs/LBP visual inspection/pre-demolition survey, and possible sampling, and any subsequently required remediation plans as part of its building permit application. The Applicant shall, in coordination with the SMCWPPP, be responsible for preparing and submitting the PCBs pre-demolition survey and testing results, and any subsequently required remediation plans as part of its building permit application.

Timing: Prior to the issuance of demolition and building permits for the proposed redevelopment activities.

Monitoring: San Mateo County Health shall verify the visual inspection/pre-demolition survey, and possible sampling, and any subsequently required remediation plans comply with Cal/OSHA regulatory standards for ACM and LBP surveying, testing, and remediation. The SMCWPPP shall provide in its Annual Report to the San Francisco Bay Regional Water Quality Control Board the following: whether the project site was inspected during demolition and, if there are building materials with PCBs concentrations of 50 ppm or greater, the hazardous waste manifest prepared for transportation of the material to a disposal facility. Verification of the latter requirement may include the hazardous waste manifest prepared for transportation of the material to a disposal facility.

Impact NOI-1: The new generator proposed as part of the project is a stationary source of noise that could potentially conflict with the noise level standards identified in Table 9-1 of the City's General Plan Noise Element.

Mitigation Measure NOI-1: Prepare Acoustical Analysis for Emergency Back-Up Generator. Prior to issuing construction permits for the proposed back-up generator, the City shall require the project Applicant to submit an acoustical analysis to the City, prepared by a qualified firm or individual, that demonstrates sound levels generated by the emergency back-up generator is consistent and in compliance with the noise level limitations specified in Table 9-1 of the City's General Plan. The acoustical analysis shall identify, as necessary, any noise attenuating features (e.g., enclosures) required to achieve compliance with the City's noise level standards.

Effectiveness: This measure would require the Applicant to demonstrate the sound levels generated by the project's emergency backup generator comply with City standards.

- Implementation:** The Applicant shall be responsible for preparing and submitting the acoustical analysis as part of its building permit application.
- Timing:** Prior to the issuance of construction permits for the emergency back-up generator.
- Monitoring:** The City shall verify the acoustical analysis demonstrates the back-up generator complies with City noise level standards.

RECORD OF PROCEEDINGS AND CUSTODIAN OF DOCUMENTS

The record, upon which all findings and determinations related to the approval of the project are based, includes the following:

1. The Mitigated Negative Declaration and all documents referenced in or relied upon by the Mitigated Negative Declaration.
2. All information (including written evidence and testimony) provided by City of San Carlos staff to the decision maker(s) relating to the Mitigated Negative Declaration, the approvals, and the Project.
3. All information (including written evidence and testimony) presented to the City of San Carlos by the environmental consultant who prepared the Mitigated Negative Declaration or incorporated into reports presented to the City of San Carlos.
4. All information (including written evidence and testimony) presented to the City of San Carlos from other public agencies and members of the public related to the Project or the Mitigated Negative Declaration.
5. All applications, letters, testimony, and presentations relating to the Project.
6. All other documents composing the record pursuant to Public Resources Code section 21167.6 I.

The City of San Carlos is the custodian of the documents and other materials that constitute the record of the proceedings upon which the City of San Carlos's decisions are based. The contact for this material is:

City of San Carlos
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San Carlos, CA 94070

Contact: Chris Dacumos, Senior Planner
Phone: (707) 655-0370
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275 INDUSTRIAL ROAD PG&E SAN CARLOS SERVICE CENTER PROJECT INITIAL STUDY

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Chapter 1. Introduction

Pacific Gas and Electric (PG&E) owns and operates an 18.4-acre regional service center at 275 Industrial Road in the City of San Carlos (City or San Carlos) where PG&E parks service vehicles, stores materials needed for servicing the electric and natural gas infrastructure, provides maintenance to the service vehicles, and has an operations building with office uses. The main buildings at the service center were constructed in the 1970's and PG&E is now proposing to modernize the facility and construct environmental protection measures. This San Carlos Service Center currently serves the greater San Carlos area and acts as main hub for emergency services for the greater region for gas & electric utility service needs. The proposed modernization is critical for the San Carlos Service Center so that it can continue to support PG&E's efforts to maintain the public's utility infrastructure needs.

This Initial Study (IS) evaluates the potential environmental effects of replacing the existing PG&E San Carlos Service Center's aged Fleet Maintenance and Shops buildings with new buildings for more efficient storage of PG&E materials, tools, and equipment, to remodel the existing Operations building, to provide storm water runoff controls, protect buildings and materials storage areas from flood waters, and installing landscaping. This proposed activity constitutes a project under the California Environmental Quality Act (CEQA).

1.1 PROJECT BACKGROUND AND OVERVIEW

PG&E, the project applicant (Applicant), is proposing to replace the San Carlos Service Center's aged Fleet Maintenance and Shops buildings with new buildings for more efficient storage of PG&E materials, tools, and equipment, to remodel the existing Operations building, to provide environmental protection measures including storm water runoff controls, protect buildings and materials storage areas from flood waters, and installing landscaping.

The project site is located at 275 Industrial Road in the northern portion of the City of San Carlos, and is within the City's Northeast Specific Plan Area, an area that is transitioning from low-intensity commercial and industrial businesses to life science and biotechnology companies. In the immediate vicinity of the project site, Highway 101 borders the site to the northeast, a multi-tenant life science building, including a laboratory testing facility, borders the site to the northwest, and Sutter Health Urgent Care-San Carlos Center and Palo Alto Medical Foundation Laboratory border the site to the southeast. Across Industrial Road to the west and southwest are the following current facilities: Delta Star (transformer manufacturer), Advantage Converting (manufacturing), Honda San Carlos (vehicle service and parts), Anwita Biosciences (medical research). Single-family residences are located further south of the project site and the San Carlos Airport is located further southeast of the project site.

1.2 REGULATORY GUIDANCE

The California Environmental Quality Act (CEQA; Public Resources Code § 21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.) establish the City of San Carlos as the lead agency for the project. The lead agency is defined in CEQA Guidelines Section 15367 as, "the public agency which has the principal responsibility for carrying out or approving a project." The lead agency is responsible for preparing the appropriate environmental review document under CEQA. The San Carlos City Council serves as the decision-making body for the City and is responsible for adopting the CEQA document and approving the project.

CEQA Guidelines Section 15070 states a public agency shall prepare a proposed Negative Declaration or a Mitigated Negative Declaration when:

1. The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

2. The Initial Study identifies potentially significant effects, but:

- Revisions in the project plans made before a proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where no significant effects would occur, and
- There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Pursuant to Section 15070, the City has determined a Mitigated Negative Declaration is the appropriate environmental review document for the 275 Industrial Road PG&E Service Center Project.

To ensure that the mitigation measures and project revisions identified in a Mitigated Negative Declaration are implemented, CEQA Guidelines Section 15097(a) requires the City to adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.

1.3 LEAD AGENCY CONTACT INFORMATION

The lead agency for the project is the City of San Carlos. The contact person for the lead agency is:

Chris Dacumos, Senior Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070
Phone: (707) 655-0370
Email: cdacumos@goodcityco.com

1.4 DOCUMENT PURPOSE AND ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of the 275 Industrial Road PG&E Service Center Project. This document is organized as follows:

- Chapter 1 – Introduction. This chapter introduces the project and describes the purpose and organization of this document.
- Chapter 2 – Project Description. This chapter describes the project location, area, site, objectives, and characteristics.
- Chapter 3 – Environmental Checklist and Responses. This chapter contains the Environmental Checklist that identifies the significance of potential environmental impacts (by environmental issue) and a brief discussion of each impact resulting from implementation of the proposed project. This chapter also contains the Mandatory Findings of Significance.
- Chapter 4 – Report Preparation. This chapter provides a list of those involved in the preparation of this document.
- Appendices
 - Appendix A: Arborist Report
 - Appendix B: Air Quality Calculations
 - Appendix C: Special-Status Plant and Animal Species
 - Appendix D: Phase I ESA and Phase II ESA
 - Appendix E: Belmont Creek Flood Evaluation

Chapter 2. Project Description

The City of San Carlos has received an application for the 275 Industrial Road PG&E Service Center Project (project), which involves updating the Master Plan for the existing PG&E San Carlos Service Center. The updated Master Plan proposes replacing the San Carlos Service Center's aged Fleet Maintenance and Shops buildings with new buildings for more efficient storage of PG&E materials, tools, and equipment, to remodel the existing Operations building, to provide environmental protection measures including storm water runoff controls, protect buildings and materials storage areas from flood waters, and installing landscaping. The San Carlos service center currently serves the greater San Carlos area and acts as the main hub for emergency services for the greater region for gas & electric utility service needs.

2.1 PROJECT LOCATION

The project site is located at 275 Industrial Road in the northern portion of the City of San Carlos, California, in San Mateo County, along the San Francisco Peninsula, as shown in Figure 1 – Regional Location. San Carlos is bordered by the City of Belmont to the north, the San Francisco Bay to the east, Redwood City to the south, and the Pulgas Ridge Open Space Preserve, Edgewood Park and Natural Reserve, and other open space, and Interstate 280 (I-280) to the west.

Regional access to the project site is provided via United States Route 101 (Highway 101), which is an eight-lane freeway located immediately east/northeast of the project site. Access to the project site from Highway 101 is provided from the Holly Street and Harbor Boulevard exits. Local access to the project site is provided by Industrial Road, Holly Street, Old County Road, Harbor Boulevard, and State Route 82 (El Camino Real).

The project site is located approximately 8.7 miles southeast of San Francisco International Airport (SFO). San Carlos Airport is located approximately 0.33 miles to the southeast of the project site, and the San Carlos Caltrain station is approximately 0.51 miles to the south of the project site.

2.2 PROJECT SITE

The approximately 18.4-acre project site consists of a single parcel (Assessor Parcel Number 046-051-999) and is currently developed with approximately 70,710 square feet (sq. ft.) of building area within the existing PG&E Shops building, Fleet Maintenance building, Operations building, and accessory buildings as shown in Figure 2 – Project Vicinity. The project site is located in the eastern portion of the City's Northeast Specific Plan Area, an area that is transitioning from low-intensity commercial and industrial businesses to life science and biotechnology companies. Figure 3 – Existing Site Photos depicts existing conditions at and in proximity of the project site.

2.2.1 General Plan Land Use Designation

The City of San Carlos 2030 General Plan designates the project site as Planned Industrial, a land use designation that permits research and development, bio-tech, light industrial, flex, warehousing and related uses.

2.2.2 Zoning

The project site has a zoning designation of IP (Industrial Professional). This zoning designation is intended for large or campus-like office and technology development that includes office, research and development, manufacturing, and other large-scale, professional uses. Permitted uses include incubator research facilities, prototype manufacturing, testing, repairing,

packaging, and printing as well as offices and research facilities. Accessory or secondary small-scale retail uses that serve local employees and visitors are also permitted. The IP zoning designation has a maximum building height of 100 feet, a maximum floor area ratio (FAR) of 2.0, and it requires a 20-foot setback on the front lot line and a 5-foot setback on the street side lot line.

2.2.3 Surrounding Land Uses and Existing Site Characteristics

In the immediate vicinity of the project site, Highway 101 borders the site to the northeast, a multi-tenant life science building, including a laboratory testing facility, borders the site to the northwest, Sutter Health Urgent Care-San Carlos Center and Palo Alto Medical Foundation Laboratory border the site to the southeast, and Industrial Road borders the site to the west/southwest. Access to the site is provided via Industrial Road (see Figure 2 – Project Vicinity). Open drainage ditches are located along the site perimeter on the north, east, and south sides.

Single-family residences are located approximately 700 feet to the southwest of the project site across Industrial Road. The San Carlos Airport is located approximately 0.33 miles to the southeast of the project site. The following facilities are currently located across Industrial Road to the west: Delta Star (transformer manufacturer), Advantage Converting (manufacturing), Honda San Carlos (vehicle service and parts), and Anwita Biosciences (medical research).

The project site is currently developed as an open yard with asphalt paving and concrete pads, numerous sheds and storage containers, and three existing buildings: a Shops building, a Fleet Maintenance building, and an Operations building, all of which were originally built in the 1970s. There are several driveways serving the site and two parking lots along Industrial Road. The existing site also has perimeter security site walls, fencing and gates, two emergency generators in an emergency generator yard, two office trailers totaling 3,800 sq. ft., a 2,180-square-foot fitness trailer, a 1,950-square-foot fleet fueling station, and an 800-square-foot “fast fuel” compressed natural gas (CNG) station to remain.

The three main on-site buildings altogether comprise 70,710 sq. ft. of occupied building space. The existing Shops building, a 9,534-square-foot single-story building, is in the southeastern corner of the site. The existing Fleet Maintenance building, a 7,979-square-foot single-story building, is also located in the southeastern corner of the site. The existing Operations Building, a 57,400-square-foot two-story building, is located just off Industrial Road on the western side of the property.

The site is almost entirely hardscaped; the portions of the site that are not developed with structures are paved and serve as parking spaces, drive aisles, or materials storage areas (see Figure 3 – Existing Site Photos). There are a number of trees on the project site located in the western half of the site in landscaped areas adjacent to the Operations Building, distributed throughout parking areas, and along Industrial Road. Most of the on-site landscaped area is located in a noncontiguous strip along Industrial Road that buffers the majority of the project site from the roadway. This strip is bordered by 8-foot-high ornamental fencing with metal mesh, which was installed as part of Phase 1 of the project (see Section 2.4.6 for more information on project phasing), on its eastern side. An 8-foot-high perimeter security wall made of precast concrete connects to the site entry fencing and extends to enclose the project site on its northwestern, eastern, and southeastern boundaries. The perimeter security wall was also installed during Phase 1 of the project. In addition to the site entry fencing, chain-link fencing extends from Industrial Road in the southern and northwestern corners of the site and encompasses two sides of the project site. The chain-link fencing that extends directly from Industrial Road in the southern corner of the site ends when it meets the security wall; the remaining sections of chain-link fencing run along the exterior length of the security wall leaving a gap of varying width between the fencing and wall.

The project site is surrounded on three sides by unnamed, engineered, open drainage ditches that carry stormwater runoff from north and west of the project site to a culvert that travels under Hwy 101. The perimeter chain-link fencing runs along the banks of the drainage ditch (northwestern side) and within the drainage ditch itself (eastern side). The drainage ditches support a mostly natural earthen bed and bank that generally flows west to northeast. The ditches contain surface water, ruderal vegetation, and field grasses, including perennial vegetation such as cattails (*Typha* sp.), and tule (*Scirpus* sp.). The drainage ditch along the southeastern portion of the project site contains a narrow corridor supporting mixed riparian woodland. The drainage ditches receive stormwater from the project site, Highway 101, Industrial Road, and surrounding parcels. The drainage ditches connect to a Caltrans owned and maintained culvert under Highway 101; stormwater collected within the drainage ditches is conveyed through the Highway 101 culvert and eventually drains to the San Francisco Bay.

Several easements are recorded on and adjacent to the project site. A non-exclusive easement for a private road is recorded along the northwestern property line where it encompasses part of the project site and some adjacent land and contains within it one of the drainage ditches adjacent to the site. This easement runs roughly from Highway 101 to the centerline of Industrial Road. An easement for “private street, sewer, and utilities and to construct, maintain, and operate an industrial railroad” is recorded in the Industrial Road right-of-way (ROW). An easement for a public street and a 10-foot easement for sanitary sewer are also recorded in the Industrial Road ROW. An easement for storm drainage purposes is recorded along a portion of the eastern property line from roughly the southeastern corner of the property to a point about halfway along the property line. This easement contains within it one of the open drainage ditches.

The project site experiences overland flooding in its existing condition. Floodwaters that enter the site typically originate from Belmont Creek, which is located approximately 0.25-miles northwest of the project site’s northern property line. During storm events, floodwaters from Belmont Creek historically have overtopped the top of creek bank and traveled to the project site via the drainage ditches described previously and via Industrial Road. During 10-year storms events, there is no on-site ponding of floodwaters. During 100-year storm events, water ponds on site in low-lying areas to a depth of around one (1) foot at the CNG fueling station, the northernmost parking lot, the parking lot immediately northwest of the Operations Building, the outdoor materials storage area along the eastern property line (i.e., the future location of the Logistics Warehouse and Shops Building), and several locations along the southern property line near the southern corner of the property. The existing Operations building is set at least 2 feet above the Federal Emergency Management Agency (FEMA) base flood elevation (BFE) level. Existing on-site flooding during 100-year storm events is shown in Figure 4 – Flooding During 100-Year Storm - Existing Conditions.

2.3 PROJECT ACTIVITIES

The proposed project would consist of:

- Replacing existing Shops building with new Logistics Warehouse & Shop building;
- Replacing existing Fleet Maintenance building with new Fleet building;
- Renovation of exterior of existing Operations building and expansion of Operations building lobby/canopy;
- Repairing or replacing existing paving;
- Upgrading site lighting;
- Constructing new landscape and stormwater runoff bioretention areas;
- Constructing a canopy over the existing fleet fuel island;
- Constructing a new materials and equipment storage building, telephone storage racks, canopies, and uncovered areas;

- Constructing photovoltaic (PV) canopies over employee parking;
- Constructing unoccupied storage facilities for power tools, transformers, and other weather-sensitive items; and
- Repairing, upgrading, and re-routing associated underground utility infrastructure.

2.4 PROPOSED PROJECT

The proposed project would consist of updating the Master Plan for the existing PG&E San Carlos Service Center. The project does not propose change land uses at the site, add new uses to the site, or expand existing uses.

The project would alter the three main on-site facilities as follows:

- Demolish the existing, 9,534-square-foot Shops building and replace it with a 52,000-square-foot single-story Logistics Warehouse & Shops building consisting of shops and enclosed warehouse space, and another 7,250 sq. ft. of unconditioned covered storage for a total of approximately 59,250 sq. ft.
- Demolish the existing 7,979-square-foot Fleet Maintenance building and replace it with a new 20,000-square-foot, single-story Fleet Maintenance building used to maintain and repair PG&E service vehicles, and another 2,030 sq. ft. of covered fleet storage for a total of approximately 22,030 sq. ft.
- Renovate the existing, approximately 57,400-square-foot Operations building, which is a two-story building that serves primarily office and meeting room uses.

The project also includes the construction of new accessory structures, which include a 2,000-square-foot enclosed, single-story material storage building, a 3,600-square-foot covered (canopy) material storage pad with storm water runoff protection curb, 5,500 sq. ft. of covered (canopy) power pole storage racks, a canopy over an existing 375-square-foot covered waste/recycling enclosure, a canopy over an existing 1,950-square-foot fleet fuel station, 30,000 sq. ft. of photovoltaic (PV) canopies over employee parking, and a potential future emergency generator.

In total, the project proposes approximately 175,951 sq. ft., or 21.9 percent, of lot coverage. (see Figure 5 – Proposed Site Plan). This total lot coverage includes 140,680 sq. ft. of total building area and 35,271 sq. ft. of non-occupied structure space. Of the proposed total building area, 133,450 sq. ft. would be considered occupied area for the purpose of calculating the project's proposed floor area ratio (FAR). Approximately 112,578 sq. ft., or 14.1 percent of the site, would be landscaping, including bioretention areas and flow-through planters. The remainder of the site would consist of hardscape in the parking lots, driveways, drive aisles, and internal vehicular circulation routes, pathways, sidewalks, and open materials storage areas.

The project site would have internal vehicular circulation; separate employee, visitor, and fleet parking; and paved surfaces for laydown/material storage. PG&E plans to exceed code minimums for Electric Vehicle Charging Stations in the fleet parking area as it transitions to more electric fleet vehicles. The project also proposes the repair and replacement of existing paving; site lighting upgrades; new landscape and bioretention areas; and the repair, upgrade, and re-routing of associated underground utility infrastructure.

The proposed project would have a Floor Area Ratio (FAR) of 0.11. The new and existing on-site buildings would not exceed the maximum allowed building heights allowed in the IP Zoning District.

The site would continue to employ the same number of employees, which consists of approximately 356 people. The project would make improvements to the existing on-site parking

lots, which would result in a total of 537 on-site vehicle parking spaces and 27 parking spaces for bicycles.

2.4.1 Building Sizes and Characteristics

The proposed project includes the demolition and replacement of the existing Logistics Warehouse and Shops building, the demolition and replacement of the existing Fleet building, and the exterior renovation of the existing Operations building (see Figure 5 – Proposed Site Plan and Figure 6 – Site Renderings). The project's proposed structures would have a minimum front setback from Industrial Road of approximately 118 feet (the existing Operations building), a minimum interior side setback of approximately 34 feet (the existing fitness trailer), and a minimum rear setback of roughly 28 feet (treated pole storage bins).

The project proposal also includes the construction of new accessory structures, as described below.

Logistics Warehouse & Shops Building

The Logistics Warehouse & Shops building would house warehouse storage for materials and equipment, and the shops rooms would provide dedicated tool storage and workspace for each line of business. The existing Shops building is a 9,534-square-foot, one-story building located in the southeastern corner of the project site. The new Logistics Warehouse & Shops building would be located centrally in the eastern half of the project site. The new Logistics Warehouse & Shops building would be a single-story building measuring 20 feet high with 57,350 sq. ft. of total building area (see Figure 7 – Logistics Warehouse & Shops Building Elevations). The building would consist of an outdoor covered storage area, which would be partially enclosed by 10-foot-high ornamental fencing and gates, and a connected, fully enclosed warehouse space and shop rooms. An additional 7,250 sq. ft. of covered canopy (i.e., concrete overhang with support pillars) would be used as a covered loading zone, and other miscellaneous uses would extend from the new building at several locations. A 991-square-foot waste and recycling enclosure with a 10-foot-high enclosure wall would be located at the northern edge of the new Logistics Warehouse & Shops building under the outdoor storage area canopy. The building would be surrounded by a combination of covered and uncovered loading zones on all sides.

The building would be fully fire sprinklered. The building would be all-electric per the San Carlos Municipal Code (§15.04.125).

The design of the new Logistics Warehouse & Shops building would incorporate wood decor Trespa pura sidings and fiber cement for exterior sidings. The building would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing.

The new Logistics Warehouse & Shops building would be located in a Special Flood Hazard Area (SFHA), Zone AE, with a BFE level of 10 feet. The Logistics Warehouse & Shops building would be located one foot above the BFE level.

Fleet Building

The Fleet building is used to maintain and repair PG&E service vehicles. The existing Fleet building is a 7,979-square-foot, single-story building located near the southeastern corner of the project site. The new Fleet building would be in roughly the same portion of the project site as the existing building, though the new building would be aligned parallel to the eastern property line and Highway 101. The new Fleet building would be a single-story building measuring 32 feet high with 20,630 sq. ft. of total building area, which includes the enclosed portion of the building and additional covered canopy area (see Figure 8 – Fleet Building Elevations). The

18,600-square-foot building would consist of fleet maintenance garage bays, equipment and electrical/mechanical rooms, an office, a break room, and a covered vehicle wash bay. The covered wash bay and maintenance garage bays would be physically separated by intervening equipment storage and utility rooms. The wash bay (included in the overall building square footage) would be covered and enclosed to contain overspray. Proprietary wash bay equipment would collect, clean, and recycle water to reduce water use. To prevent the possibility of the escape of contaminants into on-site utilities systems, the six fleet maintenance garage bays would not have connections to storm drains or sanitary sewer lines. Spills would be contained and trained staff would use on-site materials and equipment to absorb and properly dispose of contaminants. Hazardous materials, including motor oil and hydraulic lift oil, would be stored in this building. All hazardous materials drums and containers would be stored off the ground in secondary containment or on pallets.

Approximately 2,030 sq. ft. of covered canopy area would extend from the building in several locations. The building would be fully fire sprinklered and all-electric per the San Carlos Municipal Code (§15.04.125).

The design of the new Fleet building would incorporate wood decor sidings and fiber cement for exterior sidings. The building would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing.

The new Fleet building would be located partially in a FEMA SFHA, Zone AE, and in Zone X, areas with 0.2% annual chance flood hazard. The new Fleet building would be located one foot above the BFE level of 10 feet.

Operations Building Renovations

The existing Operations building is a two-story, 57,400-square-foot building measuring 23 feet high (see Figure 9 – Operations Building Elevations). The building is fully fire sprinklered. The Operations building would remain in its current location. The project proposes to renovate the exterior of the existing building, expand the lobby and entry canopy of the building, and transition the building to all-electric energy use. The Operations building serves as a hub of operations and administrative activity. The building contains open office spaces, meeting rooms, conference rooms, “bullrooms” for various company services (e.g., electric field operations, distribution grid field metering, gas field services, and more), various ancillary rooms, a lobby, and atrium, and an exterior courtyard in the center of the building. The Operations building has an average office use intensity, with a lower intensity from mid-morning through the afternoon as crews disperse out to the field.

The Operations building exterior renovations would incorporate wood decor sidings and fiber cement for exterior sidings. The building would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing. The main entrance to the building would consist of an offset glazed system storefront with bronze accents.

The existing Operations building is located in FEMA Flood Zone X, areas of 0.2% annual chance flood hazard. The Operations building is located two feet above the BFE level of 10 feet.

Materials Storage Facilities

The project proposes the construction of new materials storage facilities. The project proposal includes a new material storage building parallel Highway 101 near the eastern property boundary (see Figure 5 – Proposed Site Plan). The Material storage building would be a single-story, 2,160-square-foot building measuring 18 feet in height (see Figure 10 – Material Storage

Building Elevations). Approximately 3,500 sq. ft. of curbed material storage canopy area would be located adjacent to the material storage building, resulting in a total of 5,660 sq. ft. of building area for this structure. The Material storage building and covered canopy Material storage area would serve as the main hazardous materials storage location on site. The material storage building would be fully fire sprinklered. The new materials storage facilities would be located partially in a FEMA SFHA, Zone AE (BFE level of 10 feet), and in Zone X, areas with 0.2% annual chance flood hazard.

New storage facilities would store power tools, transformers, and other weather-sensitive items. The proposed treated power pole storage racks would consist of four contiguous, covered storage areas totaling 5,050 sq. ft. The treated pole storage racks would be located south of the new material storage building along the eastern site security wall. The racks would elevate the treated power poles off the ground to prevent contact with stormwater runoff. The power pole storage area would be surrounded by a concrete berm to prevent stormwater runoff or flood waters from traveling through the area. A new 10-foot-tall, covered canopy would be added to the existing waste and recycling area north of the Operations building.

A covered gas and electrical materials storage area of unspecified size would be located south of the treated pole storage area and just east of the new Logistics Warehouse & Shops building, respectively.

Photovoltaic (PV) Carports

A new PV carport canopy measuring approximately 19.5 feet in height with 16.5 feet of clearance would be installed over the existing fleet fuel station fuel pumps. The proposed photovoltaic (PV) carports would be located over most of the parking spaces in the improved employee parking lot located south of the Operations building. The project proposes approximately 20,850 sq. ft. of PV carport area. The PV carports would be completely open on all sides and would measure 15 feet in height with a minimum of ten feet of clearance. The drive aisles separating the PV structures would have a minimum width of 25 feet of clearance. Electricity generated by the PV carport panels would be used on site to reduce the amount of electricity that would otherwise be obtained via the electrical grid.

Accessory Structures

Existing on-site accessory structures that would remain on site following project completion include:

- The 336-square-foot compressed natural gas (CNG) fast fuel facility, which consists of a fuel island accessed directly from Industrial Road and adjacent ancillary equipment located within the site security fencing;
- The 1,050-square-foot office trailer located east of the CNG fast fuel facility and entry/exit gates D and E;
- The 2,050-square-foot office trailer located in the southern portion of the project site just inside the site security wall;
- The 2,200-square-foot fitness trailer located in the southern corner of the project site near entry/exit gate A;
- The 1,950-square-foot fleet fuel station located west of the existing Fleet building;
- The emergency generator and mechanical equipment yard located north of the Operations building;
- The 1,425-square-foot standalone waste and recycling area north of the Operations building;
- Several small storage containers near the southern site security wall; and
- Transformer panels and utility meters.

Table 2-1: Existing versus Proposed Building Area of Major Facilities provides a summary of the existing versus proposed building area of the major on-site facilities.

Table 2-1: Existing versus Proposed Building Area of Major Facilities

Building	Existing	Proposed
Operations building	57,400	57,400
Fleet building	7,979	20,630
Logistics Warehouse & Shops building*	9,534	57,350
Material storage building	N/A	5,660
Notes: -Building area is presented in square feet. -The existing facility is a Shops building and does not contain a warehouse component.		

2.4.2 Site Design Improvements

The project proposal includes extensive design improvements throughout the site, including replacement and reconfiguration of parking lots, replacement of concrete and asphalt not associated with parking lots, removal of existing trees and replanting of trees and other landscaping improvements, construction of bioretention areas for capture and pre-treatment of stormwater runoff, removal or rerouting of some existing utilities and installation of new utilities, installation of new lighting fixtures and signage, and installation of photovoltaic panels in the replaced employee parking lot. Parking lot improvements are discussed in detail in Section 2.4.3 below. Utilities improvements are discussed in Section 2.4.4 below.

Landscaping

Existing

The project site contains approximately 76,577 sq. ft. of existing landscaped area. Most of the existing landscaped areas are located in the western portion of the project site between the site entry/exit security fencing and Industrial Road. There are additional landscaped areas surrounding the Operations building to the north/northwest, east, and south/southeast; in the existing employee parking lot southeast of the Operations building; and in the fleet parking lot immediately northwest of the Operations building. These landscaped areas contain shrubbery, groundcover, and trees. Currently, there are 66 trees located on site. Of the 66 on-site trees, 32 trees are located within or near the project's proposed areas of impact.

Proposed

Existing landscaping improvements in the Industrial Road frontage landscaping strip would largely remain, as would some landscaping improvements proposed for the row of visitor parking stalls west of the Operations building nearest the sidewalk along the eastern side of Industrial Road.

54 of the existing on-site trees would remain. The project would remove 12 of the existing on-site trees, six of which are considered Protected tree species per the San Carlos Protected Tree Ordinance (see Appendix A – Arborist Report). The project would plant 19 replacement trees for the removed Protected trees, which would exceed the Protected Tree Ordinance's required replacement ratio of 2:1. The project proposes planting a total of 33 new trees, which would result in a total of 87 on-site trees. The project would provide one tree for every 9,209 sq. ft. of lot coverage. The newly installed trees would consist of red maple, coast live oak, and Chinese elm trees. The red maple tree species is a medium water use plant, while the coast live oak and

Chinese elm species are very low and low water use species, respectively. All proposed shrub and grass plantings would be one- and five-gallon low water use species.

The existing site entry/exit security fencing, chain-link fencing, and security wall would also remain as is. Non-vegetative landscaping improvements include new trash/recycle receptacles, concrete seat walls, benches, concrete pedestrian pavement, and permeable pavers installed at one of the driveways.

The project would result in a total of 112,578 sq. ft. of on-site landscaping, or 14.1 percent of the site (see Figure 11 – Landscaping Plan). The proposed landscaped area includes 4,713 sq. ft. of bioretention area and 2,770 sq. ft. of flow-through planter area. The proposed bioretention and flow-through planter areas are discussed further in Section 2.4.4 Utilities.

Lighting

The proposed site lighting upgrades include new light poles installed in the employee, visitor, and fleet parking lots, and along site entry/exit driveways. As stated previously, the large employee parking lot southeast of the Operations building would be improved with new photovoltaic (PV) carports. The PV panels would have integrated lighting to illuminate the covered parking stalls to Code-required light levels. Additionally, the new buildings would have mounted light fixtures that would contribute to overall site illumination.

Signage

The project proposes to include monument signage, general signage, parking signage, building signage, and directional signage. An existing monument sign located off Industrial Road parallel to the Operations building would remain as is with no changes. The project proposes five types of general signs for emergency contact information, video surveillance, “no trespassing,” entrance only, and exit only. These signs would be located predominantly at or near the site entrance and exit gates. All general signs would have a white metallic background with blue reflective lettering. Parking signage would indicate employee parking, visitor parking, and fleet parking areas. Parking signage would have a white metallic background with black lettering. The Operations building, Logistics Warehouse and Shops building, Fleet building, and Material storage building would have building name and address signage located on the building façade above/adjacent to main entry points consisting of black background with white lettering. New directional signage located throughout the property for employee parking, the fleet fuel station, fleet parking, materials storage areas, and materials loading areas would consist of white metallic background with black lettering.

2.4.3 Site Access, Parking, and Circulation

The project site would continue to be accessed via four existing vehicular driveways and two existing pedestrian entrances off Industrial Road. The four existing driveways each have automatic sliding barrier gates; the northernmost driveway has two gates, an automatic swing entry gate and an automatic sliding exit gate. Each vehicular gate is labeled alphabetically from A through E. Vehicular gates B, C, D, and E each have a Knox Box, card reader, and intercom system. The site’s pedestrian entrances are also locked with swing gates. The drainage ditches surrounding the project site is also accessed from the project site via two locked chain-link gates located in the northwestern and southern corners of the property.

Additional on-site driveways include one ingress driveway and one egress driveway off Industrial Road providing access to the existing CNG fueling station, one ingress driveway and one egress driveway providing access to/from Industrial Road to a visitor parking lot in front of the Operations building main entrance, and one ingress/egress driveway providing access to/from Industrial Road to an employee parking lot.

The project site would continue to have multiple parking lots distributed throughout the site. As mentioned above, a visitor parking lot is located off Industrial Road in front of the Operations Building main entrance. The project proposal includes repairing this visitor parking lot in the same location. Repairs would mainly include a 2" asphalt grind and overlay and restriping. An employee parking lot is located off Industrial Road south of the Operations building. The project proposal includes replacing this parking lot with a visitor parking lot in the same location. In the interior of the site beyond the site security fencing, there is an additional, larger employee parking lot. The project would replace this parking lot and install 30,000 sq. ft. of photovoltaic (PV) panels in the improved parking lot. An existing fleet parking lot is located immediately northwest of the Operations building. This parking lot would be demolished, graded, and repaved in the same location.

Currently, nearly the entire eastern half of the project site consists of fleet parking spaces and materials storage areas. The project would cover some of the existing fleet parking spaces with the new Logistics Warehouse & Shops building and covered materials storage area. The existing fleet parking lot in the northern corner of the site would be repaired with a 2" asphalt grind and overlay and restriping. The project would maintain some of the existing fleet parking in the eastern corner of the site, but the existing parking spaces would be replaced and rearranged to accommodate the new Fleet building. Lastly, the existing rows of parking spaces directly bordering the Operations building to the south, east, and north would be replaced but remain in the same location. In summary, the project would repair all existing surface parking lots, and some of the existing parking lots would also be rearranged to accommodate new buildings and structures.

Vehicular circulation throughout the project site would be facilitated by interior roads and drive aisles, most of which currently exist. Some of the existing interior roads and drive aisles would be reconfigured to accommodate the proposed new buildings and structures. In addition, some of the site's interior roads would serve as fire service vehicle access lanes, as described below.

The project would provide 537 vehicular parking spaces with 11 of those spaces being designated Americans with Disabilities Act (ADA) accessible. The project would also provide 35 electric vehicle (EV) parking spaces. All vehicular parking provided by the project would consist of surface parking.

The project would provide approximately 27 bicycle parking spaces, including four outdoor bike rack spaces with electric bike charging adjacent to the Operations building, six bike lockers that hold 12 bikes, and 11 bike rack spaces inside the Operations building.

Fire and emergency services vehicles would access the project site through three of the site's four entrance driveways (see Figure 12 – Fire Access Plan) off Industrial Road. The site's internal circulation lanes would serve as fire and emergency vehicle access lanes. These lanes vary from a minimum of 20 feet wide to a maximum of 40 feet wide and would provide access to all areas of the project site, including the Operations building, Logistics Warehouse & Shops building, and Fleet building. The project would provide adequate aerial apparatus (ladder truck) access for the proposed Fleet building, which would measure 32 feet in height, along the eastern façade of the building per the City's requirements for aerial access for buildings over 30 feet in height.

Pedestrian access to the interior of the project site is controlled by locked swing gates. The project site has a pedestrian sidewalk along Industrial Road that parallels the western boundary of the site. Sidewalks are also located along the visitor parking lot in front of the Operations building. These sidewalks provide pedestrian access to the Operations building entrance and the two pedestrian access gates. From the pedestrian access gates, the sidewalks extend into the interior of the site and border the Operations building to the northwest and southeast. The

existing sidewalks described above would remain. The project would also create an ADA-accessible pathway from the on-site buildings to the sidewalk on Industrial Road.

2.4.4 Utilities

The proposed project includes repairing, upgrading, and re-routing associated underground utility infrastructure. Existing, re-routed, and new utility infrastructure would tie into utility mains in Industrial Road. On-site improvements would be required to serve the new facilities. Utilities at the site would include potable water service, sanitary sewer service, natural gas (for existing buildings, fuel pumps, and CNG station) and electricity, and stormwater management.

The following summarizes the utility providers for the project and improvements that would need to be made to facilitate the project. See Figure 13 – Utility Plan for the proposed project's utility infrastructure and connections.

Water Supply

The Mid-Peninsula Water District provides water service to the City of San Carlos and would provide potable water to the project. Implementation of the proposed project would require the installation of/improvements to water infrastructure on the property:

- Install 1" domestic water point of connection for new Logistics Warehouse & Shops.
- Connect 125 linear feet of new domestic water line to serve Logistics Warehouse & Shops building to existing water line that connects the existing Shops building location with water main in Industrial Road.
- Convert existing 2" water stub that serves the existing Shops building to a new point of connection for the new Fleet building.
- Install new fire department connections on new Logistics Warehouse & Shops building, Fleet building, and Material building.
- Install new fire water points of connection for new Logistics Warehouse & Shops building and Fleet building.
- Reconnect proposed 8" fire water line that would serve the Logistics Warehouse & Shops building to existing pressurized fire water line that runs from Industrial Road to the location of the existing Shops building.
- Reconnect proposed 8" fire water line that would serve the Material Storage building to existing pressurized fire water line that runs east of the Operations building.
- Convert existing fire water stub to a new point of connection for new Fleet building.
- Replace existing fire water backflow preventer with new backflow preventer at point of connection with water main in Industrial Road.

Sanitary Sewer Service

Sanitary sewer service would continue to be provided by the City of San Carlos and treated at the Silicon Valley Clean Water Treatment Plant. Implementation of the proposed project would require the installation of/improvements to sewer infrastructure on the property:

- Connect existing 4" sanitary sewer line that runs from the existing Shops building to Industrial Road to new 6" sanitary sewer line that would serve the Logistics Warehouse & Shops building.
- Install new 6" sanitary sewer point of connection for Logistics Warehouse & Shops building.
- Convert existing 4" sanitary sewer stub serving existing Shops building to new point of connection for Fleet building.

- Excavate and install new 122 linear feet of trench drain and 24 linear feet of 6" sanitary sewer line connections to sanitary sewer pipe near new gas and electrical materials open storage area.

Electricity and Natural Gas Services – Including Emergency Backup Generators

Electricity and natural gas would be provided to the project site by Peninsula Clean Energy (PCE) and Pacific Gas and Electric (PG&E), respectively. PCE is San Mateo County's Community Choice Aggregate (CCA), a community-controlled, not-for-profit joint powers agency. PCE procures the sources of electricity throughout San Mateo County, while PG&E, the project applicant, manages and maintains the electrical infrastructure used to supply consumers with electricity. PG&E would generate some electrical power on site using the proposed parking lot photovoltaic (PV) carports.

The new project buildings would be all electric. The existing Operations building would also be converted to all electric energy use. All existing and new electricity utility infrastructure would be undergrounded.

Implementation of the proposed project would require the installation of/improvements to electricity and gas infrastructure on the property:

- Relocate existing streetlights in the fleet parking lot northwest of the Operations building.
- Install new EV charging station in the fleet parking lot northwest of the Operations building.
- Install new electrical line and connect to new Fleet building.
- Connect new electrical line serving new Fleet building to existing electrical line in southeastern corner of the project site.
- Reconnect existing conduits clustered between locations of new Logistics Warehouse & Shops building and new Fleet building to proposed reroute.
- Reconnect existing electrical lines to new Fleet building.
- Relocate existing fueling equipment in fleet parking lot located northwest of Operations building.
- Make electrical line improvements to use the electricity generated by the photovoltaic (PV) carports on site.

The project proposes to install one 400kW emergency generator in the existing emergency generator yard north of the Operations building. The emergency generator yard currently contains three generators, including two 250kW generators and one 400kW generator.

Stormwater Management

The project is required to comply with San Mateo County Storm Water Pollution Prevention Program (SWPPP), C.3 provisions – Construction Stormwater best management practices – and the City of San Carlos' existing regulatory requirements, including Chapter 13.14, Stormwater Management and Discharge Control, which is designed to reduce pollutants in stormwater discharges to the maximum extent practicable. To meet C.3 requirements, stormwater run-off from the site would be directed to a series of bioretention areas and flow-through planters that allow for the treatment of stormwater before draining to the adjacent open drainage ditches.

As noted previously, the existing project site is mostly hardscaped with 705,545 sq. ft. of impervious surface area, or 88 percent of the site. The project would result in 680,233 sq. ft. of impervious surface area, a reduction of 25,312 sq. ft. compared to existing conditions. The project would capture the stormwater runoff from roughly 184,693 sq. ft. of on-site impervious surface area for treatment in new bioretention areas and flow-through planters. Wash off water

from 21,413 sq. ft. of impervious surface area would be conveyed to the City sanitary sewer because the wash off water would come from within areas used for materials storage. The project proposes 112,578 sq. ft. of on-site landscaping, or 14.1 percent of the site (see Figure 14 – Stormwater Control Plan). The proposed landscaped area includes 4,713 sq. ft. of bioretention area and 2,770 sq. ft. of flow-through planter area. One bioretention area measuring 2,607 sq. ft. would be located east of the Operations building and north of the employee parking lot and the second bioretention area measuring 2,106 sq. ft. would be located in the southern corner of the project site south of the employee parking lot. The first set of flow-through planters totaling 2,043 sq. ft. would be located along the façade of the Logistics Warehouse & Shops building to the east. The second set of flow-through planters totaling 727 sq. ft. would be located along the northwestern façade of the Fleet building.

Implementation of the proposed project would require the installation of or improvements to storm drain infrastructure on the property:

- Connect 22 linear feet of 6" new storm drain pipes to existing 15" storm drain pipes north of the new Fleet building.
- Install 61 linear feet of new 4" storm drain line to existing inlet south/southwest of the new Fleet building.
- Install new storm drain inlets north and east of the Operations building and east of the new Logistics Warehouse & Shops building.
- Connect existing 6" and 15" storm drain lines to new storm drain inlets.
- Install 437 linear feet of trench drain in the treated pole and gas and electrical material storage areas.

2.4.5 Flooding and Sea Level Rise Hazards

As described above in Section 2.2.3, the project site floods during 100-year storm events under existing conditions. As shown in Figure 15 – Floodwater Overlay Plan, flood waters would pond to varying depths above the BFE level at different locations within the project site under various modeled storm and sea level rise scenarios under proposed conditions.

Flood Control Improvements

The new Logistics Warehouse & Shops building, Fleet building, and Material Storage building would be raised one foot above the BFE (including sea level rise projections) levels shown in Figure 15. Stormwater runoff would be collected at existing and new storm drain inlets located throughout the site, including in areas projected to experience deeper ponding under proposed conditions (see Figure 13 and Figure 15), and routed through new bioretention areas prior to entering the City's storm drain system. Where new storm drain inlets would be installed, the site would be graded to create slightly sloping terrain to direct storm water into the new inlets.

The proposed treated pole storage bin would be located in an area that would be prone to flooding. Figure 15 shows modeled flood elevations of 8.5 to 9.5 feet during a 100-year storm in the pole storage area. The modeled flood elevations are based on FEMA's Water Surface Elevation (WSE) plus 6 feet to account for sea level rise. The finished surface elevations of the pole storage area are shown ranging from 9.5 to 10 feet. There would be a slight (0.5%) downward slope (east to west) within the bin storage area and a downward slope (0.9-1.1%) west to east along the side of the bin storage area facing the interior of the project site to direct any runoff into two proposed storm water runoff trench drains. A drive-over concrete berm is proposed to surround the bin storage area perimeter. Runoff from rainfall would flow directly into the trench drains, and the trench drains will flow to a storm drain line. These measures are proposed to prevent runoff and flood waters from entering the pole storage area.

A new trench drain would be installed along the length of the outdoor gas and electrical material storage area. A new drive-over concrete berm would surround the perimeter of the gas and

electrical material storage area. These measures are proposed to minimize the amount of flood water that would enter the gas and electrical material storage area.

Section 3.10, Hydrology and Water Quality, contains a more detailed discussion of on-site flooding hazards and project impacts related to flooding and sea level rise.

2.4.6 Project Construction

Construction of the proposed project is anticipated to commence in early 2025 and end in 2027.¹ Construction of the project would begin with demolition of some existing site features are shown in Figure 16 – Demolition Plan. Project construction would be split into six phases (see Figure 17 – Project Phasing Plan):

- Phase 1: Perimeter Security Construction (*completed in 2022 under separate permit*)
 - Install perimeter security fence, gates, walls, and CCTV cameras.
- Phase 2: Site Improvements (Visitor Parking, Fleet Parking, and Employee Parking Construction) (Commences in early 2025)
 - Replace current employee parking and fleet parking surface lots. Build stormwater detention basins/infrastructure. Re-route/replace underground utilities for future buildout. No existing building structures would be affected.
- Phase 3: Material Storage Construction (Commences in early 2025)
 - Build new non-occupied material storage canopy, material storage building, and pole storage racks. No existing building structures would be affected.
- Phase 4: Logistics Warehouse Construction (Commences in 2025)
 - Build a new Logistics Warehouse & Shops Building. Relocate equipment and operations from existing Logistics building into new Logistics building. Add new emergency generator. No existing building structures would be affected.
- Phase 5: Fleet Building and Parking Construction (Commences in 2026)
 - Build new Fleet Maintenance building. Relocate equipment and operations from existing Fleet building into new Fleet building. Demolish the existing Fleet building and replace the area with fleet parking.

The project proposal presents the Operations building renovations as a future phase of the project, as this phase has not yet been funded/scheduled. The project Applicant anticipates this phase would include changing the Operations building's energy consumption to all-electric, reducing overall energy use. No additional building area would be added, and no change of use would be anticipated during this phase.

Tables 2-2 through 2-5 provide information, including activities involved and anticipated equipment for the construction of each of the project phases. Phases 2, 3, and 4 are anticipated to begin construction in 2024 and be completed in 2025. Phase 5 is anticipated to begin in 2026 and be completed in 2027.

Table 2-2: Phase 2 (Site Improvements) Construction Schedule

Activity	Approximate Duration	Anticipated Equipment
Demolition	1 year	

¹ Note the proposed Operations building renovations are currently unscheduled but are anticipated to be completed in 2029.

Activity	Approximate Duration	Anticipated Equipment
Site Preparation	1 year	Gradall Forklifts; Water Trucks; Grading Equipment (Backhoe, Dozer, Scrapers, trenchers); Compactors; Truck-mounted Drill Rig
Grading	1 month	
Trenching (on- and off-site utility work)	1 month	
Building Construction (foundation)	3 months (3 buildings)	Gradall Forklifts; Water Trucks; Compactors; Truck-mounted Drill Rig; Gravel, Steel and Concrete Trucks, Pumpers, Finishers
Building Construction (vertical)	3 months	Steel Trucks; Metal Panel Trucks; Gradall Forklifts, Scissor Lifts; Welders
Building Construction (MEP ² /other)	6 months	Gradall Forklifts; Scissor Lifts; Material and Equipment Delivery Trucks
Paving	1 month	Concrete, Steel, Hot Asphalt and other Construction Material Delivery Trucks; Paving, Rolling Equipment
Coatings	1 month	Striping Equipment, Signage Installation Equipment

Table 2-3: Phase 3 (New Material Storage Canopy and Building, Pole Racks) Construction Schedule

Activity	Approximate Duration	Anticipated Equipment
Trenching (on-site utility work)	1 month	Water Trucks; Grading Equipment (Backhoe, Dozer, Scrapers, Trenchers)
Building Construction (foundation)	2 months	Gradall Forklifts; Water Trucks; Compactors; Truck-mounted Drill Rig; Gravel, Steel and Concrete Trucks, Pumpers, Finishers
Building Construction (vertical)	5 months	Steel Trucks; Metal Panel Trucks; Gradall Forklifts; Scissor Lifts; Welders

² “MEP” refers to mechanical, electrical, and plumbing work associated with building construction.

Activity	Approximate Duration	Anticipated Equipment
Building Construction (MEP/other)	2 months	Gradall Forklifts; Scissor Lifts; Material and Equipment Delivery Trucks
Paving	1 month	Hot Asphalt Trucks; Rollers and Paving Equipment
Coatings	1 month	Striping Equipment

Table 2-4: Phase 4 (New Logistics Warehouse and Shops Building) Construction Schedule

Activity	Approximate Duration	Anticipated Equipment
Grading	1 month	Water Trucks; Grading Equipment (Backhoe, Dozer)
Trenching (on-site utility work)	1 month	Water Trucks; Backhoe; Trenchers; Compactors
Building Construction (foundation)	3 months	Gradall Forklifts; Water Trucks; Compactors; Truck-mounted Drill Rig; Gravel, Steel and Concrete Trucks, Pumpers, Finishers
Building Construction (vertical)	3 months	Steel Trucks; Metal Panel Trucks; Gradall Forklifts; Scissor Lifts; Welders
Building Construction (MEP/other)	6 months	Gradall Forklifts; Scissor Lifts; Material and Equipment Delivery Trucks
Paving	1 month	Hot Asphalt Trucks; Rollers and Paving Equipment
Coatings	1 month	Striping Equipment

Table 2-5: Phase 5 (New Fleet Maintenance Building) Construction Schedule

Activity	Approximate Duration	Anticipated Equipment
Trenching (on-site utility work)	1 month	Water Trucks; Backhoe; Trenchers; Compactors

Activity	Approximate Duration	Anticipated Equipment
Building Construction (foundation)	2 months	Gradall Forklifts; Water Trucks; Compactors; Truck-mounted Drill Rig; Gravel, Steel and Concrete Trucks, Pumpers, Finishers
Building Construction (vertical)	2 months	Steel Trucks; Metal Panel Trucks; Gradall Forklifts; Scissor Lifts; Welders
Building Construction (MEP/other)	6 months	Gradall Forklifts; Scissor Lifts; Material and Equipment Delivery Trucks
Paving	2 months	Hot Asphalt Trucks; Rollers and Paving Equipment
Coatings	2 months	Striping Equipment

Early estimates from the project Applicant anticipate renovations to the Operations building would begin in 2028 and end in 2029, and anticipated equipment would include scissor lifts, material and equipment delivery trucks.

The project would involve 6,185 cubic yards (CY) of cut and 4,047 CY of fill, resulting in a net 2,138 CY of cut. Excess cut material would be off hauled. During project construction, the selected contractor would implement erosion controls, including site perimeter fiber rolls and storm drain inlet protection, to prevent on-site and off-site erosion and sedimentation (see Figure 18 – Erosion Control Plan).

The proposed project would be subject to Chapter 8.05 of the City's Municipal Code, Recycling and Diversion of Construction and Demolition Debris, which provides requirements regarding the percentage of inert materials generated during demolitions activities that must be diverted from landfills.

2.4.7 Project Operation

The project proposal does not include substantial changes to existing on-site operations. The existing facilities are typically active Monday through Friday from 6:30 a.m. to 5:00 p.m. These hours may be extended if needed for emergency events or unique projects. "Peak" times would occur in the early morning (typically between 6:30 a.m. to 8:30 a.m.) and in the late afternoon (from 3:00 p.m. to 5:00 p.m.). The existing service center currently has visitors consisting primarily of vendors, deliveries, and PG&E staff visiting on official business. The project would not change the site's existing operational days or hours.

The project proposal does not include altering the number of on-site employees. The service center currently employs approximately 356 full-time permanent employees. Approximately 161 are field crew staff that drive fleet vehicles and disperse out to worksites after an initial check-in and gathering of materials at the service center. Of the remaining approximately 195 employees:

- Approximately 138 work full-time on-site Monday through Friday 8:00 a.m. to 5:00 p.m.;

- Approximately 45 office employees work in a hybrid work mode part-time on site and part time from home; and
- The Fleet building has a total of 12 dedicated fleet service employees split into two (2) separate work shifts of up to six (6) staff each.

The proposed development is anticipated to become operational in phases per the phasing plan described previously in Section 2.4.6 Project Construction.

Currently, the San Carlos Service Center sees 547 vehicles enter the site, and 572 vehicles exit the site per day on a weekday.

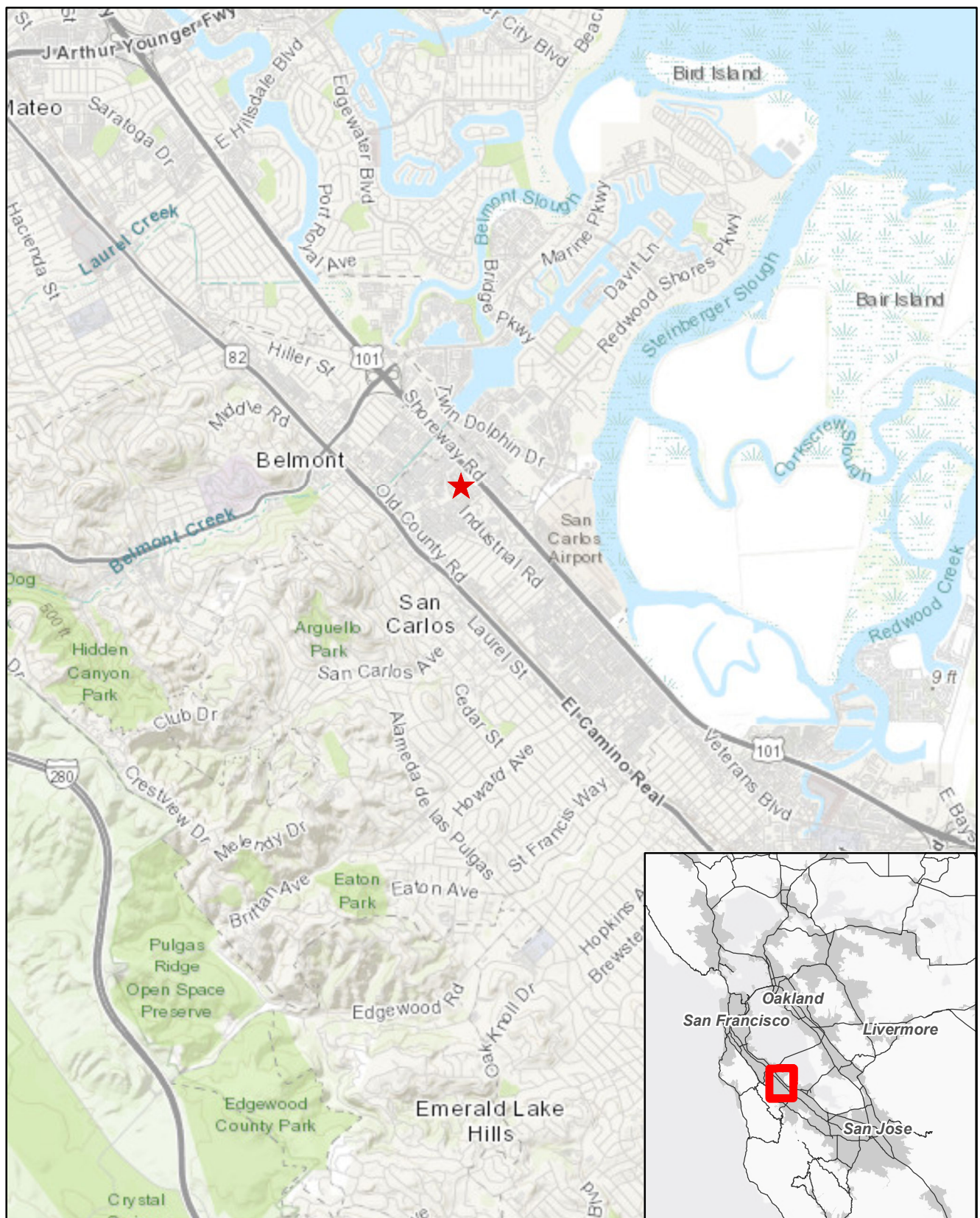
2.5 REQUIRED APPROVALS

Development of the project would require the following approvals from the City of San Carlos:

- Conditional Use Permit
- Design Review
- Building Permit(s)
- Tree Removal Permit
- Grading and Dirt Haul Approval
- City Encroachment Permit
- Variance from TDM plan requirements

Per Section 18.14A.030 (Conditional use permit requirements) of the San Carlos Municipal Code, the Northeast Area Overlay District requires a conditional use permit for a majority of projects and development activity in the San Carlos Northeast Area until the Northeast Area Specific Plan is adopted. Pursuant to the San Carlos Municipal Code (Section 18.26.030(D)), conditional use permits for the Northeast Area are under the authority of the Planning and Transportation Commission, who shall consider whether to “approve, conditionally approve, or deny applications for conditional use permits [in the Northeast Area].” The Northeast Area Specific Plan has not yet been adopted. The project site is located within the Northeast Area Overlay District and qualifies as an application requiring a conditional use permit because it satisfies the following criteria: “Design review, any projects that already require a use permit (in this case only one (1) use permit required), minor use permit, temporary use permit, planned development, zoning amendment, waiver, variance, general plan amendment, development agreement, or any other discretionary approval from the City of San Carlos necessary for the development of a site within the Northeast Area (Section 18.14A.020) in accordance with the San Carlos Zoning Ordinance.”

