

PUBLIC REVIEW DRAFT

Prepared for:

City of San Carlos
600 Elm Street
San Carlos, CA 94070
Contact: Laura Richstone
Senior Planner



Initial Study/Mitigated Negative Declaration

930 Commercial Street Project

SCH No.: *Pending*

Prepared by:



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[OCTOBER 2025]

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1. Introduction and Purpose

1.1 Project Overview

The 930 Commercial Street Project (herein referenced as the “project” or “proposed project”) includes the demolition of two existing single-story industrial buildings and the construction of a new 48,370-square-foot commercial automobile and vehicle repair facility at 930 and 940 Commercial Street in the City of San Carlos (City).

1.2 Statutory Authority Requirements

In accordance with the California Environmental Quality Act of 1970, as amended (California Public Resources Code, Section 21000-21177) and pursuant to the State CEQA Guidelines (Title 14, California Code of Regulations [CCR], Chapter 3, Section 15063), the City, acting in the capacity of the Lead Agency, is required to undertake the preparation of an Initial Study (IS) to determine if the project would have significant environmental impacts. The environmental document is intended as informational, undertaken to provide an environmental basis for subsequent discretionary actions on the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and other discretionary approval would be required.

This environmental document and supporting analysis will be subject to a 30-day public review period. During this review, public comments on the document should be addressed to the City. Following the review of any comments received pertaining to the CEQA review, the City will consider these comments as part of the project’s environmental review and determination. The comments will be included in the IS document for consideration by the City of San Carlos’ Planning Commission and City Council.

1.3 Purpose of the Initial Study

The purpose of the IS is to: (1) identify environmental impacts; (2) provide the Lead Agency with information to use as the basis for deciding whether to prepare an Environmental Impact Report (EIR), Mitigated Negative Declaration (MND) or Negative Declaration (ND); (3) enable a Lead Agency or Applicant to modify a project, mitigating potential adverse impacts before an EIR is prepared; (4) facilitate an environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the finding in an MND or ND that a project would not have a significant environmental effect; (6) eliminate needless EIRs; (7) determine whether a previously prepared EIR could be used for a project; and (8) assist in the preparation of an EIR, if required, by focusing the EIR on the effects determined to be significant, identifying the effects determined not to be significant, and explaining the reasons for determining that potentially significant effects would not be significant.

Section 15063 of the State CEQA Guidelines identifies specific disclosure requirements for inclusion in an IS. Pursuant to those requirements, an IS must include the following: (1) a description of the project, including the location of the project; (2) an identification of the environmental setting; (3) an identification of environmental effects by use of a checklist; (4) a discussion of ways to mitigate significant effects identified, if any; (5) an examination of a project’s compatibility with existing zoning, plans, and other applicable land use controls; and (6) the name of the person or persons who prepared or participated in the preparation of the IS.

1.4 California Environmental Quality Act

In accordance with CEQA and the State CEQA Guidelines, this IS has been prepared for the proposed project and its associated discretionary approvals. The IS indicates that the potentially significant impacts of the project can be reduced to less than significant levels with implementation of mitigation measures, and therefore, the project requires preparation of an Initial Study/Mitigated Negative Declaration (IS/MND).

The IS/MND serves as the environmental document that presents the analysis of project impacts on each of the environmental topic areas in the CEQA Environmental Checklist provided in Section 3.0. This document will serve to inform City decision makers, representatives of affected trustee and responsible agencies, and other interested parties of the potential environmental effects that may occur with approval and implementation of the proposed project.

1.5 California Environmental Quality Act Review and Comment

This IS/MND has been submitted to potentially affected agencies and individuals. Notices of the availability of the IS/MND for review and comment, as well as the environmental documentation, are available on the City of San Carlos' website (https://www.cityofsancarlos.org/business_detail_T10_R407.php) for review.

A 30-day public review period has been established for the IS/MND in accordance with Section 15073 of the State CEQA Guidelines. During review of the IS/MND, affected public agencies and interested parties should focus on the document's adequacy in identifying and analyzing the potential environmental impacts and the ways in which the potentially significant effects of the project can be avoided or mitigated. Comments on the IS/MND and the analysis contained herein must be received by **5:00 p.m. on November 21, 2025**, and should be addressed to:

City of San Carlos
Laura Richstone, Senior Planner
600 Elm Street
San Carlos, CA 94070
Lrichstone@cityofsancarlos.org
(650) 802-4174

Following receipt and evaluation of comments from agencies, organizations, and/or individuals, the City will determine whether any substantial new environmental issues have been raised. If so, further documentation – such as an EIR or an expanded IS/MND – may be required. If not, the project and the environmental documentation are tentatively scheduled to be submitted to the San Carlos Planning Commission and City Council for consideration.

1.6 Organization of the Initial Study

The IS/MND is organized into four (4) sections, as described below:

- **Section 1.0: Introduction and Purpose.** This section provides an introduction, project summary, and overview of the conclusions in the IS/MND.
- **Section 2.0: Project Description.** This section provides a brief description of the project location, relevant background information, and a description of the existing conditions of the project site and vicinity. This section provides a description of the proposed project and the necessary discretionary approvals.
- **Section 3.0: Initial Study Checklist.** This section includes the complete Environmental Checklist Form from the State CEQA Guidelines, which provides an overview of the potential impacts that may or may not result from project implementation. The Environmental Checklist Form also includes “mandatory findings of

significance”, as required by CEQA. The analysis concludes the significance of impacts and standard conditions, regulatory requirements, and mitigation measures to reduce potentially significant impacts.

- **Section 4.0: List of Preparers.** This section identifies key staff involved in the preparation of the IS/MND.

2. Project Description

2.1 Project Location

The City of San Carlos (City) is located in the northeastern portion of San Mateo County, within the San Francisco Peninsula. The City is bordered by the Belmont to the north, the San Francisco Bay to the east, Redwood City to the south, and open space and Interstate 280 (I-280) to the west; refer to Exhibit 1, Regional Vicinity.

The proposed 930 Commercial Street Project (herein referenced as the “project” or “proposed project”) is located on an approximately 73,524 square-foot (1.69 acres) site at 930 and 940 Commercial Street (Assessor’s Parcel Number [APN]: 046-161-030); refer to Exhibit 2, Site Vicinity. Regional access to the project site is provided via the Bayshore Freeway (Highway 101) and El Camino Real (I-82). Local access to the site is provided via Commercial Street.

2.2 Environmental Setting

The project site is currently occupied by two (2) single-story industrial buildings, two (2) asphalt parking lots, and ornamental landscaping; refer to Exhibit 3, Existing Conditions. The existing structures include one (1) concrete building approximately 19 feet tall and 19,068 square feet in size, and one (1) metal building approximately 20 feet tall and 14,639 square feet in size. The existing northern and southern parking lots include a combined total of approximately seventy-eight (78) surface parking spaces. Two (2) concrete driveways located at the eastern boundary of the site provide site access along Commercial Street. Ornamental landscaping is located along the Commercial Street frontage and sporadically within the parking lots. The site is currently fenced with a 6-foot-tall chain link fence along the northern and western site boundaries. A fence, including a sliding gate, bisects the northern parking lot. Wood slats are also located on the fencing along the western boundary, a portion of the northern boundary, and the sliding gate. On-site topography is relatively flat.

2.2.1 General Plan Land Use Designation and Zoning

According to the San Carlos General Plan (General Plan) Figure 3-3, Major Developed Areas in San Carlos, the project site is located within the East Side Innovation District Vision Plan (Vision Plan) area. The Vision Plan area consists of 150 acres of commercially zoned areas and is generally bounded by Highway 101 to the east, Brittan Avenue to the south, Old Country Road to the west, and Holly Street to the north. Approximately 1.7 million square feet of net new development has been proposed (i.e., under review, approved, or constructed) throughout the Vision Plan area.

According to the City of San Carlos General Plan Map, the project site is designated as Planned Industrial, which is intended to accommodate research and development, biotech, light industrial, flex warehousing, and related uses. According to the City of San Carlos Interactive Zoning Map, the site is zoned as Heavy Industrial (IH), which is intended to accommodate a broad range of industrial uses, including industrial buildings and complexes, flex space, warehouses, manufacturing and assembly, and other uses that require large, warehouse-style buildings with flexible floor plans as well as small-scale retail and ancillary office uses.¹ A full list of permitted uses can be found in San Carlos Municipal Code (Municipal Code) Section 18.07.020, Land use regulations.

¹ City of San Carlos, Interactive Zoning Map, <https://mydashgis.com/SanCarlosZoning/map>, accessed September 18, 2025.



Source: Google Earth Pro, October 2025



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930 COMMERCIAL STREET PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Regional Vicinity

Exhibit 1



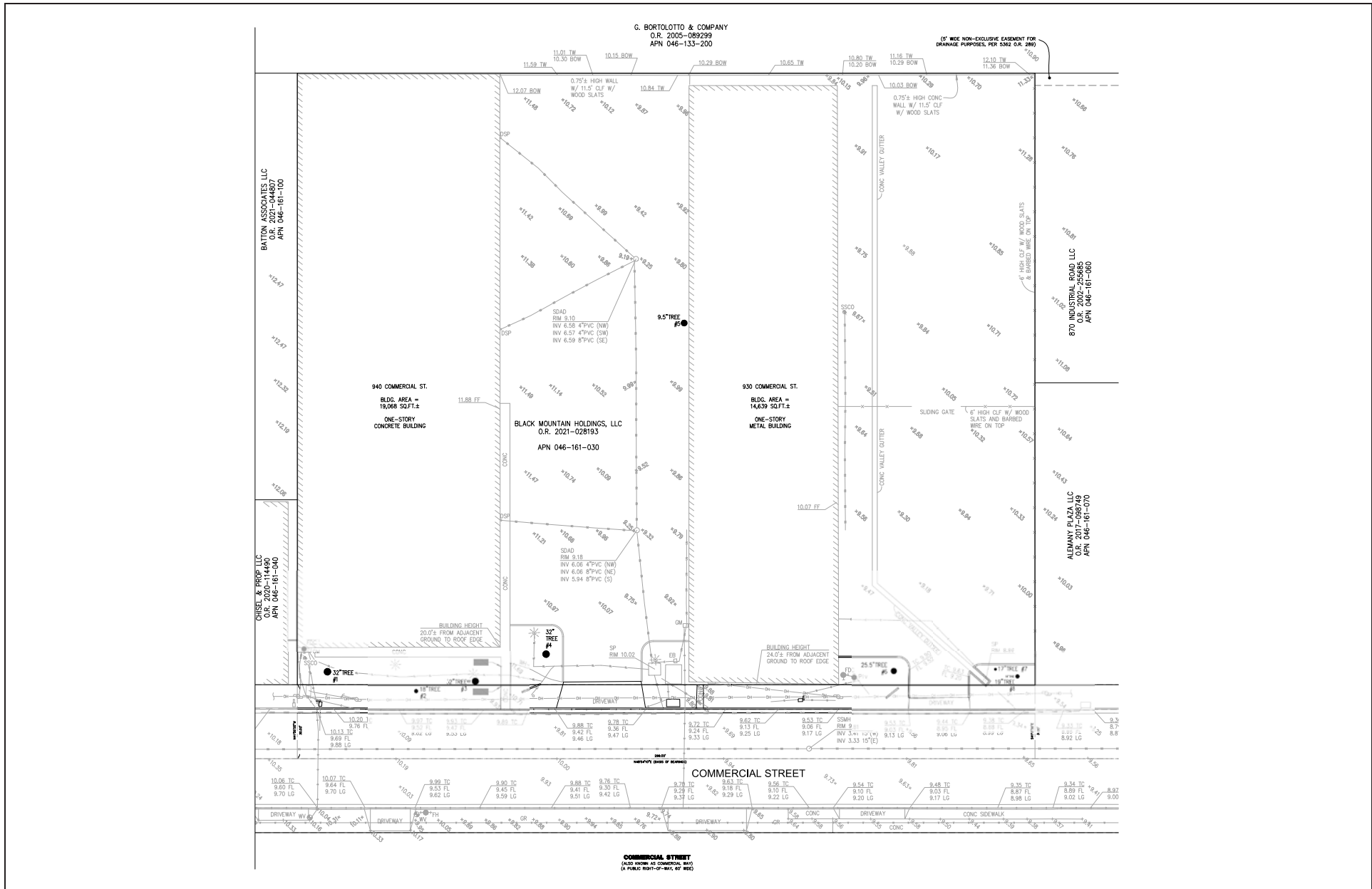
PROJECT SITE

OFF-SITE
IMPROVEMENT AREAS

Source: Google Earth Pro, October 2025



 NOT TO SCALE
10/2025



Source: Perkins&Will, October 2025



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930 COMMERCIAL STREET PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION **Existing Conditions**

2.3 Project Characteristics

The proposed project includes the removal of the two (2) existing single-story industrial buildings and asphalt parking lots, in order to construct a new one-story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements; refer to Exhibit 4, Conceptual Site Plan. The facility would be designed to service and maintain a fleet of corporate gasoline-powered, light-duty vehicles, featuring a variety of amenities and spaces geared towards the industrial use; refer to Exhibit 5, Floor Plan – Ground Floor, through Exhibit 7, Floor Plan – Roof. The ground floor of the facility (43,604 square feet) would include thirty (30) car storage spaces, three (3) flat stalls, four (4) lift bays, two (2) wash bays, a detail bay, a smog bay, mechanic bay, alignment bay, workshop, open work space, tire changing area, oil storage, building storage, temporary storage, open tool storage, office room, fabrication room, main electrical room, plumbing room, break room, vehicle history room, IT/minimum point of entry (MPOE) room, laundry/janitorial room, equipment room, parts wash and media blasting room, trash room, technical library room, reverse osmosis room, fuel shed, unisex restrooms, foyer, fire extinguisher cabinets, and fire hose cabinets. The mezzanine floor of the facility (4,766 square feet) would include mezzanine space, guard railing, and a roof access hatch. The roof of the facility would include rooftop equipment, photovoltaic panels, smoke and heat vents, and a roof access hatch. Ancillary facilities, including internal stairs and a custom-sized material lift, are also proposed.

2.3.1 Operations

Hours of operation would be Monday through Friday, from 9:00 a.m. to 6:00 p.m. The facility would be closed on Saturdays and Sundays, with the exception of vehicle deliveries. The proposed facility would employ approximately eight (8) employees, with a maximum of four part-time mechanics on-site at any one time. The facility would have up to five (5) vehicle deliveries (up to one [1] vehicle per single-unit-30 [30] box truck) during non-operation hours on a quarterly basis (3 months).

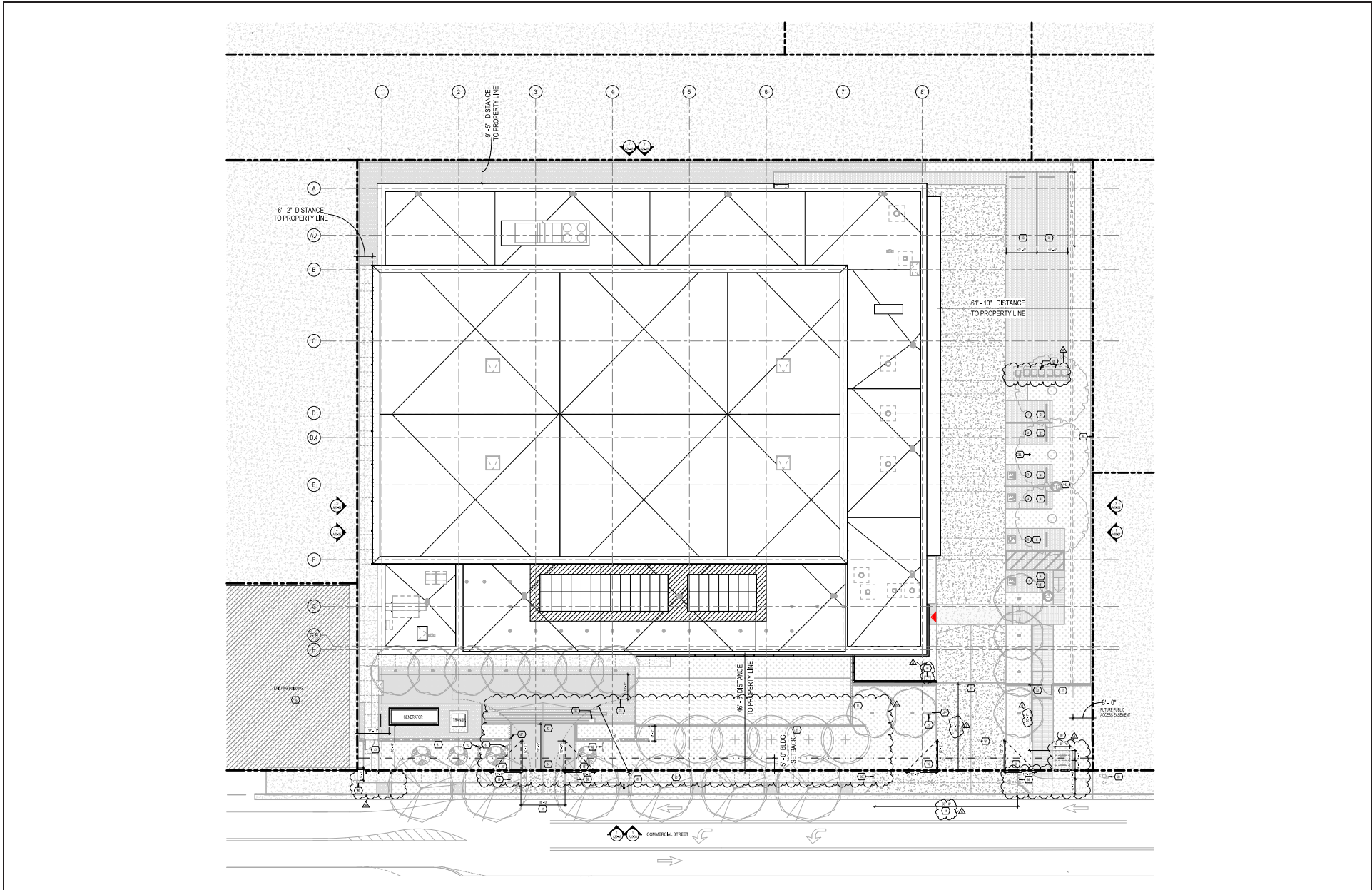
2.3.2 Architectural Design and Character

The proposed facility would have a maximum height of 42 feet, measured to the top of the mezzanine, and is best categorized as a contemporary architectural style. The exterior design employs a combination of white, light gray, and dark gray tones and features wide, durable, flat vertical metal panels with projected fins. Glazed, storefront-style windows with metal framing further enhance the structure's modern design; refer to Exhibit 8, Building Elevations – North and South, and Exhibit 9, Building Elevations – East and West.

An 8-foot-tall decorative metal fence would surround the project site boundaries. Cantilevered metal vehicular gates and metal pedestrian gates would be located along the eastern portion of the site. An emergency generator and transformer would be located in the southeastern corner of the site. The metal fence, vehicular gates, and pedestrian gates would feature a combination of stucco and metal finish, which would be designed to screen the generator and transformer from views along Commercial Street and complement the proposed facility's contemporary architectural style.

2.3.3 Site Access and Parking

Project ingress and egress would occur via two new driveways, located along Commercial Street. The northern-most driveway would serve as the main driveway and provide primary site access for staff, visitors, and deliveries. The southern-most driveway would serve as a secondary driveway and provide restricted access for Pacific Gas and Electric (PG&E) and generator maintenance personnel only. This driveway would not provide access to the larger site. Specifically, only the northern-most driveway would provide access to the proposed parking lot, loading zone (two [2] loading spaces), and vehicle bays, and the southern-most driveway would provide access to the proposed service yard.



Source: Perkins&Will, October 2025

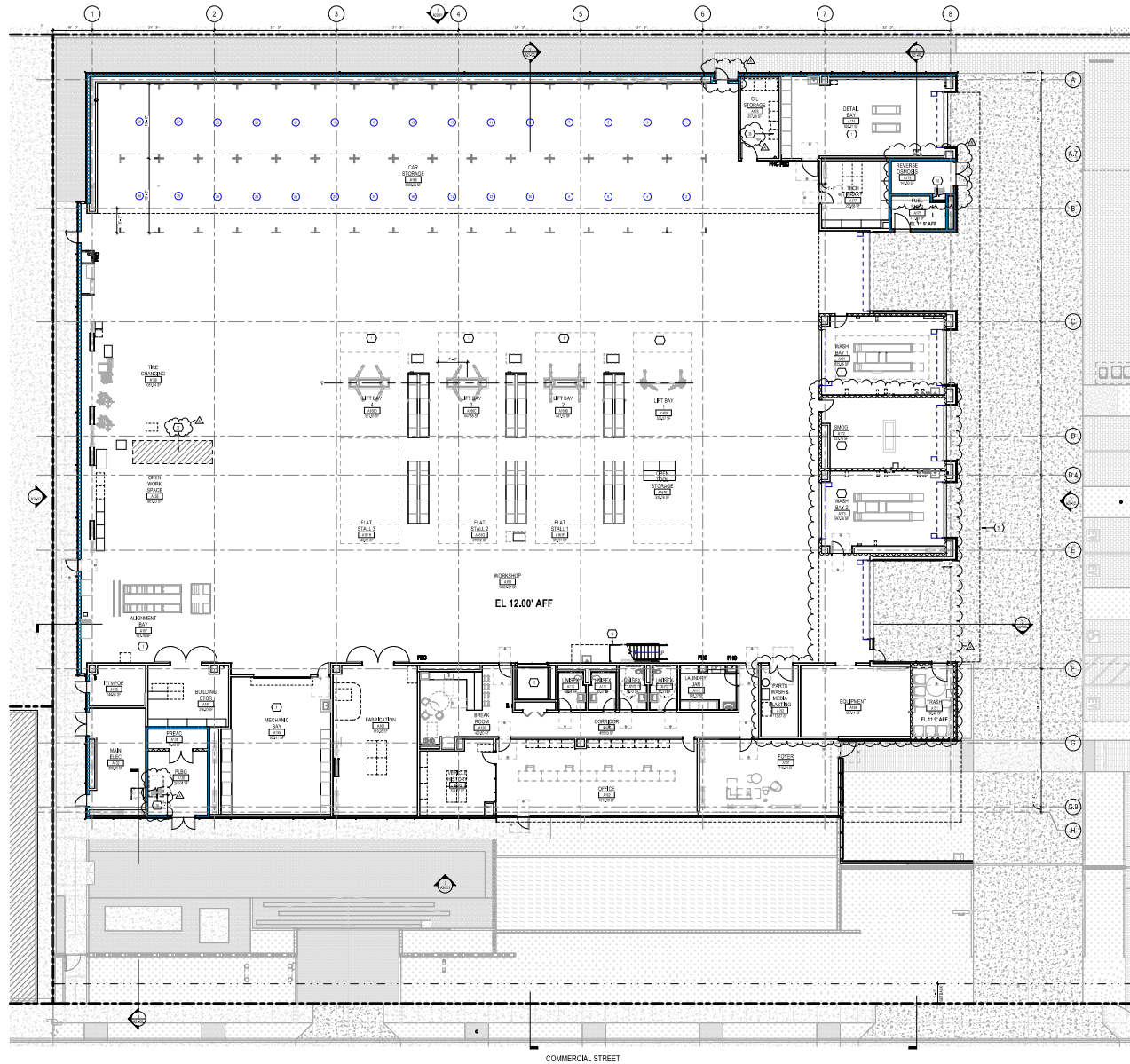


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Conceptual Site Plan



Source: Perkins&Will, October 2025

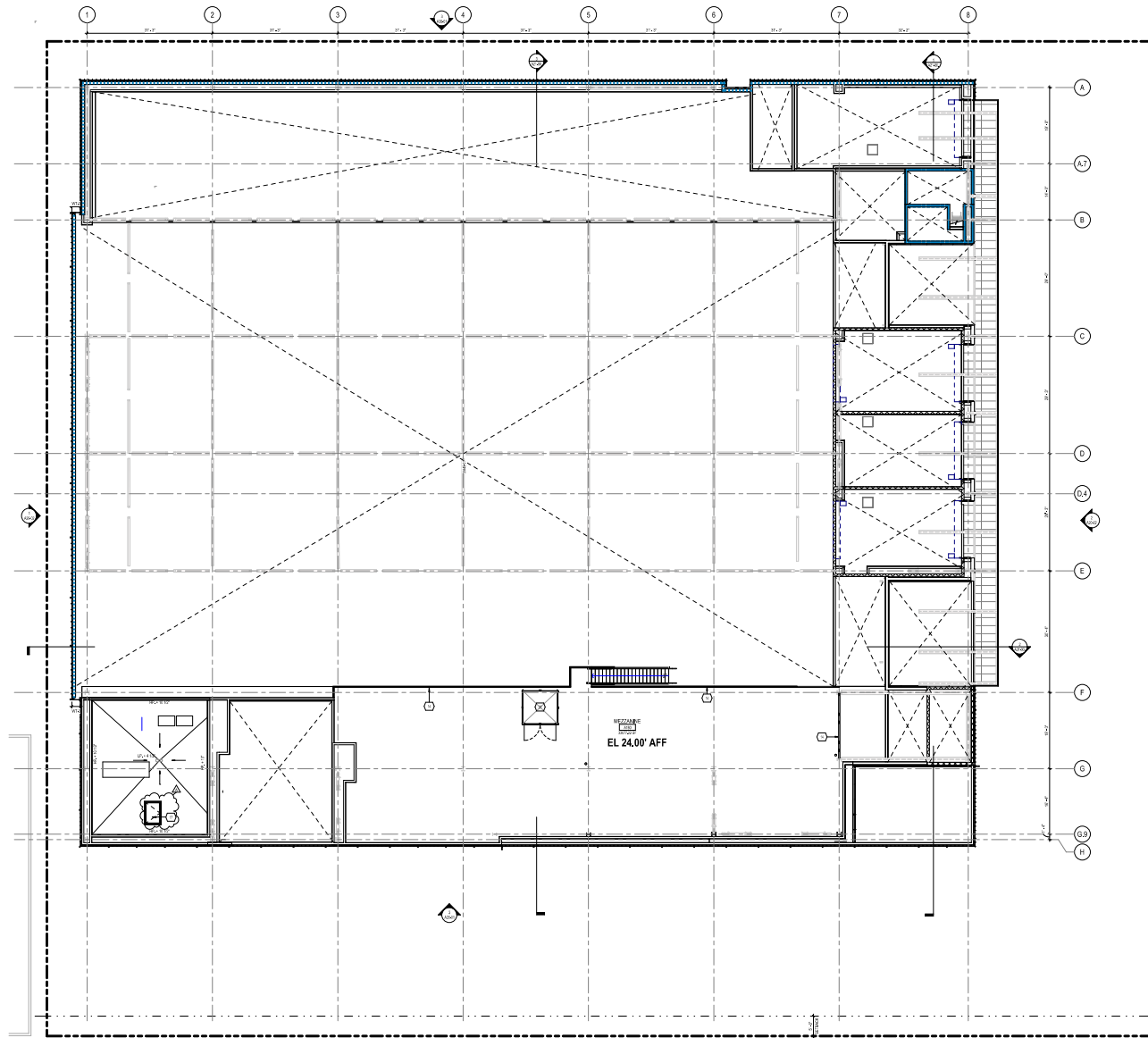


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INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Floor Plan – Ground Floor

Exhibit 5



Source: Perkins&Will, October 2025

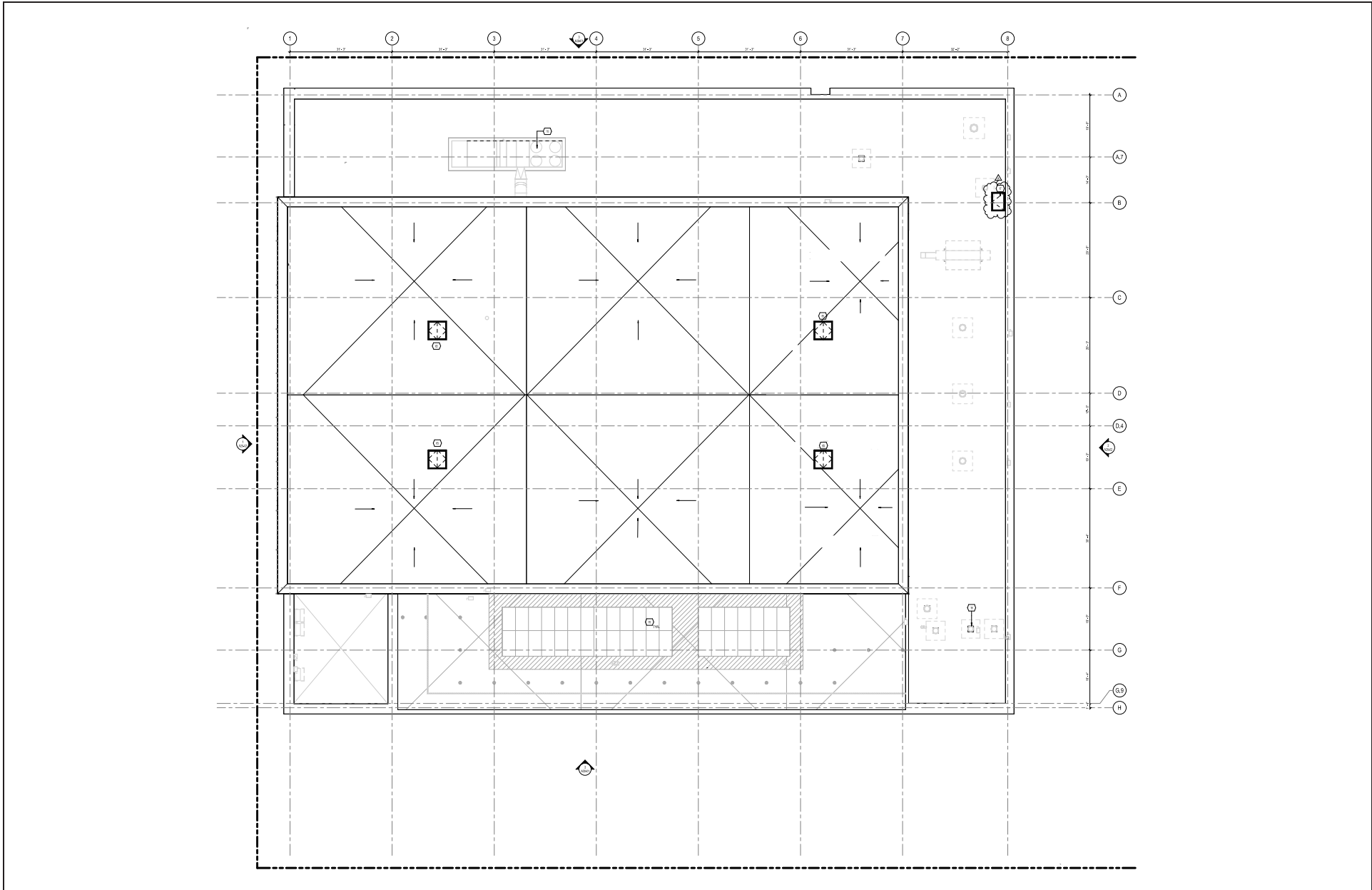


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930 COMMERCIAL STREET PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
Floor Plan – Mezzanine Floor

Exhibit 6



Source: Perkins&Will, October 2025

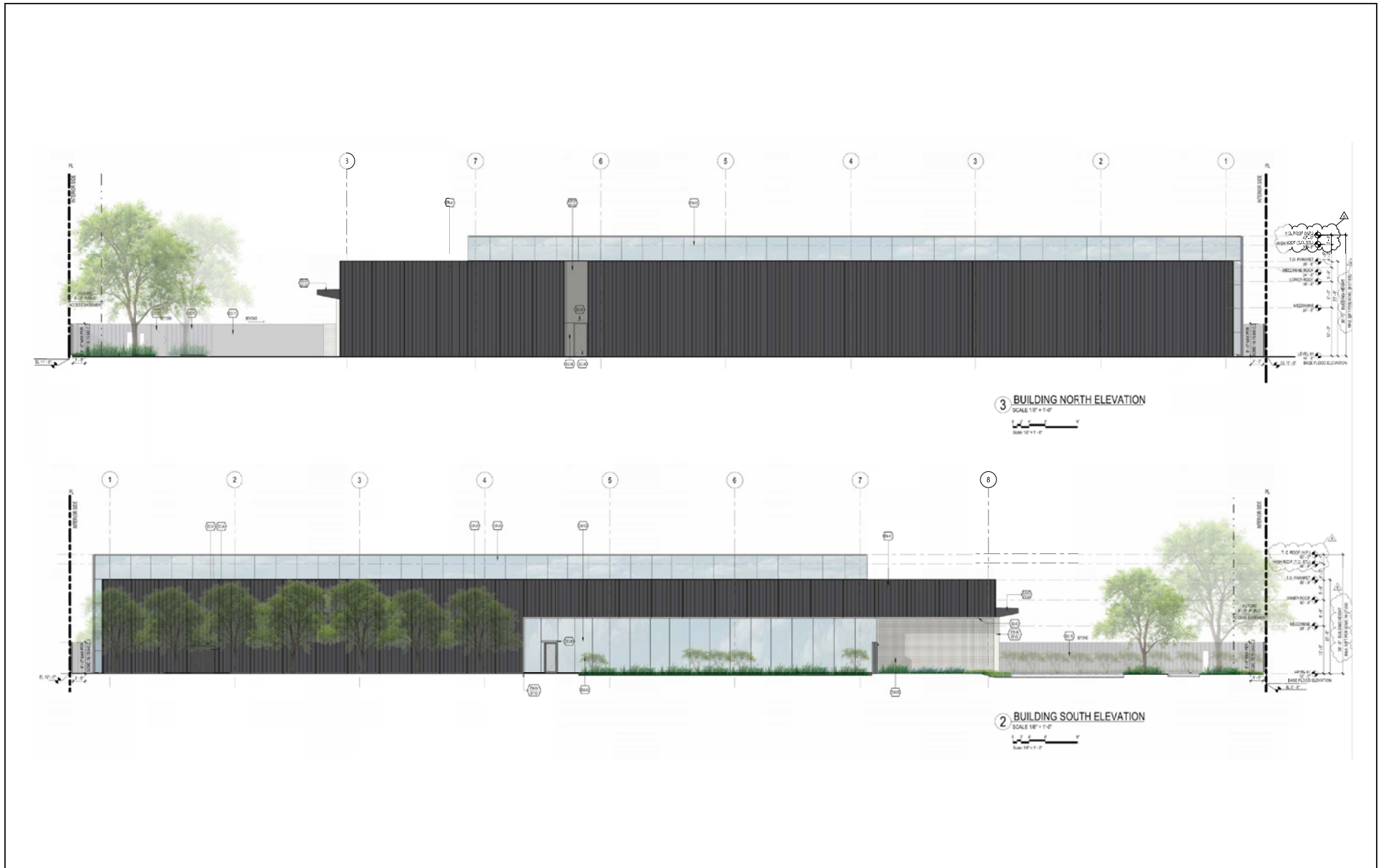


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INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Floor Plan – Roof