In addition to the permits listed above, the City will develop a list of Conditions of Approval (COAs) that will contain requirements for controlling environmental impacts during construction such and implementing standard dust control measures, stormwater protection measures, construction traffic management plans, and conducting construction within designated hours.



Source: Esri 2024



Project Location



Figure 1 Project Location

275 Industrial Road PG&E San Carlos Service Center Project



Source: Google Earth 2024



Project Boundary



Not to Scale

Figure 2 Project Vicinity

275 Industrial Road PG&E San Carlos Service Center Project

Figure 3 – Existing Site Photos

Photo 1. View from within the site of perimeter security wall parallel to the property's northwestern property line, looking north toward the neighboring multi-tenant life science building.



Photo 2. View from within the perimeter security wall parallel to southeastern property line, looking south.

Figure 3 – Existing Site Photos (Continued)

Photo 3. View of Highway 101 (foreground), open drainage ditch (background, with vegetation and chain-link fencing in ditch), and Shops building (background) along eastern boundary of project site from Highway 101 northbound, looking west. Note this photo was taken prior to the construction of the recently constructed perimeter site security wall.



Photo 4. View of the Shops building from within the site, looking southeast.

Figure 3 – Existing Site Photos (Continued)



Photo 5. View of the Shops building from within the site, looking east.



Photo 6. View of the Fleet building from within the site, looking southeast.

Figure 3 – Existing Site Photos (Continued)

Photo 7. View of the Operations building and associated parking, looking south toward Industrial Road.



Photo 8. View of the fleet parking lot adjacent to the Operations building (foreground) and neighboring commercial uses west of Industrial Road (background), looking west.



Photo 9. View of the Operations building entrance and western façade, looking north. Note this photo was taken prior to the recently completed frontage landscaping improvements.



Photo 10. View of entrance Gate B (foreground left), employee parking lot (foreground center), and the Sutter Health Urgent Care – San Carlos Center on the neighboring parcel (background), looking southeast.



Photo 11. View of western façade of Operations building and frontage parking lot and landscaping from Industrial Road, looking north. Note this photo was taken prior to recently completed frontage landscaping improvements.



Photo 12. View of PG&E CNG facility (foreground) and neighboring multi-tenant life science building (background) from Industrial Road, looking northeast.

Existing #1 | FEMA WSE | 100-Year

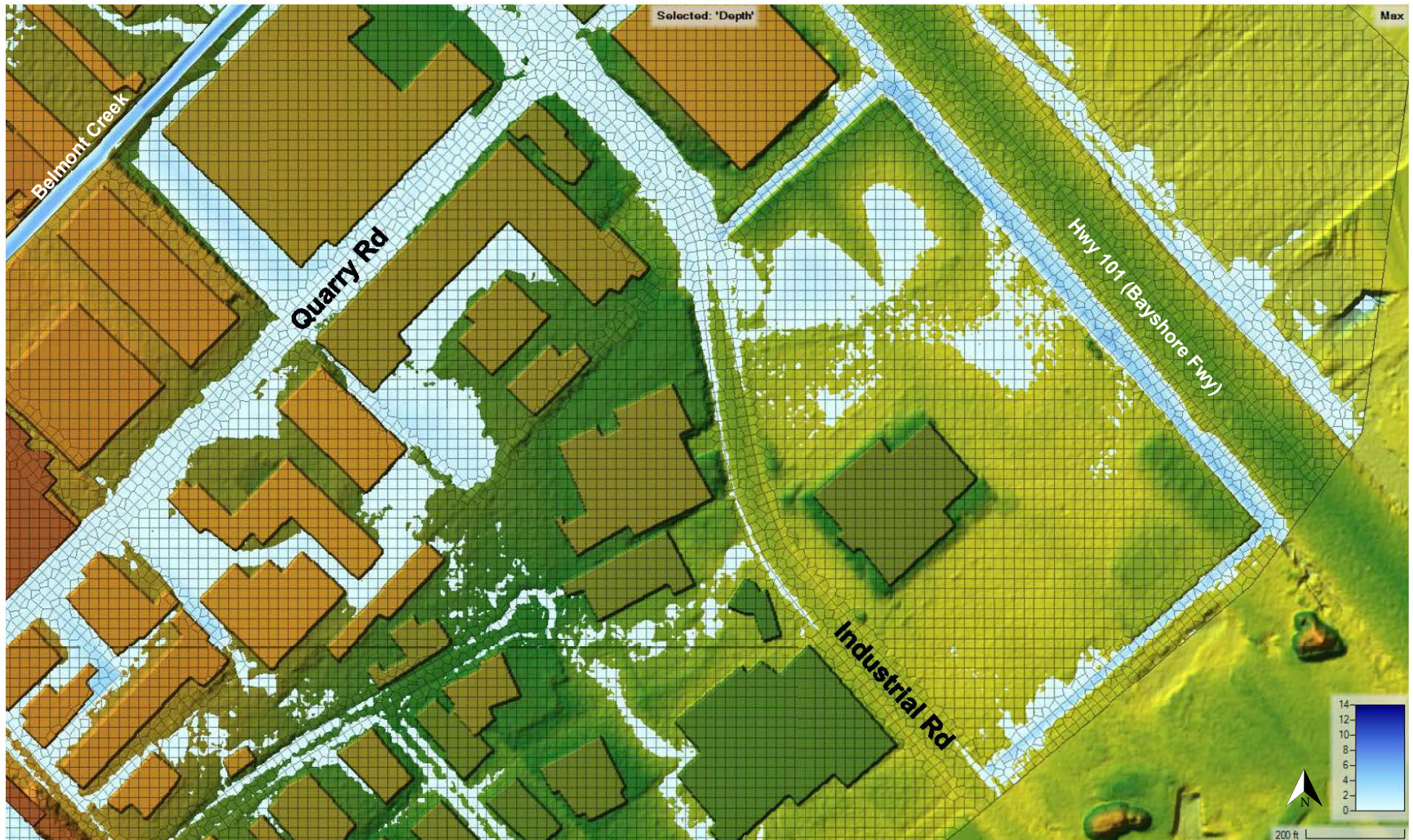
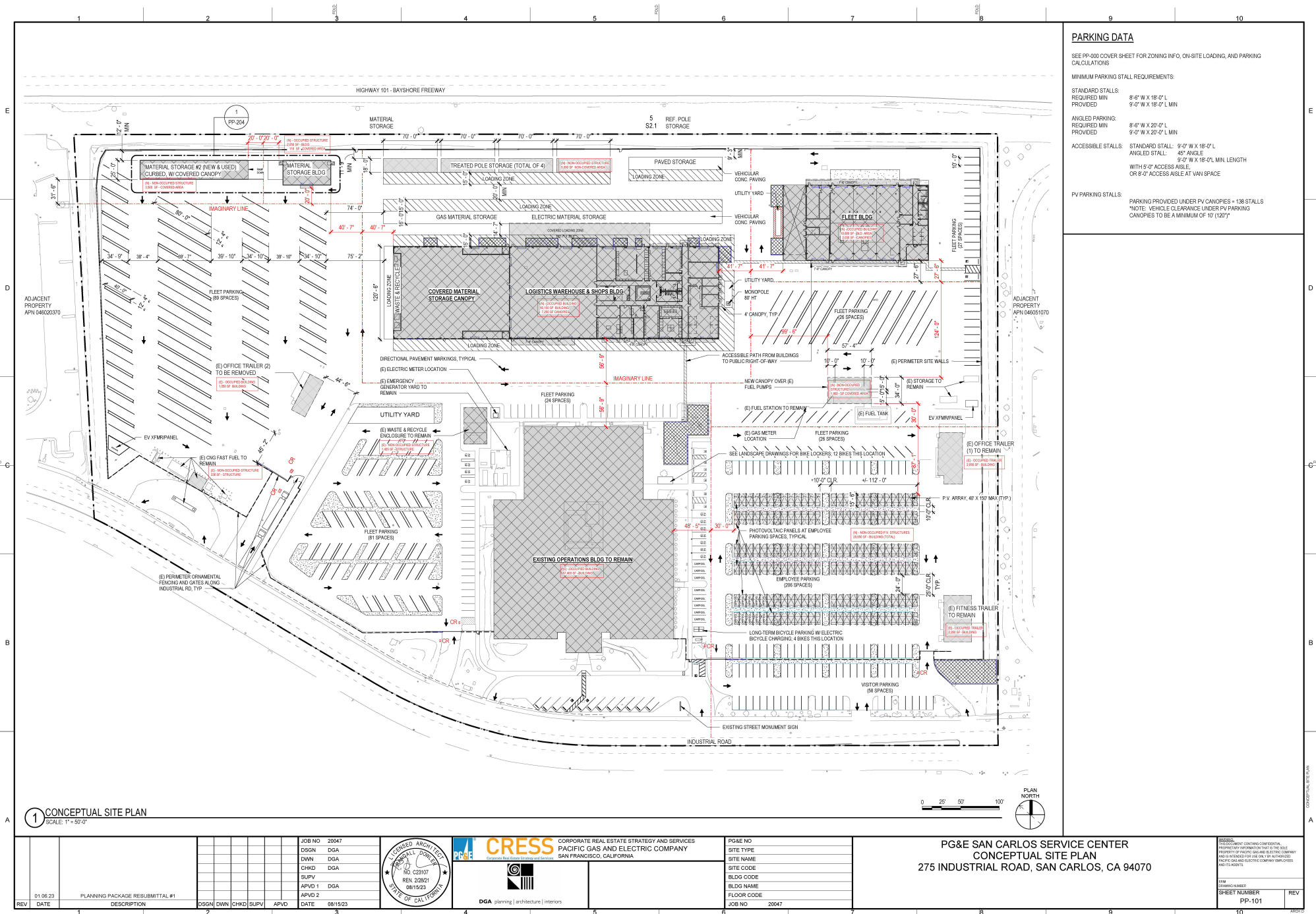


Figure 5. 100-Year: Existing Condition # 1 HEC-RAS 2-D Flood Map at 275 Industrial Project (Boundary Condition = FEMA WSE)

Appendix D.

Figure 4 Flooding During 100-Year Storm - Existing Conditions

275 Industrial Road PG&E San Carlos Service Center Project



PARKING DATA

SEE PP-000 COVER SHEET FOR ZONING INFO, ON-SITE LOADING, AND PARKING CALCULATIONS

MINIMUM PARKING STALL REQUIREMENTS:

STANDARD STALLS:
REQUIRED MIN PROVIDED: 8'-6" W X 18'-0" L
9'-0" W X 18'-0" L MIN

ANGLED PARKING:
REQUIRED MIN PROVIDED: 8'-6" W X 20'-0" L
9'-0" W X 20'-0" L MIN

ACCESSIBLE STALLS:
STANDARD STALL: 9'-0" W X 18'-0" L
ANGLED STALL: 45° ANGLE
9'-0" W X 18'-0" L MIN LENGTH
WITH 5'-0" ACCESS AISLE
OR 8'-0" ACCESS AISLE AT VAN SPACE

PV PARKING STALLS:
PARKING PROVIDED UNDER PV CANOPIES = 138 STALLS
NOTE: VEHICLE CLEARANCE UNDER PV PARKING CANOPIES TO BE A MINIMUM OF 10' (120")

Figure 5 Proposed Site Plan
275 Industrial Road PG&E San Carlos Service Center Project





1 AERIAL VIEW (FROM THE SOUTH DIRECTION)



3 AERIAL VIEW - EMPLOYEE PARKING WITH PV CANOPIES



2 AERIAL VIEW (FROM HWY 101 LOOKING SOUTH)



4 3D VIEW - EMPLOYEE PARKING (VIEW TOWARD LOGISTICS & FLEET BLDGS)

REV	DATE	DESCRIPTION	DSGN	DWN	CHKD	SUPV	APVD	JOB NO 20047	  CORPORATE REAL ESTATE STRATEGY AND SERVICES PACIFIC GAS AND ELECTRIC COMPANY SAN FRANCISCO, CALIFORNIA DGA planning architecture interiors	PG&E NO 15075	PG&E SAN CARLOS SERVICE CENTER 3D RENDERINGS 275 INDUSTRIAL ROAD, SAN CARLOS, CA 94070				<small>NOTES:</small> THESE DOCUMENTS CONTAIN CONFIDENTIAL INFORMATION AND INFORMATION THAT IS THE SOLE PROPERTY OF PG&E. IT IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM, WITHOUT THE WRITTEN PERMISSION OF PG&E.
								DGN: DGA CHKD: DGA SUPV: DGA APVD 1: DGA APVD 2: DGA DATE: 04/25/22		SITE TYPE: OFFICE - SO & CSO SITE NAME: SAN CARLOS CAMPUS SITE CODE: 2000 BLDG CODE: BLDG NAME: FLOOR CODE: 00 JOB NO: 20047					SHEET NUMBER: PP-401 REV:

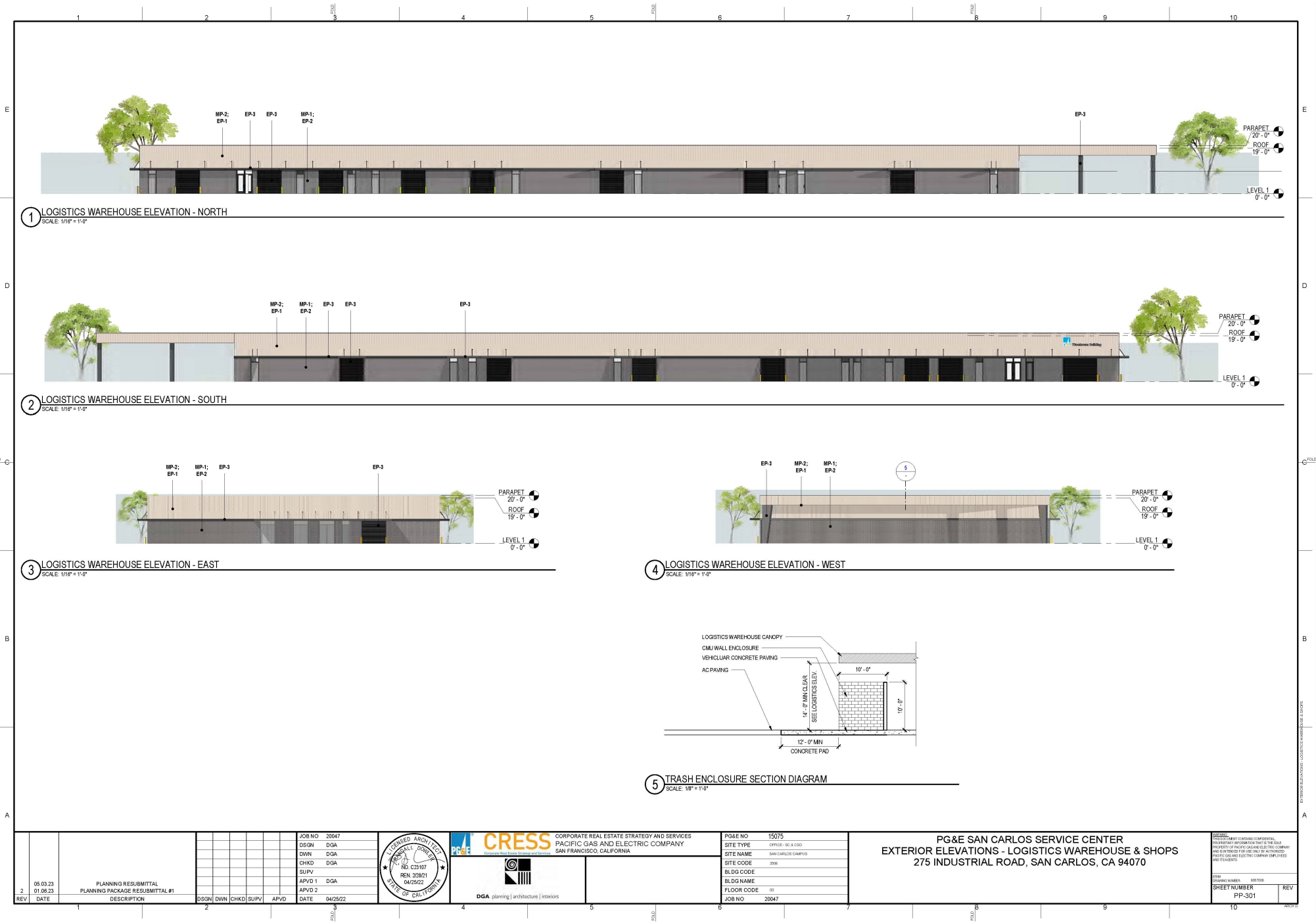


Figure 7 Logistics Warehouse & Shops Building Elevations
275 Industrial Road PG&E San Carlos Service Center Project

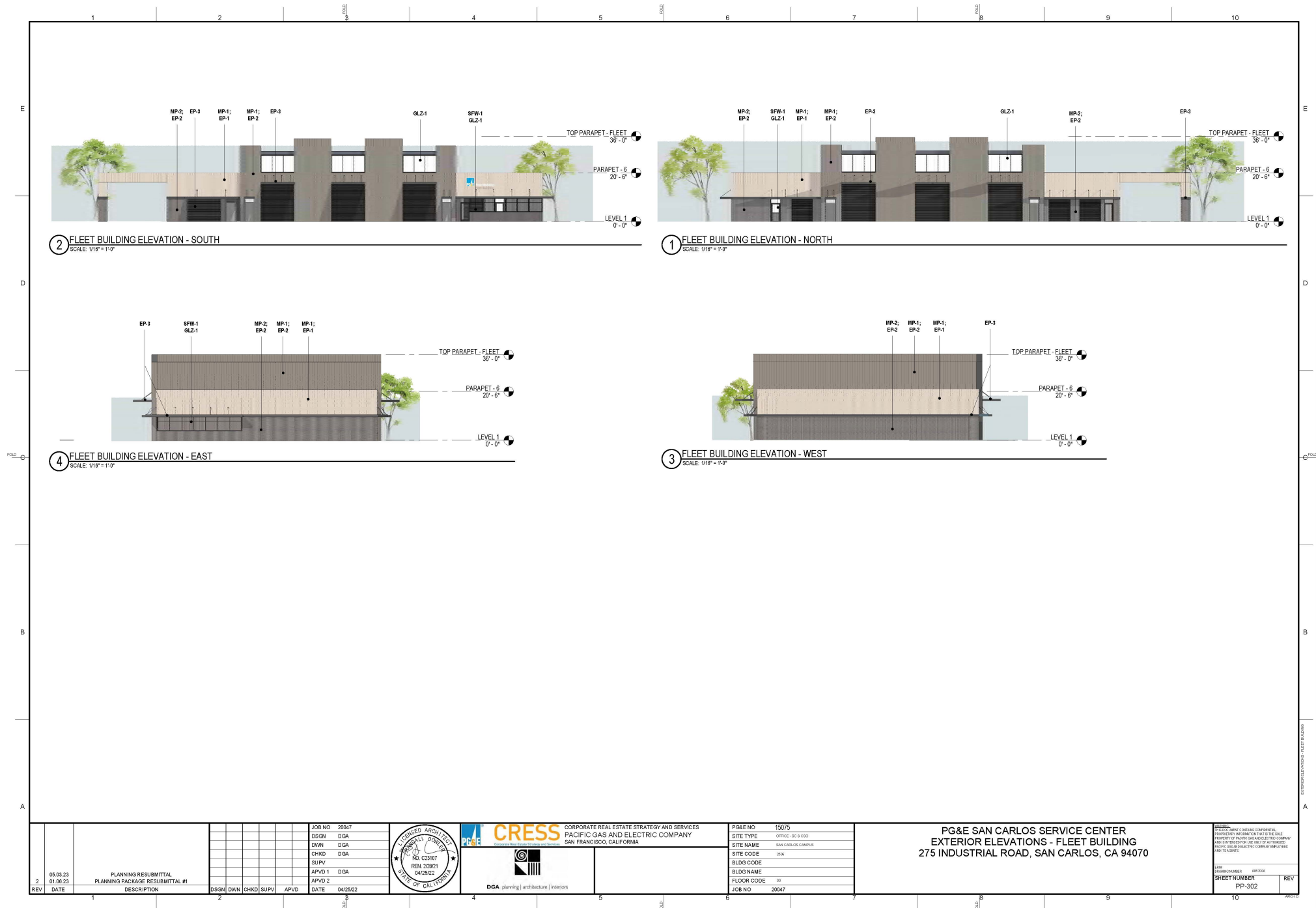


Figure 8 Fleet Building Elevations
275 Industrial Road PG&E San Carlos Service Center Project

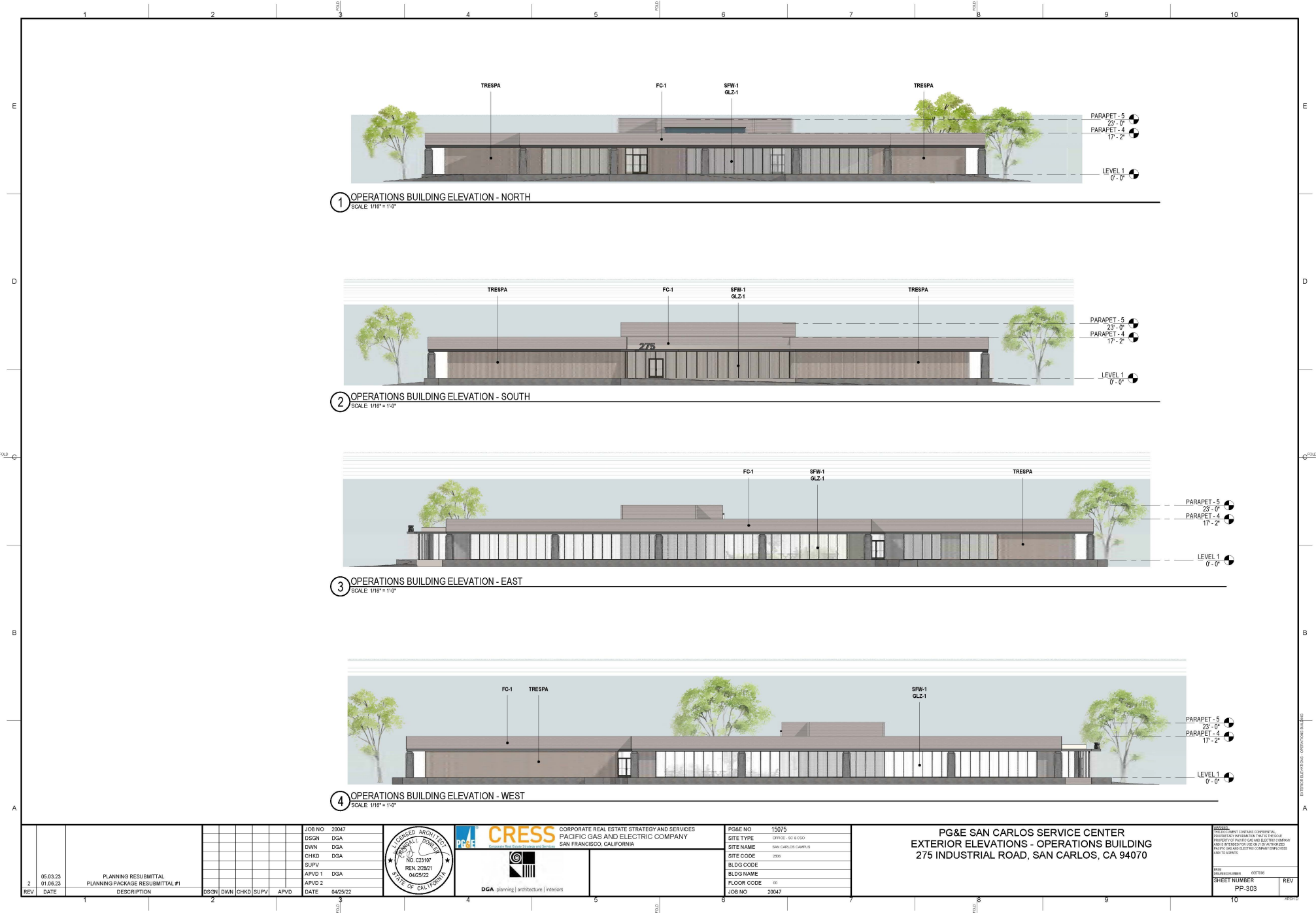
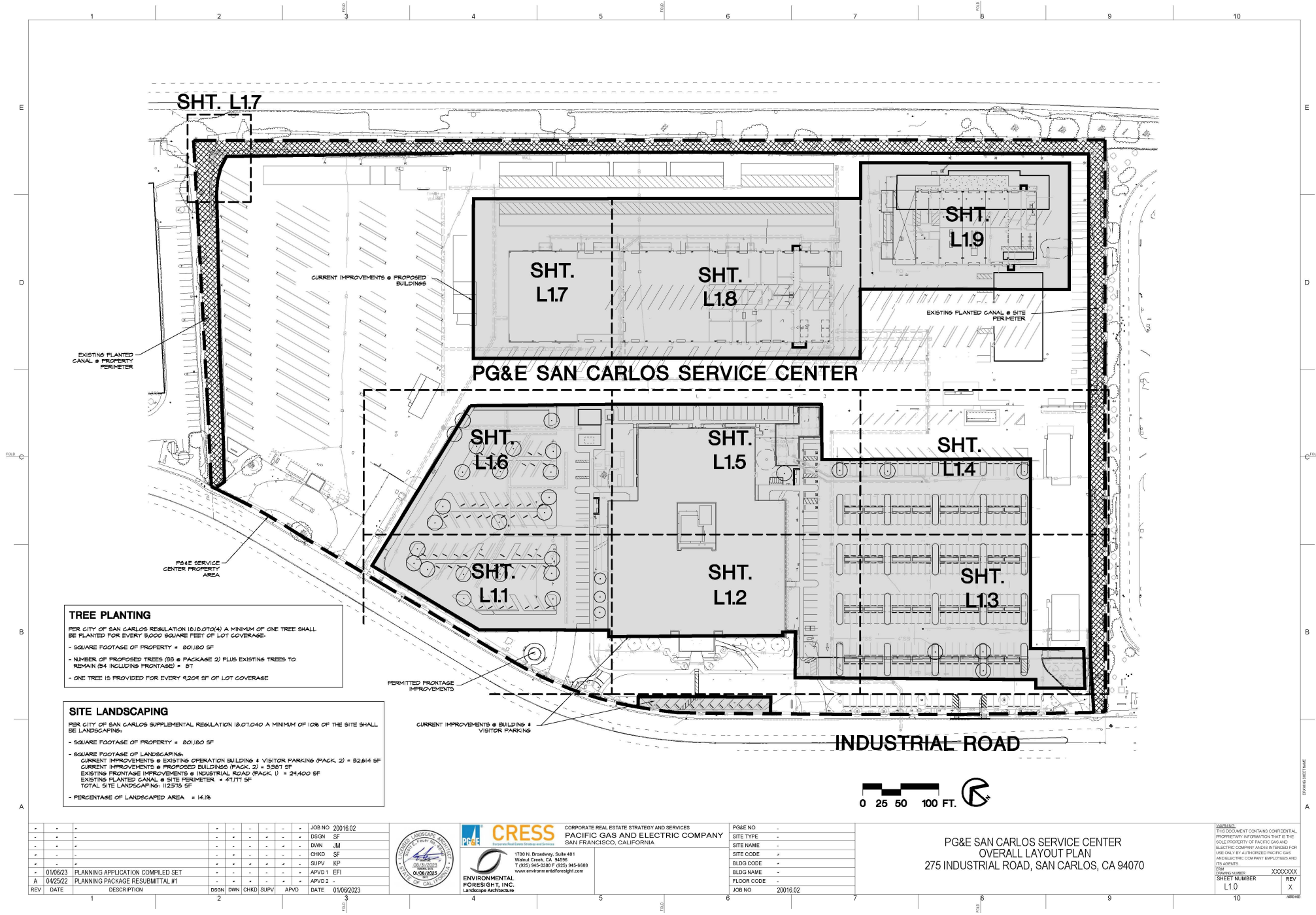
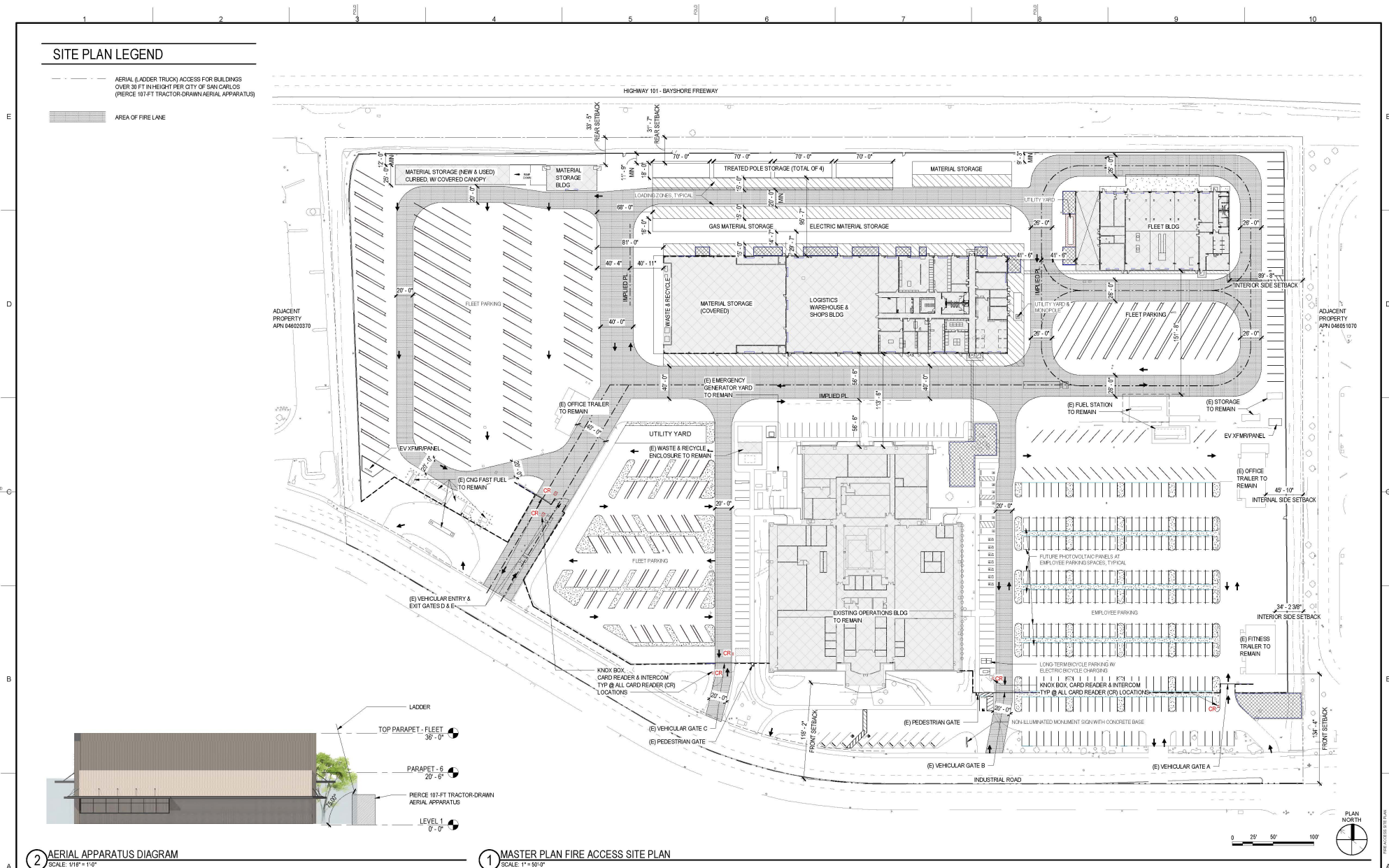


Figure 9 Operations Building Elevations
275 Industrial Road PG&E San Carlos Service Center Project





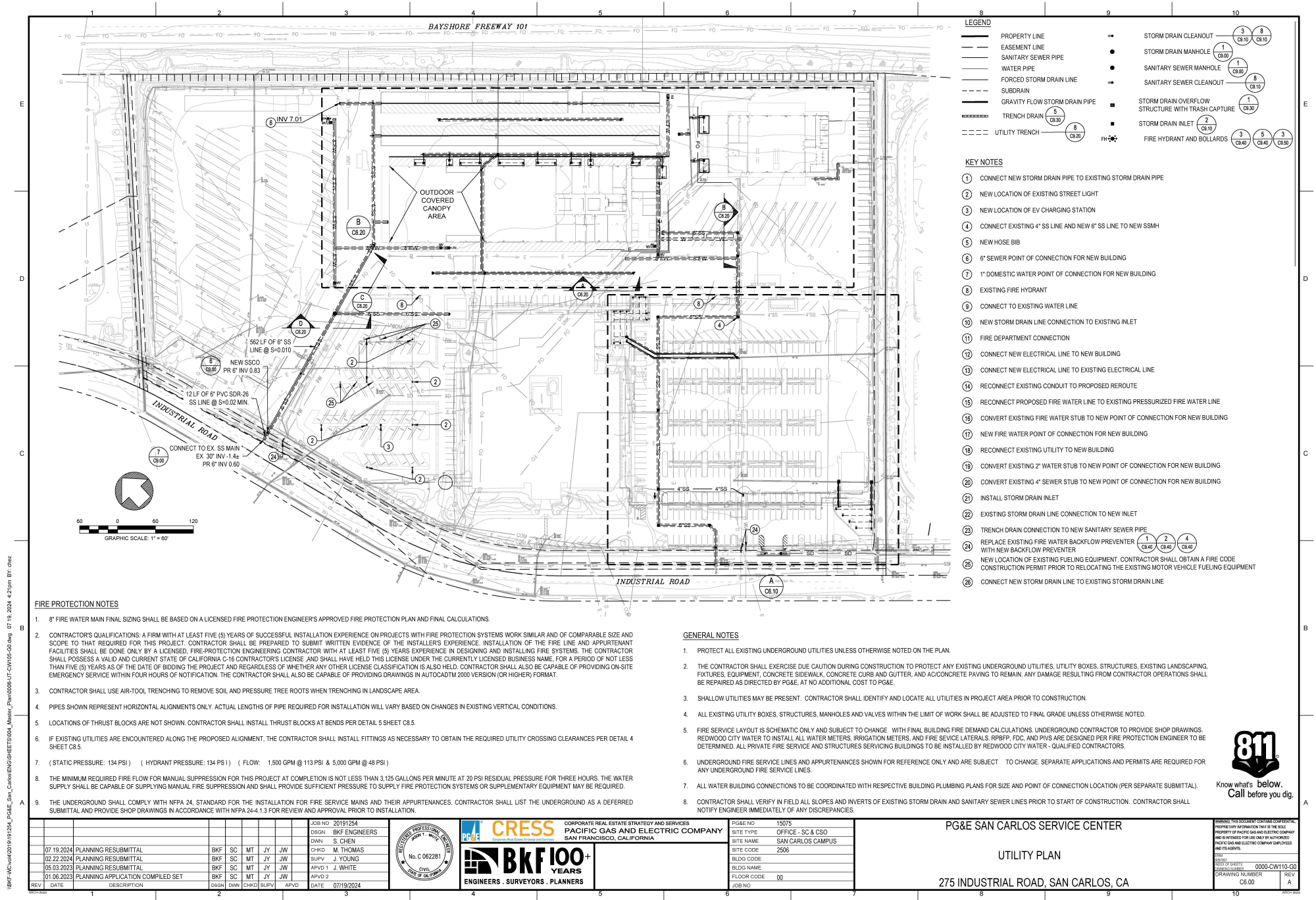
2 AERIAL APPARATUS DIAGRAM
SCALE: 1/16" = 1'-0"

1 MASTER PLAN FIRE ACCESS SITE PLAN
SCALE: 1" = 50'-0"

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Figure 12 Fire Access Plan
275 Industrial Road PG&E San Carlos Service Center Project



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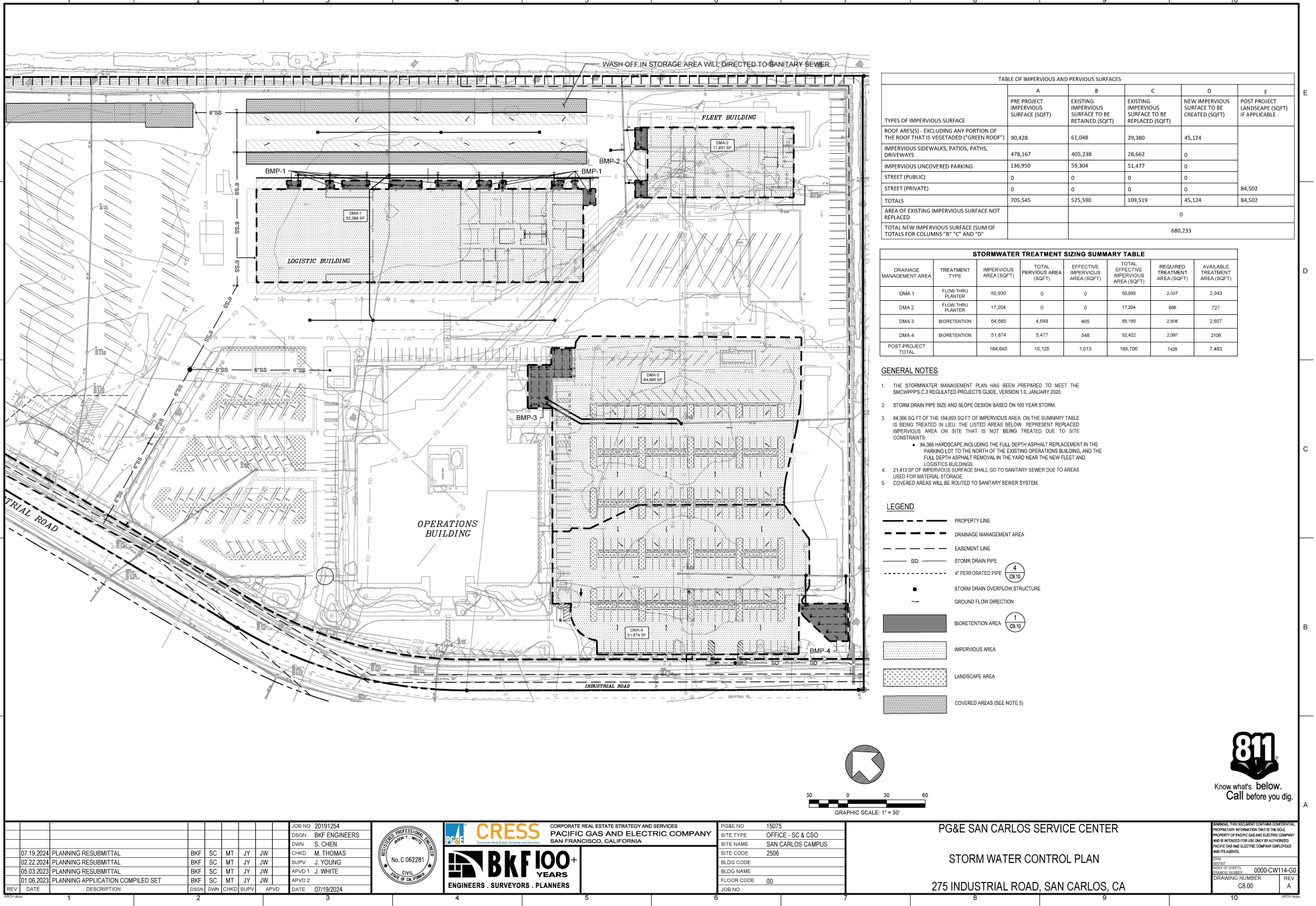


Figure 14 Stormwater Control Plan
275 Industrial Road PG&E San Carlos Service Center Project

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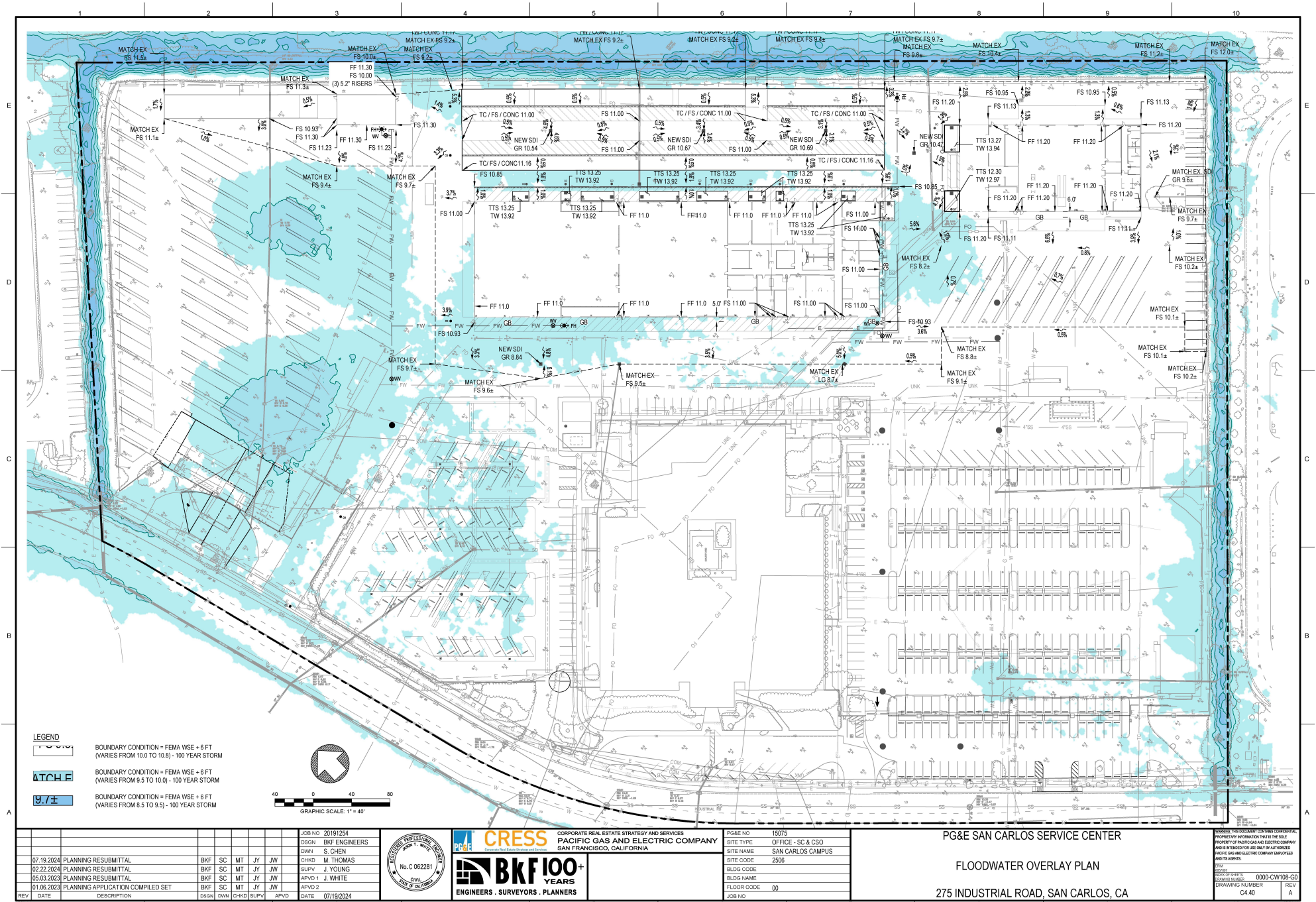


Figure 15 Floodwater Overlay Plan
275 Industrial Road PG&E San Carlos Service Center Project

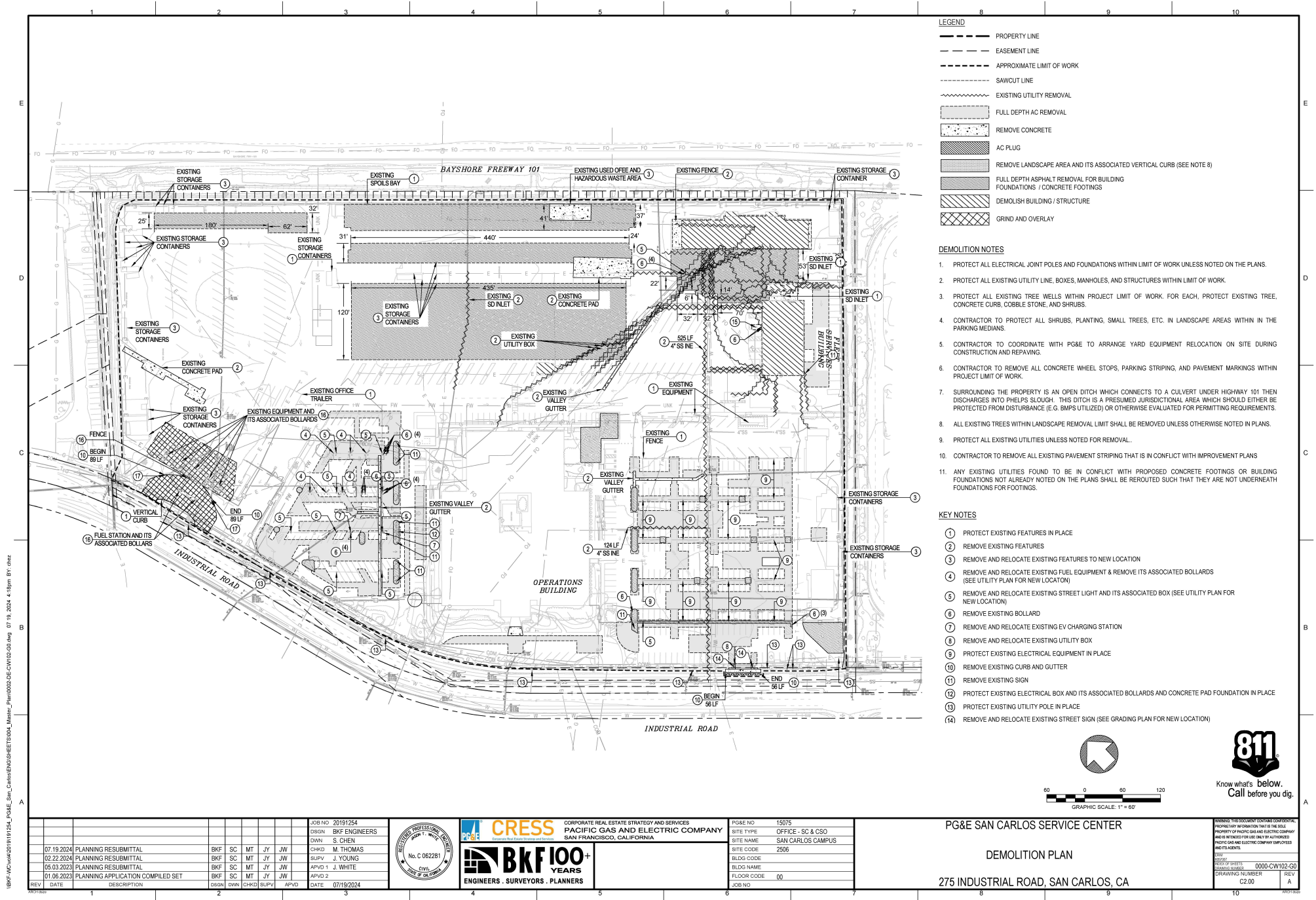
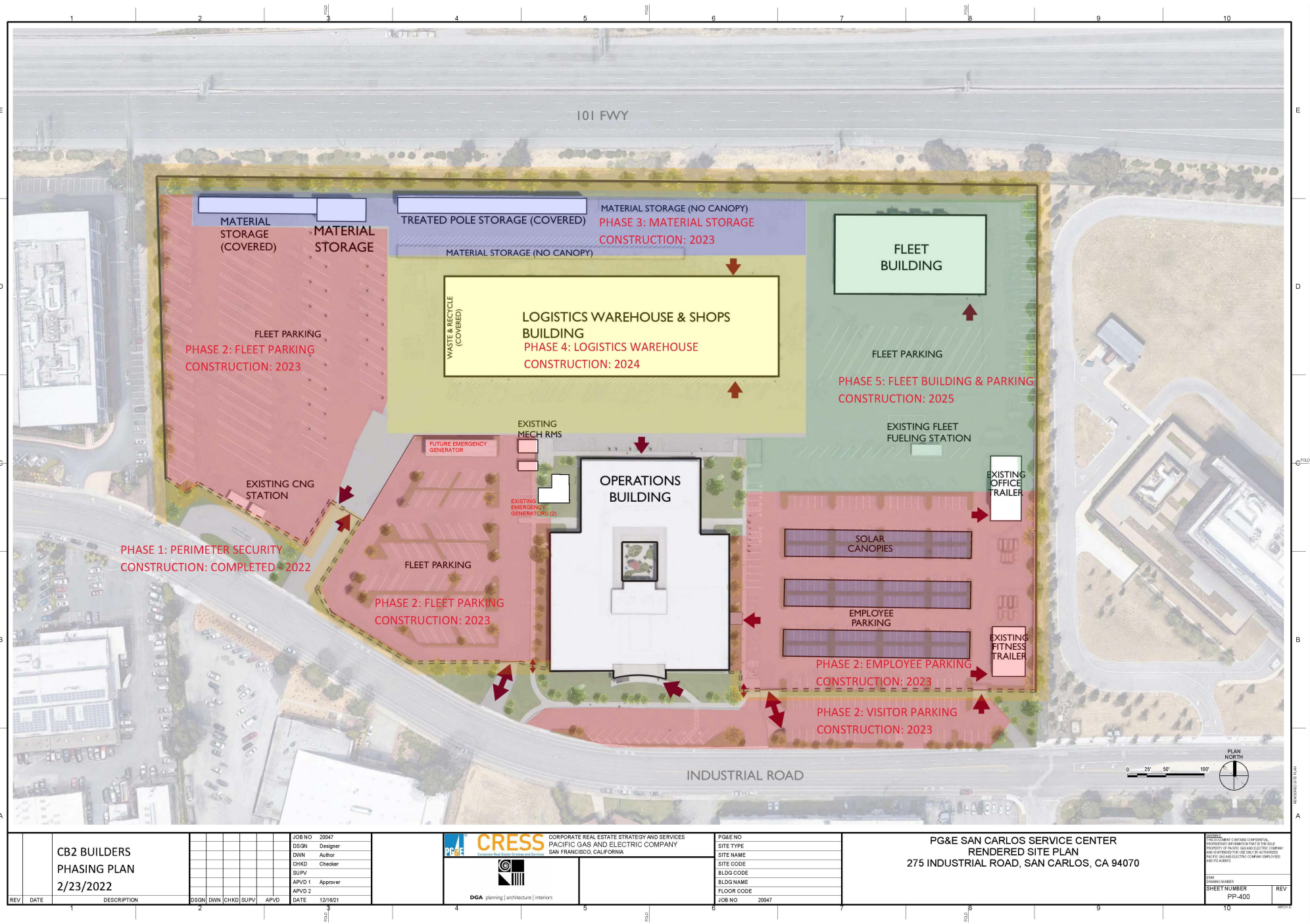


Figure 16 Demolition Plan

275 Industrial Road PG&E San Carlos Service Center Project







CB2 BUILDERS PHASING PLAN 2/23/2022		JOB NO 20047 DSGN Designer DWN Author CHKD Checker SUPV APVD 1 Approver APVD 2 DATE 12/18/21		 DGA planning architecture interiors		 CORPORATE REAL ESTATE STRATEGY AND SERVICES PACIFIC GAS AND ELECTRIC COMPANY SAN FRANCISCO, CALIFORNIA		PG&E NO SITE TYPE SITE NAME SITE CODE BLDG CODE BLDG NAME FLOOR CODE JOB NO 20047		PG&E SAN CARLOS SERVICE CENTER RENDERED SITE PLAN 275 INDUSTRIAL ROAD, SAN CARLOS, CA 94070		<small>THIS DOCUMENT CONTAINS CONFIDENTIAL INFORMATION AND IS NOT TO BE RELEASED TO THE PUBLIC OR USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN PERMISSION OF PG&E. IT IS THE PROPERTY OF PG&E AND IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM.</small>	
REV	DATE	DESCRIPTION	DSGN	DWN	CHKD	SUPV	APVD	DATE	SHEET NUMBER	REV			
1									PP-400				

Figure 17 Project Phasing Plan
 275 Industrial Road PG&E San Carlos Service Center Project

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Chapter 3. Environmental Analysis and Findings

1. **Project Title:** 275 Industrial Road PG&E Service Center Master Plan Project
2. **Lead Agency Name and Address:** City of San Carlos; 600 Elm Street, San Carlos, CA 94070
Contact Person and Phone Number: Chris Dacumos, Senior Planner; Phone: (707) 655-0370; email: cdacumos@goodcityco.com
3. **Project Location:** 275 Industrial Road, San Carlos, CA
4. **Project Sponsor's Name and Address:** Boris Letuchy, Pacific Gas & Electric Company, 77 Beale Street, San Francisco, CA, 94105
5. **General Plan Designation:** Planned Industrial
6. **Zoning:** Industrial Professional (IP)
7. **Description of the Project:** The proposed project would consist of updating the Master Plan for the existing PG&E San Carlos Service Center at 275 Industrial Road (APN 046-051-999). The updated Master Plan proposes the following changes to the main on-site facilities:
 - Demolish the existing, 9,534-square-foot Shops building and replace it with a 52,000-square-foot single-story Logistics Warehouse & Shops building consisting of shops and enclosed warehouse space, and another 7,250 sq. ft. of unconditioned covered storage for a total of approximately 59,250 sq. ft.
 - Demolish the existing 7,979-square-foot Fleet Maintenance building and replace it with a new 20,000-square-foot, single-story Fleet Maintenance building used to maintain and repair PG&E service vehicles, and another 2,030 sq. ft. of covered fleet storage for a total of approximately 22,030 sq. ft.
 - Renovate the existing, approximately 57,400-square-foot Operations building, which is a two-story building that serves primarily office and meeting room uses.
 - Construct a new, single-story Material storage building with 2,160 square feet of building area. An approximately 3,500 sq. ft. curbed material storage canopy area would be located adjacent to the new building.

The updated Master Plan also proposes the replacement and reconfiguration of parking lots, replacement of concrete and asphalt not associated with parking lots, removal of existing trees and replanting of trees and other landscaping improvements, construction of bioretention areas for capture and pre-treatment of stormwater runoff, removal or rerouting of some existing utilities and installation of new utilities, installation of new lighting fixtures and signage, and installation of photovoltaic panels in the replaced employee parking lot. The San Carlos Service Center currently serves large portions of San Mateo and Santa Clara counties acts as main hub for emergency services for the greater region for gas & electric utility service needs.

The project site is located at 275 Industrial Road in the northern portion of the City of San Carlos on a single parcel (Assessor Parcel Number (APN) 046-051-999) within the Northeast Specific Plan area.