Source: Perkins&Will, October 2025

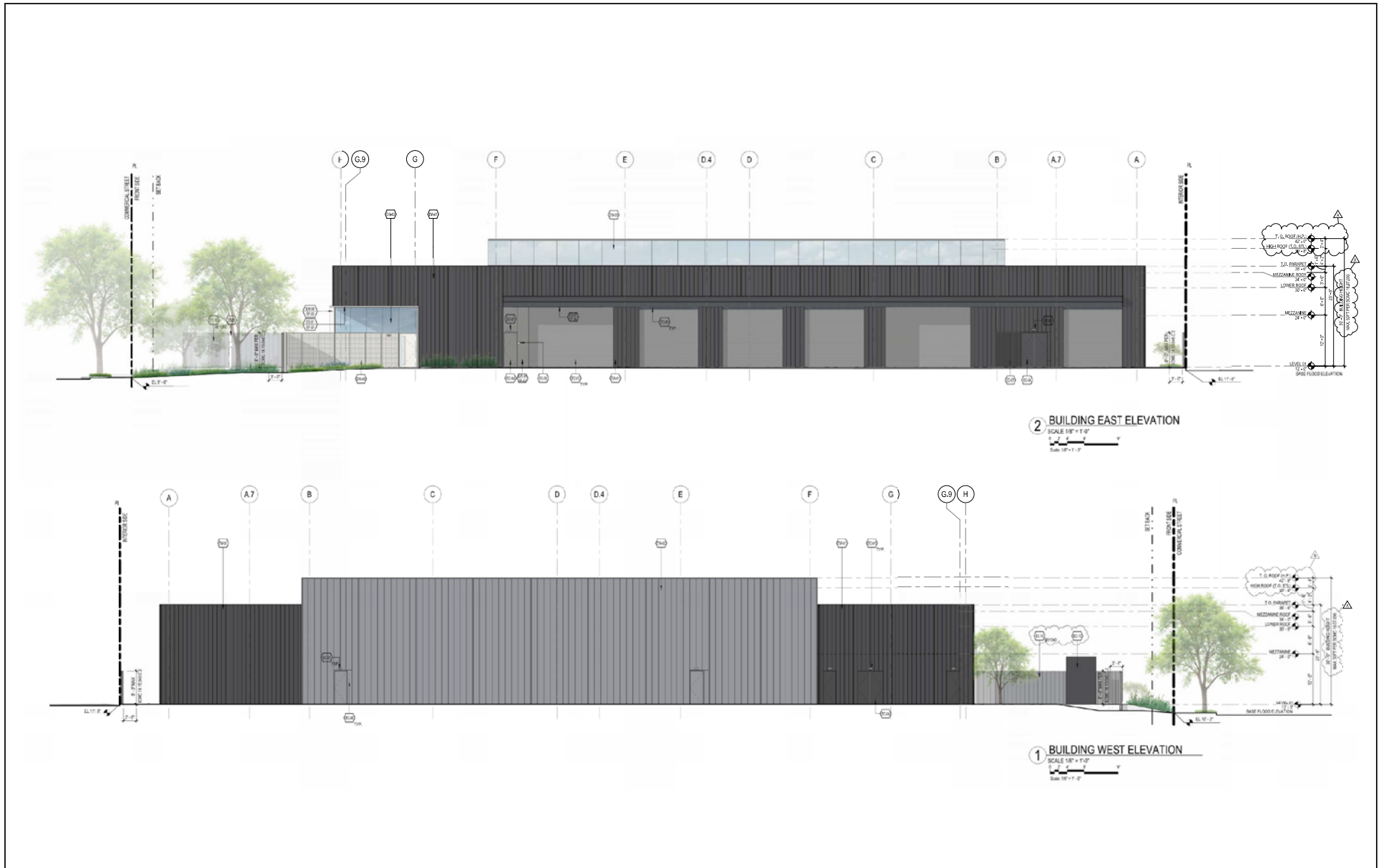


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930 COMMERCIAL STREET PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION Building Elevations – North and South

Exhibit 8



Source: Perkins&Will, October 2025



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930 COMMERCIAL STREET PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION **Building Elevations – East and West**

Exhibit 9

Because the project site is located within one-half mile of the Caltrain San Carlos Station, pursuant to California Government Code Section 65863.2 (Assembly Bill 2097 [2022]), the project is exempt from the City of San Carlos minimum parking requirements (pursuant to Municipal Code Section 18.20.040, Required parking spaces).²

Nonetheless, the project would provide a total of six (6) parking spaces, consisting of two (2) standard spaces, two (2) electric vehicle (EV) spaces, one (1) Americans with Disabilities Act (ADA) EV space, and one (1) ADA van space. On-site parking would be located along the eastern boundary of the project site and would be accessed via the northernmost driveway located in the northeastern corner of the site. Four (4) short-term bicycle parking spaces would be provided near the northeastern corner of the site.

Primary pedestrian access to the facility's main entrance, located in the northeastern corner of the site, would be provided via the proposed sidewalk, connecting to the proposed parking lot. Secondary pedestrian access would be provided via a second entrance along the property's southwestern corner. It should be noted that a proposed 8-foot-wide public access easement along the northern site boundary would be dedicated for future use as an 8-foot-wide pedestrian pathway. The proposed sidewalk would connect to a future public pedestrian pathway, which is planned to become a segment of the Discovery Path, envisioned in the City's Vision Plan. This future pathway would ultimately connect to the existing pedestrian network, including pedestrian facilities along Industrial Road and to the proposed Commercial Street pedestrian facilities associated with the approved Alexandria Center for Life Science Project (State Clearinghouse Number 2021060668), anticipated as part of the Vision Plan.

2.3.4 Landscaping and Open Space

On-site landscaping would involve the removal of seven (7) existing trees. Ornamental landscaping would be planted throughout the project site, particularly on the ground level along the northern and eastern site boundaries; refer to Exhibit 10, Conceptual Landscape Plan. Planting materials would feature drought-tolerant plants, including a mix of trees, shrubs, and groundcover, some of which would be contained in bioretention planters. On-site tree varieties would include 36-inch box species (strawberry tree multi-trunk, swan hill fruitless olive, and fem pine) and 24-inch box species (Dr. Hurd common manzanita). Shrub varieties would include Howard McMinn manzanita, California coffeeberry, and white sage. Groundcover and perennial landscaping may include giant hummingbird's mint, purple giant hyssop, blonde ambition blue grama, Karl Foerster feather reed grass, California gray rush, mat rush, deer grass, trailing myoporum, and Margarita BOP penstemon. In total, twenty-six (26) new trees would be planted on-site, and approximately 11,775 square feet of the project site would be landscaped.

Off-site landscape improvements would involve the removal of one (1) existing street tree along Commercial Street and ornamental landscaping would be planted along the eastern boundary of the site. Planting materials would feature drought-tolerant plants, including a mix of trees and groundcover, consisting of silver linden (24-inch box species) and deer grass, respectively. In total, six (6) new street trees would be planted along Commercial Street right-of-way, and approximately 725 square feet of off-site areas would be landscaped.

2.3.5 Lighting and Signage

A combination of building-mounted, pole-mounted, bollard-mounted, and pathway lighting is proposed on-site, including nighttime parking lot, vehicle access, security, and landscaping lighting. All light fixtures would be required to comply with the City's lighting standards identified in Municipal Code Sections 18.15.070, Lighting and illumination, 18.29.050, Scope of design review, and 18.29.060, Design review criteria, which are intended to preserve the City's nighttime character and reduce the potential for excessive glare or light trespass.³

² Metropolitan Transportation Commission, Transit Stops – Major (2021), <https://opendata.mtc.ca.gov/datasets/transit-stops-major-2021/explore?location=37.506003%2C-122.254580%2C16.54>, accessed October 18, 2025.

³ City of San Carlos, San Carlos Municipal Code, current through Ordinance 1625, passed August 25, 2025, <https://www.codepublishing.com/CA/SanCarlos/>, accessed October 18, 2025.



The project frontage along Commercial Street would include building signage (with an intercom and Knox box) along the main driveway to the proposed surface parking lot. All signs would be required to comply with the City's sign regulations, as identified in Municipal Code Chapter 18.22, Signs, which are intended to govern the number, size, type, location, and physical aspects of proposed signage.

2.3.6 Utilities and Services

The utilities and services described below would serve the project site.

Water and Sanitary Sewer

Water services would be provided by the California Water Service (Cal Water). The City provides wastewater collection services, and wastewater flows to a pump station operated by Silicon Valley Clean Water (SVCW), which is then pumped to the SVCW Treatment Plant in Redwood Shores of Redwood City. The project proposes to include a storm drain inlet at the northwestern corner of the site and new inlets along the southern and eastern boundaries of the site. Storm drain manholes are proposed on the southern and eastern boundaries of the site. Two (2) new fire hydrants are also proposed: one (1) along Commercial Street right-of-way, and one (1) within the surface parking lot.

Storm Drainage

Stormwater is managed by the City under the San Mateo County Water Pollution Prevention Program. As part of the proposed project, drainage originating from the site would be contained on-site via the proposed bioretention planters.

Solid Waste

The City contracts with Recology for its refuse and recycling. Solid waste is hauled to the Shoreway Material Recovery Facility within the City.

Electricity and Natural Gas

PG&E would provide electricity services to the site. It should be noted that the proposed project would not utilize natural gas.

2.4 Project Construction and Phasing

Project construction would occur in a single phase over a duration of approximately 19 months. Construction activities are anticipated to commence in 2026, with the anticipated year of operation being 2028. The proposed project would export 300 cubic yards of soil and import 2,000 cubic yards of soil for a net import of 1,700 cubic yards of soil.

2.5 Project Permits and Approvals

The City of San Carlos is the Lead Agency for the project and has discretionary and ministerial authority over the project proposal, which includes the following:

- Adoption of the IS/MND for CEQA purposes;
- Protected Tree Removal Permit; and
- Design Review Permit.

3. Initial Study Checklist

Project title:

930 Commercial Street Project

Lead agency name and address:

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

Contact person and phone number:

City of San Carlos
Laura Richstone, Senior Planner
600 Elm Street
San Carlos, CA 94070
Lrichstone@cityofsancarlos.org
(650) 802-4174

Project location:

The proposed 930 Commercial Street Project is located on an approximately 73,524 square-foot (1.69 acres) site at 930 and 940 Commercial Street (Assessor's Parcel Number [APN]: 046-161-030).

Project sponsor's name and address:

930 Commercial Street LLC
405 El Camino Real, Suite 109
Menlo Park, CA 94025

General plan designation:

According to the City of San Carlos General Plan Map, the project site is designated as Planned Industrial.

Zoning:

According to the City of San Carlos Interactive Zoning Map, the project site is zoned as Heavy Industrial.

Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):

The proposed project includes the removal of the two (2) existing single-story industrial buildings and asphalt parking lots, in order to construct a new one-story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements. The facility would be designed to service and maintain a fleet of corporate gasoline-powered, light-duty vehicles, featuring a variety of amenities and spaces geared towards the industrial use. The ground floor of the facility (43,604 square feet) would include thirty (30) car storage spaces, three (3) flat stalls, four (4) lift bays, two (2) wash bays, a detail bay, a smog bay, mechanic bay, alignment bay, workshop, open work space, tire changing area, oil storage, building storage, temporary storage, open tool storage, office room, fabrication room, main electrical room, plumbing room, break room, vehicle history room, IT/minimum point of entry (MPOE) room, laundry/janitorial room, equipment room, parts wash and media blasting room, trash room, technical library room, reverse osmosis room, fuel shed, unisex restrooms, foyer, fire extinguisher cabinets, and fire hose cabinets. The mezzanine floor of the facility (4,766 square feet) would include mezzanine space, guard railing, and a roof access hatch.

The roof of the facility would include rooftop equipment, photovoltaic panels, smoke and heat vents, and a roof access hatch. Ancillary facilities, including internal stairs and a custom-sized material lift, are also proposed.

Surrounding land uses and setting: Briefly describe the project's surroundings:

The project site is generally surrounded by commercial and industrial land uses.

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Refer to Section 2.5, Project Permits and Approvals.

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.?

Refer to Section 3.18, Tribal Cultural Resources.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology and Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology and Water Quality | ☐ Land Use and Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population and Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities and Service Systems | ☐ Wildfire | ☐ 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 the mitigation measures described herein have been added to the project or 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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to aesthetics include:

- California State Scenic Highway Program
- San Carlos 2030 General Plan (General Plan)
- San Carlos Municipal Code (Municipal Code)

Environmental Setting

Scenic Resources and Scenic Vistas

For purposes of determining significance under CEQA, scenic resources are the visible natural and cultural features of the landscape that contribute to the public's enjoyment of the environment. A scenic vista is defined as a public viewpoint that provides expansive views of a landscape highly valued for its aesthetics, cultural, or natural qualities, for the benefit of the public. Public views are those that are experienced from a publicly accessible vantage point, such as a public roadway, public park, or a public trail. Scenic vistas can be officially designated by public agencies or informally recognized through local planning documents or community use.

According to the General Plan EIR, the City of San Carlos (City) does not contain any formally recognized scenic vistas; however, residents enjoy and highly value views of San Francisco Bay in the eastern portion of the City and the Santa Cruz Mountains in the western portion of the City. The San Francisco Bay is located approximately 0.39 miles to the northeast of the project site. The Santa Cruz Mountains are located approximately 4.14 miles to the southwest of the project site.

Scenic Highways

The California Department of Transportation (Caltrans) manages the California State Scenic Highway Program, which designates State scenic highways. State scenic highways are designated segments within the California State Scenic Highway Program that have been recognized for their scenic beauty and natural features. A scenic highway becomes officially designated when the local governing body applies and is approved by Caltrans for scenic highway designation and adopts a Corridor Protection Program that preserves the scenic quality of the land that is visible from the highway right-of-way.

According to the General Plan EIR, and the Caltrans State Scenic Highway System Map, there are no Officially Designated or Eligible State Scenic Highways in the City.⁴ The nearest Officially Designated State Scenic Highway is a segment of the Junipero Serra Freeway (Interstate 280 [I-280]), located approximately 2.82 miles to the southwest of the project site and outside the City's boundaries.

According to the General Plan, several County of San Mateo (County) Scenic Highways and City of San Carlos Scenic Roads are located within the City or adjacent to the City's jurisdictional boundaries. Specifically, County Scenic Highways include Edgewood Road and Canada Road and City of San Carlos Scenic Roads include Alameda de las Pulgas, San Carlos Avenue, Brittan Avenue, Club Drive, Crestview Drive, El Camino Real, and Holly Street. The nearest County Scenic Highway is a segment of Edgewood Road, located approximately 2.66 miles to the southwest of the project site. The nearest City of San Carlos Scenic Road is a segment of Brittan Avenue, located approximately 0.27 miles to the southeast of the project site.

General Plan Land Use Designation and Zoning

According to the City of San Carlos General Plan Map, the project site is designated as Planned Industrial, which is intended to accommodate research and development, biotech, light industrial, flex warehousing, and related uses. According to the City of San Carlos Interactive Zoning Map, the site is zoned as Heavy Industrial (IH), which is intended to accommodate a broad range of industrial uses, including industrial buildings and complexes, flex space, warehouses, manufacturing and assembly, and other uses that require large, warehouse-style buildings with flexible floor plans. Small-scale retail and ancillary office uses are also permitted.

The project site is also located within the East Side Innovation District Vision Plan (Vision Plan) area. The Vision Plan area consists of 150 acres of commercially zoned areas and is generally bounded by Highway 101 to the east, Brittan Avenue to the south, Old Country Road to the west, and Holly Street to the north. Approximately 1.7 million square feet of net new development has been proposed (i.e., under review, approved, or constructed) throughout the Vision Plan area.

Light and Glare

A potentially significant impact could occur if a new source of substantial light or glare is introduced that adversely affects daytime or nighttime views. Light impacts are generally associated with artificial illumination during evening and nighttime hours. Glare, by contrast, is often a daytime issue, resulting from sunlight or artificial light reflecting off polished surfaces such as window glass or reflective cladding. Such glare can interfere with the safe operation of vehicles on adjacent roadways. In urban settings, daytime glare is commonly linked to mid- and high-rise buildings with façades dominated by reflective glass or mirror-like materials. Nighttime glare typically arises from bright point-source lighting that contrasts sharply with existing low ambient light conditions.

The project site is located in a well-lit urbanized area of the City where moderate levels of ambient nighttime lighting currently exist, including street lighting, vehicular headlights along Commercial Street, architectural and security

⁴ California Department of Transportation. California State Scenic Highway System Map.

<https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed October 7, 2025.

lighting, and indoor building illumination. Due to the architectural design and building material of the existing one-story industrial buildings (i.e., the buildings do not consist of highly polished surfaces or emit bright point-source lighting), glare is not a prominent occurrence on-site.

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

No Impact: The project site is in a highly urbanized area of San Carlos and is surrounded by industrial and commercial uses. According to the General Plan EIR, the City does not have any formally recognized scenic vistas; however, residents enjoy and highly value views of San Francisco Bay in the eastern portion of the City and the Santa Cruz Mountains in the western portion of the City. Additionally, the General Plan classifies County Scenic Highways and City of San Carlos Scenic Roads as resources with significant scenic value.

The San Francisco Bay is located approximately 0.39 miles to the northeast of the project site. The Santa Cruz Mountains are located approximately 4.14 miles to the southwest of the project site. The nearest County Scenic Highway is a segment of Edgewood Road, located approximately 2.66 miles to the southwest of the project site. The nearest City of San Carlos Scenic Road is a segment of Brittan Avenue, located approximately 0.27 miles to the southeast of the project site. Views of the project site are not readily afforded from the San Francisco Bay, Santa Cruz Mountains, Edgewood Road, and Brittan Avenue due to distance, topographic conditions, intervening vegetation, and structures. Thus, project implementation would have no impact to scenic vistas.

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

No Impact: According to the General Plan EIR and Caltrans, there are no Officially Designated or Eligible State Scenic Highways in the City. The nearest Officially Designated State Scenic Highway is a segment of I-280, located approximately 2.82 miles to the southwest of the project site. Views of the project site are not readily afforded from I-280 due to distance, topographic conditions, intervening vegetation, and structures. Thus, the project would not substantially damage scenic resources within a State scenic highway. No impact would occur in this regard.

c) *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (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, as defined by CEQA Guidelines Section 15387, and is completely surrounded by development on all sides. Thus, for the purposes of this threshold, the following analysis evaluates the project's potential to conflict with applicable zoning and other regulations governing scenic quality.

The project site is currently designated as Planned Industrial and zoned as IH. The IH district includes various lot and density, building form and location, transitional, and landscaping development standards related to scenic quality. Table 1, Municipal Code Governing Scenic Quality Consistency Analysis, provides a consistency analysis of the proposed project and relevant IH district development standards.

Table 1.
Municipal Code Governing Scenic Quality Consistency Analysis

Applicable Municipal Code Development Standards	Project Consistency Analysis
Municipal Code Section 18.07.030, Development Standards	
Lot and Density Standards	
Minimum Lot Size (sq. ft.) 20,000	Consistent: The proposed project is located on an approximately 73,524 square-foot lot. As such, the proposed project would exceed the minimum lot size requirement and be consistent with this development standard.
Minimum Lot Width (ft.) 75	Consistent: The project site exceeds the minimum lot width of 75 feet. As such, the proposed project would be consistent with this development standard.
Building Form and Location	
Maximum Height (ft.) 50(A)	Consistent: The proposed facility would have a maximum height of 42 feet. As such, the proposed project would be consistent with this development standard.
Minimum Setbacks (ft.) <i>Front: 5, 10 along arterials</i> <i>Interior Side: 0(A)</i> <i>Street Side: 5</i> <i>Rear: 0(A)</i> <i>Maximum Floor Area Ratio (FAR): 2.0</i> <i>Project Sites of More Than One Acre (FAR): 1.0</i>	Consistent: The proposed project would include a 46-foot, 5-inch front setback; a 61-foot, 10-inch interior side (east) setback; a 6-foot, 2-inch interior side (west) setback; and a 9-foot, 5-inch rear setback. The project site is an approximately 73,524 square-foot site, which would be developed with a new one-story, 48,370-square-foot automobile repair facility. Thus, the proposed project would include a Floor Area Ratio (FAR) of 0.65 FAR (48,370 square feet divided by 73,524 square feet). As such, the proposed project would be consistent with this development standard.
Municipal Code Section 18.07.040, Supplemental Regulations	
A. Landscaping	
A minimum of ten percent (10%) of the site must be landscaping.	Consistent: The project site is an approximately 73,524 square-foot site, of which approximately 11,775 square feet would be landscaped. As such, the proposed project would result in approximately 16 percent landscaping on-site and the proposed project would be consistent with this development standard.
C. Sidewalks	
Sidewalks shall be provided if none already exist or if the existing sidewalks are in poor condition.	Consistent: The proposed project would provide new sidewalks along Commercial Street right-of-way. As such, the proposed project would be consistent with this development standard.
D. Parking Location	
Parking shall be located at the side or rear of the buildings whenever possible. - Customer parking should be located near the office area. - 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.	Consistent: The on-site parking lot would be located along the eastern boundary of the project site (along the eastern side of the proposed building) and would be accessed via the northern-most driveway located in the northeastern corner of the site. Primary pedestrian access to the facility's main entrance, which leads to the office area, would be located in the northeastern corner of the site (i.e., adjacent

Table 1.
Municipal Code Governing Scenic Quality Consistency Analysis

Applicable Municipal Code Development Standards	Project Consistency Analysis
	to the proposed parking lot). As such, the proposed project would be consistent with this development standard.
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.	Consistent: New curbs cuts would be included as part of the proposed project. Specifically, curb cuts would be located at the project's ingress and egress points (i.e., the two new driveways located along Commercial Street). The northern-most driveway would serve as the main driveway and provide primary site access for staff, visitors, and deliveries. The southern-most driveway would serve as a secondary driveway and provide restricted access for Pacific Gas and Electric (PG&E) and generator maintenance personnel only. More specifically, the northern-most driveway would provide access to the proposed parking lot, loading zone (two [2] loading spaces), and vehicle bays, and the southern-most driveway would provide access to the proposed service yard. As such, the proposed project would be consistent with this development standard.
F. Access Location	
Access shall be provided from a side street or alley wherever possible.	Consistent: Refer to Response to Municipal Code Section 18.07.040(E) above.

Source: City of San Carlos, San Carlos Municipal Code, current through Ordinance 1624, passed June 9, 2025; compiled by CSG, 2025.

The project site is also located within the Vision Plan area. Projects within the Vision Plan area are required to meet superior design (including site design) requirements, demonstrate that they encourage environmental preservation, provide a substantial public benefit, and enhance both the character and environment of the area. Table 11, Vision Plan Principles Consistency Analysis, provides a consistency analysis of the proposed project and relevant Vision Plan design requirements; refer to Section 3.11, Land Use and Planning.

As analyzed in Tables 1 and 11, the project would be consistent with applicable Municipal Code development standards and Vision Plan design requirements governing scenic quality and impacts would be less than significant.

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

Less Than Significant Impact: The project site is located in a well-lit urbanized area of the City where moderate levels of ambient nighttime lighting currently exist, including street lighting, vehicular headlights along Commercial Street, architectural and security lighting, and indoor building illumination. Due to the architectural design and building material of the existing one-story industrial buildings, glare is not a prominent occurrence on-site.

Construction

Project construction could involve temporary glare impacts as a result of construction equipment and materials. However, based on the project's limited scope of activities, these sources of glare would not be substantial, and thus, would result in less than significant impacts regarding short-term construction-related glare. Additionally, the project would comply with Municipal Code Section 9.30.070, Exempt activities, for allowable construction hours, which are limited to between 8:00 a.m. and 5:00 p.m. on weekdays (Monday through Friday), and 9:00 a.m. and 5:00 p.m. on Saturdays. No construction is allowed on Sundays. Thus, as no construction activities would be permitted after 5:00

p.m. on weekdays and Saturdays, or on Sundays, short-term construction-related impacts to nighttime lighting would be less than significant.

Operation

The proposed project may increase lighting at the project site compared to existing conditions. However, the light and glare intensity caused by the proposed development would be similar to that generated by existing industrial and commercial uses near the site. The project would be required to comply with the exterior lighting, security lighting, and shielded lighting requirements outlined in Municipal Code Section 18.15.070, Lighting and illumination, which requires all luminaries be directed or shielded so as not to be directly visible from any dwelling unit or to cause off-site glare or nuisance.

The project's exterior building materials are anticipated to consist of wide, durable, flat vertical metal panels with projected fins and glazed storefront-style windows with framed metal. If not properly treated, these materials could result in increased daytime glare. However, the project would be subject to a Design Review Permit pursuant to Municipal Code Chapter 18.29, Design review and objective design standards compliance review. This regulatory procedure would review the project's building materials to ensure neighboring uses are not exposed to substantial daytime glare. As such, impacts would be less than significant in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to aesthetics; therefore, no mitigation measures are required.

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – 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. 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. 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?	☐	☐	☐	☒

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to agriculture and forestry resources include:

- California Department of Conservation Farmland Mapping and Monitoring Program (FMMP)
- Williamson Act/California Land Conservation Act
- California Public Resources Code Sections 12220(g) and 4526
- Government Code Section 51104(g)
- 2045 General Plan Reset Environmental Impact Report (General Plan EIR)
- San Carlos 2030 General Plan (General Plan)

Environmental Setting

According to the General Plan and General Plan EIR, the City of San Carlos (City) is located in an urbanized setting and does not contain agricultural and forestry resources. Furthermore, according to the California Department of Conservation, the project site is designated as Urban and Built-Up Land.⁵ The project site is zoned Heavy Industrial (IH). The project site is not covered under a Williamson Act contract.⁶

- a) *Would the project 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?***

No Impact: According to the California Department of Conservation and General Plan EIR, the City, including the project site, is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland).⁷ As such, project implementation would not convert farmland to a non-agricultural use. No impact would occur in this regard.

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

No Impact: The project site is zoned IH and is not covered under a Williamson Act contract.⁸ Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur in this regard.

- c) *Would the project 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))?***

No Impact: The project site is zoned IH. Thus, project implementation would not conflict with existing zone for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. No impact would occur in this regard.

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

No Impact: Refer to Response 3.2(c). No impact would occur in this regard.

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

No Impact: Refer to Responses 3.2(a) through 3.2(d). No impact would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to agriculture and forestry resources; therefore, no mitigation measures are required.

⁵ California Department of Conservation. 2022. California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed September 29, 2025.

⁶ California Department of Conservation. 2023. California Williamson Act Enrollment Finder, <https://gis.conservation.ca.gov/portal/home/webmap/viewer.html?webmap=18f7488c0a9d4d299f5e9c33b312f312>. Accessed September 29, 2025.

⁷ California Department of Conservation. 2022. California Important Farmland Finder, <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed September 29, 2025.

⁸ California Department of Conservation. 2023. California Williamson Act Enrollment Finder, <https://gis.conservation.ca.gov/portal/home/webmap/viewer.html?webmap=18f7488c0a9d4d299f5e9c33b312f312>. Accessed September 29, 2025.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – 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. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The information presented in this analysis is primarily based on the 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California (AQ/GHG/Energy Study), prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Regulatory Setting

Federal Regulations

The United States Environmental Protection Agency (EPA) sets national ambient air quality standards (NAAQS) and emission standards for mobile sources, which include on-road (highway) motor vehicles such as trucks, buses, and automobiles, and non-road (off-road) vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). The EPA also sets nationwide fuel standards.

In the past 20 years, the EPA has established a number of emission standards for on-road and non-road heavy-duty diesel engines used in trucks and other equipment, in particular because diesel engines are a significant source of nitrogen oxides (NO_x) and particulate matter, and given the EPA has identified diesel particulate matter (DPM) as a probable carcinogen. Implementation of the heavy-duty diesel on-road vehicle standards and the non-road diesel engine standards are estimated to reduce particulate matter and NO_x emissions from diesel engines up to 95 percent in 2030 when the heavy-duty vehicle fleets are completely replaced with newer heavy-duty vehicles that comply with these emission standards.

In concert with the diesel engine emission standards, the EPA has also substantially reduced the amount of sulfur allowed in diesel fuels. The sulfur contained in diesel fuel is a significant contributor to the formation of particulate matter in diesel-fueled engine exhaust. The current standards limit the amount of sulfur allowed in diesel fuel to 15 parts per million by weight (ppmw). Ultra-low sulfur diesel (ULSD), as it is referred to, is required for use by all vehicles in the United States.

The federal diesel engine and diesel fuel requirements mentioned above have been adopted by California, in some cases with modifications making the requirements more stringent or the implementation dates sooner.

State Regulations

The California Air Resources Board (CARB) has set statewide ambient air quality standards (CAAQS) and emission standards for on-road and off-road mobile sources that are more stringent than those adopted by the EPA. Several of these regulatory programs affect medium and heavy-duty diesel trucks that represent the bulk of DPM emissions from California highways. These regulations include the solid waste collection vehicle (SWCV) rule, in-use public and utility fleets, and the heavy-duty diesel truck and bus regulations. In 2008, CARB approved a regulation to reduce emissions of DPM and NO_x from on-road heavy-duty diesel fueled vehicles. The regulation requires affected vehicles to meet specific performance requirements between 2014 and 2023, with all affected diesel vehicles required to have 2010 model-year engines or equivalent by 2023. Advanced Clean Cars and Advanced Clean Cars II (ACC II) will require all new cars and light trucks sold in California to be zero-emission vehicles by 2035.

CARB has also adopted and implemented regulations to reduce DPM and NO_x emissions from in-use (existing) and new off-road heavy-duty diesel vehicles (e.g., loaders, tractors, bulldozers, backhoes, off-highway trucks, etc.). The regulations apply to diesel-powered off-road vehicles with engines capable of producing 25 horsepower (hp) or greater. The regulations are intended to reduce particulate matter and NO_x exhaust emissions by imposing limits on idling, requiring vehicles to be reported to CARB's DOORS online reporting system, restricting the addition of older vehicles into fleets, banning older tiered engines, requiring owners to turn over their fleet (i.e., replacing older equipment with newer equipment), or retrofitting existing equipment in order to achieve specified fleet-averaged emission rates. Implementation of this regulation, in conjunction with stringent federal off-road equipment engine emission limits for new vehicles, significantly reduces emissions of DPM and NO_x in order to help reduce the health risk throughout California.

To address the issue of diesel emissions in California, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Diesel Risk Reduction Plan). In addition to requiring more stringent emission standards for new on-road and off-road mobile sources to reduce particulate matter emissions by 90 percent (related to stationary diesel-fueled engines), a significant component of the Diesel Risk Reduction Plan involves application of emission control strategies to existing diesel vehicles and equipment. Many of the measures of the Diesel Risk Reduction Plan have been approved and adopted, including the federal on-road and non-road emission standards for new diesel engines, as well as adoption of regulations for ULSD fuel in California.

Regional and Local Regulations

Bay Area Air District

The Bay Area Air District or Bay Area Air Quality Management District (herein referenced as "Air District" or "BAAQMD") has jurisdiction over an approximately 5,600-square mile area, commonly referred to as the San Francisco Bay Area (Bay Area). The Air District's boundary encompasses the nine San Francisco Bay Area counties, including the counties of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, Napa, Solano, and Sonoma.

The Air District is the lead agency in developing plans to address attainment and maintenance of the NAAQS and CAAQS. The Air District also has permit authority over most types of stationary equipment utilized for the proposed project. The Air District is responsible for permitting and inspection of stationary sources; enforcement of regulations, including setting fees, levying fines, and enforcement actions; and ensuring that public nuisances are minimized.

The Air District's Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks associated with exposures to outdoor toxic air contaminants (TACs) in the Bay Area. The program examines TAC emissions from point sources, area sources, and on-road and off-road mobile sources with an emphasis on diesel exhaust, which is a major contributor to airborne health risk in California. The CARE program is an on-going program that encourages community involvement and input. The technical analysis portion of the CARE program has been

implemented in three phases that includes an assessment of the sources of TAC emissions, modeling and measurement programs to estimate concentrations of TAC, and an assessment of exposures and health risks. Throughout the program, information derived from the technical analyses has been used to develop emission reduction activities in areas with high TAC exposures and high density of sensitive populations. Risk reduction activities associated with the CARE program are focused on the most at-risk communities in the Bay Area. Seven areas have been identified by the Air District as impacted communities, including Eastern San Francisco, Richmond/San Pablo, Western Alameda, San José, Vallejo, Concord, and Pittsburgh/Antioch. The project site is not located within an Air District CARE area.

Overburdened communities are areas located: 1) within a census tract identified by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen), implemented by the Office of Environmental Health Hazard Assessment (OEHHA), as having an overall score at or above the 70th percentile; or 2) within 1,000 feet of any such census tract. The Air District has identified several overburdened areas within its boundaries. The project site is not within an overburdened area as the project site has an overall score at the 31st percentile on CalEnviroScreen.

Furnaces and Boilers and Water Heaters

In 2023, the Air District adopted the proposed amendments to Rules 9-4 and 9-6 that are intended to reduce emissions of NO_x from residential and commercial water heaters. These amended rules would affect Bay Area households and businesses that use natural gas appliances by, essentially, prohibiting the installation of new natural gas-fired furnaces and water heaters. The rules require appliances that do not emit NO_x. Currently, the only zero-NO_x appliances available are electric appliances. Implementation begins in 2027, where only zero-NO_x water heaters can be sold or installed. In 2029, only zero-NO_x furnaces can be sold or installed. Lastly, in 2031, only zero-NO_x large commercial heaters can be sold or installed. Note that electric appliances would have zero emission of other criteria pollutants and zero emissions of direct greenhouse gas (GHG).

Bay Area Air District CEQA Air Quality Guidelines

In June 2010, the Air District adopted thresholds of significance to assist in the review of projects under the California Environmental Quality Act (CEQA). In 2023, the Air District revised the CEQA Air Quality Guidelines (Air District CEQA Guidelines) that include significance thresholds to assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The current Air District guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process consistent with CEQA requirements including thresholds of significance, mitigation measures, and background air quality information. The current Air District guidelines include assessment methodologies for criteria air pollutants, air toxics, odors, and GHG emissions; refer to Table 2, Bay Area Air District CEQA Significance Thresholds. Air quality impacts and health risks are considered potentially significant if impacts exceed these thresholds.

The Air District recommends all projects include a “basic” set of best management practices (BMPs) to manage fugitive dust and consider impacts from dust (i.e., fugitive PM₁₀ and PM_{2.5}) to be less than significant if BMPs are implemented. The Air District strongly encourages enhanced BMPs for construction sites near schools, residential areas, other sensitive land uses, or if air quality impacts are determined to be significant.

Table 2.
Bay Area Air District CEQA Significance Thresholds

Criteria Air Pollutant	Construction Thresholds		Operational Thresholds	
	Average Daily Emissions (lbs./day)		Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54		54	10
NO _x	54		54	10
PM ₁₀	82 (Exhaust)		82	15
PM _{2.5}	54 (Exhaust)		54	10
CO	Not Applicable		9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices (BMPs)*		Not Applicable	
Health Risks and Hazards	Single Sources/ Individual Project		Combined Sources (Cumulative from all sources within 1000-foot zone of influence)	
Excess Cancer Risk	>10 in a million	OR Compliance with Qualified Community Risk Reduction Plan	>100 in a million	OR Compliance with Qualified Community Risk Reduction Plan
Hazard Index	>1.0		>10.0	
Incremental annual PM _{2.5}	>0.3 µg/m ³		>0.8 µg/m ³	
Greenhouse Gas Emissions				
Land Use Projects – (Must Include A or B)	A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation a. Achieve a reduction in project-generated 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. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).			

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Notes: ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. GHG = greenhouse gases.

* Bay Area Air District strongly recommends implementing all feasible fugitive dust management practices especially when construction projects are located near sensitive communities, including schools, residential areas, or other sensitive land uses.

San Carlos 2030 General Plan (General Plan)

The General Plan's Environmental Management Element includes policies and actions intended to reduce exposure of the City's sensitive population to air pollution, toxic air contaminants, and GHG emissions. The following policies are applicable to the proposed project:

- Policy EM-6.1: Support and comply with the Air District, State and federal standards and policies that improve air quality in the Bay Area.
- Policy EM-6.2: Support and encourage commercial uses to adopt environmentally friendly technologies and reduce the release of pollutants.
- Policy EM-6.3: Support the reduction of emissions of particulates from wood burning appliances, construction activity, automobiles, trucks and other sources.
- Policy EM-6.6: Air District recommended measures to reduce PM₁₀ and exhaust emissions associated with construction shall be applied to new development in San Carlos.
- Policy EM-7.1: Take appropriate action to address climate change and reduce greenhouse gas emissions.
- Policy EM-7.3: Participate in regional, State, and federal efforts to reduce greenhouse gas emissions and mitigate the impacts resulting from climate change.
- Policy EM-7.6: Support greenhouse gas (GHG) emission reduction measures and climate change resiliency strategies that are cost effective and help create an environmentally sustainable, livable, and equitable community. The cost of implementation to the City and private sector shall be considered prior to the adoption of any GHG reduction strategy.

Environmental Setting

Ambient Air Quality Standards

The Federal and California Clean Air Acts have established ambient air quality standards for different pollutants. NAAQS were established by the Federal Clean Air Act of 1970 (amended in 1977 and 1990) for six "criteria" pollutants. These criteria pollutants now include carbon monoxide (CO), ozone (O₃), nitrogen dioxide (NO₂), respirable particulate matter with a diameter less than 10 microns (PM₁₀), sulfur dioxide (SO₂), and lead (Pb). In 1997, the EPA added fine particulate matter (PM_{2.5}) as a criteria pollutant. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. CAAQS include the NAAQS pollutants and also hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles. These additional CAAQS pollutants tend to have unique sources and are not typically included in environmental air quality assessments. In addition, lead concentrations have decreased dramatically since this criteria pollutant was removed from motor vehicle fuels. The Bay Area has attained the CO standard and monitoring data from the last 30 years that shows relatively low concentrations throughout the Bay Area. Therefore, CO is not an air quality issue for several land uses, including the proposed project.

Project Air Quality Conditions

The project site is located in San Mateo County, which is in the San Francisco Bay Area Air Basin (SFBAAB). Ambient air quality standards have been established at both the federal and State levels. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}).

Air Pollutants of Concern

There are two categories of pollutants analyzed for CEQA compliance; criteria pollutants and TACs. Criteria pollutants are those which have ambient air quality standards established by either the federal government (i.e., EPA) or the

state government. TACs are pollutants that are known to either increase cancer risk or have non-cancer health impacts in high concentrations.

Criteria Pollutants – Ozone and Particulate Matter

High ozone concentrations in the air basin are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form O₃. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ambient O₃ concentrations. The highest O₃ concentrations in the Bay Area occur in the eastern and southern inland valleys downwind of existing air pollutant sources. High O₃ concentrations aggravate respiratory and cardiovascular diseases, reduce lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant in the SFBAAB. Particulate matter is assessed and measured in terms of PM₁₀ and PM_{2.5}. Elevated concentrations of PM₁₀ and PM_{2.5} are the result of both region-wide emissions and localized emissions. High particulate matter concentrations aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children. Due to the adverse health effects caused by PM_{2.5} exposure even at low concentrations, the Air District has developed health risk thresholds to address exposure to increased PM_{2.5} concentrations caused by projects.

Toxic Air Contaminants

TACs are a broad class of compounds known to cause morbidity or mortality, often because they cause cancer. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., DPM near a freeway). Because chronic exposure of TACs can result in adverse health effects, they are regulated at the federal, State, and regional levels.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about seventy percent of the cancer risk from TACs (based on the Bay Area average). According to CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects from diesel exhaust exposure a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by CARB, and are listed as carcinogens either under California's Proposition 65 or under the Federal Hazardous Air Pollutants programs. Health risks from TACs are estimated using OEHHA's risk assessment guidelines, which were published in February of 2015 and incorporated into the Air District's CEQA guidance.

PM_{2.5} emissions can include TACs. Due to the adverse health effects caused by PM_{2.5} exposure even at low concentrations, the Air District developed assessing methods and health risk thresholds to address exposure to increased concentrations caused by project PM_{2.5} emissions.

Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16 years of age, people over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. For cancer risk assessments, infants and children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The closest sensitive receptors to the project site are the residences along Hall Street, located over 1,000 feet away to the northwest. However, due to the project's proximity to nearby businesses, worker receptors are included in the analysis below. It should be noted that the proposed project would not introduce new sensitive receptors to the project area.

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

Less Than Significant Impact: The Air District is the regional agency responsible for overseeing compliance with federal and State laws, regulations, and programs within the SFBAAB. The Air District, with assistance from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), prepare and implement plans to meet the applicable laws, regulations, and programs. In particular, the most recent and comprehensive plan is the Bay Area 2017 Clean Air Plan (Clean Air Plan). The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure, protect public health, reduce GHG emissions, and protect the climate. The Air District has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, the Air District relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs.

The Clean Air Plan, adopted by the Air District in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Guidance provided in the Air District CEQA Guidelines recommend that plans show consistency with the control measures listed in the Clean Air Plan. At the project-level, there are no consistency measures or thresholds provided in the Air District CEQA Guidelines. The proposed project is a small industrial development that would not introduce any substantial sources of air pollutants. Thus, the proposed project would not conflict with the most recent Clean Air Plan planning efforts since: 1) the project would have emissions below the Air District's thresholds (refer to Response 3.2[b] below); and 2) the project would be considered urban infill. Impacts would be less than significant in this regard.

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

Less Than Significant Impact: The Bay Area is considered a non-attainment area for ground-level O₃ and PM_{2.5} under both the NAAQS and CAAQS. The area is also considered non-attainment for PM₁₀ under the CAAQS, but not the NAAQS. The area has attained both federal and State ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O₃, PM_{2.5}, and PM₁₀, the Air District has established thresholds of significance for these air pollutants and their precursors. The O₃ precursor pollutant thresholds are for ROG and NO_x, while PM₁₀, and PM_{2.5} have specific thresholds. The thresholds apply to both construction period emissions and operational period emissions. The California Emissions Estimator Model (CalEEMod) Version 2022 was used to estimate emissions from construction activities and project operation.

Construction Emissions

CalEEMod was used to estimate emissions from project construction that include on-site construction activity, construction vehicle trips, and evaporative emissions. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The CalEEMod model output along with construction inputs are included in Appendix A of this Initial Study.

CalEEMod Modeling

Land Use Inputs

The proposed project land uses were entered into CalEEMod as described in Table 3, Project Land Uses Entered into CalEEMod.

Table 3.
Project Land Uses Entered into CalEEMod

Project Land Uses	Size	Units	Square Feet (sf)	Acreage
Automobile Care Center	48.4	1,000-sf	48,370	1.69
Parking Lot	6	Parking Spaces	-	

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Construction Inputs

CalEEMod computes annual emissions for construction that are based on the project type, size, and acreage. The model provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. The construction build-out scenario, including the equipment quantities, average hours per day, total number of workdays, and schedule, were based on a blend of information provided by the applicant and CalEEMod defaults; refer to Appendix A. The earliest possible start date for construction would be January 2026 and would be built out over a period of approximately 19 months, or 414 construction workdays. The earliest year of operation was assumed to be 2028.

Construction Truck Traffic Emissions

Construction would produce traffic in the form of worker trips and truck traffic. The traffic-related emissions are based on worker and vendor trip estimates produced by CalEEMod and haul trips that were computed based on the amount of demolition material to be exported, soil imported and/or exported to the site, and the amount of asphalt and cement truck trips to and from the site. CalEEMod provides daily estimates of worker and vendor trips for each applicable phase. Daily haul trips for demolition were estimated by CalEEMod using the provided demolition and soil import/export values volumes. The provided amounts of asphalt and concrete were converted to daily one-way trips, assuming two trips per delivery. These values are shown in the project construction equipment worksheet included in Appendix A.

Summary of Computed Construction Emissions

Average daily emissions were annualized for each year of construction by dividing the annual construction emissions by the number of active workdays during that year. Table 5, Construction Period Emissions – Uncontrolled, shows the uncontrolled average daily construction emissions of ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the project. As indicated in Table 5, the predicted uncontrolled average project construction emissions would not exceed the Air District's significance thresholds during any year of construction.

Table 4.
Construction Period Emissions - Uncontrolled

Year	ROG	NOx	PM ₁₀ Exhaust	PM _{2.5} Exhaust
Construction Emissions (Tons)				
2026	0.06	0.54	0.02	0.02
2027	0.32	0.61	0.02	0.02
Average Daily Construction Emissions (pounds/day)				
2026 (261 construction workdays)	0.46	4.12	0.14	0.13
2027 (153 construction workdays)	4.23	8.01	0.24	0.22
Air District Thresholds (pounds per day)	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Exceed Threshold?	No	No	No	No

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Construction Fugitive Dust Impacts

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site deposit mud on local streets, which is an additional source of airborne dust after it dries. The Air District recommends all projects include a “basic” set of BMPs to manage fugitive dust and considers impacts from dust (i.e., fugitive PM₁₀ and PM_{2.5}) to be less than significant if BMPs are implemented to reduce these emissions. The project would be required to conform with General Plan Policy EM-6.6 which would implement the Air District’s basic BMPs to control dust during construction activities.

General Plan Policy EM-6.6: BMPs for Construction Dust Suppression

During any ground disturbance as part of construction activities, the applicant shall ensure that the project contractor implements measures to control dust. Implementation of the measures recommended by the Air District, which are listed below, would result in less than significant impacts associated with grading and new construction. The contractor must implement the following BMPs required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
9. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Effectiveness of General Plan Policy EM-6.6

General Plan Policy EM-6.6's measures above are consistent with the Air District's recommended basic BMPs for reducing fugitive dust contained in the Air District CEQA Guidelines. For this analysis, only the basic set of BMPs are required as the project emissions and PM_{2.5} impacts would be below the Air District's thresholds. Enhanced BMPs would be required only if air quality impacts were found to be significant.

Operational Emissions

ROG, PM, and NO_x emissions from the project would be generated primarily from autos driven by future employees. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are also typical ROG emission sources from these types of land uses. CalEEMod was used to estimate emissions from operation of the proposed project assuming full build-out.

CalEEMod Inputs

Land Uses

The project's land uses were input to CalEEMod as described above for the construction period modeling.

Model Year

Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest year of full operation would be 2028 if construction begins in 2026. Emissions associated with build-out later than 2028 would be lower.

Traffic Information

The project-specific daily trip generation rate provided by the traffic consultant was entered into the CalEEMod model. Once operational, the project would produce approximately 37 daily trips. The daily trip generation for employee trips was calculated by conservative estimates based on operational characteristics described in the project description. The daily trip generation for trucks was based on the ITE Trip Generation Manual's 11th Edition. The Saturday and Sunday trip rates were derived by multiplying the ratio of the CalEEMod default rates for Saturday and Sunday trips to the default weekday rate with the project-specific daily weekday trip rate. The analysis included that approximately five (5) of the traffic trips would be made by heavy-duty trucks and thirty-two (32) of the trips would be made by light duty automobiles. The fleet mix was adjusted in CalEEMod to represent this fleet mix. In CalEEMod, the five (5) heavy-duty truck trips (13.5 percent) were assigned to the HHD (Heavy Heavy-Duty Truck) category while the thirty-two (32) light-duty automobile trips were split in half between the LDA (43.2 percent) and LDT2 (43.2 percent) categories to cover passenger cars (LDA) and pickup trucks/SUVs (LDT2) that could be operated by employees. All other trip types were set to zero. The default trip lengths and trip types specified by CalEEMod were used.

Energy

CalEEMod defaults for energy use were used which include the 2019 Title 24 Building Standards. These defaults are conservative, as the project would need to meet the more stringent and latest Title 24 Building Standards. GHG emissions modeling includes those indirect emissions from electricity consumption. The default electricity produced emission rate was utilized in CalEEMod. An emission factor of 99.983 pounds of CO₂ per megawatt of electricity produced is the Pacific Gas and Electric (PG&E) default in CalEEMod.

The proposed project would not include any natural gas infrastructure. Specifically, the applicant has confirmed the building would be all electric. Therefore, natural gas use for the project land uses was set to zero and reassigned to electricity use in CalEEMod.

Project Generator

The project would include one diesel-powered emergency generator located on the southern corner of the project site. The generator would produce a maximum of 100 kilowatts (kW) and is assumed to be powered by a 135-hp diesel-fired engine. The generator would be tested periodically and power the building in the event of a power failure. For modeling purposes, it was assumed that the generator would be operated for testing and maintenance purposes as well as non-testing purposes per the Air District's CEQA Guidelines. CARB and the Air District requirements limit the engine operations to fifty (50) hours each per year for testing and maintenance, and new Air District CEQA Guidelines recommend including one hundred (100) hours each year for non-testing and non-maintenance operations. During testing periods, the engine would typically run for less than one (1) hour. The engine would be required to meet CARB and EPA emission standards and consume commercially available California low-sulfur diesel fuel. Additionally, the generator would have to meet Air District Best Available Control Technology for Toxics (BACT) requirements for IC Engine-Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump sources. The emissions from operation of the generator were calculated using CalEEMod.

Other Inputs

Default model assumptions for emissions associated with solid waste generation and water use were applied to the project. Wastewater treatment was estimated to be 100 percent aerobic conditions to represent the City's wastewater treatment plant conditions. The project site would not send wastewater to on-site septic tanks or facultative lagoons.

Existing Uses

Two (2) existing industrial buildings with associated surface parking are currently situated on the project site. The 33,707-square-foot industrial buildings generate approximately 93 daily trips as estimated by the traffic consultant. CalEEMod defaults were used to estimate energy use emissions, including emissions from natural gas usage, and solid waste generation. Emissions from wastewater use were based on 100 percent aerobic treatment to represent wastewater treatment plant conditions. The CalEEMod model inputs and output for the existing facility are included in Appendix A Attachment 1, CalEEMod Modeling Inputs and Outputs.

Summary of Computed Operational Emissions

Annual emissions were predicted using CalEEMod and daily emissions were estimated assuming 365 days of operation. Table 5, Operational Period Emissions, shows uncontrolled net average daily operational emissions of ROG, NO_x, total PM₁₀, and total PM_{2.5} during operation of the project. Operational period emissions would not exceed the Air District's significance thresholds.

Table 5.
Operational Period Emissions

Scenario	ROG	NO _x	PM ₁₀	PM _{2.5}
2028 Project Operational Emissions (<i>tons/year</i>)	0.27	0.09	0.03	0.01
Existing Facility Emissions (<i>tons/year</i>)	0.22	0.11	0.11	0.03
Net Operational Emissions (<i>tons/year</i>)	0.05	-0.02	-0.08	-0.02
<i>Air District Thresholds (tons /year)</i>	<i>10 tons</i>	<i>10 tons</i>	<i>15 tons</i>	<i>10 tons</i>
<i>Exceed Thresholds?</i>	No	No	No	No
2028 Daily Project Operational Emissions (<i>lbs./day</i>) ¹	0.29	-0.12	-0.44	-0.12
<i>Air District Thresholds (lbs./day)</i>	<i>54 lbs.</i>	<i>54 lbs.</i>	<i>82 lbs.</i>	<i>54 lbs.</i>
<i>Exceed Threshold?</i>	No	No	No	No

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Notes: ¹Assumes 365-day operation.

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

Less Than Significant Impact: Project impacts related to increased health risk can occur by generating emissions of TACs and air pollutants. The proposed project would introduce new sources of TACs during construction (e.g., on-site construction and truck hauling emissions) and operation (e.g. mobile sources and generators). Project construction activities would generate dust and equipment exhaust that would affect nearby worker receptors. The project would include stationary sources and would generate some traffic consisting of mostly light-duty gasoline-powered vehicles, which would produce TAC and air pollutant emissions.

Project impacts to existing worker receptors are analyzed below for temporary construction activities and long-term operational conditions. It should be noted that there are several sources of existing TACs (i.e., construction and truck hauling emissions and mobile sources and generators) and localized air pollutants in the vicinity of the project area (i.e., from the surrounding commercial and industrial developments). The impact of existing sources of TACs are analyzed in terms of the cumulative risk which includes the project's contribution.

Health Risk Methodology

Health risk impacts are analyzed by predicting increased cancer risk, the increase in annual PM_{2.5} concentrations, and by computing the Hazard Index (HI) for non-cancer health risks. The HI risk impacts from the project are the combination of risks from construction and operational sources. These sources include on-site construction activities, construction truck hauling, operation of an emergency generator, and increased traffic from the project. To evaluate the increased cancer risks from the project, a 30-year exposure period was used, per Air District guidance, with the worker receptors being exposed to both project construction and operation emissions during this timeframe.

The project's increased cancer risk is computed by summing the project construction cancer risk and operation cancer risk contributions. Unlike the increased maximum cancer risk, the annual PM_{2.5} concentration and HI values are not additive but based on the annual maximum values for the entirety of the project. The project maximally exposed individual (MEI) is identified as the receptor(s) that is/are the most impacted by the project's construction and operations.

The methodology for computing health risks impacts is contained in Appendix E of the Air District CEQA Guidelines. TAC and PM_{2.5} emissions are calculated using a dispersion model to estimate ambient pollutant concentrations, and cancer risks and HI are calculated using DPM concentrations.

Modeled Sensitive Receptors

Receptors include locations where populations would be present for extended periods of time (i.e., chronic exposures). This includes the existing businesses near the site as shown in Figure 1, Locations of Construction Project Site, Project Generator, Off-Site Worker Receptors, and Maximum TAC Impact [MEI]), included as Appendix A of this Initial Study. Worker receptors are analyzed to include adults only with almost continuous exposure to project emissions. While there are additional worker receptors within 1,000 feet of the project site, the receptors chosen are adequate to identify maximum impacts from the proposed project. There are no sensitive receptors within 1,000 feet of the project site.

Health Risk from Project Construction

The primary health risk impact issues associated with construction projects are cancer risks associated with diesel exhaust (i.e., DPM), which is a known TAC, and exposure to high ambient concentrations of dust (i.e., PM_{2.5}). DPM poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project's construction activities was conducted that evaluates potential health effects to nearby worker receptors from construction emissions of DPM and PM_{2.5}. This assessment included dispersion modeling to predict the off-site

concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be estimated.

Construction Emissions

The CalEEMod model provided total uncontrolled annual PM₁₀ exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. Total DPM emissions were estimated to be 0.04 tons (72 pounds) and controlled fugitive dust emissions (PM_{2.5}), assuming application of General Plan Policy EM-6.6, to be 0.01 tons (11 pounds) from all construction stages. The on-road emissions are a result of haul truck travel during grading activities, worker travel, and vendor deliveries during construction activities. A trip length of one mile was used to represent vehicle travel while at or near the construction site. It was assumed that the emissions from on-road vehicles traveling at or near the site would occur at the construction site.

Dispersion Modeling

The EPA AMS/EPA Regulatory Model (AERMOD) dispersion model was used to predict concentrations of DPM and PM_{2.5} concentrations at worker receptors in the vicinity of the project construction area. The AERMOD dispersion model is an Air District-recommended model for use in modeling analysis of these types of emission activities for CEQA projects. Emission sources for the construction site were grouped into two categories: exhaust emissions of DPM and fugitive PM_{2.5} dust emissions.

Construction Sources

To represent the construction equipment exhaust emissions, an area source was used with an emission release height of twenty (20) feet (6 meters). The release height incorporates both the physical release height from the construction equipment (i.e., the height of the exhaust pipe) and plume rise after it leaves the exhaust pipe. Plume rise is due to both the high temperature of the exhaust and high velocity of the exhaust gas. It should be noted that when modeling an area source, plume rise is not calculated by the AERMOD dispersion model as it would do for a point source (exhaust stack). Therefore, the release height from an area source used to represent emissions from sources with plume rise, such as construction equipment, was based on the height the exhaust plume is expected to achieve, not just the height of the top of the exhaust pipe.

For modeling fugitive PM_{2.5} emissions, a near-ground level release height of seven (7) feet (2 meters) was used in an area source. Fugitive dust emissions at construction sites come from a variety of sources, including truck and equipment travel, grading activities, truck loading (with loaders) and unloading (rear or bottom dumping), loaders and excavators moving and transferring soil and other materials, etc. All of these activities result in fugitive dust emissions at various heights at the point(s) of generation. Once generated, the dust plume would tend to rise as it moves downwind across the site and exit the site at a higher elevation than when it was generated. For these reasons, a seven (7) foot release height was used as the average release height across the construction site. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area sources.

AERMOD Inputs and Meteorological Data

The modeling used a five (5)-year meteorological data set (2011-2015) from the San Carlos Airport prepared for use with the AERMOD model by the Air District. Construction emissions were modeled as occurring Monday through Friday between 7:00 a.m. to 5:00 p.m., according to the applicant's provided construction schedule. Annual DPM and PM_{2.5} concentrations from construction activities during the 2026 - 2027 period were calculated at nearby worker receptors using the model. A receptor height of 5 feet (1.5 meters) was used to represent the breathing height on the first floor of nearby businesses.

Health Risks from Project Operation

Operation of the project would have long-term emissions from mobile sources (i.e., traffic) and stationary sources (i.e., emergency generator). While these emissions would not be as intensive at or near the site as construction activity, these emissions could contribute to long-term effects to nearby worker receptors.

Project Traffic

Diesel powered vehicles are the primary concern with local traffic-generated TAC impacts. This project would generate 37 daily trips with a majority of the trips being from light-duty gasoline-powered vehicles (i.e., passenger cars). In addition, the project is not anticipated to generate large amounts of truck trips (only 5 truck trips per workday) that would involve diesel vehicles. It should be noted that the proposed project would only require 5 truck trips per quarter (i.e., every three months); however, to provide a conservative analysis, the project's CalEEMod model assumed a greater truck trip frequency. In either of the truck trip frequency scenarios, the proposed project would not result in significant TAC emissions from mobile sources. Emissions from project traffic are considered negligible and thus, not analyzed in the AQ/GHG/Energy Study.

Project Generator

The proposed project would include one (1) emergency generator located in the southern corner of the project site. The generator would provide up to 100-kW powered by a 135-hp diesel-powered engine. The location of the modeled generator is shown in AQ/GHG/Energy Study Figure 1, included as Appendix A of this Initial Study.

Operation of the diesel generator would be a source of TAC emissions. The generator would be tested periodically and would power the building in the event of a power failure. For modeling purposes, it was assumed that the generator would be operated for testing and maintenance purposes. During testing periods (i.e., up to once per month), the engine would typically run for less than one (1) hour. CARB and the Air District's requirements limit the engine operations to fifty (50) hours each per year for testing and maintenance. The engine would be required to meet CARB and EPA emission standards and consume commercially available California low-sulfur diesel fuel. Additionally, the generator would have to meet Air District BACT requirements for IC Engine-Compression Ignition: Stationary Emergency, non-Agricultural, non-direct drive fire pump sources. The emissions from the operation of the generator were calculated using CalEEMod.

The diesel engine would be subject to CARB's Stationary Diesel Airborne Toxics Control Measure (ATCM) and require permits from the Air District, since the diesel engine would be equipped with an engine larger than 50-hp. BACT requirements would apply to the generator that would limit DPM emissions. As part of the Air District permit requirements for toxics screening analysis, the engine emissions would have to meet BACT and pass the toxic risk screening level of less than ten in a million. The risk assessment would be prepared by the Air District. Depending on results, the Air District would set limits for DPM emissions (e.g., more restricted engine operation periods). Sources of air pollutant emissions complying with all applicable Air District regulations generally would not be considered to have a significant air quality health risk impact.

Dispersion Modeling

To estimate potential increased cancer risks and PM_{2.5} impacts from operation of the generator, the same AERMOD dispersion model was utilized to compute the maximum annual DPM concentration at off-site worker receptors (i.e., nearby businesses). Emissions of DPM were based on PM₁₀ exhaust emissions predicted by CalEEMod for operation of the project generator. The same receptors, breathing heights, and meteorological data used in the construction dispersion modeling were used for the generator modeling. Stack parameters (stack height, exhaust flow rate, and exhaust gas temperature) for modeling the generator were based on Air District default parameters for emergency generators. Annual average DPM and PM_{2.5} concentrations were modeled assuming that generator testing could occur at any time of the day (24 hours per day, 365 days per year).

Computed Cancer and Non-Cancer Health Impacts

To calculate the increased cancer risk from the generator, the cancer risks were adjusted for exposure duration to account for construction for the first two (2) years, while the operational exposure duration was adjusted for the remaining twenty-eight (28) years of the thirty (30) year exposure period. Table 6, Project Health Risk Impacts at the Off-Site MEI, lists the health risks from the project generator at the location of the MEI. The emissions and health risk calculations for the proposed generator are included in Attachment 2, Project Construction Emissions and Health Risk Calculations, included as Appendix A of this Initial Study.

Summary of Project-Related Health Risks at the Off-Site MEI

The maximum increased cancer risks were calculated using the modeled TAC concentrations combined with the Air District CEQA guidance for age sensitivity factors and exposure parameters. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Adult only exposures were assumed at all worker receptors included as part of this analysis.

Non-cancer health hazards and maximum PM_{2.5} concentrations were also calculated. The maximum modeled annual PM_{2.5} concentration was calculated based on combined exhaust and fugitive concentrations. The maximum computed HI value was based on the ratio of the maximum DPM concentration modeled and the chronic inhalation DPM reference exposure level of 5 µg/m³. The annual PM_{2.5} concentration and HI values are based on an annual maximum risk for the entirety of the proposed project.

The project risk impacts are the combination of construction and operation sources. For the proposed project, these sources include on-site construction activity and a diesel-powered generator. The project's impact is computed by adding the construction cancer risk for a worker to the increased cancer risk for the project operational conditions for the generator over a 30-year period. The project MEI is identified as the worker receptor that is most impacted by the project's construction and operational activities.

The maximum modeled annual DPM and PM_{2.5} concentrations were identified at nearby worker receptors (refer to Figure 1, included as Appendix A of this Initial Study) to find the MEI. Results of this assessment indicate that the project MEI was located on the first floor (5 feet above ground) of a worker receptor southwest of the project site. Table 6 summarizes the maximum cancer risks, PM_{2.5} concentrations, and HI for project activities at the MEI. Appendix A of this Initial Study includes the emission calculations used for the construction area source modeling, generator modeling, and the cancer risk calculations.

Project health risk impacts are shown in Table 7. As shown, none of the project's health risks or hazard impacts exceed any of the Air District's single-source significance thresholds.

Table 6.
Project Health Risk Impacts at the Off-Site MEI

Source		Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Project Construction (Years 0 – 2)	Uncontrolled	0.38 (adult)	0.11	0.01
Project Generator (Years 2 – 30)		0.01	<0.01	<0.01
Project Total/Maximum Impact	Uncontrolled	0.39	0.11	0.01
Air District Single-Source Threshold		>10.0	>0.3	>1.0
Exceed Threshold?	Uncontrolled	No	No	No

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Cumulative Health Risks of all TAC Sources at the Off-Site Project MEI

Health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of a project site (i.e., influence area). These sources include railways, highways, busy surface streets, and stationary sources identified by the Air District.

A review of the project area using the Air District's geographic information systems (GIS) screening maps identified the existing health risks from nearby roadways, railways, and stationary sources at the MEI. Local roadways, the railways, one (1) nearby development, and fifteen (15) existing stationary sources of TACs were identified with the potential to affect the project MEI. Figure 2, Locations of Project Site, MEI, and Nearby TAC and PM_{2.5} Sources, included as Appendix A of this Initial Study, shows the sources affecting the MEI. Health risk impacts from these sources upon the MEI are reported in Table 7, Impacts from Combined Sources at the Project MEI. Details of the cumulative screening, modeling, and health risk calculations are included in Appendix A of this Initial Study.

Nearby Roadways and Railways

The project site is located near Highway 101, multiple intersecting streets, and Caltrain (refer to Figure 2, included as Appendix A of this Initial Study). Cancer risk, PM_{2.5} concentrations, and HI associated with traffic on the nearby roadways/highways and with rail activity from Caltrain were estimated using the Air District's screening values provided via GIS data files (i.e., raster files). The Air District raster files provide screening-level cancer risk, PM_{2.5} concentrations, and HI for roadways and rail lines within the Bay Area. These risk values were computed using AERMOD and 20x20-meter emissions grid. The raster file uses EMFAC2021 data for vehicle emissions and fleet mix for roadways, 2021 train schedules and 2020 fuel consumption rates for rail activities, and includes Appendix E of the Air District's CEQA Guidelines for risk assessment assumptions. These estimates represent conservative risks reflective of 2022 conditions and are meant to provide a conservative estimate of future conditions, which do not reflect the increased proportion of zero emission motor vehicles that would result in lower future emissions or the planned electrification of Caltrain that began in the fall of 2024. These screening values are considered higher than values that would be obtained with refined modeling methods, especially for worker receptors with adult only exposures. These raster data are based on region-wide emissions rather than just those that occur within 1,000 feet of the project site. More information regarding the assumptions used to develop the screening layers can be found in Sections 6 and 7 in Appendix E of the Air District's CEQA Guidelines.