The project site has a General Plan and zoning designation of Planned Industrial and Industrial Professional (IP) respectively. These General Plan and zoning designations generally include research and development, bio-tech, light industrial, flex, warehousing and related uses.

Buildout of the remaining phases (i.e., beginning with Phase 2, as Phase 1 was completed in 2022) Master Plan would commence in early 2025. Tentative estimates from the project Applicant indicate the final phase of the Master Plan, the Operations building renovations, would end in 2029. Construction would require the demolition of multiple on-site buildings and associated site features, including pavements, resulting in the net off-haul of approximately 2,138 CY of soil.

In total, the project proposes approximately 175,951 sq. ft., or 21.9 percent, of lot coverage. This total lot coverage includes 140,680 sq. ft. of total building area and 35,271 sq. ft. of non-occupied structure space. Of the proposed total building area, 133,450 sq. ft. would be considered an occupied area for the purpose of calculating the project's proposed floor area ratio (FAR). Approximately 112,578 sq. ft., or 14.1 percent of the site, would be landscaping, including bioretention areas and flow-through planters. The remainder of the site would consist of hardscape in the parking lots, driveways, drive aisles, and internal vehicular circulation routes, pathways, sidewalks, and open materials storage areas. The site's proposed FAR would be 0.166. The site would provide parking for approximately 537 motor vehicles, which would be used primarily by fleet service vehicles and employee passenger vehicles, and 27 bicycles. Vehicular access to the site would continue to be provided by eight driveways that run along the western portion of the project site and connect to Industrial Road.

The design of the new Logistics Warehouse & Shops building and Fleet building, and the renovated Operations building, would incorporate wood decor and fiber cement for exterior sidings. The buildings would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing. The main entrance of the Operations building would have an offset glazed system storefront.

The project would result in a total of 112,578 sq. ft. of on-site landscaping, or 14.1 percent of the site. Implementation of the proposed project would increase the amount of pervious area on the site by approximately 0.58 acres (25,312 sq. ft.).

8. **Surrounding Land Uses and Setting:** In the immediate vicinity of the project site, Highway 101 borders the site to the northeast, a multi-tenant life science building, including laboratory testing facilities, borders the site to the northwest, Sutter Health Urgent Care-San Carlos Center and Palo Alto Medical Foundation Laboratory border the site to the southeast, and Industrial Road borders the site to the west/southwest. Open drainage ditches are located along the perimeter of the project site on the north, east, and south sides.

The project site is fully developed and there are drainage ditches on three sides of the site (north, south, and east sides) immediately adjacent to the perimeter wall that surrounds the site.

9. **Other Public Agencies Whose Approval is Required:** The project does not require permits from any agency other than the City of San Carlos.
10. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?** The City of San Carlos has not received any requests from a Native American tribe traditionally and culturally affiliated with the project area. Thus, no consultation has been conducted.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

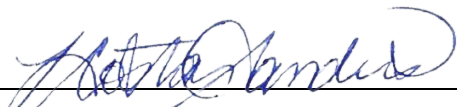
The environmental factors checked below would be potentially affected by this project, as indicated by the checklist on the following pages.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Agricultural and Forestry Resources	<input checked="" type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Air Quality	<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Transportation
<input checked="" type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Land Use/Planning	<input checked="" type="checkbox"/>	Tribal Cultural Resources
<input checked="" type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Utilities/Service Systems
<input type="checkbox"/>	Energy	<input checked="" type="checkbox"/>	Noise	<input type="checkbox"/>	Wildfire
<input checked="" type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Population/Housing	<input checked="" type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed Project COULD have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.



Signature

October 29, 2024

Date

Lisa Costa Sanders

Printed Name

Principal Planner

Title

City of San Carlos

Agency

3.1 AESTHETICS

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

3.1.1 Environmental Setting

Scenic Views

San Carlos has varied topography, which ranges from land at sea level in the eastern portion of the city to the hills in the western portion of the city that have elevations of up to 900 feet. The hillsides and ridgelines that comprise the city's diverse landscape provide a rich array of scenic resources and afford numerous vantage points from which scenic vistas can be enjoyed. Views of the surrounding hills, San Francisco Bay and the East Bay hills can be accessed in many areas west of Alameda de las Pulgas, including City parks and open space and existing residential neighborhoods (San Carlos 2009). The project site is a small, distant component of the views of San Francisco Bay from the San Carlos and Belmont hills.

From the lower portions of San Carlos, scenic views of the Santa Cruz Mountains to the southwest are present but limited due to the flat topography. Views of the mountain range are partially obstructed from the street-level view by urban development, mature trees, and intervening hillsides to the southwest.

The San Carlos General Plan does not identify any official scenic vistas. The nearest State scenic highway to the project site is I-280, approximately 2.7 miles west of the project site (Caltrans 2021). The project site is not visible from I-280.

Gateways to the City

Gateways into the City are described in the San Carlos General Plan. Creating aesthetically pleasing gateways is an important component of land use planning and community design that contributes to a city's character and sense of place. Gateways are locations that announce to a

visitor or resident that they are entering the city or a unique neighborhood within the city. Features associated with gateways can include signs, structural elements such as towers or fences or walls, landscaping, architecturally significant buildings, and natural features such as a row of trees. Gateways in San Carlos have been classified into two categories: primary and secondary. Primary gateways are the major regional entry points into the city on roadways or transportation routes. Secondary gateways are more local entry points into the city from nearby cities including Belmont and Redwood City (San Carlos 2009).

The San Carlos General Plan identifies the Holly Street east of El Camino as a Primary Gateway and specifically mentions the Holly Street at U.S. Highway 101 and Industrial Road as the primary access route from Highway 101 to San Carlos and that high traffic volumes and a mixture of land uses, including residential, industrial, and commercial, do not effectively announce to visitors their entrance to San Carlos even though a small monument feature is installed (San Carlos 2009). The General Plan also identifies Industrial Road at the San Carlos and Belmont border as a secondary gateway. The project site is located between these two identified gateway points. The Northeast Specific Plan maps show a local gateway at the intersection of Industrial Road and Quarry Road, north of the project site. Thus, the project site is located between a primary and secondary gateway identified in the General Plan and near a local gateway identified on the Northeast Specific Plan map.

Visual Character of Site and Surrounding Area

As discussed in Chapter 2, Project Description, the project site is currently developed with an existing PG&E Shops building, Fleet building, Operations building, and accessory buildings. The site is almost entirely hardscaped; the portions of the site that are not developed with structures are paved and serve as parking spaces, drive aisles, or materials storage areas (see Figure 3 – Existing Site Photos). There are a number of trees on the project site located in the western half of the site in landscaped areas adjacent to the Operations Building, distributed throughout parking areas, and along Industrial Road. Most of the on-site landscaped area is located in a noncontiguous strip along Industrial Road that buffers the majority of the project site from the roadway. This strip is bordered by 8-foot-high ornamental fencing with metal mesh. An 8-foot-high perimeter security wall made of precast concrete connects to the site entry fencing and extends to enclose the project site on its northwestern, eastern, and southeastern boundaries. Unnamed, engineered, natural bottom channels run along the southern, northern, and eastern borders of the project site.

The project site, located between Industrial Road to the west and Hwy 101 to the east and is located in a highly urbanized setting in the northeast portion of the City. Industrial Road is developed with commercial and light industrial uses, with the Sutter Health/Palo Alto Medical Foundation Urgent Care Center and Laboratory boarding the site to the southeast. The following facilities are currently located across Industrial Road to the west: Delta Star (transformer manufacturer), Advantage Converting (manufacturing), Honda San Carlos (vehicle service and parts), and Anwita Biosciences (medical research). Single-family residences are located approximately 700 feet to the southwest of the project site across Industrial Road. The San Carlos Airport is located approximately 0.33 miles to the southeast of the project site.

Existing light sources on and near the site include exterior building lights, lights in the adjacent parking lot at 201 Industrial Avenue, and streetlights on Industrial Road. There are no sources of substantial daytime glare near the project site; the exteriors of the buildings near the project site consist mostly of concrete and other, non-reflective materials. The Honda Dealership may produce substantial nighttime lighting, as car dealerships need well-lit parking lots to sell cars at night.

Northeast Area Specific Plan

This City of San Carlos is undertaking the preparation of the Northeast Area Specific Plan which includes the area between El Camion Real to the west, Highway 101 to the east, the San Carlos city boundary at Belmont Creek to the north, and the industrial area south of Taylor Way. The PG&E Service Center is in the eastern portion of the Northeast Specific Plan area. This Plan is intended to plan for change in the northeast area in a way that supports existing and new businesses, residents, and the overall community. The plan is in the early stages of development and there are not any land use or design policies established at this time.

3.1.2 Regulatory Setting

Local Regulations

City of San Carlos Zoning Ordinance

The City of San Carlos Zoning Ordinance, Title 18 of the San Carlos Municipal Code, contains text establishing districts for basic land uses including open space, public, residential, commercial, and industrial uses, and setting special regulations for design standards and other specific concerns. The City of San Carlos Zoning Ordinance also describes procedures for processing discretionary approvals.

The following sections of the San Carlos Zoning Ordinance are applicable to the proposed project:

- Table 18.07.030 identifies the development standards for Industrial Professional districts. Among other standards, it establishes the following:
 - Maximum Height: 100 Feet
 - Minimum Setbacks
 - Front: 20 Feet
 - Interior Side: 0 Feet
 - Street Side: 5 Feet
 - Rear: 0 Feet
- Chapter 18.29 of the San Carlos Municipal Code establishes design review procedures to ensure that new development supports the General Plan's goal of creating a vibrant pedestrian- and transit-oriented core and distinctive neighborhoods and districts with a diversity of building types that provide continuity in scale and character with appropriate transitions, where needed. The specific purposes of the design review process are to:
 - Promote excellence in site planning and design and the harmonious appearance of buildings and sites;
 - Ensure that new and modified uses and development will be compatible with the existing and potential development of the surrounding area; and
 - Supplement other City regulations and standards in order to ensure control of aspects of design that are not otherwise addressed.
 - Section 18.29.060 provides the following design review criteria, which projects must satisfy to the extent that they are applicable:
 - The overall design of the project including its scale, massing, site plan, exterior design, and landscaping will enhance the appearance and features of the project site and surrounding natural and built environment.

- The project design is appropriate to the function of the project and will provide an attractive and comfortable environment for occupants, visitors, and the general community.
- Project details, materials, signage and landscaping are internally consistent, fully integrated with one another, and used in a manner that is visually consistent with the proposed architectural design.
- The project has been designed to be compatible with neighboring development by avoiding big differences in building scale and character between developments on adjoining lots in the same zoning district and providing a harmonious transition in scale and character between different districts.
- The project contributes to the creation of an attractive and visually interesting built environment that includes a variety of building styles and designs with well-articulated structures that present varied building facades, roof lines, and building heights within a unifying context that encourages increased pedestrian activity and promotes compatibility among neighboring land uses within the same or different districts.
- The design of streetscapes, including street trees, lighting, and pedestrian furniture, is consistent with the character of activity centers, commercial districts and nearby residential neighborhoods.
- The proposed design is compatible with the historical or visual character of any area recognized by the City as having such unified character.
- The project design preserves major public views and vistas from major public streets and open spaces and enhances them by providing areas to stroll, benches to rest and enjoy views, and similar amenities.
- Parking areas are designed and developed to buffer surrounding land uses; complement pedestrian-oriented development; enhance the environmental quality of the site, including minimizing stormwater run-off and the heat-island effect; and achieve a safe, efficient, and harmonious development.
- Lighting and lighting fixtures are designed to complement buildings, be of appropriate scale, provide adequate light over walkways and parking areas to create a sense of pedestrian safety, and avoid creating glare.
- The proposed building design and landscaping supports public safety and security by allowing for surveillance of the street by people inside buildings and elsewhere on the site.
- Landscaping is designed to be compatible with and enhance the architectural character and features of the buildings on site, and help relate the building to the surrounding landscape. Proposed planting materials avoid conflicts with views, lighting, infrastructure, utilities, and signage.

San Carlos General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following relevant aesthetics-related policies are from the General Plan's Land Use Element.

- **Policy LU-6.6:** Encourage new development on the East Side to feature high quality architecture that reinforces the character of the area.

- **Policy LU-8.1:** Require all development to feature high quality design that enhances the visual character of San Carlos.
- **Policy LU-8.2:** Ensure that new development is sensitive to the character of adjacent structures and the immediate neighborhood.
- **Policy LU-8.3:** Encourage design features and amenities in new development and redevelopment, including, but not limited to:
 - a. Interconnected street layout.
 - b. Clustering of buildings.
 - c. Landscaping on each lot.
 - d. Visual buffers.
 - e. Facilitation of pedestrian activity.
 - f. Distinctiveness and variety in architectural design.
- **Policy LU-8.15:** Require the undergrounding of all utilities, or a deferred improvement agreement, in conjunction with new construction and encourage the undergrounding of existing utilities where feasible.
- **Policy LU-8.16:** Require high quality signage through design, use of materials and colors compatible with and complementary to the architectural character of the building(s) and surrounding area.
- **Policy LU-8.17:** Require telecommunications and utility facilities to be sensitively placed, shielded, screened or lessened from view to the greatest extent possible through design review.
- **Policy LU-8.18:** Encourage “green building” practices in new development and redevelopment, such as those that make a building more energy efficient and reduces its effect on human health and the environment through better siting, design, construction, maintenance and operation.
- **Policy LU-8.20:** Require all new residential multi- family residential, commercial and industrial projects subject to design review by the appropriate decision- making body for compliance with site planning, architecture, signing and landscaping criteria prior to approval.
- **Policy LU-9.9:** Encourage the design of development to minimize the obstruction of significant views of the San Francisco Bay, the western hills, or other significant natural vistas to the greatest extent possible.

3.1.3 Discussion

Would the project:

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

Less Than Significant Impact. The project site is located within an urbanized area of the city and is not located in a scenic area, nor is it considered part of an officially designated scenic vista. However, the San Carlos General Plan states that views of the San Francisco Bay can be accessed in many areas west of Alameda de las Pulgas, including City parks and open space and existing residential neighborhoods (San Carlos 2009). The project site is a small, distant component of the views of San Francisco Bay from the San Carlos and Belmont hills. The project would not introduce any buildings taller than the existing 23-foot high, 2-story buildings.

The proposed buildings will be designed consistent with City General Plan and Zoning policies regarding use of high-quality building materials, installation of landscaping, and conformance with the City's lighting ordinance.

The proposed buildings would not block views of San Francisco Bay because of the elevation difference between the project site and the viewers in the San Carlos and Belmont hills, and because of the intervening distance. The project would not significantly increase night lighting or glare. The project would have a less than significant impact on scenic views from the San Carlos and Belmont hills of the Bay shoreline and San Francisco Bay.

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

No Impact. The nearest State Scenic Highway to the project site is I-280, approximately 2.7 miles to the west of the project site. Development of the proposed project would not damage scenic resources within a State Scenic Highway. No impact would occur.

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

Less than Significant Impact. The project site is located in an urbanized area. Development of the proposed project would result in an improvement to the existing visual character of the project site. As described in the Project Description, the proposed project would replace the older, existing buildings with new buildings with larger square footage but with improved exterior building materials. The project would go through the City's Design Review process to ensure site and building design is consistent with the requirements for General Plan designation of Planned Industrial and the development standards of the Industrial Professional Zoning designation.

The design of the new Logistics Warehouse & Shop building, the new Fleet building, and the Operations building exterior renovations would incorporate wood decor Trespa pura sidings and fiber cement for exterior sidings. The buildings would use a metal wall system with a combination of exposed fastener-type and matrix-type metal panels with polyvinylidene fluoride (PVDF) coating. Exterior paint colors would include colors such as sandstone, toupestone, and spartan bronze. Windows would consist of clear insulating glass with vision glazing. The main entrance to the Operations building would consist of an offset glazed system storefront with bronze accents.

The project would also install new landscaping along Industrial Road and around the Operations building, and the new stormwater drainage basins would also be landscaped.

The project would be consistent with relevant General Plan land use policies related to building and site design (LU-6.6, LU-8.1, LU-8.2, LU-8.3, LU-8.15 through LU-8.18, LU-8.20, LU-9.9, and LU-11.1) which are intended to ensure that new development features high quality design that enhances the visual character of San Carlos.

The project would be subject to City Design Review, which would ensure consistency with applicable development regulations (e.g., compatible with neighboring development). The project would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

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

Less than Significant Impact. Existing light sources associated with the PG&E Service Center include pole mounted parking lot lighting, and exterior building lights throughout the site. There are no sources of substantial daytime glare within the project site; the exteriors of the buildings on the project site consist mostly of concrete and other, non-reflective materials. There are no nearby land uses that would be sensitive to nighttime lighting in the immediate project vicinity. The closest residential area is approximately 745 feet south of the project site boundary on Fairfield Drive and Northwood Drive.

As described in the Project Description, the proposed site lighting upgrades include new light poles installed in the employee, visitor, and fleet parking lots, and along site entry/exit driveways. The large employee parking lot southeast of the Operations building would be improved with new PV carports. The PV panels would have integrated lighting to illuminate the covered parking stalls to Code-required light levels. Additionally, the new buildings would have mounted luminaires that would contribute to overall site illumination.

All exterior lighting would be designed and installed according to the requirements of San Carlos Municipal Code 18.15.070 Lighting and illumination. Table 18.15.070-B (4): Maximum Height of Lighting Standards establishes a maximum pole height in Industrial areas of 20 feet within 100 feet of any street frontage and 25 feet high in any other location. Section 18.15.070.C Control of Outdoor Artificial Lighting establishes requirements for fixture types, luminaries, glare, and light trespass.

As the project would be designed consistent with the City's Municipal Code requirements for Outdoor Exterior Lighting and there are no nearby sensitive receptors to night lighting, the project would have a less than significant impact on nighttime light and glare.

3.1.4 References

- Caltrans. 2021. "California State Scenic Highway System Map." Accessed on December 14, 2021 at <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.
- City of San Carlos. 2009. San Carlos General Plan: Envision 2030. Adopted October 12, 2009.
- _____. 2021. San Carlos Municipal Code Title 18.5: Zoning. Revised 3/21.

3.2 AGRICULTURAL AND FOREST RESOURCES

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

3.2.1 Environmental Setting

The project site is located in an urbanized area of the City and is surrounded by light industrial and commercial uses, medical offices, and roadways. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as Urban and Built-up Land (CDOC, 2019).

3.2.2 Discussion

Would the project:

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

- b) **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**
- c) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**
- d) **Result in the loss of forest land or conversion of forest land to non-forest use?**
- e) **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. (Responses a – e). As discussed in Chapter 2, Project Description, the project site is located in an urbanized area of the City. There are no forest lands or agricultural lands on or near the proposed project site. The project would not convert or cause the conversion of any farmland or forest land to a non-agricultural/non-forest use. The proposed project would not impact Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or land under a Williamson Act contract. Thus, the project would not result in impacts to any agricultural or forestry resources. No impact would occur.

3.2.3 References

California Department of Conservation (CDOC). 2019. Farmland Mapping and Monitoring Program. San Mateo County Important Farmland 2018. Published September 2019.

3.3 AIR QUALITY

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

3.3.1 Environmental Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. Physical atmospheric conditions such as air temperature, wind speed, and topography influence air quality.

Criteria Air Pollutants

Federal, state, and local governments control air quality through the implementation of laws, ordinances, regulations, and standards. The federal and state governments have established ambient air quality standards for “criteria” pollutants considered harmful to the environment and public health. National Ambient Air Quality Standards (NAAQS) have been established for carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), fine particulate matter (particles 2.5 microns in diameter and smaller, or PM_{2.5}), inhalable coarse particulate matter (particles 10 microns in diameter and smaller, or PM₁₀), and sulfur dioxide (SO₂). California Ambient Air Quality Standards (CAAQS) are more stringent than the national standards for the pollutants listed above and include the following additional pollutants: hydrogen sulfide (H₂S), sulfates (SO_x), and vinyl chloride. In addition to these criteria pollutants, the federal and state governments have classified certain pollutants as hazardous air pollutants (HAPs) or toxic air contaminants (TACs), such as asbestos and diesel particulate matter (DPM).

San Francisco Bay Area Air Basin

The project site is located in the San Francisco Bay Area Air Basin (SFBAAB), an area of non-attainment for both the 1-hour and 8-hour state ozone standards, and the national 24-hour PM_{2.5} standard. The SFBAAB is comprised of nine counties: all of Alameda, Contra Costa, Santa Clara, San Francisco, San Mateo, Marin, Napa, and the southern portions of Solano and Sonoma. In San Mateo County, PM_{2.5} exceeds the national standard only on about one day each year (BAAQMD 2023a).

The San Francisco Bay area is generally characterized by a Mediterranean climate with warm, dry summers and cool, damp winters. During the summer daytime high temperatures near the

coast are primarily in the mid-60s, whereas areas farther inland are typically in the high-80s to low-90s. Nighttime low temperatures on average are in the mid-40s along the coast and low to mid-30s inland.

The Mediterranean climate is seen along most of the West Coast of North America and is primarily due to a (typically dominating) high-pressure system, located off the west coast of North America, over the Pacific Ocean. During the summer and fall months the high-pressure ridge is at its strongest and therefore provides a more stable atmosphere. Warm temperatures and a stable atmosphere associated with the high-pressure ridge provide favorable conditions for the formation of photochemical pollutants (e.g., O₃) and secondary particulates (e.g., nitrogen oxides (NO_x) and SO₂).

Varying topography and limited atmospheric mixing throughout the SFBAAB restrict air movement resulting in reduced dispersion and higher concentrations of air pollutants. The SFBAAB is most susceptible to air pollution during the summer when cool marine air flowing through the Golden Gate can become trapped under a layer of warmer air (a phenomenon known as an inversion) and is prevented from escaping the valleys and bays created by the Coast Ranges.

Sensitive Receptors

A sensitive receptor is defined by the Bay Area Air Quality Management District (BAAQMD) as a facility or land use that include members of the population that are particularly sensitive to the effects of air pollution, such as children, seniors, or people with illnesses (BAAQMD 2023a). These typically include residences, hospitals, and schools. The sensitive receptors within 1,000 feet of the project site include:

- Residential dwelling units, the closest of which are approximately 745 feet south of the project site boundary on Fairfield Drive and Northwood Drive.
- The Sutter Health Urgent Care-San Carlos Center and Palo Alto Medical Foundation (PAMF) Laboratory and outpatient medical facility, approximately 185 feet south of the project site.
- Laureola Park, approximately 2,200 feet south of the project site.

The closest school to the project site is Central Middle School, approximately 0.96 mile south of the project site.

3.3.2 Regulatory Setting

State Regulations

CARB In-Use Off-Road Diesel Vehicle Regulation

CARB's In-Use Off-Road Diesel Equipment regulation is intended to reduce emissions of NO_x and PM from off-road diesel vehicles, including construction equipment, operating within California. The regulation imposes limits on idling; requires reporting equipment and engine information and labeling of all vehicles reported; restricts adding older vehicles to fleets; and requires fleets to reduce their emissions by retiring, replacing, or repowering older engines or installing exhaust retrofits for PM. The requirements and compliance dates of the off-road regulation vary by fleet size, and large fleets (fleets with more than 5,000 horsepower) had to meet average targets or comply with Best Available Control Technology requirements since 2014.

CARB also has off-road anti-idling regulations affecting self-propelled diesel-fueled vehicles 25 horsepower and up. The off-road anti-idling regulations limit idling on applicable equipment to

no more than five minutes, unless exempted due to safety, operation, or maintenance requirements.

CARB In-Use On-Road Diesel Vehicle Regulation

CARB's On-Road Heavy-Duty Diesel Vehicles (In-Use) regulation (also known as the Truck and Bus Regulation) is intended to reduce emission of NO_x, PM, and other criteria pollutants generated from existing on-road diesel vehicles operating in California. The regulation applies to nearly all diesel-fueled trucks and buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds that are privately or federally owned, and for privately and publicly owned school buses. Heavier trucks and buses with a GVWR greater than 26,000 pounds must comply with a schedule by engine model year, or owners can report to show compliance with more flexible options. Fleets complying with the heavier trucks and buses schedule must install the best available PM filter on 1996 model year and newer engines and replace the vehicle 8 years later. Trucks with 1995 model year and older engines had to be replaced starting in 2015. Replacements with a 2010 model year or newer engine meet the final requirements, but owners can also replace the equipment with used trucks that have a future compliance date (as specified in regulation). By 2023, all trucks and buses must have at least 2010 model year engines with few exceptions.

Local Regulations

Bay Area Air Quality Management District

The BAAQMD is the agency primarily responsible for maintaining air quality and regulating emissions of criteria and toxic air pollutants within the SFBAAB. The BAAQMD carries out this responsibility by preparing, adopting, and implementing plans, regulations, and rules that are designed to achieve attainment of state and national air quality standards.

The BAAQMD is the agency primarily responsible for maintaining air quality and regulating emissions of criteria and toxic air pollutants within the SFBAAB. The BAAQMD carries out this responsibility by preparing, adopting, and implementing plans, regulations, and rules that are designed to achieve attainment of state and national air quality standards. The BAAQMD currently has 13 regulations containing more than 100 rules that control and limit emissions from sources of pollutants. Table 3-1 summarizes the major BAAQMD rules and regulations that may apply to the proposed project.

Table 3-1: Potentially Applicable BAAQMD Rules and Regulations

Regulation	Rule	Description
1- General Provisions and Definitions	1- General Provisions and Definitions	301 – Public Nuisance: Establishes that no person shall discharge quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number or person or the public; or which endangers the comfort, repose, health or safety of any such person or the public.
2- Permits	2- New Source Review	Provides for the review of new and modified sources of pollutants; requires use of Best Available Control Technology and emissions offsets to achieve no net increase in nonattainment pollutants; implements Prevention of Significant Deterioration review for attainment pollutants.
2 – Permits	5 – New Source Review of Toxic Air Contaminants	Provides for the review of new and modified sources of toxic air contaminants; requires use of Best Available Control Technology for sources that

Table 3-1: Potentially Applicable BAAQMD Rules and Regulations

Regulation	Rule	Description
		have a risk above certain thresholds and limits total project risks to 10.0 in a million cancer risk, 1.0 chronic hazard index, and 1.0 acute hazard index.
6 – Particulate Matter	1 – General Requirements	Limits visible particulate matter emissions.
6 – Particulate Matter	6 – Prohibition of Trackout	Limits the quantity of particulate matter through control of trackout of solid materials on paved public roads from construction sites that are greater than one acre in size.
8 – Organic Compounds	3 – Architectural Coatings	Sets forth VOC limitations and requirements for architectural coatings. Flat, non-flat, and non-flat – high glass coatings are required to meet standards of 50, 100, and 150 grams of VOC per liter (g/L), respectively. Traffic marking coatings are required to meet a standard of 100 g/L.
7- Odorous substances	Odorous Substances	Establishes general limitations on odorous substances and specific emission limitations on certain odorous compounds, such as ammonia.
11 – Hazardous Pollutants	2 – Asbestos Demolition, Renovation, and Manufacturing	Controls emissions of asbestos to the atmosphere during demolition.
Source: BAAQMD, 2023b.		

On April 29, 2017, the BAAQMD adopted its *Spare the Air-Cool the Climate 2017 Clean Air Plan* (Clean Air Plan). The 2017 Clean Air Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, in fulfillment of state ozone planning requirements. The Plan focuses on the three following goals:

- Attain all state and national air quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

The plan includes 85 distinct control measures to help the region reduce air pollutants and has a long-term strategic vision which forecasts what a clean air Bay Area will look like in the year 2050. The control measures aggressively target the largest source of GHG, ozone pollutants, and particulate matter emissions – transportation. The 2017 Clean Air Plan includes more incentives for electric vehicle infrastructure, off-road electrification projects such as Caltrain and shore power at ports, and reducing emissions from trucks, school buses, marine vessels, locomotives and off-road equipment (BAAQMD 2017b).

3.3.3 Discussion

Would the project:

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

No Impact. The proposed project would not conflict with nor obstruct implementation of the BAAQMD 2017 Clean Air Plan (BAAQMD 2017b). The 2017 Clean Air Plan includes increases in regional construction, area, mobile, and stationary source activities, and operations in its

emission inventories and plans for achieving attainment of air quality standards. Chapter 5 of the *Clean Air Plan* contains the BAAQMD's strategy for achieving the plan's climate and air quality goals. This control strategy is the backbone of the *2017 Clean Air Plan*.

The proposed project would consist of replacing the Service Center's aged Fleet Maintenance and Logistics Warehouse and Shops buildings with new buildings; renovating the interior of the existing Operations building; constructing new accessory structures; and constructing site improvements, including an improved stormwater management system, repaving the entire site, and installing new landscaping along Industrial Road and around the Operations building. These would not conflict with or obstruct implementation of the BAAQMD *2017 Clean Air Plan*. The *2017 Clean Air Plan* includes 85 control measures that are grouped into nine categories. Most of these control measures would not apply to the project, because they are implemented at the local and regional local by municipal governments and/or the BAAQMD. Table 3-2 summarizes the project's consistency with potentially applicable control strategies from the 2017 Clean Air Plan (2017b).

Table 3-2: BAAQMD 2017 Clean Air Plan Control Measures Consistency

Regulation	Description
Transportation Control Measures	
TR1: Clean Air Teleworking Initiative	Not applicable. The proposed project would not alter existing traffic associated with site activities (it would not change either trip generation or VMT).
TR2: Trip Reduction Programs	Not applicable. The proposed project would not alter existing traffic associated with site activities (it would not change either trip generation or VMT).
TR9: Bicycle and Pedestrian Access and Facilities	Consistent. The project would provide approximately 27 spaces for bicycle parking.
Building Control Measures	
BL1: Green Buildings	Consistent. The project would be designed to the City's REACH Code requirements and CalGreen Code standards. New buildings and major renovations to existing buildings would be required to be all-electric design per the City's REACH Code.
BL4: Urban Heat Island Mitigation	Consistent. The project would be subject to the 2022 Title 24 Building Code, which would require the proposed buildings to have roofs that meet the aged solar reflectance and thermal emittance requirements specified in CalGreen Code Section 140.3(a)(1)(A)(ii).
Waste Management Control Measures	
WA4: Recycling and Waste Reduction	Consistent. The project would divert construction waste, consistent with CalGreen Code requirements.

As shown in Table 3-2, the project would be consistent with applicable control measures contained in the *2017 Clean Air Plan*. This impact would be less than significant.

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

Less Than Significant Impact. The proposed project would generate both short-term construction emissions and long-term operational emissions. The project's potential emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1.1. As described in more detail below, the proposed project would not generate short-term or long-term emissions that exceed BAAQMD-recommended criteria air pollutant thresholds.

Construction Emissions

The proposed project involves various activities that would be phased over the next several years as described in Section 2.4.6 and summarized below.

- **Phase 1: Perimeter Security Construction (*completed in 2022 under separate permit*):** Install perimeter security fence, gates, walls, and CCTV cameras.
- **Phase 2: Site Improvements (Visitor Parking, Fleet Parking, and Employee Parking Construction):** Replace current employee parking and fleet parking surface lots. Build stormwater detention basins/infrastructure. Re-route/replace underground utilities for future buildout. No existing building structures would be affected.³
- **Phase 3: Material Storage Construction:** Build new non-occupied material storage canopy, material storage building, and pole storage racks. No existing building structures would be affected.
- **Phase 4: Logistics Warehouse Construction:** Build a new Logistics Warehouse & Shops Building. Relocate equipment and operations from existing Logistics building into new Logistics building. Add a new emergency generator to the site. No existing building structures would be affected.
- **Phase 5: Fleet Building and Parking Construction:** Build new Fleet Maintenance building. Relocate equipment and operations from existing Fleet building into new Fleet building. Demolish the existing Fleet Building and replace the area with parking.

Construction activities associated with the proposed Master Plan would generally include demolition and pavement removal; site preparation; grading; building construction (foundation and vertical construction work); paving; and architectural coating. Construction emissions would be generated on-site during the use of heavy-duty, off-road construction equipment (e.g., excavators, graders, forklifts, etc.) and off-site during worker, vendor (construction material delivery), and soil hauling trips.

The project's potential construction emissions were estimated using default CalEEMod assumptions, with the following project-specific modifications:

- **Construction Phases and Schedule:** CalEEMod default assumptions for construction phases (e.g., site preparation, grading, etc.) and scheduling were adjusted to reflect project-specific information, by Master Plan phase, provided by the Applicant. Construction emissions were modeled via three separate CalEEMod runs for Phase 2 (with SLR improvements), Phases 3 and 4, and Phase 5. Construction activities associated with Phase 2 and Phases 3 and 4 were modeled as beginning in 2024 with

³ The project would include improvements to prepare the site for sea level rise (SLR) including elevating the new buildings and materials storage area outside the projected flood height through the import of fill. Fill import has been incorporated into Phase 2 for the purposes of the air quality emissions modeling as a conservative measure, since the greatest potential for phase overlap or emissions to occur in the same year would be at the beginning of improvements proposed by the Master Plan (e.g., Phase 2, 3, and 4 could occur back to back and potentially even overlap).

Phase 5 beginning in 2025.⁴ In reality, construction activities associated with the various Master Plan phases would likely be staggered at greater intervals and have less potential to overlap, thereby reducing average daily emissions associated with the project (i.e., because the same amount of emissions would be spread out across more days). Therefore, the analysis contained in this Initial Study is considered conservative as it provides a worse-case evaluation of potential air quality construction impacts by modeling construction emissions as occurring simultaneously toward the beginning of the Master Plan's implementation (when older, higher-polluting equipment would be in use throughout the SFBAAB).

- **Construction Equipment:** CalEEMod default assumptions for construction equipment were modified to reflect project-specific equipment requirements provided by the Applicant.
- **Building Demolition:** The modeling assumed approximately 25,224 tons total of debris would be demolished and hauled off site. Debris off haul was based on approximately 5,489 cubic yards of asphalt, concrete, and landscape off haul for Phase 2, approximately 5,945 cubic yards of asphalt and concrete off haul for Phase 3 and 4, and approximately 1,363 cubic yards of asphalt and concrete off haul for Phase 5.⁵
- **Soil Hauling:** Based on information from the Applicant, the project would include import of approximately 34,470 cubic yards of soil and export of 3,766 cubic yards of soil from the site.
 - Phase 2 would involve approximately 4,405 cubic yards of soil import for bio retention and landscape activities and up to approximately 29,280 cubic yards of soil import for elevating project building pads.
 - Phase 3 would involve approximately 25 cubic yards of soil import and 147 cubic yards of soil export.
 - Phase 4 would involve approximately six (6) cubic yards of soil import and 3,499 cubic yards of soil export.
 - Phase 5 would involve approximately 754 cubic yards of soil import and 120 cubic yards of soil export.
- **Fugitive Dust Control Measures:** Fugitive dust control measures were incorporated in the construction emissions modeling, consistent with the City's standard conditions of approval (COAs) and BAAQMD guidelines. Specifically, the model assumes the site would be watered twice a day, reducing fugitive dust emissions by 61%.
- **Vehicle Trips:** Additional worker and vendor trips were incorporated into the model for building construction, paving, and trenching phases to account for material deliveries to the site.

The project's estimated construction criteria air pollutant emissions are presented in Table 3-3. Refer to Appendix B for detailed CalEEMod assumptions and output files.

⁴ These dates reflect the timeframes that were used for emissions modeling. Project construction would occur later than these dates as a result of required approvals and permits. The emissions estimates presented in this section are therefore conservative, because they reflect the use of an older fleet mix. Project construction activities occurring in the future would benefit from the use of new, cleaner, more efficient pieces of equipment, which would reduce overall emissions associated with project construction.

⁵ Debris materials densities based on information contained in LEED Reference Guide for Green Building Design and Construction calculations (US Green Building Council, 2009, Section 6-Table 2).

Table 3-3: Estimated Project Construction Criteria Air Pollutant Emissions

Year / Scenario ^(A)	Pollutant Emissions (Average Pounds per Day)						
	ROG	NOx	CO	PM ₁₀		PM _{2.5}	
				Dust ^(B)	Exhaust	Dust ^(B)	Exhaust
Year 2024							
Phase 2	1.6	15.8	15.3	1.3	0.6	0.3	0.6
Phases 3 and 4	2.2	10.4	12.4	0.6	0.4	0.2	0.4
Year 2024 Total	3.8	26.2	27.7	1.9	1.0	0.5	1.0
Year 2025							
Phase 2	0.3	0.3	0.4	<0.1	<0.1	<0.1	<0.1
Phase 3 and 4	1.0	0.1	0.1	<0.1	<0.1	<0.1	<0.1
Phase 5	1.1	3.8	4.9	0.3	0.1	0.1	0.1
Year 2025 Total	2.4	4.2	5.4	0.3	0.1	0.1	0.1
BAAQMD CEQA Threshold	54	54	--	BMPs	82	BMPs	82
Potentially Significant Impact?	No	No	No	No ^(B)	No	No ^(B)	No
BAAQMD 2023a and MIG 2024. See Appendix B.							
(A) Emissions estimates are based on cumulative time of construction (i.e., one year – 365 days – that may be split across multiple calendar years). The CalEEMod analysis years reflect an older equipment fleet that would generate more emissions than new equipment and therefore these emissions estimates are considered conservative.							
(B) For all projects, the BAAQMD recommends implementing eight basic construction best management practices (BMPs) to control fugitive dust from construction activities. As described in this section, the proposed project would be required to implement the BAAQMD's fugitive dust BMPs as a COA, rendering this impact less than significant.							

As shown in Table 3-3, construction emissions associated with the proposed project would be below all BAAQMD significance thresholds for criteria air pollutant emissions; however, as indicated in the BAAQMD's *CEQA Guidelines*, fugitive dust emissions are considered potentially significant, regardless of the quantity of PM₁₀ or PM_{2.5} emitted, unless the BAAQMD's nine, recommended fugitive dust BMPs are implemented during construction activities (BAAQMD 2023b, Table 5-2).

As a COA for the proposed project, the City would require the implementation of the BAAQMD's recommended fugitive dust BMPs during construction activities (see Table 2-3).

COA: The project shall implement BAAQMD's Construction Fugitive Dust Best Management Practices and shall provide notes on the plans submitted to the Building Division for permits. The project shall implement BAAQMD's Construction Fugitive Dust Best Management Practices and shall provide notes on the plans submitted to the Building Division for permits.

Operational Emissions

Upon completion of construction activities, the Service Center would continue to generate emissions of regulated air pollutants from routine operations:

- **“Area” Sources.** The project site would continue to generate emissions from small area sources, including landscaping equipment, and the use of consumer products (e.g.,

paints, cleaners, and fertilizers) that result in the evaporation of chemicals into the atmosphere during product use.

- **Mobile Sources.** The project site would continue to generate emissions from vehicle traveling to and from the project site.
- **Stationary Sources.** The project site would continue to generate emissions from operation of emergency backup generators on-site.

The proposed project primarily involves constructing new structures and materials storage facilities, new utilities, pavement, and landscaping. The proposed project would not change operations at the site, including mobile source emissions. No new activities would be added to the site. Existing activities would not increase, and no new/additional employees would be needed at the site as a result of the proposed project. Any additional emissions from sources such as landscaping equipment would be nominal. Furthermore, the proposed project could actually serve to result in a net reduction in some operational source emissions, because 1) the project would involve remodeling existing, older, less energy-efficient buildings at the site, and eliminate natural gas from sources such as space and water heating (thereby reducing NO_x emissions associated with natural gas combustion) and 2) could help reduce mobile source emissions by providing EV charging infrastructure for passenger vehicles, thereby making EV charging more convenient.

Since operational-related emissions associated with the proposed project are anticipated to be approximately the same at the site under proposed conditions as existing conditions, there would be little to no physical change to the environment under proposed conditions with respect to air quality. The generator installed as part of the project would only run for regular testing/maintenance and in the event of emergencies; it would not run as part of standard facility operation. The project would not have the potential to exceed the BAAQMD's operational criteria air pollutant thresholds of significance. This impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As described in Section 2.2.3, sensitive residential receptors are generally located to the south and southwest of the project site (a medical facility and residences, respectively). Project-related construction activities would emit PM_{2.5} from equipment exhaust. Nearly all the project's PM_{2.5} emissions from equipment exhaust would be diesel particulate matter (DPM), a TAC. However, these emissions from equipment/vehicle operation would emit DPM, the resulting emissions would not result in substantial pollutant concentrations at receptor locations for several reasons.

First, the project is not located adjacent to any locations where sensitive receptors spend significant time. The majority of construction activities at the project site would take place 745 feet or more from the closest residential receptors, giving pollutants ample time and space to disperse, thereby decreasing exhaust concentrations. Second, the prevailing wind in the vicinity of the project area is from the west/northwest. Given that the project site is located north of the nearest long-term sensitive receptors (i.e., residential receptors along Fairfield Drive and Northwood Drive) pollutants emitted during construction of the project would disperse to the east/southeast of these receptors, toward the freeway and commercial and industrial land uses that are not sensitive. Third, health risks associated with receptor exposure to DPM emissions typically take years of consistent exposure in order to accumulate in a considerable manner. Receptors at the Sutter Medical/PAMF facility would only be there for temporary periods of time while receiving specific medical care; they would not be exposed to emissions for years at a time. Finally, back-up generators at the site would be required to be permitted by the BAAQMD. Potential health risks associated with receptor exposure to exhaust from generator operation would be assessed during the permitting process; the BAAQMD would not issue a permit unless it can be demonstrated that the facility's stationary sources would not result in a significant

health risk to nearby sensitive receptors. Further, as noted previously, the prevailing wind would direct construction emissions both away from the Sutter Medical/PAMF facility and residential receptors. Therefore, construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.

From an operational standpoint, the proposed project would yield similar emissions compared to those of the existing PG&E Service Center, as the activities at the site would be unchanged, and the project would not add new uses to the site or expand existing uses. The proposed project would not involve changes to vehicle trips to/from the site, nor would it substantially change the operational characteristics of off-road equipment at the site. Therefore, operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

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

Less Than Significant Impact. Construction of the project would generate typical odors associated with construction activities, such as vehicle exhaust odors. The odors generated by the project would be intermittent and localized in nature and would disperse quickly. There are no other anticipated odor emissions associated with project operation. Therefore, the project would not create emissions or odors that adversely affect a substantial number of people. This impact would be less than significant.

3.3.4 References

- Bay Area Air Quality Management District (BAAQMD). 2017a. "Air Quality Standards and Attainment Status". BAAQMD, Research & Data, Air Quality Standards & Attainment Status. January 5, 2017. Available online at <http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status>.
- _____. 2017b. 2017 Clean Air Plan: Spare the Air, Cool the Climate. BAAQMD, Planning, Rules, and Research Division. April 19, 2017.
- _____. 2023a. California Environmental Quality Act Air Quality Guidelines. San Francisco, CA. April 2020, updated April 2023.
- _____. 2023b. Current Rules. Last updated June 12, 2023. Web: <https://www.baaqmd.gov/rules-and-compliance/current-rules>
- US Green Building Council. 2009. LEED Reference Guide for Green Building Design and Construction. 2009 Edition.

3.4 BIOLOGICAL RESOURCES

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

3.4.1 Environmental Setting

The project site is located within the San Mateo, California 7.5-minute USGS quadrangle. The project site is located at 275 Industrial Road in the northeast portion of the City of San Carlos, California. Highway 101 borders the site to the southeast, a Sutter Health medical facility and its associated parking garage are located south of the project site, and various automotive sales/repair shops and commercial buildings along Industrial Road neighbor the project site to the west. It is in the watershed of Steinberger Slough, downstream of both the Belmont Creek and Pulgas Creek watersheds (Tillery, 2007). MIG biologists Taylor Peterson and Alex Broskoff conducted a field visit of the project site and surrounding vicinity on September 14, 2023.

The project site is an 18.4-acre developed parcel that is entirely paved and is surrounded on three sides with walls and the fourth side with a fence. Three single-story buildings and several storage containers are located on the parcel. The project site is bordered on the north, south, and west by engineered, natural bottom storm drainage channels that collect stormwater from

San Carlos, and empty into Phelps Slough. The storm drain channels are further described below.

The arborist report prepared for the project indicates that there are 66 on-site trees, and 32 trees are located within or near the project's proposed areas of impact. Twelve trees would be removed by the proposed project. Six of the trees will be removed due to construction activities and the other six will be removed due to the poor health of the trees (Barlett Tree Experts 2021).

All project activities will occur in developed portions of the parcel and no work is proposed to occur within the storm drainage channels.

Existing Land Cover Types, Vegetation Communities, and Habitats

Mixed Riparian Woodland

A narrow corridor supporting mixed riparian woodland is present along the engineered drainage on the southeastern portion of the project site, adjacent to Highway 101. This habitat consists of ornamental and native tree species that have been planted along the property line as a vegetation break from the adjacent property and Highway 101. These species include blackwood acacia (*Acacia melanoxylon*), Monterey pine (*Pinus radiata*), and coast live oak (*Quercus agrifolia*). The understory of this habitat is sparse and supports a mix of non-native herbaceous species including sweet fennel (*Foeniculum vulgare*), cheeseweed (*Malva parviflora*), Bristly ox tongue (*Picris echioides*), French broom (*Genista monspessulana*), sedge (*Cyperus spp.*), prickly lettuce (*Lactuca serriola*) and non-native grasses.

Wildlife observed in the mixed woodland habitat during the August 2023 site visit includes black phoebe (*Sayornis nigricans*), and American crow (*Corvus brachyrhynchos*). Other species that are common in stream and mixed woodland habitats in urban areas may also be present, but that were not observed, include; western fence lizard (*Sceloporus occidentalis*), Northern alligator lizard (*Elgaria coerulea*), gopher snake (*Pituophis catenifer*), Anna's hummingbird (*Calypte anna*), western scrub jay (*Aphelocoma californica*), California towhee (*Pipilo crissalis*), dark-eyed junco (*Junco hyemalis*), house finch (*Carpodacus purpureus*), Eastern fox squirrel (*Sciurus niger*), northern raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), and striped skunk (*Mephitis mephitis*). One special status mammal species, the San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), also commonly occurs in this habitat type, but none of its characteristic perennial middens were observed to be present.

Storm Drainage Channels

Engineered, earthen storm drainage channels are located along the north, south, and eastern borders of the project site. These channels are fed by culverts under Industrial Road to the west and convey stormwater runoff from a relatively small watershed to Phelps Slough, approximately 0.6 mile southeast of the project site, on the San Francisco Bay side of Hwy 101. Phelps Slough enters a lagoon before being released to Steinberger Slough through a tidegate. The channels appear to be isolated from nearby Belmont and Pulgas creeks (Tillery 2007). The channels are mostly natural earthen bed and bank and generally flow west to northeast. During the September 2023 site visit the channels were observed to have flowing water (approximately 8 – 12 inches of water), and contain cattails, tule, various native/non-native shrubs, and ornamental plantings. The banks are lined with planted native and non-native trees. The land cover types (mixed riparian woodland, storm drain channel and developed) are described above.

Wetland

The engineered channels are a perennial water source that surround the project site and has developed into a freshwater wetland. This wetland can support many species including amphibians and reptiles and is currently supporting wetland indicator plant species. These

species include cattails (*Typha* sp.), tule (*Scirpus* sp.), curly dock (*Rumex crispus*), sedge (*Cyperus* spp.),

Developed

The parcel contains an existing paved lot with three single-story buildings that include a 53,700-square foot Operations Building, a 9,534-square-foot Logistics Warehouse & Shops Building, and a 7,979-square foot Fleet Building. The existing site is occupied by and operated as a service center to support the public's needs for electric and natural gas infrastructure maintenance and development. The arborist report indicates there are 32 trees within the project area including ornamental and native species (Appendix A). Only limited, sparse ornamental plantings are present within this developed portion of the project area. Developed habitats have limited value to most wildlife species, but a few urban-adapted species such as mourning dove (*Zenaidura macroura*), and house finch (*Haemorhous mexicanus*), may nest in vegetation within the developed portion of the project site and on human-made features, such as light fixtures, within the project site. However, no wildlife was observed in the developed portion of the site during the site visit.

Special-Status Species and Sensitive Habitats

The drainage channels adjacent to the project site potentially provides habitat for special-status species including California red-legged frog (*Rana draytonii*) and Central California Coast steelhead (*Onchorhynchus mykiss*), but these species are not expected to occur there for the reasons discussed later in this chapter. In addition, mixed riparian woodland and wetland habitats are supported and present in the channel. but no California Department of Fish and Wildlife (CDFW) designated special-status species or other sensitive habitats are present in the channel. Special-status species and sensitive habitats are discussed in greater detail below.

3.4.2 Regulatory Setting

Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, provides the regulatory framework for the protection of plant and animal species (and their associated critical habitats), which are formally listed, proposed for listing, or candidates for listing as endangered or threatened under FESA. FESA has the following four primary components: (1) provisions for listing species, (2) requirements for consultation with the United States Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NOAA Fisheries), (3) prohibitions against "taking" (i.e., harassing, harming, hunting, shooting, wounding, killing, trapping, capturing, or collecting, or attempting to engage in any such conduct) of listed species, and (4) provisions for permits that allow incidental "take". FESA also discusses recovery plans and the designation of critical habitat for listed species.

Both the USFWS and NOAA Fisheries share the responsibility for the administration of FESA. Section 7 requires federal agencies, in consultation with, and with the assistance of the USFWS or NOAA Fisheries, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. Non-federal agencies and private entities can seek authorization for take of federally listed species under Section 10 of FESA, which requires the preparation of a Habitat Conservation Plan (HCP).

U.S. Migratory Bird Treaty Act

The U.S. Migratory Bird Treaty Act (MBTA; 16 USC §§ 703 et seq., Title 50 Code of Federal Regulations [CFR] Part 10) states it is "unlawful at any time, by any means or in any manner, to

pursue, hunt, take, capture, kill; attempt to take, capture or kill; possess, offer for sale, sell, offer to barter, barter, offer to purchase, purchase, deliver for shipment, ship, export, import, cause to be shipped, exported, or imported, deliver for transportation, transport or cause to be transported, carry or cause to be carried, or receive for shipment, transportation, carriage, or export any migratory bird, any part, nest, or egg of any such bird, or any product, whether or not manufactured, which consists, or is composed in whole or in part, of any such bird or any part, nest or egg thereof..." In short, under MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird, destroying a nest, or destroying an egg. The USFWS enforces MBTA. The MBTA does not protect some birds that are non-native or human-introduced or that belong to families that are not covered by any of the conventions implemented by MBTA.

Clean Water Act

The Clean Water Act (CWA) is the primary federal law regulating water quality. The implementation of the CWA is the responsibility of the U.S. Environmental Protection Agency (EPA). However, the EPA depends on other agencies, such as the individual states and the U.S. Army Corps of Engineers (USACE), to assist in implementing the CWA. The objective of the CWA is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 and 401 of the CWA apply to activities that would impact waters of the U.S. The USACE enforces Section 404 of the CWA, and the California State Water Resources Control Board enforces Section 401.

Section 404

As part of its mandate under Section 404 of the CWA, the EPA regulates the discharge of dredged or fill material into "waters of the United States" (U.S.). "Waters of the U.S." include territorial seas, tidal waters, and non-tidal waters in addition to wetlands and drainages that support wetland vegetation, exhibit ponding or scouring, show obvious signs of channeling, or have discernible banks and high-water marks. Wetlands are defined as those areas "that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3(b)). The discharge of dredged or fill material into waters of the U.S. is prohibited under the CWA except when it is in compliance with Section 404 of the CWA. Enforcement authority for Section 404 was given to the USACE, which it accomplishes under its regulatory branch. The EPA has veto authority over the USACE's administration of the Section 404 program and may override a USACE decision with respect to permitting.

Substantial impacts to waters of the U.S. may require an Individual Permit. Projects that only minimally affect waters of the U.S. may meet the conditions of one of the existing Nationwide Permits, provided that such permits' other respective conditions are satisfied. A Water Quality Certification or waiver pursuant to Section 401 of the CWA is required for Section 404 permit actions (see below).

Section 401

Any applicant for a federal permit to impact waters of the U.S. under Section 404 of the CWA, including Nationwide Permits where pre-construction notification is required, must also provide to the USACE a certification or waiver from the State of California. The "401 Certification" is provided by the State Water Resources Control Board through the local Regional Water Quality Control Board (RWQCB).

The RWQCB issues and enforces permits for discharge of treated water, landfills, stormwater runoff, filling of any surface waters or wetlands, dredging, agricultural activities and wastewater recycling. The RWQCB recommends the "401 Certification" application be made at the same

time that any applications are provided to other agencies, such as the USACE, USFWS, or NOAA Fisheries. The certification is not issued until completion of environmental review under CEQA. The application to the RWQCB is similar to the pre-construction notification that is required by the USACE. It must include a description of the habitat that is being impacted, a description of how the impact is proposed to be minimized and proposed mitigation measures with goals, schedules, and performance standards. Mitigation must include a replacement of functions and values, and replacement of wetland. The RWQCB looks for mitigation that is on site and in-kind, with functions and values as good as or better than the water-based habitat that is being removed.

State Regulations

California Environmental Quality Act

CEQA (Public Resources Code Sections 21000 et. seq.) requires public agencies to review activities which may affect the quality of the environment so that consideration is given to preventing damage to the environment. When a lead agency issues a permit for development that could affect the environment, it must disclose the potential environmental effects of the project. This is done with an “Initial Study and Negative Declaration” (or Mitigated Negative Declaration) or with an “Environmental Impact Report”. Certain classes of projects are exempt from detailed analysis under CEQA if they meet specific criteria and are eligible for a Categorical Exemption.

CEQA Guidelines Section 15380 defines endangered, threatened, and rare species for purposes of CEQA and clarifies that CEQA review extends to other species that are not formally listed under the state or federal Endangered Species acts but that meet specified criteria. The state maintains a list of sensitive, or “special-status”, biological resources, including those listed by the state or federal government or the California Native Plant Society (CNPS) as endangered, threatened, rare or of special concern due to declining populations. During CEQA analysis for a proposed project, the California Natural Diversity Data Base (CNDDB) is usually consulted among other databases. CNDDB relies on information provided by the CDFW, USFWS, and CNPS, among others. Under CEQA, the lists kept by these, and any other widely recognized organizations are considered when determining the impact of a project. The CEQA Appendix G checklist includes several questions regarding impacts to biological resources. Responses to these questions are provided in the Discussion section below.

California Endangered Species Act

The California Endangered Species Act (CESA; Fish and Game Code 2050 et seq.), administered by CDFW, generally parallels FESA. It establishes the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. Section 2080 of the California Fish and Game Code prohibits the take, possession, purchase, sale, and import or export of endangered, threatened, or candidate species, unless otherwise authorized by permit or by the regulations. “Take” is defined in Section 86 of the California Fish and Game Code as to “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” This definition differs from the definition of “take” under FESA. CESA allows for take incidental to otherwise lawful projects but mandates that State lead agencies consult with the CDFW to ensure that a project would not jeopardize the continued existence of threatened or endangered species.

California Fish and Game Code Sections 1600-1607

Sections 1600-1607 of the California Fish and Game Code require that a Notification of Lake or Streambed Alteration application be submitted to CDFW for “any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake.” CDFW reviews the proposed actions in the application and, if necessary,

prepares a Lake or Streambed Alteration Agreement (LSAA or SAA), that includes measures to protect affected fish and wildlife resources.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) was created in 1977 with the intent to preserve, protect, and enhance rare and endangered plants in California (California Fish and Game Code sections 1900 to 1913). The NPPA is administered by CDFW, which has the authority to designate native plants as endangered or rare and to protect them from “take.” CDFW maintains a list of plant species that have been officially classified as endangered, threatened, or rare. These special-status plants have special protection under California law and projects that directly impact them may not qualify for a categorical exemption under CEQA guidelines.

Fully Protected Species and Species of Special Concern

The classification of California fully protected (CFP) species was the CDFW’s initial effort to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, amphibians and reptiles, birds, and mammals. Most of the species on these lists have subsequently been listed under CESA and/or FESA. The Fish and Game Code sections (§5515 for fish, §5050 for amphibian and reptiles, §3511 for birds, §4700 for mammals) deal with CFP species and state that these species “...may not be taken or possessed at any time and no provision of this code or any other law shall be construed to authorize the issuance of permits or licenses to take any fully protected species” (CDFW Fish and Game Commission 1998). This language makes the CFP designation the strongest and most restrictive regarding the “take” of these species. In 2003, the code sections dealing with CFP species were amended to allow the CDFW to authorize take resulting from recovery activities for state-listed species. Additionally, on July 10, 2023, Senate Bill 147 (SB 147) was signed into law, which allows for take of a “fully protected” species for certain renewable energy and infrastructure projects, but CDFW incidental take permits and mitigation for take would still be required.