The Peninsula Corridor Electrification Project is a key component of the Caltrain Modernization Program that would electrify the Caltrain Corridor from San Francisco to San Jose. Caltrain plans are that initial service between San José and San Francisco would use a mixed fleet of electric and diesel locomotives, with approximately 75 percent of the service being electric and 25 percent being diesel. After the initial implementation period, diesel locomotives would be replaced with electric trains over time as they reach the end of their service life. Caltrain's diesel-powered locomotives would continue to be used to provide service between the San José Diridon Station and Gilroy. It is expected that all of the San José to San Francisco fleet would be electric trains about five to eight years after initial electric service begins.

When considering the health risk impacts from diesel locomotive freight trains, the reduction in risk due to electrification of the Caltrain line would be approximately 72 percent. The railway cancer risk reported by the Air District (for pre-electrification of Caltrain) at the off-site MEI has been reduced by 72 percent to match this finding. Further reductions would occur if the railway was dispersion modeled and the exposure sensitivity adjusted for adult only exposures. Screening-level cancer risk, PM_{2.5} concentration, and HI for the cumulative roadway and railway impacts at the MEI are listed in Table 7.

Air District Permitted Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using the Air District's Permitted Stationary Sources 2022 GIS website, which identifies the location of nearby stationary sources and their estimated

risk and hazard impacts, including emissions and adjustments to account for OEHHHA guidance. Fifteen (15) sources were identified using this tool, including seven (7) that had no data and were treated as a “generic case” for worst-case risk screening purposes, seven (7) emergency diesel generators, and one (1) gasoline dispensing facility (GDF). Source #5337 was located further than 1,000 feet away, and was therefore not included in the cumulative analysis. The Air District GIS website provided screening risks and hazards for the generic sources and diesel generators but not the GDF. A stationary source information request was submitted to the Air District in order to estimate health risk impacts from the GDF.

The screening risk and hazard levels provided by the Air District for the stationary sources were adjusted for distance using the Air District’s Distance Adjustment Multiplier Tool for Generic Sources and Diesel Internal Combustion Engines. For the GDF, the CARB’s Gasoline Station Risk Screening Tool was used. The Air District provided the gasoline throughput for the GDF near the project site. The provided throughput along with the distance between the receptors and the GDF, and the region for the gas station was input into the CARB tool to calculate the cancer risk and hazard index. Health risk impacts from the stationary sources upon the MEI are reported in Table 7.

Construction Risk Impacts from Nearby Developments

A review of the City’s Development Projects webpage indicates that the following approved projects are located near the proposed project:

- Alexandria Center for Life Science (ACLS) – This project is located across Commercial Street from the proposed project and off-site MEI. The ACLS is approved to build a science and technology campus on a 25.34-acre site bounded by Industrial Road to the east, Commercial Street to the north, Old County Road to the west, and Pulgas Creek to the south. In total, the project would construct 1,734,532 square feet of life science office space spread across six (6) buildings, two (2) parking garages, and a surface parking lot. Some green space and other public amenities are also included in this project. This project was analyzed by Illingworth & Rodkin, Inc. and is currently entitled, but has not been approved for construction at the time of this Initial Study. As a result, construction of the proposed project could overlap with construction, including the hauling of construction materials, of the ACLS.

The mitigated construction risks and hazard impact values for the ACLS was available from its air quality technical report. For the purpose of this analysis, it was conservatively assumed that the project MEI would be present for the entirety of the construction of the ACLS and that the risks upon the MEI for the ACLS also occur at this project’s off-site MEI. This approach likely provides an overestimate of the health risk and hazard levels because it assumes residential exposure that begins with infant sensitivities rather than a worker with adult only sensitivities. The mitigated construction risks reported in that air quality assessment were included in the cumulative risks Table 7.

Summary of Cumulative Health Risk Impact at the Off-Site MEI

Table 7 reports both the project and cumulative health risk impacts at the worker receptors most affected by the project (i.e., the MEI). As shown, the project does not exceed any single-source or cumulative-source Air District significance threshold.

Table 7.
Impacts from Combined Sources at the Project MEI

Source		Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Project Impacts				
Project Total/Maximum Impact	Uncontrolled	0.39	0.11	0.01
<i>Air District Single-Source Threshold</i>		<i>>10.0</i>	<i>>0.3</i>	<i>>1.0</i>
Exceed Threshold?	Uncontrolled	No	No	No
Cumulative Impacts				
Cumulative Roadways – Air District GIS Screening Data		7.80	0.22	0.03
Cumulative Railways – Air District GIS Screening Data, Adjusted for Electrification		11.55	0.05	0.01
Royalite Manufacturing Inc (Facility ID #10925, Manufacturing), MEI at +1,000 feet.		0.00	0.00	0.00
CEMEX Construction Materials Pacific LLC (Facility ID #2939, Manufacturing), MEI at 665 feet.		0.51	0.00	0.01
Superior Body Shop (Facility ID #3763, Other Services (except Public Administration), MEI at +1,000 feet.		0.00	0.00	0.00
Nxedge San Carlos (Facility ID #20582, Manufacturing), MEI 710 feet.		0.78	<0.01	0.00
City of San Carlos (Facility ID #20952, Generator), MEI at +1,000 feet.		0.00	0.00	0.00
Sutro BioPharma (Facility ID #21826, Generator), MEI at 315 feet.		1.93	<0.01	0.00
Caliber Collision Center (Facility ID #23794, Other Services (except Public Administration), MEI at 715 feet.		0.00	0.00	0.00
Grove Construction (Facility ID #24886, Administrative and Support and Waste Management and Remediation Services), MEI at 190 feet.		0.11	0.00	0.00
Alexandria Real Estate (Facility ID #201718, Generator), MEI at 770 feet		3.96	0.01	<0.01
ARE - San Francisco No 63 LLC (Facility ID #25193, Generator), MEI at 810 feet.		0.44	<0.01	0.00
City of San Carlos - Corporation Yard (Facility ID #108501, Generator), MEI at 825 feet.		0.56	<0.01	0.00
ARE-San Francisco No 62 LLC (Facility ID #24278, Generator), MEI at 520 feet.		0.04	0.00	0.00
City of San Carlos - Corporation Yard (Facility ID #24469, Generator), MEI at 660 feet.		0.07	0.00	0.04
MBC Bio Labs (Facility ID #108501-1, Gas Dispensing Facility), MEI at 975 feet.		<0.01	0.00	0.00
Construction Risks from Nearby Developments				
Alexandria Center for Life Science – Includes Project Construction and Heavy-Duty Truck Hauling Risks		6.06	0.04	0.01
Cumulative Total	Uncontrolled	34.21	<0.47	<0.12
<i>Air District Cumulative Source Threshold</i>		<i>>100</i>	<i>>0.8</i>	<i>>10.0</i>
Exceed Threshold?	Uncontrolled	No	No	No

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

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

Less Than Significant Impact: Project construction activities could result in localized odorous emissions from diesel exhaust associated with construction equipment. Because of the temporary nature of these emissions and the highly diffusive properties of diesel exhaust, exposure of worker receptors to these emissions would be limited. Therefore, odors from construction that could cause complaints from the public and affect a substantial number of people are not expected. Operation of the proposed project is not expected to result in a substantial quantity of odors that would adversely affect a substantial number of people. As such, less than significant impacts would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to air quality; therefore, no mitigation measures are required.

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
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?	☐	☐	☐	☒

The information presented in this analysis has been supplemented with the Tree Inventory and Protection Report For 930 Commercial Street LLC, 930 Commercial Street in San Carlos, CA 94070 (Arborist Report), prepared by Ned Patchett Consulting, dated July 22, 2025; refer to Appendix B, Arborist Report.

Regulatory Setting

Regulations at the federal and local levels applicable to the proposed project related to biological resources include:

- Federal Migratory Bird Treaty Act (MBTA)
- San Carlos 2030 General Plan (General Plan)
- San Carlos Municipal Code (Municipal Code)

Environmental Setting

The project site is located within a built-out, urbanized area of the City of San Carlos (City) and is entirely disturbed, supporting minimal on-site vegetation. According to General Plan Figures 6-1, Vegetation and Habitat Types, and 6-2, Wetlands and Waterbodies, no riparian habitat or other sensitive natural communities, State or federally protected wetlands, or wildlife corridor or nursery sites for native or migratory species are located within the site.⁹ It should be noted that the project site is located approximately 0.15 miles to the northwest of Pulgas Creek, which supports areas of riparian habitat and could function as a wildlife corridor or nursery site for native or migratory species. Furthermore, the on-site trees and off-site street trees located along Commercial Street could provide suitable nesting habitat for migratory birds. According to the California Department of Fish and Wildlife (CDFW), the project site is not located within an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).¹⁰

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

No Impact: The project site is located within a built-out, urbanized area of the City and is currently occupied by two (2) single-story industrial buildings, two (2) asphalt parking lots, and ornamental landscaping. The on-site ornamental landscaping supports minimal vegetation, with shrubs and six (6) ornamental trees located along the Commercial Street frontage and one (1) ornamental tree located in the westernmost asphalt parking lot. It is also acknowledged that one (1) street tree is located along the Commercial Street right-of-way.

Based on the project site's disturbed nature and lack of native vegetation, project construction would not adversely impact candidate, sensitive, or special-status biological resources. Furthermore, as depicted on General Plan Figure 6-3, Known Occurrences of Sensitive Species and Habitat, no listed or sensitive habitat or known candidate, sensitive, or special-status biological resources are located within the project area. Thus, no impact would occur in this regard.

- b) *Would the project 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?***

No Impact: Riparian habitats are those occurring along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies, known to provide habitat for sensitive animal or plant species, or known to be important wildlife corridors.

The project site is currently developed and located in an urbanized and built-out area of the City, and does not support areas of riparian habitat or other sensitive communities. However, it should be noted that the project site is located approximately 0.15 miles to the northwest of Pulgas Creek, which supports areas of riparian habitat. Nonetheless, due to the distance and intervening development, the proposed project's construction and operational activities would not impact Pulgas Creek. Thus, the proposed project would not impact riparian habitat or other sensitive natural communities and no impact would occur in this regard.

⁹ U.S. Fish and Wildlife Service, *National Wetlands Inventory*, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed October 7, 2025.

¹⁰ California Department of Fish and Wildlife, August 2023, *California Natural Community Conservation Plans*, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed October 7, 2025.

- c) ***Would the project 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?***

No Impact: No State or federally protected wetlands are located within the project site.¹¹ Further, according to General Plan Figure 6-2, no jurisdictional wetlands and waters are present in the project vicinity. As such, the project would not involve direct removal, filling, hydrological interruption, or other direct or indirect impact on wetlands. No impact would occur in this regard.

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

Less Than Significant Impact: The project site is entirely disturbed and surrounded on all sides by existing urban uses, and does not provide suitable connectivity or habitat to function as a wildlife corridor or habitat. Although the project site itself does not provide suitable connectivity or habitat to function as a wildlife corridor or habitat, the project site is located approximately 0.15 miles to the northwest of Pulgas Creek, which could function as a wildlife corridor or nursery site for native or migratory species. However, due to the distance and intervening development, terrestrial connectivity to the project site from Pulgas Creek is inhibited. . Nonetheless, the on-site trees and off-site street trees located along Commercial Street could provide suitable nesting habitat for migratory birds. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, or nests. Mandatory compliance with the MBTA would reduce the project's potential construction-related impacts to nesting birds. Impacts would be less than significant in this regard.

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

Less Than Significant Impact: Municipal Code Chapter 18.18, Landscaping (Tree Ordinance), contains regulations on tree, bush, and grass planting, removal, and maintenance. Moreover, pursuant to Municipal Code Section 18.18.070(B), Definitions, significant trees are defined as trees at least eleven (11) inches in diameter, outside of bark, and measured at 54 inches above natural grade. Heritage trees are defined as indigenous trees at least nine (9) inches in diameter, including California buckeye, madrone, coast live oak, valley oak, blue oak, interior live oak, redwood, and California bay laurel, as measured at 54 inches above natural grade. Protected trees are defined as significant or heritage trees, any tree as part of a replacement requirement, any tree as part of an approved development permit, or any tree as part of an approved landscaping plan.

As discussed in Response 3.4(a), the on-site ornamental landscaping supports minimal vegetation, with shrubs and six (6) ornamental trees located along the Commercial Street frontage and one (1) ornamental tree located in the westernmost asphalt parking lot. As analyzed in the Arborist Report, six (6) of the on-site ornamental trees are classified as significant trees and one (1) of the ornamental trees is classified as a non-protected tree. Additionally, the one (1) street tree located along Commercial Street right-of-way is classified as a significant tree. As such, the proposed project would require a protected tree removal permit for the removal of the seven (7) significant trees pursuant to Municipal Code Section 18.18.070(F), Protected Tree Removal Permit and Decision-Making Criteria. Furthermore, Municipal Code Section 18.18.070(C), Trees, and Municipal Code Section 18.18.070(F)(6), Conditions and Replacement Trees, would require the planting of one (1) tree for every 5,000 square feet of lot coverage within industrial districts and the replacement of significant trees at a one-to-one ratio, respectively. The proposed project would plant twenty-six (26) new trees on-site and six (6) new street trees along Commercial Street right-of-way; and

¹¹ U.S. Fish and Wildlife Service, *National Wetlands Inventory*, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed October 7, 2025.

thus, would comply with the tree replacement requirements of Municipal Code Section 18.18.070(C) and Municipal Code Section 18.18.070(F)(6). Upon permit approval and compliance with the tree replacement requirements, construction of the proposed project would not conflict with any local policies protecting biological resources, including the Tree Ordinance. As such, less than significant impacts would occur in this regard.

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

No Impact: According to the CDFW, the project site is not located within an adopted HCP or NCCP.¹² No other approved local, regional, or State habitat conservation plan applies to the site. Thus, development of the proposed project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. No impact would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to biological resources; therefore, no mitigation measures are required.

¹² California Department of Fish and Wildlife, August 2023, *California Natural Community Conservation Plans*. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed October 7, 2025.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The information presented in this analysis has been supplemented with the 930-940 Commercial St., San Carlos Historic Resource Evaluation (Historic Resources Evaluation), prepared by Preservation Architecture, dated October 3, 2025; refer to Appendix C, Historic Resources Evaluation.

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to cultural resources include:

- California Register of Historical Resources (CRHR)
- California Public Resources Health and Safety Code Sections 7050.5 through 7055
- California Public Resources Code Section 5097.98
- San Carlos 2030 General Plan (General Plan)

Environmental Setting

Historical Resources

According to the Historic Resources Evaluation, the earliest identifiable transaction of the 930 Commercial Street property was in 1954, when the parcel was deeded by the Land Development and Investment Company to Otto and Marie Scheu. General research shows that the Scheus were listed in the San Francisco directories, and Otto Scheu was identified as a butcher in 1930 within U.S. census records. Based on a 1975 parcel map for the western adjoining property, the 930 Commercial Street property was then still owned by Marie Scheu when the 930 Commercial Street property was first developed. The subsequent owners of the 930 Commercial Street property were Donald and Carol Tanklage and their descendants. In 2022, 930 Commercial Street LLC acquired the property and has owned the property since the initial acquisition. A 1956 aerial first depicts the 930 Commercial Street building, by which time Commercial Street was extended easterly to the newly created Industrial Avenue and the property was developed with the 930 Commercial Street building. No specific records were found for the 930 Commercial Street building's origins. Thus, for the purposes of this analysis and based on available aerials, the 930 Commercial Street building is conservatively assumed to have been constructed circa 1956.

The first directory listing for the 930 Commercial Street building followed in 1958 under the business name Heieck & Moran plumbing supplies. A 1968 Sanborn map depicts the circa 1956 930 Commercial Street building as a plumbing supplies warehouse, and the open west side lot a "pipe yard." The earliest permit records for the 930 Commercial Street building date to 1979 for alterations under the ownership of Tanklage Properties, the tenancy identified as

“plumbing supplies.” Per phone directories, subsequent pre-2000 tenancies included: Moran plumbing supply (1963), Heieck Supply (plumbing supply) (1970 to 1987), and Hajoca Corporation (plumbing supply) (1992). In 1997, a conditional use permit was issued by the City of San Carlos (City) to the Northwestern Equipment and Supply Company, which included new uses that concluded the original plumbing supply business that tenanted the building for 30 years, following which there have been a range of light industrial and commercial uses. On June 17, 2019, the City issued a conditional use permit to Elliot Spear, Rev Fitness, for the operation of a commercial recreation facility.¹³ According to the Historic Resources Evaluation, the 940 Commercial Street building was permitted in late 1980 and its construction completed in July 1981.

The 930 Commercial Street building is an approximately 20-foot-tall, 14,639 square-foot metal building. The 930 Commercial Street building’s architectural features consist of metal clad panels for the exterior side walls, rear walls, and gabled roof. Along the building’s Commercial Street frontage, the building consists of a tall, rectilinear and articulated concrete masonry unit (CMU) façade with a front entry door at its western end. Lower and plain CMU walls are located on each side, from which angled elements prop the taller façade. Beyond which, each side wall has three loading doors distributed along their lengths. Per the only early permit records, those doors were replaced in 1979, when the overall site was improved, including the eastern parking. Overall, the 930 Commercial Street building’s primary façade design can be loosely labeled Mid-Century Modern, and the remainder of the overall building can be labeled as highly utilitarian. The 940 Commercial Street building is an approximately 19-foot-tall, 19,068-square-foot concrete building, which exhibits highly utilitarian design, similar to the 930 Commercial Street building. It should be noted that the 940 Commercial Street building does not possess exceptional design or construction qualities; refer to the Historic Resources Evaluation.

Archaeological Resources/Human Remains

According to the General Plan, remnants of the early inhabitants are limited as there are only a few known archaeological sites in the City located primarily near the banks of Cordilleras Creek and Pulgas Creek. Although the project site is located approximately 0.15 miles to the northwest of Pulgas Creek, the project site is currently disturbed and is located within a heavily urbanized and built-out area of the City.

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

No Impact: According to the General Plan, no known historic resources occur within the project area. Nonetheless, as part of the Historic Resources Evaluation, a review of the on-site buildings (i.e., the 930 Commercial Street building and 940 Commercial Street building) and their setting was conducted through the collection and review of applicable records, including a recent environmental report, historic maps and aerial views, historic telephone directories, building permit records from the City, and building permit records from the County of San Mateo. The Historic Resources Evaluation provides a historic resources evaluation to determine whether the project could result in a significant adverse change to unknown historic resources in accordance with the California Environmental Quality Act (CEQA).

Pursuant to CEQA, which applies to the CRHR evaluation criteria, historic resources are generally greater than 50 years of age. While the historic evaluation and listing of more recent resources is permitted, such resources must be of exceptional importance and must show that sufficient time has passed in order to understand potential historic importance. It should be noted that 45 years of age is a recommended threshold for which properties and their buildings should be evaluated as potential historic resources. The 930 Commercial Street building is greater than 45 years of age, while the 940 Commercial Street building does not exceed this threshold. As such, only the 930

¹³ City of San Carlos, Conditional Use Permit, 930 Commercial Street (Parcel Number 046-161-030), San Carlos, CA 94070, <https://www.smartviewonline.net/root/Druid/BBB9F597-29AC-4115-B28E-6EE4B2FCCC01>, accessed October 18, 2025.

Commercial Street building is analyzed below for eligibility with the CRHR. For the purposes of CEQA, the 940 Commercial Street building is not considered a historic resource.

To be eligible for listing with the CRHR, a resource must be age-eligible (or have potential exceptional importance) and be determined to be historically significant at the local, State, or national level, under one or more of the following four criteria.

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- **Criterion 2:** It is associated with the lives of people important to local, California, or national history.
- **Criterion 3:** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic value.
- **Criterion 4:** It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The following includes an evaluation of the existing 930 Commercial Street building for its eligibility with the CRHR based on Criterion 1 through Criterion 4 listed above.

Criterion 1

In the post-World War II development context, there is no potential historical significance associated with the existing warehousing use or 930 Commercial Street building, which generally fits a far-ranging post-war development pattern. Furthermore, no specific events of historic consequence are identifiably associated with this former plumbing supply warehouse. As there is no evidence, individually or collectively, of any historic events directly associated with the project site, the 930 Commercial Street building and property do not meet CRHR Criterion 1.

Criterion 2

Few individuals are identifiably associated with the project site in its potential historical period (Circa 1956 to 1980), and there is at present no specific evidence of the property owners associated with the original development of the 930 Commercial Street building. While the early-20th century originator of the properties, K. A. Winter, may have been a noteworthy and likely, wealthy person, there is no evidence that he is a person of historic importance, neither did he have any direct association to the existing mid-20th century development on the Commercial Street block. As summarized above, the identified owners of the 930 Commercial Street building and property at the time of its original development were Otto and Marie Scheu, who retained ownership for some two decades yet who have no identifiable historic importance. The other associated persons were Donald and Carole Tanklage, who were developers and contractors, predominately of industrial properties in eastern San Carlos along with a small number of other developments on which Tanklage Construction was the identified contractor. While Tanklage Construction acquired the property in the late 1970s and developed the 940 Commercial Street building in the early 1980s, they were not responsible for developing the 930 Commercial Street building.

In conclusion, there is no evidence that any of the owners or any other indirectly associated person that, early on, tenanted the 930 Commercial Street building, have any identified historic importance relative to the 930 Commercial Street building and property. Consequently, the 930 Commercial Street building and property do not meet CRHR Criterion 2.

Criterion 3

In its historic architectural context, the 930 Commercial Street building is a generic light-industrial type structure with an appended and minor architectural facade. The 930 Commercial Street building lacks distinction in terms of mid-20th century design and construction, as there are no inventive, unique, prototypical or distinctive design forms,

building systems or materials. Rather, it predominately exhibits utilitarian and expeditious construction and design. Further, no evidence has been found to identify any original engineers, architects or designers. Lastly, while this built resource directly interrelated with surrounding mid-20th century development, there is no evidence of any planning or design interrelationships. Additionally, the post-war development context has been substantially altered by way of the recent removal of numbers of neighboring mid-20th century industrial resources. As the 930 Commercial Street building does not embody any design or construction distinction in terms of type, period, region or methods; as it is not the work of any identified architect, engineer, designer or builder; nor does it embody any artistic values; the 930 Commercial Street building does not meet CRHR Criterion 3.

Criterion 4

As analyzed above, the 930 Commercial Street building and property have not yielded and do not appear to have the potential to yield any historical information beyond the present historical record. Thus, the 930 Commercial Street and property do not meet CRHR Criterion 4.

Overall, the 940 Commercial Street building is not considered a historic resource. Moreover, the 930 Commercial Street building and property do not meet any applicable CRHR criteria and thus are not eligible with the CRHR. As such, the 930 and 940 Commercial Street buildings and property are not a historical resource as defined by CEQA Guidelines Section 15064.5(a). Project implementation would not cause a substantial adverse change in the significance of a historical resource. No impacts would occur in this regard.

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

Less Than Significant Impact With Mitigation Incorporated: Given the nature of the project area and the disturbed nature of the project site, no cultural resources are expected to occur on-site. However, the site could contain previously undiscovered archaeological resources. Project construction activities would involve approximately 300 cubic yards of cut. Thus, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. Should project excavation activities encounter previously undiscovered archaeological resources, MM-CUL-1 would require all construction work to halt until a qualified archaeologist evaluates the find. With the implementation of MM-CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be reduced to less than significant levels.

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

Less Than Significant Impact: As mentioned above, remnants of early inhabitants and known archaeological sites within the City are limited primarily to areas near the banks of Cordilleras Creek and Pulgas Creek. Although the project site is located approximately 0.15 miles to the northwest of Pulgas Creek, the project area is developed and built-out (i.e., has been subject to prior ground-disturbance and/or earth removal for grading purposes). Thus, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, project construction activities would involve approximately 300 cubic yards of cut. Thus, project excavation could potentially encounter previously undiscovered buried human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws. California Health and Safety Code Sections 7050.5 through 7055 describe the general provisions for human remains. Specifically, California Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site.

As required by State law, the requirements and procedures outlined in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County of San Mateo Coroner (County Coroner), notification of the Native American Heritage Commission (NAHC), and consultation with the individual identified by

the NAHC to be the most likely descendant. If human remains are found during excavation, excavation must immediately stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains would be less than significant.

MITIGATION MEASURES

MM-CUL-1 Archaeological Resources Inadvertent Discovery

If previously unidentified cultural resources are encountered during ground-disturbing activities, all work within 50 feet of the discovery shall immediately halt, and a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology, shall be retained by the project applicant to evaluate the find. If the discovery proves to be significant under the California Environmental Quality Act (CEQA), additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts. If an identified cultural resource is of Native American origin, the qualified archaeologist shall consult with the project Applicant and the City of San Carlos to implement Native American consultation procedures. Construction shall not resume until the qualified archaeologist states in writing to the City of San Carlos Current Planning Division that the proposed construction activities would not significantly damage any archaeological resources.

3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – 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?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The information presented in this analysis is primarily based on the 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California (AQ/GHG/Energy Study), prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Regulatory Setting

Many federal, State, and local statutes and policies address energy conservation.

Federal Regulations

At the federal level, energy standards apply to numerous products (e.g., the EnergyStar program) and transportation (e.g., fuel efficiency standards).

State Regulations

At the State level, the Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6, of the California Code of Regulations (CCR), promote efficient energy use in new buildings constructed in California. The standards regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for new construction (new buildings and expansions) in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of minimum guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels. Building Energy Efficiency Standards and CALGreen standards are enforced through the local building permit process.

The California Energy Commission (CEC) provides full forecasts for electricity, natural gas, and fuel every two years as part of the Integrated Energy Policy Report (IEPR) process. In 2035, it is estimated that Californians would consume up to 358,738 gigawatt-hours of electricity. Gasoline demand is projected to decline each year through 2030 due to greater numbers of zero-emission vehicles and increasing fuel economy.

California's electric grid relies increasingly on clean sources of energy such as solar, wind, geothermal, hydroelectricity, and biomass. As this transition advances, the grid is also expanding to serve new sectors including electric vehicles, rail, and space and water heating. California's Renewables Portfolio Standard (RPS) is among the most ambitious energy policies in the nation, requiring utilities to produce 60 percent of their retail electricity from clean, renewable sources by 2030. Increasing California's renewable supplies would diminish the State's dependence on fossil fuels for electric power generation.

Environmental Setting

The proposed project is located on an approximately 73,524 square-foot (1.69 acres) site at 930 and 940 Commercial Street. Based on the location of the project site, Pacific Gas and Electric (PG&E) would provide electricity services to the site. It should be noted that the proposed project would not utilize natural gas.

a) **Would the project 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 of the project would require energy for the manufacture and transportation of building materials, preparation and grading of the project site, and construction of the project including the infrastructure. This would be a temporary use of energy. Operation of the project would consume energy.

The primary means of energy consumption would include vehicle travel and electricity usage associated with operating the new industrial building proposed by the project. In addition, there would be indirect electricity usage associated with the conveyance of water supplied to the building and wastewater produced by the building. As described in the AQ/GHG/Energy Study, the CalEEMod model was used to compute air pollutant emissions associated with operation of the project. CalEEMod provides estimated direct electricity usage, while the vehicle trip generation rate was provided by the project’s traffic consultant. The energy usage reflects the project operating under a full build out. It is assumed that all vehicles operated by project workers are gasoline powered even though the project plans to install EV charging capabilities to encourage electric vehicle usage. Table 8, Project Operational Annual Energy Demand, shows the estimated energy demand of the project during operations.

Table 8.
Project Operational Annual Energy Demand

Energy Usage	Estimated Demand	2028 Demand in MM Btu	Source
Electricity	1,148,471 kWh	3,912	CalEEMod
Vehicle Travel (gasoline, diesel and electric vehicles)	79,433 annual miles travelled. Consumption of 2,929 gallons	334	CalEEMod VMT and EMFAC2025 average light duty + heavy heavy-duty truck (HHDT) fuel economy of 27.12 mpg in 2028.
Total Usage		4,246	

Sources: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Illingworth & Rodkin, Inc. CalEEMod modeling, EMFAC2025

Note: 1 gallon of gasoline = 114,000 Btu = 0.114 MM Btu

MM Btu = one million British thermal units, VMT = vehicle miles travelled

As shown in Table 8, the proposed project would result in demand quantities typical of a development project of similar land use and scale and is within California’s anticipated 2028 energy demand quantities. Thus, the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. As such, impacts would be less than significant in this regard.

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

Less Than Significant Impact: The proposed project would be constructed in conformance with at minimum the 2022 CalGreen and the Title 24 Building Codes, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficiency standards. Compliance with these standards ensures

compliance with State and federal plans, policies, and regulations applicable to energy usage. As such, impacts would be less than significant in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to energy; therefore, no mitigation measures are required.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – 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 substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The information presented in this analysis is primarily based on the Geotechnical Investigation, Proposed Automotive Building, 930-940 Commercial Street, San Carlos, California (Geotechnical Investigation), prepared by Rockridge Geotechnical, Inc., dated May 2, 2024; refer to Appendix D, Geotechnical Investigation.

Regulatory Setting

- Paleontological Resources Preservation Act
- California Alquist-Priolo Earthquake Fault Zoning Act
- California Building Standards Code

- California Seismic Hazards Mapping Act
- San Carlos Municipal Code (Municipal Code)

Environmental Setting

Seismicity

According to the Geotechnical Investigation, the site is located within the Coast Ranges Geomorphic Province of California, which is characterized by northwest-trending valleys and ridges. These topographic features are controlled by folds and faults that resulted from the collision of the Farallon and North American plates and subsequent strike-slip faulting along the San Andreas Fault system. The San Andreas Fault is more than 600 miles long and extends from Point Arena to the north to the Gulf of California to the south. The Coast Ranges Geomorphic Province is bounded on the east by the Great Valley and on the west by the Pacific Ocean.

The major active faults in the area are the Monte Vista – Shannon, San Andreas, and San Gregorio faults. These and other faults in the region are shown in Geotechnical Investigation Figure 4, Regional Fault and Historic Seismicity Map. According to Geotechnical Investigation Table 1, Regional Faults and Seismicity, the Monte Vista – Shannon and San Andreas faults are located approximately 5.9 kilometers (3.66 miles) and 6.6 kilometers (4.10 miles) to the southwest of the project site, respectively. Additionally, the San Gregorio fault is located approximately nineteen (19) kilometers (11.81 miles) to the west of the project site. For these and other active faults within a 50-kilometer radius of the site, the distance from the site and estimated characteristic moment magnitude are depicted in Geotechnical Investigation Table 1.

Ground Shaking

The seismicity of the site is governed by the activity of the Monte Vista-Shannon and San Andreas faults, although ground shaking from future earthquakes on other faults could also be experienced on-site. The intensity of earthquake ground motion at the site would depend upon the characteristics of the generating fault, distance to the earthquake epicenter, and magnitude and duration of the earthquake. The Geotechnical Investigation concludes that strong to very strong ground shaking could occur at the site during a large earthquake from one of the nearby faults.

Ground Surface Rupture

Historically, ground surface displacements closely follow the trace of geologically young faults. The project site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active or potentially active faults exist on the project site. The Geotechnical Investigation concludes that the probability of fault offset at the project site from a known active fault is very low. In a seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the Geotechnical Investigation concludes that the probability of surface faulting and consequent secondary ground failure from previously unknown faults is also very low.

Liquefaction and Associated Hazards

When saturated, cohesionless soil liquefies, and experiences a temporary loss of shear strength created by a transient rise in excess pore pressure generated by strong ground motion. Soil susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. Flow failure, lateral spreading, differential settlement, loss of bearing strength, ground fissures and sand boils are evidence of excess pore pressure generation and liquefaction. As shown in Geotechnical Investigation Figure 5, Earthquake Zones of Required Investigation Map, the project site is within a zone of liquefaction potential. However, due to the relatively flat grades in the project area, as well as the depth, relative thickness, and discontinuous nature of the potentially liquefiable layers beneath the project site, the Geotechnical Investigation concludes that the potential of lateral spreading and other types of ground failure associated with liquefaction occurring at the site is low.

Groundwater

The groundwater level at the project site is expected to fluctuate several feet seasonally with potentially larger fluctuations annually, depending on the amount of rainfall. Based on the groundwater levels observed during the Geotechnical Investigation, and based on available groundwater information from the GeoTracker website, and to account for approximate seasonal groundwater fluctuations, the Rockridge Geotechnical Investigation concludes that the project should be designed for a groundwater level at four (4) feet below the existing grade.

Cyclic Densification/Differential Compaction

Cyclic densification (also referred to as differential compaction) of non-saturated sand (sand above groundwater table) can occur during an earthquake, resulting in settlement of the ground surface and overlying improvements. The Geotechnical Investigation concludes that the soil encountered above the groundwater table generally has sufficient cohesion and/or density, such that the potential for cyclic densification to occur at the site in those locations is very low.

Paleontological Resources

Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive from association with human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits in which they were originally buried. Geological formations underlying the City have the potential to contain unique paleontological resources, which may be uncovered during earth moving activities. According to the Geotechnical Investigation, the project area is underlain by Holocene-age alluvium (Qha) soils, with the northern perimeter of the site underlain by artificial fill. More specifically, the site is underlain by clay and silty clay interbedded with layers of clayey sand and silty sand to the maximum depth explored of 80 feet below ground surface (bgs). Given the disturbed and built out nature of the project area, no paleontological resources are expected to occur on-site.

a) *Would the project 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? Refer to Division of Mines and Geology Special Publication 42.*

No Impact: According to the Geotechnical Investigation, no Alquist-Priolo Earthquake Fault Zones traverse the project site, and no known active or potentially active faults exist on the project site. Thus, implementation of the proposed project would not result in the rupture of a known earthquake fault delineated on an Alquist-Priolo Earthquake Zoning Map. No impact would occur in this regard.

ii) *Strong seismic ground shaking?*

Less Than Significant Impact With Mitigation Incorporated: According to the Geotechnical Investigation, the major active faults in the area are the Monte Vista – Shannon, San Andreas, and San Gregorio faults. These and other faults in the region are shown in Geotechnical Investigation Figure 4. According to Geotechnical Investigation Table 1, the Monte Vista – Shannon and San Andreas faults are located approximately 5.9 kilometers (3.66 miles) and 6.6 kilometers (4.10 miles) to the southwest of the project site, respectively. Additionally, the San Gregorio fault is located approximately nineteen (19) kilometers (11.81 miles) to the west of the project site. For these and other active faults within a 50-kilometer radius of the site, the distance from the site and estimated characteristic moment magnitude are depicted in Geotechnical Investigation Table 1. Due to the distance from these faults, the Geotechnical Investigation concludes that strong to very strong ground shaking could occur at the site during a large earthquake from one of the nearby faults.

The project would be required to comply with the California Building Standards Code, which includes earthquake safety standards based on a variety of factors including occupancy type, types of soils and rocks on-site, and strength of probable ground motion at the project site. In accordance with the California Building Standards Code and Municipal Code Chapter 15.04, Technical Building Codes, the project would be required to demonstrate compliance with the site-specific design recommendations identified in the Geotechnical Investigation to minimize the potential for damage and major injury during a seismic event; refer to MM-GEO-1. Implementation of MM-GEO-1 would ensure the construction and design recommendations presented in the Geotechnical Investigation are incorporated into the project design and grading and building plans. Following compliance with the California Building Standards Code and Municipal Code as well as implementation of MM-GEO-1, impacts related to strong seismic ground shaking would be reduced to less than significant levels.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact: As shown in the Geotechnical Investigation, Figure 5, the project site is within a zone of liquefaction potential. However, due to the relatively flat grades in the project area, as well as the depth, relative thickness, and discontinuous nature of the potentially liquefiable layers beneath the project site, the Geotechnical Investigation concludes that the potential of lateral spreading and other types of ground failure associated with liquefaction occurring at the site is low. As such, impacts would be less than significant in this regard.

iv) Landslides?

No Impact: The project site is generally flat with minimal elevation change. Furthermore, the project site is not located within an earthquake-induced landslide zone as depicted in Geotechnical Investigation Figure 5. As such, no impact would occur in this regard.

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

Less Than Significant Impact: Operations of the proposed project would not result in exposure of bare soils, such that the project would result in substantial soil erosion or the loss of topsoil during operations. No impacts are anticipated in this regard. The primary concern in regard to soil erosion or loss of topsoil would be from construction activities associated with the project (e.g., earthwork and grading). Construction activities associated with the project would expose soils to short-term erosion by wind and water. As the project would disturb more than one acre of land, the proposed project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP). Specifically, prior to any activities that may result in pollutants entering a Municipal Separate Storm Sewer System (MS4), the project would be required to prepare a SWPPP for approval by the City Engineer prior to construction. The SWPPP would identify best management practices (BMPs) to be implemented during construction of the project in order to prevent erosion, minimize siltation impacts, and protect water quality. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. With implementation of the SWPPP and its associated BMPs, project construction would result in less than significant impacts involving soil erosion and loss of topsoil.

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

Less Than Significant Impact: Refer to Responses 3.7(a)(iii), 3.7(a)(iv), and 3.7(d) for a discussion concerning the project's impact determinations pertaining to liquefaction, landslides, and expansive soils, respectively.

Lateral Spreading

As discussed in the Geotechnical Investigation, due to the relatively flat grades in the project area, as well as the depth, relative thickness, and discontinuous nature of the potentially liquefiable layers beneath the project site, the potential of lateral spreading and other types of ground failure associated with liquefaction occurring at the site is low. Less than significant impacts would occur in this regard.

Subsidence

According to the United States Geological Survey, the project site is not located within areas of recorded subsidence.¹⁴ Additionally, project-related construction and operational activities do not involve any groundwater removal of other subsidence-causing activities. As such, no impacts would occur in this regard.

- d) *Would the project 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?***

Less Than Significant Impact With Mitigation Incorporated: As discussed in the Geotechnical Investigation, the project site is underlain by clay that is moderately expansive with plasticity indices (PIs) of 16 and 18. Nonetheless, the project would be required to comply with MM-GEO-1, which would ensure the construction and design recommendations in the Geotechnical Investigation are incorporated into the project design, grading, and building plans. With implementation of MM-GEO-1, impacts in this regard would be reduced to less than significant levels.

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

No Impact: No septic tanks or alternative wastewater systems would be constructed as part of the project. The proposed development would connect to existing wastewater infrastructure in the project area. No impact would occur in this regard.

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

Less Than Significant Impact With Mitigation Incorporated: According to the Geotechnical Investigation, the project area is underlain by Qha soils, with the northern perimeter of the site underlain by artificial fill. More specifically, the site is underlain by clay and silty clay interbedded with layers of clayey sand and silty sand to the maximum depth explored of 80 feet bgs. Given the disturbed and built out nature of the project area, no paleontological resources are expected to occur on-site. However, as the project would require excavation of on-site soils for cut and fill purposes, there is the potential to uncover previously undiscovered paleontological resources during earth removal or ground-disturbing activities. In the event paleontological resources are encountered during construction activities, MM-GEO-2 would require all project construction activities to immediately halt until a paleontologist evaluates the find and recommends a course of action should the find be identified as a paleontological resource. With implementation of MM-GEO-2, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be reduced to less than significant levels in this regard.

¹⁴ United States Geological Survey, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed October 12, 2025.

MITIGATION MEASURES

MM-GEO-1 Geotechnical Investigation Recommendations

Prior to issuance of a grading permit, the project applicant shall demonstrate, to the satisfaction of the City of San Carlos Public Works Department and/or City of San Carlos Building Division, that the recommendations for design and construction identified in the Geotechnical Investigation, Proposed Automotive Building, 930-940 Commercial Street, San Carlos, California, prepared by Rockridge Geotechnical, Inc., and dated May 2, 2024, have been incorporated into the project design, grading, and building plans, as applicable.

MM-GEO-2 Unanticipated Discovery of Paleontological Resources

If evidence of subsurface paleontological resources is found during ground-disturbing construction activities, excavation and other construction activities within 50 feet of the find shall immediately cease and the construction contractor shall contact the City of San Carlos Community and Economic Development Director. With direction from the Community and Economic Development Director or his/her designee, the applicant shall retain a paleontologist certified by the County of San Mateo to evaluate the find prior to resuming ground-disturbing activities in the immediate vicinity of the find. If warranted, the paleontologist shall prepare and complete a standard Paleontological Resources Mitigation Program for the salvage and curation of identified resources. The Paleontological Resources Mitigation Program shall be submitted to the City of San Carlos Community and Economic Development Director or his/her designee for review and approval prior to resuming ground-disturbing activities.

3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS – 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 plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The information presented in this analysis is primarily based on the 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California (AQ/GHG/Energy Study), prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Regulatory Setting

Recent Regulatory Actions for GHG Emissions

Executive Order S-3-05 – California GHG Reduction Targets

Executive Order (EO) S-3-05 was signed by Governor Arnold Schwarzenegger in 2005 to set greenhouse gas (GHG) emission reduction targets for California. The three targets established by this EO are as follows: 1) reduce California's GHG emissions to 2000 levels by 2010; 2) reduce California's GHG emissions to 1990 levels by 2020; and 3) reduce California's GHG emissions by 80 percent below 1990 levels by 2050.

Assembly Bill 32 – California Global Warming Solutions Act (2006)

Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, codified the State's GHG emissions target by directing the California Air Resources Board (CARB) to reduce the State's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, California Energy Commission (CEC), California Public Utilities Commission (CPUC), and Building Standards Commission have all been developing regulations that would help meet the goals of AB 32 and Executive Order S-3-05, which has a target of reducing GHG emissions 85 percent below 1990 levels.

The first Scoping Plan for AB 32 was adopted by CARB in December 2008. Its most recent update was completed in December of 2022. It contains the State's main strategies to achieve carbon neutrality by 2045. This plan extends and expands upon the earlier versions with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. It also takes the step of adding carbon neutrality as a science-based guide and touchstone for California's climate work. Measures to achieve carbon neutrality include rapidly moving to zero emission vehicles (ZEV), removing natural gas as an option for space conditioning, increasing the number of solar arrays and wind turbines, and scaling up renewable hydrogen for hard-to-electrify end uses.

Senate Bill 375 – California's Regional Transportation and Land Use Planning Efforts (2008)

California enacted legislation (SB 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 provides incentives for local governments and applicants to implement new conscientiously planned growth patterns. This includes incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows applicants to bypass certain environmental reviews under the California Environmental Quality Act (CEQA) if they build projects consistent with the new sustainable community

strategies. Development of more alternative transportation options that would reduce vehicle trips and vehicle miles traveled (VMT), along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g., the Association of Bay Area Governments and Metropolitan Transportation Commission) to align their regional transportation, housing, and land use plans to reduce VMT and demonstrate the region's ability to attain its GHG reduction targets. A similar process is used to reduce transportation emissions of ozone precursor pollutants in the San Francisco Bay Area.

Senate Bill 350 - Renewable Portfolio Standards

In September 2015, the California Legislature passed Senate Bill 350 (SB 350), which increases the State's Renewables Portfolio Standard (RPS) for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewable target by 2030.

Executive Order B-30-15 & Senate Bill 32 GHG Reduction Targets – 2030 GHG Reduction Target

In April 2015, Governor Brown signed EO B-30-15, which extended the goals of AB 32, setting a GHG emissions target at 40 percent of 1990 levels by 2030. On September 8, 2016, Governor Brown signed Senate Bill (SB) 32, which legislatively established the GHG reduction target of 40 percent of 1990 levels by 2030. In November 2017, CARB issued California's 2017 Climate Change Scoping Plan (2017 Scoping Plan). While the State is on track to exceed the AB 32 scoping plan 2020 targets, this plan is an update to reflect the enacted SB 32 reduction target.

SB 32 was passed in 2016, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. CARB has approved a 2022 Scoping Plan Update (2022 Scoping Plan) to reflect the 2030 target set by EO B-30-15 and codified by SB 32. The 2022 Scoping Plan Update:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as a driving principle.
- Incorporates the contribution of natural and working lands to the State's GHG emissions, as well as its role in achieving carbon neutrality.
- Relies on the most up to date science, including the need to deploy all viable tools, including carbon capture and sequestration as well as direct air capture.
- Evaluates multiple options for achieving our GHG and carbon neutrality targets, as well as the public health benefits and economic impacts associated with each.

The 2022 Scoping Plan lays out how the State can get to carbon neutrality by 2045 or earlier. It is the first scoping plan that adds carbon neutrality as a science-based guide and touchstone beyond statutorily established emission reduction targets.

The mid-term 2030 target is considered critical by CARB on the path to obtaining an even deeper GHG emissions target of 80 percent below 1990 levels by 2050, as directed in EO S-3-05. The 2022 Scoping Plan outlines the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure, providing a blueprint to continue driving down GHG emissions and to not only obtain the Statewide goals, but cost-effectively achieve carbon-neutrality by 2045 or earlier. In the 2022 Scoping Plan, CARB recommends:

- VMT per capita reduced 12 percent below 2019 levels by 2030 and 22 percent below 2019 levels by 2045.
- 100 percent of Light-duty vehicle sales are zero emissions vehicles (ZEV) by 2035.
- 100 percent of medium duty/heavy duty vehicle sales are ZEV by 2040.
- 100 percent of passenger and other locomotive sales are ZEV by 2030.
- 100 percent of line haul locomotive sales are ZEV by 2035.
- All electric appliances in new residential and commercial building beginning 2026 (residential) and 2029 (commercial).
- 80 percent of residential appliance sales are electric by 2030 and 100 percent of residential appliance sales are electric by 2035.
- 80 percent of commercial appliance sales are electric by 2030 and 100 percent of commercial appliance sales are electric by 2045.

SB 743 Transportation Impacts

Senate Bill 743 (SB 743) required lead agencies to abandon the old “level of service” metric for evaluating a project’s transportation impacts, which was based solely on the amount of delay experienced by motor vehicles. In response, the Governor’s Office of Land Use and Climate Innovation (LCI), formerly the Governor’s Office of Planning and Research (OPR), developed a VMT metric that considered other factors such as reducing GHG emissions and developing multimodal transportation. A VMT-per-capita metric was adopted into CEQA Guidelines Section 15064.3 in November 2017. Given current baseline per-capita VMT levels computed by CARB in the 2030 Scoping Plan of 22.24 miles per day for light-duty vehicles and 24.61 miles per day for all vehicle types, the reductions needed to achieve the 2050 climate goal are 16.8 percent for light-duty vehicles and 14.3 percent for all vehicle types combined. Based on this analysis (as well as other factors), LCI recommended using a 15-percent reduction in per capita VMT as an appropriate threshold of significance for evaluating transportation impacts.

Executive Order B-55-18 – Carbon Neutrality

In 2018, a new Statewide goal was established to achieve carbon neutrality as soon as possible, but no later than 2045, and to maintain net negative emissions thereafter. CARB and other relevant state agencies are tasked with establishing sequestration targets and create policies/programs that would meet this goal.

Senate Bill 100 – Current Renewable Portfolio Standards

In September 2018, Senate Bill 100 (SB 100) was signed by Governor Brown to revise California’s RPS program goals, furthering California’s focus on using renewable energy and carbon-free power sources for its energy needs. SB 100 would require all California utilities to supply a specific percentage of their retail sales from renewable resources by certain target years. By December 31, 2024, 44 percent of the retail sales would need to be from renewable energy sources, by December 31, 2026 the target would be 40 percent, by December 31, 2027 the target would be 52 percent, and by December 31, 2030 the target would be 60 percent. By December 31, 2045, all California utilities would be required to supply retail electricity that is 100 percent carbon-free and sourced from eligible renewable energy resource to all California end-use customers.

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

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

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments, while being cost effective for homeowners. The California Energy Code is enforced and verified by cities during the planning and building permit process. The current energy efficiency standards (2022 Energy Code) replaced the 2019 Energy Code as of January 1, 2023. Under the 2019 standards, single-family homes are predicted to be 53 percent more efficient than homes built under the 2016 standard due to more stringent energy-efficiency standards and mandatory installation of solar photovoltaic systems. For non-residential developments, it is predicted that these buildings would use 30 percent less energy due to lightening upgrades.

Requirements for electric vehicle (EV) charging infrastructure are set forth in Title 24 of the California Code of Regulations (CCR). The CALGreen standards consist of a set of mandatory standards required for new development, as well as two more voluntary standards known as Tier 1 and Tier 2. The CalGreen 2022 standards require deployment of additional EV chargers in various building types, including multi-family residential and non-residential land uses. These standards include requirements for both EV capable parking spaces and the installation of Level 2 EV supply equipment for multi-family residential and non-residential buildings. There are also requirements for both EV readiness and installation of EV chargers, and mandatory requirements and more aggressive voluntary Tier 1 and Tier 2 provisions. Providing EV charging infrastructure that meets current CALGreen requirements would not be sufficient to power the anticipated more extensive level of EV penetration in the future that is needed to meet SB 30 climate goals.

CEC studies have identified the most aggressive electrification scenario as putting the building sector on track to reach the carbon neutrality goal by 2045. Installing new natural gas infrastructure in new buildings would interfere with this goal. To meet the State's goal, communities have been adopting "Reach" codes that prohibit natural gas connections in new and remodeled buildings. However, these reach codes have been challenged in court and have been found to be unlawful. Therefore, communities in California are struggling to limit natural gas use by new construction.

Advanced Clean Cars

The Advanced Clean Cars Program, originally adopted by CARB in 2012, was designed to bring together CARB's traditional passenger vehicle requirements to meet federal air quality standards and also support California's AB 32 goals to develop and implement programs to reduce GHG emissions back down to 1990 levels by 2020, a goal achieved in 2016 as a result of numerous emissions reduction programs.

Advanced Clean Cars II (ACC II) is phase two of the original rule and establishes a year-by-year process, starting in 2026, so all new cars and light trucks sold in California would be zero-emission vehicles by 2035, including plug-in hybrid electric vehicles. The regulation codifies the light-duty vehicle goals set out in Governor Newsom's Executive Order N-79-20. Currently, 16 percent of new light-duty vehicles sold in California are zero emissions or plug-in hybrids. By 2030, 68 percent of new vehicles sold in California would be zero emissions and 100 percent by 2035.

San Carlos 2030 General Plan (General Plan)

The General Plan includes policies to reduce exposure of the City's sensitive population to exposure of air pollution, toxic air contaminants (TACs), and GHG emissions. The following policies are applicable to the proposed project:

- Policy EM-7.1: Take appropriate action to address climate change and reduce greenhouse gas emissions.
- Policy EM-7.3: Participate in regional, State, and federal efforts to reduce greenhouse gas emissions and mitigate the impacts resulting from climate change.
- Policy EM-7.6: Support greenhouse gas (GHG) emission reduction measures and climate change resiliency strategies that are cost effective and help create an environmentally sustainable, livable, and equitable community. The cost of implementation to the City and private sector shall be considered prior to the adoption of any GHG reduction strategy.

City of San Carlos Climate Mitigation and Adaptation Plan (CMAP)

In 2021, the City adopted a new Climate Mitigation and Adaptation Plan (CMAP) to reduce GHG emissions. The CMAP aims to reduce emissions 40 percent by 2030 and 80 percent by 2050 relative to 1990 levels. The CMAP is an update to the 2009 Climate Action Plan (2009 CAP) that provides updated information, an expanded set of GHG reduction strategies, climate adaptation strategies and a planning horizon out to 2050. The following goals and strategies found in the CMAP are applicable to the proposed project:

- Goal 1: Reduce energy use
 - Strategy 1: Regional Energy Conservation and Efficiency Programs. Promote available energy efficiency and conservation opportunities, incentives, and technical assistance for businesses and residents.
- Goal 2: Transition to carbon-free energy sources
 - Strategy 4: Electrification. Transition to electricity as the primary energy source citywide.
 - Strategy 5: Building Codes. Advance electrification through local amendments to the California Building Code.
 - Strategy 7: Peninsula Clean Energy. Continue to support and promote PCE as the community's official electricity provider with a goal to provide 100 percent carbon-free renewable energy by 2025.
- Goal 4: Promote sustainable development that reduces vehicle miles traveled.
 - Strategy 17: Vehicles 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.
- Goal 7: Become a zero-waste community
 - Strategy 27: Construction and Demolition Waste. Increase the amount of waste recycled during construction and demolition of buildings.

In conjunction with existing State and local programs, the CMAP strategies provide a path to reduce the City's GHG emissions by 49 percent below 2005 levels by 2030 and by 83 percent below 2005 levels by 2050. This reduction would exceed the City's GHG reduction targets to reduce emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The CMAP also includes a consistency checklist for new development that can be used to streamline the development of individual projects.

Bay Area Air District GHG Significance Thresholds

On April 20, 2022, the Bay Area Air District or Bay Area Air Quality Management District (herein referenced as "Air District" or "BAAQMD") adopted new thresholds of significance for operational GHG emissions from land use projects for projects beginning the CEQA process. The following framework is how the Air District would determine GHG significance moving forward. Note the Air District intends that the thresholds apply to projects that begin the CEQA process after adoption of the thresholds, unless otherwise directed by the lead agency. The new thresholds of significance are:

- A. Projects must include, at a minimum, the following project design elements:
 - a. Buildings
 - i. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).¹⁵

¹⁵ It should be noted that this project design element is not applicable as the Energy Policy and Conservation Act of 1975 expressly preempts State and local regulations concerning the energy use of natural gas appliances; refer to *California Restaurant Association v. City of Berkeley*, 65 F.4th 1045 (9th Cir. 2023).

- ii. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
- b. Transportation
 - i. 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:
 - 1. Residential Projects: 15 percent below the existing VMT per capita
 - 2. Office Projects: 15 percent below the existing VMT per employee
 - 3. Retail Projects: no net increase in existing VMT
 - ii. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
- B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Any new land use project would have to include either section A or B from the above list, not both, to be considered in compliance with the Air District's GHG thresholds of significance.

Environmental Setting

GHGs, gases that trap heat in the atmosphere, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO₂) and water vapor but there are also several others, most importantly methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO₂, CH₄, and N₂O are byproducts of fossil fuel combustion.
- N₂O is associated with agricultural operations such as fertilization of crops.
- CH₄ is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semi-conductor manufacturing.

Each GHG has its own potency and effect upon the earth's energy balance. This is expressed in terms of a global warming potential (GWP), with CO₂ being assigned a value of 1 and sulfur hexafluoride being several orders of magnitude stronger. In GHG emission inventories, the weight of each gas is multiplied by its GWP and is measured in units of CO₂ equivalents (CO₂e).

An expanding body of scientific research supports the theory that global climate change is currently affecting changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it would increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise would increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more

extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

Federal and Statewide GHG Emissions

The United States Environmental Protection Agency (EPA) reported that in 2022, total gross nationwide GHG emissions were 6,343.2 million metric tons (MMT) CO₂e. These emissions were lower than peak levels of 7,416 MMT that were emitted in 2007. CARB updates the Statewide GHG emission inventory on an annual basis where the latest inventory includes 2000 through 2022 emissions. In 2022, GHG emissions from Statewide emitting activities were 371.1 MMT CO₂e. The 2022 emissions have decreased by 24 percent since peak levels in 2004, are 9.3 MMT CO₂e lower than 2021 emissions levels, and almost 60 MMT CO₂e below the State's 2020 GHG limit of 431 MMT CO₂e. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 MT CO₂e per person to 9.5 MT CO₂e per person in 2022.

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

Less Than Significant Impact: GHG emissions associated with development of the proposed project would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, on-site smog testing and detailing activities, and solid waste disposal. Emissions for the proposed project are discussed below and were analyzed using the methodology recommended in the Air District's CEQA Air Quality Guidelines (Air District CEQA Guidelines).

CalEEMod Modeling

The California Emissions Estimator Model (CalEEMod) Version 2022 was used to predict GHG emissions from operation of the site assuming full build-out of the proposed project. The project land use types and size and other project-specific information were input to the model, as described above within the construction and operational period emissions. CalEEMod outputs are included in Attachment 1 of Appendix A.

Construction GHG Emissions

GHG emissions associated with construction were computed at 276 MT of CO₂e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor the Air District have an adopted threshold of significance for construction-related GHG emissions, though LCI recommends quantifying emissions and disclosing that GHG emissions would occur during construction, even in cases where the Air District does not. The Air District also encourages the incorporation of best management practices (BMPs) to reduce GHG emissions during construction where feasible and applicable.

Operational GHG Emissions

The CalEEMod model was used to estimate daily emissions associated with operation of the fully developed site under the proposed project. For informational purposes, annual GHG emissions resulting from operation of the proposed project in Table 9, Annual Project GHG Emissions (CO₂e) in Metric Tons, are predicted to be 151 MT of CO₂e in 2028.

Table 9.
Annual Project GHG Emissions (CO₂e) in Metric Tons

Source Category	Existing Use in 2025	Proposed Project in 2028
Mobile	101	36
Area	<1	1
Energy Consumption	80	4
Water Usage	5	3
Solid Waste Generation	13	58
Refrigerants ¹	1	0
Stationary		3
Total (MT CO ₂ e/year)	200	151
Net Total (MT CO ₂ e/year)		(50)

Source: 930 Commercial Street Air Quality & Greenhouse Gas Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated September 26, 2025, revised October 7, 2025; refer to Appendix A, AQ/GHG/Energy Study.

Notes: ¹CalEEMod does not calculate emissions that occur from servicing automobile AC systems for the project's land use type. These emissions have been set to zero instead.

The project would be required to meet the minimum project design elements recommended by the Air District (Threshold A) or be consistent with a local GHG reduction strategy (Threshold B). As such, Threshold B is being applied to the proposed project as the City has a qualified CMAP that includes a consistency checklist. The proposed project would be consistent with the City of San Carlos' CMAP Checklist, and therefore meets the requirement of Threshold B. The CMAP Checklist is included in Attachment 4 of Appendix A. As such, impacts would be less than significant in this regard.

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

Less Than Significant Impact: The proposed project would not conflict or otherwise interfere with the Statewide GHG reduction measures identified in CARB's Scoping Plan. The City has a CMAP and enforces its Building Code, which aims to reduce GHG emissions. Therefore, if individual projects conform to the City's Building Code, the projects would conform with the CAP and would not conflict with local plans, policies, or regulations applicable to GHG emissions. The proposed projects would be constructed in conformance with at minimum the 2022 CalGreen and the Title 24 Building Codes, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficiency standards. Compliance with these standards ensures compliance with federal and State plans, policies, and regulations applicable to GHG emissions. As such, impacts would be less than significant in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to GHG emissions; therefore, no mitigation measures are required.

3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that 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?	☐	☐	☐	☒
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?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

The information presented in this analysis is primarily based on the Phase I Environmental Site Assessment Report, Commercial Street Industrial, 930-940 Commercial Street, San Carlos, California 94070 (Phase I ESA), prepared by Nova Group, GBC, dated August 13, 2020; refer to Appendix E, Phase I ESA.

Regulatory Setting

Regulations at the federal, State, and local levels applicable to the proposed project related to hazards and hazardous materials include:

- 40 Code of Federal Regulations, Part 61, Section 61.154
- California Code of Regulations Titles 8, 22, 26, and 49
- California Government Code Section 65962.5
- Health and Safety Code Chapter 6.95

- Bay Area Air Quality Management District (BAAQMD) Regulation 11-2
- 2045 General Plan Reset Environmental Impact Report (General Plan EIR)
- San Carlos 2030 General Plan (General Plan)

Environmental Setting

Existing Conditions

The project site is currently occupied by two (2) single-story industrial buildings, two (2) asphalt parking lots, and ornamental landscaping. The two (2) industrial buildings include an approximately 19-foot-tall, 19,068-square-foot concrete building and an approximately 20-foot-tall, 14,639-square-foot metal building.

Schools Within One-Quarter Mile of the Project Site

As depicted in General Plan Figure 8-8, Public Services, the project site is not located within one-quarter mile of a school. The nearest school to the project site is Arroyo Elementary School, located approximately 0.51 miles to the southwest of the project site at 1710 Arroyo Avenue.

Cortese List

The project site is not listed pursuant to Government Code Section 65962.5.¹⁶

Public Airports or Public Use Airports Within Two Miles of the Project Site

The San Carlos Airport is a small county-owned and operated airport located approximately 0.23 miles north of the project site. As depicted in the Final Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport (ALUCP) Exhibit 4-3, San Carlos Airport Safety Zones, the project site is located in Safety Zone 6, which is the traffic pattern zone and is not within a primary flight path for the San Carlos Airport.¹⁷

Emergency Response Plan/Emergency Evacuation Plan

According to the General Plan EIR, the San Carlos Emergency Operations Plan (EOP) provides the framework, concepts, and policies of the City of San Carlos' (City) emergency procedures and operations to ensure effective management and coordination of the City's response to emergencies and disasters. According to the General Plan, the City has operated the Emergency Operations Center (EOC) since 1987, which functions as the central command post in the event of a disaster. The EOC is located at 600 Elm Street (i.e., City Hall).

Wildfire Risks

According to the California Department of Forestry and Fire Protection (CAL FIRE) and General Plan EIR, no State Responsibility Areas (SRAs) are located within the City.¹⁸ However, the City's foothill neighborhoods west of Alameda de las Pulgas are designated as Very High Fire Hazard Severity Zones (FHSZ) within Local Responsibility Areas (LRAs).¹⁹ Within LRAs, fire protection services are generally provided by city fire departments, fire protection districts, counties, or by CAL FIRE under contract to a local government. The Redwood City and San Carlos Fire Departments

¹⁶ California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed October 12, 2025.

¹⁷ City/County Association of Governments of San Mateo County, Final Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport, https://ccag.ca.gov/wp-content/uploads/2015/11/SQL_FinalALUCP_Oct15_read.pdf, accessed October 12, 2025.

¹⁸ California Department of Forestry and Fire Protection, State Responsibility Area Fire Hazard Severity Zones, San Mateo County, April 1, 2024, <https://calfire.app.box.com/s/viyyvmwaeaciuhwfb2bdxqdok3zo0ke/file/1483769665386>, accessed September 30, 2025.

¹⁹ California Department of Forestry and Fire Protection, Local Responsibility Area Fire Hazard Severity Zones, City of San Carlos – San Mateo County, February 24, 2025, <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785863154775>, accessed September 30, 2025.

provide fire protection services within the cities of Redwood City and San Carlos. According to CAL FIRE and General Plan EIR Figure 4.18-1, Very High Fire Hazard Severity Zones, the project site is not classified as being located within a moderate, high, or very high FHSZ in LRA.²⁰

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

Less Than Significant Impact:

Construction

Project construction could expose construction workers and the public to temporary hazards related to the routine transport, use, and maintenance of standard construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). However, these activities would be short-term, and the materials used would not be in such quantities, or stored in such a manner, as to pose a significant safety hazard. All project construction activities would be required to demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

Operation

The proposed project would include the construction of a new 48,370-square-foot commercial automobile and vehicle repair facility. As such, long-term operation of the project may involve the routine transport, use, or disposal of hazardous materials.

The proposed project would be subject to compliance with existing regulations, standards, and guidelines established by the United States Environmental Protection Agency (EPA), State, and the County of San Mateo related to the transport, use, and disposal of hazardous materials. The project is subject to compliance with the existing hazardous materials regulations, which are codified in California Code of Regulations Titles 8, 22, and 26, and their enabling legislations set forth in Health and Safety Code Chapter 6.95 as well as California Code of Regulations Title 49. Both the Federal and State governments require any business, where the transport, use, or disposal of a regulated substance exceeds the specified threshold quantity, to register with the County and prepare a Risk Management Plan. The Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. Prior to issuance of building permits, the proposed project would be required to submit their plans to the Certified Unified Program Agency (CUPA) (San Mateo County Health Services), which would make these plans available to emergency response personnel.

While the risk of exposure to hazardous materials cannot be eliminated, best management practices (BMPs) can be implemented to reduce risk to acceptable levels. These include, but are not limited to, minimizing the use of pesticides and quick-release fertilizers, designating repair/maintenance areas indoors to prevent stormwater run-on and runoff (i.e., providing secondary containment), and installing impermeable surfaces in fueling areas, among others. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Impacts regarding the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

²⁰ Ibid.

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

Less Than Significant Impact With Mitigation Incorporated:

Construction

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid or minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by federal, State, and local, State laws.

Based on the Phase I ESA, no known hazardous materials/substances releases have occurred to the soil, soil gas, or groundwater at the project site. As such, grading activities are not anticipated to encounter hazardous materials/substances during excavation/grading activities.

Construction activities would include demolition of the existing on-site buildings. According to the Phase I ESA, the existing buildings may be associated with hazardous materials (e.g., asbestos-containing materials [ACMs]) due to the age of the buildings (constructed between 1950 to 1978). As such, MM-HAZ-1 would require contractors to submit a notice to BAAQMD prior to demolition activities, follow proper removal processes for ACMs (e.g., wetting of exposed ACMs to limit dust, utilization of a proper ventilation system co-capture particulate asbestos materials, encasing ACMs in proper wrappings), and follow proper waste handling and disposal practices (e.g., ACMS are placed in proper containers and/or wrappings, adequate wetting of ACMs during transport, proper labeling of containers and/or wrappings of ACMs) in accordance with BAAQMD Regulation 11-2, Asbestos Demolition, Renovation, and Manufacturing Rule, and California Code of Regulations Title 8, Section 1529, Asbestos. ACMs would also require disposal at a waste disposal facility operated in accordance with the provisions of 40 Code of Federal Regulations, Part 61, Section 61.154, Standard for active waste disposal sites, or an EPA-approved site that converts regulated-ACMs and asbestos-containing waste materials into non-asbestos (asbestos-free) material in accordance with the provisions of 40 Code of Federal Regulations, Part 61, Section 61.155, Standard for operations that convert asbestos-containing waste material into non-asbestos (asbestos-free) material.

The removal of asbestos would also require the supervision of a certified asbestos consultant or site surveillance technician during the removal process. With implementation of MM-HAZ-1 and compliance with federal and State regulations pertaining to ACM removal during building demolition activities and transport, impacts in this regard would be reduced to less than significant levels.

Operation

Refer to Response 3.9(a) for a description of impacts related to proposed operations at the project site. Upon adherence to existing regulations related to chemical safety, impacts pertaining to the potential for accidental conditions during project operations would be less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

No Impact: As depicted in General Plan Figure 8-8, the project site is not located within one-quarter mile of a school. The nearest school to the project site is Arroyo Elementary School, located approximately 0.51 miles to the southwest of the project site at 1710 Arroyo Avenue. Therefore, the project would not emit hazardous emissions or handle

hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur in this regard.