California species of special concern (CSSC) are broadly defined as animals not listed under FESA or CESA, but which are nonetheless of concern to CDFW because they are declining at a rate that could result in listing, or historically occurred in low numbers and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals by CDFW, land managers, consulting biologists, and others, and is intended to focus attention on the species to help avert the need for costly listing under FESA and CESA, and cumbersome recovery efforts that might ultimately be required. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them. Although these species generally have no special legal status, they are given special consideration under CEQA during project review.

California Migratory Bird Protection Act

Fish & Game Code section 3513 states that federal authorization of take or possession is no longer lawful under the state Fish & Game Code if the federal rules or regulations are inconsistent with state law. The California Migratory Bird Protection Act (MBPA) was passed in September 2019 to provide a level of protection to migratory birds in California consistent with the U.S. MBTA before it was altered by Executive Order in 2017. The law is set to become inoperative in January 2025, and be repealed in January 2026.

Nesting Birds

Nesting birds, including raptors, are protected under California Fish and Game Code Section 3503, which reads, “It is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” In

addition, under California Fish and Game Code Section 3503.5, “it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto”. Passerines and non-passerine land birds are further protected under California Fish and Game Code 3513. As such, CDFW typically recommends surveys for nesting birds that could potentially be directly (e.g., actual removal of trees/vegetation) or indirectly (e.g., noise disturbance) impacted by project-related activities. Disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by CDFW.

Non-Game Mammals

Sections 4150-4155 of the California Fish and Game Code protects non-game mammals, including bats. Section 4150 states “A mammal occurring naturally in California that is not a game mammal, fully protected mammal, or fur-bearing mammal is a nongame mammal. A non-game mammal may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission”. The non-game mammals that may be taken or possessed are primarily those that cause crop or property damage. Bats are classified as a non-game mammal and are protected under the California Fish and Game Code, in addition to being protected if they are a listed species (e.g., CSSC, CFP, state or federal threatened, or state or federal endangered).

Sensitive Vegetation Communities

Sensitive vegetation communities are natural communities and habitats that are either unique in constituent components, of relatively limited distribution in the region, or are of particularly high wildlife value. These communities may or may not necessarily contain special-status species. Sensitive natural communities are usually identified in local or regional plans, policies, or regulations, or by the CDFW (i.e., CNDDDB) or the USFWS. The CNDDDB identifies a number of natural communities as rare, which are given the highest inventory priority (Holland 1986; CDFW 2022). Impacts to sensitive natural communities and habitats must be considered and evaluated under CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

Porter-Cologne Water Quality Control Act

The intent of the Porter-Cologne Water Quality Control Act (Porter-Cologne) is to protect water quality and the beneficial uses of water, and it applies to both surface and ground water. Under this law, the State Water Resources Control Board develops statewide water quality plans, and the RWQCBs develop basin plans, which identify beneficial uses, water quality objectives, and implementation plans. The RWQCBs have the primary responsibility to implement the provisions of both statewide and basin plans. Waters regulated under Porter-Cologne, referred to as “waters of the State,” include isolated waters that are not regulated by the USACE. Projects that require a USACE permit, or fall under other federal jurisdiction, and have the potential to impact waters of the State are required to comply with the terms of the Water Quality Certification Program. If a proposed project does not require a federal license or permit, any person discharging, or proposing to discharge, waste (e.g., soil) to waters of the State must file a Notice of Intent (NOI) or a Report of Waste Discharge and receive either waste discharge requirements (WDRs) or a waiver to WDRs before beginning the discharge.

Local Regulations

City of San Carlos Municipal Code – Interim Protected Tree Ordinance

The San Carlos Municipal Code (City of San Carlos 2022) sets forth regulations for “protected trees” (Sections 18.18.070 and 18.41.020) which are defined as “heritage” or “significant” trees. All “Protected Trees” in the City of San Carlos require a permit before pruning 25% or more of

the tree and or removal of the tree. A “Protected Tree” means any significant or heritage tree, any tree as part of a replacement requirement, an approved development permit or an approved landscaping plan. The following trees shall not be classified as protected trees regardless of size:

- a. Bailey, Green or Black Acacia: *A. baileyana*, *A. decurrens* or *A. melanoxylon*;
- b. Tree of Heaven: *Ailanthus altissima*;
- c. Fruit trees of any kind;
- d. Monterey Pine: *Pinus radiata*;
- e. Eucalyptus genera;
- f. Monocot trees including palms and palm relatives

A “Heritage Tree” means any:

- a. Indigenous tree whose size, as measured at fifty-four inches (54") above natural grade (unless otherwise indicated), is defined below:
 - i. *Aesculus californica* (buckeye) with a single stem or multiple stems touching each other at fifty-four inches (54") above natural grade and measuring nine inches (9") in diameter or greater.
 - ii. *Arbutus menziesii* (madrone) with a single stem or multiple stems touching each other at fifty-four inches (54") above natural grade and measuring nine inches (9") in diameter or greater.
 - iii. *Quercus agrifolia* (coast live oak) measuring nine inches (9") in diameter or greater.
 - iv. *Quercus lobata* (valley oak) measuring nine inches (9") in diameter or greater.
 - v. *Quercus douglassii* (blue oak) measuring nine inches (9") in diameter or greater.
 - vi. *Quercus wislizenii* (interior live oak) measuring nine inches (9") in diameter or greater.
 - vii. *Sequoia sempervirens* (redwood) measuring fifteen inches (15") in diameter or greater.
 - viii. *Umbellularia californica* (California bay laurel) with a single stem or multiple stems touching each other at fifty-four inches (54") above natural grade and measuring eleven inches (11") in diameter or greater.
- b. Community of trees;
- c. Trees designated by the City Council, based upon findings that the particular tree is unique and of importance to the public due to its unusual age, appearance, location or other factors.

A “Significant tree” means any tree that is eleven inches (11") in diameter (or more), outside of bark, measured at fifty-four inches (54") above natural grade, except for the list of trees presented above that are not considered “protected trees”.

The following requirements apply to protected trees, as defined in Municipal Code Sections 18.18.070 and [18.41.020](#):

1. No protected tree shall be removed, pruned, or otherwise materially altered without a permit except as provided in this section. Trimming of a protected tree is allowed without such a permit.

2. Chemicals or other construction materials shall not be stored within the tree protection zone of protected trees.
3. Drains shall be provided as required by the City Arborist whenever soil fill is placed around protected trees. Soil fill shall not be placed around protected trees without approval by an ISA-certified arborist.
4. Signs, wires or similar devices shall not be attached to protected trees.
5. Any construction activity performed within an area ten (10) times the diameter of a protected tree on any property or in the public right-of-way shall require submittal and implementation of a tree protection plan for review and approval by the City Arborist prior to issuance of any grading or construction permit. The tree protection plan shall be prepared by an ISA-certified arborist and shall address issues related to protective fencing and protective techniques as specified in the administrative guidelines to minimize impacts associated with grading, excavation, demolition and construction. The City Arborist may impose conditions on any City permit to assure compliance with this section. These trees and protection zones shall be identified on plans.
6. If the proposed development, including any site work for the development, will encroach upon the tree protection zone of a protected tree, special measures shall be utilized, as approved by the City Arborist, to allow the roots to obtain oxygen, water, and nutrients as needed. Any excavation, cutting, filling, or compaction of the existing ground surface within the protected perimeter, if authorized at all by the review authority, shall be minimized and subject to such conditions as may be imposed by the review authority. No significant change in existing ground level shall be made within the tree protection zone of a protected tree except as approved by the City Arborist. No burning or use of equipment with an open flame shall occur near or within the protected perimeter.
7. Underground trenching for utilities shall avoid major support and absorbing tree roots of protected trees. If avoidance is impractical, tunnels shall be made below the roots. Trenches shall be consolidated to service as many units as possible. Trenching within the tree protection zone of protected trees shall be avoided to the greatest extent possible and shall only be done under the at-site directions of a certified arborist and with approval by the City Arborist.
8. No concrete or asphalt paving shall be placed over the tree protection zone of oaks except as approved by the City Arborist.
9. No compaction of the soil within the tree protection zone of protected trees shall occur.

Removal and/or Pruning of Protected Trees Prohibited. It is unlawful for any person to remove, or cause to be removed, any protected tree from any parcel of property in the city, or perform pruning on a protected tree, without obtaining a permit; provided, that in case of emergency, when a protected tree is imminently hazardous or dangerous to life or property, it may be removed by order of the City Arborist. Section 18.18.070 specifies protected tree removal permit and decision-making criteria.

3.4.3 Discussion

Would the project:

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

Less than Significant Impact with Mitigation Incorporated. The project's potential impacts on special-status species and nesting birds are discussed below.

Special-status Species

For the purposes of this CEQA document, special-status species include those plant and animals listed, proposed for listing, or candidates for listing as threatened or endangered by USFWS or NOAA under the FESA; those listed or proposed for listing as rare, threatened or endangered by CDFW under the CESA; animals designated as Fully Protected or Species of Special Concern by the CDFW; and plants listed as Rank 1A, 1B, 2, 3 and 4 of the California Native Plant Society Inventory of Rare and Endangered Plants (CNPS Inventory).

Special-Status Plants. A list of 97 special-status plants with some potential for occurrence in the project vicinity was compiled using CNPS Inventory of Rare and Endangered Plants (CNPS 2024) and CNDDB records (CNDDB 2024) and reviewed for their potential to occur on the project site. Based on an analysis of the documented habitat requirements and occurrence records associated with these species, all 97 species were determined to be absent from the project site. These species were considered absent from the project site due to its mostly developed or disturbed habitat conditions. Thus, the project will have no impact on special-status plants. This list of potential plants is included in Appendix C.

Special-Status Animals. Those special-status animal species that were considered for their potential to occur on the project site include the federally listed threatened Central California Coast steelhead (*Onchorhynchus mykiss*) and California red-legged frog (*Rana draytonii*), a federally listed threatened and a California species of special concern (see Appendix C).

California red-legged frog (Rana draytonii). Although there is potentially suitable aquatic habitat for the California red-legged frog, the drainage channels bordering three sides of the site and the surrounding area are unsuitable for this species due to the lack of available upland estivation habitat and the urban nature of the project area. The only recorded occurrence of California red-legged frog is approximately 4 miles to the west (CNDDB 2024). The site is isolated from this known population by the surrounding development and otherwise unsuitable habitat which does not provide habitat connectivity to the project site. Therefore, California red-legged frog is highly unlikely to occur within the project site.

Central California Coast steelhead (Onchorhynchus mykiss). Although there is aquatic habitat present in the drainage channels bordering three sides of the site, they lack suitable spawning habitat (e.g., water flow and gravel substrate) and contain numerous barriers to movement including several tidal gates and underground culverts (including under Hwy 101) between the San Francisco Bay and the project site. Furthermore, steelhead are not known from this drainage channel (Leidy 2015). Therefore, Central California Coast steelhead is not expected to occur within the project site.

There is no USFWS-designated critical habitat on or near the project site (USFWS, 2023). Thus, the project will have no impact on critical habitat.

Nesting Birds

Nesting birds, including raptors, protected under the MBTA and California Fish and Game Code, are potentially present in the trees and shrubs in the project area and on the project site. Birds that potentially nest in the developed and landscaped areas adjacent to the project site are expected to be acclimated to high levels of disturbance and it is likely that construction activities will not disturb these birds. However, birds nesting within the project site may be more prone to disturbance. The project would remove 12 of the existing on-site trees. If construction activities occur during the avian breeding season (February 1 to September 15), injury to individuals or nest abandonment could occur. Tree removal could remove an active nest and noise and increased construction activity could temporarily disturb nesting or foraging activities, potentially

resulting in the abandonment of nest sites. Impacts from the project would be less than significant with the implementation of mitigation measure BIO-1.

Impact BIO-1: The proposed project could impact nesting birds if project activities are initiated during the nesting season.

Measure BIO-1: Avoid Impacts to Nesting Birds. To avoid impacts to nesting birds and avoid potential violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (that is, from September 16 to January 31). If construction and construction noise occurs within the avian breeding season (February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented.

If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist, until the chicks have fledged. If the qualified biologist determines that construction-free buffer zones can be reduced without disturbing the nest, a biological monitor shall be present during project activities to ensure compliance with Migratory Bird Treaty Act (MBTA) and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.

Effectiveness: This measure will reduce impacts to nesting birds to less than significant.

Implementation: This measure will be implemented by the Applicant or its contractor.

Timing: Prior to project construction.

Monitoring: A nesting bird survey report shall be submitted to the City to verify the results of the pre-construction survey.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?**

Less Than Significant Impact. The project description indicates that no work is proposed to occur within the storm drain channels found along three sides of the site, thus the project should not impact any of the riparian habitats or natural communities that border the project site. This impact is less than significant.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Less Than Significant Impact. The drainage channels that border the site contain tule and cattails which are wetland obligate species. No project work is proposed to take place in these channels. The channels fall under the jurisdiction of the California Fish and Game Code, and

the Clean Water Act and any work conducted in the channels would be subject to permits from the appropriate agencies, including the CDFW and the RWQCB.

The proposed project would avoid and minimize potential impacts to the drainage channels through compliance with applicable regulations, Best Management Practices (BMPs) to protect water quality and prevent erosion during construction, and project design intended to prevent polluted runoff water from entering the channel (see Section 3.10, Hydrology and Water Quality). In addition, a site-specific Erosion Control Plan has been prepared that includes BMPs to protect the drainage channels and associated resources that would be implemented during project construction. A storm water pollution prevention plan (SWPPP) containing BMPs to protect water quality would also be prepared and implemented during project construction. This impact would be less than significant.

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

Less than Significant Impact. The project site is in a developed area with limited wildlife habitat and with existing barriers to wildlife movement such as roads and buildings. The parcel is surrounded with walls and fencing, making it difficult to access for terrestrial species. Urban-adapted wildlife may occasionally use the natural and developed portions of the site, but no particularly important wildlife nursery areas are present in or adjacent to the project site or would be impacted by the project. The proposed project is redeveloping an already developed parcel in an urban area, demolishing and replacing existing buildings and paving. The project would not result in any physical barriers to wildlife movement or impede the use of native nursery sites, and any common, urban-adapted species that currently move through the project site or occasionally nest on the site would continue to be able to do so following project construction. This impact would be less than significant.

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

Less Than Significant Impact. Approximately 12 trees are scheduled to be removed as a result of project construction, six of which are designated as “protected trees”. The City of San Carlos requires a permit to be acquired for the removal of any tree that qualifies as a “protected tree” (City of San Carlos Municipal Code, section 18.18.070). Removal of these trees without a tree removal permit would be a potentially significant impact. In accordance with the provisions of section 18.18.070 of the City’s Municipal Code, the project will comply with the City of San Carlos tree removal permit conditions and replace trees that are removed in accordance with these tree removal policies. As described in Project Description, the project would plant 19 replacement trees for the removed Protected trees, which would exceed the Protected Tree Ordinance’s required replacement ratio of 2:1. The project proposes planting a total of 33 new trees, which would result in a total of 87 on-site trees. The project would provide one tree for every 9,209 sq. ft. of lot coverage. The newly installed trees would consist of red maple, coast live oak, and Chinese elm trees. The red maple tree species is a medium water use plant, while the coast live oak and Chinese elm species are very low and low water use species, respectively. All proposed shrub and grass plantings would be one- and five-gallon low water use species. Such compliance will reduce any potential impacts due to conflicts with the City’s tree preservation ordinance to less than significant levels under CEQA.

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

No Impact. The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or

state habitat conservation plan. Therefore, the project would not conflict with any such plans and the project would not have any impact on an adopted Habitat Conservation Plan.

3.4.4 References

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United States Fish and Wildlife Service (USFWS). 2023. Environmental Conservation Online System (ECOS): USFWS Threatened & Endangered Species Active Critical Habitat Report Online Mapper. Accessed November 08, 2023, at <https://ecos.fws.gov/ecp/report/table/critical-habitat.html>.

3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3.5.1 Environmental Setting

The following prehistoric, historic, modern environmental setting information is sourced from Initial Study/Mitigated Negative Declaration documentation for the recently approved (2022) 405 Industrial Road Life Science Project. The 405 Industrial Road Life Science Project site is located approximately 0.22 miles southeast of the project site.

Prehistoric

The first known human inhabitants of the San Carlos area were the Ohlone, who were named Costanoans by the Spanish (City of San Carlos 2022). Costanoan now refers to the name of their linguistic group. The Ohlone occupied a large territory in the South Bay, including the project site. This ethnographic group settled in large permanent groupings of households, forming large villages and tribal territories known as ‘tribelets’ – small independent groups of usually related families occupying a specific territory and speaking the same language or dialect.

More specifically, a concentration of Ohlone is believed to have lived in the Carmelita area of San Carlos, which lies in part of the City’s Planning Area. Native American archaeological sites tend to be located near waterways, as well as along ridge tops, mid-slope hill terraces, alluvial flats, the base of hills, and where two vegetation communities meet. San Francisco Peninsula’s proximity to both bay and marine resources led to the rapid rise in Native American tribe and tribelet populations. Due to urbanization in San Carlos and San Mateo County, archaeological data is largely missing.

Historic

The first Europeans to reach the San Francisco area were Spanish explorers in 1769 as part of the Portolá expedition (City of San Carlos 2022). In 1774, the de Anza expedition had set out to convert the Native American tribes to Christianity, resulting in the establishment of (among others) Mission San Francisco de Asis, (Mission Dolores) founded in 1776, and Mission Santa Clara de Asis, founded in 1777. The El Camino Real – which runs through San Carlos, parallel to Industrial Road – became a heavily traveled route between Mission Dolores and Mission Santa Clara in addition to other missions along the route. This route led to the establishment of inns and roadhouses to serve travelers along the way. In this historic period, the Ohlone people were subjugated and absorbed into the mission system, resulting in the loss of their freedom of movement, their culture, and customs.

During the Mexican rule of California (1822 through 1848), large tracts of land were issued to private individuals, usually cattle ranchers and hide and tallow traders. What is now San Carlos was part of a land grant issued in 1835, the “Rancho de las Pulgas” (Ranch of the Fleas), which was the largest land grant in the peninsula at 35,420 acres. What was to eventually become San Carlos was bought out of the land grant by an American, Timothy Phelps, as a dairy farm in the 1850s. In 1885 he made plans to develop a town, Phelpsville, but was unsuccessful. He then sold the land in 1887 in order to make way for further development. Three additional attempts were made to develop a town. In 1888 the San Carlos land company tried to subdivide and sell the land once owned by Phelps. Later, in 1907, the San Carlos Park Syndicate attempted to call the area ‘Oak Park’ and engaged on an elaborate sales campaign. Finally, in 1917, Frederick Drake of the Mercantile Trust installed gas and electricity to the area as well as improving the existing water infrastructure. By 1918, the first school was built, and the population slowly grew. In 1925 the residents voted for incorporation, and San Carlos was officially born. Drake continued to promote the town and coined the motto “The City of Good Living” (City of San Carlos 2022; San Carlos 2017).

Modern

At the time of incorporation in 1925, San Carlos had only 600 inhabitants. It wasn’t until the Second World War and post-war economic boom, that the City experienced a significant population increase. In 1940 it grew to 3,520 residents, and in 1950 it had a population of 14,371. It was in that post war boom when the City had an industrial boom. It wasn’t until 1952, that Industrial Road was conceived; when the Industrial Committee of the San Carlos Chamber of Commerce advocated for its construction to deal with traffic circulation problems on Brittan Avenue, which connected El Camino Real and Old County Road over Southern Pacific railroad tracks. At 5:00 PM every working day the street was jammed with cars as workers “poured out” of the industrial plants east of the railroad, as recorded by the San Mateo Times. Today the city is a predominantly residential settlement of 28,406 people, with its business and industrial area in the vicinity of the project site (City of San Carlos 2022).

Historic Environment

The National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR) contain buildings, structures, sites, and objects considered to be of historic significance on the National or State level, respectively. To be considered eligible for inclusion, buildings, structures and objects need to be 50 years or older. The CRHR allows a greater degree of flexibility in the age criteria, and some resources can be considered historically significance before meeting the age guidelines. Additionally, the City of San Carlos maintains a listing of 52 properties that are of historical significance known as the Historical Resources Inventory. These properties are considered significant on a local level.

Both the NRHP and the CRHR contain two buildings of historic significance in the City of San Carlos: the Nathaniel Brittan Party House and the Southern Pacific Depot. However, neither of the properties are located near the project site. No resources listed on the City of San Carlos’s Historical Resources Inventory are within the project site.

3.5.2 Regulatory Setting

Federal

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred

religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

State

California Environmental Quality Act

Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local register of historic resources or identified as significant in a local survey conducted in accordance with state guidelines are also considered historic resources under CEQA, unless a preponderance of the facts demonstrates otherwise. Per CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude a Lead Agency, as defined by CEQA, from determining that the resource may be a historic resource as defined in California Public Resources Code (PRC) Section 5024.1. CEQA applies to archaeological resources when (1) the archaeological resource satisfies the definition of a historical resource or (2) the archaeological resource satisfies the definition of a “unique archaeological resource.” A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

1. The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code Section 622.5

Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Government Code Section 6254(r)

Government Code explicitly authorizes public agencies to withhold information from the public relating to Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.

Native American Heritage Commission, Public Resources Code Sections 5097.9 – 5097.991

Section 5097.91 of the Public Resources Code (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified

cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Native American Graves Protection and Repatriation Act of 2001

Codified in the California Health and Safety Code Sections 8010–8030, the California Native American Graves Protection Act (NAGPRA) is consistent with the federal NAGPRA. Intended to “provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect,” the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The act also provides a process for non–federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Assembly Bill 52

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests in writing to the lead agency, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

Local

San Carlos General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following relevant archaeological resources policies and actions are from the General Plan’s Land Use Element.

- **Policy LU-12.1:** Evaluate historical and cultural resources early in the development review process through consultation with interested parties.
- **Policy LU-12.5:** Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.
- **Action LU-12.1:** Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural and historical resources.

3.5.3 Discussion

Would the project:

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

No Impact. The types of cultural resources that meet the definition of historical resources under Public Resources Code (PRC) Section 21084.146 generally consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. Archaeological resources (i.e., sites and all prehistoric resources) are discussed under b) below. Built environment historic resources are included in this section.

The project site does not contain any historic resources listed on either the CRHR or the NRHP.

MIG conducted a California Historical Resources Information System (CHRIS) search through the Northwest Information Center (NWIC). The search was completed on May 8, 2023. Within a 0.25-mile radius surrounding the project site, there is one known historic property listed on the CHRIS database. The Nell Building (CHRIS Number P-41-002196) historic property is located approximately 500 feet northwest of the project site.

Reports gained from the CHRIS search are primarily archaeological in nature, and are summarized in b), below.

According to a general site reconnaissance performed for the project by Terracon as part of the project Phase I Environmental Site Assessment (see Section 3.9, Hazards and Hazardous Materials), the existing Operations and Logistics Warehouse buildings were constructed in approximately 1955 (Terracon 2020). The existing Fleet Services building was constructed in approximately 1976. Therefore, the structures are a maximum of 68 years old.

Generally, under CEQA, the NRHP 50-year threshold is used as a guidance for determining if a structure has potential to be considered historically significant. The California Office of Historic Preservation (OHP) notes that buildings do not need to meet a 50-year threshold to be considered significant if sufficient time has passed to obtain a scholarly perspective on any events or individuals associated with the resource. However, there is no evidence of the buildings having significant connections to important people or events in history. While the Operations and Logistics Warehouse buildings meet the usual age to be considered potentially eligible for historical significance, the buildings are basic utilitarian structures with no architectural merit. As such, the existing Operations building, Logistics Warehouse building, and Fleet Services building would not be considered eligible. The existing on-site buildings are, therefore, not considered significant resources under CEQA, and demolition of the existing Logistics Warehouse and Fleet Services buildings would not impact a historic resource pursuant to §15064.5.

The project site is located in a developed, mixed-use area that does not contain historical resources. No buildings or structures in the vicinity eligible for the CRHR or NRHP would have their eligibility affected by the proposed project. As a result, there would be no impact to historic resources.

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

Less than Significant Impact with Mitigation Incorporated. MIG conducted a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC). The search was initiated on April 4, 2023, and was returned with negative results on April 12, 2023. Tribal representatives were contacted by email and certified mail on June 15, 2023, using the NAHC's contact list from a recent nearby project. MIG considers that due diligence has been completed by contacting all the tribal representatives identified by the NAHC for the proposed project.

The emails to tribal representatives requested pertinent information regarding cultural resources in the project vicinity and included a description of the project and a map showing the project location and project boundary. The tribes contacted on June 15, 2023, were the *Amah Mutsun Tribal Band of Mission San Juan Bautista*, the *Costanoan Rumsen Carmel Tribe*, the *Indian Canyon Mutsun Band of Costanoan*, the *Muwekma Ohlone Indian Tribe of the San Francisco Bay Area*, the *Ohlone Indian Tribe*, and the *Wuksache Indian Tribe/Eshom Valley Band*.

No reply was received from any of the contacted tribes. MIG understands that as the SLF search was negative and no tribe responded to the request, there are no known tribal resources in the project area that have the potential to be impacted by the project.

MIG conducted a CHRIS search through the NWIC. The CHRIS search was completed on May 8, 2023. No historic or prehistoric archaeological resources were discovered within the project site. As discussed under criterion a), one historic resource is recorded within a 0.25-mile radius of the project site. No prehistoric archaeological resources are recorded within a 0.25-mile radius of the project site. The CHRIS search also listed reports overlapping the project site and reports within the 0.25-mile search radius. The reports within the project site are summarized in Table 3-4 below.

Table 3-4: Cultural Reports within the Project Area

Report Number	Year	Title	Report Type
S-038684	2008	A Cultural Resources Study for the San Mateo County SMART Corridors Project	Archaeological research
S-038684a	2009	Smart Corridors Geoarchaeological Sensitivity Research	Archaeological field study
S-049125	2017	Historic Property Survey Report for the US 101 Managed Lanes Project	Archaeological, Architectural/historical
S-049125a	2017	Historic Resources Evaluation Report for the US 101 Managed Lanes Project	Architectural/historical field study
S-049125b	2017	Archaeological Survey Report and Extended Phase I Study, US 101 High-Occupancy Vehicle/Express (Managed) Lanes Project	Archaeological, Excavation, Field study
S-049125c	2017	Determinations of Eligibility for the Proposed Creation of Approximately 22 Miles of Managed Lanes along United States Highway 101	OHP Correspondence

An additional nine reports were identified by the NWIC as being within 0.25 miles of the project site. It should be noted, however, that these reports all failed to indicate the presence of archaeological resources within 0.25 miles of the project site. Reports S-038684 and S-049125 were retained for specific information on the project site.

S-049125

No prehistoric cultural material was noted anywhere on the field survey on and around the Holly Street interchange portion of the Study Area, which included geoarchaeological testing in the immediate vicinity of the project site. The report concluded that the construction of an interchange ramp off Holly Street would have no impact to cultural resources.

S-038684

Although report S-038684 was a wider ranging report, each discrete area of this report was analyzed for archaeological sensitivity. One of the areas of S-038684 consisted of a search area encompassing a portion of the project site extending east to west from Industrial Road to a line roughly halfway between Industrial Road and Highway 101, and north to south from the northwest to southeast corners of the project site. This search area did not encompass the entirety of the project site and included areas west of the project site across Industrial Road. The report indicated that the portion of the project site included in the search area has high sensitivity for prehistoric archaeological resources. The project site is situated over San Francisco Bay Mud (qhbm) as mapped by the United States Geological Survey (USGS). The

report states that Bay Mud has a greater chance of containing archaeological resources due to the rising water levels during the Holocene period, covering resources that may have lain on or near the waterfront at that time. The site was considered high sensitivity due to its location, as the report indicates that it is likely that the site was situated in a drier area for a significant period of time, allowing human settlement and development before being covered by Bay Mud during a period of higher sea levels.

As mentioned in report S-038684, the site was considered high sensitivity for prehistoric archaeological resources. However, the report did not take existing development and the lack of archaeological resources in the vicinity into significant consideration. No known prehistoric resources have been found despite significant development in the project vicinity, and the chance that such resources exist confined within the project area is reduced. However, it is possible that unknown archaeological deposits associated with historic periods of San Mateo County history or unrecorded Native American prehistoric archaeological sites exist in the project site, buried deeper under soils, particularly in or under Bay Mud deposits. If archaeological resources are present at the project site, it is likely that project activities (e.g., site preparation, grading, excavation, and trenching for utilities) would disturb or destroy such resources.

If any archaeological deposits meeting the definition of historical resource under Public Resources Code Section 21084.1 are damaged or destroyed by ground-disturbing construction activities, the ability of the deposits to convey their significance, either as containing information about prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired, and would constitute a significant impact to cultural resources.

Recognition of archaeological deposits before they are destroyed or damaged would reduce impacts to resources. In order for construction crews to recognize potential archaeological resources, the City will implement Mitigation Measure CUL-1 to require cultural resources training for construction personnel involved in ground disturbing activities.

Impact CUL-1: Project construction personnel may not recognize buried archaeological resources during project demolition and construction.

Mitigation Measure CUL-1: Conduct Archaeological Sensitivity Training. In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance.

The training shall include suitable photographic materials showing the kinds of artifacts and evidence of prehistoric archaeological sites likely to be found in the area, as well as written and verbal descriptions for archaeological resources and signs of potential archaeological discovery. The training will also include written materials describing what to do in the event of a discovery, or suspected discovery of an archaeological resource.

Effectiveness: This measure would minimize and/or avoid impacts to undiscovered archaeological resources, reducing potential impacts to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure prior to ground disturbance on the site.

Timing: Prior to project ground disturbance.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. The City shall ensure that archaeological training has been conducted for all personnel engaged in ground moving activities, prior to ground disturbance on the site.

Existing regulations would ensure that development and redevelopment activities allowed under the proposed project do not cause a substantial adverse change in a potential archaeological resource. The San Carlos General Plan includes policies that would address impacts to historical and pre-contact archaeological deposits (Policy LU-12.1, Policy LU-12.5, and Action LU-12.1).

To ensure compliance with existing regulations, the City will implement Mitigation Measure CUL-2 to address potential impacts to undiscovered archeological resources that may be unearthed during earthmoving activities associated with the proposed project.

Impact CUL-2: Project construction may unearth or disturb previously unidentified buried archaeological resources during project demolition and construction.

Mitigation Measure CUL-2: Protection of Archaeological Resources. In the event archaeological resources are unearthed during ground-disturbing activities, all ground-disturbing activities within 100 feet of the find shall be halted so that the find can be evaluated. Ground moving activities shall not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find.

All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards.

All Native American artifacts (tribal finds) shall be considered significant Tribal Cultural Resources, pursuant to PRC 21074, until the lead agency has enough evidence to make a determination of significance.

The City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. If appropriate, the archaeologist may introduce archaeological monitoring on all or part of the site. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.

Effectiveness: This measure would minimize and/or avoid impacts on undiscovered archaeological resources, reducing potential impacts to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event cultural resources are discovered.

Timing: During all earth moving phases of project construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. An archaeological report, if appropriate, will be written detailing all

archaeological finds and submitted to the City and the Northwest Information Center.

Implementation of these mitigation measures would ensure project impacts are less than significant.

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

Less than Significant Impact with Mitigation Incorporated. The project is not located on, within, or near a known historic or modern period cemetery. The potential for historic or modern human remains being present is extremely unlikely. Human remains associated with pre-contact Native American archaeological deposits have the potential to exist in soils below the project site. Due to the depth of excavation required for the project, if present, human remains would likely be disturbed by project activity.

The City's General Plan Land Use Element Policy 12.5 provides for the treatment of any human remains discovered during implementation of public and private projects within the City and ensure that said projects fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws. Additionally, the City would implement Mitigation Measure CUL-3 to reduce potential impacts should human remains be unearthed during earthmoving activities associated with the proposed project.

Impact CUL-3: Construction activities, particularly excavation and trenching, may disturb human remains during project demolition and construction.

Mitigation Measure CUL-3: Protection of Human Remains. If human remains are unearthed during ground-disturbing activities, Section 7050.5(b) of the California Health and Safety code will be implemented. Section 7050.5(b) states:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.

The County Coroner, upon recognizing the remains as being of Native American origin, is responsible to contact the Native American Heritage Commission (NAHC) within 24 hours. The Commission has various powers and duties, including the appointment of a Most Likely Descendant (MLD) to the Project. The MLD, or in lieu of the MLD, the NAHC, has the responsibility to provide guidance as to the ultimate disposition of any Native American remains.

Effectiveness: This measure would reduce impacts on previously unknown human remains to less than significant levels.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s)

shall implement this measure in the event human remains are discovered.

Timing: During all earth moving phases of project construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. The County Coroner will detail the findings in a coroner's report.

Implementation of Mitigation Measure CUL-3 would ensure project impacts to human remains would be less than significant.

3.5.4 References

_____. 2009. San Carlos 2030 General Plan General Plan. Adopted October 12, 2009.

_____. 2017. History of San Carlos, <https://www.cityofsancarlos.org/residents/about-san-carlos/san-carlos-history/-fsiteid-1>, accessed August 23, 2023.

_____. 2022. 405 Industrial Road Project Initial Study Checklist. August 9, 2022.

Native American Heritage Commission (NAHC). 2023. Unpublished letter containing search results from Sacred Lands File search. Kept on file at NAHC and with MIG, Inc.

Northwest Information Center (NWIC). 2023. File No. 22-1569. Unpublished confidential report containing search results from site specific survey. Kept on file at NWIC and with MIG, Inc.

Terracon Consultants, Inc. (Terracon). 2020. Phase I Environmental Site Assessment PG&E San Carlos Service Center 275 Industrial Road San Carlos, San Mateo County, California. October 29, 2020.

3.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.6.1 Environmental Setting

Energy consumption is closely tied to the issues of air quality and greenhouse gas (GHG) emissions, as the burning of fossil fuels and natural gas for energy has a negative impact on both, and petroleum and natural gas currently supply most of the energy consumed in California.

In general, California's per capita energy consumption is relatively low, in part due to mild weather that reduces energy demand for heating and cooling, and in part due to the government's proactive energy-efficiency programs and standards. According to the California Energy Commission, Californians consumed about 287,826 gigawatt hours (GWh) of electricity and 11,711 million therms of natural gas in 2022 (CEC 2024a and CEC 2024b).

In 2022, total electricity use in San Mateo County was 4,177 million kilowatt hours (kWh), including 2,581 million kWh of consumption for non-residential land uses (CEC 2024a). Natural gas consumption was 204 million therms in 2022, including 90 million therms from non-residential uses (CEC 2024b).

Energy conservation refers to efforts made to reduce energy consumption to preserve resources for the future and reduce pollution. It may involve diversifying energy sources to include renewable energy, such as solar power, wind power, wave power, geothermal power, and tidal power, as well as the adoption of technologies that improve energy efficiency and adoption of green building practices. Energy conservation can be achieved through increases in efficiency in conjunction with decreased energy consumption and/or reduced consumption from conventional energy sources.

3.6.2 Regulatory Setting

Since increased energy efficiency is closely tied to the State's efforts to reduce GHG emissions and address global climate change, the regulations, policies, and action plans aimed at reducing GHG emissions also promote increased energy efficiency and the transition to renewable energy sources. The U.S. EPA and the State address climate change through numerous pieces of legislation, regulations, planning, policy-making, education, and implementation programs aimed at reducing energy consumption and the production of GHG.

While there are numerous regulations that govern GHG emissions reductions through increased energy efficiency, the following regulatory setting description focuses only on regulations that: 1) provide the appropriate context for the proposed project's potential energy usage; and 2) may directly or indirectly govern or influence the amount of energy used to develop and operate the proposed improvements.

State Regulations

Title 24 Energy Standards and City of San Carlos Reach Codes

Part 11 of the Title 24 Building Standards Code is referred to as the California Green Building Standards Code (CALGreen Code). The CalGreen Code contains both mandatory and voluntary measures. For non-residential land uses there are 39 mandatory measures including, but not limited to, exterior light pollution reduction, wastewater reduction by 20 percent, and commissioning of Projects over 10,000 square feet. On January 25, 2021, the San Carlos City Council adopted Reach Codes, which expand upon the energy efficiency requirements contained in the CalGreen Code. The City's Reach Codes were approved by the CEC and went into effect on May 12, 2021 (San Carlos 2021a).

San Carlos Climate Mitigation and Adaptation Plan

On September 27, 2021, San Carlos adopted the Climate Mitigation and Adaptation Plan (CMAP) to reduce GHG emissions. The CMAP has goals which include reducing energy use, transitioning to carbon-free energy sources, promoting energy resilience, promoting development which reduces VMT, and using low-carbon transportation. It identifies strategies and actions to reduce energy consumption.

3.6.3 Discussion

Would the project:

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

Less than Significant Impact. Construction activities associated with the proposed project would require the use of heavy-duty, off-road equipment and construction-related vehicle trips that would combust fuel, primarily diesel and gasoline. Heavy-duty construction equipment would be required to comply with CARB's airborne toxic control measures, which restrict heavy-duty diesel vehicle idling to five minutes. Since petroleum use during construction would be temporary and needed to conduct development activities, it would not be wasteful or inefficient. Based on the construction phases, the duration of each phase, and the anticipated construction equipment, construction of the proposed project is estimated to use approximately 105,089 gallons of diesel, 9,544 gallons of gasoline, and 3,308 kWh of electricity (see Appendix B).

Once operational, the project site would function in a manner similar to existing conditions. Structures at the PG&E Service Center would consume energy in the form of electricity for building processes (e.g., heating and cooling, lighting, etc.), and in the form of petroleum products (e.g., gasoline and diesel) for vehicle trips made by the service vehicles and employees to and from the site.

The project would comply with the City's REACH Code. New buildings and major remodels associated with the project would be all-electric design. For all other energy standards not addressed by the City's REACH Code, the project would comply with whichever version of CalGreen Code is in effect at the time the building is proposed for construction.

As estimated using CalEEMod, existing structures associated with service center operations consume approximately 2,034,749 kWh of electricity and 2,130,146 kBtu of natural gas on an annual basis. These estimates are based on the land use types modeled (e.g., parking lot, office building, etc.) and the size of these land uses. As highlighted previously, the structures proposed by the project would be designed to all-electric standards. While actual operations at the site would be unchanged, the types and quantities of energy consumed at the site would be (i.e., because electricity would be required in lieu of natural gas and the site would include

charging infrastructure for electric vehicles). Based on the land use types and sizes used for estimating the site's emissions under proposed buildout conditions, the service center may consume up to approximately 3,810,491 kWh of electricity on an annual basis. Compared to existing, estimated energy consumption at the site, the site under proposed conditions increase annual electricity consumption by approximately 1,775,742 kWh and a decrease of annual natural gas consumption by approximately 2,130,146 kBtu.

It should be noted that although the results of the project's modeled energy consumption indicate an increase in electricity demand, this increase may be smaller in reality for several reasons. First, the existing land uses were modeled based on the same energy efficiency standards as the buildings proposed (i.e., older buildings are less efficient and therefore the existing land uses may consume more energy in reality). Also, some of the land uses modeled in CalEEMod, such as the covered storage areas, were modeled as general light industrial land uses, for which the model assumes greater energy demand than a structure used to shield materials from the elements (i.e., because the general light industrial land use assumes the structure would be enclosed and have space/water heating and other energy requirements associated with an enclosed structure). The proposed project would also include a solar PV system which would generate approximately 570,000 kWh of electricity annually, thereby reducing the amount of electricity that would be sourced from the grid.

Although the proposed project would increase energy demand at the site over the long term, it would do so in an efficient manner. The proposed project would meet or exceed the 2022 Title 24 Building Code requirements (i.e., because it would comply with the City's REACH Code), and improve the efficiency of older, less energy efficient buildings.

The proposed project would also implement several features that may help reduce the amount of single-occupancy employee vehicle trips to and from the site. It would provide approximately 27 bicycle parking spaces, including 11 long-term indoor spaces. The forms and quantity of energy the proposed project would consume are essential to successful and safe use of PG&E Service Center. As such, the proposed project's energy consumption would not be wasteful, inefficient, or unnecessary. This impact would be less than significant.

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

No Impact. The proposed project would not conflict with nor obstruct a state or local plan adopted for the purposes of increasing the amount of renewable energy or energy efficiency. As discussed under response a), the proposed project would be constructed to the City's REACH Code energy standards / requirements of the latest CalGreen Code, which would make it more energy efficient than many of the buildings currently in operation in the City and at the site. Furthermore, the proposed project would not conflict with the City's CMAP, since many of the actions in the CMAP consist of items the City will pursue (see Section 3.8, Greenhouse Gas Emissions) and do not apply to the project. No impact would occur.

3.6.4 References

California Energy Commission (CEC) 2024a. "Electricity Consumption by County." Electricity Consumption by County. CEC, Energy Consumption Database. n.d. Available online at <http://ecdms.energy.ca.gov/elecbycounty.aspx>.

_____. 2024b. "Gas Consumption by County." Gas Consumption by County. CEC, Energy Consumption Database. n.d. Available online at <http://ecdms.energy.ca.gov/gasbycounty.aspx>.

City of San Carlos (San Carlos). 2021a. Local Building Energy Standards. "Summary of City of San Carlos New Construction Requirements". February 26, 2021. Accessed May 24, 2021, at <https://www.cityofsancarlos.org/Home/ShowDocument?id=6531>.

_____. 2021b. City of San Carlos Climate Mitigation and Adaptation Plan. Adopted September 27, 2021

3.7 GEOLOGY AND SOILS

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

3.7.1 Environmental Setting

A Geotechnical Engineering Report and Addendum were prepared for Phase I of the proposed Master Plan project by Terracon Consultants, Inc. (Terracon), dated November 3, 2020, and January 6, 2021, respectively. The findings of the Geotechnical Engineering Report (henceforth referred to as “geotechnical report” or “report”) pertain only to the security wall, gate, and fence construction and rehabilitation or reconstruction of new pavement associated with the installation of new perimeter security features. These improvements were completed in 2022 as part of Phase I of the proposed site Master Plan. Therefore, while the geotechnical report provides relevant characterization of the project site’s geology and subsurface conditions, the

project Applicant will be required to prepare and submit a geotechnical report specific to the remaining phases of the Master Plan project, including the construction of the new Logistics Warehouse & Shops building, Fleet building, and Material storage building, for City review and approval prior to the issuance of building permits for the project.

Regional Geology

The project site and the surrounding parts of San Carlos are located on the San Francisco Peninsula, which is set within the larger Coast Ranges Geomorphic Province. This province is characterized by northwest-southeast trending mountain ranges that stretch from the Oregon border on the north to Point Conception on the south. In the San Francisco Bay area, most of the Coast Ranges are underlain by the tectonically complex, Jurassic-to Cretaceous-age sedimentary and metamorphic bedrock of the Franciscan Complex.

Site Conditions

The project site is relatively flat with up to approximately two feet of relief between the highest and lowest points of the property (Terracon 2020). Local geologic maps indicate subsurface conditions consist of Holocene age artificial fill consisting of poorly to well consolidated gravel, sand, silt, and rock fragments underlain by Bay Mud.

Groundwater

Groundwater depths recorded from borings were recorded during drilling and for a short duration following drilling. Groundwater was encountered during drilling in the borings at depths of approximately 5 to 19.5 below ground surface. Groundwater levels beneath the site likely fluctuate due to seasonal variations in the amount of rainfall, runoff, tide and other factors (Terracon 2020). The Phase I Environmental Site Assessment described in detail in Section, 3.9 Hazards and Hazardous Materials, reported summarized previous site clean-up efforts to remove contamination caused by leaking underground fuel tanks. This previous monitoring of on-site groundwater wells reported depths to groundwater as shallow as 1.5 feet below ground surface (Terracon 2020). The geotechnical report notes groundwater level fluctuations should be considered when developing the design and construction plans for the project.

Faulting and Seismicity

The San Francisco Bay Area contains numerous active faults and is considered seismically active. Numerous small earthquakes occur every year in the San Francisco Bay Region, and larger earthquakes have been recorded and can be expected to occur in the future.

The type and magnitude of seismic hazards affecting the site are dependent on the distance to causative faults and the intensity and magnitude of the seismic event. Segments of the San Andreas Fault, which is located approximately 4.3 miles from the project site, are considered to have the most significant potential effect at the project site from a design standpoint (Terracon 2020).

During a major earthquake on a segment of one of the nearby faults, strong to very strong shaking is expected to occur at the site. Strong shaking during an earthquake can result in ground failure such as that associated with fault rupture, soil liquefaction, lateral spreading, and cyclic soil densification.

3.7.2 Regulatory Setting

State Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. There are no Alquist-Priolo

earthquake fault zones on the Project site (Langan Engineering and Environmental Services, Inc. 2021).

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was passed in 1990 following the Loma Prieta earthquake to reduce threats to public health and safety and to minimize property damage caused by earthquakes. The act directs the U.S. Department of Conservation to identify and map areas prone to the earthquake hazards of liquefaction, earthquake-induced landslides, and amplified ground shaking. The act requires site-specific geotechnical investigations to identify potential seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy within the Zones of Required Investigation.

California Building Code

The 2019 California Building Codes (CBC) covers grading and other geotechnical issues, building specifications, and non-building structures.

California Public Resources Code

Section 5097 of the Public Resources Code specifies the procedures to be followed in the event of the unexpected discovery of historic, archaeological, and paleontological resources, including human remains, historic or prehistoric resources, paleontological resources on nonfederal land. The disposition of Native American burials falls within the jurisdiction of the California Native American Heritage Commission (NAHC). Section 5097.5 of the Code states the following:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

Local Regulations

San Carlos General Plan

The City adopted the San Carlos General Plan: Envision 2030 in October 2009. The following are the relevant policies and actions in the Community Safety and Services Element:

- **Policy CSS-1.1:** The City Building Official shall verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard and appropriate mitigation measures. Based on the findings of these reports, the City shall require that new structures are designed and built to withstand the effects of seismically-induced ground failure.
- **Policy CSS-1.2:** Prohibit structural development in known areas where seismic and geological hazards cannot be mitigated.
- **Policy CSS-1.3:** Continue to monitor and enforce mitigation measures to reduce risk for projects where geological and seismic hazards can be mitigated.
- **Policy CSS-1.4:** Enforce requirements of the Alquist-Priolo Special Studies Zones Act should any fault traces in San Carlos be discovered and prove to be active or potentially active.
- **Policy CSS-1.5:** Continue to incorporate seismic risk analysis into the City's ongoing building inspection program through thorough review of projects by plan check and field inspections.

- **Policy CSS-1.9:** Continue to ensure that seismic hazards are mitigated to the greatest extent possible for critical public facilities, infrastructure and emergency services.

City of San Carlos Municipal Code

The City of San Carlos Municipal Code contains the following sections, which may be applicable to the proposed project:

12.08.165 Grading—Seasonal prohibitions

Grading shall be prohibited during the rainy season as defined in the Municipal Regional Permit, unless the City Engineer or his/her designee finds that the land disturbance is relatively minor and that erosion can be easily controlled, or is a necessary and integral part of an interim plan for previously initiated project phases, or is necessary to prevent an imminent threat to public safety as determined by the City Engineer or his/her designee.

12.08.180 Grading—Drainage restrictions.

No grading shall be conducted in such a manner as to alter the established gradient of natural drainage channels in such a manner as to cause excessive erosion or flooding

12.08.190 Grading—Slopes and banks

- A. The exposed or finished banks or slopes of any fill or excavation shall be uniformly graded, and no such slope, bank or inclined graded surface shall exceed a vertical height of thirty feet unless intercepting drains or terraces are provided. Such drains or terraces shall be permanently lined or protected with approved materials, and accumulating surface waters shall be conducted to an approved point of discharge. Berms shall be provided to prevent overflow from any such terrace or intercepting drain.
- B. All exposed or finished banks or slopes of any fill or excavation having a slope steeper than three horizontal to one vertical shall be protected from erosion by approved planting, cribbing, walls or terracing, or a combination thereof. Other unprotected graded surfaces exceeding five thousand square feet in area shall be planted, paved or built upon, or shall be provided with berms and approved drainage facilities adequate to prevent erosion and to conduct the accumulation or runoff of surface waters to an approved place of discharge (San Carlos 2024).

3.7.3 Discussion

Consistent with the California Supreme Court decision in *California Building Industry Association v. Bay Area Air Quality Management District* (62 Cal. 4th 369; 2015), the impact discussion presented below focuses on the project's effect on geology and soils rather than the effect of geologic hazards and site conditions upon the proposed project. The project is evaluated to determine whether it would create or exacerbate soil or geologic conditions identified in each of the above significance threshold criteria.

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault?**

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. There are no known active faults that traverse the project site, and the site is not within an Alquist-Priolo zone (Terracon 2020). No impact would occur.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in the San Francisco Bay Area which is considered one of the most seismically active regions in the United States. Significant earthquakes have occurred in this area and strong to violent ground-shaking in the project area can be expected because of a major earthquake on one of the faults in the region. The 2014 Working Group on California Earthquake Probabilities estimated that the 30-year probability of a magnitude 6.7 or greater earthquake striking the San Francisco Bay area was 72 percent (WGCEP 2015).

The project would not create potential for or exacerbate existing conditions related to seismic ground shaking. The proposed project would be designed and constructed in accordance with the current California Building Code requirements for seismic safety. This impact would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction occurs when loose, saturated sandy soils lose strength and flow like a liquid during earthquake shaking. Liquefaction can damage foundations, disrupt utility service, and cause damage to roadways.

The project site is located within a State-designated liquefaction hazard zone (CGS 2024). The City of San Carlos requires projects to comply with the 2023 California Building Code (Title 24, California Code of Regulations), which provides for stringent construction requirements on projects in areas of high seismic risk. The seismic design standards of the CBC are intended to prevent catastrophic structural failure in the most severe earthquakes currently anticipated. The project would be required to comply with the most current CBC standards for the design of proposed buildings, non-occupied structures, and pavements to resist the effects of seismic-related ground failure, including liquefaction.

Although there is the potential for earthquake-induced soil liquefaction on site, the project would adhere to all recommendations contained in the site-specific geotechnical analysis in addition to relevant California Building Code (CBC) and American Concrete Institute (ACI) design code provision. This impact would be less than significant.

iv) Landslides?

No Impact. The project site and surrounding area are relatively level and are not subject to landslide hazards. Therefore, the proposed project would have no impacts related to landslides. No impact would occur.

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

Less Than Significant Impact. The project would not cause erosion or loss of topsoil in the long term because the project site is currently approximately 88 percent impervious surface area and the project would redevelop the site with new buildings and structures, paved areas, and landscaping following construction. No bare soils would be present. However, project construction would require grading or soil exposure that could result in temporary erosion and/or loss of topsoil if not controlled.

The project would require the preparation of a Storm Water Pollution Prevention Plan (SWPPP) to prevent stormwater pollution during construction as a requirement of the Statewide General Construction Permit (GCP) (see Section 3.10, Hydrology and Water Quality, for further discussion of the GCP). After construction, the project site would be improved (i.e., repaved but also feature more permeable space for groundwater filtration) and would not leave surface soils susceptible to erosion or loss. Implementation of the site-specific SWPPP during construction and restoration of the site post-construction would prevent significant soil erosion or loss of topsoil. In addition, the project would comply with San Carlos Municipal Code Sections

12.08.165 (Grading—Seasonal prohibitions), 12.08.180 (Grading—Drainage restrictions), and Section 12.08.190 (Grading—Slopes and Banks). In addition, the project Applicant has prepared an Erosion Control Plan (Plan Set, Sheet C7.00, 7/19/2024), which will be implemented to avoid or minimize soil erosion or the loss of topsoil associated with project construction activities.

Compliance with these plans and regulations would prevent erosion and loss of topsoil during construction activities. This impact would be less than significant.

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

Less Than Significant Impact. As described above, the topography at the project site is relatively flat. The potential for on- or off-site landslides is considered extremely low because of the absence of significant slopes in the project vicinity. Furthermore, the project would not exacerbate landslide conditions on or adjacent to the site.

Lateral spreading involves the lateral movement of a liquefied soil layer (and overlying layers) toward a free face caused by seismic shaking. These lateral ground movements are often associated with a weakening or failure of an embankment or soil mass overlying a continuous layer of liquefied sand or weak soils. The project would adhere to all recommendations contained in the site-specific geotechnical analysis, the CBC, and relevant portions of the ACI design code intended to resist potential effects, if any, of lateral spreading. There would be a low potential for buildings on site to suffer damage due to liquefaction and lateral spreading after following geotechnical recommendations and design codes.

Subsidence is the sinking of the Earth's surface in response to geologic or man-induced causes. The principal causes are mining, withdrawal of groundwater or oil, karst formations, oxidation of organic soils, and thawing of permafrost. The proposed project may involve groundwater extraction in order to construct the new building foundations; however, the project will be required to comply with site-specific geotechnical report recommendations so that groundwater levels outside of the excavation area do not lower (i.e., increasing the potential of subsidence / settlement). Therefore, the project is not expected to have significant impacts related to subsidence.

As stated previously, the project site has the potential for liquefaction (CGS 2024). The proposed project would be required to comply with CBC requirements related to liquefaction hazard mitigation, which would ensure potential risks to people and structures as a result of unstable soils on the project site would be less than significant.

Conclusion

The proposed project shall be designed and constructed in accordance with the current California Building Code and a site-specific geotechnical report, whose requirements will be reflected in City building permits issued for the new buildings and structures proposed under the project. This impact would be less than significant.

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

No Impact. The project site is not in an area with expansive soils according to Figure 8-4, Expansive Soils, of the San Carlos General Plan (City of San Carlos 2023). No impact would occur.

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

No Impact. The proposed project would not require the construction or use of septic tanks or alternative wastewater disposal systems. Wastewater generated by the proposed project would be conveyed to the existing municipal sanitary sewer system that is maintained and operated by the City of San Carlos Public Works Department. Therefore, the proposed project would not have the potential to result in impacts related to septic tanks or alternative wastewater disposal systems. No impact would occur.

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

Less Than Significant Impact with Mitigation Incorporated. There are no known paleontological resources or unique geologic features at the project site. However, the proposed project excavation and earth moving activities could encounter soils beyond prior depths of disturbance. Due to possible excavation into previously undisturbed soils, the proposed project has the potential to encounter previously undisturbed paleontological resources. The implementation of Mitigation Measure GEO-1 would avoid impacts to any paleontological resources uncovered during project construction.

Impact GEO-1: Project demolition and construction could unearth paleontological resources, including fossils.

Mitigation Measure GEO-1: Protection of Paleontological Resources. If paleontological resources are discovered during construction, ground-disturbing activities shall halt immediately until a qualified paleontologist can assess the significance of the discovery. Depending on determinations made by the paleontologist, work may either be allowed to continue once the discovery has been recorded, or if recommended by the paleontologist, recovery of the resource may be required, in which ground-disturbing activity within the area of the find will be temporarily halted until the resource is recovered. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines and current professional standards.

Effectiveness: This measure would reduce impacts to paleontological resources to less than significant.

Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event any paleontological resources are discovered.

Timing: During all earth moving phases of project demolition and construction.

Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of paleontological mitigation. If paleontological resources are uncovered, a report shall be prepared by the qualified paleontologist describing the find and its deposition.

3.7.4 References

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3.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.8.1 Environmental Setting

Gases that absorb and emit infrared thermal radiation (heat) in the atmosphere and affect regulation of the Earth's temperature are known as greenhouse gases (GHGs). There are many compounds present in the Earth's atmosphere which are GHGs, including but not limited to water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). GHGs allow solar radiation (sunlight) to enter the atmosphere freely. When solar radiation strikes the earth's surface, it is either absorbed by the atmosphere, land, and ocean surface, or reflected back toward space. The land and ocean surface that has absorbed solar radiation warms up and emits infrared radiation toward space. GHGs absorb some of this infrared radiation and "trap" the energy in the earth's atmosphere. Entrapment of too much infrared radiation produces an effect commonly referred to as the "Greenhouse effect." Human activities since the beginning of the Industrial Revolution (approximately 1750) have increased atmospheric GHG concentrations. Average global surface temperatures have risen as a result of GHG emissions. This increase in globally averaged surface temperatures is commonly referred to as "Global Warming," although the term "Global Climate Change" is preferred because effects associated with increased GHG concentrations are not just limited to higher global temperatures (NOAA, 2024b).

GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments such as swamps or exposed permafrost (methane); however, GHG emissions from human activities such as fuel combustion (e.g., carbon dioxide) and refrigerants use (e.g., hydrofluorocarbons) significantly contribute to overall GHG concentrations in the atmosphere, climate regulation, and global climate change.

Human production of GHG has increased steadily since pre-industrial times (approximately pre-1880) and atmospheric carbon dioxide concentrations have increased from a pre-industrial value of 280 parts per million (ppm) in the early 1800's to 423 ppm in January 2024 (NOAA 2024a). The effects of increased GHG concentrations in the atmosphere include climate change (increasing temperature and shifts in precipitation patterns and amounts), reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

The 1997 United Nations' Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These

GHGs are the primary GHGs emitted into the atmosphere by human activities. The six common GHGs are described below.

Carbon Dioxide (CO₂). CO₂ is released to the atmosphere when fossil fuels (oil, gasoline, diesel, natural gas, and coal), solid waste, and wood or wood products are burned.

Methane (CH₄). CH₄ is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in municipal solid waste landfills and the raising of livestock.

Nitrous oxide (N₂O). N₂O is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels.

Sulfur hexafluoride (SF₆). SF₆ is commonly used as an electrical insulator in high voltage electrical transmission and distribution equipment such as circuit breakers, substations, and transmission switchgear. Releases of SF₆ occur during maintenance and servicing as well as from leaks of electrical equipment.

Hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs). HFCs and PFCs are generated in a variety of industrial processes.

GHG emissions from human activities contribute to overall GHG concentrations in the atmosphere and the corresponding effects of global climate change (e.g., rising temperatures, increased severe weather events such as drought and flooding). GHGs can remain in the atmosphere long after they are emitted. The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO₂, which has a GWP of one. By comparison, CH₄ has a GWP of 25, which means that one molecule of CH₄ has 25 times the effect on global warming as one molecule of CO₂. Multiplying the estimated emissions for non-CO₂ GHGs by their GWP determines their carbon dioxide equivalent (CO₂e), which enables a project's combined global warming potential to be expressed in terms of mass CO₂ emissions. GHG emissions are often discussed in terms of Metric Tons of CO₂e, or MTCO₂e.

Existing Site GHG Emissions

Operational activities associated with the existing service center generate GHG emissions from various sources, however, the two biggest sources are from energy consumption (i.e., combustion of natural gas and imbedded GHG emissions in electricity consumption) and vehicular use (i.e., by worker and vendor trips to the site that generate GHG during petroleum fuel combustion).

3.8.2 Regulatory Setting

State Regulations

California Global Warming Solutions Act (AB 32) and Related Legislation

California Air Resources Board (CARB) is the lead agency for implementing Assembly Bill (AB) 32, the California Global Warming Solutions Act adopted by the Legislature in 2006. AB 32 requires the CARB to prepare a Scoping Plan containing the main strategies that will be used to achieve reductions in GHG emissions in California.

Executive Order B-30-15, 2030 Carbon Target and Adaptation, issued by Governor Brown in April 2015, sets a target of reducing GHG emissions by 40 percent below 1990 levels in 2030. By directing state agencies to take measures consistent with their existing authority to reduce GHG emissions, this order establishes coherence between the 2020 and 2050 GHG reduction goals set by AB 32 and seeks to align California with the scientifically established GHG emissions levels needed to limit global warming below two degrees Celsius.

To reinforce the goals established through Executive Order B-30-15, Governor Brown went on to sign SB 32 and AB 197 on September 8, 2016. SB-32 made the GHG reduction target to reduce GHG emissions by 40 percent below 1990 levels by 2030 a requirement as opposed to a goal. AB 197 gives the Legislature additional authority over CARB to ensure the most successful strategies for lowering emissions are implemented, and requires CARB to, “protect the state’s most impacted and disadvantaged communities ...[and] consider the social costs of the emissions of greenhouse gases.”

On September 16, 2022, Governor Newsom signed into law AB 1279, the California Climate Crisis Act, and SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022. AB 1279 codified California’s 2045 carbon neutrality goal and established a GHG emission reduction target of 85% below 1990 levels. SB 1020 set targets for the retail sale of electricity of 90% clean electricity by 2035 and 95% by 2040, and 100% by 2045. It also set a target for 100% clean electricity for electricity serving state agencies by 2035.

2022 Scoping Plan

The CARB Scoping Plan is the comprehensive plan primarily directed at identifying the measures necessary to reach the GHG reduction targets stipulated in AB 32. The key elements of the 2008 Scoping Plan were to expand and strengthen energy efficiency programs, achieve a statewide renewable energy mix of 33 percent, develop a cap-and-trade program with other partners (including seven states in the United States and four territories in Canada) in the Western Climate Initiative, establish transportation-related targets, and establish fees (CARB, 2009). CARB estimated that implementation of these measures will achieve at least 174 million MTCO₂e of reductions and reduce statewide GHG emissions to 1990 levels by 2020 (CARB, 2009).

In a report prepared on September 23, 2010, CARB indicated 40 percent of the reduction measures identified in the Scoping Plan had been secured (CARB 2010). Although the cap-and-trade program began on January 1, 2012 (after CARB completed a series of activities dealing with the registration process, compliance cycle, and tracking system), covered entities did not have an emissions obligation until 2013. In August 2011, the Scoping Plan was reapproved by CARB with the program’s environmental documentation.

On February 10, 2014, CARB released the public draft of the “First Update to the Scoping Plan.” “The First Update” built upon the 2008 Scoping Plan with new strategies and recommendations and identified opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments (CARB 2014). “The First Update” defined CARB’s climate change priorities over the next five years, and set the groundwork to reach post-2020 goals set forth in Executive Orders S-3-05 and B-16-12. It also highlighted California’s progress toward meeting the 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. “The First Update” evaluated how to align the State’s long-term GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. “The First Update” to the Scoping Plan was approved by the Board on May 22, 2014.

The second update to the scoping plan, the 2017 Climate Change Scoping Plan update (CARB 2017), was adopted by CARB in December 2017. The primary objective for the 2017 Climate Change Scoping Plan is to identify the measures required to achieve the mid-term GHG reduction target for 2030 (i.e., reduce emissions by 40 percent below 1990 levels by 2030) established under EO B-30-15 and SB 32. The 2017 Climate Change Scoping Plan identifies an increased need for coordination among State, regional, and local governments to realize the potential for GHG emissions reductions that can be gained from local land use decisions. The third update to the scoping plan, the 2022 Scoping Plan, was released in May 2022 and adopted by CARB in December 2022 (CARB 2022b). The plan presents a scenario for

California to meet the State goal of reducing GHG emissions 40% below 1990 levels by 2030 and to achieve carbon neutrality by 2045 (CARB 2022b).

Local Regulations

Plan Bay Area 2050

In January 2009, California SB 375 went into effect known as the Sustainable Communities and Climate Protection Act. The objective of SB 375 is to better integrate regional planning of transportation, land use, and housing to reduce greenhouse gas emissions and other air pollutants. SB 375 tasks CARB to set GHG reduction targets for each of California's 18 regional Metropolitan Planning Organizations (MPOs). Each MPO is required to prepare a Sustainable Communities Strategy (SCS) as part of their Regional Transportation Plan (RTP). The SCS is a growth strategy in combination with transportation policies that will show how the MPO will meet its GHG reduction target. If the SCS cannot meet the reduction goal, an Alternative Planning Strategy may be adopted that meets the goal through alternative development, infrastructure, and transportation measures or policies.

Plan Bay Area was the integrated long-range transportation, land-use, and housing plan developed for the Bay Area pursuant to SB 375 that was adopted by the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) in 2013. An update to *Plan Bay Area*, titled *Plan Bay Area 2040*, was jointly approved by the ABAG Executive Board and by MTC in 2017. *Plan Bay Area* and *Plan Bay Area 2040* identified Priority Development Areas, which were transit-oriented infill development opportunities in areas where future growth would not increase urban sprawl.

On October 1, 2021, MTC and ABAG released *Plan Bay Area 2050* which focused on the elements of Housing, Economy, Transportation, and Environment. Across these elements, there were a total of 35 strategies, which are long-term policies or investments, and 80 implementation actions, which contain advocacy and legislation, initiatives, and planning and research. *Plan Bay Area 2050* projected that it would achieve a 20% reduction in GHG emissions from cars and light duty trucks by 2035 if all of its strategies were implemented, which would meet SB 375's GHG target.

2017 Clean Air Plan

As discussed in Section 3.3, Air Quality, the BAAQMD's *2017 Clean Air Plan* is a multi-pollutant plan focused on protecting public health and the climate (BAAQMD 2017). The *2017 Clean Air Plan* lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050, consistent with GHG reduction targets adopted by the state of California. As opposed to focusing solely on the nearer 2030 GHG reduction target, the *2017 Clean Air Plan* makes a concerted effort to imagine and plan for a successful and sustainable Bay Area in the year 2050. In 2050, the Bay Area is envisioned as a region where:

- Energy efficient buildings are heated, cooled, and powered by renewable energy;
- The transportation network has been redeveloped with an emphasis on non-vehicular modes of transportation and mass-transit;
- The electricity grid is powered by 100 percent renewable energy; and
- Bay Area residents have adopted lower-carbon intensive lifestyles (e.g., purchasing low-carbon goods in addition to recycling and putting organic waste to productive use).

The *2017 Clean Air Plan* includes a comprehensive, multipollutant control strategy that is broken up into 85 distinct measures and categorized based on the same economic sector

framework used by CARB for the AB 32 Scoping Plan Update.⁶ The accumulation of all 85 control measures being implemented support the three overarching goals of the plan. These goals are:

- Attain all state and national air quality standards;
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Reduce Bay Area GHG Emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

San Carlos Climate Mitigation and Action Plan

In October 2009, the San Carlos adopted the City of San Carlos Climate Action Plan (2009 CAP). This plan established a 2005 baseline for GHG emissions and set a goal of reducing GHG emissions by 15% below 2005 levels by 2020 and included measures on energy, solid waste management, transportation, and land use. San Carlos updated the CAP in September 2021 by adopting the Climate Mitigation and Adaptation Plan (CMAP).

The CMAP set a goal of reducing GHG emissions 40% below 1990 levels by 2030 and 80 % below 1990 levels by 2050, or equivalently of reducing GHG emissions 49 percent below 2005 levels by 2030 and 83 percent below 2005 levels by 2050. The CMAP consists of an emissions inventory, a climate change vulnerability assessment, 33 GHG reduction strategies, 12 climate adaptation strategies, and implementation and monitoring through 2050.

The GHG reduction strategies in the CMAP contain a combination of education and outreach programs, financial subsidies, and mandates across the sectors of energy, transportation and land use, off-road, waste, water, and wastewater. These strategies aimed to accomplish the plan's goals by reducing energy use, transitioning to carbon-free energy sources, promoting energy resilience, promoting sustainable development that reduces VMT, transitioning to low-carbon transportation, supporting pollution-free outdoor equipment, becoming a zero-waste community, and reducing community-wide water use. The CMAP projected that with existing and planned government actions and the implementation of CMAP's strategies, San Carlos would meet the 2030 and 2050 emissions targets and be consistent with the state's AB 32 and SB 32 GHG reduction goals (San Carlos 2021).

3.8.3 Discussion

Global climate change is the result of GHG emissions worldwide; individual projects do not generate enough GHG emissions to influence global climate change. Thus, the analysis of GHG emissions is by nature a cumulative analysis focused on whether an individual project's contribution to global climate change is cumulatively considerable.

Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b) Conflict with an applicable, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

⁶ The sectors included in the AB 32 Scoping Plan Update are: stationary (industrial) sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants.

Less Than Significant Impact. (Responses a – b). The proposed project would generate GHG emissions from both short-term construction and long-term operational activities. Construction activities would generate GHG emissions primarily from equipment fuel combustion as well as worker, vendor, and haul trips to and from the project site during demolition, grading/excavation, foundation construction, vertical building development, etc. Construction activities would cease to emit GHGs upon completion, unlike operational emissions that continue year after year until the buildings constructed as part of project close or cease operation. Once operational, the proposed project would generate GHG emissions from the area, energy, stationary, and mobile sources described in Section 3.3.3, as well as electricity consumption, refrigerants, water use and wastewater generation, and solid waste generation.

On April 20, 2022, the BAAQMD adopted new thresholds of significance for GHG emissions that address emissions through the Year 2030. For project-level assessments, the BAAQMD's updated GHG thresholds provide two options for assessing the significance of a project's GHG emissions, as presented below.

- A. Projects must include, at a minimum, the following project design elements:
 1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA section 21100(b)(3) and section 15126.2(b) of the State CEQA Guidelines.
 2. Transportation
 - a. Achieve compliance with electric vehicle (EV) requirements in the most recently adopted version of CALGreen Tier 2.
 - b. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
- B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines section 15183.5(b).

Consistent with Option B, this Initial Study evaluates the proposed project's GHG emissions based on consistency with the City's CMAP, which is a qualified GHG reduction strategy that meets the criteria under CEQA Guidelines section 15183.5(b).

City of San Carlos Climate Mitigation and Action Plan

An analysis of the proposed project's consistency with potentially applicable measures in the City's CMAP is provided in Table 3-5.

Table 3-5: Project Consistency with the City of San Carlos's Climate Mitigation Action Plan

Applicable Measures	Consistency Analysis
Energy	
Strategy 5: Building Codes. Advance electrification through local amendments to the California Building Code.	Consistent. The project would include all-electric building design for new buildings and

Table 3-5: Project Consistency with the City of San Carlos's Climate Mitigation Action Plan

Applicable Measures	Consistency Analysis
	infrastructure renovations for existing buildings to be all-electric.
Strategy 6: Rooftop Solar. Continue to support and increase participation in rooftop and onsite solar energy systems in the community and at City facilities.	Consistent. The project would include construction of a new solar PV system, approximately 21,000 square feet in size that would produce approximately 570,000 kWh of electricity annually.
Transportation and Land Use	
Strategy 17: Vehicle Miles Traveled. Reduce community-wide transportation-related emissions per resident and employee, with an emphasis on reductions from existing and new development in the city's core commercial, office, and industrial areas, including development on the east side.	Not Applicable. The proposed project would change neither trip generation nor VMT.
Strategy 18: Electric Vehicles. Support residents and business owners to transition to electric and plug-in hybrid vehicles	Consistent. The project would include 35 EV parking spaces with charging stations.
Waste	
Strategy 27: Construction and Demolition Waste. Increase the amount of waste recycled during construction and demolition of buildings.	Consistent. The project would divert construction waste from landfills, consistent with CalGreen Code requirements and City Municipal Code Chapter 8.05.
Strategy 28: Composting and Recycling. Partner with RethinkWaste to expand commercial and multi-family residential recycling and composting programs.	Consistent. To the extent it is feasible, PG&E will implement recycling within the Operations building.
Water	
Strategy 32: Water-wise Landscaping. Promote drought tolerant and firewise landscaping.	Consistent. The project's landscaping plan would include native and drought-resistant plants to the maximum extent feasible.
Adaptation and Resilience	
Strategy 37: Heat Island Effect. Minimize the urban heat island effect	Consistent. The project would be subject to the 2022 Title 24 Building Code, which would require the proposed buildings to have roofs that meet the aged solar reflectance and thermal emittance requirements specified in CalGreen Code Section 140.3(a)(1)(A)(ii).
Source: See Appendix B	

As shown in Table 3-5, the proposed project would be consistent with the City's CMAP. As described below, the project would also not conflict with the CARB 2022 Climate Change Scoping Plan, ABAG/MTC Plan Bay Area 2050, or BAAQMD 2017 Clean Air Plan.

CARB 2022 Climate Change Scoping Plan

Nearly all of the specific measures identified in the 2022 Climate Change Scoping Plan would be implemented at the state level, with CARB and/or another state or regional agency having the primary responsibility for achieving required GHG reductions. The proposed project, therefore, would not directly conflict with any of the specific measures identified in the 2022 Climate Change Scoping Plan. The proposed project would, however, be of an all-electric

design (i.e., no natural gas connections or appliances to the proposed buildings), install 35 EV charging stations for employee and PG&E electric vehicles, and include an approximately 21,000 square foot solar PV system. These project components support the State's long-term GHG emission reduction goal of becoming carbon neutral by 2045.

SB 375 and Plan Bay Area 2050

The proposed project would be consistent with the relevant strategies in Plan Bay Area 2050 by adding bicycle parking and storage infrastructure and installing electric vehicle charging stations. These project elements may help encourage employees at the site to use modes of transportation that do not involve the combustion of fossil fuels.

BAAQMD 2017 Clean Air Plan

The project would not conflict with or obstruct implementation of the BAAQMD's 2017 *Clean Air Plan* (BAAQMD 2017b). The 2017 *Clean Air Plan* includes GHG emissions from construction and operational GHG emissions sources in its emissions inventories and plans for achieving Clean Air Plan goals. As discussed in Section 3.3.3, the proposed project would not conflict with applicable control measures contained in the 2017 *Clean Air Plan*. The project would also be consistent with the city's CMAP, which is designed to align the city's GHG emissions with the State's 2030 GHG reduction goal.

GHG Emissions Conclusion. The proposed project's GHG emissions are not anticipated to be above those of the existing Service Center operations, because there is no anticipated change in mobile source emissions. Additionally, building renovations would improve overall energy efficiency, and in compliance with the City's REACH Code the new buildings would be all-electric. Therefore the project would not conflict, obstruct, or otherwise interfere with the implementation of a plan, policy, or regulation for the purposes of reducing GHG emissions. This impact would be less than significant.

3.8.4 References

- Bay Area Air Quality Management District (BAAQMD) 2017. 2017 Clean Air Plan: Spare the Air, Cool the Climate. BAAQMD, Planning, Rules, and Research Division. April 19, 2017.
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3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.9.1 Environmental Setting

The project site has functioned as a regional PG&E Service Center since the mid-1970's (Terracon 2020). As such hazardous materials have been used and stored at the site for long periods of time. A Phase I Environmental Site Assessment (see detailed discussion below) was prepared for the site which identified a number of long-term industrial operations on site, including automotive repair services, use of solvents, underground hydraulic lifts, an existing waste oil underground storage tank, interior floor drains within the fleet services building, wash area, two oil/water separators, and storage of waste transformers, since the mid-1970s. The site also stores telephone poles which are treated with hazardous chemicals that can contaminate pavement, surface soils, and stormwater runoff.

The site is surrounded by other industrial and commercial land uses that also use and store hazardous materials. This is described further below under the C/CAG – MRP Soil and Stormwater Testing Program discussion.

Phase I Environmental Site Investigation (Phase I ESA)

The following discussion is sourced directly from the Phase I ESA prepared for the project. The Phase I ESA should be read in full for a comprehensive understanding of the information presented below (see Appendix D).

In October 2020, Terracon prepared a Phase I Environmental Site Assessment (ESA) to identify Recognized Environmental Conditions (RECs)⁷ in connection with the site. The Phase I ESA included a review of historical information about the project site, a records review, and site reconnaissance. According to the Phase I ESA, the project site is listed on over one dozen federal and state regulatory databases (p. ii). Based on Terracon's review of the California State Water Resources Control Board's (State Water Board's) GeoTracker database in 2020, the site has three closed leaking underground storage tank (LUST) cases:

- GeoTracker Case No. T0608100397; Open Date: 8/4/1986, Close Date: 11/21/2000; Chemicals of Concern: Gasoline
- GeoTracker Case No. T0608110718; Open Date: 10/10/2002, Close Date: 5/31/2005; Chemicals of Concern: Waste Oil / Motor / Hydraulic / Lubricating Oil
- GeoTracker Case No. T10000011097; Open Date: 11/7/2017, Close Date: 12/3/2018; Chemicals of Concern: None Specified

A review of the San Mateo County Department of Environmental Health's (SMCDEH) records for the 1986 LUST case (GeoTracker Case No. T0608100397), the project site underwent a subsurface investigation in January 1986 that identified a release of petroleum hydrocarbons to soil and groundwater within the vicinity of two diesel and gasoline fuel tanks (Phase I ESA, p. ii).

Based on the Case Closure letter prepared by the SMCDEH and dated March 22, 2000, two 5,000-gallon gasoline USTs, one 2,000-gallon diesel UST, and one 550-gallon waste oil UST were removed from the site in February 1987. Additionally, one in-ground hydraulic lift was removed in 1999. Records of confirmation sampling conducted for the hydraulic lifts were not identified in Terracon's review.

Six groundwater monitoring wells were installed, and groundwater was reported at depths as shallow as 1.5 feet below ground surface (bgs). Groundwater flow direction was reported to the southwest to northeast and varied seasonally and due to tidal influences. Residual concentrations remaining in soil were reported as 47,000 milligrams per kilogram (mg/Kg) of total petroleum hydrocarbons as hydraulic oil (TPH-HO). The LUST case was closed on November 21, 2000, with land use restrictions in place. The Case Closure letter indicated due to the remaining concentrations of TPH-HO remaining in soil, the San Carlos Building Department would require notification prior to future excavation or development of the site (Phase I ESA, p. iii).

A Case Closure letter prepared by the SMCDEH and dated May 31, 2005 was available on GeoTracker for Case No. T0608110718. The Case Closure letter indicates the site was equipped with one 520-gallon waste oil UST located on the northern exterior of the Fleet Services Building. A subsurface investigation was conducted in 2004 included the advancement of five soil borings adjacent to the waste oil UST and piping and one on the interior of the Fleet Services Building. One soil sample was collected from each boring and submitted for laboratory analysis of total petroleum hydrocarbons as gasoline-range organics (TPH-GRO), diesel-range

⁷ A recognized environmental condition (REC) as defined in ASTM 1527-13 means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property (U.S. EPA, February 13, 2024).

organics (TPH-DRO), motor oil-range organics (TPH-MO), total oil and grease (TOG), benzene, toluene, ethylbenzene, xylenes (BTEX), methyl tert butyl ether (MTBE), and Leaking Underground Fuel Tank (LUFT) five metals cadmium, chromium, lead, nickel, and zinc. Sampling results indicate residual concentrations up to 440 micrograms per liter (µg/L) of TPH-GRO, 1,300 µg/L of TPH-DRO, 4,300 µg/L of TPH-MO, 9,000 µg/L of TOG, and 19 µg/L of MTBE. The Case Closure letter indicates the waste oil UST remained active at the site and clean-up measures included extraction and disposal of 1,000 gallons of groundwater in October 2002. The case was closed on the condition that the SMCDEH must be notified if excavation or development of the site are proposed (Phase I ESA, p. iii). The City of San Carlos has notified SMCDEH of the proposed project which has indicated that PG&E shall submit a Soil and Groundwater Management Plan for this redevelopment work. PG&E or its consultant can submit the plan directly to SMCDEH for review and approval prior to issuance of a building permit.

A Case Closure memorandum prepared by the San Mateo County Groundwater Protection Program (SMCGPP) and dated September 18, 2018 was retrieved from GeoTracker for Case No. T10000011097. The memorandum indicates the site's UST system was removed in November 2017 and replaced with an aboveground system. The UST system reportedly comprised one 10,000-gallon biodiesel UST, one 10,000-gallon gasoline UST, associated piping, and dispenser equipment. A groundwater sample collected from the UST excavation was reported with 3,800 µg/L of TPH-GRO. The Case Closure memorandum indicates a second subsurface investigation was conducted in 2018 that demonstrated the petroleum release was limited in extent and magnitude. Additional groundwater concentrations from the 2018 investigation were reported with maximum concentrations of TPH-DRO of 130 µg/L and 17 µg/L of MTBE. The SMCGPP granted the case closure under the Low Threat Closure Policy (LTCP). Terracon compared the reported groundwater sampling results to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) Environmental Screening Levels (ESLs) for vapor intrusion risk levels. The reported concentrations of TPH-GRO, TPH-DRO, and MTBE are below their respective vapor intrusion ESLs for residential and commercial/industrial land use scenarios (Phase I ESA, pp. iii – iv).

According to the Phase I ESA, the project site's listing on the California Hazardous Materials Incident Reporting System (CHMIRS) database reported a transformer leaking into a containment area on August 21, 2008. The spill was reportedly contained (Phase I ESA, p. iv).

Various hazardous wastes generated by the site are reported under the HAZNET database listing, including polychlorinated biphenyls (PCBs) and material containing PCBs, oil/water separation sludge, unspecified oil-containing waste, liquids with halogenated organic compounds greater than or equal to 1,000 milligrams per liter (mg/L), hydrocarbon solvents, oxygenated solvents, and unspecified solvent mixture (Phase I ESA, p. iv).

Terracon conducted a site reconnaissance on September 8, 2020. During the site reconnaissance, Terracon observed: two emergency generators, one air compressor, four aboveground dual post hydraulic lift units, one underground hydraulic lift with pooled oil, one filled-in underground hydraulic lift, one boiler tank with de minimis staining, four fan rooms, one cooling tower, one liquid chiller, wash area, two parts washers, eight compressed natural gas (CNG) aboveground storage tanks (ASTs), three 120-gallon motor oil ASTs with de minimis staining, one 210-gallon hydraulic oil AST, one 12,000-gallon dual-compartment gasoline and diesel AST, 100+ hazardous materials and waste storage containers in sizes ranging from 5 to 55 gallons, one 275-gallon diesel exhaust fluid (DEF) tote, 48 compressed gas tanks in sizes ranging from 40 to 200-cubic feet (CF), one Chemfeed System, a 520-gallon waste oil UST, two oil/water separators (OWSs), interior floor drains, two pole-mounted transformers, two pad-mounted transformers, new transformers ranging in various sizes, waste transformers, and approximately 41 dumpsters and hoppers (Phase I ESA, p. iv).

The Phase I ESA identified several recognized environmental conditions (RECs) and controlled recognized environmental conditions (CRECs) in connection with the project site. The first REC comprises the long-term industrial operations on site, including automotive repair services, use of solvents, underground hydraulic lifts, an existing waste oil UST, interior floor drains within the fleet services building, wash area, two oil/water separators, and storage of waste transformers, since the mid-1970s. The lack of a subsurface investigation related to these features and the documented solvent use, and the associated potential for undocumented spills or releases to have occurred, represents a REC. The second REC is the limited site access that has prevented observation of portions of the exterior surface conditions. Due to the large quantities of materials storage, dumpsters and hoppers, storage containers, and parked vehicles located throughout the site and the site's long-term industrial operations (~45 years), the lack of observation of exterior surface conditions throughout the site represents a REC. Lastly, the residual concentrations of TPH-DRO and MTBE in soil and TPH-GRO in groundwater that remain in place at the site and the conditional case closures associated with the former USTs and closed LUST cases detailed above represent a CREC (Phase I ESA, p. v).

Based on the information collected and analyzed for the Phase I ESA, Terracon recommended further investigation to assess the above-identified RECs. In accordance with SMCDEH requirements, the agency must be notified prior to excavation or development at the site (Phase I ESA, p. vi).

Limited Site Investigation (LSI)

The following discussion is sourced directly from the Limited Site Investigation prepared for the project. The Limited Site Investigation should be read in full for a comprehensive understanding of the information presented below (see Appendix D).

In May 2021, Terracon prepared a Limited Site Investigation (LSI) to evaluate selected soil and groundwater samples for the presence or absence of total petroleum hydrocarbons, volatile organic compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), California Administrative Manual (CAM) 17 heavy metals, and Polychlorinated Biphenyls (PCBs) as a result of the identified site RECs and CREC. Terracon conducted a geophysical survey of the site to identify subsurface anomalies, such as utility corridors, advanced temporary sampling wells (TSWs) for the collection of soil and groundwater samples, and completed laboratory analyses of the collected soil and groundwater samples (LSI, p. 2). The drilling of eight soil borings for soil sampling and the completion of eight TSWs occurred on March 24, 2021. The soil borings for TSW1, 2, 3, 6, 7, and 8 were advanced to total depths of 15 feet bgs and TSW4 and TSW5 were advanced to total depths of 20 and 25 feet bgs, respectively (LSI, p. 5). Groundwater was encountered between approximately 10.6 and 13.0 feet bgs in TSWs, except for TSW4 and TSW5, where groundwater was encountered at 18.2 and 22.4 feet bgs, respectively (LSI, p. 6). One groundwater sample was taken for each TWS, resulting in a total of eight collected groundwater samples. The TSWs were removed and the soil borings were backfilled with cement following collection of soil and groundwater samples.

Selected soil samples were analyzed for:

- Total petroleum hydrocarbons (TPH) as gasoline range organics (GRO), TPH diesel range organics (DRO), and TPH motor-oil range organics (ORO) by Environmental Protection Agency (EPA) Method 8015;
- Volatile organic compounds (VOCs) by EPA Method 8260;
- Semi-volatile organic compounds (SVOCs) by EPA Method 8270;
- Polychlorinated biphenyls (PCBs) by EPA Method 8082;
- California Administrative Manual Metals by EPA Methods 6010B/7471A; and
- Chromium Waste Extraction Test (WET) by EPA Method 6010B.

Selected groundwater samples were analyzed for:

- TPH (GRO, DRO, ORO) by EPA Method 8015;
- VOCs by EPA Method 8260B; and
- SVOCs by EPA Method 8270C.

The soil analytical laboratory results were compared to the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB) Environmental Screening Levels (ESLs) for direct exposure human health risk levels (HHRLs) for commercial/industrial land use and construction worker safety scenarios (LSI, p. 7). The groundwater analytical laboratory results were compared to California MCLs and Commercial / Industrial HHRLs for Groundwater Vapor Intrusion.

The laboratory results identified several VOCs above EPA laboratory regulatory levels (RLs), but below ESLs for commercial/industrial land use and construction worker safety and 15 metals were detected above laboratory RLs. Concentrations of antimony, barium, beryllium, cadmium, chromium, cobalt, copper, lead, molybdenum, vanadium, zinc, and mercury were reported in concentrations below their respective ESLs for commercial/industrial land use and construction worker safety. The reported arsenic concentrations fall within or below the United States Geological Survey (USGS) statistical average of the reported background soil concentrations. Seven of the eight soil samples were reported with concentrations of nickel that exceed the non-cancer hazard ESL for construction worker safety of 86 mg/Kg. The nickel concentrations were reported below the ESLs for commercial industrial land use. SVOCs, PCBs, and TPH-GRO were not detected in the analyzed soil samples. TPH-DRO and TPH-ORO were either non-detect or detected in small concentrations below the established commercial/industrial and construction worker safety ESLs (LSI, p. 8). With the exception of chromium, the reported analytical soil results did not exceed the Characteristic Waste “rule of thumb” screening levels for toxicity. Terracon requested WET procedure testing for the soil sample with the highest detected chromium levels. The WET procedure reported soluble chromium concentration fell below the Soluble Threshold Limit Concentration (STLC) screening values (LSI, p. 9).

The laboratory results identified detectable TPH-GRO, but detected concentrations did not exceed the California MCLs of 760 µg/L. TPH-DRO detected in three groundwater samples exceeded the MCL of 200 µg/L. TPH-mo was detected in seven of the eight groundwater samples. An MCL has not been established for TPH-ORO. The following VOCs were detected in some of the groundwater samples: acetone, benzene, carbon disulfide, 1,2-dichlorobenzene, cis-1,2-dichloroethene, 2-butanone (MEK), 4-methyl-2-pentanone (MIBK), and 1,1,1-trichloroethane. The detected VOC concentrations did not exceed the MCLs except in the case of 1,1-dichloroethane and methyl tert-butyl ether (MTBE). None of the detected concentrations of VOCs exceeded the Groundwater Vapor Intrusion ESLs for commercial/industrial land uses. The SVOC dibenz (a,h)anthracene was detected in groundwater samples at concentrations that exceeded the MCL (LSI, pp. 9-10); however, MCLs are established for drinking water and because the groundwater beneath the site is not utilized for drinking water, the exceedance of the MCL in this case is not a concern.

Based on the laboratory testing results summarized above, Terracon concluded the on-site soils appear to be suitable for on-site reuse based on a continued commercial/industrial land use. Soils exported during future site development will likely need additional testing to satisfy licensed transporter/receiving facility requirements. Based on the data collected to date, soils that may be destined for export do not appear to meet the characteristics of toxicity, and therefore, would not comprise a California regulated waste (LSI, p. 11).

Regarding groundwater contamination, Terracon concluded the groundwater results indicate some impacts from organic chemicals that may pose limitations to discharge should dewatering occur as a part of the proposed development. Direct discharge to a municipal separate storm

sewer system (MS4) may be unlikely versus discharge to a publicly-owned treatment works (POTW) (LSI, p. 11). Disposal of dewatered groundwater would be addressed in the Soil and Groundwater Management Plan that PG&E must prepare and submit to SMCDEH for review and approval prior to issuance of a building permit.

Based on the reported concentrations of arsenic in soils and TPH, VOCs, and SVOCs in groundwater, the LSI recommended that a soil and groundwater management plan (SGMP) be prepared and implemented before proposed redevelopment activities commence. The SGMP shall include provisions for notifications to contractors, and subcontractors concerning §5194. Hazard Communication. The LSI also recommended disclosing the soil analytical results to the selected receiving facility that may accept export from the site, should export to a licensed receiving facility become necessary (LSI, p. 11).

C/CAG – Municipal Regional Permit (MRP) Soil and Stormwater Testing Program

The City of San Carlos participates in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System (NPDES) permit. The Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act require that large urban areas discharging stormwater into the San Francisco Bay or the Pacific Ocean have an NPDES Municipal Regional Permit (MRP) (Order No. R2-2015.0049) to prevent harmful pollutants from being dumped or washed by stormwater runoff, into the stormwater system, then discharged into local waterbodies.

The MRP outlines the State's requirements for municipal agencies in San Mateo County to address the water quality and flow-related impacts of stormwater runoff. Some of these requirements are implemented directly by municipalities while others are addressed by the SMCWPPP on behalf of all the municipalities. See detailed discussion of the MRP in Section 3.10.3 below in Hydrology.

The MRP requires a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation. C/CAG conducts the monitoring program on behalf of all member agencies and submits monitoring reports to San Francisco Regional Water Quality Control Board (RWQCB).

The Pollutant of Concern (POC) Monitoring Data Report is prepared annually in accordance with MRP Provision C.8.h.iv. The POC Monitoring Report included POC monitoring locations, number and types of samples collected, purpose of sampling (i.e., Management Questions addressed), and analytes measured. In addition, consistent with MRP Provision C.8.h.ii, POC monitoring data generated from sampling of receiving waters (e.g., creeks) were submitted to the San Francisco Bay Area Regional Data Center for upload to the California Environmental Data Exchange Network (CEDEN).

Provision C.8.f of the MRP requires monitoring of several POCs including polychlorinated biphenyls (PCBs), mercury, copper, emerging contaminants, and nutrients. Provision C.8.f specifies yearly (i.e., Water Year or WY) and total (i.e., permit term) minimum numbers of samples for each POC. In addition, POC monitoring must address the five priority management information needs (i.e., Management Questions) identified in C.8.f:

1. **Source Identification** – identifying which sources or watershed source areas provide the greatest opportunities for reductions of POCs in urban stormwater runoff;
2. **Contributions to Bay Impairment** – identifying which watershed source areas contribute most to the impairment of San Francisco Bay beneficial uses (due to source intensity and sensitivity of discharge location);

3. **Management Action Effectiveness** – providing support for planning future management actions or evaluating the effectiveness or impacts of existing management actions;
4. **Loads and Status** – providing information on POC loads, concentrations or presence in local tributaries or urban stormwater discharges; and
5. **Trends** – providing information on trends in POC loading to the Bay and POC concentrations in urban stormwater discharges or local tributaries over time.

Sampling conducted under this program has detected very high levels of PCBs in drainage ditches along Industrial Road near the PG&E Service Center. As described below, sampling results from 2016 through 2018 found high levels of PCBs originating from industrial businesses that are north and across the street from the PG&E Service Center. Figure 19 – San Carlos Watershed Management Area Sampling Locations shows PCB sampling locations along Industrial Road. Specific sites are discussed below.

The following text is summarized from the 2016 and 2018 San Mateo Countywide Water Pollution Prevention Program, Pollutants of Concern Monitoring - Data Reports (EOA 2017 and EOA 2019).

Watershed Management Area (WMA) 75 Location

WMA-75 is a 66-acre catchment comprised entirely of old industrial land uses. Sample SM-SCS-75A (Industrial Rd Ditch) was collected in WY 2016 and had a PCBs particle ratio of 6,140 ng/g, which is among the highest levels found in Bay Area stormwater samples collected to-date. The sample station is located where the MS4 (Municipal Separate Storm Sewer System) daylight into a ditch on the east side of Industrial Road downstream of the adjacent Delta Star (270 Industrial Road) and Tiegel Manufacturing (495 Bragato Road) properties. The Countywide Program collected seven sediment samples in WY 2017 in the area. Two of these samples were collected near the Delta Star and Tiegel properties. One was collected in the storm drain line directly downstream of both properties and had a very elevated PCBs concentration (49.4 mg/kg). The other was also elevated, with a PCBs concentration of 1.20 mg/kg, and was collected from surface sediments at the location where the Tiegel property drains into the public right-of-way.

Delta Star manufactures transformers, including transformers with PCBs historically (from 1961 to 1974). Delta Star was a property on the Federal “Superfund” National Priorities List with a known history of PCB pollution in soil and groundwater. PCBs migrated to the adjacent Tiegel property at 495 Bragato Road, a roughly three-acre site that is largely unpaved. A “Removal Action” under DTSC oversight was implemented between June 1989 and January 1991 to remove soil impacted with PCBs exceeding 25 ppm. The Delta Star and Tiegel properties are currently determined to be in compliance with public health, safety, and the environmental cleanup goals based on exposure at the site. However, based on the PCBs concentrations in the sediment and stormwater runoff samples, the site appears to be a source of PCBs to the MS4 and San Francisco Bay at levels that are a concern from the standpoint of the Bay PCBs TMDL (i.e., contribute to bioaccumulation in Bay fish and other wildlife). The Countywide Program recently worked with the City of San Carlos to refer this property to the Regional Water Board for potential additional investigation and abatement.

In WY 2018, SMCWPPP collected a sample across the street from Delta Star in front of the PG&E property. The sample had a PCBs concentration of 0.76 mg/kg. It is not believed that the PCBs in this sample originated from the PG&E property given that the sample only drained a portion of the front parking lot, PCBs tend to create a halo effect around polluted areas, and that the entire MS4 in this area consistently contains groundwater and PCBs potentially could have been conveyed up the pipe.

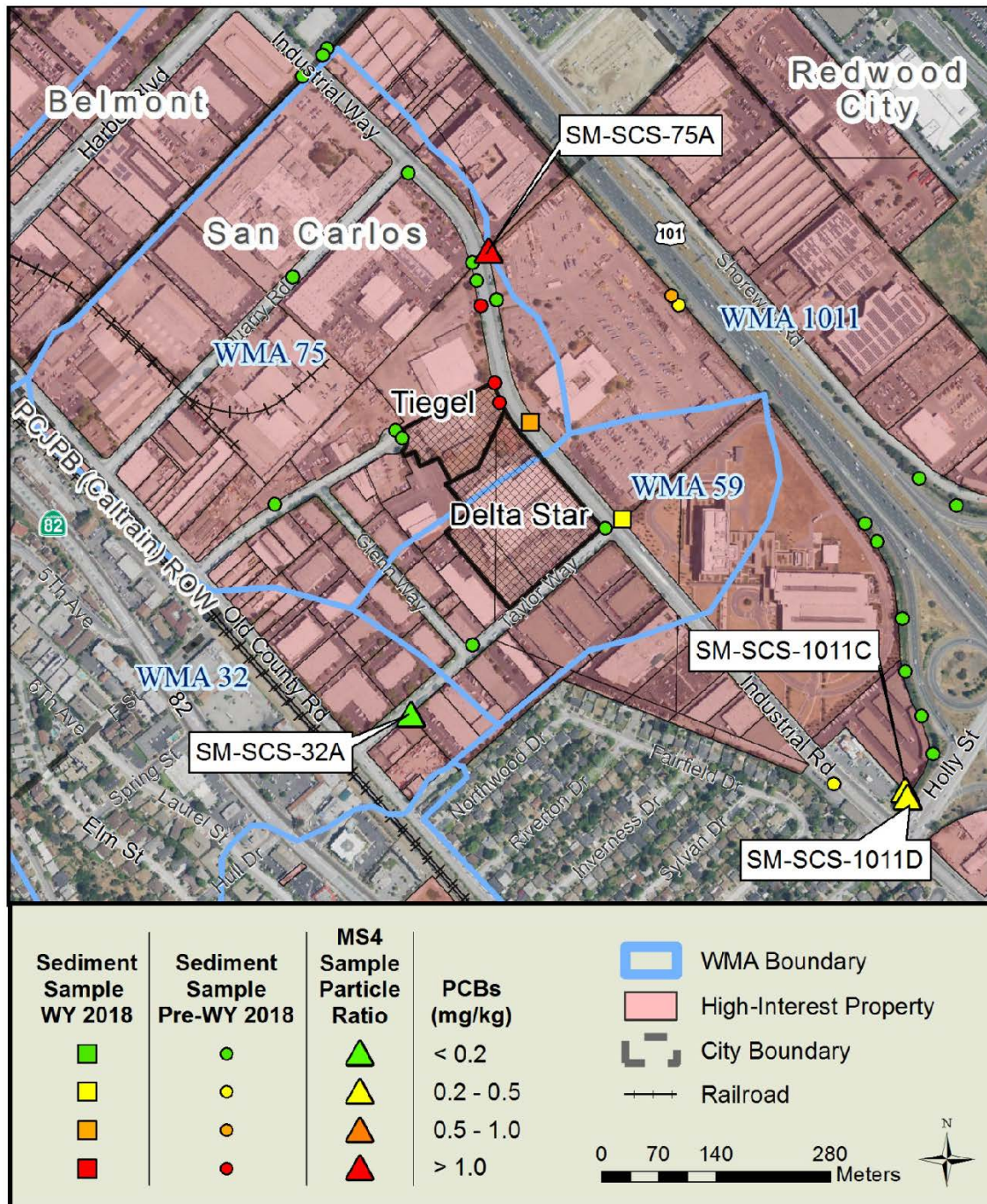


Figure 15. WMAs 59, 75, and 1011

Source: San Mateo County Water Pollution Prevention Program, Pollutants of Concern Monitoring Data Report, Water Year 2019.

Figure 19 San Carlos Watershed Management Area Sampling Locations

275 Industrial Road PG&E San Carlos Service Center Project

The remainder of the PG&E property drains toward the east. The remaining samples were not elevated, suggesting that there are no other sources of PCBs in this WMA other than these two properties (Figure 15).

WMA-32 Location

WMA 32 is a relatively small catchment (67 acres) in the City of San Carlos. It is located adjacent to WMA 75 which contains the Delta Star Corporation property. Sample SM-SCS-32A (Taylor Way SD) was collected by in WY 2016 and had a PCB particle ratio of 484 ng/g, the third highest of the water samples collected in WY 2015 and WY 2016 in San Mateo County. The catchment contains a very small area of old industrial land use and some of the Caltrain right-of-way. It is possible that the source of the moderately elevated PCB particle ratio in Catchment 32 is from a “halo effect” of the nearby Delta Star property.

Next steps

The PCBs monitoring data collected to-date has informed identification of several potential source properties located in the City of San Carlos. The Countywide Program is working with the City regarding next steps at these sites. This included recently developing and submitting to the Regional Water Board referrals of two areas for potential further PCBs investigation and abatement (EOA 2019):

- 270 Industrial Road (Delta Star) / 495 Bragato Road (Tiegel), which are adjacent properties in San Carlos.
- 977 and 1007/1011 Bransten Road, another set of adjacent properties in San Carlos.

The Countywide Program will continue its POC monitoring program in compliance with Provision C.8.f of the MRP. As in previous years, yearly minimum requirements will be met for all monitoring parameters. This includes conducting PCB and mercury monitoring that focuses on San Mateo County WMAs containing high interest parcels with land uses potentially associated with PCBs such as old industrial, electrical and recycling. This monitoring will continue to be coordinated with stormwater runoff monitoring in San Mateo County catchments (EOA 2019).

3.9.2 Regulatory Setting

Federal Regulations

Resource Conservation Recovery Act

The 1976 Resource Conservation Recovery Act (RCRA) (42 U.S.C. §6901 et seq.) gives the U.S. Environmental Protection Agency (EPA) the authority to control hazardous waste from cradle to grave. This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid wastes. The RCRA was amended in 1986 to allow the EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. Most of the compliance monitoring responsibility under the RCRA is delegated to the states and local authorities.

Comprehensive Environmental Response, Compensation, and Liability Act

The 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) (42 U.S.C. §9601 et seq.) provides a Federal "Superfund" to clean up uncontrolled or abandoned hazardous-waste sites as well as accidents, spills, and other emergency releases of pollutants and contaminants into the environment. The EPA cleans up orphan sites when potentially responsible parties cannot be identified or located, or when they fail to act. Through various enforcement tools, the EPA obtains private party cleanup through

orders, consent decrees, and other small party settlements. Superfund site identification, monitoring, and response activities in states are coordinated through the state environmental protection or waste management agencies.

Hazardous Materials Transportation Act

The 1975 Hazardous Materials Transportation Act (HMTA) (49 U.S.C. §5101 et seq.) is the principal Federal law governing the transportation of hazardous materials. The HMTA sets regulations for procedures and policies, material designations and labeling, packaging requirements, and operational rules to guide the safe transportation of hazardous materials. The HMTA preempts state and local governmental requirements that are inconsistent with the statute, unless that requirement affords an equal or greater level of protection to the public than the HMTA requirement.

International Fire Code

The International Fire Code (IFC) (2021) is a model code that contains regulations to safeguard life and property from fires and explosion hazards. The IFC covers general precautions, emergency planning and preparedness, fire department access and water supplies, automatic sprinkler systems, fire alarm systems, special hazards, and the storage and use of hazardous materials. The IFC has been adopted for use as a base code standard by many jurisdictions in the United States.

State Regulations

California Code of Regulations Title 22

California Code of Regulations (CCR) Title 22 (Social Security) Division 4.5 (Environmental Health Standards for the Management of Hazardous Waste) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. CCR Title 22 Division 4.5 identifies wastes that are subject to regulation as hazardous waste, sets standards for generators and transporters of hazardous waste and owners and operators of hazardous waste transfer, treatment, storage, and disposal facilities; establishes the hazardous waste permit program; contains requirements pertaining to specific types of hazardous wastes; and more. The Department of Toxic Substances Control (DTSC) implements most chapters under this division.

California Code of Regulations Title 27

California Code of Regulations (CCR) Title 27 (Environmental Protection) contains the current regulations of CalRecycle and the State Water Resources Control Board pertaining to waste disposal on land. CCR Title 27 regulates the treatment, storage, and disposal of solid wastes by establishing criteria for waste management units, facilities, and disposal sites; setting documentation and reporting procedures for regulatory tiers, permits, waste discharge requirements (WDRs), and plans; and setting standards for special treatment, storage, and disposal units.

Cortese List

California Government Code Section 65962.5 established the "Cortese List", which requires state agencies to compile a list of all properties affected by hazardous waste and develop a framework for how they will continue to be monitored and addressed by the State. A site's presence on the list has bearing on the local permitting process as well as on compliance with the California Environmental Quality Act (CEQA).

California Asbestos Standards in Construction

The California Division of Occupational Safety and Health (Cal/OSHA) enforces the California Asbestos Standards in Construction (8 CCR Section 1529). These standards regulate exposure

to asbestos in all construction work including demolition of structures. These regulations establish entry and exit procedures after working in asbestos contaminated areas and establish specific control measures designed to protect workers depending on the type of asbestos they are handling. Such procedures include minimum air circulations, use of respirators, wetting of materials, clothing laundering, construction and demolition equipment requirements, and shielding specifications. Notification procedures are also in place that require building owner and employee noticing as well as external and internal hazard signage. All asbestos workers are required to complete training programs and register as an asbestos contractor, depending on the type of asbestos being removed. Medical examination requirements are also required to monitor worker health, generally on an annual basis.

California Construction Safety Orders for Lead

Title 8, Section 1532.2 (Lead) of the California Code of Regulations establishes the requirements for any construction worker who may be exposed to lead during demolition or salvage, removal or encapsulation, new construction, and cleanup activities. The construction safety orders establish an action level of 30 micrograms of lead per cubic meter ($\mu\text{g}/\text{cm}^3$) of air calculated over an 8-hour time-weighted average without regard for the use of a respirator, meaning this is the limit where safety protocols must be initiated, such as use of a respirator. Under no circumstance may a worker be exposed to 50 $\mu\text{g}/\text{cm}^3$ over an 8-hour weighted period. These regulations require implementation of engineering and work practice controls such as respiratory protection, protective clothing, housekeeping, hygiene practices, and signage requirements to meet worker exposure limits. Medical monitoring and training requirements are also identified.

Hazardous Materials Business Plan (CERS Annual Submittal)

In 1986, the California Governor's Office of Emergency Services (Cal OES) established the Hazardous Materials Business Plan (HMBP) Program, which prevents or minimizes damage to the public and the environment from a release of hazardous materials. Under the Program, California businesses that handle hazardous materials were required to submit an HMBP each year. Assembly Bill 1429, which was passed on July 9, 2019, would require a business with a facility that is not required to submit Tier II information pursuant to the above-mentioned federal provision and is not subject to the provisions governing those aboveground storage tanks to submit its business plan once every three years, instead of annually.

Local Regulations

San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit

The Municipal Regional Permit (MRP) Order No. R2-2022-0018, NPDES Permit No. CAS612008, issued May 11, 2022, is a comprehensive permit that regulates municipal stormwater systems. The MRP addresses the water quality and flow-related impacts of stormwater runoff on receiving waters, including creeks, San Francisco Bay, and the ocean. Some of these requirements are implemented directly by municipalities while others are addressed by the San Mateo Countywide Water Pollution Prevention Program on behalf of all the municipalities. The MRP is a comprehensive permit that regulates activities related to construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. The permit also requires a public education program, implementing targeted pollutant reduction strategies via green stormwater infrastructure and other stormwater control measures, and a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation.

San Mateo County Environmental Health Department (SMCEHD)

The San Mateo County Environmental Health Department (SMCEHD) was designated by the State Secretary for Environmental Protection as the Certified Unified Program Agency (CUPA)

for San Mateo County in 1996. As the San Mateo County CUPA, SMCEHD implements six State hazardous materials and hazardous waste regulatory management programs: Hazardous Materials Business Plan Program, Hazardous Waste Generator Program, Tiered Permitting Program, Underground Storage Tank Program, California Accidental Release Prevention Program (CALARP) and Aboveground Petroleum Storage Tank Program. Compliance is achieved through routine inspections of regulated facilities, and investigation of citizen-based complaints and inquiries regarding improper handling and/or disposal of hazardous materials and/or hazardous wastes.

San Carlos General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following policies from the General Plan's Environmental Safety and Public Services Element (updated in 2023) are related to hazardous materials.

- **Policy ESPS-5.1:** Prohibit uses involving the manufacturing of hazardous materials throughout the city. Hazardous materials are defined in Chapter 6.95, Section 25501 0-1 of the Health and Safety Code. This policy applies only to the direct manufacture of hazardous substances. It does not apply to the storage or use of such materials in conjunction with permitted commercial and industrial uses.
- **Policy ESPS-5.2:** Require producers of and users of hazardous materials in San Carlos to conform to all local, State, and federal regulations regarding the production, disposal, and transportation of these materials.
- **Policy ESPS-5.3:** Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria, and standards enforcement.
- **Policy ESPS-5.4:** Mitigate indoor air intrusion potential in areas of new development or redevelopment where the property is located above known volatile compound plumes.
- **Policy ESPS-5.5:** Where deemed necessary, based on the history of land use, require site assessment for hazardous and toxic soil contamination prior to approving development project applications.
- **Policy ESPS-5.6:** Require that new development proposals are reviewed for legally required remediation by authorities with jurisdictional authority over groundwater and surface water contamination including but not limited to San Mateo County Environmental Health, State Water Quality Control Board, and the Army Corps of Engineers, where waters of the United States are involved, and collaborate with authorities to ensure all relevant remediation requirements are met.
- **Policy ESPS-5.7:** Prohibit new non-residential uses that are known to release or emit toxic waste at levels that are harmful to human health while continuing to allow life science, research and development, medical, and other necessary services such as dry cleaners.
- **Policy ESPS-5.8:** Require the preparation of emergency response plans as part of use applications for all large generators and users of hazardous waste as required by federal law.
- **Policy ESPS-5.9:** Actively promote public education, research, and information dissemination on hazards materials.
- **Policy ESPS-5.10:** Expand community engagement on remediation. Engage community members in the remediation of toxic sites and the permitting and monitoring of potentially hazardous industrial uses.
- **Policy ESPS-5.11:** Encourage the use of green building practices to reduce potentially hazardous materials in construction materials.

3.9.3 Discussion

Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact with Mitigation Incorporated. Hazardous materials include substances that are flammable, corrosive, explosive, radioactive, infectious, thermally unstable, and poisonous. Operation of the PG&E San Carlos Service Center would continue to involve the routine transport, use, storage, and disposal of hazardous materials associated with vehicle fueling, vehicle CNG fueling, vehicle maintenance and repair, gas and electrical materials storage, treated power pole storage, and more. Project operation would also involve the use of hazardous materials for general cleaning and maintenance purposes, such as cleansers, degreasers, pesticides, and fertilizers. Construction activities at the project site would involve the short-term use of hazardous materials, such as petroleum-based fuels for maintenance and construction equipment, wet concrete and asphalt, paint, and other hazardous construction materials.

Hazardous materials used in routine project operation would be stored throughout the site. Proposed hazardous waste storage areas would be contained such that no contaminated materials are allowed to enter the City's storm and sewer systems, as described below. All hazardous materials drums and containers would be stored off the ground in secondary containment or on pallets.

The new treated pole storage area would contain racks/bins that elevate the treated power poles off the ground to prevent contact with stormwater runoff. The treated pole storage area would be surrounded by a drive-over concrete berm to prevent stormwater runoff or flood waters from traveling through the treated pole storage area. Each treated pole storage bin would be equipped with an automatic cover system that would prevent rainfall from entering the treated pole storage bins and contacting the treated power poles. There would be a slight (0.5%) downward slope (east to west) within the bin storage area and a downward slope (0.9-1.1%) west to east along the side of the bin storage area facing the interior of the project site to direct any runoff into two proposed trench drains, which would then drain into the storm drain system. A new trench drain would be installed along the length of the outdoor gas and electrical materials storage area. A new drive-over concrete berm would surround the perimeter of the gas and electrical materials storage area. The concrete berm would limit the contact of stormwater runoff with storage gas and electrical materials, and the trench drain would collect any runoff in the area and direct the runoff into the storm drain system.

The outdoor Material storage area adjacent to the Material storage building would be fully surrounded along its perimeter with a concrete curb and fully covered by a canopy. These measures would prevent the contact of stormwater with the materials within the Material storage area and thereby prevent the contamination of runoff and flood waters.

The proposed vehicle maintenance garage bays in the Fleet building would not have floor drains/connections to storm drain or sanitary sewer lines, which would prevent the potential flow of contaminants into storm drain lines or the sanitary sewer system. Any spills in the garage bays would be contained and trained staff would use on-site materials and equipment to absorb and properly dispose of any contaminants.

The proposed new generators will require containment dikes surrounding the units with the volume of the containment area being equal to the amount of the fuel capacity of the generator tanks. A special filter drain shall be installed within the containment barrier that allows rainwater to drain from the containment area but does not allow any hazardous fuels/oils/antifreeze to escape the containment area.