- d) *Would the project be located on a site that 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?***

No Impact: The project site is not listed pursuant to Government Code Section 65962.5.²¹ As such, no impacts would occur in this regard.

- 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 is a small county airport located approximately 0.23 miles north of the project site. As depicted in ALUCP Exhibit 4-3, the project site is located in Safety Zone 6, which is the traffic pattern zone and is not within a primary flight path for the San Carlos Airport. No limit is placed on the intensity for new non-residential uses within Safety Zone 6. Industrial developments are identified as being compatible uses in Safety Zone 6. The ALUCP establishes that projects in this zone have a maximum allowable height of 155 feet above mean sea level without further review or approvals. The proposed facility would have a maximum height of 42 feet and thus would be within the maximum allowable height. The project would not include elements dangerous to aircraft such as blinking lights, smoke columns, or features which would attract birds. 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. As such, impacts would be less than significant.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

Less Than Significant Impact With Mitigation Incorporated: According to the General Plan EIR, the EOP provides the framework, concepts, and policies of the City's emergency procedures and operations to ensure effective management and coordination of the City's response to emergencies and disasters. According to the General Plan, the City has operated the EOC since 1987, which functions as the central command post in the event of a disaster. The EOC is located at 600 Elm Street (i.e., City Hall).

As indicated in Section 3.17, Transportation, the project does not include changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to the area roadways. Further, should partial or full lane closures be required during construction activities, implementation of a Traffic Management Plan (TMP), as part of MM-TRA-1, would minimize congestion and ensure safe travel, including emergency access in the project vicinity. As a small-scale industrial development, project implementation would not physically interfere with an adopted emergency response plan or emergency evacuation plan. With implementation of MM-TRA-1, impacts would be reduced to less than significant levels.

²¹ California Environmental Protection Agency, Cortese List Data Resources, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed October 12, 2025.

- g) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

No Impact: According to CAL FIRE and General Plan EIR Figure 4.18-1, the project site is not located within or near an SRA nor is the project site classified as very high FHSZ. As such, project implementation would have no impact in this regard.

MITIGATION MEASURES

MM-HAZ-1 Handling of Asbestos-Containing Materials

Prior to any work that would disturb asbestos-containing materials (ACMs) or create an airborne asbestos hazard (i.e., demolition of the existing buildings), the project applicant shall require that contractors submit a notice to the Bay Area Air Quality Management District (BAAQMD), prior to demolition activities, to follow proper removal processes for ACMs (e.g., wetting of exposed ACMs to limit dust, utilization of a proper ventilation system co-capture particulate asbestos materials, encasing ACMs in proper wrappings), and follow proper waste handling and disposal practices (e.g., ACMs are placed in proper containers and/or wrappings, adequate wetting of ACMs during transport, proper labeling of containers and/or wrappings of ACMs) in accordance with BAAQMD Regulation 11-2, Asbestos Demolition, Renovation, and Manufacturing Rule, and California Code of Regulations Title 8, Section 1529, Asbestos.

ACMs shall also require disposal at a waste disposal facility operated in accordance with the provisions of 40 Code of Federal Regulations, Part 61, Section 61.154, Standard for active waste disposal sites, or a United States Environmental Protection Agency-approved site that converts regulated-ACMs and asbestos-containing waste materials into non-asbestos (asbestos-free) material in accordance with the provisions of 40 Code of Federal Regulations, Part 61, Section 61.155, Standard for operations that convert asbestos-containing waste material into non-asbestos (asbestos-free) material. The removal of asbestos shall also require the supervision of a certified asbestos consultant or site surveillance technician, retained by the project applicant, during the removal process.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground 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?	☐	☐	☒	☐
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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Regulatory Setting

Regulations at the federal, State, and local levels applicable to the proposed project related to hydrology and water quality include:

- Federal Emergency Management Agency's (FEMA) National Flood Insurance Program
- 2014 Sustainable Groundwater Management Act
- National Pollutant Discharge Elimination System (NPDES) General Permit For Stormwater Discharges Associated With Construction And Land Disturbance Activities (General Permit) Order WQ 2022-0057- DWQ (General Construction Permit)
- NPDES Phase I Municipal Stormwater (MS4) Permits

- San Carlos Municipal Code (Municipal Code)
- 2045 General Plan Reset Environmental Impact Report (General Plan EIR)

Environmental Setting

The proposed project is located on a 1.69-acre site. The project site is currently occupied by two (2) single-story industrial buildings, two (2) asphalt parking lots, and ornamental landscaping. The project site is not currently used for groundwater extraction or groundwater recharge purposes. According to FEMA's National Flood Hazard Layer Viewer, the project site is located within an existing FEMA floodway (100-year special flood hazard area [SFHA]) which prohibits any increase in water surface elevation.²²

a) ***Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

Less Than Significant Impact: The project site is located within the jurisdiction of the San Francisco Regional Water Quality Control Board (RWQCB).

Construction

The proposed project may result in water quality impacts during short-term construction activities. The grading and excavation required for project implementation would result in exposed soils that may be subject to wind and water erosion. Potential pollutants associated with these activities could damage downstream waterbodies. The proposed project is located on a 1.69-acre site. Dischargers whose projects disturb one or more acres of soil are required to obtain coverage under the State Water Resources Control Board's (SWRCB) General Construction Permit.²³ Prior to construction activities, the General Construction Permit requires the project applicant to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project. Implementation of the BMPs would ensure runoff and discharges during the project's construction phase would not violate any water quality standards. Upon completion of the project, the applicant is required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed. Accordingly, compliance with the Construction General Permit and Municipal Code would reduce short-term construction-related impacts to water quality to less than significant.

Operation

The proposed project would be regulated under the NPDES MS4 Permits issued by the San Francisco RWQCB for the San Francisco Bay Region (Order No. 99-059, as amended by Order Nos. R2-2003-0023, R2-2004-0060, R2-2004-0062, R2-2007-0027, R2-2009-0074, and NPDES Permit No. CAS0029921).²⁴ Since 1990, operators of MS4s are required to develop a stormwater management program designed to prevent harmful pollutants from impacting water resources via stormwater runoff. The proposed project is a 1.69-acre redevelopment project which would propose a 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements, which means that it would be considered a Regulated Project under Criteria C.3.b.ii of the MS4 Permit. Regulated Projects are required to implement low impact development (LID) source control, site design, and stormwater treatment on-site or at a joint stormwater treatment facility. The proposed project would include LID bioretention planters within the project site which would collect stormwater runoff, allow infiltration into the soil, and discharge remaining runoff into curb drains along the adjacent sidewalks. The proposed project would also require conformance with Municipal Code

²² Federal Emergency Management Agency, National Flood Hazard Layer Viewer, <https://www.fema.gov/flood-maps/national-flood-hazard-layer>, accessed October 13, 2025.

²³ California State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit For Stormwater Discharges Associated With Construction And Land Disturbances Activities (General Permit), Order SQ 2022-0057-DWQ NPDES No. CAS000002, https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html, accessed October 13, 2025.

²⁴ California Regional Water Quality Control Board San Francisco Bay Region, Municipal Regional Stormwater NPDES Permit, October 14, 2009.

Chapter 13.14, Stormwater Management and Discharge Control, requirements in order to reduce long-term water quality impacts to less than significant levels. Overall, implementation of the aforementioned LID source controls and compliance with the Municipal Code would ensure the project does not violate any water quality standards or waste discharge requirements. Therefore, long-term water quality impacts would be less than significant.

b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less Than Significant Impact: As depicted in Figure 2-10D, Groundwater Basins: East and South Bay, of the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan), the project site is located within the Santa Clara Valley, San Mateo Plain groundwater basin. The project site is currently occupied by two (2) single-story industrial buildings, two asphalt parking lots, and ornamental landscaping. The project site is not currently used for groundwater extraction or groundwater recharge purposes. Furthermore, development of the project would not result in an increase in impervious surfaces compared to existing conditions. Rather, the proposed project would decrease impervious areas through the addition of additional ornamental landscaping. Therefore, the proposed project is not expected to substantially interfere with groundwater recharge that could impede the sustainable groundwater management of the Santa Clara Valley, San Mateo Plain groundwater basin. A less than significant impact would occur in this regard

c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

i) *Result in substantial erosion or siltation on- or off-site?*

Less Than Significant Impact:

Construction

The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river. As discussed in Response 3.10(a), the project would be required to comply with the General Construction Permit requirements, which would reduce water quality impacts including erosion during construction. As such, impacts during construction activities would be less than significant.

Operation

During project operations, the site would not include large areas of exposed soils that would be subject to runoff. The proposed project would result in a decrease of impervious surfaces and an increase of pervious surfaces through the addition of ornamental landscaping, when compared to existing conditions. As such, any unpaved areas would be improved with landscaping, which would have an overall decrease in the runoff potential, and indirectly reduce the off-site potential for erosion/siltation during project operation, compared to existing conditions. Further, given the nature of the proposed use, the urbanized project setting, and the substantial increase in landscaped areas and on-site biofiltration, long-term operation of the project would not have the potential to result in substantial erosion or siltation. The proposed project would also be in conformance with Municipal Code Chapter 13.14 requirements in order to reduce long-term water quality impacts to less than significant levels. Thus, impacts would be less than significant in this regard.

ii) *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*

Less Than Significant Impact: As detailed in Response 3.10(b), the project would decrease impervious surface areas on-site when compared to existing conditions. Given the decrease of impervious surface areas, the project is not

anticipated to result in flooding on- or off-site. Furthermore, the proposed project would increase landscaped areas on-site, including through the addition of bioretention planters, which would capture, store, and treat stormwater on-site. As such, stormwater would not be directed to the City's existing stormwater facilities along the Commercial Street right-of-way. Impacts would be less than significant in this regard.

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: Refer to Responses 3.10(c)(i) and 3.10(c)(ii). The proposed project would result in a decrease of impervious surfaces on-site and an increase of landscaped areas on-site, when compared to existing conditions. As such, any unpaved areas would be improved with landscaping, which would have an overall decrease in the potential for runoff water during project operation, compared to existing conditions. Further, the proposed condition would result in increased biofiltration of stormwater prior to discharge, compared to the existing condition. As such, the project would not result in additional sources of polluted runoff, compared to the existing condition. Impacts would be less than significant in this regard.

iv) *Impede or redirect flood flows?*

Less Than Significant Impact: Refer to Responses 3.10(c)(2) and 3.10(d).

d) *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

Less Than Significant Impact:

Flood Hazard

According to FEMA's National Flood Hazard Layer Viewer, the project site is located within an existing FEMA floodway (100-year SFHA) which prohibits any increase in water surface elevation.²⁵ Specifically, the project site is classified as Zone AE, which is subject to inundation by a 1-percent-annual-chance-flood event. In the event of a flood, the proposed project could result in a release of pollutants, including suspended solids/sediments, nutrients, heavy metals, pathogens, oil and grease, toxic organic compounds, and trash/debris. Nevertheless, as the project would disturb more than one acre of land, the proposed project would be required to prepare a SWPPP. Specifically, prior to any activities that may result in pollutants entering an MS4 sewer system, the project would be required to prepare a SWPPP for approval by the City Engineer prior to construction. The SWPPP would identify BMPs to be implemented during construction of the project in order to prevent erosion, minimize siltation impacts, and protect water quality. Furthermore, as the project site is located within a SFHA, the proposed project would be required to comply with the provisions of Municipal Code Chapter 15.56, Flood Damage Prevention, which is intended to promote the public health, safety and general welfare, and minimize public and private losses due to flood conditions in specific areas. Adherence to the Municipal Code and BMPs in the SWPPP would reduce, prevent, or minimize the potential for release of pollutants in the event of a flood. With compliance with the Municipal Code and SWPPP and its associated BMPs, the proposed project would result in less than significant impacts involving flood hazards.

²⁵ Federal Emergency Management Agency, National Flood Hazard Layer Viewer, <https://www.fema.gov/flood-maps/national-flood-hazard-layer>, accessed October 13, 2025.

Tsunami

The project site is located approximately 0.39 miles southwest of the San Francisco Bay. However, according to the General Plan EIR, the City, including the project site is not within the tsunami hazard zone for the Bay Area. Thus, the site is not anticipated to be subject to flooding from a tsunami.

Seiche

As stated above, the project site is located approximately 0.39 miles southwest of the San Francisco Bay. However, the project site is not within the tsunami hazard zone for the Bay Area. Thus, the site is not anticipated to be inundated by a seiche.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact: The Basin Plan establishes water quality standards for ground surface waters within the San Francisco Bay Region, including the City, and is the basis for the San Francisco RWQCB's regulatory programs.²⁶

The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans (GSPs) or prepare an alternative to a groundwater sustainability plan. As depicted in Basin Plan Figure 2-10D, the project site is located within the Santa Clara Valley, San Mateo Plain groundwater basin, which is designated as a Very Low priority basin.²⁷ Therefore, there is no groundwater sustainability plan established for the Santa Clara Valley, San Mateo Plain groundwater basin. Implementation of the proposed project would not conflict with the Basin Plan for the Santa Clara Valley, San Mateo Plain groundwater basin and as indicated in Response 3.10(b), the project would not substantially deplete groundwater supplies or interfere with groundwater recharge. As a result, the proposed project is not anticipated to conflict with or obstruct with the Santa Clara Valley, San Mateo Plain groundwater basin and Basin Plan. No impacts would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to hydrology and water quality; therefore, no mitigation measures are required.

²⁶ San Francisco Regional Water Quality Control Board, Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin, https://www.waterboards.ca.gov/sanfranciscobay/basin_planning.html, accessed October 13, 2025.

²⁷ California Department of Water Resources, SGMA Basin Prioritization Dashboard, <https://gis.water.ca.gov/app/bp-dashboard/final/>, accessed October 13, 2025.

3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

Regulatory Setting

Regulations at the local level applicable to the proposed project related to land use and planning include:

- San Carlos 2030 General Plan (General Plan)
- San Carlos Municipal Code Title 18 (Zoning Code)
- East Side Innovation District Vision Plan (Vision Plan)

Environmental Setting

According to General Plan Figure 3-3, Major Developed Areas in San Carlos, the project site is located within the Vision Plan area. The Vision Plan area consists of 150 acres of commercially zoned areas and is generally bounded by Highway 101 to the east, Brittan Avenue to the south, Old Country Road to the west, and Holly Street to the north. Approximately 1.7 million square feet of net new development has been proposed (i.e., under review, approved, or constructed) throughout the Vision Plan area.

According to the City of San Carlos General Plan Map, the project site is designated as Planned Industrial, which is intended to accommodate research and development, biotech, light industrial, flex warehousing, and related uses. According to the City of San Carlos Interactive Zoning Map, the site is zoned as Heavy Industrial (IH), which is intended to accommodate a broad range of industrial uses, including industrial buildings and complexes, flex space, warehouses, manufacturing and assembly, and other uses that require large, warehouse-style buildings with flexible floor plans. Small-scale retail and ancillary office uses are also permitted.

a) *Would the project physically divide an established community?*

No Impact: Factors that could physically divide an established community include the construction of major infrastructure such as highways, roadways, storm channels, and utility transmission lines. The closure of highways, roadways, and bridges could also physically divide an established community. These types of projects may create physical barriers that disrupt connectivity between different parts of a community, potentially separating residents from services, amenities, or other neighborhoods.

The project site is occupied by two (2) single-story industrial buildings, two (2) asphalt parking lots, and ornamental landscaping, which would be demolished in order to construct a new one (1) story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements. The proposed project does not involve the construction of any infrastructure that could physically divide an established community. Specifically, the proposed project would not introduce new highways, roadways, storm channels, bridges, or utility transmission lines that could physically divide an established community, nor would the project result in the removal of such

infrastructure. Rather, the project would promote neighborhood connectivity through a proposed 8-foot-wide public access easement along the northern site boundary, which would be dedicated for future use as an 8-foot-wide pedestrian pathway. The proposed sidewalk would connect to the future 8-foot-wide pedestrian pathway, which would become a segment of the future Discovery Path, anticipated to be up to 44 feet in width as part of the Vision Plan. The future discovery path would eventually connect with the existing pedestrian network, including the Industrial Road pedestrian facilities. Furthermore, the future discovery path would eventually connect to the proposed Commercial Street pedestrian facilities associated with the approved Alexandria Center for Life Science Project (State Clearinghouse Number 2021060668), anticipated as part of the Vision Plan. As such, no impact would occur in this regard.

b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less Than Significant Impact: The following evaluates the project's consistency with applicable land use plan, policies, and regulations, including the General Plan, Vision Plan, and Zoning Code.

General Plan Consistency

The project site is designated as Planned Industrial. Table 10, General Plan Land Use Consistency Analysis, analyzes the project's consistency with applicable goals and policies in the General Plan Land Use Element

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
Goal LU-1: Ensure a sustainable land use pattern.	
Policy LU-1.12: Promote the development of publicly accessible urban trails throughout the city to provide access to the natural environment and facilitate non-motorized transportation options.	Consistent: Primary pedestrian access to the facility's main entrance, located in the northeastern corner of the site, would be provided via the proposed sidewalk, connecting to the proposed parking lot. Secondary pedestrian access would be provided via a second entrance along the facility's western elevation. It should be noted that a proposed 8-foot-wide public access easement along the northern site boundary would be dedicated for future use as an 8-foot-wide pedestrian pathway. The proposed sidewalk would connect to the future 8-foot-wide pedestrian pathway, which would become a segment of the future discovery path, anticipated to be up to 44-feet-in-width as part of the Vision Plan. The future discovery path would eventually connect with the existing pedestrian network, including the Industrial Road pedestrian facilities. Furthermore, the future discovery path would eventually connect to the proposed Commercial Street pedestrian facilities associated with the approved Alexandria Center for Life Science Project (State Clearinghouse Number 2021060668), anticipated as part of the Vision Plan. As such, the proposed project would comply with this policy.
Policy LU-1.14: Support creative, innovative and flexible approaches to parking standards and the provision of parking facilities	Consistent: Because the project site is located within one-half mile of the Caltrain San Carlos Station, pursuant to California Government Code Section 65863.2 (Assembly Bill 2097 [2022]), the project is exempt from the City of San Carlos minimum parking requirements (pursuant to San

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
	Carlos Municipal Code [Municipal Code] Section 18.20.040, Required parking spaces). Nonetheless, the project would provide a total of six (6) parking spaces, consisting of two (2) standard spaces, two (2) electric vehicle (EV) spaces, one (1) Americans with Disabilities Act (ADA) EV space, and one (1) ADA van space. On-site parking, with underlying permeable pavers, would be located along the eastern boundary of the project site and would be accessed via the northern-most driveway located in the northeastern corner of the site. Four (4) short-term bicycle parking spaces would be provided near the northeastern corner of the site. As such, the proposed project would comply 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.	Consistent: As analyzed in Section 3.17, Transportation, VMT impacts would be less than significant. As such, the proposed project would comply with this policy.
Goal LU-3: Promote connectivity and provide retail and services within walking distance of homes and employment areas.	
Policy LU-3.10: Encourage the creation of safe, walkable environments that include elements such as wide, smooth sidewalks, good lighting, safe crosswalks, clear signage, curb bulb-outs, curb cuts, street furniture and trees and traffic-calming measures which allow people of all ages and abilities to exercise and safely access public transportation, community centers and schools and goods and services..	Consistent: Refer to Response to Policy LU-1.12. Additionally, a combination of building-mounted, pole-mounted, bollard-mounted, and pathway lighting is proposed on-site, including nighttime parking lot, vehicle access, security, and landscaping lighting. All light fixtures would be required to comply with the City's lighting standards identified in Municipal Code Sections 18.15.070, Lighting and illumination, 18.29.050, Scope of design review, and 18.29.060, Design review criteria, which are intended to preserve the City's nighttime character and reduce the potential for excessive glare or light trespass. The project frontage along Commercial Street would include building signage along the main driveway to the proposed surface parking lot. New curbs cuts would be included as part of the proposed project. Specifically, curb cuts would be located at the project's ingress and egress points (i.e., the two [2] new driveways located along Commercial Street). The proposed project would involve the removal of seven (7) existing on-site trees. Ornamental landscaping would be planted throughout the project site, particularly on the ground level along the northern and eastern site boundaries. Planting materials would feature drought-tolerant plants, including a mix of trees, shrubs, and groundcover, some of which would be contained in bioretention planters. On-site tree varieties would include 36-inch box species (strawberry tree multi-trunk, swan hill fruitless olive, and fem pine) and 24-inch box species (Dr. Hurd common manzanita). Shrub varieties would include

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
	Howard McMinn manzanita, California coffeeberry, and white sage. Groundcover and perennial landscaping may include giant hummingbird's mint, purple giant hyssop, blonde ambition blue grama, Karl Foerster feather reed grass, California gray rush, mat rush, deer grass, trailing myoporum, and Margarita BOP penstemon. In total, twenty-six (26) new trees would be planted on-site, and approximately 11,775 square feet of the project site would be landscaped. The proposed project would involve the removal of one (1) existing street tree along Commercial Street. Off-site ornamental landscaping would be planted along the eastern boundary of the site. Planting materials would feature drought-tolerant plants, including a mix of trees and groundcover, consisting of silver linden (24-inch box species) and deer grass, respectively. In total, six (6) new street trees would be planted along Commercial Street right-of-way, and approximately 725 square feet of off-site areas would be landscaped. As such, the proposed project would comply with this policy.
Policy LU-3.14: Require sidewalks, or deferred improvement agreements, for all new and substantially renovated commercial properties on the East Side.	Consistent: Refer to Response to Policy LU-1.12.
Goal LU-5: Support and maintain land uses that contribute to a vibrant and resilient local economy and support the fiscal well being of the City.	
Policy LU-5.1: Maintain a diversity of land uses while achieving the desired transportation level of service.	Consistent: Refer to Response to Policy LU-1.15. The proposed project includes the removal of the two (2) existing single-story industrial buildings and asphalt parking lots, in order to construct a new one-story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements. The facility would be designed to service and maintain a fleet of corporate gasoline-powered, light-duty vehicles, featuring a variety of amenities and spaces geared towards the industrial use. As such, the proposed project would maintain a diversity of land uses by preserving and enhancing the existing industrial use areas of the City; thus, supporting the City's fiscal well-being by generating employment opportunities and contributing to the City's local tax revenues. As such, the proposed project would comply with this policy.
Policy LU-5.3: Support and encourage businesses and land uses that contribute to the City's financial viability.	Consistent: Refer to Response to Policy LU-5.1.
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.	Consistent: As analyzed in Sections 3.15, Public Services, and 3.19, Utilities and Service Systems, the proposed project would pay the corresponding development impact and utility connection fees to public services and utility

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
	providers. As such, the proposed project would comply with this policy.
Goal LU-6: Strengthen the economic vitality of the East Side of the city by encouraging a diversity of commercial uses while protecting and preserving existing industrial uses.	
Policy LU-6.1: Support commercial/industrial activity and businesses on the East Side.	Consistent: Refer to Response to Policy LU-5.1.
Policy LU-6.2: 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.	Consistent: Refer to Response to Policy LU-5.1.
Policy LU-6.3: Support the expansion of key growth industries while maintaining the overall diversity of land uses within East Side employment areas.	Consistent: Refer to Response to Policy LU-5.1.
Policy LU-6.6: Encourage new development on the East Side to feature high quality architecture that reinforces the character of the area.	Consistent: The proposed facility would have a maximum height of 42 feet. The building's architecture would consist of wide, durable, flat vertical metal panels with projected fins and glazed storefront-style windows with framed metal. The facility's exterior would include a combination of colors, including white, light gray, and dark gray. Overall, the proposed project's architecture would provide a modern countermeasure to older existing industrial buildings in the vicinity and complement the structures and recently entitled projects that have been built and/or approved over the last several years. As such, the proposed project would comply with this policy.
Policy LU-6.7: Maintain and strengthen industrial uses in the inner core of the East Side area.	Consistent: Refer to Response to Policy LU-5.1.
Goal LU-8: Ensure excellence in all development design.	
Policy LU-8.1: Require all development to feature high quality design that enhances the visual character of San Carlos.	Consistent: Refer to Response to Policy LU-6.6.
Policy LU-8.2: Ensure that new development is sensitive to the character of adjacent structures and the immediate neighborhood.	Consistent: Refer to Response to Policy LU-6.6. Additionally, the proposed project would also include a 46-foot, 5-inch front setback; a 61-foot, 10-inch interior side (east) setback; a 6-foot, 2-inch interior side (west) setback; and a 9-foot, 5-inch rear setback. As such, the proposed project would comply with this policy.
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. Distinctiveness and variety in architectural design.	Consistent: Refer to Responses to Policies LU-1.12, LU-3.10, and LU-6.6.

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
Policy LU-8.4: Promote pedestrian-scaled design through site planning, building design, finish details and landscaping for all types of development by requiring height and locational transitions between buildings of varied levels that are sensitive to the interrelationships of surrounding uses and structures, especially residential.	Consistent: Refer to Responses to Policies LU-1.12, LU-3.10, and LU-6.6.
Policy LU-8.5: Optimize architectural quality by encouraging the use of quality materials, particularly as accents and authentic detailing, such as balconies and window trims.	Consistent: Refer to Response to Policy LU-6.6.
Policy LU-8.8: Encourage design of convenient pedestrian walkways with shade and minimal tripping hazards, preferably with landscape buffers between roadways and walkways.	Consistent: Refer to Responses to Policies LU-1.12 and LU-3.10.
Policy LU-8.9: Encourage the design of attractive outdoor pedestrian spaces that encourage impromptu public gathering places with features such as plazas, interior walkways and paseos, ornamental gates, trellises, lighting, trees and landscaping, seating and fountains.	Consistent: Refer to Responses to Policies LU-1.12 and LU-3.10.
Policy LU-8.10: On all sides of buildings, require the incorporation of quality architectural design elements for all building façades and stepping back upper floors in order to reduce bulk and mass and to break up monotonous wall lines.	Consistent: Refer to Response to Policy LU-6.6.
Policy LU-8.13: Require parking areas associated with development to be located and designed to minimize visual impact to the greatest extent feasible. This may include locating parking behind buildings street frontage, below grade, or screening through the use of natural landscaping.	Consistent: Refer to Response to Policy LU-1.14.
Policy LU-8.14: Encourage construction of parking areas with permeable materials where appropriate.	Consistent: Refer to Response to Policy LU-1.14.
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.	Consistent: All utilities on-site would be underground. It should be noted that a generator and transformer would be located in the southeastern corner of the site. However, a metal fence, vehicular gates, and pedestrian gates would feature a combination of stucco and metal finish, which would be designed to screen the generator and transformer from views along Commercial Street and complement the proposed facility's contemporary architectural style. As such, the proposed project would comply with this policy.
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.	Consistent: Refer to Responses to Policies LU-3.10 and LU-6.6.
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.	Consistent: Refer to Response to Policy LU-8.15.

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
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.	Consistent: Refer to Responses to Policies LU-1.12, LU-3.10, and LU-6.6.
Goal LU-12: Protect San Carlos’ historic and cultural resources to maintain and enhance a unique sense of place.	
Policy LU-12.1: Evaluate historical and cultural resources early in the development review process through consultation with interested parties.	Consistent: As analyzed in Section 3.5, Cultural Resources, the 940 Commercial Street building is not considered a historic resource. Moreover, the 930 Commercial Street building and property do not meet any applicable California Register of Historical Resources (CRHR) criteria and thus are not eligible with the CRHR. As such, the 930 and 940 Commercial Street buildings and property are not a historical resource as defined by CEQA Guidelines Section 15064.5(a). Project implementation would not cause a substantial adverse change in the significance of a historical resource. No impacts would occur in this regard and the proposed project would comply with this 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	Consistent: As analyzed in Section 3.5, due to the developed and built-out nature of the project area, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, project construction activities would involve approximately 300 cubic yards of cut. Thus, project excavation could potentially encounter buried human remains. If human remains are found, those remains would require proper treatment in accordance with applicable laws. California Health and Safety Code Sections 7050.5 through 7055 describe the general provisions for human remains. Specifically, California Health and Safety Code Section 7050.5 describes the requirements if any human remains are accidentally discovered during excavation of a site. As required by State law, the requirements and procedures outlined in Section 5097.98 of the California Public Resources Code would be implemented, including notification of the County of San Mateo Coroner (County Coroner), notification of the Native American Heritage Commission (NAHC), and consultation with the individual identified by the NAHC to be the most likely descendant. If human remains are found during excavation, excavation must stop near the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, the remains have been investigated, and appropriate recommendations have been

Table 10.
General Plan Land Use Consistency Analysis

Applicable General Plan Policies	Project Consistency Analysis
	made for the treatment and disposition of the remains. Following compliance with the aforementioned regulations, impacts related to the disturbance of human remains would be less than significant. As such, the proposed project would comply with this policy.

Source: City of San Carlos, San Carlos 2030 General Plan, adopted October 12, 2009; compiled by CSG, 2025.

Eastside Innovation District Vision Plan Consistency

The project site is located within the Vision Plan area. The Vision Plan identifies opportunities for open space and the activation of public places for community enjoyment by pinpointing strategic locations throughout the Vision Plan area. Each goal and accompanying principles are intended to embody the values of the community and the desired character for the Vision Plan area. Together, these goals and principles consist of strategies, or “10 Big Moves,” and work side-by-side to implement the Vision Plan. The “10 Big Moves” include: 1) Establish Industrial Road as a green boulevard; 2) Establish an open space network; 3) Promote environmental stewardship; 4) Integrate recycled water infrastructure; 5) Support distinct District subareas; 6) Prioritize activity hubs; 7) Foster an inclusive business environment; 8) Invest in multi-modal streets; 9) Reduce congestion through coordinated transportation; and 10) Adopt a shared District parking strategy. Table 11, Vision Plan Principles Consistency Analysis, analyzes the project’s consistency with applicable goals and principles in the Vision Plan.

Table 11.
Vision Plan Principles Consistency Analysis

Applicable Vision Plan Principles	Project Consistency Analysis
Goal 2. Establish an Open Space Network: Provide a mix of accessible connected open spaces and non-vehicular connections in the District to serve existing and future District users and the greater San Carlos community.	
Principle 2.A.ii: Require non-vehicular connections, discovery paths, and mid-block connections in new development as envisioned in this plan. See Figure 23 on page 64 and Table 2 on page 62 for further guidance.	Consistent: Primary pedestrian access to the facility’s main entrance, located in the northeastern corner of the site, would be provided via the proposed sidewalk, connecting to the proposed parking lot. Secondary pedestrian access would be provided via a second entrance along the facility’s western elevation. It should be noted that a proposed 8-foot-wide public access easement along the northern site boundary would be dedicated for future use as an 8-foot-wide pedestrian pathway. The proposed sidewalk would connect to the future 8-foot-wide pedestrian pathway, which would become a segment of the future Discovery Path, anticipated to be up to 44-feet-in-width as part of the Vision Plan. The future discovery path would eventually connect with the existing pedestrian network, including the Industrial Road pedestrian facilities. Furthermore, the future discovery path would eventually connect to the proposed Commercial Street pedestrian facilities associated with the approved Alexandria Center for Life Science Project (State Clearinghouse Number

Table 11.
Vision Plan Principles Consistency Analysis

Applicable Vision Plan Principles	Project Consistency Analysis
	2021060668), anticipated as part of the Vision Plan. As such, the proposed project would comply with this principle.
Principle 2.C.ii: Design the “discovery path” as a safe, pleasant, and attractive linear park with a minimum width of 44 feet and both circulation and landscaping elements. Refer to Figure 10 on page 31 and Table 2 on page 62 for guidance on dimensions and design elements.	Consistent: Refer to Response to Principle 2.A.ii.
Principle 2.E.i: Require drought-tolerant plantings for new landscape, both within private setbacks and public right-of-ways.	Consistent: The proposed project would involve the removal of seven (7) existing on-site trees. Ornamental landscaping would be planted throughout the project site, particularly on the ground level along the northern and eastern site boundaries. Planting materials would feature drought-tolerant plants, including a mix of trees, shrubs, and groundcover, some of which would be contained in bioretention planters. On-site tree varieties would include 36-inch box species (strawberry tree multi-trunk, swan hill fruitless olive, and fem pine) and 24-inch box species (Dr. Hurd common manzanita). Shrub varieties would include Howard McMinn manzanita, California coffeeberry, and white sage. Groundcover and perennial landscaping may include giant hummingbird’s mint, purple giant hyssop, blonde ambition blue grama, Karl Foerster feather reed grass, California gray rush, mat rush, deer grass, trailing myoporum, and Margarita BOP penstemon. In total, twenty-six (26) new trees would be planted on-site, and approximately 11,775 square feet of the project site would be landscaped. The proposed project would involve the removal of one (1) existing street tree along Commercial Street. Off-site ornamental landscaping would be planted along the eastern boundary of the site. Planting materials would feature drought-tolerant plants, including a mix of trees and groundcover, consisting of silver linden (24-inch box species) and deer grass, respectively. In total, six (6) new street trees would be planted along Commercial Street right-of-way, and approximately 725 square feet of off-site areas would be landscaped. As such, the proposed project would comply with this principle.
Principle 2.E.ii: Encourage landscaping strategies that provide habitat area and increase overall District tree canopy.	Consistent: Refer to Response to Principle 2.E.i.

Table 11.
Vision Plan Principles Consistency Analysis

Applicable Vision Plan Principles	Project Consistency Analysis
Goal 4. Integrate Recycled Water Infrastructure: Reduce potable water demand within the District and throughout San Carlos by providing recycled water infrastructure.	
Principle 4.B.i: Require new buildings to be dual-plumbed with separate plumbing lines for recycled water to meet non-potable water demands including landscaping, restrooms, cooling, and other industrial processes.	Consistent: The proposed project would only utilize potable water and thus, would not be dual-plumbed with separate plumbing lines for recycled water. Nonetheless, in accordance with <i>Sequoyah Hills Homeowners Association v. City of Oakland</i> (1993) 23 Cal.App.4th, 704, 719, to be “consistent” with a plan, the project must be “compatible with the objectives, policies, general land uses, and programs specified in the applicable plan,” meaning that a project must be in “agreement or harmony” with the applicable land use plan to be consistent with that plan. As the proposed project would be consistent with the overall intent of the Vision Plan and would not preclude the attainment of its primary goals and principles, the proposed project would be considered generally “consistent” with this principle.
Principle 4.B.ii: Require new developments to install separate water services for domestic water, recycled water, and irrigation. All water services would be connected to the domestic water main initially, and then the recycled water and irrigation services would be switched over to connect to the future recycled water main when it is installed.	Consistent: Refer to Response to Principle 4.B.i.
Principle 4.B.iii: Require all plumbing and utility systems to be designed with appropriate clearances and pipe materials to allow for the use of recycled water.	Consistent: Refer to Response to Principle 4.B.i.
Goal 5. Support Distinct District Subareas: Establish two distinct subareas within the District enabling a diverse mix of businesses, development types, and uses (including residential) to thrive.	
Principle 5.A.i: Maintain development heights at 50 feet maximum (as per existing zoning regulations); potential for additional height, up to a maximum of 120 feet, may be considered through approval of a Planned Development (PD) Plan per San Carlos zoning requirements.	Consistent: The proposed facility would have a maximum height of 42 feet. As such, the proposed project would comply with this principle.
Principle 5.A.ii: Locate taller development along Industrial Road, Commercial Street, and Brittan Avenue.	Consistent: Refer to Response to Principle 5.A.i.
Principle 5.A.iii: In response to the Council’s strategic objective for the District, adopt a tiered system where new development contributes certain resources and amenities based on the scale of development. Potential resources include: community open space, non-vehicular connections, active ground floor uses, and community facilities. Refer to the Community Benefits Framework on page 72 for additional information.	Consistent: Refer to Response to Principle 2.A.ii.
Principle 5.C.i: Place buildings close to the street to support a continuous “streetwall” that frames the edges of the public realm (street, sidewalk, planting strips, and furnishing zone) and creates a vibrant and pedestrian-oriented street experience.	Consistent: Refer to Response to Principle 2.E.i. The proposed project would include a 46-foot, 5-inch front building setback. However, an 8-foot-tall decorative metal fence would surround the project site boundaries, including the project frontage along Commercial Street. The metal

Table 11.
Vision Plan Principles Consistency Analysis

Applicable Vision Plan Principles	Project Consistency Analysis
	fence would include a 12-foot setback from the Commercial Street right-of-way and thus, would be located closer to the Commercial Street frontage than the proposed building. At this distance, the metal fence would support the continuous “streetwall” concept envisioned in this policy. Moreover, cantilevered metal vehicular gates and metal pedestrian gates would be located along the eastern portion of the site. A generator and transformer would be located in the southeastern corner of the site. The metal fence, vehicular gates, and pedestrian gates would feature a combination of stucco and metal finish, which would be designed to screen the generator and transformer from views along Commercial Street and complement the proposed facility’s contemporary architectural style. The proposed project would also include a combination of building-mounted, pole-mounted, bollard-mounted, and pathway lighting on-site, including nighttime parking lot, vehicle access, security, and landscaping lighting. All light fixtures would be required to comply with the City’s lighting standards identified in Municipal Code Sections 18.15.070, Lighting and illumination, 18.29.050, Scope of design review, and 18.29.060, Design review criteria, which are intended to preserve the City’s nighttime character and reduce the potential for excessive glare or light trespass. Overall, the proposed metal fence, landscaping, and lighting would support the proposed project in supporting the continuous “street” wall concept envisioned in this policy. As such, the proposed project would comply with this principle.
Principle 5.C.ii: Use non-vehicular connections to create breaks in the “streetwall” and promote a human-scale, walkable environment throughout the District. For development located in an Activity Hub, setbacks are encouraged to create spill out space for social gathering (see Page 44)	Consistent: Refer to Response to Principle 2.A.ii.
Principle 5.C.iii: Design new buildings to engage the street with articulated entries, visually interesting materials, and changes in massing and scale that contribute to a pleasant, human-scale environment.	Consistent: Refer to Response to Principle 5.C.i. The proposed facility would have a maximum height of 42 feet. The building’s architecture would consist of wide, durable, flat vertical metal panels with projected fins and glazed storefront-style windows with framed metal. The facility’s exterior would include a

Table 11.
Vision Plan Principles Consistency Analysis

Applicable Vision Plan Principles	Project Consistency Analysis
	combination of colors, including white, light gray, and dark gray. It should be noted that an 8-foot-tall decorative metal fence would surround the project site boundaries, including the project frontage along Commercial Street. The metal fence would include a 12-foot setback from the Commercial Street right-of-way and thus would be located closer to the Commercial Street frontage than the proposed building. The metal fence would serve as a primary focal point and thus, screen and break up the massing of the proposed facility. The proposed project would also include a 46-foot, 5-inch front setback; a 61-foot, 10-inch interior side (east) setback; a 6-foot, 2-inch interior side (west) setback; and a 9-foot, 5-inch rear setback.
Goal 8. Invest in Multi-Modal Streets: Promote safe and accessible walking and bike trips to, from, and within the District for all users, while balancing the freight circulation and loading needs of industrial commercial uses.	
Principle A: Adopt street hierarchy guidelines for all public rights-of-way and new non-vehicular connections within the District. <i>Refer to Table 1. Public Rights-of-Way Principles.</i>	Consistent: Refer to Responses to Principles 2.A.ii and 5.C.iii.

Source: City of San Carlos, East Side Innovation District Vision Plan, approved October 25, 2021; compiled by CSG, 2025.

Zoning Code Consistency

The project site is currently zoned as IH. The IH district includes various lot and density, building form and location, transitional, and landscaping development standards related to scenic quality. Refer to Table 1, Municipal Code Governing Scenic Quality Consistency Analysis, of this Initial Study for a consistency analysis of the proposed project and relevant IH district development standards.

As analyzed in Tables 1, 10, and 11, the project would be consistent with applicable General Plan policies, Vision Plan principles, and IH district development standards. As such, impacts would be less than significant in this regard.

Conclusion

Upon approval of the anticipated discretionary and ministerial permits and approvals, the project would be consistent with the General Plan, Vision Plan, and Zoning Code. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to land use and planning; therefore, no mitigation measures are required.

3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – 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?	☐	☐	☐	☒

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to mineral resources include:

- Surface Mining and Reclamation Act of 1975 (SMARA)
- 2045 General Plan Reset Environmental Impact Report (General Plan EIR)

Environmental Setting

SMARA regulates surface mining operations and encourages the production, conservation, and protection of the State's mineral resources, and limits new development in areas with significant deposits of minerals. SMARA also classifies areas into Mineral Resource Zones (MRZs), which identify whether known or inferred significant mineral resources are present in an area. According to the California Department of Conservation, the project site is designated MRZ-1.²⁸ MRZ-1 is defined as areas where available geologic information indicates that little likelihood exists for the presence of significant concrete aggregate resources. Furthermore, according to the General Plan EIR, no mineral resources have been historically extracted or are currently being commercially extracted within the City of San Carlos (City).

a) *Would the project 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?*

No Impact: The project site is designated MRZ-1. Furthermore, according to the General Plan EIR, no mineral resources have been historically extracted or are currently being commercially extracted within the City. The project site is currently occupied with two (2) existing single-story industrial buildings. Demolition of the existing industrial buildings and construction and operation of the proposed facility would not result in the loss of known mineral resources. As such, no impact would occur in this regard.

b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Impact: Refer to Response 3.12(a). No impact would occur in this regard.

²⁸ California Department of Conservation, Special Report 146, Mineral Land Classification: Aggregate Materials in the San Francisco – Monterey Bay Area, 1986.

MITIGATION MEASURES

Project implementation would not result in significant impacts related to mineral resources; therefore, no mitigation measures are required.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE – 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 applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
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?	☐	☐	☒	☐

The information presented in this analysis is primarily based on the 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California (Noise Study), prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Regulatory Setting

Regulatory Background – Noise

Federal agencies, the State of California (State or California), and the City of San Carlos (City) have established noise and vibration criteria that are applicable to noise assessments. The California Environmental Quality Act (CEQA) Guidelines, Appendix G, are used to assess the potential significance of impacts pursuant to local general plan policies, municipal code standards, or the applicable standards of other agencies. A summary of the applicable regulatory criteria for the proposed project is provided below.

Federal Regulations

The Federal Transit Administration (FTA) has identified construction noise thresholds in the Transit Noise and Vibration Impact Assessment Manual, which limits daytime construction noise to 80 A-weighted sound level (dBA) L_{eq} for residential land uses, 85 dBA L_{eq} for commercial and office uses, and 90 dBA L_{eq} for industrial land uses.

State Regulations

CEQA contains guidelines to evaluate the significance of effects of environmental noise attributable to a proposed project. Under CEQA, noise impacts would be considered significant if the project would result in:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local General Plan or Noise Ordinance, or applicable standards of other agencies;

- Generation of excessive groundborne vibration or groundborne noise levels; or
- 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, if the project would expose people residing or working in the project area to excessive noise levels.

Local Regulations

The City of San Carlos adopted the San Carlos 2030 General Plan (General Plan) in October 2009. The Noise Element of the General Plan provides goals, policies, and actions to maintain a community with a noise environment that supports a high quality of life. The goals, policies, and actions that apply to the proposed project are as follows:

Goal NOI-1: Encourage compatible noise environments for new development and control sources of excessive noise citywide.

- 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.
- 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 uses to noise level standards as indicated in Table 9-1.
- Policy NOI-1.6. Where noise mitigation measures are required to achieve the noise level standards, the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered after practical design-related noise mitigation measures have been integrated into the project.
- 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-1.9. Minimize potential transportation-related noise through the use of setbacks, street circulation design, coordination of routing and other traffic control measures and the construction of noise barriers and consider use of "quiet" pavement surfaces when resurfacing roadways.
- Policy NOI-1.12. Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan.
- Action NOI-1.2. Revise the City's Noise Ordinance to be consistent with this Element.
- 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 Ldn at noise-sensitive uses to increase by 3 dBA or more and exceed the "normally acceptable" level.
 - b. Cause the Ldn at noise-sensitive uses to increase by 5 dBA or more and remain "normally acceptable."
 - c. Cause noise levels to exceed the limits in Table 9-1.
- Action NOI-1.5. Enforce Section 27007 of the California Motor Vehicle Code that prohibits amplified sound that can be heard 50 or more feet from a vehicle.
- Action NOI-1.6. Enforce Section 27150 of the California Motor Vehicle Code that addresses excessive exhaust noise.
- Action NOI-1.7. Update and review procedures for dealing with noise complaints in the community.

San Carlos Municipal Code (Municipal Code) Chapter 9.30, Noise Control, seeks to protect the peace, health and safety of its citizens from unnecessary and unreasonable noises produced by any machine, person or device.

Municipal Code Section 9.30.030, Basic noise regulation, states that unless otherwise permitted under Municipal Code Chapter 9.30, no person may cause and no property owner may permit, a noise produced by any person, amplified sound or device, or any combination thereof in excess of the noise limits established in Municipal Code Table 18.21.050-A, Noise Limits, to emanate from any property, public or private, as measured at the receiving property line.

Municipal Code Section 9.30.070, Exempt activities, lists the following noise-generating activities as exempt from the provisions of Municipal Code Chapter 9.30:

- A. Transportation facilities, such as freeways, airports, buses, and railroads;
- B. Construction activities: such activities, however, shall be limited to the hours of eight a.m. to six p.m. Monday through Friday, and nine a.m. to five p.m. on Saturdays and Sundays. No construction noise-related activities on the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, 4th of July, Labor Day, Veteran's Day, Thanksgiving Day and Christmas Day. All gasoline-powered construction equipment shall be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted (the Building Official shall have the authority to grant exceptions to construction noise-related activities);
- C. Home workshops and gas-powered gardening equipment; such activities, however, shall be limited to the hours of eight a.m. to sunset Monday through Friday, and ten a.m. to sunset on Saturday, Sunday and holidays stated in subsection B of this section;
- D. Public works and public utilities activities; such activities, however, shall be limited to the hours set forth under subsection B of this section, except for emergency situations (the Public Works Director shall have the authority to grant exceptions to public works and public utilities construction noise-related activities);
- E. Emergency vehicles;
- F. Solid waste pickup: such activities, however, shall be limited to the hours of collection set forth under the applicable franchise agreement for solid waste pickup, recyclable materials pickup and/or organic materials pickup as may be restricted for residential, commercial and City facilities.

Municipal Code Chapter 18.21, Performance Standards, provides performance standards for noise and vibration. The following performance standards apply to the proposed project regarding noise:

Municipal Code Section 18.21.050, Noise.

- A. Noise Limits. No use or activity shall create noise levels that exceed the following standards. The maximum allowable noise levels specified in Table 18.21.050-A, Noise Limits, do not apply to noise generated by automobile traffic or other mobile noise sources in the public right-of-way.
 - 1. Adjustments to Noise Limits. The maximum allowable noise levels of Table 18.21.050- A, Noise Limits, shall be adjusted according to the following provisions. No more than one increase in the maximum permissible noise level shall be applied to the noise generated on each property.
 - a) Ambient Noise. If the ambient noise level at a noise-sensitive use is ten dBA or more below the standard, the allowable noise standard shall be decreased by five decibels.
 - b) Duration. The maximum allowable noise level (L_{50}) shall be increased as follows to account for the effects of duration:
 - i. Noise that is produced for no more than a cumulative period of fifteen minutes in any hour may exceed the noise limit by five decibels.
 - ii. Noise that is produced for no more than a cumulative period of five minutes in any hour may exceed the noise limits by ten decibels; and

- iii. Noise that is produced for no more than a cumulative period of one minute in any hour may exceed the noise limit by fifteen decibels.
- 2. Character of Sound. If a noise contains a steady audible tone or is a repetitive noise (such as hammering or riveting) or contains music or speech conveying informational content, the maximum allowable noise levels shall be reduced by five decibels.
- 3. Prohibited Noise. Noise for a cumulative period of thirty minutes or more in any hour which exceeds the noise standard for the receiving land use.
- B. Noise Exposure – Land Use Requirements and Limitations. Table 18.21.050-B, Noise Exposure—Land Requirements and Limitations, describes the requirements and limitations of various land uses within the listed day/night average sound level (Ldn) ranges.
- C. Acoustic Study. The Director may require an acoustic study for any proposed project that could cause any of the following:
 - 1. Locate new residential uses within the fifty-five CNEL impact area of the San Carlos Airport;
 - 2. Cause noise levels to exceed the limits in Table 18.21.050-A;
 - 3. Create a noise exposure that would require an acoustic study and noise attenuation measures listed in Table 18.21.050-B, Noise Exposure – Land Use Requirements and Limitations; or
 - 4. Cause the Ldn at noise-sensitive uses to increase three dBA or more.
- D. Establishing Ambient Noise. When the Director has determined that there could be cause to make adjustments to the standards, an acoustical study shall be performed to establish ambient noise levels. In order to determine if adjustments to the standards should be made either upwards or downwards, a minimum twenty-four-hour-duration noise measurement shall be conducted. The noise measurements shall collect data utilizing noise metrics that are consistent with the noise limits presented in Table 18.21.050-A, e.g., L_{max} (zero minutes), L_{02} (one minute), L_{08} (five minutes), L_{25} (fifteen minutes) and L_{50} (thirty minutes). An arithmetic average of these ambient noise levels during the three quietest hours shall be made to demonstrate that the ambient noise levels are regularly ten or more decibels below the respective noise standards. Similarly, an arithmetic average of ambient noise levels during the three loudest hours should be made to demonstrate that ambient noise levels regularly exceed the noise standards.
- E. Noise Attenuation Measures. Any project subject to the acoustic study requirements of subsection C of this section may be required as a condition of approval to incorporate noise attenuation measures deemed necessary to ensure that noise standards are not exceeded.
 - 1. New noise-sensitive uses (e.g., schools, hospitals, churches, and residences) shall incorporate noise attenuation measures to achieve and maintain an interior noise level of forty-five dBA.
 - 2. Noise attenuation measures identified in an acoustic study shall be incorporated into the project to reduce noise impacts to satisfactory levels.
 - 3. Emphasis shall be placed upon site planning and project design measures. The use of noise barriers shall be considered and may be required only after all feasible design-related noise measures have been incorporated into the project.

Regulation Background – Vibration

State Regulations

To avoid damage to buildings, the California Department of Transportation (Caltrans) recommends that construction vibration levels are limited to 0.5 in/sec Peak Particle Velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and 0.25 in/sec PPV for historic buildings or some old buildings; refer to Table 14, Reaction of People and Damage to Buildings from Continuous or Frequent Intermittent Vibration Levels.

Local Regulations

Municipal Code Chapter 18.21 includes the following performance standards regarding vibration:

Municipal Code Section 18.21.060, Vibration, states that no vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) are exempt from this standard.

Environmental Setting

Fundamentals of Environmental Noise

Noise may be defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. The objectionable nature of sound could be caused by its pitch or its loudness. Pitch is the height or depth of a tone or sound, depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher-pitched signals sound louder to humans than sounds with a lower pitch. Loudness is the intensity of sound waves combined with the reception characteristics of the ear. Intensity may be compared with the height of an ocean wave in that it is a measure of the amplitude of the sound wave.

In addition to the concepts of pitch and loudness, there are several noise measurement scales that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative amplitude of a sound. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 decibels represents a tenfold increase in acoustic energy, while 20 decibels is 100 times more intense, 30 decibels is 1,000 times more intense, etc. There is a relationship between the subjective noisiness or loudness of a sound and its intensity. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness over a fairly wide range of intensities. Technical terms are defined in Table 12, Definition of Acoustical Terms.

Table 12.
Definition of Acoustical Terms

Term	Definition
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20 micro-Pascals.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micro-Pascals (or 20 micro-Newtons per square meter), where 1 Pascal is the pressure resulting from a force of 1 Newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micro-Pascals). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 hertz and 20,000 Hz. Infrasonic sounds are below 20 Hz and Ultrasonic sounds are above 20,000 Hz.

Term	Definition
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average A-weighted noise level during the measurement period.
L_{max} , L_{min}	The maximum and minimum A-weighted noise level during the measurement period.
L_{01} , L_{10} , L_{50} , L_{90}	The A-weighted noise levels that are exceeded 1 percent, 10 percent, 50 percent, and 90 percent of the time during the measurement period.
Day/Night Noise Level (Ldn or DNL)	The average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 p.m. and 7:00 a.m.
Community Noise Equivalent Level (CNEL)	The average A-weighted noise level during a 24-hour day, obtained after addition of 5 decibels in the evening from 7:00 p.m. to 10:00 p.m. and after addition of 10 decibels to sound levels measured in the night between 10:00 p.m. and 7:00 a.m.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

There are several methods of characterizing sound. The most common in California is dBA. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Representative outdoor and indoor noise levels in units of dBA are shown in Table 13, Typical Noise Levels in the Environment.

Table 13.
Typical Noise Levels in the Environment

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110 dBA	Rock band
Jet fly-over at 1,000 feet		
	100 dBA	
Gas lawn mower at 3 feet		
	90 dBA	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	80 dBA	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	70 dBA	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	60 dBA	
		Large business office
Quiet urban daytime	50 dBA	Dishwasher in next room
Quiet urban nighttime	40 dBA	Theater, large conference room
Quiet suburban nighttime		
	30 dBA	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	20 dBA	
		Broadcast/recording studio
	10 dBA	
	0 dBA	

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. This energy-equivalent sound/noise descriptor is called L_{eq} . The most common averaging period is hourly, but L_{eq} can describe any series of noise events of arbitrary duration.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance the receptor is from the noise source. Close to the noise source, the models are accurate to within about plus or minus 1 to 2 dBA.

Since the sensitivity to noise increases during the evening and at night - because excessive noise interferes with the ability to sleep - 24-hour descriptors have been developed that incorporate artificial noise penalties added to quiet-time noise events. The Community Noise Equivalent Level (CNEL) is a measure of the cumulative noise exposure in a community, with a 5 dB penalty added to evening (7:00 p.m. to 10:00 p.m.) and a 10 dB penalty added to nocturnal (10:00 p.m. to 7:00 a.m.) noise levels. The Day/Night Average Sound Level (DNL or Ldn) is essentially the same as CNEL, with the exception that the evening time period is dropped and all occurrences during this three-hour period are grouped into the daytime period.

Effects of Noise

Sleep and Speech Interference

The thresholds for speech interference indoors are about 45 dBA if the noise is steady and above 55 dBA if the noise is fluctuating. Outdoors, the thresholds are about 15 dBA higher. Steady noises of sufficient intensity (above 35 dBA) and fluctuating noise levels above about 45 dBA have been shown to affect sleep. Interior residential standards for multi-family dwellings are set by California at 45 dBA DNL. Typically, the highest steady traffic noise level during the daytime is about equal to the DNL, and nighttime levels are 10 dBA lower. The standard is designed for sleep and speech protection, and most jurisdictions apply the same criterion for all residential uses. Typical structural attenuation is 12 to 17 dBA with open windows. With closed windows in good condition, the noise attenuation factor is around 20 dBA for an older structure and 25 dBA for a newer dwelling. Sleep and speech interference are therefore possible when exterior noise levels are about 57 to 62 dBA DNL with open windows and 65 to 70 dBA DNL if the windows are closed. Levels of 55 to 60 dBA are common along collector streets and secondary arterials, while 65 to 70 dBA is a typical value for a primary/major arterial. Levels of 75 to 80 dBA are normal noise levels at the first row of development outside a freeway right-of-way. In order to achieve an acceptable interior noise environment, bedrooms facing secondary roadways need to be able to have their windows closed; those facing major roadways and freeways typically need special glass windows.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community from noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that the causes for annoyance include interference with speech, radio, and television, house vibrations, and interference with sleep and rest. The DNL, as a measure of noise, has been found to provide a valid correlation between noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. When measuring the percentage of the population highly annoyed, the threshold for ground vehicle noise is about 50 dBA DNL. At a DNL of about 60 dBA, approximately 12 percent of the population is highly annoyed. When the DNL increases to 70 dBA, the percentage of the population highly annoyed increases to about 25 to 30 percent of the population. There is, therefore, an increase of about 2 percent per dBA between a DNL of 60 and 70 dBA. Between a DNL of 70 to 80 dBA, each additional decibel increases the percentage of the population highly annoyed by about 3 percent. People appear to respond more adversely to aircraft noise. When the DNL is 60 dBA, approximately 30 to 35 percent of the population is believed to be highly annoyed. Each decibel increase to 70 dBA adds about 3 percentage points to the number of people highly annoyed. Above 70 dBA, each decibel increase results in about a 4 percent increase in the percentage of the population highly annoyed.

Fundamentals of Groundborne Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One method is PPV. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. For the purposes of this analysis, a PPV descriptor with units of mm/sec or in/sec is used to evaluate construction-generated vibration for building damage and human complaints. Table 14 displays the reactions of people and the effects on buildings that continuous or frequent intermittent vibration levels produce. The guidelines in Table 14 represent syntheses of vibration criteria for human response and potential damage to buildings resulting from construction vibration.

Construction activities can cause vibration that varies in intensity depending on several factors. The use of pile driving and vibratory compaction equipment typically generates the highest construction-related groundborne vibration levels. Because of the impulsive nature of such activities, the use of the PPV descriptor has been routinely used to

measure and assess groundborne vibration, and almost exclusively to assess the potential of vibration to cause damage and the degree of annoyance for humans.

The two primary concerns with construction-induced vibration (i.e., the potential to damage a structure and the potential to interfere with the enjoyment of life) are evaluated against different vibration limits. Human perception of vibration varies with the individual and is a function of physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as people in an urban environment, may tolerate a higher vibration level.

Structural damage can be classified as cosmetic only, such as paint flaking or minimal extension of cracks in building surfaces; minor, including limited surface cracking; or major, which may threaten the structural integrity of the building. Safe vibration limits that can be applied to assess the potential for damaging a structure vary by researcher. The damage criteria presented in Table 14 include several categories for ancient, fragile, and historic structures, the types of structures most at risk of damage. Most buildings are included within the categories ranging from “Historic and some old buildings” to “Modern industrial/commercial buildings.” Construction-induced vibration that can be detrimental to the building is very rare and has only been observed in instances where the structure is at a high state of disrepair and the construction activity occurs immediately adjacent to the structure.

Table 14.
Reaction of People and Damage to Buildings from Continuous or Frequent Intermittent Vibration Levels

Velocity Level, PPV (in/sec)	Human Reaction	Effect on Buildings
0.01	Barely perceptible	No effect
0.04	Distinctly perceptible	Vibration unlikely to cause damage of any type to any structure
0.08	Distinctly perceptible to strongly perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
0.1	Strongly perceptible	Threshold at which there is a risk of damage to fragile buildings with no risk of damage to most buildings
0.25	Strongly perceptible to severe	Threshold at which there is a risk of damage to historic and some old buildings.
0.3	Strongly perceptible to severe	Threshold at which there is a risk of damage to older residential structures
0.5	Severe – Vibrations considered unpleasant	Threshold at which there is a risk of damage to new residential and modern commercial/industrial structures

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

The annoyance levels shown in Table 14 should be interpreted with care since vibration may be found to be annoying at lower levels than those shown, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibrations, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

Existing Noise Environment

The project site is located at 930 Commercial Street within San Carlos. The project site is bound by light industrial and commercial uses to the north and west and by office buildings to the east. Commercial Street is south of the project site, with additional office and industrial buildings located opposite the roadway. The nearest residences are located over 1,000 feet north of the project site.

The noise environment at the site and in the surrounding areas results primarily from traffic along nearby Industrial Road and Highway 101. Train activity along the Caltrain tracks, about 1,040 feet to the west, and aircraft associated with the San Carlos Airport and San Francisco International Airport also contribute to the noise environment.

A noise monitoring survey, which included two (2) long-term (LT-1 and LT-2) and three (3) short-term (ST-1 through ST-3) noise measurements, was conducted at the site beginning on Wednesday, September 10, 2025, and concluding on Friday, September 12, 2025. All measurement locations are shown in Noise Study Figure 1, Aerial Image of the Project Site and Surrounding Area with Long- and Short-Term Measurement Locations Identified.

Long-term noise measurement LT-1 was obtained/installed in a tree in the southwestern corner of the project site, approximately 35 feet from the center of Commercial Street. This LT measurement represents the existing noise environment at the project site and the immediate surrounding area. Hourly average noise levels at LT-1 typically ranged from 52 to 62 dBA L_{eq} during daytime hours (between 7:00 a.m. and 10:00 p.m.) and from 50 to 59 dBA L_{eq} during nighttime hours (between 10:00 p.m. and 7:00 a.m.). The day-night average noise level (Ldn) measured on Thursday, 17 September 11, 2025, was 62 dBA. The daily trends in noise levels at LT-1 are shown in Noise Study Appendix Figures A1 through A3.

LT-2 was obtained/installed on a utility pole between the residences at 904 and 910 Hall Street. LT-2 was set back approximately 20 feet from the Hall Street centerline and approximately 100 feet from the Industrial Road centerline. Hourly average noise levels at LT-2 typically ranged from 55 to 66 dBA L_{eq} during the day and from 46 to 62 dBA L_{eq} at night. The day-night average noise level was 63 dBA Ldn on Thursday, September 11, 2025. The daily trends in noise levels at LT-2 are shown in shown in Noise Study Appendix Figures A4 through A6.

Each short-term noise measurement was conducted on Wednesday, September 10, 2025, in 10-minute intervals between 10:40 a.m. and 11:30 a.m. Table 15, Summary of Short-Term Noise Measurement Data (dBA), summarizes the measurements at each short-term location.

Table 15.
Summary of Short-Term Noise Measurement Data (dBA)

Noise Measurement Location (Date, Time)	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	L_{eq}
ST-1: North property line of project site (9/10/2025, 10:40 a.m. -10:50 a.m.)	64	63	61	57	55	58
ST-2: approximately 20 feet southwest of the Bayport Avenue centerline (9/10/2025, 11:00 a.m. -11:10 a.m.)	78	75	56	50	48	59
ST-3: Front of 985 Hall Street (9/10/2025, 11:20 a.m. -11:30 a.m.)	65	62	51	46	43	50

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

ST-1 was obtained/installed between the existing buildings on the project site, near the north property line of the site. The setback of ST-1 from the Commercial Street centerline was approximately 245 feet. The dominant noise source at ST-1 was mechanical equipment and heavy equipment from the concrete plant to the north. Specific noise sources included material dumping (61 to 62 dBA), air release (55 to 62 dBA), a mobile loader (58 dBA), backup

beeping (60 dBA), and plant operations (60 to 63 dBA). When the plant operations were off, the background noise was about 52 dBA. The 10-minute average noise level at ST-1 was 58 dBA.

ST-2 was obtained/installed along Bayport Avenue, halfway between Hall Street and Terminal Way. ST-2 was set back approximately 20 feet from the Bayport Avenue centerline. Local traffic along Bayport Avenue (two passenger cars), nearby Hall Street (four passenger cars), and nearby Terminal Way (12 passenger cars) generated noise levels of 52 to 78 dBA at ST-2. Other contributing noise sources included car doors slamming (55 to 57 dBA), cars starting (53 dBA), and car horns (61 dBA). The 10-minute average noise level at ST-2 was 59 dBA.

ST-3 was obtained/installed in front of the 985 Hall Street residence, approximately 15 feet from the centerline of Hall Street. Traffic along Hall Street, which included three passenger cars, produced noise levels of 42 to 65 dBA. In the absence of Hall Street traffic, background traffic noise generated noise levels of 42 to 45 dBA. Additional noise sources included a distant siren (45 to 61 dBA), a distant noisy car (51 dBA), a distant motorcycle (53 dBA), and a jet (48 dBA). The 10-minute average noise level at ST-3 was 50 dBA L_{eq} .

- a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Less Than Significant Impact:

Temporary Construction Noise

The construction schedule assumed the development would be built over a period of about 24 months; however, it should be noted that the construction schedule would occur over 19 months and thus, the 24 month assumption would be more conservative (i.e., due to the longer duration of construction activities). Construction phases would include demolition, site preparation, grading, building construction, architectural coating, and paving. During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary by phase and vary within phases, based on the amount of equipment in operation and the location at which the equipment is operating.

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Municipal Code Chapter 9.30.070 limits construction activities to between the allowable construction hours, which are limited to between 8:00 a.m. and 5:00 p.m. on weekdays (Monday through Friday), and 9:00 a.m. and 5:00 p.m. on Saturdays. No construction is allowed on Sundays. Additionally, Municipal Code Section 9.30.070(B) requires all gasoline-powered construction equipment to be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted.

While the City does not establish noise level thresholds for construction activities, the noise limits established by the FTA are utilized to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the Transit Noise and Vibration Impact Assessment Manual. During daytime hours, an exterior threshold of 85 dBA L_{eq} must be enforced at commercial and office uses and 90 dBA L_{eq} must be enforced at industrial land uses.

Construction activities for individual projects are typically carried out in phases. During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary by phase and vary within phases,

based on the amount of equipment in operation and the location at which the equipment is operating. The typical range of maximum instantaneous noise levels for the proposed project would be 70 to 90 dBA maximum sound level (L_{max}) at a distance of 50 feet (refer to Table 16, Construction Equipment, 50-foot Noise Emission Limits) from the equipment.

Table 17, Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA), shows the hourly average noise level ranges, by construction phase, typical for various types of projects. Hourly average noise levels generated by construction are about 71 to 89 dBA L_{eq} for light industrial facilities, measured at a distance of 50 feet from the center of a busy construction site. Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain often results in lower construction noise levels at distant receptors.

Equipment expected to be used in each construction stage is summarized in Table 18, Construction Noise Levels for the Proposed Project at a Distance of 50 Feet, along with the quantity of each type of equipment and the reference noise level at 50 feet, assuming the operation of the two loudest pieces of construction equipment for each construction stage.

The Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) was used to calculate the hourly average noise levels for each phase of construction, assuming the two loudest pieces of equipment would operate simultaneously, as recommended by the FTA for construction noise evaluations. This construction noise model includes representative sound levels for the most common types of construction equipment and the approximate usage factors of such equipment that were developed based on an extensive database of information gathered during the construction of the Central Artery/Tunnel Project in Boston, Massachusetts (CA/T Project or "Big Dig"). The usage factors represent the percentage of time that the equipment would be operating at full power.

To assess construction noise impacts at the receiving property lines of existing receptors surrounding the project site, the worst-case hourly average noise level, which is calculated by combining all pieces of equipment per phase, was propagated from the geometrical center of the construction sites for each phase to the nearest receiving property lines. These noise level estimates are shown in Table 19, Construction Noise Levels at Nearby Land Uses, for each respective phase. For all receptors with direct line-of-sight, no noise level reductions are applied to the noise levels in Table 18; however, the nearest residences are more than 1,000 feet away, with several rows of intervening buildings between the project site and the receptors. A conservative 20 dBA attenuation is applied to noise levels for these receptors.