Regarding the off-haul of on-site soils during the project construction period, the project LSI determined on-site soil appears to be suitable for on-site reuse as the project would maintain the site's commercial/industrial land use (Terracon 2021, p. 11). Soils exported during future site development will likely need additional testing to satisfy licensed transporter/receiving facility requirements. This testing is a typical practice associated with waste transportation and disposal and is not indicative of a human health or environmental risk at the site (City of San Carlos 2022). Based on the data collected to date, soil that may be destined for export does not appear to meet the characteristics of toxicity and would not be considered a State-regulated waste.

All hazardous substances associated with project operation would be used, transported, stored, and disposed of in conformance with applicable regulations, including:

- The Resource Conservation Recovery Act, which provides the “cradle to grave” regulation of hazardous wastes;
- The Comprehensive Environmental Response, Compensation, and Liability Act, which regulates closed and abandoned hazardous waste sites;
- The Hazardous Materials Transportation Act, which governs hazardous materials transportation on US roadways;
- The International Fire Code, which creates procedures and mechanisms to ensure the safe handling and storage of hazardous materials;
- California Code of Regulations Title 22, which regulates the generation, transportation, treatment, storage, and disposal of hazardous waste; and
- The California Code of Regulations Title 27, which regulates the treatment, storage, and disposal of solid wastes.

Compliance with applicable regulations would ensure that the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Environmental Setting discussion describes PCB contamination along Industrial Road from businesses immediately north of the PG&E Service Center, on the west side of Industrial Road. The monitoring and reporting program concludes that the PCB contamination detected in sediment adjacent to the PG&E Service Center came from these businesses. Additionally, the Limited Site Investigation conducted in 2021 did not detect PCBs in five soil samples collected on site (Terracon Consultants, Inc. 2020). However, the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), a partnership of the City/County Association of Governments (C/CAG) wishes to definitively determine that these businesses are the source of the PCB contaminants and that PG&E Service Center operations are not contributing to them. The San Mateo Countywide Water Pollution Prevention Program wishes to gather soil and stormwater runoff samples from the PG&E Service Center before project construction begins (Lisa Sabin, Managing Scientist, EOA, Inc., Personal communication, May 16, 2024). Therefore, Mitigation Measure HAZ-1 is recommended to ensure coordination between PG&E, the City, and the SMCWPPP to facilitate the collection of these samples. Implementation of Mitigation Measure HAZ-1 reduces this potential impact to less than significant.

Impact HAZ-1: The project site may be contributing to PCB contamination found in adjacent drainages.

Mitigation Measure HAZ-1: Conduct Soil and Stormwater Sampling. Prior to any project construction, PG&E will coordinate with the City and the San Mateo Countywide Water Pollution Prevention Program to allow soil and stormwater runoff samples to be collected on the Service Center property. The sampling will be conducted by the San Mateo Countywide Water Pollution Prevention Program and their agents to ensure required Program sampling protocols are followed. The samples shall be collected before any construction activities begin. The City of San Carlos will facilitate the

coordination with the San Mateo Countywide Water Pollution Prevention Program for scheduling the sample collection.

Should the San Mateo Countywide Water Pollution Prevention Program testing indicate there are PCBs present in on-site soil or stormwater samples above regulatory thresholds, PG&E shall prepare a PCB clean-up and remediation work program to the satisfaction of the Regional Water Quality Control Board, the San Mateo County Health Department, and the San Mateo Countywide Water Pollution Prevention Program, and consistent with all requirements of the Municipal Regional Permit Order No. R2-2022-0018, NPDES Permit No. CAS612008, issued May 11, 2022. All remediation work shall be completed prior to issuance by the City of any building or grading permits.

Effectiveness: This measure would provide further information for the San Mateo Countywide Water Pollution Prevention Program in the detection of potential sources of PCBs in drainage ditch sediment adjacent to the PG&E site.

Implementation: The City shall facilitate the scheduling of the sampling collection with PG&E and the San Mateo Countywide Water Pollution Prevention Program.

Timing: The samples shall be collected prior to any project construction activities.

Monitoring: The City shall ensure this measure is implemented prior to issuing any permits authorizing the start of construction.

This impact would be less than significant with Mitigation Measure HAZ-1 incorporated.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Potential hazards to the public or the environment through the accidental release of hazardous materials into the environment during project construction and operation are discussed below.

Project Construction

Construction activities at the project site would involve the short-term use of hazardous materials, such as petroleum-based fuels for maintenance and construction equipment, wet concrete and asphalt, paint, and other hazardous construction materials. All spills or leaks of petroleum products during construction are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations. All contaminated waste is required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the San Mateo County Environmental Health Department (SMCEHD) would be required throughout the duration of construction. In addition, as described under criterion a), the project LSI determined that, based on data collected to date, on-site soil that may be destined for export do not appear to meet the characteristics of toxicity and would not be considered a regulated waster by State standards (Terracon 2021, p.11). Soil off hauled during grading and excavation would undergo standard testing to determine the appropriate method of disposal. Therefore, substantial hazards to the public or the environment arising from the accidental release of hazardous materials during project construction would not occur.

Project Operation

As discussed above under criterion a), operation of the project would involve the use, storage and/or disposal of hazardous materials associated with operational activities, including vehicle fueling, vehicle and equipment maintenance and repair, cleaning, and landscape maintenance. Although compliance with applicable regulations would make it unlikely, project operation could result in the accidental release of one or more of these materials into the environment.

PG&E, the project applicant, is required to prepare and implement a hazardous materials business plan (HMBP) for hazardous materials routinely used and stored at the site. San Mateo County Health Department is the Certified Unified Program Agency (CUPA) for San Mateo County, including the City of San Carlos, and is responsible for enforcing Chapter 6.95 of the Health and Safety Code. As the CUPA, San Mateo County Health is required to regulate HMBPs and chemical inventory, hazardous waste and tiered permitting, underground storage tanks, and risk-management plans (San Mateo County Health 2024).

The HMBP is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on development sites. The HMBP also contains an emergency response plan, which describes the procedures for mitigating a hazardous release, procedures, and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of the California Emergency Management Agency and other emergency response personnel, such as the San Carlos and Redwood City Fire Department, which serves Redwood City, San Carlos and the unincorporated North Fair Oaks. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts.

PG&E maintains an HMBP for the San Carlos Service Center, dated October 2011 (PG&E 2011). The San Carlos Service Center HMBP contains the following information:

- facility information and business activities;
- business owner/operator identification;
- an emergency response/contingency plan;
- employee training plan;
- guidance for recordkeeping;
- a facility site plan and emergency evacuation map;
- a hazardous materials inventory with chemical descriptions;
- a hazardous waste inventory statement;
- agreements with emergency response agencies;
- an emergency response procedure for hazard mitigation, prevention, and abatement;
- emergency response procedure for earthquake vulnerability;
- forms for hazardous waste generators; and
- facilities inspection checklists.

Furthermore, San Mateo County Health is required to conduct ongoing routine inspections to ensure compliance with existing laws and regulations; to identify safety hazards that could cause or contribute to an accidental spill or release; and to suggest preventative measures to minimize the risk of a spill or release of hazardous substances (San Mateo County Health 2024). Compliance with these regulations and implementation of the PG&E San Carlos Service

Center HMBP would ensure that the risk of accidents and spills is minimized to the maximum extent practicable during the operation of the proposed project. This impact would be less than significant.

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

No Impact. There are no schools within one-quarter mile of the project site. The school closest to the project site is Central Middle School and Arroyo School, both of which are located approximately 0.95 miles south of the project site. No impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact with Mitigation Incorporated. The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (CalEPA 2024). As described under Section 3.9.1 Environmental Setting, the project site is listed in the State Water Board's GeoTracker database for three on-site, closed leaking underground storage tank (LUST) cases. No new hazardous materials sites cases associated with the project site have been listed on the DTSC's EnviroStor database nor the State Water Board's Geotracker database since the completion Phase I ESA (GeoTracker 2024, EnviroStor 2024).

Phase I ESA and Limited Site Investigation

As discussed under this section's Environmental Setting, a Phase I ESA was conducted to characterize potential soil and groundwater contaminants at the site.

The Phase I ESA concluded there are several recognized environmental conditions (RECs) and controlled recognized environmental conditions (CRECs) in connection with the project site. The first REC comprises the long-term industrial operations on site, including automotive repair services, use of solvents, underground hydraulic lifts, an existing waste oil UST, interior floor drains within the fleet services building, wash area, two oil/water separators, and storage of waste transformers, since the mid-1970s. The lack of a subsurface investigation related to these features and the documented solvent use, and the associated potential for undocumented spills or releases to have occurred, represents a REC. The second REC is the limited site access that has prevented observation of portions of the exterior surface conditions. Due to the large quantities of materials storage, dumpsters and hoppers, storage containers, and parked vehicles located throughout the site and the site's long-term industrial operations (~45 years), the lack of observation of exterior surface conditions throughout the site represents a REC. Lastly, the residual concentrations of TPH-DRO and MTBE in soil and TPH-GRO in groundwater that remain in place at the site and the conditional case closures associated with the former USTs and closed LUST cases represent a CREC.

The Phase I ESA recommended further investigation to assess the above-identified RECs. In accordance with SMCDEH requirements, the agency must be notified prior to excavation or development at the site.

As discussed under this sections Environmental Setting, the Limited Site Investigation (LSI) prepared for the project conducted further testing to evaluate selected soil and groundwater samples for the presences or absence of TPH, VOCs, SVOCs, and PCBs per the Phase I ESA recommendations.

The LSI concluded on-site soils appear to be suitable for on-site reuse based on a continued commercial/industrial land use. Soils exported during future site development will likely need

additional testing to satisfy licensed transporter/receiving facility requirements. Based on the data collected to date, soils that may be destined for export do not appear to meet the characteristics of toxicity, and therefore, would not comprise a California regulated waste. Regarding groundwater contamination, Terracon concluded the groundwater results indicate some impacts from organic chemicals that may pose limitations to discharge should dewatering occur as a part of the proposed development. Direct discharge to a municipal separate storm sewer system (MS4) may be unlikely versus discharge to a publicly-owned treatment works (POTW).

Based on the reported concentrations of arsenic in soils and TPH, VOCs, and SVOCs in groundwater, the LSI recommended that a soil and groundwater management plan (SGMP) be prepared and implemented before proposed redevelopment activities commence. The SGMP shall include provisions for notifications to contractors, and subcontractors concerning §5194. Hazard Communication [Cal/OSHA Hazard Communication Regulation]. The LSI also recommended disclosing the soil analytical results to the selected receiving facility that may accept export from the site, should export to a licensed receiving facility become necessary.

To implement the recommendations of the LSI, the project will implement the following mitigation measure:

Impact HAZ-2: The reported concentrations of arsenic in soils and TPH, VOCs, and SVOCs in groundwater on site could pose a significant hazard to contractors and project employees, and the environment.

Mitigation Measure HAZ-2: Prepare Soil and Groundwater Management Plan. Prior to issuing building permits for the proposed project, the City shall require the project Applicant to submit a soil and groundwater management plan (SGMP), prepared by a qualified firm or individual, to the City and the San Mateo County Environmental Health Department (SMCEHD). SMCEHD would be responsible for approving the SGMP. The SGMP shall include provisions for notifications to contractors, and subcontractors concerning §5194. Hazard Communication. The SGMP must include a provision requiring the disclosure of the on-site soil analytical results to the selected receiving facility that may accept exported soil from the site should export to a licensed receiving facility become necessary.

Effectiveness: This measure would require the Applicant to submit a SGMP per the recommendations of the LSI and to satisfy SMCEHD requirements.

Implementation: The Applicant shall be responsible for preparing and submitting the SGMP as part of its building permit application.

Timing: Prior to the issuance of building permits for the proposed redevelopment activities.

Monitoring: The SMCEHD shall verify the SGMP complies with regulatory standards for soil and groundwater management plans.

Implementation of Mitigation Measure HAZ-2 would ensure potential project impacts associated with the reported concentrations of arsenic in soils and TPH, VOCs, and SVOCs in groundwater at the project site do not result in a significant hazard to the public or the environment. This impact would be less than significant with the incorporation of Mitigation Measure HAZ-2.

Asbestos, Lead-Based Paint, and Polychlorinated Biphenyls

A significant hazard to the public or environment may occur if existing on-site structures that potentially contain asbestos, lead-based paint, or polychlorinated biphenyls are disturbed during demolition activities and appropriate health and safety protocols demolition activities and removal of asbestos-, lead-, and PCB-containing materials are not implemented. The project is

required to complete an asbestos and lead-based paint survey per Cal/OSHA requirements, and a PCB for managing demolition materials and wastes during building demolition activities per RWQCB MRP requirements. While it is standard protocol to test for and remediate any asbestos-containing materials and lead-based paint prior to demolition activities, the existing on-site buildings proposed for demolition have not been evaluated for potential asbestos-containing materials (ACMs) and lead-based paint (LBP) and, therefore, a survey is needed to determine the presence of ACMs and LBP prior to the proposed demolition activities and whether remediation for ACMs and LBP is required.

Per the MRP, PCBs can enter storm drains during and/or after building demolition through vehicle track-out, airborne releases, soil erosion, or stormwater runoff. The MRP requires the implementation of a protocol to manage PCBs during building demolition for structures containing building materials with PCBs concentrations of 50 ppm or greater at the time such structures undergo demolition. Applicable structures include, at a minimum, commercial, public, institutional, and industrial structures constructed or remodeled between the years 1950 and 1980. The existing on-site buildings proposed for demolition include industrial structures that were constructed in the mid-1970s and have not yet been evaluated for PCB-containing materials.

Mitigation Measure HAZ-3 is included below to ensure ACMs, LBP, and PCBs, if present on site, do not cause a significant hazard to the public or the environment.

Impact HAZ-3: The existing on-site buildings have not been evaluated for ACMs, LBP, or PCBs, the presence of which could pose a significant hazard to contractors during proposed demolition activities.

Mitigation Measure HAZ-3: Conduct Asbestos, Lead-Based Paint, and Polychlorinated Biphenyls Surveys. Prior to issuing demolition and building permits for the proposed project, the City and San Mateo County Health shall require the project Applicant to conduct and submit a visual inspection/pre-demolition survey, and possible sampling, prior to the demolition of on-site buildings to determine the presence of ACMs, LBP, and PCBs. The following describes the type of testing that will be conducted at the site, consistent with existing regulations.

A visual inspection/pre-demolition survey, and possible sampling, will be conducted prior to the demolition of on-site buildings to determine the presence of ACMs and lead-based paint LBP.

- During demolition activities, all building materials containing lead-based paint would be removed in accordance with Cal/OSHA Lead in Title 8, California Code of Regulations (CCR), Section 1532.1, including employee training, employee air monitoring, and dust control. Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the type of lead being disposed.
- All potentially friable asbestos containing materials (ACMs) would be removed in accordance with National Emission Standards for Air Pollution (NESHAP) guidelines prior to demolition or renovation activities that may disturb ACMs. All demolition activities would be undertaken in accordance with Cal/OSHA standards contained in Title 8, CCR, Section 1529, to protect workers from asbestos exposure.
- Materials containing more than one-percent asbestos would also be subject to BAAQMD regulations. Removal of materials containing more than one-percent asbestos would be required to be completed in accordance with BAAQMD requirements and notifications.

- Based on Cal/OSHA rules and regulations, the following conditions would be required to limit impacts to construction workers.
 - Prior to commencement of demolition activities, a building survey, including sampling and testing, would be completed to identify and quantify building materials containing lead-based paint.
 - During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR, Section 1532.1, including employee training, employee air monitoring and dust control.
 - Any debris or soil containing lead-based paint or coatings would be disposed of at landfills that meet acceptance criteria for the type of waste being disposed.

A protocol will be implemented for managing PCB-containing materials and waste during building demolition so that PCBs do not enter municipal separate storm sewer systems (MS4s). This protocol shall adhere to U.S. EPA guidelines for determining the presence of manufactured PCB products in buildings or other structures and conducting abatement efforts. This protocol shall be implemented consistent with MRP 3 (Orders No. R2-2022-0018 and R2-2023-0019) Provision C.12.g (Manage PCB-Containing Materials and Wastes During Building Demolition Activities). The protocol shall, at a minimum, include the following measures:

- Prior to issuing a demolition and building permit(s) for the project, the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), as the designated MRP Permittee, shall coordinate with the project proponent and demolition contractor to test all structures proposed for demolition for the presence of building materials containing PCBs.
- For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater, the SMCWPPP shall require the demolition contractor to provide notification to the SMCWPPP, the Water Board, and U.S. EPA at least one week before any demolition is to occur.
- For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater, the SMCWPPP shall verify that PCBs in demolished buildings are properly managed to minimize transport to the MS4 by obtaining official documentation that the building materials with PCBs concentrations of 50 ppm or greater in these demolished applicable structures were disposed appropriately according to state and federal regulations. Verification shall involve inspecting demolition sites monthly during demolition activities in the dry season (May – September) and requiring the demolition contractors to sweep the project sites and the streets around the property with street sweepers that will effectively remove sediment and dust.

Effectiveness: This measure would ensure that all regulations pertaining to the disposal of ACMs, LBP, and PCBs and Cal/OSHA and MRP requirements are met.

Implementation: The Applicant shall be responsible for preparing and submitting the ACMs/LBP visual inspection/pre-demolition survey, and possible sampling, and any subsequently required remediation plans as part of its building permit application. The Applicant shall, in coordination with the SMCWPPP, be responsible for preparing and submitting the PCBs pre-demolition survey and

testing results, and any subsequently required remediation plans as part of its building permit application.

Timing: Prior to the issuance of demolition and building permits for the proposed redevelopment activities.

Monitoring: San Mateo County Health shall verify the visual inspection/pre-demolition survey, and possible sampling, and any subsequently required remediation plans comply with Cal/OSHA regulatory standards for ACM and LBP surveying, testing, and remediation. The SMCWPPP shall provide in its Annual Report to the San Francisco Bay Regional Water Quality Control Board the following: whether the project site was inspected during demolition and, if there are building materials with PCBs concentrations of 50 ppm or greater, the hazardous waste manifest prepared for transportation of the material to a disposal facility. Verification of the latter requirement may include the hazardous waste manifest prepared for transportation of the material to a disposal facility.

Project compliance with existing regulations per Mitigation Measure HAZ-3 would ensure potential ACMs, LBP, and PCBs that may occur in buildings on site would not present a significant hazard to the public or the environment. This impact would be less than significant with the incorporated of Mitigation Measure HAZ-3.

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

Less Than Significant Impact. The San Carlos Airport, located approximately 0.34 miles southeast of the project site, is a general-aviation airport. The project is located in the San Carlos Airport Land Use Compatibility Plan (ALUCP) area (C/CAG 2015). According to the ALUCP, the project site is not within a primary flight path, but is within Zone 6, the traffic pattern zone. While the project site's existing land use, a utility company service center, is not listed as a land use category in the ALUCP Table 4-4 Safety Compatibility Criteria, occupancies utilizing hazardous materials, storage of hazardous materials (gas stations, etc.), warehouses and distribution facilities, and repair garages not use of flammable objects are identified as compatible land uses in this zone. Under the ALUCP, the project site has an allowable height of 155 feet above mean sea level (MSL).

The tallest of the proposed buildings, the Fleet building, would have a height of 32 feet above MSL, well below the allowable height of 155 feet. Accordingly, the proposed project would not subject people working in the project building or structures to substantial safety hazards or excessive noise and the proposed building would not create a hazard to air navigation. This impact would be less than significant.

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

No Impact. The City of San Carlos has established emergency preparedness procedures to respond to a variety of natural and man-made disasters that could affect the community. In the event of an emergency, the City would respond according to the Standardized Emergency Management System (SEMS) developed by the State. The SEMS system establishes a hierarchy of response, with local government as the first responders. If San Carlos does not have sufficient resources to respond to a disaster, the County of San Mateo would lend resources. San Carlos established an Emergency Operations Center program in 1987. San Mateo County Sheriff's Office of Emergency Services (OES) is responsible for coordinating

emergency response in the county. The OES operates under a Joint Powers Agreement with the 20 incorporated cities in the county (San Mateo County OES 2014).

The proposed project would not interfere with the City's emergency response plan or emergency evacuation plan. The proposed project would not block roads and would not impede emergency access to surrounding properties or neighborhoods. The project would follow all of the City's construction best management practices, which, among other standards, require vehicle parking and storage to occur in a designated, on-site area. The project plans include plans for emergency vehicle access (Figure 12 – Fire Access Plan). The site's internal circulation lanes would serve as fire and emergency vehicle access lanes. These lanes vary from a minimum of 20 feet wide to a maximum of 40 feet wide and would provide access to all areas of the project site, including the Operations building, Logistics Warehouse & Shops building, and Fleet building. No impact would occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The project site is developed with the existing San Carlos PG&E Service Center. The site is surrounded by built-out urban uses and is not mapped in a Fire Hazard Severity Zone by the California Department of Forestry and Fire Prevention (CAL FIRE) (CAL FIRE 2023). The proposed project would not subject people or structures to wildfire hazards. No impact would occur.

3.9.4 References

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- Terracon Consultants, Inc. (Terracon). 2020. Phase I Environmental Site Assessment, PG&E San Carlos Service Center, 275 Industrial Road, San Carlos, San Mateo County, California. October 29, 2020.
- _____. 2021. Limited Site Investigation, PG&E San Carlos Service Center, 275 Industrial Road, San Carlos, San Mateo County, California. May 14, 2021.

Personal Communication

Lisa Sabin, Managing Scientist, EOA, Inc., Personal communication, May 16, 2024.

3.10 HYDROLOGY AND WATER QUALITY

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

3.10.1 Environmental Setting

Site topography is relatively flat with approximately 2 feet of relief between the highest and lowest points of the site (Terracon Consultants 2020). Elevations of the project site are primarily 9 to 10 above mean sea level (MSL).

Groundwater monitoring wells at this site indicate groundwater at depths as shallow as 1.5 feet below ground surface (bgs). Groundwater flow direction was reported to the southwest to northeast and varied seasonally and due to tidal influences (Terracon 2020).

The project site is in the watershed of Steinberger Slough, downstream of both the Belmont Creek and Pulgas Creek watersheds (Tillery 2007). The project site is bordered on three sides (the northwest, east, and southeast) by engineered, natural bottom drainage ditches that collect stormwater from San Carlos, and empty into Phelps Slough approximately 0.34 miles east of

the project site. Phelps Slough enters a lagoon before being released to Steinberger Slough through a tide gate. During a March 21, 2024 site visit conducted by the City, flooding was observed on the project site.

The City of San Carlos and the project site are located within the Santa Clara Valley Groundwater Basin, San Mateo Plain Sub-basin, as identified by the San Francisco Regional Water Quality Control Board (RWQCB).

The project site is located within flood zones AE and Zone X, as mapped by the Federal Emergency Management Agency (FEMA). Zone AE corresponds to a high-risk flood area with at least a 1 percent annual chance of flooding with a base flood elevation (BFE) of 10 feet (FEMA 2019). Zone X corresponds to areas subject to the 1% annual chance flood with average depth of less than one foot or with drainage areas of less than one square mile.

As described in Project Description, floodwaters that enter the site typically originate from Belmont Creek, which is located approximately 0.25-miles northwest of the project site's northern property line. During storm events, floodwaters from Belmont Creek historically have overtopped the top of creek bank and traveled to the project site via the drainage ditches described previously and via Industrial Road. During 10-year storm events, there is no on-site ponding of floodwaters. During 100-year storm events, water ponds on site in low-lying areas to a depth of around one (1) foot at the CNG fueling station, the northernmost parking lot, the parking lot immediately northwest of the Operations Building, the outdoor materials storage area along the eastern property line (i.e., the future location of the Logistics Warehouse and Shops Building), and several locations along the southern property line near the southern corner of the property. The existing Operations building is set at least 2 feet above the Federal Emergency Management Agency (FEMA) base flood elevation (BFE) level. Existing on-site flooding during 100-year storm events is shown in Figure 4 – Flooding During 100-Year Storm - Existing Conditions.

According to the San Mateo County Flood and Sea Level Rise Resiliency District's ("OneShoreline"), OneShoreline Bayside Map of Future Conditions, the project site is located in the Sea Level Rise Overlay District and the Shallow Groundwater Rise Overlay District (OneShoreline 2024). Project site proximity to rising groundwater levels may impact flooding extents and depth on the site in the future.

3.10.2 Regulatory Setting

In addition to CEQA, other federal and state laws apply to the hydrology and water quality associated with the proposed project. Each of these laws is identified and discussed below

Federal Regulations

Federal Clean Water Act

The Clean Water Act (CWA) is the primary federal legislation governing water quality and forms the basis for several state and local laws throughout the nation. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Important and applicable sections of the Act are:

- Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), which is a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the U.S. In California, this permit program is administered by the RWQCBs, and is discussed in detail below.

National Pollutant Discharge Elimination System

The CWA has nationally regulated the discharge of pollutants to the waters of the U.S. from any point source since 1972. In 1987, amendments to the CWA added Section 402(p), which established a framework for regulating nonpoint source storm water discharges under the NPDES. The NPDES General Construction Permit (GCP) requirements apply to clearing, grading, and disturbances to the ground such as excavation. Construction activities on one or more acres are subject to a series of permitting requirements contained in the NPDES GCP. The GCP includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

The GCP requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that includes Best Management Practices (BMPs) to be implemented during Project construction. The project sponsor is also required to submit a Notice of Intent (NOI) with the State Water Resources Control Board Division of Water Quality. The NOI includes general information on the types of construction activities that would occur on the site.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

State Regulations

Porter-Cologne Water Quality Control Act

The State's Porter-Cologne Water Quality Control Act, as revised in December 2007 (California Water Code Sections 13000-14290), provides for protection of the quality of all waters in the State of California for use and enjoyment by the people of California. It further provides that all activities that may affect the quality of waters of the state shall be regulated to obtain the highest water quality that is reasonable, considering all demands being made and to be made on those waters. The Act also establishes provisions for a statewide program for the control of water quality, recognizing that waters of the state are increasingly influenced by interbasin water development projects and other statewide considerations, and that factors such as precipitation, topography, population, recreation, agriculture, industry, and economic development vary regionally within the State. The statewide program for water quality control is, therefore, administered most effectively on a local level with statewide oversight. Within this framework, the Act authorizes the State Water Resources Control Board and RWQCBs to oversee the coordination and control of water quality within California.

State Water Resources Control Board

Created by the California State Legislature in 1967, the State Water Resources Control Board holds authority over water resources allocation and water quality protection within the State. The five-member State Water Resources Control Board allocates water rights, adjudicates water right

disputes, develops statewide water protection plans, establishes water quality standards, and guides the nine RWQCBs. The mission of the State Water Resources Control Board is to, “preserve, enhance, and restore the quality of California’s water resources, and ensure their proper allocation and efficient use for the benefit of present and future generations.”

San Francisco Bay Regional Water Quality Control Board

The City of San Carlos is under the jurisdiction of the San Francisco Bay RWQCB. As mentioned above, activities that disturb one or more acres of soil (including all construction disturbance) are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling or excavation, but does not include regular maintenance activities. The Construction General Permit requires the development and implementation of a SWPPP. The SWPPP must list BMPs the discharger will use to protect storm water runoff and the placement of those BMPs. Furthermore, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit describes the elements that must be contained in a SWPPP.

Local Regulations

San Mateo Countywide Water Pollution Control Prevention Program

The City of San Carlos participates in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System (NPDES) permit. The Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act require that large urban areas discharging stormwater into the San Francisco Bay or the Pacific Ocean have an NPDES permit to prevent harmful pollutants from being dumped or washed by stormwater runoff, into the stormwater system, then discharged into local waterbodies.

The Municipal Regional Permit (MRP) outlines the State's requirements for municipal agencies in San Mateo County to address the water quality and flow-related impacts of stormwater runoff. Some of these requirements are implemented directly by municipalities while others are addressed by the SMCWPPP on behalf of all the municipalities. This is a comprehensive permit that requires activities related to construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. The permit also requires a public education program, implementing targeted pollutant reduction strategies, and a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation.

The Municipal Regional Stormwater NPDES Permit (MRP) issued by the San Francisco Bay RWQCB (Orders No. R2-2022-0018 and R2-2023-0019) for San Mateo County includes the City of San Carlos under its coverage. Under Provision C.3 of the MRP, new development and redevelopment projects are required to implement appropriate source control, site design, and stormwater treatment measures. The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is a partnership of each incorporated city and town within San Mateo County, San Mateo County, and the C/CAG, which all share the MRP. The SMCWPPP requires submittal of the C.3 and C.6 Development Review Checklist for new development and redevelopment projects to ensure that the appropriate construction best management practices (BMPs), source control measures, low impact development (LID) site design measures, and stormwater treatment measures will be implemented.

San Carlos Municipal Code

Chapter 13.14 of the San Carlos Municipal Code, Stormwater Management and Discharge Control, establishes requirements to protect and enhance the water quality of the City's watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the Clean Water Act. Chapter 13.14 enforces the tenets of the Clean Water Act by:

1. Eliminating non-stormwater discharges to the municipal separate storm sewer;
2. Controlling the discharge to municipal separate storm sewers from spills, dumping or disposal of materials other than stormwater;
3. Reducing pollutants in stormwater discharges to the maximum extent practicable.

Chapter 13.14 sets minimum standards for the reduction of pollutants in stormwater; these requirements include standards for parking lots and similar structures, best management practices for new developments and redevelopments, and compliance with best management practices guidelines or requirements that have been adopted by the City for a specific activity, operation, or facility.

Section 13.14.120 Watercourse Protection requires property owners through which a watercourse passes to keep and maintain that part of the watercourse within the property that is not under easement reasonably free of trash, debris, excessive vegetation and other obstacles which would pollute, contaminate or significantly retard the flow of water through the watercourse; maintain existing privately owned structures within a watercourse so that structures will not become a hazard to the use, function or physical integrity of the watercourse; and not remove healthy bank vegetation beyond that actually necessary for maintenance, nor remove vegetation in such a manner as to increase the vulnerability of the watercourse to erosion.

Chapter 15.56 of the San Carlos Municipal Code sets forth construction requirements for development that would minimize flood hazard risks, including anchoring, elevation, and flood-proofing, and standards for utilities, subdivisions, residential, and non-residential construction. Non-residential structures can either be elevated above the base flood elevation or be floodproofed below the base flood level. Compliance with Section 15.56.120 requires a development permit approval from the Floodplain Administrator for the City of San Carlos (i.e., the Building Official) that provides plans drawn to scale showing the nature, location, dimensions, and elevation of the area in question; the location and elevation of existing or proposed structures, fill, storage of material, and drainage facilities; and floodproofing provisions.

San Carlos 2030 General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following policies from the General Plan's Environmental Management Element are relevant to hydrology and water quality.

- **Policy EM-5.1:** Reduce the discharge of toxic materials into the city's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).
- **Policy EM-5.2:** Promote the use of less toxic household and commercial cleaning materials.
- **Policy EM-5.3:** Promote the conservation and efficient use of water in new and existing residences and by commercial and industrial consumers.
- **Policy EM-5.5:** Recycled water distribution system (purple pipe) should be used for landscaping and other non-potable water uses for residential, commercial and industrial customers, where technically and financially feasible.

- **Policy EM-5.7:** Encourage site designs that manage the quantity and quality of storm water run-off.
- **Policy EM-5.10:** Require the evaluation of potential groundwater depletion that could occur from new development through dewatering.

3.10.3 Discussion

Would the project:

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

Less Than Significant Impact. Potential impacts to water quality during the construction and operation phases of the proposed project are discussed below.

Project Construction

Demolition, excavation, pavement removal, grading, and other construction activities associated with the proposed project have the potential to impact water quality through increasing the amount of silt, debris, and pollutants carried in stormwater runoff. The use of fuels, solvents, paints, and other types of hazardous materials during construction may present a risk to surface water quality through inadvertent spills. The refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system and/or drainage ditches surrounding three sides of the project site.

To minimize these potential impacts, the proposed project would be required to comply with the NPDES GCP and a SWPPP that requires the incorporated of BMPs to control sedimentation, erosion, and hazardous materials contamination of stormwater runoff during construction. The State Water Board mandates that projects that disturb one or more acres must obtain coverage under the Statewide GCP. The project would disturb over one acre of the 18.39-acre site to construct new buildings and structures, replace pavements, and install flow-through planters and bioretention basins. Therefore, the project would be subject to these requirements.

The applicant is required to comply with C.6 provisions of the MRP – Construction Stormwater and attach the San Mateo Countywide SWPPP's construction best management practices plan sheet to project plans. The project contractor would be required to implement the applicable BMPs identified on the plan set sheet containing the San Mateo Countywide SWPPP's construction best management practices plan. The project Applicant, PG&E, maintains its own list of BMPs to minimize contact of potential pollutants with stormwater, discharges of pollutants to storm drains or surface water, and the contamination of soils at all construction sites. These BMPs are contained within the PG&E Good Housekeeping Activity Specific Erosion and Sediment Control Plan (A-ESCP). PG&E's Good Housekeeping BMPs apply to all PG&E projects, and all PG&E project teams, crews, and subcontractors are required to be familiar with and implement measures contained within the Good Housekeeping Plan (PG&E Construction Stormwater Group 2017).

The project must comply with the City of San Carlos' existing regulatory requirements, including Chapter 13.14, Stormwater Management and Discharge Control, which is intended to reduce pollutants in stormwater discharges to the maximum extent practicable.

Adherence to applicable water quality regulations, including the active implementation of construction stormwater BMPs, implementation of construction BMPs contained within PG&E's Good Housekeeping Plan, and the compliance with the City of San Carlos Municipal Code would ensure that water quality standards are not violated during construction. Therefore, potential impacts to water quality during project construction would be less than significant.

Project Operation

The proposed project would result in a net decrease in the amount of impervious surface area at the project site compared to existing conditions. The existing project site consists of approximately 16.2 acres (705,545 sq. ft.), or 88 percent of the site, of impervious surface area (buildings and paved parking lots and outdoor materials storage areas). The proposed project includes approximately 15.6 acres (680,233 sq. ft.) of impervious surface area, and approximately 2.58 acres (112,578 sq. ft.) of pervious surface area (BKF 2023a). As such, the project would decrease the amount of impervious surface area, or increase the amount of pervious area, at the site by approximately 0.58 acres (25,312 sq. ft.) compared to existing conditions. This decrease in impervious surface area would be a result of the new landscaped areas.

Although an increase in the amount of pervious area provided at the project site would reduce the amount of stormwater runoff from the site, the proposed project could still impact water quality during the operational phase of the project. Runoff from industrial properties and roadways typically contain oils, grease, fuel, antifreeze, by products of combustion (such as lead, cadmium, nickel, and other metals), as well as fertilizers, herbicides, pesticides, and other pollutants. Precipitation at the beginning of the rainy season may result in initial stormwater runoff (first flush) with high pollutant concentrations.

Stormwater runoff water quality is regulated locally by the SMCWPPP, which includes the C.3 provisions set by the San Francisco Bay RWQCB's MRP. The MRP was reissued in 2022/2023 and includes stricter requirements for incorporating post-construction stormwater control/LID measures into new development and redevelopment projects. Because the proposed project would replace 10,000 square feet or more of impervious surface, it is considered a "regulated project." To comply with Provision C.3 of the MRP, the project would be required to include appropriate source control, site design, and storm water treatment measures to address both soluble and insoluble storm water runoff pollutant discharges and prevent increases in runoff flows. Project elements that address C.3 provisions include, but are not limited to:

- Marking on-site inlets with the words "No Dumping! Flows to Bay" or equivalent.
- Plumbing interior floor drains to sanitary sewer.
- Retaining existing vegetation as practicable.
- Selecting diverse species appropriate to the site.
- Including plants that are pest and/or disease-resistant, drought-tolerant, and/or attract beneficial insects.
- Minimizing use of pesticides and quick-release fertilizers.
- Using an efficient irrigation system designed to minimize runoff.
- Providing a sink or other area for equipment cleaning, which is:
 - Connected to a grease interceptor prior to sanitary sewer discharge.
 - Large enough for the largest mat or piece of equipment to be cleaned.
 - Indoors or in an outdoor roofed area designed to prevent stormwater run-on and run-off, and signed to require equipment washing in this area.
- Providing a roofed and enclosed area for dumpsters, recycling containers, etc., designed to prevent stormwater run-on and runoff.
- Connecting any drains in or beneath dumpsters, compactors, and tallow bin areas serving food service facilities to the sanitary sewer.
- Performing process activities either indoors or in roofed outdoor area, designed to prevent stormwater run-on and runoff, and to drain to the sanitary sewer.
- Covering or designing outdoor equipment/materials storage areas to avoid pollutant contact with stormwater runoff.
- Locating outdoor equipment/materials storage areas only on paved and contained areas.

- Roofing storage areas that will contain non-hazardous liquids.
- Designating a vehicle/equipment repair/maintenance area indoors, or an outdoors area designed to prevent stormwater run-on and runoff and provide secondary containment.
- Not installing drains in the secondary containment areas.
- Not installing floor drains unless pretreated prior to discharge to the sanitary sewer.
- Connecting containers or sinks used for parts cleaning to the sanitary sewer.
- Designing fire sprinkler systems for discharge of fire sprinkler test water to landscape or sanitary sewer.
- Directing roof runoff to vegetated areas.
- Directing roof runoff from sidewalks, walkways and/or patios to vegetated areas.
- Directing runoff from driveways and/or uncovered parking lots onto vegetated areas.
- Limiting disturbance of natural water bodies and drainage systems; minimizing compaction of highly permeable soils; protecting slopes and channels; and minimizing impacts from stormwater and urban runoff on the biological integrity of natural drainage systems and water bodies.
- Minimizing impervious surfaces.

The proposed project would comply with applicable C.3 provisions and has proportioned the site into four Drainage Management Areas (DMAs) as shown in Sheet C8.00 of the plan set (dated 7/19/2024). These DMAs would generally direct stormwater runoff to planters and bioretention areas around the new Logistics Warehouse & Shops building and Fleet building, adjacent to the Operations building, and in the southern corner of the project site where water would flow through vegetation before reaching outfalls that convey the runoff into the surrounding drainage ditches. Stormwater runoff would be prevented from entering the treated pole storage area and outdoor gas and electrical materials storage areas using concrete berms that surround the perimeters of these areas. The treated pole storage bins would have automatic covers that would prevent stormwater from contacting the treated power poles, and the treated pole storage bins would be lifted off the ground. The Material storage area would have a concrete curb along its perimeter and would be covered by a canopy structure to prevent stormwater from entering this area. Stormwater runoff directed away from the treated pole storage area, gas and electrical materials storage area, and Material storage area would be collected in trench drains and conveyed to existing storm drain lines.

The project is also required to protect the water quality of the watercourses (i.e., the drainage ditches) around the property that do not have an easement per San Carlos Municipal Code Section 13.14.120 Watercourse Protection. As such, the property owner, PG&E, is required to keep and maintain the portions of the drainage ditches that are not under easement reasonably free of trash, debris, excessive vegetation and other obstacles that would affect the water quality of the drainage ditches.

The project is not required to prepare an Industrial Facility SWPPP, which allows permitted industrial facilities to discharge clean stormwater to surface waters, because the San Carlos Service Center does not require coverage under the NPDES Industrial General Permit (IGP).

Project conformance with NPDES permit and San Carlos Municipal Code requirements and required permit approvals by the City of San Carlos, would ensure that implementation of the proposed project would result in a less-than-significant impact to water quality.

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

Less than Significant Impact. Construction of the proposed project may involve dewatering of the site to excavate and construct the new building foundations. Although groundwater in

proximity of the excavation areas may also lower slightly during construction activities, the project would not construct any subterranean structures (e.g., a subterranean parking garage) and, therefore, any reduction in groundwater would not be substantial. Once constructed, the proposed project would increase the amount of permeable space at the project site by approximately 0.58 acres (25,312 sq. ft.) and add stormwater retention features that would facilitate the percolation of collected stormwater. Therefore, the proposed project would not interfere with groundwater recharge.

Implementation of the proposed project would result in an increase in water demand compared to existing conditions. However, groundwater is not used for municipal supply in San Carlos. The Mid-Peninsula Water District (MPWD) would provide potable water for the proposed project. MPWD does not use groundwater supplies to meet demand. Since the proposed project would not develop or increase the use of groundwater supplies, implementation of the project would not impact groundwater supplies. Further, the project would increase the amount of pervious area at the site and allow for greater groundwater recharge at the site compared to existing conditions. This impact would be less than significant.

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

i) Result in substantial erosion or siltation on- or off-site;

Less Than Significant Impact. The project would not substantially alter the drainage pattern of the project site (BKF Engineers 2023a). Currently, the site's existing drainage patterns direct stormwater from the interior of the site to the engineered drainage ditches surrounding three sides of the project site. Under the proposed project, stormwater would be directed to on-site stormwater retention features and then to the outfalls that discharge into the drainage ditches. Stormwater run-off from the site would be directed to a series of DMAs/bioretention areas that allow for the cleansing and infiltration of stormwater before reaching the outfalls. In the treated pole storage area and outdoor gas and electrical materials storage area, source control and site design measures would be implemented to prevent pollutants from entering stormwater and help retain storm water on site for treatment prior to discharge to the storm drain system. In the covered materials storage building area, stormwater runoff would be collected by trench drains and conveyed directly into the storm drain system. The project would feature planters for stormwater treatment surrounding the Logistics Warehouse & Shops building and Fleet building and bioretention areas adjacent to the Operations building and in the southern corner of the project site, but also on the eastern, southern, and western project site perimeters (see Figure 14 – Stormwater Control Plan). The project would also require the installation of new 6" storm drain pipes north of the Fleet building and 4" storm drain pipes south/southwest of the Fleet building, and storm drain inlets north and east of the Operations building and east of the Logistics Warehouse & Shops building. The project would result in an increase of pervious surface area from landscaping at the project site.

The proposed project would not cause erosion or siltation over the long term because the project site would be covered with existing and new buildings, existing and new paved areas, and landscaping. No bare soil would be present. However, project construction would require grading and soil exposure that could result in temporary erosion and/or siltation if not controlled. As stated previously, the project would be required to comply with existing regulations and implement BMPs to prevent erosion and siltation. Compliance with these provisions would prevent erosion and siltation on- or off-site during construction activities. This impact would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;

Less Than Significant Impact (Responses ii) and iii)). The project would not alter the existing drainage pattern of the site. While the project would add new buildings and bioretention areas and flow-through planters for on-site stormwater retention and treatment, the pre- and post-drainage patterns would remain the same (BKF Engineers 2023a). The project would not add new impervious surfaces; the project would reduce impervious surface area at the site by approximately 0.58 acres compared to existing conditions. The project includes source control and site design measures to prevent pollutants from entering stormwater and help retain storm water on site for treatment prior to discharge to the storm drain system.

As described in Section 3.9, Hazards and Hazardous Materials, the treated pole storage area and gas and electrical materials storage area have been designed to limit the contact of stormwater runoff and flood waters with the treated power poles and gas and electrical materials and direct runoff and flood waters away from these areas and into trench drains.

A flood evaluation was prepared for the proposed project (BKF Engineers, “275 Industrial Road – Belmont Creek Flood Evaluation,” October 18, 2023) (BKF Engineers 2023b) (see Appendix E). The flood evaluation assessed the potential flood impacts of the proposed project in terms of water surface elevation (WSE) differentials and flooding extents between existing and proposed conditions. The flood evaluation determined the extents of localized offsite ponding near the project site between existing and proposed conditions is comparable. Offsite ponding along Industrial Road and the three drainage ditches surrounding the project site do not show significant difference between existing and proposed conditions (BKF Engineers 2023b, pp. 5-6). There would be new ponding onsite due to the volume of flood water that would be displaced by the proposed buildings, specifically the Logistics Warehouse and Shops building. During a 100-year flood, under existing conditions water ponds onsite in a low-lying area to a depth of around one (1) foot at the future location of the Logistics Warehouse & Shops building. The proposed Logistics Warehouse & Shops building would displace the water that currently ponds, resulting in moderate ponding increases onsite. 100-year flood water surface elevation increases onsite under proposed conditions would amount to less than 0.5 feet in the areas surrounding the Logistics Warehouse and Shops building.

The flood evaluation compared two (2) downstream hydraulic boundary conditions, (i) FEMA WSE and (ii) FEMA WSE + 6 FT. The second boundary condition (FEMA WSE + 6 FT) considers the potential impacts of 6 feet of projected sea level rise on project-induced flooding. The modeling showed minor WSE differences onsite for the project. In general, the higher boundary condition (FEMA WSE + 6 FT) results in WSE increases as high as 0.3 feet onsite during the 100-year storm. Additionally, the higher boundary condition causes a slightly larger area of inundation south of the Logistics Warehouse and Shops building.

The flood evaluation concluded the proposed project would not result in significant offsite flooding impacts, and the increase in on-site 100-year flooding would be less than 0.5 feet (BKF Engineers 2023b, p. 6). While the project would continue to cause flooding onsite, increases in on-site flooding would not differ substantially compared to existing conditions. Project flooding under proposed conditions is shown in Figure 15 – Floodwater Overlay Plan.

The project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff. This impact would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is located with FEMA flood zone AE, which is a SFHA subject to inundation by the 100-year flood with a base flood elevation of approximately 10 feet and Zone X, which is a zone subject to the 1% annual chance flood with average depth of less than one foot or with drainage areas of less than one square mile (FEMA 2019). The project site experiences overland flooding in its existing condition. During 100-year storm events, water ponds on site in low-lying areas to a depth of around one (1) foot at the CNG fueling station, the northernmost parking lot, the parking lot immediately northwest of the Operations Building, the outdoor materials storage area along the eastern property line (i.e., the future location of the Logistics Warehouse and Shops Building), and several locations along the southern property line near the southern corner of the property. In addition, the San Mateo County Multijurisdictional Local Hazard Mitigation Plan (2021) and the San Carlos General Plan Safety Element present maps showing much of the area between Highway 101 and State Route 82 (El Camino Real), including the project site, as being impacted by flooding under future sea level rise scenarios.

Construction within SFHAs is governed by the City's Municipal Code Chapter 15.56 (Flood Damage Prevention). Section 15.56.080 requires a development permit to be obtained before construction begins in a SFHA. City building permits serve as the vehicles for permitting development in the floodplain. Municipal Code Section 15.56.120 sets forth construction requirements for development that would minimize flood hazard risks, including anchoring, elevation, and flood-proofing, and standards for utilities, subdivisions, residential, and non-residential construction. Non-residential structures can either be elevated above the base flood elevation or be floodproofed below the base flood level. Compliance with Section 15.56.120 would require the approval of a development permit from the Floodplain Administrator for the City of San Carlos (i.e., the Building Official) which provides plans drawn to scale showing the nature, location, dimensions, and elevation of the area in question; the location and elevation of existing or proposed structures, fill, storage of material, and drainage facilities; and floodproofing provisions. Specifically, the following information is required:

- Proposed elevation, in relation to mean sea level, of the lowest floor (including basement) of all structures.
- Proposed elevation in relation to mean sea level to which any structure shall be floodproofed. Floodproofing requires the structure to be watertight with walls substantially impermeable to the passage of water below the base flood level and have structural components capable of resisting hydrostatic and hydrodynamic loads and effects of buoyancy.
- All appropriate elevation and floodproofing certifications as listed in Section 15.56.100(D) of the San Carlos Municipal Code.

Approximately 175,951 sq. ft. of the surface of the site would be dedicated to building coverage; approximately 112,578 sq. ft. square feet would be landscaping; and the remaining area would be for parking lots, driveways, sidewalks, paths, and roads. The new Logistics Warehouse & Shops building, Fleet building, and Material Storage building would be raised one foot above the BFE (including sea level rise projections) levels. The existing Operations building is raised at least 2 feet above BFE.

Compliance with the City's Municipal Code Chapter 15.56 (Flood Damage Prevention) would result in flood water being diverted around the project buildings (175,951 sq. ft.) resulting in the redirection of flood waters. As described under the response to criterion b), the proposed project would increase the amount of pervious area at the project site, which would allow for a greater amount of water to percolate into the ground than under existing conditions. As described under the response to criteria c(ii) and c(iii), the project flood evaluation determined that under 100-year flood conditions plus 6 feet of sea level rise (FEMA WSE + 6 FT), the new Logistics Warehouse & Shop building would displace flood waters that would normally pond in the

location of the new building and result in moderate increases in ponding. However, the increase in flood water surface elevations onsite surrounding the Logistics Warehouse & Shops building under proposed conditions would amount to less than 0.5 feet and the project would not result in increases in flooding offsite.

Therefore, while the project would redirect flood flows around the new buildings, specifically the Logistics Warehouse and Shops building, increases in onsite flooding as a result of redirected flood flows would be minor and increases in offsite flooding would not occur. This impact would be less than significant.

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

Less Than Significant Impact. As stated in response to criterion c(iv), the project site is located with FEMA flood zone AE, which is a SFHA subject to inundation by the 100-year flood with a base flood elevation of approximately 10 feet and Zone X, which is a zone subject to the 1% annual changes flood with average depth of less than one foot or with drainage areas of less than one square mile (FEMA 2019). The project site experiences overland flooding in its existing condition. During 100-year storm events, water ponds on site in low-lying areas to a depth of around one (1) foot at the CNG fueling station, the northernmost parking lot, the parking lot immediately northwest of the Operations Building, the outdoor materials storage area along the eastern property line (i.e., the future location of the Logistics Warehouse and Shops Building), and several locations along the southern property line near the southern corner of the property.

A tsunami is a large tidal wave generated by an earthquake, landslide, or volcanic eruption. Tsunami inundation maps have been developed for the San Francisco Bay area. The project site is not within a tsunami inundation zone; therefore, it would not be subject to flooding from a tsunami (California Department of Conservation 2021).

Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, swimming pools, or semi-enclosed bodies of water, such as San Francisco Bay. The project site is 0.5 miles west of the San Francisco Bay; however, as it is not within the tsunami inundation zone for the Bay, the site is not expected to be inundated by a seiche (California Department of Conservation 2021).

Although the project site is at risk of inundation from flooding, the project would reduce the risk of flooding on the site through compliance with the City's Municipal Code Chapter 15.56 (Flood Damage Prevention). Section 15.56.080 requires a development permit to be obtained before construction begins in a SFHA. City building permits serve as the vehicles for permitting development in the floodplain. Municipal Code Section 15.56.120 sets forth construction requirements for development that would minimize flood hazard risks. Compliance with Chapter 15.56 of the Municipal Code would identify measures to help prepare the site in the event of a flood and would help reduce the potential for pollutants at the project site from being released. Further, as discussed in criteria c(ii) and c(iii), while the project would result in minor increases in onsite flood water ponding under proposed conditions, this flooding would be contained onsite. The project would not result in new offsite flooding.

As discussed in Section, 3.9 Hazards and Hazardous Materials, to prevent the possibility of the escape of contaminants into on-site utilities systems, the six fleet maintenance garage bays would not have connections to storm drains or sanitary sewer lines. Spills would be contained and trained staff would use on-site materials and equipment to absorb and properly dispose of contaminants. All hazardous materials drums and containers located on site would be stored off the ground in secondary containment or on pallets. These measures would reduce the potential for the release of pollutants into the environment during project inundation.

As discussed in the response to criteria c(ii) and c(iii) in this section and in Section 3.9, Hazards and Hazardous Materials, the treated pole storage bins would elevate treated power poles off the ground and each bin would have an automatic cover. The treated pole storage area and outdoor gas and electrical materials storage areas would be surrounded by drive-over concrete berms. The Material storage area adjacent to the Material storage building would have a covered canopy and would be surrounded by a concrete curb. Runoff and flood waters would be directed away from the Material storage building, covered canopy Material storage area, treated pole storage area, and gas and electrical materials storage area into storm water runoff trench drains and storm drain inlets and then into the storm drain system. Wash-off water from the interiors of these storage areas would be directed to the sanitary sewer. These site design features would reduce the potential for the release of pollutants off site during project inundation.

In addition, to comply with C.3 provisions of the MRP, post construction BMPs are required to protect water quality at the site. The project Applicant would also be required to prepare a project Stormwater Operations and Maintenance Plan. The risk of pollutant release due to project inundation is expected to be low based on project characteristics and requirements set forth in the City's Municipal Code. This impact would be less than significant.

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

No Impact. The project would comply with all applicable regulations to protect water quality (see response to criterion a) and would not impact ground water (see response to criterion b). Therefore, the project would not obstruct implementation of a water quality control plan or groundwater management plan. No impact would occur.

3.10.4 References

- BKF Engineers. 2023a. 275 Industrial Road – Stormwater Management Memo. January 6, 2023.
- _____. 2023b. 275 Industrial Road – Belmont Creek Flood Evaluation. October 18, 2023.
- California Department of Conservation. 2021. San Mateo County Tsunami Hazard Areas. Accessed November 14, 2023, at <https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo>.
- City of San Carlos. 1994. Municipal Code Chapter 13.14 Stormwater Management and Discharge Control.
- _____. 2008. Municipal Code Chapter 15.56 Flood Damage Prevention.
- Federal Emergency Management Agency (FEMA). 2019. National Flood Insurance Program Flood Insurance Rate Map #06081C0169G. Accessed November 14, 2023, at <https://msc.fema.gov/portal/home>.
- OneShoreline (San Mateo County Flood and Sea Level Rise Resiliency District). 2024. OneShoreline Bayside Map of Future of Conditions. Accessed June 20, 2024 at <https://oneshoreline.maps.arcgis.com/apps/instant/sidebar/index.html?appid=ed2a5cb599ca4651bc6a0c3530271905&locale=en>.
- Pacific Gas & Electric Company (PG&E) Construction Stormwater Group. 2017. Good housekeeping Activity Specific Erosion and Sediment Control Plan (A-ESCP). April 2017.

San Mateo County. 2021. *2021 Multijurisdictional Local Hazard Mitigation Plan, City of San Carlos Annex*. October 2021. Accessed November 14, 2023, at <https://www.smcgov.org/ceo/2021-multijurisdictional-lhmp>.

Terracon Consultants, Inc. 2020. Geotechnical Engineering Report PG&E San Carlos Service Center Improvements San Carlos, San Mateo County, California. November 3, 2020.

3.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.11.1 Environmental Setting

The project site is currently developed with the PG&E Service Center, including a Shops building, Fleet building, Operations building, and accessory buildings. The project site has a zoning designation of Industrial Professional, and a General Plan designation of Planned Industrial. Surrounding land uses include a medical facility, biotechnology company, an industrial supply manufacturer, and a Honda car dealership. Highway 101 borders the site to the east.

3.11.2 Regulatory Setting

Local Regulations

City of San Carlos General Plan

The San Carlos 2030 General Plan designates the project site as Planned Industrial, a land use designation intended primarily for production and manufacturing uses. Uses in this land use designation generally include retail, manufacturing, service, office, R&D, and industrial uses. The General Plan contains other policies that are applicable to the proposed project. These policies are presented in the environmental resource sections that they are applicable to. For example, policies related to aesthetics are presented in Section 3.1.2 and policies related to geology and soils are presented in Section 3.7.2.

City of San Carlos Zoning Code

The City's Zoning Code is contained as Title 18 of the Municipal Code. The project site has a zoning designation of IP (Industrial Professional) (see Chapter 18.07). This zoning designation has a maximum building height of 100 feet, a maximum floor area ratio (FAR) of 2.0, and requires a 20-foot setback on front and a 5-foot setback on street side lot lines (see Municipal Code Table 18.07.030). Additional details regarding aesthetics of the IP and Planned Industrial designations, as well as information on the City's design review process, can be found in Section 3.1.2.

San Carlos Municipal Code Section 18.20.040, Required Parking Spaces, requires vehicular parking space per 300 SF of office floor area, plus 1 space for each fleet vehicle. Municipal Code Section 18.20.080, Bicycle Parking, requires long-term parking for twenty-five (25) or more full-time equivalent employees at a minimum ratio of one (1) space per twenty (20) vehicle spaces.

Per Section 18.14A.030 (Conditional use permit requirements) of the San Carlos Municipal Code, the Northeast Area Overlay District requires a conditional use permit for a majority of projects and development activity in the San Carlos Northeast Area until the Northeast Area Specific Plan is adopted. Pursuant to the San Carlos Municipal Code (Section 18.26.030(D)),

conditional use permits for the Northeast Area are under the authority of the Planning and Transportation Commission, who shall consider whether to “approve, conditionally approve, or deny applications for conditional use permits [in the Northeast Area].” The Northeast Area Specific Plan has not yet been adopted. The project site is located within the Northeast Area Overlay District and qualifies as an application requiring a conditional use permit because it satisfies the following criteria: “Design review, any projects that already require a use permit (in this case only one (1) use permit required), minor use permit, temporary use permit, planned development, zoning amendment, waiver, variance, general plan amendment, development agreement, or any other discretionary approval from the City of San Carlos necessary for the development of a site within the Northeast Area (Section 18.14A.020) in accordance with the San Carlos Zoning Ordinance.”

San Carlos Airport Land Use Compatibility Plan

The project is located in the San Carlos Airport Land Use Compatibility Plan (ALUCP) area. According to the ALUCP, the project site is not within a primary flight path, but is within Zone 6, the traffic pattern zone. Under the ALUCP, the project site has an allowable height of 155 feet (C/CAG 2015).

Climate Mitigation and Adaptation Plan

On September 27, 2021, San Carlos adopted the Climate Mitigation and Adaptation Plan (CMAP). The CMAP details the City’s strategy for reducing city-wide GHG emissions through 2030 and 2050 and identifies 12 climate adaptation and resiliency strategies for preparing the city for the adverse effects anticipated under a changing climate. The following reflects adaptation strategies that may be applicable to the proposed project:

- **Strategy 36: Open Space Preservation.** Preserve existing open space by supporting urban infill.
- **Strategy 37: Heat Island Effect.** Minimize the urban heat island effect.

Section 3.8, Greenhouse Gas Emissions, of this Initial Study addresses the strategies that would be applicable to the project from a GHG emissions standpoint.

3.11.3 Discussion

Would the project:

a) Physically divide an established community?

No Impact. The proposed project would occur on a site that is currently developed with facilities comprising the PG&E San Carlos Service Center. The project would not alter existing roadway patterns and would not introduce any new major roadways or other physical features that would create new barriers in existing residential neighborhoods or other communities. As such, the project would not physically divide an established community. No impact would occur.

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

Less than Significant Impact. The proposed project would not conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect.

Table 3-6: Project Consistency with Applicable General Plan Policies Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
<i>Land Use Element</i>	
POLICY LU-1.10 Require that development within the Pulgas, Brittan and Cordilleras Creek watersheds shall preserve watershed integrity, including natural vegetation, soil and slope stability, water quality, scenic values, and archaeological resources.	See Section 3.1 Aesthetics, Section 3.4 Biological Resources, Section 3.7 Geology and Soils, Section 3.10 Hydrology and Water Quality, and Section 3.5, Cultural Resources. Project compliance with existing regulations and implementation of mitigation measures included in these sections would ensure the project does not work against the preservation of natural vegetation, soil and slope stability, water quality, scenic values, and archaeological resources. The project is consistent with this policy.
POLICY LU-1.15 Measures of impact to traffic from development may include Level of Service (LOS), Vehicle Miles Traveled (VMT), pedestrian delay, or other measures.	See Section 3.17 Transportation. The project would not have a significant VMT impact. The project is consistent with this policy.
POLICY LU-5.11 Continue to require developers to pay their fair share of the capital cost of public facilities through appropriate development impact and utility connection fees.	The project Applicant would pay development impact and utility connection fees through compliance with project conditions of approval (COAs). The project is consistent with this policy.
POLICY LU-6.2 Support commercial/ industrial activity and businesses on the East Side. Prohibit the conversion of property designated for industrial/commercial land on the East Side to non- industrial/commercial uses. a. Ensure proposed new uses in the East Side do not introduce land use conflicts that would adversely impact industrial/commercial activities.	The project site is designated for industrial use and would remain designated for industrial use. The project is consistent with this policy.
POLICY LU-6.6 Encourage new development on the East Side to feature high quality architecture that reinforces the character of the area.	The new project buildings would be designed to meet the City's design review standards for buildings on sites with the Planned Industrial land use designation. The project is consistent with this policy.

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
POLICY LU-6.7 Maintain and strengthen industrial uses in the inner core of the East Side area.	The project would maintain and strengthen the site's existing industrial uses. The project is consistent with this policy.
POLICY LU-6.8 Strongly discourage the land subdivision of large, existing industrial parcels in the East Side area.	The project would not subdivide the project site, which is a large industrial parcel. The project is consistent with this policy.
POLICY LU-8.1 Require all development to feature high quality design that enhances the visual character of San Carlos.	The new project buildings would be designed to meet the City's design review standards for buildings on sites with the Planned Industrial land use designation. The project is consistent with this policy.
POLICY LU-8.2 Ensure that new development sensitively transitions to the character of adjacent structures and the immediate neighborhood.	The project vicinity contains industrial, commercial, research and development and hospital land uses. The project would not conflict with the character of adjacent structures or the immediate neighborhood. The project is consistent with this policy.
POLICY LU-12.1 Evaluate historical and cultural resources early in the development review process through consultation with interested parties.	See Section 3.5 Cultural Resources and Section 3.18 Tribal Cultural Resources. The City has contacted the eight tribes listed in the Native American Heritage Commission's (NAHC) San Mateo County tribal contact list. The project is consistent with his policy.
POLICY LU-12.5 Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.	Implementation of Mitigation Measure CUL-3 in Section 3.5 Cultural Resources would ensure the project complies with the California Native American Graves Protection and Repatriation Act and other appropriate laws. The project is consistent with this policy.
<i>Circulation and Scenic Highways</i>	
POLICY CSH-3.3 Support the incorporation of Transportation Demand Measures in new development to reduce traffic impacts.	The City intends to exempt the project from the City's TDM Plan requirements because it is not changing any existing activities on site and would not generate new vehicle trips. The project is consistent with this policy.
POLICY CSH-3.9 Where appropriate and relevant, based on the location and scope of a development project under consideration,	See Section 3.17 Transportation. The project would meet the City's VMT screening criteria and would have a less than significant traffic

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
the City shall consider regional, as well as local traffic impacts when assessing new development projects.	impact. The project is consistent with this policy.
POLICY CSH-3.11 New developments and businesses shall be required to provide adequate loading, unloading and delivery areas, and/or shall be required to conduct such activities during non- business/peak hours.	The project would provide six on-site loading areas totaling 29,649 sq. ft. The project is consistent with this policy.
<i>Environmental Management</i>	
POLICY EM-1.1 Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications.	See Section 3.4 Biological Resources. The project's potential impacts on biological resources would be less than significant with the implementation of Mitigation Measure BIO-1. The project is consistent with this policy.
POLICY EM-1. Ensure that development is consistent with all federal, State and regional regulations for habitat and species protection.	See Section 3.4 Biological Resources. With the implementation of Mitigation Measure BIO-1, the project would be consistent with all federal, State, and regional regulations for habitat and species protection. The project is consistent with this policy.
POLICY EM-1.4 Protect and preserve the circadian cycle (the cycle of night and day) by limiting sources of light during nighttime hours.	The project would operate mainly during daytime hours, 6:30 a.m. to 5:00 p.m. The project is consistent with this policy.
POLICY EM-2.1 Preserve and enhance riparian areas.	See Section 3.4 Biological Resources. The project does not propose work within the drainage ditches surrounding the site and, therefore, would not impact any of the riparian habitats or natural communities that border the project site. The project is consistent with this policy.
POLICY EM-2.2 Continue to enforce the City's Riparian Ordinance for all four of the City's creeks (Pulgas, Brittan, Cordilleras and Belmont) and their tributaries.	See Section 3.4 Biological Resources. The project does not propose work within the drainage ditches surrounding the site and, therefore, would not impact any of the riparian habitats or natural communities that border the project site. The project is consistent with this policy.

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
POLICY EM-2.6 Encourage property owners to replace fallen trees along waterways to maintain an upper canopy of vegetation. The species shall be as approved by the City arborist. Encourage use of trees native to the area.	The project would comply with any applicable requirements to replace fallen trees within the drainage ditches it has ownership of. The project is consistent with this policy.
Policy EM-2.7 Retain Pulgas, Brittan, Cordilleras and Belmont Creek channels and their 100-year floodplains wherever possible as natural open space areas. These areas are to function as storm drainage facilities and as open space greenbelts to support natural habitat.	The project site is currently approximately 88 percent impervious surface area. The project would increase the amount of pervious surface area on site. The project would not alter the drainage ditches that surround the project site. The project is consistent with this policy.
POLICY EM-5.1 Reduce the discharge of toxic materials into the city's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).	See Section 3.9 Hazards and Hazardous Materials. The project applicant has designed the site redevelopment to prevent contact of the hazardous materials that would be used and stored on site with the surrounding drainage ditches and the City's storm drain and sanitary sewer systems. The project applicant implements a site-specific Hazardous Materials Business Plan (HMBP) which contains BMPs for the management and containment of hazardous materials used and stored on site. The project is consistent with this policy.
POLICY EM-5.3 Promote the conservation and efficient use of water in new and existing residences and by commercial and industrial consumers.	The proposed project includes a covered vehicle wash bay in the Fleet building. The covered wash bay would collect, clean, and reuse water used in the wash bay. The project is consistent with this policy.
POLICY EM-5.5 Recycled water distribution system (purple pipe) should be used for landscaping and other non-potable water uses for residential, commercial and industrial customers, where technically and financially feasible.	The project would not use a recycled water distribution system. However, the proposed project includes a covered vehicle wash bay in the Fleet building. The covered wash bay would collect, clean, and reuse water used in the wash bay. Because the City does not require the project to use a recycled water distribution system, the project is consistent with this policy.

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
POLICY EM-5.7 Encourage site designs that manage the quantity and quality of storm water run-off.	See Section 3.9 Hazards and Hazardous Materials and Section 3.10 Hydrology and Water Quality. The project applicant has designed the site redevelopment to prevent contact of the hazardous materials that would be used and stored on site with the surrounding drainage ditches and the City's storm drain and sanitary sewer systems. The project applicant implements a site-specific Hazardous Materials Business Plan (HMBP) which contains BMPs for the management and containment of hazardous materials used and stored on site. The project would build upon the existing on-site storm drain system by installing new storm drain lines and inlets and bioretention area and flow through planters. The project is consistent with this policy.
POLICY EM-5.10 Require the evaluation of potential groundwater depletion that could occur from new development through dewatering.	The project geotechnical report for the building construction phase of the proposed Master Plan will be required by the City to include an evaluation of potential groundwater depletion that could occur from new development through dewatering. The project is consistent with this policy.
POLICY EM-6.4 Implement Bay Area Air Quality Management District (BAAQMD) guidelines that establish minimum screening or buffer distances between emissions sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements but can be determined compatible with adjacent uses through a project-specific study that determines potential health risk. Mitigation measures shall be required to reduce these risks to acceptable levels.	See Section 3.3 Air Quality. The project includes industrial uses and hazardous materials storage and would be located near the Sutter Medical/PAMF facility, but the project would not expose sensitive receptors to substantial pollutant concentrations. The project is consistent with this policy.
POLICY EM-6.5 Consider potential impacts from land uses that may emit pollution and/or odors when locating air pollution sources near sensitive receptors. Air pollution sources could include freeways, industrial uses, hazardous materials storage, waste	See Section 3.3 Air Quality. The project includes industrial uses and hazardous materials storage and would be located near the Sutter Medical/PAMF facility, but the project would not expose sensitive receptors to substantial pollutant concentrations. The project is consistent with this policy.

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
disposal/transfer stations and other similar uses.	
POLICY EM-6.6 BAAQMD recommended measures to reduce PM ₁₀ and exhaust emissions associated with construction shall be applied to new development in San Carlos.	See Section 3.3 Air Quality. Project construction emissions would fall below all BAAQMD significance thresholds for criteria air pollutant emissions. The project is consistent with this policy.
POLICY EM-7.1 Take appropriate action to address climate change and reduce greenhouse gas emissions.	See Section 3.8 Greenhouse Gas Emissions. Proposed building renovations and project compliance with the City's REACH Code would support efforts to reduce greenhouse gas emissions in the City. The project is consistent with this policy.
POLICY EM-9.1 Provide assistance and support efforts for increased energy efficiency for businesses and residences through a combination of incentives and regulations.	See Section 3.8 Greenhouse Gas Emissions. Proposed building renovations and project compliance with the City's REACH Code would support efforts to reduce greenhouse gas emissions in the City. The project is consistent with this policy.
POLICY EM-9.2 Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass facilities.	The project proposes to install Photovoltaic (PV) carports in the employee parking lot adjacent to the Operations building. The San Carlos Service Center would use solar power generated through the new PV panels. The project is consistent with this policy.
POLICY EM-9.6 Encourage new private construction and major remodels to be designed to meet or exceed Green Uniform Building Code requirements.	The project would meet Green Uniform Building Code requirements. The project is consistent with this policy.
POLICY EM-11.6 Encourage employers to incentivize employee use of mass transit and alternative modes of transportation.	The City intends to exempt the project from the requirement to prepare a TDM Plan.
<i>Environmental Safety and Public Services</i>	
Policy ESPS-1.1 The City Building Official shall verify geotechnical and soils reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard, and appropriate mitigation measures.	The project will comply with all geotechnical and soils report requirements to reduce the effects of serious geologic risks. Compliance will be achieved through project conditions of approval (COAs). The project is consistent with this policy.

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
Based on the findings of these reports, the City shall require that new structures are designed and built to withstand the effects of seismically-induced ground failure.	
Policy ESPS-1.2 Prohibit structural development in known areas where seismic and geological hazards cannot be mitigated.	The project site is not located in a known area where seismic and geologic hazards cannot be mitigated. The project will comply with all geotechnical and soils report requirements to reduce the effects of serious geologic risks. Compliance will be achieved through project conditions of approval (COAs). The project is consistent with this policy.
Policy ESPS-1.3 Continue to monitor and enforce mitigation measures to reduce risk for projects where geological and seismic hazards can be mitigated.	The project will comply with all geotechnical and soils report requirements to reduce the effects of serious geologic risks. Compliance will be achieved through project conditions of approval (COAs). The project is consistent with this policy.
Policy ESPS-2.4 Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.	The project would result in a decrease in on-site impervious surface area. The project is consistent with this policy.
Policy ESPS-2.9 Reduce losses due to flooding by encouraging property owners who experience flood damage to reconstruct their properties in a flood-resistant manner.	See Section 3.10 Hydrology and Water Quality. The new buildings would be raised at least 1-foot above BFE. Outdoor materials storage areas have been designed to minimize potential contact of flood waters with hazardous materials. The project is consistent with this policy.
Policy ESPS-2.10 Incorporate stormwater drainage systems in development projects to effectively control the rate and amount of runoff to prevent increases in downstream flooding potential.	The project would install new storm drain lines and inlets and new bioretention areas and flow through planters. The project is consistent with this policy.
Policy ESPS-3.9 Incorporate or require the incorporation of fire safety features in new development and redevelopment.	The project would comply with Fire Code regulations as required by the project conditions of approval (COAs) and the City's development review process. The project is consistent with this policy.
Action ESPS-3.12 Require new development projects have adequate water supplies to	The project would comply with Fire Code regulations as required by the project

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meet the fire-suppression needs of the project without compromising existing fire suppression services to existing uses.	conditions of approval (COAs) and the City's development review process. The project is consistent with this policy.
Policy ESPS-3.13 Ensure new and existing public and privately owned properties are constructed and maintained in a manner that minimizes and reduces fire hazard threats and has adequate fire protection.	The project would comply with Fire Code regulations as required by the project conditions of approval (COAs) and the City's development review process. The project applicant has prepared a Fire Access Plan to ensure adequate fire and emergency services access to on-site buildings. The project is consistent with this policy.
Policy ESPS-5.2 Require producers of and users of hazardous materials in San Carlos to conform to all local, State and federal regulations regarding the production, disposal, and transportation of these materials.	See Section 3.9 Hazards and Hazardous Materials. The project involves the routine use of hazardous materials. The project would conform to all local, State and federal regulations regarding the use, storage, disposal, and transportation of these materials. The project is consistent with this policy.
Policy ESPS-5.3 Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria, and standards enforcement.	See Section 3.9 Hazards and Hazardous Materials. The project would conform to all local, State and federal regulations regarding the use, storage, disposal, and transportation of hazardous materials. The project is consistent with this policy.
Policy ESPS-5.5 Where deemed necessary, based on the history of land use, require site assessment for hazardous and toxic soil contamination prior to approving development project applications.	See Section 3.9 Hazards and Hazardous Materials. A Phase I ESA and an LSI were prepared for the project. The project will implement the recommendations contained within the LSI. The project is consistent with this policy.
Policy ESPS-5.6 Require that new development proposals are reviewed for legally required remediation by authorities with jurisdictional authority over groundwater and surface water contamination including but not limited to San Mateo County Environmental Health, State Water Quality Control Board and the Army Corps of Engineers, where waters of the United States are involved, and collaborate with authorities	See Section 3.9 Hazards and Hazardous Materials. The project is required to prepare a SGMP, which will be reviewed and approved by San Mateo County Environmental Health. Implementation of the SGMP will be overseen by San Mateo County Environmental Health. The project is required to coordinate with the San Mateo Countywide Water Pollution Prevention Program to allow soil and stormwater runoff sampling onsite prior to construction activities for the documentation for potential sources of PCBs

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
to ensure all relevant remediation requirements are met.	on and adjacent to the project site. The project is consistent with this policy.
Policy ESPS-5.8 Require the preparation of emergency response plans as part of use applications for all large generators and users of hazardous waste as required by federal law.	The project applicant maintains a HMBP, which contains an emergency response plan and related protocols, for the San Carlos Service Center. The project is consistent with this policy.
Policy ESPS-6.1 Maintain land use and development in the vicinity of San Carlos Airport that are consistent with the relevant airport/land use compatibility criteria and guidelines contained in the adopted Airport/Land Use Compatibility Plan for the environs of San Carlos Airport, including noise, safety, height, and aviation easement requirements.	The project would be consistent with the adopted Airport/Land Use Compatibility Plan for the environs of San Carlos Airport. The project is consistent with this policy.
Policy ESPS-11.6 Ensure all new development and substantial retrofit projects are planned and designed to accommodate increases in sea level rise.	See Section 3.10 Hydrology and Water Quality. The proposed buildings will be raised at least 1-foot above BFE. The project flood study, which considered the potential effects of projected sea level rise on on-site flooding, determined the project would result in a minor increase in on-site flooding during 100-year flood events and no effect on off-site flooding. The project is consistent with this policy.
Policy ESPS-13.10 Require existing overhead utility lines be placed underground in new development and redevelopment through a phased program of conversion in existing overhead areas.	The project would underground the existing overhead utility lines on site. The project is consistent with this policy.
<i>Noise</i>	
POLICY NOI-1.1 Use the Noise and Land Compatibility Standards shown in Figure 9-1, the noise level performance standards in Table 9-1 and the projected future noise contours for the General Plan shown in Figure 9-3 and detailed in Table 9-2, as a guide for future planning and development decisions.	See Section 3.13 Noise. Project implementation of Mitigation Measure NOI-1 would ensure the proposed generator would not conflict with the noise level standards in Table 9-1 of the General Plan Noise Element. The project is consistent with this policy.
POLICY NOI-1.2 Minimize noise impacts on noise- sensitive land uses. Noise-sensitive	See Section 3.13 Noise. Project construction noise would be temporary and would not

Applicable General Plan Policy Adopted for the Purpose of Avoiding or Mitigating an Environmental Effect	Project Consistency
land uses include residential uses, retirement homes, hotel/motels, schools, libraries, community centers, places of public assembly, daycare facilities, churches and hospitals.	produce the same sound levels every day. Construction activities would occur within the permissible timeframes in the City's Municipal Code and would therefore not conflict with any applicable standards. Project implementation of Mitigation Measure NOI-1 would ensure the proposed generator would not conflict with the noise level standards in Table 9-1 of the General Plan Noise Element. The project is consistent with this policy.
POLICY NOI-1.3 Limit noise impacts on noise-sensitive uses to noise level standards as indicated in Table 9-1.	See Section 3.13 Noise. Project implementation of Mitigation Measure NOI-1 would ensure the proposed generator would not conflict with the noise level standards in Table 9-1 of the General Plan Noise Element. The project is consistent with this policy.
POLICY NOI-1.8 During all phases of construction activity, reasonable noise reduction measures shall be utilized to minimize the exposure of neighboring properties to excessive noise levels. a. Construction activities shall comply with the City's noise ordinance.	See Section 3.13 Noise. Project construction noise would be temporary and would not produce the same sound levels every day. Construction activities would occur within the permissible timeframes in the City's Municipal Code and would therefore not conflict with any applicable standards. The project is consistent with this policy.
POLICY NOI-1.12 Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan.	The project is consistent with the noise computability policies and criteria in the San Carlos ALUCP. The project is consistent with this policy.

Table 3-7: Project Consistency with Applicable Zoning Ordinance Regulations (IP District)

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
<u>Section 18.07.030 Development Standards</u> Minimum Lot Size (sq. ft.)	1 acre	The project site is 18.39 acres in size. The project is consistent with this standard.
<u>Section 18.07.030 Development Standards</u> Maximum Lot Size (sq. ft.)	N/A	The Maximum Lot Size standard does not apply in the IP District. The project is consistent with this standard.

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
<u>Section 18.07.030</u> <u>Development Standards</u> Minimum Lot Width (ft.)	75 feet	The project sit exceeds 75 feet in width. The project is consistent with this standard.
<u>Section 18.07.030</u> <u>Development Standards</u> Maximum Height (ft.)	100 feet	The tallest of the proposed buildings would be 32 feet high (Fleet building). The project is consistent with this standard.
<u>Section 18.07.030</u> <u>Development Standards</u> Minimum Setbacks (ft.)	Front = 20 feet Interior Side = 0 feet Street Side = 5 feet Rear = 0 feet	The proposed minimum setbacks are as follows: Front = 118 feet Interior Side = 34 feet Street Side = N/A Rear = 28 feet The project is consistent with this standard.
<u>Section 18.07.030</u> <u>Development Standards</u> Maximum Floor Area Ratio (FAR)	2.0	The proposed FAR is 0.166. The project is consistent with this standard.
<u>Section 18.07.030</u> <u>Development Standards</u> Project Sites of More than One Acre (FAR)	N/A	The proposed FAR is 0.166. The project is consistent with this standard.
<u>Section 18.07.040</u> <u>Supplemental Regulations</u> A. Landscaping	A minimum of ten percent (10%) of the site must be landscaping.	14.1 percent of the project site would be landscaping. The project is consistent with this standard.
<u>Section 18.07.040</u> <u>Supplemental Regulations</u> B. Building Design Near Highway 101.	For any site that is fully or partially located within two hundred (200) feet of the right-of-way line of Highway 101, buildings shall be designed with four (4) sided architecture where each exterior wall is designed equivalent to the primary facade in the extent of building articulation and quality of	The project buildings that would be within 200 feet of the right-of-way line of Highway 101 are designed with four (4) sided architecture where each exterior wall is designed equivalent to the primary facade in the extent of building articulation and quality of exterior materials, and consistent with the color scheme of the primary facade.

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
	exterior materials, and consistent with the color scheme of the primary facade.	The project is consistent with this standard.
<u>Section 18.07.040 Supplemental Regulations</u> C. Sidewalks.	Sidewalks shall be provided if none already exist or if the existing sidewalks are in poor condition.	The existing sidewalk along Industrial Road would be retained by the project. The project is consistent with this standard.
<u>Section 18.07.040 Supplemental Regulations</u> D. Parking Location	Parking shall be located at the side or rear of buildings wherever possible. 1. Customer parking should be located near the office area. 2. Where parking is located between a building and a street, a landscaped setback at least ten (10) feet wide must be provided between the parking area and adjacent right-of-way.	1. Visitor parking would continue to be located in front of the Operations (office use) building. Employee parking would continue to be located at the side of the Operations building. 2. A landscaped setback at least 10 feet in width is located between the visitor parking area adjacent to the Operations building and the Industrial Road ROW. The project is consistent with this standard.
<u>Section 18.07.040 Supplemental Regulations</u> E. Limitations on Curb Cuts.	Wherever possible, parking and loading entrances shall share curb cuts in order to minimize the overall number of curb cuts. On corner lots, curb cuts shall be located on the street frontage with the least pedestrian activity wherever feasible.	The existing site driveways to be retained for the project serve as both parking and loading entrances. The project is consistent with this standard.
<u>Section 18.07.040 Supplemental Regulations</u> F. Access Location.	Access shall be provided from a side street or alley wherever possible.	Access to the site would continue to be provided from Industrial Road because there are no side streets nor alleys by which the project site can be

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
		accessed. The project is consistent with this standard.
<p><u>Section 18.07.040 Supplemental Regulations</u></p> <p>G. Truck Docks, Loading, and Service Areas.</p>	<p>The outermost point of the truck docks, loading, and service areas are not permitted within thirty (30) feet of the boundary of an RS district.</p>	<p>The outermost points of loading and services areas within the project site would not be located within 30 feet of the boundary of an RS district. The project is consistent with this standard.</p>
<p><u>Section 18.14A.030 Conditional Use Permit Requirements</u></p> <p>The Northeast Area Overlay District requires a conditional use permit for a majority of projects and development activity in the San Carlos Northeast Area until the Northeast Area Specific Plan, as set forth in Resolution 2023-032, is adopted. Pursuant to the San Carlos Municipal Code (Section 18.26.030(D)), conditional use permits for the Northeast Area are under the authority of the Planning and Transportation Commission, who shall consider whether to “approve, conditionally approve, or deny applications for conditional use permits [in the Northeast Area].”</p>	<p>A. The following applications shall require a conditional use permit:</p> <ol style="list-style-type: none"> 1. A lot line adjustment and the subdivision of land within the Northeast Area in accordance with the City’s subdivision regulations and the Subdivision Map Act. 2. Design review, any projects that already require a use permit (in this case only one (1) use permit required), minor use permit, temporary use permit, planned development, zoning amendment, waiver, variance, general plan amendment, development agreement, or any other discretionary approval from the City of San Carlos necessary for the development of a site within the Northeast Area (Section 18.14A.020) in accordance with the San Carlos Zoning Ordinance. 	<p>The project requires and will obtain a conditional use permit. The project is consistent with this standard.</p>
<p><u>Section 18.20.040 Required Parking Spaces</u></p> <p>A. Minimum Number of Spaces Required. Each land use shall be provided at least</p>	<p>Office, Business and Professional (Operations Building):</p> <p>1 per 300 sq. ft. of floor area up to 100,000 sq. ft.</p>	<p>The project would provide 537 parking spaces, which exceeds the 513 required parking spaces (i.e., the sum of the requirements calculated separately for each use). The</p>

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
<p>the number of on-site parking spaces stated in this section.</p> <p>3. Other Districts. Each land use in all districts except for mixed-use and industrial arts districts shall be provided at least the number of on-site parking spaces stated in Table 18.20.040-A(3), Required On-Site Parking Spaces, Other Districts. The parking requirement for any use not listed in Table 18.20.040-A(3) shall be determined by the Director based upon the requirements for the most similar comparable use, the particular characteristics of the proposed use, and any other relevant data regarding parking demand.</p>	<p>-----</p> <p>Utilities, Major (Logistics Warehouse & Shops Building):</p> <p>1 for each employee on the largest shift plus 1 for each vehicle used in connection with the use. Minimum of 2.</p> <p>-----</p> <p>Utilities, Major (Fleet Building):</p> <p>1 for each employee on the largest shift plus 1 for each vehicle used in connection with the use. Minimum of 2.</p>	<p>project is consistent with this standard.</p>
<p><u>Section 18.20.040 Required Parking Spaces</u></p> <p>C. Sites with Multiple Uses.</p>	<p>If more than one (1) use is located on a site, the number of required on-site parking spaces and loading spaces shall be equal to the sum of the requirements calculated separately for each use unless a reduction is approved pursuant to Section 18.20.050, Parking reductions.</p>	<p>See response above. The project is consistent with this standard.</p>
<p><u>Section 18.20.070 Location of Required Parking</u></p> <p>B. Nonresidential Uses.</p>	<p>Required parking spaces serving nonresidential uses shall be located on the same lot as the use they serve, or in an off-site parking facility as provided in subsection C of this section. If located in an off-site parking facility, a parking agreement shall be filed as provided in subsection C of this section.</p>	<p>The project's required parking spaces will be located on the same lot as the uses they serve (i.e., 275 Industrial Road). The project is consistent with this standard.</p>

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
<p><u>18.020.080 Bicycle Parking</u></p> <p>B. Long-Term Bicycle Parking.</p>	<p>Long-term bicycle parking shall be provided in order to serve employees, students, residents, commuters, and others who generally stay at a site for four (4) hours or longer.</p> <p>1. Parking Spaces Required.</p> <p>a. Residential Uses. A minimum of one (1) long-term bicycle parking space shall be provided for every five (5) units for multi-unit residential and group residential projects.</p> <p>b. Other Uses. Any establishment with twenty-five (25) or more full-time equivalent employees shall provide long-term bicycle parking at a minimum ratio of one (1) space per twenty (20) vehicle spaces.</p> <p>c. Parking Structures. Long-term bicycle parking shall be provided at a minimum ratio of one (1) space per fifty (50) vehicle spaces.</p> <p>2. Location. Long-term bicycle parking must be located on the same lot as the use it serves. In parking garages, long-term bicycle parking must</p>	<p>The project provides 27 total long-term bike parking spaces, including four bike rack spaces, six bike lockers that hold 12 bikes, and 11 spaces inside the Operations building. Long-term bike parking spaces would be located at 275 Industrial Road. The project is consistent with this standard.</p>

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
	<p>be located near an entrance to the facility.</p> <p>3. Covered Spaces. At least fifty percent (50%) of required long-term bicycle parking must be covered. Covered parking can be provided inside buildings, under roof overhangs or awnings, in bicycle lockers, or within or under other structures.</p> <p>4. Security. Long-term bicycle parking must be in:</p> <ul style="list-style-type: none"> a. An enclosed bicycle locker; b. A fenced, covered, locked or guarded bicycle storage area; c. A rack or stand inside a building that is within view of an attendant or security guard or visible from employee work areas; or d. Other secure area approved by the Director. <p>5. Size and Accessibility. Each bicycle parking space shall be a minimum of</p>	

Applicable Zoning Ordinance Regulation	Zoning Ordinance Regulation Text	Project Consistency
	two (2) feet in width and six (6) feet in length and shall be accessible without moving another bicycle. Two (2) feet of clearance shall be provided between bicycle parking spaces and adjacent walls, poles, landscaping, street furniture, drive aisles, and pedestrian ways and at least five (5) feet from vehicle parking spaces.	
<p><u>18.020.090 On-Site Loading.</u></p> <p>A. Loading Spaces Required.</p>	<p>Every new building, and every building enlarged by more than five thousand (5,000) square feet of gross floor area that is to be occupied by a manufacturing establishment, storage facility, warehouse facility, retail store, eating and drinking, wholesale store, market, hotel, hospital, mortuary, laundry, dry-cleaning establishment, or other use similarly requiring the receipt or distribution by vehicles or trucks of material or merchandise shall provide off-street loading and unloading areas as follows:</p> <p>Gross Floor Area (sq. ft.) of 90,001—150,000 = 3 Required Loading Spaces</p>	<p>The project would provide six loading areas totaling 29,649 sq. ft. The project is consistent with this standard.</p>

San Carlos Climate Mitigation and Adaptation Plan

On September 27, 2021, San Carlos adopted the Climate Mitigation and Adaptation Plan (CMAP). The CMAP details the City's strategy for reducing city-wide GHG emissions through 2030 and 2050 and identifies 12 climate adaptation and resiliency strategies for preparing the

city for the adverse effects anticipated under a changing climate. The following reflects adaptation strategies that may be applicable to the proposed project:

- **Strategy 4: Electrification.** Transition to electricity as the primary energy source citywide.
- **Strategy 6: Rooftop Solar.** Continue to support and increase participation in rooftop and onsite solar energy systems in the community and at City facilities.
- **Strategy 18: Electric Vehicles.** Support residents and business owners to transition to electric and plug-in hybrid vehicles.

The proposed project would be consistent with the City's CMAP and would not conflict with a strategy that was adopted for the purposes of avoiding or mitigating an environmental impact.

San Carlos Airport Land Use Compatibility Plan

According to the ALUCP, the project site is not within a primary flight path, but is within Zone 6, the traffic pattern zone. While the project site's existing land use, a utility company service center, is not listed as a land use category in the ALUCP Table 4-4 Safety Compatibility Criteria, occupancies utilizing hazardous materials, storage of hazardous materials (gas stations, etc.), warehouses and distribution facilities, and repair garages not use of flammable objects are identified as compatible land uses in this zone. Under the ALUCP, the project site has an allowable height of 155 feet above mean sea level (MSL).

The tallest of the proposed buildings, the Fleet building, would have a height of 32 feet above MSL, well below the allowable height of 155 feet. Accordingly, the proposed project would not subject people working in the project building or structures to substantial safety hazards or excessive noise and the proposed building would not create a hazard to air navigation. This impact would be less than significant.

Conclusion

As demonstrated above, the project would be consistent with the City's General Plan, Municipal Code IP Zoning District development standards and parking requirements, CMAP, and San Carlos ACLUP. This impact would be less than significant.

3.11.4 References

City/County Association of Governments of San Mateo County (C/CAG). 2015. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*. Adopted October 2015. Available at: <https://ccag.ca.gov/wp-content/uploads/2015/06/Draft-Final-ALUCP-San-Carlos-Airport-062515.pdf>.

City of San Carlos. 2009. San Carlos General Plan: Envision 2030. Adopted October 12, 2009 and updated in January 2023.

_____. 2021b. City of San Carlos Climate Mitigation and Adaptation Plan. Adopted September 27, 2021

_____. 2024. San Carlos Municipal Code Title 18: Zoning. Revised April 2024.

3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local -general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.12.1 Environmental Setting

The project site is located in a developed area of the City of San Carlos on a parcel developed with PG&E Shops building, Fleet building, Operations building, accessory buildings, and a surface parking lot. There are no mines or known mineral resources in the City of San Carlos (San Carlos, 2009).

3.12.2 Discussion

Would the project:

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

No Impact (Responses a – b). No locally important mineral resources are designated in the City of San Carlos (San Carlos, 2009). The project site has no potential for use in resource recovery and therefore, would have no impact on the availability of mineral resources.

3.12.3 References

City of San Carlos. 2009. San Carlos General Plan: Envision 2030. Adopted October 12, 2009.

3.13 NOISE

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

3.13.1 Environmental Setting

Noise may be defined as loud, unpleasant, or unwanted sound. The frequency (pitch), amplitude (intensity or loudness), and duration of noise all contribute to the effect on a listener, or receptor, and whether the receptor perceives the noise as objectionable, disturbing, or annoying.

The Decibel Scale (dB)

The decibel scale (dB) is a unit of measurement that indicates the relative amplitude of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dBs is 100 times more intense, 30 dBs is 1,000 more intense, and so on. In general, there is a relationship between the subjective noisiness, or loudness of a sound, and its amplitude, or intensity, with each 10 dB increase in sound level perceived as approximately a doubling of loudness.

Sound Characterization

There are several methods of characterizing sound. The most common method is the “A-weighted sound level,” or dBA. This scale gives greater weight to the frequencies of sound to which the human ear is typically most sensitive. Thus, most environmental measurements are reported in dBA, meaning decibels on the A-scale.

Human hearing matches the logarithmic A-weighted scale, so that a sound of 60 dBA is perceived as twice as loud as a sound of 50 dBA. In a quiet environment, an increase of 3 dB is usually perceptible, however, in a complex noise environment such as along a busy street, a noise increase of less than 3 dB is usually not perceptible, while an increase of 5 dB is usually perceptible. Normal human speech is in the range from 50 to 65 dBA. Generally, as environmental noise exceeds 50 dBA, it becomes intrusive and above 65 dBA noise becomes excessive. Nighttime activities, including sleep, are more sensitive to noise and are considered affected over a range of 40 to 55 dBA. Table 3-8 lists typical outdoor and indoor noise levels in terms of dBA.

Table 3-8: Typical Outdoor and Indoor Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Jet flyover at 1,000 feet	-110-	Rock Band
Gas lawn mower at 3 feet	-100-	
	-90-	
Diesel truck at 50 feet at 50 mph	-80-	Food blender at 3 feet Garbage disposal at 3 feet
Noise urban area, daytime		
Gas lawnmower, 100 feet	-70-	Vacuum cleaner at 10 feet Normal speech at 3 feet
Commercial area		
Heavy traffic at 300 feet	-60-	
		Large business office
Quiet urban daytime	-50	Dishwasher next room
Quite urban nighttime	-40-	Theater, large conference room (background)
Quiet suburban nighttime		
	-30-	Library
Quite rural nighttime		Bedroom at night
	-20-	
		Broadcast/recording studio
	-10-	
Lowest threshold of human hearing	-0-	Lowest threshold of human hearing

Source: Caltrans 2013

Sound levels are typically not steady and can vary over a short time period. The equivalent noise level (L_{eq}) is used to represent the average character of the sound over a period of time. The L_{eq} represents the level of steady noise that would have the same acoustical energy as the sum of the time-varying noise measured over a given time period. L_{eq} is useful for evaluating shorter time periods over the course of a day. The most common L_{eq} averaging period is hourly, but L_{eq} can describe any series of noise events over a given time period.

Variable noise levels are values that are exceeded for a portion of the measured time period. Thus, L_{01} is the level exceeded one percent of the time and L_{90} is the level exceeded 90 percent of the time. The L_{90} value usually corresponds to the background sound level at the measurement location.

Noise exposure over the course of an entire day is described by the day/night average sound level, or L_{dn} , and the community noise equivalent level, or CNEL. Both descriptors represent the 24-hour noise impact on a community. For L_{dn} , the 24-hour day is divided into a 15-hour daytime period (7 AM to 10 PM) and a nine-hour nighttime period (10 PM to 7 AM) and a 10 dB "penalty"

is added to measure nighttime noise levels when calculating the 24-hour average noise level. For example, a 45 dBA nighttime sound level would contribute as much to the overall day-night average as a 55 dBA daytime sound level. The CNEL descriptor is similar to L_{dn} , except that it includes an additional 5 dBA penalty beyond the 10 dBA for sound events that occur during the evening time period (7 PM to 10 PM). The artificial penalties imposed during L_{dn} and CNEL calculations are intended to account for a receptor's increased sensitivity to sound levels during quieter nighttime periods.

Sound Propagation

The energy contained in a sound pressure wave dissipates and is absorbed by the surrounding environment as the sound wave spreads out and travels away from the noise generating source. Theoretically, the sound level of a point source attenuates, or decreases, by 6 dB with each doubling of distance from a point source. Sound levels are also affected by certain environmental factors, such as ground cover (asphalt vs. grass or trees), atmospheric absorption, and attenuation by barriers. Outdoor noise is also attenuated by the building envelope so that sound levels inside a residence are from 10 to 20 dB less than outside, depending mainly on whether windows are open for ventilation or not.

When more than one point source contributes to the sound pressure level at a receiver point, the overall sound level is determined by combining the contributions of each source. Decibels, however, are logarithmic units and cannot be directly added or subtracted together. Under the dB scale, a doubling of sound energy corresponds to a 3 dB increase in noise levels. For example, if one noise source produces a sound power level of 70 dB, two of the same sources would not produce 140 dB – rather, they would combine to produce 73 dB.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1-dB changes in sound levels when exposed to steady, single-frequency (“pure-tone”) signals in the mid-frequency (1,000–8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness.

Noise Effects

Noise effects on human beings are generally categorized as:

- Subjective effects of annoyance, nuisance, and/or dissatisfaction
- Interference with activities such as speech, sleep, learning, or relaxing
- Physiological effects such as startling and hearing loss

Most environmental noise levels produce subjective or interference effects; physiological effects are usually limited to high noise environments such as industrial manufacturing facilities or airports.

Predicting the subjective and interference effects of noise is difficult due to the wide variation in individual thresholds of annoyance and past experiences with noise; however, an accepted method to determine a person's subjective reaction to a new noise source is to compare it to the existing environment without the noise source, or the “ambient” noise environment. In general, the more a new noise source exceeds the ambient noise level, the more likely it is to be considered annoying and to disturb normal activities.

Existing Noise Environment

The primary sources of noise in San Carlos include vehicles, commercial uses, and activities associated with neighborhoods and schools. The primary source of noise at the project site is from traffic on surrounding roadways – primarily from Highway 101, Holly Street, and Industrial Road – and from adjacent properties, which produce noise from activities in parking lots, movement of various materials, and stationary sources (e.g., heating, ventilation, and air conditioning (HVAC) equipment). The project is also located in the San Carlos Airport Land Use Compatibility Plan (ALUCP) area (C/CAG, 2015) and may receive periodic noise from flights associated with the airport. According to the ALUCP, the project site is not within a primary flight path, but is within Zone 6, the traffic pattern zone. All commercial, manufacturing, R&D, and industrial land uses are identified as compatible uses in this zone. There are no private airstrips near the project site; no private airstrips or heliports are in the cities of San Carlos, Redwood City, or Belmont.

Existing ambient sound levels at the project site were not monitored, however noise levels were monitored at another property along Industrial Road approximately 1,800 feet southeast of the project site. These measured noise levels are considered representative of ambient noise levels at the project site due to the proximity of both the project site and the monitoring location to Highway 101, which is the predominant noise source contributing to the project site's ambient noise environment. Noise monitoring occurred at 405 Industrial Road from approximately 11 AM on Thursday, October 7, 2021, to approximately 11 AM on Friday, October 8, 2021. Ambient sound levels were measured with a Larson Davis Model LxT, Type I, sound level meter. Measurements were collected on 1-minute intervals. Weather conditions between October 7th and October 8th varied between clear and mostly-cloudy conditions, with high and low temperatures of 62 and 53 degrees, respectively.

One long-term (LT) measurement (i.e., 24-hours) was collected at the monitoring site. The results of the ambient noise monitoring are summarized in Table 3-9. It is noted that measured ambient noise levels are a composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location.

Table 3-9: Existing Ambient Noise Levels (dBA) at Representative Location

Monitoring Site	Duration	L _{min}	L _{max}	Hourly L _{eq} Range			L _{dn}
				Daytime (7 AM - 7 PM)	Evening (7 PM - 10 PM)	Nighttime (10 PM - 7 AM)	
LT-1	24 Hours	38.1	80.1	58.6 – 63.2	58.6 – 60.7	52.2 – 61.4	64.7
Source: MIG 2022							

As shown in Table 3-9 there was relatively little variation in daytime sound levels at the monitoring site; there was less than an approximately 5 dBA difference in hourly L_{eq} values from 7 AM to 7 PM. The difference in evening hourly L_{eq} values was even lower, at approximately 2 dBA. The measurements collected during the nighttime period (10 PM to 7 AM) showed the greatest variability. In general, sound levels tended to be quietest during the early morning hours (i.e., 1 AM and 2 AM) before gradually increasing with the morning commute (starting as early as 4 AM). Overall, the measurement collected at the monitoring site showed that 24-hour sound levels were approximately 64.7 L_{dn}.

Sensitive Receptors

Noise sensitive receptors are areas where unwanted sound or increases in sound may have an adverse effect on people or land uses. Residential areas, hospitals, schools, and parks are

examples of noise receptors that could be sensitive to changes in existing environmental noise levels. Noise sensitive receptors within 1,000 feet of the project site include:

- Residential dwelling units, the closest of which are approximately 745 feet south of the project site boundary on Fairfield Drive and Northwood Drive.
- A Sutter Health urgent care and outpatient medical facility, approximately 185 feet south of the project site.

There are no schools within 1,000 feet of the project site.

3.13.2 Regulatory Setting

State Regulations

California Green Building Standards Code

The California Green Building Standards Code is Part 11 of the California Building Standards Code. Chapter 5, Nonresidential Mandatory Standards, Section 5.507 establishes the following requirements for nonresidential development that may be applicable to the proposed project.

- Section 5.507.4.1.1 sets forth that buildings exposed to a noise level of 65 dBA L_{eq} (1-hour) during any hour of operation shall have exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composting sound transmission class (STC) rating of at least 45 (or an outdoor indoor transmission class [OITC] of 35), with exterior windows of a minimum STC of 40.
- Section 5.507.4.2 sets forth that wall and roof assemblies for buildings exposed to a 65 dBA L_{eq} pursuant to Section 5.507.4.1.1 shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed 50 dBA L_{eq} in occupied areas during any hour of operation. This requirement shall be documented by an acoustical analysis documenting interior sound levels prepared by personnel approved by the architect or engineer of record.

Local Regulations

City of San Carlos Municipal Code

The City of San Carlos Municipal Code Chapter 9.30 discusses noise control regulations. Chapter 9.30.070 Section B specifies that construction activities are exempt from noted regulations when limited to Monday through Friday between 8:00 AM and 6:00 PM, and Saturday and Sunday between 9:00 AM and 5:00 PM. No construction noise-related activities are permitted on holidays listed in the Municipal Code. All gasoline-powered construction equipment is required to be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to the systems is permitted (the Building Official shall have the authority to grant exceptions in specific cases).

City of San Carlos General Plan

The City of San Carlos General Plan provides guidance for the control of noise to protect residents, workers, and visitors from potentially adverse noise impacts. Its primary goal is to regulate long-term noise impacts to preserve acceptable noise environments for all types of land uses. Figure 9-1 in the City's General Plan Noise Element provides land use and noise compatibility standards for various land uses in the City. For office buildings, business, commercial, and professional land uses, noise levels up to 70 dBA L_{dn} are considered "Normally Acceptable".

The General Plan Noise Element also includes the following policies that may be applicable to the proposed project:

- **Policy NOI-1.2:** Minimize noise impacts on noise-sensitive land uses. Noise-sensitive land uses include residential uses, retirement homes, hotel/motels, schools, libraries, community centers, places of public assembly, daycare facilities, churches, and hospitals.
- **Policy NOI-1.3:** Limit noise impacts on noise-sensitive land uses to noise level standards as indicated in Table 9-1.
- **Policy NOI-1.8:** During all phases of construction activity, reasonable noise reduction measures shall be utilized to minimize the exposure of neighboring properties to excessive noise levels.
 - a. Construction activities shall comply with the City's noise ordinance.
- **Policy NOI-1.12:** Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan.
- **Action NOI-1.4:** Require the evaluation of mitigation measures for projects that would cause the following criteria to be exceeded or would cause a significant adverse community response:
 - a. Cause the L_{dn} at noise-sensitive uses to increase by 3 dB or more and exceed the "normally acceptable" level.
 - b. Cause the L_{dn} at noise-sensitive uses to increase 5 dB or more and remain "normally acceptable."
 - c. Cause noise levels to exceed the limits in Table 9-1.

Table 9-1 of the City's General Plan is presented below in Table 3-10. Only land uses relevant to the proposed project are shown.

Table 3-10: San Carlos General Plan Non-Transportation Noise Standards

Land Use Receiving the Noise	Hourly Noise-Level Descriptor	Exterior Noise-Level Standard in Any Hour (dBA)		Interior Noise-Level Standard in Any Hour (dBA)	
		Daytime (7AM – 10PM)	Nighttime (7AM – 10PM)	Daytime (7AM – 10PM)	Nighttime (7AM – 10PM)
Residential	L_{eq}	55	45	40	30
	L_{max}	70	60	55	45
Medical, convalescent	L_{eq}	55	45	45	35
	L_{max}	70	60	55	45

Sources: City of San Carlos 2009, Table 9-1

Notes:

1. The Residential standards shall apply to all residentially zoned properties.
2. Each of the noise levels specified above shall be lowered by 5 dBA for tonal noises characterized by a whine, screech, or hum, noise consisting primarily of speech or music, or reoccurring impulsive noises.
3. In situations where the existing noise level exceeds the noise levels indicated in the above table, any new noise source must include mitigation that reduces the noise level of the noise source to the existing level.
4. The exterior noise standards are measured at any point on the receiving property where there is, or could be in the future, frequent human use and quiet would be beneficial.
5. These standards do not apply to temporary sources such as construction activities.

3.13.3 Discussion

Would the project result in:

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

Less than Significant Impact with Mitigation Incorporated. Construction and operation of the proposed project would not result in a temporary or permanent increase in ambient noise levels in the vicinity of the project site that are in excess of standards established in the City's General Plan or Noise Ordinance, nor would it conflict with other applicable local, state, or federal standards.

Short-term, Temporary Construction Noise Levels

Construction of the proposed project would be phased (see Section 2.4.6) and could begin as early as 2024. During construction, heavy-duty off-road equipment (e.g., bulldozers, backhoes, loaders, etc.) would be required during demolition, grading and excavation, and renovation of the proposed PG&E Service Center. These activities could temporarily increase noise levels at adjacent properties. Typical noise levels that could be generated by equipment at the site are presented below in Table 3-11.

Table 3-11: Typical Construction Equipment Noise Levels

Equipment	Noise Level at 50 feet (L_{max}) ^(A)	Percent Usage Factor ^(B)	Predicted Equipment Noise Levels (L_{eq}) ^(C)					
			50 Feet	100 Feet	150 Feet	200 Feet	250 Feet	300 Feet
Auger Drill Rig	85	20	78	72	68	66	64	62
Backhoe	80	40	76	70	66	64	62	60
Bulldozer	85	40	81	75	71	69	67	65
Compact Roller	80	20	73	67	63	61	59	57
Excavator	85	40	81	75	71	69	67	65
Paver	85	50	82	76	72	70	68	66
Pneumatic tools	85	50	82	76	72	70	68	66
Delivery Truck	85	40	81	75	71	69	67	65
Scraper	85	40	81	75	71	69	67	65
Vibratory Roller	80	20	73	67	63	61	59	57

Sources: Caltrans, 2013; FHWA, 2010

(A) L_{max} noise levels based on manufacturer's specifications.

(B) Usage factor refers to the amount (percent) of time the equipment produces noise over the time period

(C) Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2009: L_{eq} (hourly) = L_{max} at 50 feet – $20\log(D/50) + 10\log(UF)$, where: L_{max} = reference L_{max} from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

As shown in Table 3-11, the worst case L_{eq} and L_{max} construction equipment noise levels associated with the project are predicted to be approximately 82 and 85 dBA, respectively, at 50 feet. When two or more pieces of equipment are operating in close proximity, construction noise levels would be approximately 85 dBA L_{eq} and 88 dBA L_{max} at a distance of 50 feet. These are considered to be worst-case noise levels, as the actual magnitude of the project's temporary and periodic increase in ambient noise levels would depend on the nature of the construction activity (e.g., demolishing the existing Shops and Fleet Maintenance buildings, grading the site, etc.) and the distance between the construction activity and receptor areas.

As construction equipment and work activities move around the site, typical noise levels associated with construction would fluctuate; at times they would be louder while equipment operates closer to receptor locations (i.e., toward property lines) and quieter as they operate toward the interior of the site (i.e., away from property lines). At a distance of 185 feet (i.e., the closest approximate distance between the PAMF facility and portion of the project site where development activities would occur – the PV system above parking), construction noise from a bulldozer (i.e., one of the loudest pieces of equipment that would operate at the site) would be

approximately 70 dBA L_{eq} . If two bulldozers were operating concurrently at the project boundary, noise levels could approach 73 dBA L_{eq} .

In general, noise levels associated with construction are anticipated to be much lower than 73 dBA L_{eq} at the nearby PAMF location, because the 73 dBA noise level estimate reflects two pieces of equipment operating at the property boundary. In actuality, equipment would primarily operate further into the site (i.e., to the north) away from the PAMF. A greater distance between the equipment and the receptor would result in lower noise levels due to atmospheric attenuation. At a distance of 625 feet (i.e., the distance from the PAMF facility to the approximate center of the project site) two bulldozers would generate noise levels closer to approximately 62 dBA L_{eq} .

Although construction activities would take place at the site over the next several years (due to the phased nature of the construction schedule), noise levels at nearby sensitive receptor locations would be less than significant for the following reasons:

- Receptors at the PAMF, while sensitive, are short-term receptors, and so would not be exposed to construction noise levels over the full duration of construction activities associated with the Master Plan.
- The project site and PAMF facility are adjacent to Highway 101, which dominates the noise environment. As shown in Table 3-9, typical noise levels in the vicinity of the project site are approximately 64.7 dBA L_{eq} . As described above, construction noise levels associated with the Master Plan, on average, would be approximately 62 dBA L_{eq} . While noise from construction equipment may be audible, it would not have an appreciable effect on sound levels at PAMF. Furthermore, receptors at the PAMF facility would be indoors, and the building they are located in would provide attenuation from outdoor noise levels.
- Depending on the specific location of construction equipment on-site, existing structures on site (e.g., the Operations Building) may occasionally provide temporary shielding to nearby receptors from construction noise levels.
- Construction noise levels at residential receptor locations would likely not be audible, because receptors are 700 feet from the project site, and there are numerous structures between the project site and residential receptor locations that would inhibit the transmission of construction noise to these locations.
- Construction activities would be in accordance with the Municipal Code Section 9.30.070-B, as described in further detail below.

Construction noise would be intermittent, occurring only when equipment is in operation. Consistent with Municipal Code Section 9.30.070-B, construction activities at the site would only occur between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays. Construction activities would not occur on holidays and Sundays. The timeframes in which construction noise is exempt avoid noise-sensitive nighttime hours. The noise generated from project construction would be temporary and would not produce the same sound levels every day. Construction activities would occur within the permissible timeframes identified in the City's Municipal Code and, therefore, would not conflict with any applicable standards. The proposed project would be consistent with General Plan Policy NOI-1.8.

Land Use Compatibility

The proposed project would not change the use of the site. Figure 9-1 of the City's General Plan Noise Element is intended to provide guidance for the citing of new land uses. Because the project does not propose a change in land use, the project would not have the potential to conflict with or be inconsistent with General Plan Policy NOI-1.1 and NOI-1.12.

Long-term Operational Noise Levels

Once operational, the project site would continue to generate noise from vehicular activity (e.g., employee cars, service trucks, and vendor trucks driving to and from the site), off-road equipment used to move materials around the site, vehicle maintenance activities, and stationary sources (e.g., heating, ventilation, and air conditioning (HVAC) equipment, noise from the vehicle maintenance activities). The types of noise sources and sound levels at the site under proposed conditions would be similar to existing conditions, since PG&E is not proposing to add new activities or increase operations at the site. The project is intended to provide additional structures for storage and renovate / reconstruct buildings for maintenance and operational activities.

One project component that could, however, potentially increase sound levels at adjacent properties is the new generator proposed as part of the project. Details regarding the make, model, placement on-site, and typical noise levels of the proposed generator are unknown at this time. Given the uncertainty regarding the location, size, and noise levels associated with the generator, this stationary source of noise could have the potential to conflict with the noise level standards identified in Table 9-1 of the City's General Plan Noise Element (see Table 3-10). Accordingly, the City would incorporate the following mitigation measure:

Impact NOI-1: The new generator proposed as part of the project is a stationary source of noise that could potentially conflict with the noise level standards identified in Table 9-1 of the City's General Plan Noise Element.

Mitigation Measure NOI-1: Prepare Acoustical Analysis for Emergency Back-Up Generator. Prior to issuing construction permits for the proposed back-up generator, the City shall require the project Applicant to submit an acoustical analysis to the City, prepared by a qualified firm or individual, that demonstrates sound levels generated by the emergency back-up generator is consistent and in compliance with the noise level limitations specified in Table 9-1 of the City's General Plan. The acoustical analysis shall identify, as necessary, any noise-attenuating features (e.g., enclosures) required to achieve compliance with the City's noise level standards.

Effectiveness: This measure would require the Applicant to demonstrate the sound levels generated by the project's emergency backup generator comply with City standards.

Implementation: The Applicant shall be responsible for preparing and submitting the acoustical analysis as part of its building permit application.

Timing: Prior to the issuance of construction permits for the emergency back-up generator.

Monitoring: The City shall verify the acoustical analysis demonstrates the back-up generator complies with City noise level standards.

The implementation of Mitigation Measure NOI-1 would require the Applicant to demonstrate the proposed back-up generator complies with applicable City noise level standards. As noted previously, operational noise from other sources would be similar to those associated with the existing land use, though they may occur in different locations on-site.

Policy NOI-1.2 contained in the City's General Plan Noise Element requires projects to minimize noise impacts on noise-sensitive land uses. Incorporating the above mitigation measure into the project would ensure that the proposed project would not result in substantial, permanent increase in noise levels in proximity of the project site, and that the proposed project would not conflict with any applicable noise standards. This impact would be less than significant with mitigation incorporated.

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

Less Than Significant Impact. Vibration is the movement of particles within a medium or object such as the ground or a building. As is the case with airborne sound, groundborne vibrations may be described by amplitude and frequency. Vibration amplitudes are usually expressed in peak particle velocity (PPV) or root mean squared, in inches per second (in/sec). PPV represents the maximum instantaneous positive or negative peak of a vibration signal and is most appropriate for evaluating the potential for building damage. Human response to groundborne vibration is subjective and varies from person to person. Caltrans' Transportation and *Construction Vibration Guidance Manual* provides a summary of vibration criteria that have been reported by researchers, organizations, and governmental agencies (Caltrans, 2018). Chapters six and seven of this manual summarize vibration detection and annoyance criteria from various agencies and provide criteria for evaluating potential vibration impacts on buildings and humans from transportation and construction projects. These thresholds are summarized in Table 3-12 and Table 3-13.

Table 3-12: Caltrans' Vibration Criteria for Building Damage

Structural Integrity	Maximum PPV (in/sec)	
	Transient	Continuous
Extremely fragile buildings, ruins, monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some older buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial and commercial structures	2.00	0.50
Source: Caltrans, 2018		

Table 3-13: Caltrans' Vibration Criteria for Human Response

Human Response	Maximum PPV (in/sec)	
	Transient	Continuous
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severely perceptible	2.00	0.40
Source: Caltrans, 2018		

Development of the proposed project would not require rock blasting, or pile driving, but could require use a vibratory roller, large bulldozer, and loaded trucks. Construction activities that use vibratory rollers and bulldozers would be mobile and not operating at the same location for a prolonged period of time; therefore, the *transient* criteria is used.

The commercial land use located north of the site at 201 Industrial Road is the building closest to where grading and paving equipment associated with the project would be used. To evaluate potential vibration impacts, the *Modern Industrial and Commercial Structures* criteria is used. As shown in Table 3-14, the operation of a vibratory roller could generate groundborne vibration of approximately 0.098 in/sec PPV at a distance of 50 feet. Based on the criteria summarized in

Table 3-12 (i.e., modern industrial and commercial structures maximum vibration criteria of 2.00 in/sec), this would not cause damage to any structures.

Table 3-14: Groundborne Vibration Estimates

Equipment	Reference PPV at 25 feet (inches/second)	Reference Lv at 25 feet (dBV)	Estimated PPV at 50 feet (inches/second)	Estimated Lv at 50 feet (dBV)
Vibratory roller	0.21	94.0	0.098	85.0
Large bulldozer	0.089	87.0	0.042	78.0
Small bulldozer	0.003	58.0	0.014	49.0
Loaded truck	0.076	86.0	0.035	77.0
Jackhammer	0.035	79.0	0.016	70.0

Source: Caltrans, 2018, FTA, 2006.

Notes: Estimated PPV calculated as: $PPV(D) = PPV_{ref} * (25/D)^{1.1}$ where $PPV(D)$ = Estimated PPV @ Distance, PPV_{ref} = Reference PPV @ 25 feet, D = Distance from equipment to receiver, and 1.1 = ground attenuation rate

Estimated Lv calculated as: $Lv(D) = Lv(25 \text{ feet}) - 30 \log(D/25)$ where $Lv(D)$ = velocity level in decibels, and v = RMS velocity amplitude @ 25 feet

Although some construction activities may generate groundborne vibration that is slightly perceptible (i.e., between barely perceptible and distinctly perceptible thresholds for transient sources shown in Table 3-13), this impact would be less than significant for a number of reasons. First, equipment that has the potential to generate groundborne vibration would be mobile, meaning that they would not operate at the same location and expose a potential receptor to vibration for a prolonged amount of time. Second, equipment is unlikely to operate near the property boundary on a frequent basis. Instead, the equipment would likely be used on the interior of the site where the majority of construction would occur. Third, the receptors at the commercial property would be transient, meaning that they would not be subject to vibration on a frequent basis or continuously while they are at the site. Finally, equipment operation that could generate groundborne vibration would be short-term, since most activities that would have the potential to generate perceptible groundborne vibration would occur during site preparation and grading, which are only anticipated to last approximately a few weeks at any property boundary. As such, the proposed project would not generate excessive groundborne vibration or groundborne noise levels. This impact would be less than significant.

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

No Impact. The proposed project would not expose people working at the project site to excessive noise levels, as the project does not involve a change in existing land use, nor does it propose citing any additional receptors at the site. No impact would occur.

3.13.4 References

California Department of Transportation (Caltrans) 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. Sacramento, California. September 2013.

_____. 2018. *Transportation and Construction Vibration Guidance Manual*. Sacramento, California. April 2018.

City of San Carlos (San Carlos) 2009. 2030 General Plan Noise Element. Adopted October 12, 2009.

MIG 2022. 405 Industrial Road Life Science Project Initial Study / Mitigated Negative Declaration. State Clearinghouse No. 2022080187. March 2022.

U.S. Federal Highway Administration (FHWA) 2010. "Construction Noise Handbook, Chapter 9 Construction Equipment Noise Levels and Ranges." U.S. Department of Transportation FHWA. August 24, 2017. Available online at:
http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm.

U.S. Federal Transit Administration (FTA) 2006. *Transit Noise and Vibration Assessment*. FTA-VA-90-1003-06. Washington, DC. May 2006.

3.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Induce a substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.14.1 Environmental Setting

The project site has been developed with the PG&E Service Center since the 1970's. The San Carlos service center currently serves the greater San Carlos area and acts as the main hub for emergency services for the greater region for gas & electric utility service needs. Approximately 356 people currently work at the site. See Project Description for a more detailed description of existing site development.

According to the U.S. Census Bureau most recently available data from 2022, the City of San Carlos has a population of approximately 29,586 including 11,361 households (U.S. Census Bureau 2024). The City's population is projected to reach 35,250 by the year 2040 (MTC/ABAG 2018).

3.14.2 Regulatory Setting

Local Regulations

Plan Bay Area 2050

Plan Bay Area 2050, adopted in 2021, is the Metropolitan Transportation Commission's (MTC) and Association of Bay Area Government's (ABAG) regional, long-range planning document for the San Francisco Bay Area. *Plan Bay Area 2050* outlines strategies for growth and investment through the year 2050, while simultaneously striving to meet and exceed federal and state requirements. *Plan Bay Area 2050* does not fund projects or change local policies, rather, it includes actions for future investment in infrastructure, housing, public transportation systems, and resilient environments, and lays out public policies necessary to realize a future growth pattern for housing and jobs. *Plan Bay Area 2040*, adopted in 2017, was the previous iteration of Plan Bay Area, and included employment and household projections through 2040.

City of San Carlos General Plan

The City of San Carlos General Plan Land Use Element contains the following policy related to population and housing:

Policy LU-5.6 Strive for a balanced ratio of jobs and housing units.

3.14.3 Discussion

Would the project:

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

No Impact. The proposed project would involve replacing the San Carlos service center's aged Fleet Maintenance and Shops buildings with new buildings; renovating the interior of the existing Operations building; constructing a new Materials Storage building and new accessory structures; and constructing site improvements, including an improved stormwater management system. The site would continue to employ the same number of employees, which consists of approximately 356 people. Therefore, the project would not result in new jobs and additional employees. The proposed project also does not include the construction of infrastructure or roads which could indirectly induce additional population growth. The project would have no impact on population growth.

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

No Impact. The project site does not contain any residential units and would not displace housing or people or necessitate the construction of replacement housing elsewhere. No impact would occur.

3.14.4 References

- Metropolitan Transportation Commission / Association of Bay Area Governments (MTC/ABAG). 2017. *Plan Bay Area 2040 Land Use Modeling Report*. July 2017. Accessed January 25, 2022 at http://2040.planbayarea.org/files/2020-02/Land_Use_Modeling_PBA2040_Supplemental%20Report_7-2017.pdf.
- _____. 2021. *Plan Bay Area 2050 Forecasting and Modeling Report*. October 2021. Accessed January 25, 2022, at https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_Forecasting_Modeling_Report_October_2021.pdf.
- U.S. Census Bureau. 2022. QuickFacts, San Carlos city, California; United States. Accessed April 30, 2024, at <https://www.census.gov/quickfacts/fact/table/sancarloscitycalifornia/INC110222>.

3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.15.1 Environmental Setting

Public service providers in San Carlos that would serve the proposed project include the following:

- San Carlos and Redwood City Fire Department (RC-SCFD), a joint powers and governmental agency, provides fire and emergency response services to the cities of San Carlos and Redwood City. The closest fire station to the project site is San Carlos Fire Station 13, located at 525 Laurel Street, San Carlos which is owned by the City of San Carlos and operated by the Redwood City Fire Department under a contractual agreement between the City of Redwood City and the City of San Carlos.
- The San Carlos Police Bureau, a division of the San Mateo County Sheriff's Office, provides police protection services in the City. The closest police station to the project site is located at 600 Elm Street in San Carlos.
- The project site is within the boundaries of the San Carlos School District and the Sequoia Union High School District. The schools closest to the project site are Central Middle School, located approximately 1.0 mile south of the project site, and Arroyo School, located approximately 1.0 mile south of the project site.
- The San Mateo County library district governs and administers 12 community libraries. The closest library to the project site is the San Carlos Library located at 610 Elm Street approximately 0.8 mile south of the project site.
- The City of San Carlos Department of Parks and Recreation owns and manages 16 parks. The closest park to the project site is Laureola Park located approximately 0.4 mile southwest of the project site (Google Earth Pro 2022).

3.15.2 Discussion

Would the project:

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

altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- i) Fire protection?**
- ii) Police?**
- iii) Schools?**
- iv) Parks?**
- v) Other public facilities?**

Less than Significant Impact (Responses i - v). The proposed project would have a significant environmental impact if it would exceed the ability of fire and emergency medical responders and law enforcement to adequately serve the project site, thereby requiring construction of new facilities or modification of existing facilities, the construction of which could cause significant environmental impacts. The proposed project would not result in an increase in the San Carlos population and therefore would not generate impacts on local schools, parks, libraries, or other public facilities.

Once construction is complete, the project would continue to employ the same number of employees, which consists of approximately 356 people. The project would not result in adverse impacts to government facilities, nor would it adversely impact public service ratios, response times or other public service objectives. Fire service delivery in San Mateo County is borderless and therefore other fire departments service other cities as needed. San Carlos Fire Station 13, located at 525 Laurel Street, San Carlos, is owned by the City of San Carlos and operated by the Redwood City Fire Department under a contractual agreement between the City of Redwood City and the City of San Carlos. This station is the closest fire station to the project site, located approximately 0.5 miles to the southwest. The proposed project is not expected to result in an increased need for fire protection services or increased number and frequency of calls for service to the RC-SCFD.

The proposed project would not increase the number of persons and level of activity on the project site, and it is reasonable to expect that the proposed project would not result in a meaningful increase in the amount of crime in the project vicinity. As such, the proposed project is not anticipated to have any impact on police services and response times.

The proposed project involves replacing existing buildings; it does not propose new residential dwelling units, or other infrastructure that would induce population growth beyond that already planned for; therefore, the proposed project would not impact schools, libraries, or other public facilities. This impact would be less than significant.

3.15.3 References

City of San Carlos. 2024. San Carlos and Redwood City Fire Department web page. Accessed on April 30, 2024, at https://www.cityofsancarlos.org/city_hall/departments_and_divisions/fire/index.php.

Google Earth Pro. 2024. Accessed on April 30, 2024

3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.16.1 Environmental Setting

The City of San Carlos Department of Parks and Recreation is responsible for the maintenance of the City's 16 parks within the city limit (San Carlos 2009). The City of San Carlos has adopted a parkland dedication standard of 2.5 acres of parkland for every 1,000 residents. There are a total of approximately 62.5 acres of existing traditional developed parkland in San Carlos, or approximately 2.11 acres per 1,000 residents, based on an existing population of 29,586 people in 2022.

Regional park facilities operated by the Midpeninsula Regional Open Space District (MROSD) and San Mateo County Parks could be used by residents of the project site. The closest MROSD parks to San Carlos are Pulgas Ridge Open Space, Purisima Creek Redwoods, and Teague Hill. San Mateo County Parks manages five regional parks. The largest is the 467-acre Edgewood Preserve, located approximately three miles south of San Carlos. The California Department of Fish and Wildlife runs Bair Island, a 1,985-acre Ecological Preserve within the Don Edwards National Wildlife Refuge, located adjacent to the San Carlos in the wetlands of San Francisco Bay. Open space within San Carlos includes Bic Canyon Park, Eaton Park, and land designated as open space in the General Plan.

3.16.2 Discussion

Would the project:

- a) **Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?**
- b) **Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact (Responses a) and b)). There are no parks or recreational facilities within the immediate vicinity of the project site; the closest recreational facility is Laureola Park, approximately 0.4 miles south of the project site. The proposed project would not increase employees working at the site and would not increase the usage of existing parks in the project vicinity. The project has no impact on recreational facilities.

3.16.3 References

City of San Carlos, 2009. San Carlos 2030 General Plan. October 2009. Accessed April 30, 2024, at <https://www.cityofsancarlos.org/government/departments/community-development/planning/plans-document-library/general-plan>.

3.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.17.1 Environmental Setting

On July 1, 2020, an assessment of vehicle miles traveled (VMT) associated with land use projects became the metric by which transportation impacts are assessed under CEQA. Prior to July 1, 2020, Level of Service (LOS) standards, or the amount of delay automobiles would cause, were commonly used by Lead Agencies to assess transportation impacts.

VMT is the total miles of travel by personal motorized vehicles a project is expected to generate in a day. VMT measures the full distance of personal motorized vehicle-trips with one end within the project.

To estimate the number of vehicles operating out of the project site, 24-hour driveway counts were collected from all eight ingress/egress points along Industrial Road on April 3, 2024. The traffic counts collected data on all vehicles entering and exiting the project site which generally included employee passenger vehicles, fleet service vehicles, and vendor vehicles. During the 24-hour traffic count period the San Carlos Service Center had 547 vehicles enter the site, and 572 vehicles exit the site.

3.17.1 Regulatory SettingLocal Regulations*San Carlos Municipal Code*

Chapter 18.25 “Transportation Demand Management” of the Municipal Code outlines the TDM objectives for the City. The requirements of Chapter 18.25 apply to:

- A. New multi-unit development of ten units or more;
- B. New nonresidential development of ten thousand square feet or more;
- C. Additions to nonresidential buildings that are ten thousand square feet or more in size that expand existing gross floor area by ten percent or more; and
- D. Establishment of a new use, change of use, or change in operational characteristics in a building that is ten thousand square feet or more in size that results in an average

daily trip increase of more than ten percent of the current use, based on the most recent Institute of Traffic Engineers (ITE) trip generation rates

Projects subject to the requirements of Chapter 18.25 must incorporate measures to meet vehicle trip generation rates that are twenty percent lower than the standard rates as established in the most recent edition of the Institute of Transportation Engineers (ITE) trip generation manual. As described in section 3.17.2 below, the project was evaluated for how many new trips would be generated by the proposed project. The project was determined to not generate enough trips to trigger the City's Transportation Study thresholds to require additional analysis that would result in the requirement of a TDM plan.

3.17.2 Discussion

Would the project:

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

No Impact. The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. As described under response b), the proposed project would be granted a variance that would allow the project an exemption from the City's VMT policy and TDM requirements. The project does not propose to add any vehicle trips compared to existing conditions.

Both vehicular parking and bicycle parking provided by the project would be consistent with the City's policies. The project would provide 537 regular vehicular parking spaces and 35 EV parking spaces for a total of 572 parking spaces (for service vehicles and employees), which exceeds the City's parking standards for the site's land use by 59 spaces (Municipal Code Section 18.20.040-A (3)). The proposed project would also provide approximately 27 long-term bicycle parking spaces, consisting of four bike rack spaces, six bike lockers that hold 12 bikes, and 11 bike spaces inside the Operations building, which would meet City requirements (Municipal Code Section 18.20.080).

The project site would continue to provide continuous non-vehicular transportation infrastructure via the sidewalk that borders the project site along Industrial Road. The project proposes the construction of accessible pathways between the Fleet building, Logistics Warehouse & Shops building, Operations building, and Industrial Road to provide pedestrian infrastructure internally within the site between the main site facilities. The project does not propose any off-site changes to transportation infrastructure. The proposed project would not conflict with a program, plan, ordinance, or policy addressing the City's circulation system. No impact would occur.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles traveled?

Less Than Significant Impact. On September 27, 2013, California Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes include elimination of automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. According to SB 743, these changes are intended to "more appropriately balance the needs of congestion management with Statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

In December 2018, the Governor's Office of Planning and Research (OPR) completed an update to the *State CEQA Guidelines* to implement the requirements of SB 743. The *State CEQA Guidelines* state that vehicle miles traveled (VMT) must be the metric used to determine

significant transportation impacts. The Guidelines require all lead agencies in California to use VMT-based thresholds of significance in CEQA documents published after July 1, 2020.

The City of San Carlos has adopted a VMT policy that includes screening criteria for evaluating a project's VMT impact. According to the San Carlos VMT policy, the following types of projects have a less than significant VMT impact:

- Small projects (i.e., fewer than 100 trips per day)
- Projects in low VMT areas
- Projects near transit (i.e., within ½ mile walkshed of the San Carlos Caltrain Station of El Camino Real)

The project site would continue to be used as a PG&E service center and would not result in any changes to the existing activities on site. As stated above, currently, 547 vehicles enter the site, and 572 vehicles exit the site per day on weekdays. The project does not propose to add jobs or increase the number of employees on site. The project does not introduce new activities or functions at the site. For these reasons, the project would add fewer than 100 vehicle trips per day compared to existing conditions. The project would have a less-than-significant VMT impact.

San Carlos Municipal Code Chapter, 18.25 establishes the City's Transportation Demand Management (TDM) requirements, which include:

- Requirements to reduce the amount of traffic generated by new development and the expansion of existing development
- TDM measures to promote more efficient utilization of existing transportation facilities and ensure that new developments are designed in ways to maximize the potential for alternative transportation usage
- Requirements to monitor and enforce a TDM plan to ensure that the City's desired alternative mode use percentages are achieved

Section 18.25.020 of the Municipal Code includes the criteria for determining whether a development is required to participate in the TDM Program, as listed below:

- A. New multi-unit development of ten units or more;
- B. New nonresidential development of ten thousand square feet or more;
- C. Additions to nonresidential buildings that are ten thousand square feet or more in size that expand existing gross floor area by ten percent or more; and
- D. Establishment of a new use, change of use, or change in operational characteristics in a building that is ten thousand square feet or more in size that results in an average daily trip increase of more than ten percent of the current use, based on the most recent Institute of Traffic Engineers (ITE) trip generation rates.

The proposed project meets Requirement C of the City's screening criteria because it proposes to expand the existing gross floor area on site by approximately 165 percent. The project is therefore required to prepare a project TDM Plan that incorporates measures to meet vehicle trip generation rates that are 20 percent lower than the standard rates as established in the most recent edition of the Institute of Transportation Engineers (ITE) trip generation manual.

The project applicant is requesting a variance to the requirements of Sections 18.25.020 and 18.25.030 of the San Carlos Municipal Code because the project does not propose to change the trip generation rates of the existing service center (or increase VMT). The City has considered the applicant's request for a variance with Sections 18.25.020 and 18.25.030 of the Municipal Code and intends to approve the request. The City reviewed the Applicant's trip generation calculations and driveway counts in conjunction with the project's proposed uses and determined the project would not generate enough trips to trigger the City's Transportation

Study thresholds requiring LOS or VMT calculations. The project Applicant is still required to provide a C/CAG TDM checklist prior to project planning approvals (Email correspondence with Chris Dacumos 2024).

As concluded above, the project would have a less than significant VMT impact because the project would add fewer than 100 new vehicle trips per day. With the City's approval of the requested variance with the Municipal Code Chapter 18.25 TDM Plan requirements, the project would not be required to achieve a reduction in vehicle trip generation rates and, therefore, the project would not conflict with the City's TDM Plan requirements. This impact would be less than significant.

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

No Impact. The proposed project would not increase hazards due to a geometric design feature or incompatible uses. The project driveways that currently connect to Industrial Road would be maintained under implementation of the proposed project. The existing driveways provide adequate sight distance looking toward both northbound and southbound traffic. The proposed project would continue to generate primarily employee, fleet service vehicle, and vendor trips. Fleet service vehicle trips and vendor trips would not be incompatible with the driveways' design. The proposed project would not increase hazards due to a geometric design feature, nor would involve incompatible uses that would substantially increase hazards. No impact would occur.

d) Result in inadequate emergency access?

No Impact. The proposed project would provide continuous vehicle paths around all proposed buildings. Vehicle paths would range from 20 feet to approximately 40 feet wide at various locations throughout the site and would provide adequate aerial apparatus access to all proposed buildings (Figure 12 – Fire Access Plan). The continuous vehicle paths would be sufficient to allow emergency vehicle access throughout the project site. No impact would occur.

3.17.3 References

City of San Carlos. 2024. San Carlos Municipal Code Title 18: Zoning. Revised 4/24.

Email correspondence with Chris Dacumos, Senior Planner, Good City Company on behalf of the City of San Carlos. May 23, 2024.

3.18 TRIBAL CULTURAL RESOURCES

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

3.18.1 Environmental Setting

Assembly Bill (AB) 52 requires the CEQA lead agency consult with a California Native American Tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the Tribe requests, in writing, to be informed by the lead agency through formal notification of the proposed projects in the area. The consultation is required before the determination of whether a negative declaration, mitigated negative declaration, or EIR is required. In addition, AB 52 includes time limits for certain responses regarding consultation. AB 52 also adds “tribal cultural resources” (TCRs) to the specific cultural resources protected under CEQA. CEQA Section 21084.3 has been added, which states that “public agencies shall, when feasible, avoid damaging effects to any tribal cultural resources.” Information shared by tribes as a result of AB 52 consultation shall be documented in a confidential file, as necessary, and made part of a lead agencies administrative record. In response to AB 52, the City of San Carlos has not received any request from any Tribes in the geographic area with which it is traditionally and culturally affiliated with or otherwise to be notified about projects in the City of San Carlos.

A TCR is defined under AB 52 as a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope, sacred place, and object with cultural value to a California Native American tribe that are either included or eligible for inclusion in the California Register of Historic Resources or included a local register of historical resources, or if the City of San Carlos, acting as the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a TCR.

As stated in Section 3.5, Cultural Resources, a California Historical Resources Information System (CHRIS) search through the Northwest Information Center (NWIC) was conducted. The search was completed on May 8, 2023. None of the existing reports received through the CHRIS search identified known tribal resources in the vicinity of the proposed project.

A Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC) was also conducted. The search was initiated on April 4, 2023, and was returned with negative results on April 12, 2023, indicating no known tribal resources within 0.25 miles of the project site. Tribal representatives were contacted by email and certified mail on June 15, 2023, using the NAHC's contact list from a recent nearby project. MIG considers that due diligence has been completed by contacting all the tribal representatives identified by the NAHC for the proposed project. No responses from any of the tribes contacted were received. MIG considers that due diligence has been completed by contacting all the tribal representatives identified by the NAHC for the proposed project. MIG understands that as the SLF search was negative and no tribe responded to the request, there are no known tribal resources in the project area that have the potential to be impacted by the project.

3.18.2 Regulatory Setting

Federal Regulations

Native American Graves Protection and Repatriation Act of 1990

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

State Regulations

California Environmental Quality Act

Pursuant to CEQA, a historical resource is a resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR). In addition, resources included in a local register of historic resources or identified as significant in a local survey conducted in accordance with state guidelines are also considered historic resources under CEQA, unless a preponderance of the facts demonstrates otherwise. Per CEQA, the fact that a resource is not listed in or determined eligible for listing in the CRHR or is not included in a local register or survey shall not preclude a Lead Agency, as defined by CEQA, from determining that the resource may be a historic resource as defined in California Public Resources Code (PRC) Section 5024.1. CEQA applies to archaeological resources when (1) the archaeological resource satisfies the definition of a historical resource or (2) the archaeological resource satisfies the definition of a "unique archaeological resource." A unique archaeological resource is an archaeological artifact, object, or site that has a high probability of meeting any of the following criteria:

1. The archaeological resource contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
2. The archaeological resource has a special and particular quality such as being the oldest of its type or the best available example of its type.

3. The archaeological resource is directly associated with a scientifically recognized important prehistoric or historic event or person.

Health and Safety Code, Sections 7050 and 7052

Health and Safety Code Section 7050.5 declares that, in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbances must cease, and the county coroner must be notified. Section 7052 establishes a felony penalty for mutilating, disinterring, or otherwise disturbing human remains, except by relatives.

Penal Code Section 622.5

Penal Code Section 622.5 provides misdemeanor penalties for injuring or destroying objects of historic or archaeological interest located on public or private lands but specifically excludes the landowner.

Government Code Section 6254(r)

Government Code explicitly authorizes public agencies to withhold information from the public relating to Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission.

Native American Heritage Commission, Public Resources Code Sections 5097.9 – 5097.991

Section 5097.91 of the Public Resources Code (PRC) established the Native American Heritage Commission (NAHC), whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.9 of the PRC, a state policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Native American Graves Protection and Repatriation Act of 2001

Codified in the California Health and Safety Code Sections 8010–8030, the California Native American Graves Protection Act (NAGPRA) is consistent with the federal NAGPRA. Intended to “provide a seamless and consistent state policy to ensure that all California Indian human remains and cultural items be treated with dignity and respect,” the California NAGPRA also encourages and provides a mechanism for the return of remains and cultural items to lineal descendants. Section 8025 established a Repatriation Oversight Commission to oversee this process. The act also provides a process for non–federally recognized tribes to file claims with agencies and museums for repatriation of human remains and cultural items.

Assembly Bill 52

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requests in writing to the lead agency, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation, prior to determining whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a project.

Local Regulations

San Carlos General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following relevant archaeological resources policies and actions are from the General Plan's Land Use Element.

- **Policy LU-12.1:** Evaluate historical and cultural resources early in the development review process through consultation with interested parties.
- **Policy LU-12.5:** Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.
- **Action LU-12.1:** Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural and historical resources.

3.18.3 Discussion

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated (Responses i and ii). As discussed under criteria (b) and (c) in Section 3.5, Cultural Resources, there no known archeological resources, ethnographic sites, or Native American remains located on the project site. As discussed under criteria (b) and (c) in Section 3.5, ground-disturbing activities associated with development of the proposed project could have the potential to uncover and damage or destroy unknown resources, including tribal cultural resources, in sub-surface soils. The City would implement Mitigation Measures CUL-1 through CUL-3 to reduce these potential impacts. Implementation of these mitigation measures reinforces compliance with State and federal regulations, as well as provides protections for Native American objects that have potential to be considered TCRs but are not otherwise considered significant under CEQA. This impact would be less than significant with mitigation incorporated.

3.18.4 References

- _____. 2009. San Carlos 2030 General Plan General Plan. Adopted October 12, 2009.
- _____. 2017. History of San Carlos, <https://www.cityofsancarlos.org/residents/about-san-carlos/san-carlos-history/-fsiteid-1>, accessed August 23, 2023.
- _____. 2022. 405 Industrial Road Project Initial Study Checklist. August 9, 2022.

Native American Heritage Commission (NAHC). 2023. Unpublished letter containing search results from Sacred Lands File search. Kept on file at NAHC and with MIG, Inc.

Northwest Information Center (NWIC). 2023. File No. 22-1569. Unpublished confidential report containing search results from site specific survey. Kept on file at NWIC and with MIG, Inc.

3.19 UTILITIES AND SERVICE SYSTEMS

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

3.19.1 Environmental Setting

Water

Water service is provided to the project site by the Mid-Peninsula Water District (MPWD). Water consumption at the service center is primarily used in the Operations building to support office uses and in the Fleet Maintenance building for vehicle maintenance and cleaning activities, and landscaping irrigation.

Wastewater

The San Carlos Public Works Department provides wastewater collection and treatment service for San Carlos. The City owns and operates a sanitary sewer collection system consisting of approximately 104 miles of sewer pipelines and 6 sewer lift stations (City of San Carlos 2024a). Sanitary wastewater generated on the project site would be treated by the Silicon Valley Clean Water (SVCW), at the Silicon Valley Clean Water Wastewater Treatment Plant (SVCW WWTP) in Redwood City. SVCW has completed its 2024 Capital Improvement Program (CIP) Update, which includes projects related to the WWTP and the SVCW conveyance system, which includes remote pump stations, transmission sewer pipelines (e.g., influent force main, Belmont force main, tunnel and gravity sewer), and effluent outfall. Future treatment for nutrients as required by the Regional Water Quality Control Board is also included in the CIP Update (SVCW 2024). The SVCW WWTP has the capacity to treat 29 mgd and in 2020 received an

average of approximately 12.62 mgd of flows per day from customers in the SVCW service area (MPWD 2020).

Stormwater Drainage

The City of San Carlos provides stormwater drainage service to the project site. The City maintains approximately 56 miles of stormwater drainage pipelines and channels and three pump stations (City of San Carlos 2024b). Developers and property owners are responsible for extending the existing stormwater drainage system onto a property and tying into the City's stormwater infrastructure when new development or redevelopment occurs.

Solid Waste

Solid waste and recyclables are collected within the city by a provider contracted through the South Bayside Waste Management Authority (SBWMA). San Carlos' solid waste and recyclables are initially taken to the Shoreway Recycling and Disposal Center (SRDC) and then to Ox Mountain Landfill in Half Moon Bay.

Electricity and Gas

Electricity and natural gas would be provided to the project site by Peninsula Clean Energy (PCE) and Pacific Gas and Electric (PG&E), respectively. PCE is San Mateo County's Community Choice Aggregate (CCA), a community-controlled, not-for-profit joint powers agency. PCE procures the sources of electricity throughout San Mateo County, while PG&E, the project applicant, manages and maintains the electrical infrastructure used to supply consumers with electricity.

3.19.2 Regulatory Setting

State Regulations

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert from the landfill at least 50 percent of solid waste generated beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 (2011) sets forth the requirements of the statewide mandatory commercial recycling program for businesses that generate four or more cubic yards of commercial solid waste per week and multi-family dwellings with five or more units in California. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill 1826

AB 1826 (2014) sets forth the requirements of the statewide mandatory commercial organics recycling program for businesses and multi-family dwellings with five or more units that generate two or more cubic yards of commercial solid waste per week. AB 1826 sets a statewide goal for 50 percent reduction in organic waste disposal by the year 2020.

Senate Bill 1383

SB 1383 (2016) establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of

currently disposed edible food is recovered for human consumption by 2025. On January 1, 2022, CalRecycle's regulations to meet the organic waste reduction targets for 2025 took effect and became enforceable.

California Green Building Standards Code Compliance for Construction, Waste Reduction, Disposal and Recycling

In January 2010, the State of California adopted the California Green Building Standards Code ("CALGreen"), establishing mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 65 percent of nonhazardous construction and demolition ("C&D") debris, or meeting the local construction and demolition waste management ordinance, whichever is more stringent (see San Carlos-specific CALGreen building code requirements below); and
- Providing readily accessible areas for recycling by occupants.

Local Regulations

San Carlos Climate Mitigation and Adaptation Plan

The San Carlos CMAP includes a goal to transform San Carlos into a zero-waste community. The CMAP includes waste reduction strategies geared toward City operations and public events, waste haulers, and construction contractors, and actions that encourage community material reuse and repairs programs, compostable food service ware, increased composting, improved recycling, and sustainable food consumption. CMAP strategies aimed at reducing construction and demolition waste include:

- Incentivize the recycling of construction debris by working with regional partners.
- Research and consider providing financial incentives to encourage the recycling of construction debris.
- Determine how certain construction materials may be donated and reused to help those in need by working with local community-based organizations and construction companies.

San Carlos Recycling and Diversion of Construction and Demolition Debris Ordinance

Chapter 8.05 of the San Carlos Municipal Code requires projects that qualify for coverage under CALGreen that generate waste comprised of mixed debris, including both structural debris (e.g., wood, metal, wallboard) and inert materials (dirt, asphalt, brick, and/or cinderblock), to divert at least 60 percent of all generated tonnage. All project applicants are required to submit a properly completed "waste management plan" (WMP) to the City Department of Planning and Building's WMP Compliance Official, as a portion of the building or demolition permit process. The completed WMP must indicate, at minimum, all of the following:

- The estimated volume or weight of project construction and demolition debris, by materials type, to be generated;
- The maximum volume or weight of such materials that can feasibly be diverted via reuse or recycling;
- The vendor or facility that the applicant proposes to use to collect or receive that material; and

- The estimated volume or weight of construction and demolition debris that will be land filled.

Project contractors are required to keep records in tonnage or in other measurements approved by the WMP Compliance Official. Project applicants must also pay an administrative fee and submit a deposit for each estimated ton of construction and/or demolition debris that equals no less than one thousand dollars (the deposit). The deposit is returned to the project applicant upon proof to the satisfaction of the WMP Compliance Official that no less than the required percentages of the waste tonnage of construction and demolition debris generated by the project have been diverted from landfills and have been recycled or reused or stored for later reuse or recycling.

San Carlos General Plan

The San Carlos 2030 General Plan was adopted in 2009. The following relevant utilities policies are from the General Plan's Land Use Element, Environmental Management Element, and Community Safety and Services Element.

Water

- **Policy EM-5.3:** Promote the conservation and efficient use of water in new and existing residences and by commercial and industrial consumers.
- **Policy EM-5.4:** Encourage the use of drought-tolerant plants and efficient watering techniques for all City landscaping.
- **Policy EM-5.5:** Recycled water distribution system (purple pipe) should be used for landscaping and other non-potable water uses for residential, commercial and industrial customers, where technically and financially feasible.
- **Policy EM-5.8:** Work with water service providers to provide high quality domestic water.
- **Policy EM-5.10:** Require the evaluation of potential groundwater depletion that could occur from new development through dewatering.

Wastewater

- **Policy LU-4.5:** Annexation of developed parcels shall be in substantial compliance with the following criteria:
 - a. The parcels are contiguous to parcels located in the City of San Carlos and contiguous to city streets.
 - b. The parcels are connected to the city's sanitary sewer system or can be connected to the city's sewer to the satisfaction of the City Engineer.
 - c. The structures on the parcels shall comply with the Building Codes in effect at the time the structures were constructed. A Code Compliance evaluation prepared by a licensed Civil Engineering or Architect shall be submitted to the San Carlos Building Department for review and approval prior to annexation.
- **Policy LU-4.7:** Prior to annexation of parcels, public services and facilities meeting City standards shall be installed or provisions for their installation shall have been made to the satisfaction of the City Engineer. Public services and utilities include:
 - a. Construction and acceptance of improvements shall be completed prior to issuance of Building Permits or sewer connections.
 - b. Construction of streets meeting City subdivision street standards from the terminus of city streets currently meeting City standards to and throughout the subdivision. Where possible and appropriate and subject to environmental, health and safety considerations, rural road standards shall apply. Assessment districts may be used by the developer for installation of portions of the street

which is the responsibility of the owner of abutting unimproved lands at the time their development.

- **Policy EM-5.1:** Reduce the discharge of toxic materials into the city's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).
- **Policy EM-5.9:** Sewer service may be extended outside the city limit only as required to protect public health due to failing septic systems in accordance with the following policies:
 - Extension of sewer service would be denied if there is insufficient capacity in the wastewater collection system.
 - No change to the land use would occur.
 - The extension of sewer service could not be used to enable further subdivision.
 - The property owner would be required to annex as such time as a complete consolidation of properties could be annexed.
 - The property owner would be required to complete all improvements necessary to meet City building and engineering standards.
 - Applicant to assure payment of all sewer connection, plan checking and inspection fees.

Stormwater Drainage

- **Policy EM-5.1:** Reduce the discharge of toxic materials into the city's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).
- **Policy EM-5.2:** Promote the use of less toxic household and commercial cleaning materials.
- **Policy EM-5.6:** Continue public education programs on water issues working with water service providers, local non-profits and other environmental organizations, including conservation measures and BMPs for residents, businesses, contractors and City employees.
- **Policy EM-5.7:** Encourage site designs that manage the quantity and quality of storm water run-off.
- **Policy CSS-2.1:** Improve and maintain City storm drainage infrastructure in a manner that reduces flood hazards.
- **Policy CSS-2.2:** Maintain a healthy riparian corridor in City-maintained flood control channels to reduce the risk of flooding due to erosion, siltation, blockage and heavy undergrowth.
- **Policy CSS-2.3:** Maintain a strong and enforceable Stream Development and Maintenance Ordinance for all city creeks and their tributaries.
- **Policy CSS-2.4:** Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.
- **Policy CSS-2.8:** Coordinate with neighboring jurisdictions on approaches to flooding and creek maintenance.
- **Policy CSS-2.12:** Incorporate stormwater drainage systems in development projects to effectively control the rate and amount of runoff, so as to prevent increases in downstream flooding potential.

Solid Waste

- **Policy EM-12.1:** Work with the local waste management authority to increase community diversion of solid waste that meets or exceeds the targeted rate in the Climate Action Plan.

- **Policy EM-12.2:** Minimize City government waste by expanding reduction, recycling and composting programs and practicing reuse.
- **Policy EM-12.3:** Encourage the public and private sectors to utilize reusable, returnable, recyclable, environmentally-friendly products and repairable goods through incentives, educational displays and activities, as well as City purchasing policies and practices.

3.19.3 Discussion

Would the project:

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

Less than Significant Impact. The project site is in a developed area served by existing utilities, and the proposed project would not significantly increase utility usage. No new or expanded off-site facilities would be required to serve the project. The proposed project would require new connections to existing facilities and would construct new on-site storm water treatment and retention facilities, as described below. Installation of these new connections and construction of on-site improvements could result in short-term environmental effects during construction. However, there would be no impacts over the long-term and best management practices (BMPs) and mitigation measures, as described in other sections of this Initial Study checklist, would avoid significant impacts during construction. The proposed on-site stormwater treatment and retention facilities would have long-term beneficial effects to the environment by reducing the amount of water runoff and pollutants exiting the site.

Water Supply

The project requires new potable water connections for fleet vehicle and equipment maintenance, domestic use, and fire water service. Implementation of the proposed project would require the installation of/improvements to water infrastructure on the property:

- Install 1" domestic water point of connection for new Logistics Warehouse & Shops.
- Connect 125 linear feet of new domestic water line to serve Logistics Warehouse & Shops building to existing water line that connects the existing Shops building location with water main in Industrial Road.
- Convert existing 2" water stub that serves the existing Shops building to a new point of connection for the new Fleet building.
- Install new fire department connections on new Logistics Warehouse & Shops building, Fleet building, and Material building.
- Install new fire water points of connection for new Logistics Warehouse & Shops building and Fleet building.
- Reconnect proposed 8" fire water line that would serve the Logistics Warehouse & Shops building to existing pressurized fire water line that runs from Industrial Road to the location of the existing Shops building.
- Reconnect proposed 8" fire water line that would serve the Material Storage building to existing pressurized fire water line that runs east of the Operations building.
- Convert existing fire water stub to a new point of connection for new Fleet building.
- Replace existing fire water backflow preventer with new backflow preventer at point of connection with water main in Industrial Road.

Existing water supply facilities would not need to be relocated or expanded to serve the project. This impact would be less than significant.

Sanitary Sewer Service

Sanitary sewer service would continue to be provided by the City of San Carlos and treated at the SVCW WWTP. Implementation of the proposed project would require the following installation of/improvements to sewer infrastructure on the property:

- Connect existing 4" sanitary sewer line that runs from the existing Shops building to Industrial Road to new 6" sanitary sewer line that would serve the Logistics Warehouse & Shops building.
- Install new 6" sanitary sewer point of connection for Logistics Warehouse & Shops building.
- Convert existing 4" sanitary sewer stub serving existing Shops building to new point of connection for Fleet building.
- Excavate and install new, 122 linear feet of trench drain and 24 linear feet of 6" sanitary sewer line connections to sanitary sewer pipe in new gas and electrical materials open storage area.

The project would construct one tie-in location to an existing 27-inch sanitary sewer mainline in Industrial Road. No other new or expanded wastewater facilities would be required for the project. The proposed project would not require upsizing of any City sewer pipes. The existing wastewater treatment facility that serves the site has sufficient capacity to serve the project, and no new or expanded wastewater treatment facilities are required (see response to criterion c). Impacts from the construction of new sanitary sewer infrastructure would be less than significant.

Stormwater Management

The project would construct new on-site stormwater drainage features, consistent with the C.3 provisions set by the San Francisco Bay RWQCB's MRP but would not require any new or expanded off-site stormwater drainage facilities. Stormwater runoff from the site would be directed to a series of bioretention areas and flow-through planters that allow for the treatment of stormwater before draining to either of the adjacent open drainage ditches.

The project would feature one bioretention area measuring 2,607 sq. ft. located east of the Operations building and north of the employee parking lot and a second bioretention area measuring 2,106 sq. ft. located in the southern corner of the project site south of the employee parking lot. The first set of flow-through planters totaling 2,043 sq. ft. would be located along the façade of the Logistics Warehouse & Shops building to the east. The second set of flow-through planters totaling 727 sq. ft. would be located along the northwestern façade of the Fleet building (Figure 14 – Stormwater Control Plan). As noted previously, implementation of the proposed project would result in a reduction of 25,312 sq. ft. of impervious surface area compared to existing conditions.

Implementation of the proposed project would require the following installation of/improvements to storm drain infrastructure on the property:

- Connect 22 linear feet of 6" new storm drain pipes to existing 15" storm drain pipes north of the new Fleet building.
- Install 61 linear feet of new 4" storm drain pipes to existing inlet south/southwest of the new Fleet building.
- Install new storm drain inlets north and east of the Operations building and east of the new Logistics Warehouse & Shops building.
- Connect existing 6" and 15" storm drain pipes to new storm drain inlets.

- Install 437 linear feet of trench drain in the treated pole and gas and electrical material storage areas.

Existing stormwater drainage facilities would not need to be relocated or expanded to serve the project. This impact would be less than significant.

Electricity, Natural Gas, and Telecommunications Facilities

The project would be served by existing electric power, natural gas, telephone, and internet services. Electricity and natural gas would be provided to the project site by Peninsula Clean Energy (PCE) and Pacific Gas and Electric (PG&E), respectively. PG&E would generate some electrical power on site using the proposed parking lot PV carports.

The new project buildings would be all electric. The existing Operations building would be converted to all electric energy use. All existing and new electricity utility infrastructure would be undergrounded.

Implementation of the proposed project would require the following installation of/improvements to electricity and gas infrastructure on the property:

- Relocate existing streetlights in the fleet parking lot northwest of the Operations building.
- Install new EV charging station in the fleet parking lot northwest of the Operations building.
- Install new electrical line and connect to new Fleet building.
- Connect new electrical line serving new Fleet building to existing electrical line in southeastern corner of the project site.
- Reconnect existing conduits clustered between locations of new Logistics Warehouse & Shops building and new Fleet building to proposed reroute.
- Reconnect existing electrical lines to new Fleet building.
- Relocate existing fueling equipment in fleet parking lot located northwest of Operations building.
- Make electrical line improvements to use the electricity generated by the PV carports on site.

Existing electric power, natural gas, and telecommunications facilities would not need to be relocated or expanded to serve the project. This impact would be less than significant.

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

Less Than Significant Impact. Sufficient water supply would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. The water demand created by the project and reasonably foreseeable future development in the project area, and water supply and management in the project area are discussed below.

Water Demand

The proposed project would consume potable water for fleet vehicle and equipment maintenance activities, domestic use, and irrigation of landscaping. The project would use recycled water in the Fleet building's covered wash bay where wash-off from cleaning service vehicles would be collected, cleaned, and reused in the wash bay to reduce water use. The proposed project would not result in any changes to the existing activities on site and would not result in new jobs or an increase the number of employees on site. The estimated demand for water at the project site may increase slightly but would not vary significantly from existing

conditions. Therefore, the existing water system infrastructure has adequate capacity to serve the proposed project. The project applicant is required to coordinate with the San Carlos and Redwood City Fire Department to ensure the project will provide the minimum required fire flow for manual fire suppression on site.

The project area is already heavily developed. Therefore, reasonably foreseeable future development is minimal in the project area and limited to redevelopment of sites that already have an existing demand for water supply. Therefore, reasonably foreseeable development in the project area is not expected to significantly increase the demand for water in the project area.

Water Supply and Management

Water supply and demand information is provided in the 2020 Urban Water Management Plan (UWMP) for the MPWD. The MPWD purchases its entire water supply from the San Francisco Public Utilities Commission (SFPUC). SFPUC's regional water conveyance system (RWS) supplies consist of surface water imported from the Sierra Nevada near the Hetch Hetchy project and local surface water from the San Francisco Bay Region (MPWD 2020). MPWD's long-term contract with SFPUC does not limit daily or monthly water purchases and use. MPWD's total contractual Individual Supply Guarantee (ISG) allocation from SFPUC is 3.891 mgd for an average day or 1,420.22 MG per year. MPWD receives its SFPUC supplies as part of the Bay Area Water Supply & Conservation Agency's (BAWSCA) wholesale supply allocations to the San Francisco Bay Area region.

To evaluate its supply reliability, SFPUC closely monitors the hydrologic conditions impacting its watersheds in the Sierras and the San Francisco Bay Area. Based on hydrologic conditions, SFPUC routinely provides updates about its water supply that may impact water supply for BAWSCA agencies. Unlike previous SFPUC water supply reliability forecasts that were mostly focused on hydrologic conditions and projects that impacted infrastructure, in January 2021 SFPUC provided BAWSCA with two scenarios for forecasts: "with Bay Delta Plan", ("with BDP"), and "without BDP" (they were presented by SFPUC as: Scenario 1 and Scenario 2, respectively) for the reliability of its water supply and used the Supply Assurance as the projected wholesale supply for 2025 through 2045.

If the BDP is implemented as presented in SFPUC's "with BDP," the SFPUC will be able to meet the MPWD's projected water demands in normal years but would experience supply shortages in single dry years or multiple dry years. Such implementation of the BDP will require rationing in all single dry years and multiple dry years. Since the MPWD's water supply relies solely on the SFPUC RWS, impacts from the potential implementation of the BDP, as presented in SFPUC's "with BDP" scenario, will impact MPWD's service reliability. MPWD will be able to meet the projected water demands in normal years but would experience supply shortages in single dry years or multiple dry years.

MPWD is working with BAWSCA and its agencies to identify potential regional mitigation measures to improve reliability for regional and local water supplies and to meet its customers' water needs. If conditions for large drought cutbacks to BAWSCA wholesale agencies persist, such as those presented by SFPUC in "with BDP", until SFPUC provides additional alternate supplies, MPWD will need to implement extensive demand management practices to invoke strict restrictions on potable water use.

MPWD's WSCP implements actions for six shortage levels in the case of water shortage conditions from its sole supplier, the SFPUC. Each ascending shortage level corresponds to an additional 10 percent consumer remand reduction.

Conclusion

While the 2020 UWMP indicated water supply deficiencies during single and multiple dry years, the water conservation measures under the 2020 UWMP, along with City of San Carlos measures related to water conservation, would ensure adequate supply of water to serve the project and reasonably foreseeable future development. For example, San Carlos Municipal Code Section 18.18.080, Water Efficient Landscaping and Irrigation, requires landscaping to be designed and plantings selected so that water use is minimized. In addition, the project and future development would be constructed using the most recent California Green Buildings Code (Part 11, Title 24, known as “CalGreen”), which requires construction to incorporate water efficiency and conservation measures, such as the installation of low flow toilets and faucets. This impact would be less than significant.

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

Less Than Significant Impact. In addition to serving customers within San Carlos, the City conveys wastewater from four small neighboring county-operated sewer maintenance districts to the SVCW WWTP. The project Applicant has completed a project sanitary sewer capacity analysis as required by the City. The project would construct one tie-in location to an existing 27-inch sanitary sewer mainline in Industrial Road. The project sanitary sewer capacity analysis evaluated the potential effects of additional sanitary sewer flow the project would add to the existing sanitary sewer system and determined the existing sanitary sewer system in Industrial Road has sufficient capacity to support the additional flow from the proposed improvements (BKF 2021). The project would be required to complete any improvements/upgrades to the City’s sanitary sewer infrastructure needed to serve the project.

The SVCW WWTP has the capacity to treat 29 mgd and in 2020 received an average of approximately 12.62 mgd of flows per day from customers in the SVCW service area (MPWD 2020). Accordingly, the SVCW WWTP has adequate capacity to treat project-generated wastewater. This impact would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. (Responses d and e). The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The project would comply with all applicable Federal, State, and local management and reduction statutes and regulations related to solid waste. Potential impacts related to solid waste would be less than significant during project construction and operation, as discussed below.

Construction Waste

Solid waste generated by construction of the proposed project would largely consist of demolition waste and construction debris. In compliance with the California Green Building Standards Code (Part 11, Title 24, known as “CalGreen”), the project Applicant would be required to prepare a waste management plan for on-site sorting of construction debris and submit the plan to the City of San Carlos for approval. The City Municipal Code includes construction waste diversion and recycling requirements through Municipal Code Chapter 8.05, Recycling and Diversion of Construction and Demolition Debris. Chapter 8.05 requires covered projects generating waste comprised of mixed debris, including both structural debris (e.g.,

wood, metal, wallboard) and inert materials (dirt, asphalt, brick, and/or cinderblock), to divert at least 60 percent of all generated tonnage. Compliance with these regulations would prevent significant solid waste impacts during project construction.

Operational Waste

For the purposes of this analysis, the proposed project is estimated to generate similar levels of solid waste compared to existing conditions. The project can be expected to generate a maximum of approximately 218.17 tons of solid waste per year.⁸ Most of the solid waste generated in San Carlos is transported to the Ox Mountain Landfill near Half Moon Bay. The landfill, owned and operated by Browning Ferris Industries, is expected to reach capacity in 2034 (CalRecycle 2024a). In 2023, the landfill received 601,127 tons of solid waste, of which 38,900 tons were from San Carlos (CalRecycle 2024b, CalRecycle 2024c). The proposed project's solid waste generation would be a small percentage (approximately 0.04% based on historical values) of the total solid waste received at the landfill and is well within the capacity of the landfill.

The proposed project would include areas for storage of solid waste and recyclable materials for pick up by Recology, including an existing waste/recycle enclosure northwest of the Operations building and a new covered waste/recycle enclosure located at the northwest end of the new Logistics Warehouse & Shops building. The project has received a will serve letter from Recology, dated August 3, 2022, stating the project proposal is acceptable for service levels and locations(s) specific to the subject property. The proposed project would not impair the City of San Carlos' compliance with AB 341, SB 1018, or SB 1383. Compliance with these regulations would prevent significant solid waste impacts during project operation.

3.19.4 References

- BKF Engineers (BKF). 2021. 275 Industrial Road – PG&E San Carlos Service Center Sanitary Sewer Capacity Analysis. December 13, 2021.
- California Emissions Estimator Model (CalEEMod). 2024. User Guide for CalEEMod Version 2022.1, Appendix G: Default Data Tables. Accessed April 18, 2024, at <https://www.caleemod.com/user-guide>.
- CalRecycle. 2024a. SWIS Facility/Site Activity Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Accessed March 11, 2024, at <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/3223>.
- _____. 2024b. RDRS Report 3: Disposal Facility Summary of Total Tons for Disposal and Beneficial Reuse Material Streams. Accessed March 11, 2024, at <https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/DisposalFacilitiesAllLocationTons>.
- _____. 2024c. RDRS Report 2: Jurisdiction Disposal and Beneficial Reuse by Destination. Accessed March 11, 2024, at <https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial>.
- City of San Carlos. 2001. San Carlos Municipal Code Chapter 8.05: Recycling and Diversion of Construction and Demolition Debris.

⁸ The project's anticipated annual solid waste generation rate is derived from the California Emissions Estimator Model (CalEEMod) Solid Waste Disposal Rates by Analysis Level and Land Use Subtype for projects of the General Light Industry land use subtype, which has a tons per unit solid waste generation rate of 1.24 tons of waste generated per 1,000 square feet of building area.

- _____. 2011. San Carlos Municipal Code Chapter 18.18: Landscaping.
- _____. 2024a. San Carlos Sewer System General Information. Undated. Accessed March 20, 2024, at https://www.cityofsancarlos.org/city_hall/departments_and_divisions/public_works/view_documents.php#outer-73sub-78.
- _____. 2024b. City of San Carlos Citywide Storm Drain System Master Plan. April 2027. Accessed March 14, 2024, at https://www.cityofsancarlos.org/city_hall/departments_and_divisions/public_works/view_documents.php#outer-74.
- Mid-Peninsula Water District (MPWD). 2020. 2020 Urban Water Management Plan. Accessed August 8, 2023, at <https://www.midpeninsulawater.org/documents>.
- Recology. 2024. Enclosure and New Development Approval Form. Signed August 3, 2022.
- Silicon Valley Clean Water (SVCW). 2024. Capital Improvement Program 2024 Update FY23-24to FY33-34. Accessed March 6, 2024, at <https://svcw.org/what-we-do/capital-improvement-program/>.

3.20 WILDFIRE

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

3.20.1 Environmental Setting

The project site is located within the City of San Carlos on a flat parcel that is primarily paved. Surrounding parcels are also primarily developed except for landscape areas and a vegetated strip of land along Hwy 101 immediately north of the project site. According to 2020 mapping data from the California Department of Forestry and Fire Protection (CalFIRE), the project site is within a Local Responsible Area. The project site is not within a Fire Hazard Severity Zone (FHSZ) (i.e., a mapped area that designates zones – based on factors such as fuel, slope, and fire weather – with varying degrees of fire hazards) (CalFire, 2022).

3.20.2 Discussion

Would the project:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

No Impact (a-d). The project site is in an urban area on a flat developed parcel. The project site is not located within or near a state responsibility and not within or near a FHSZ and would not exacerbate wildfire hazard in the area. The project would not impair an emergency response or emergency evacuation plan. No impact would occur.

3.20.3 References

California Department of Forestry and Fire Protection (CalFire) 2022. Fire and Resource Assessment Program, California Fire Hazard Severity Zone Viewer. Available: <https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414>. Accessed July 2023.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.21.1 Discussion

- a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact with Mitigation Incorporated. The project site is in an urbanized, extensively developed area of San Carlos. PG&E has been operating the Service Center since the 1970's and the site is almost entirely paved except for landscaping trees within the site and channelized drainage ditches boarding the site on three sides. There are no sensitive natural communities, no areas of sensitive habitat, and no areas of critical habitat occurring at the project site. However, Mitigation Measure BIO-1 is recommended to protect nesting birds during construction. This measure would reduce impacts to birds protected under the Migratory Bird Treaty Act to less than significant.

There are no buildings currently listed or eligible for listing on the California Register of Historical Resources, no recorded archaeological sites, and no known paleontological resources located on the project site. However, Mitigation Measures CUL-1 Conduct Archaeological Sensitivity Training, CUL-2 Protection of Unknown Archaeological Resources, and CUL-3 Protection of Human Remains are recommended to prevent impacts to unknown archaeological and cultural resources during construction. With implementation of these measures potential impacts to archaeological resources would be less than significant.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact. The proposed project would modernize the existing San Carlos Service Center and would implement design features that would control potential environmental impacts, particularly to stormwater runoff quality and energy use. The project would not increase activities at the site, add new employees, or otherwise alter existing operations. The primary project impacts would occur during construction and Mitigation Measures BIO-1, CUL-1, CUL-2, and CUL-3 would reduce potential impacts from construction to less than significant. The project would not contribute to cumulatively considerable environmental impacts.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact. The proposed project would not have environmental effects which could cause substantial adverse effects on human beings. The project proposes to modernize the existing PG&E Service Center and would result in new buildings and site design that would implement design controls to reduce potential impacts to stormwater runoff, reduce energy use through electrification of buildings and installation of PV carports, and protect areas of the Service Center from flooding and potentially contaminating flood waters. The project would not increase vehicle traffic to the site, and it would not introduce new activities that would create new potential impacts on the environment. The proposed project’s environmental effects would be less than significant.

Chapter 4. List of Preparers

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