Table 16.
Construction Equipment, 50-Foot Noise Emission Limits

Equipment Category	L_{max} Level (dBA) ^{1,2}	Impact/Continuous
Arc Welder	73	Continuous
Auger Drill Rig	85	Continuous
Backhoe	80	Continuous
Bar Bender	80	Continuous
Boring Jack Power Unit	80	Continuous
Chain Saw	85	Continuous
Compressor ³	70	Continuous
Compressor (other)	80	Continuous
Concrete Mixer	85	Continuous

Equipment Category	L _{max} Level (dBA) ^{1,2}	Impact/Continuous
Concrete Pump	82	Continuous
Concrete Saw	90	Continuous
Concrete Vibrator	80	Continuous
Crane	85	Continuous
Dozer	85	Continuous
Excavator	85	Continuous
Front End Loader	80	Continuous
Generator	82	Continuous
Generator (25 kVA or less)	70	Continuous
Gradall	85	Continuous
Grader	85	Continuous
Grinder Saw	85	Continuous
Horizontal Boring Hydro Jack	80	Continuous
Hydra Break Ram	90	Impact
Impact Pile Driver	105	Impact
Insitu Soil Sampling Rig	84	Continuous
Jackhammer	85	Impact
Mounted Impact Hammer (hoe ram)	90	Impact
Paver	85	Continuous
Pneumatic Tools	85	Continuous
Pumps	77	Continuous
Rock Drill	85	Continuous
Scraper	85	Continuous
Slurry Trenching Machine	82	Continuous
Soil Mix Drill Rig	80	Continuous
Street Sweeper	80	Continuous
Tractor	84	Continuous
Truck (dump, delivery)	84	Continuous
Vacuum Excavator Truck (vac-truck)	85	Continuous
Vibratory Compactor	80	Continuous
Vibratory Pile Driver	95	Continuous
All other equipment with engines larger than 5 HP	85	Continuous

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

¹ Measured at 50 feet from the construction equipment, with a “slow” (1 sec.) time constant.

² Noise limits apply to total noise emitted from equipment and associated components operating at full power while engaged in its intended operation.

³ Portable Air Compressor rated at 75 cfm or greater and that operates at greater than 50 psi.

Table 17.
Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)

	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Religious Amusement and Recreation, Store, Service Station		Public Works Roads and Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

I = All pertinent equipment present at the site.

II = Minimum required to be present at the site.

Table 18.
Construction Noise Levels for the Proposed Project at a Distance of 50 Feet

Noise Measurement Location (Date, Time)	Total Workdays	Construction Equipment (Quantity)	Estimated Construction Noise Level at 50 Feet, $dBA L_{eq}$
Demolition	20	Concrete/Industrial Saw (1) ^a Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (3) ^a	85
Site Preparation	2	Grader (1) ^a Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1) ^a	84
Grading/Excavation	4	Grader (1) ^a Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2) ^a	84
Trenching/Foundation	4	Tractor/Loader/Backhoe (1) ^a Excavator (1) ^a	82
Building – Exterior	200	Crane (1) Forklift (1) Generator Set (1) ^a Tractor/Loader/Backhoe (1) ^a Welder (3)	82
Building – Interior/Architectural Coating	10	Air Compressor (1) ^a	74
Paving	10	Cement and Mortar Mixer (1) Paver (1) Paving Equipment (1) ^a Roller (1) Tractor/Loader/Backhoe (1) ^a	84

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

^a Denotes two loudest pieces of construction equipment per phase.

Table 19.
Construction Noise Levels at Nearby Land Uses

Phase of Construction	Calculated Hourly Average Noise Levels, dBA L_{eq}				
	North Light Industrial (110 feet)	West Commercial and Light Industrial (150 feet)	East Offices (150 feet)	South Offices and Light Industrial (180 feet)	Nearest Residences (1,130 feet)
Demolition	81	78	78	76	40 ^a
Site Preparation	78	75	75	73	38 ^a
Grading/Excavation	79	76	76	75	39 ^a
Trenching/Foundation	75	72	72	71	35 ^a
Building – Exterior	76	74	74	72	36 ^a
Building – Interior/Architectural Coating	67	64	64	63	27 ^a
Paving	79	76	76	74	38 ^a

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

^a A conservative 20 dBA attenuation assumed for intervening buildings.

As shown in Table 18, construction noise levels would intermittently range from 74 to 85 dBA L_{eq} when activities occur 50 feet from nearby receptors. When activities are focused near the center of the project site, construction noise levels would typically range from 64 to 78 dBA L_{eq} at the surrounding light industrial and office receptors and below 50 dBA L_{eq} at the nearest residences.

Reasonable regulation of the hours of construction, as well as regulation of the arrival and operation of heavy equipment and the delivery of construction material, is necessary to protect the health and safety of persons, promote the general welfare of the community, and maintain the quality of life.

General Plan Policy NOI-1.8 requires all phases of construction activity to utilize reasonable noise reduction measures to minimize the exposure of neighboring properties to excessive noise levels and comply with the City's noise ordinance. Municipal Code Chapter 9.30.070 limits construction activities to between 8:00 a.m. and 5:00 p.m. on weekdays (Monday through Friday), and 9:00 a.m. and 5:00 p.m. on Saturdays. No construction is allowed on Sundays. Further, Municipal Code Section 9.30.070(B) requires all gasoline-powered construction equipment to be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted. In accordance with General Plan Policy NOI-1.8, reasonable noise reduction measures must be incorporated into all projects within the City. Such measures must include, but are not limited to, the following to reduce construction noise levels as low as practical:

- Limit construction activities to between 8:00 a.m. and 5:00 p.m. on weekdays (Monday through Friday), and 9:00 a.m. and 5:00 p.m. on Saturdays, with no construction on the following holidays: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, 4th of July, Labor Day, Veterans' Day, Thanksgiving Day, and Christmas Day;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;

- Locate staging areas and construction material areas as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented.
- Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction.

With the implementation of these noise control measures outlined in the Municipal Code and General Plan, temporary construction noise impacts would be less than significant.

Cumulative Impacts

Cumulative noise impacts would include either cumulative traffic noise increases under future conditions or temporary construction noise from cumulative construction projects.

According to the Noise Study, the following planned or approved projects are located within 1,000 feet of the proposed project:

- Alexandria Center for Life Science – this project is located at 900, 960, 961, 967 Industrial Road; 1003, 1011 Commercial Street; and 915, 1055, 1063 Old County Road. This project is located immediately south of the project site, opposite Commercial Street. This project was identified as an existing receptor in the Noise Study. This project involves the construction of an office/research and development campus-style development on approximately 25.34 acres. This project is in the planning review phase. While the construction schedule for this project is currently unknown, it is likely to be constructed after the proposed project at 930 Commercial Street. The nearest residential uses are over 1,000 feet north of the proposed project site; however, office to the east at 894 Industrial Road and commercial/light industrial to the west at 950 Commercial/1000 Commercial would be shared receptors for both construction sites. With the loud existing noise environment at the project site and the surrounding area and considering that the Alexandria Center for Life Science project is likely to be constructed after the proposed project, a cumulative construction impact is not anticipated. Impacts would be less than significant in this regard.
- 1030 Brittan Avenue – this project is located at 1030 Brittan Avenue. This project site is approximately 870 feet south of the project site. This project involved replacing an existing parking lot with a new three-story research and development life science building. The proposed building consists of one level of underground parking, a first floor that includes parking and tenant space, and two levels of laboratory and office area. The three-story building is built to a height of 47 feet to the top of the roof, and 58 feet to the top of the roof screen. Parking is provided through the underground parking, ground-level two-tier stackers, and utilization of a portion of the existing lot, which is shared with 930 Brittan Avenue. This project has been constructed at the time of this Initial Study. Since this project has been constructed, this project would not share receptors with direct line-of-sight to the proposed project’s construction site. As such, impacts would be less than significant in this regard.
- 789 Old County Road– this project is located at 789 Old County Road. This project site is approximately 850 feet northwest of the project site. This project includes demolition of the existing buildings and construction of two new Life Science Research and Development buildings and one (1) parking structure. The project includes one building with four (4) stories of office/lab space and a second building with five (5) stories of office/lab space. The parking structure is proposed with seven levels of parking. This project is anticipated to be presented to the City of San Carlos City Council for approval on October 27, 2025; however, at the time of

this Initial Study, the project has yet to be approved. This project would not share receptors with direct line-of-sight to both construction sites. As such, impacts would be less than significant in this regard.

- 841 Old County Road– this project is located at 841 Old County Road. This project site is approximately 800 feet southwest of the project site. This project includes demolition of the existing buildings and construction of two (2) new Life Science Research and Development buildings. The project includes three (3) and four (4) stories of office/lab space above one (1) level of at-grade parking and two (2) levels of below-grade parking. This project has been approved, but has not been constructed at the time of this Initial Study. This project would not share receptors with direct line-of-sight to both construction sites. As such, impacts would be less than significant in this regard.
- 888 Bransten Road– this project is located at 888 Bransten Road. This project site is approximately 485 feet north of the project site. This project includes the construction of a new three-story building for office, research and development, or technology use. This project has been approved, but has not been constructed at the time of this Initial Study. This project would not share receptors with direct line-of-sight to both construction sites. As such, impacts would be less than significant in this regard.

No other projects are located within 1,000 feet of the project site. Therefore, potential cumulative construction impacts would be less than significant in this regard.

Permanent Noise Level Increase/Exceed Applicable Standards

According to General Plan Action NOI-1.4, a significant impact would occur if the proposed project: 1) causes the Ldn at noise-sensitive uses to increase by 3 dBA or more and thus, exceed the “normally acceptable” level; 2) causes the Ldn at noise-sensitive uses to increase by 5 dBA or more and remain “normally acceptable;” or 3) causes noise levels to exceed the limits in General Plan Table 9-1, Non-Transportation Noise Standards. According to General Plan Figure 9-1, Land Use Compatibility for Community Noise Environment, the “normally acceptable” threshold is 60 dBA Ldn for single-family receptors and 65 dBA Ldn for multi-family receptors.

General Plan Table 9-1 and the Municipal Code provide exterior and interior daytime and nighttime L_{eq}/L_{50} and L_{max} thresholds for non-transportation sources, including thresholds for residential receptors. Since the site is surrounded by existing light industrial and office uses, with the nearest residential uses located more than 1,000 feet north of the project site, these thresholds would not apply to the proposed project. Therefore, a significant impact would occur at the receptors surrounding the site if ambient noise levels were exceeded at the receiving property lines. The ambient thresholds for this project are summarized in Table 20, Summary of Ambient Noise Levels for Existing Receptors Surrounding the Project Site.

Table 20.
Summary of Ambient Noise Levels for Existing Receptors Surrounding the Project Site

Receptor	Range of Daytime Noise Levels (Average), dBA L_{eq}	Range of Nighttime Noise Levels (Average), dBA L_{eq}	Ldn, dBA
North Light Industrial	52 to 62 (58)	50 to 59 (54)	62
West Commercial and Light Industrial	52 to 62 (58)	50 to 59 (54)	62
East Offices	55 to 66 (61)	46 to 62 (53)	63
South Offices and Light Industrial	52 to 62 (58)	50 to 59 (54)	62
Nearest Residences	55 to 66 (61)	46 to 62 (53)	63

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Project Traffic Increase

The proposed project would generate daily trips, including 30 employee trips and 5 truck trips, with AM and PM commute hours having 6 employee trips each. These additional peak-hour trips would not result in a measurable or detectable increase in noise. Additionally, the existing uses on-site have a total daily trip count of 93 vehicles, an AM peak-hour trip count of 13 vehicles, and a PM peak-hour trip count of 3 vehicles. Overall, the project would result in a decrease of 58 daily trips, a decrease of 5 trips during the AM peak hour, and an increase of 5 trips in the PM peak hour. The project-generated vehicle trips would not result in a measurable or detectable noise level increase (0 dBA Ldn increase). Thus, the project would not result in a substantial permanent noise increase at noise-sensitive receptors in the project vicinity. Impacts would be less than significant in this regard.

Mechanical Equipment

The proposed project would include a transformer and emergency generator in the southwestern corner of the project site. Additional equipment would be located within the building; however, this equipment would be well insulated by the building and would not generate noise levels audible or measurable at the property lines.

Ground-Level Equipment

Typically, transformers up to 1,000 kilovolt-amperes (kVA) generate noise levels up to 64 dB, as measured at 1 meter (about 3 feet). Assuming the transformer runs continuously during daytime and nighttime hours, the hourly average noise levels would be 64 dBA at 3 feet, and the day-night average noise level would be 70 dBA Ldn at a distance of 3 feet.

A Kohler Power Systems 300-kilowatt (kW) generator with a sound enclosure would be installed as part of the proposed project. According to the manufacturer's specifications provided by the applicant, the generator would produce a maximum average noise level of 75 dBA at 7 meters (23 feet). While the generator operates under emergency conditions, noise levels generated by the emergency generator would be exempt from City's noise limits pursuant to Municipal Code Section 18.21.050; however, monthly testing of emergency generators, which typically occur for a period of one hour between 7:00 a.m. and 10:00 p.m., would be required to fall within the existing ambient conditions.

Table 21, Operational Noise Levels for Ground-Level Mechanical Equipment Sources, summarizes the hourly average noise levels and the day-night average noise levels for the transformer and the emergency generator propagated to the surrounding receptors. Due to the intervening buildings between the equipment and the nearest residences, a conservative 20 dBA attenuation is applied to the noise levels at these receptors. Additionally, the proposed building would provide a minimum 20 dBA attenuation for the emergency generator noise. These attenuations are applied to the noise levels in Table 21.

Operational L_{eq} due to the transformer would not exceed daytime or nighttime average ambient noise levels at any of the surrounding receptors and nearest residential land uses. However, testing of the emergency generator with a sound enclosure would potentially exceed daytime ambient noise levels at the west commercial and light industrial uses (ranging from 52 to 62 dBA L_{eq} or 62 dBA Ldn) and the south offices and light industrial uses (ranging from 52 to 62 dBA L_{eq} or 62 dBA Ldn) in accordance with the thresholds established in the City's General Plan and Municipal Code. As mentioned above, according to General Plan Action NOI-1.4, a significant impact would occur if the proposed project: 1) causes the Ldn at noise-sensitive uses to increase by 3 dBA or more and thus, exceed the "normally acceptable" level; 2) causes the Ldn at noise-sensitive uses to increase by 5 dBA or more and remain "normally acceptable;" or 3) causes noise levels to exceed the limits in General Plan Table 9-1, Non-Transportation Noise Standards. During testing days of the emergency generator, the permanent noise level increase at the west commercial and light industrial uses would be up to 3 dBA Ldn, while on typical days, when operations would include the transformer only, the permanent noise level increase would be 2 dBA Ldn. For all other existing receptors, the

noise level increase due to the transformer and emergency generator noise would not be measurable or detectable (0 dBA Ldn increase).

Table 21.
Operational Noise Levels for Ground-Level Mechanical Equipment Sources

Receptor	Transformer			Emergency Generator			Combined Ldn, dBA	Noise Level Increase, dBA Ldn
	Distance from Transformer, Feet	Leq, dBA	Ldn dBA	Distance from Emergency Generator, Feet	Leq, dBA	Ldn, dBA		
North Light Industrial	230	26	33	230	35	21	33	0
West Commercial and Light Industrial	10	54	60	30	73	59	63	2 to 3
East Offices	290	24	31	270	54	40	40	0
South Offices and Light Industrial	70	37	43	70	65	52	52	0
Nearest Residences	1,240	<20 ^a	<20 ^a	1,240	20 ^a	<20 ^a	<20	0

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

^a Conservative 20 dBA attenuation assumed for intervening buildings.

Rooftop Equipment

The proposed project would include noise-generating equipment on the roof of the building, with each piece of equipment being summarized as follows:

- Southern Corner
 - Condensing Unit (CU)-1 – 65 dBA measured at 5 feet
 - CU-2 – 54 dBA measured at 5 feet
 - CU-3 – 61 dBA measured at 5 feet
 - CU-4 – 54 dBA measured at 5 feet
 - CU-5 – 55 dBA measured at 5 feet
 - Make-Up Air Unit (MUA)-1 – 68 dBA measured at 5 feet
 - Exhaust Fan (EF)-5 – 54 dBA measured at 5 feet
 - EF-8 – 51 dBA measured at 5 feet
- Northwest Façade
 - Rooftop Unit (RTU)-1 – radiated 80 dBA measured at 5 feet
- Northern Corner
 - EF-1 – 55 dBA measured at 5 feet
 - EF-2 – 44 dBA measured at 5 feet
 - EF-12 – 52 dBA measured at 5 feet
 - MUA-2 – 69 dBA measured at 5 feet
- Northeast Façade
 - EF-3 – 50 dBA measured at 5 feet
 - EF-4 – 50 dBA measured at 5 feet
 - EF-11 – 55 dBA measured at 5 feet

- Eastern Corner
 - EF-6 – 48 dBA measured at 5 feet
 - EF-7 – 46 dBA measured at 5 feet
 - EF-9 – 51 dBA measured at 5 feet
 - EF-10 – 51 dBA measured at 5 feet

Table 22, Operational Noise Levels for Roof-Top Mechanical Equipment Sources, summarizes the distances of each of the surrounding noise-sensitive receptors from the rooftop equipment and the operational noise levels at the property lines of the surrounding receptors, with the conservative attenuation applied for each receptor. Note, an additional attenuation of 10 dBA is assumed for all rooftop sources due to the elevation of the equipment above the ground. Additional attenuation from intervening off-site buildings is not assumed. This is applied to the values in Table 21 for all ground-level receptors.

The operational L_{eq} due to rooftop equipment at the proposed building would not exceed daytime average ambient noise levels or nighttime average ambient noise levels at any of the surrounding receptors. The permanent noise level increase at the north light industrial zone would be up to 2 dBA Ldn. The permanent noise level increase at the west commercial and light industrial uses would be up to 1 dBA Ldn. For all existing noise-sensitive receptors (i.e., residences only) and commercial receptors, the noise level increase due to rooftop noise sources would not be measurable or detectable (0 dBA Ldn increase).

Table 22.
Operational Noise Levels for Roof-Top Mechanical Equipment Sources

Receptor	Southern Corner		Northwest Façade		Northern Corner		Northeast Façade		Eastern Corner		Combined Leq, dBA	Combined Ldn, dBA	Noise Level Increase, dBA Ldn
	Distance from Southern Corner, Feet	Leq, dBA	Distance from Northwestern Façade, Feet	Leq, dBA	Distance from Northern Corner, Feet	Leq, dBA	Distance from Northeast Façade, Feet	Leq, dBA	Distance from Eastern Corner, Feet	Leq, dBA			
North Light Industrial	190	29	38	52	35	42	105	21	165	< 20	53	59	2
West Commercial and Light Industrial	35	41	72	47	210	27	215	< 20	220	< 20	48	54	1
East Offices	275	23	225	37	90	35	85	23	90	23	39	46	0
South Offices and Light Industrial	120	30	282	35	270	25	205	< 20	150	< 20	37	43	0
Nearest Residences	1,200	<20	1,210	<20	1,205	<20	1,205	< 20	1,210	< 20	<20	29	0

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Auto Repair Shop

The primary sources of noise generated on site would be vehicle maintenance activities, including the fueling and wash facilities.

Vehicle Maintenance Activities

Predominant noise sources at the maintenance facility would include low-level music (45 dBA L_{eq} at 70 feet outside the bay), a dual-action sander (79 dBA L_{eq} at 10 feet), and the use of an impact wrench when changing a tire (79 dBA L_{eq} at 10 feet). These tools would be used in the center of the building in the lift bays, approximately 105 feet from the open bay doors. An impact wrench is typically used for 1 to 5 minutes per hour (L_{02} is the applicable threshold), and a dual-action sander is used for approximately 15 to 30 minutes per hour (L_{25} is the applicable threshold).

Vehicle Washing Activities

The building would include two (2) wash bays on the northeast façade. The building would also include roll-up doors that would be open during business hours.

The proposed wash bays would house vacuum equipment and wash equipment. Vacuum equipment would likely be canister vacuums similar to the type seen at car washes. The vacuums would be located within the wash facility. A standard car vacuum system without special silencers generates a noise level of about 67 dBA L_{eq} at a distance of 20 feet.

Noise generated in the wash bay would be mainly due to the sounds produced when the high-pressure water from the wash jets impacts the exterior of the vehicle. The wash equipment may be housed in an interior equipment room located between the two wash bays. The main sources of operational noise associated with the wash facility would come from the water pump and spray noise during the wash cycle inside the wash facility. The specific wash equipment has not been selected for the project at this time; however, previous similar analyses indicate that the touchless washer can produce sound levels of approximately 74 dBA L_{eq} at a distance of 10 feet.

Table 23, Operational Noise Levels for Auto Repair Shop Noise, summarizes the auto repair shop noise levels propagated to the property line of the surrounding land uses.

Operational L_{eq} noise levels due to the auto repair shop would potentially exceed daytime average ambient noise levels at the office use to the east. The permanent noise level increase at the office use to the east would be 1 dBA Ldn. For all other receptors, the noise level increase due to auto repair shop noise sources would not be measurable or detectable (0 dBA Ldn increase).

Table 23.
Operational Noise Levels for Auto Repair Shop Noise

Receptor	Maintenance Bays		Wash Bays		Combined L_{eq} , dBA	Combined Ldn, dBA	Noise Level Increase, dBA Ldn
	Distance from Maintenance Bays, Feet	L_{eq} , dBA	Distance from Wash Bays, Feet	L_{eq} , dBA			
North Light Industrial	105	42 ^a	100	50 ^b	51	47	0
West Commercial and Light Industrial	40	50 ^a	135	38 ^a	50	47	0
East Offices	180	47 ^b	86	62	62	58	1
South Offices and Light Industrial	195	36 ^a	200	44 ^b	45	41	0
Nearest Residences	1,305	<20 ^a	1,200	<20 ^a	22	<20	0

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Notes:

^a Conservative 20 dBA attenuation assumed for project building.

^b Conservative 10 dBA attenuation assumed for partial shielding by project building.

Total Combined Project-Generated Noise

Operational noise levels produced by the proposed project combined (i.e., traffic, mechanical equipment, and auto repair shop) would result in an increase of less than 3 dBA Ldn at all existing noise-sensitive receptors (i.e., residences only) in the project vicinity.

Operational noise levels due to mechanical equipment located on the rooftop would potentially exceed nighttime average ambient L_{eq} noise levels at the existing warehouse/commercial uses adjoining the site and at the future office/research and development uses located southeast of the site. Additionally, operational noise levels produced by the project combined noise sources during testing days of the emergency generator, the permanent noise level increase at the west commercial and light industrial uses would be up to 4 dBA Ldn, while on typical days, when operations would include the transformer only, the permanent noise level increase would be 3 dBA Ldn.

The permanent noise level increase due to the project's combined noise levels at the north light industrial would be up to 2 dBA Ldn. The permanent noise level increase due to the project's combined noise levels at the east offices, south offices, and light industrial uses would be up to 1 dBA Ldn. However, thresholds established in the City's General Plan and Municipal Code would not be exceeded by operations at the project site. Therefore, impacts would be less than significant in this regard.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation Incorporated: The construction of the project may generate vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Construction activities would include grading, foundation work, paving, and new building framing and finishing. According to the equipment list provided, impact or vibratory pile driving activities, which can cause excessive vibration, are not expected for the proposed project.

For structural damage, Caltrans recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.25 in/sec PPV for historic buildings. No known historic buildings adjoin the project site. Therefore, conservatively, groundborne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in a significant vibration impact.

Table 24, Vibration Source Levels for Construction Equipment, presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Project construction activities, such as drilling, the use of jackhammers, rock drills, and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Jackhammers typically generate vibration levels of 0.035 in/sec PPV, and drilling typically generates vibration levels of 0.09 in/sec PPV at a distance of 25 feet.

Vibration levels would vary depending on soil conditions, construction methods, and equipment used. Table 23 also summarizes the distances to the 0.3 in/sec PPV threshold for all conventional buildings.

Table 24.
Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 Feet (in/sec)	Minimum Distance to Meet 0.3 in/sec PPV (Feet)
Clam Shovel drop		0.202	18
Hydro mill (slurry wall)	In soil	0.008	1
	In rock	0.017	2
Vibratory roller		0.210	19
Hoe ram		0.089	9
Large bulldozer		0.089	9
Caisson drilling		0.089	9
Loaded trucks		0.076	8
Jackhammer		0.035	4
Small bulldozer		0.003	<1

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Vibration levels are highest close to the source and then attenuate with increasing distance at the rate $(D_{ref}/D)^{1.1}$, where D is the distance from the source in feet and D_{ref} is the reference distance of 25 feet. While construction noise

levels increase based on the cumulative equipment in use simultaneously, construction vibration levels would be dependent on the location of individual pieces of equipment. That is, equipment scattered throughout the site would not generate a collective vibration level, but a vibratory roller, for instance, operating near the project site boundary would generate the worst-case vibration levels for the receptor sharing that property line. Further, construction vibration impacts are assessed based on damage to buildings on receiving land uses, not receptors at the nearest property lines. Therefore, the distances used to propagate construction vibration levels are measured from the nearest project site boundary and propagated to the nearest receiving off-site structure, unlike construction noise.

Existing light industrial and office buildings to the north, east, and south of the project site range from 40 to 75 feet from the nearest boundary of the project site. At these distances, vibration levels would be below 0.13 in/sec PPV. Additionally, the nearest residences are more than 1,000 feet from the project site and would not be exposed to perceptible construction vibration levels.

The nearest commercial building to the west is located within 5 feet of the shared property line. Table 25, Construction Vibration Levels at the Nearest Surrounding Building Facades Adjoining the Project Site, summarizes the vibration levels expected at these buildings, assuming each piece of equipment operates along the shared property lines.

Table 25.

Construction Vibration Levels at the Nearest Surrounding Building Facades Adjoining the Project Site

Phase	Equipment	PPV at 25 Feet in/sec	Vibration at West Commercial Building (5 Feet)
Demolition	Concrete/Industrial Saw	0.035	0.206
	Rubber-Tired Dozer	0.089	0.523
	Tractor/Loader/Backhoe	0.003	0.018
Site Preparation	Grader	0.089	0.523
	Rubber-Tired Dozer	0.089	0.523
	Tractor/Loader/Backhoe	0.003	0.018
Grading/Excavation	Grader	0.089	0.523
	Rubber-Tired Dozer	0.089	0.523
	Tractor/Loader/Backhoe	0.003	0.018
Trenching/Foundation	Tractor/Loader/Backhoe	0.003	0.018
	Excavator	0.089	0.523
Building – Exterior	Crane	0.003	0.018
	Forklift	0.003	0.018
	Generator Set	0.003	0.018
	Tractor/Loader/Backhoe	0.003	0.018
	Welder	0.003	0.018
Building – Interior/Architectural Coating	Air Compressor	0.003	0.018
Paving	Cement and Mortar Mixer	0.003	0.018
	Paver	0.003	0.018
	Paving Equipment	0.003	0.018
	Roller	0.21	1.233
	Tractor/Loader/Backhoe	0.003	0.018

Source: 930 Commercial Street Auto Repair Facility Noise and Vibration Assessment, San Carlos, California, prepared by Illingworth & Rodkin, Inc., dated October 6, 2025; refer to Appendix F, Noise Study.

Project construction activities would potentially generate vibration levels up to 1.2 in/sec PPV at the existing commercial building adjoining the project site. A study completed by the United States Bureau of Mines (USBM) analyzed the effects of blast-induced vibration on buildings in USBM RI 8507. The findings of the USBM study have been applied to buildings affected by construction-generated vibrations. As reported in USBM RI 8507 and reproduced by Dowding in Construction Vibrations, Noise Study Figure 2, Probability of Cracking and Fatigue from Repetitive Loading, presents the damage probability, in terms of “threshold damage” (described above as cosmetic damage), “minor damage,” and “major damage,” at varying vibration levels. Threshold damage, or cosmetic damage, would entail hairline cracking in plaster, the opening of old cracks, the loosening of paint or the dislodging of loose objects. Minor damage would include hairline cracking in masonry or the loosening of plaster, and major structural damage would include wide cracking or shifting of foundation or bearing walls.

As shown in Noise Study Figure 2, maximum vibration levels of 0.5 in/sec PPV or lower would result in about 5 percent chance of cosmetic damage, while maximum vibration levels of 1.2 in/sec PPV would result in about 20 percent chance of cosmetic damage. No minor or major damage would be expected at the buildings immediately adjoining the project site.

Neither cosmetic, minor, nor major damage would occur at historical or conventional buildings located 20 feet or more from the project site. At these locations, and in other surrounding areas where vibration would not be expected to cause cosmetic damage, vibration levels may still be perceptible. However, as with any type of construction, this would be anticipated and would not be considered significant, given the intermittent and short duration of the phases that have the highest potential of producing vibration (use of jackhammers and other high-power tools). By use of administrative controls, such as notifying neighbors of scheduled construction activities and scheduling construction activities with the highest potential to produce perceptible vibration during hours with the least potential to affect nearby businesses, perceptible vibration can be kept to a minimum.

In summary, the construction of the project would potentially generate vibration levels exceeding the 0.3 in/sec PPV threshold at conventional properties adjoining the project site, which could result in cosmetic damage to these adjacent buildings. As such, the proposed project would implement MM NOI-1, which would reduce vibration impacts from construction activities. Specifically, MM NOI-1 would require operating equipment to be placed on the site as far as possible from vibration sensitive receptors, use smaller equipment to minimize vibration levels at the property line, avoid using excavators, dozers, and graders near sensitive areas within 10 feet of the western property line, and avoiding using vibratory rollers within 20 feet of the western property line, among others. With implementation of MM NOI-1, the proposed project would reduce impacts to less-than-significant levels in this regard.

- 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?***

Less Than Significant Impact: The San Francisco International Airport is a public-use airport located more than nine miles northwest of the project site. According to the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, the project site lies well outside the 65 dBA CNEL/Ldn noise contour, and the required safe and compatible threshold for exterior noise levels would be at or below 65 dBA CNEL for aircraft. As shown in Noise Study Figure 3, 2035 Noise Contours for San Carlos Airport, the project site lies well outside the 60 dBA CNEL noise contour for the San Carlos Airport, which is less than 0.5 miles east of the project site. Therefore, the proposed project would be compatible with the exterior noise standards for aircraft noise.

Assuming standard construction materials, future interior noise levels resulting from aircraft would be below 50 dBA L_{eq} (1-hr). Therefore, future interior noise at the proposed building would be compatible with aircraft noise. Impacts would be less than significant in this regard.

MITIGATION MEASURES

MM-NOI-1 Construction-Related Vibration Noise Reduction

To reduce vibration levels during construction activities, prior to the issuance of building permits, the applicant shall demonstrate, to the satisfaction of the City of San Carlos Current Planning Division, that the project complies with the following:

- Operating equipment on the project site shall be located as far as possible from vibration-sensitive receptors.
- The use of smaller equipment shall be used to minimize vibration levels to below 0.3 in/sec Peak Particle Velocity (PPV) at the property lines. For example, a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, may be used when compacting materials within 20 feet of the adjacent conventional buildings.
- Construction activities shall avoid using excavators, dozers, and graders near sensitive areas within 10 feet of the western property line and avoid using vibratory rollers within 20 feet of the western property line.
- Demolition methods shall avoid impact tools.
- Alternative construction methods shall be identified to reduce vibration levels below the vibration limits threshold.
- Construction activities shall avoid dropping heavy equipment. Alternative methods for breaking up existing pavement shall be identified, such as a pavement grinder, instead of dropping heavy objects, within 20 feet of the adjacent conventional buildings.
- A person responsible for registering and investigating claims of excessive vibration shall be designated. The contact information (e.g., phone number) of such person shall be clearly posted on the project site during construction activities.

3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – 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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Regulatory Setting

Regulations at the federal, State, or local levels are not applicable to the proposed project related to population and housing.

Environmental Setting

The project site is currently developed with two existing single-story industrial buildings, and no housing exists on-site.

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

Less Than Significant Impact: A project could induce population growth in an area either directly, through the development of new residences or businesses, or indirectly, through the extension of roads or other infrastructure. The proposed project involves the removal of the two existing single-story industrial buildings and asphalt parking lots, in order to construct a new one-story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements. Thus, the project would directly induce population growth in the City of San Carlos (City).

The proposed project would result in approximately eight (8) employees, with a maximum of four part-time mechanics on-site at any one time. As such, the proposed project could create new jobs in the City, which may result in an increased demand for housing. However, due to the locally serving nature and scale of the new facility, the new jobs created on-site would result in a nominal direct impact on population growth and housing demand, as these jobs are anticipated to be filled mostly by local residents of the City. Thus, the proposed project would not induce substantial unplanned population growth within the City, either directly or indirectly. Impacts in this regard would be less than significant.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

No Impact: The project site is currently developed with two existing single-story industrial buildings. No housing exists on-site. Therefore, project implementation would not displace any existing people or housing. No impact would result in this regard.

MITIGATION MEASURES

Project implementation would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.

3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES – 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:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

The information presented in this analysis is supplemented with public services correspondences provided by the various applicable public services agencies and departments; refer to Appendix G, Public Services Correspondences.

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to public services include:

- Government Code Section 65996
- California Fire Code
- San Carlos Municipal Code (Municipal Code)

Environmental Setting

Fire Protection

According to the General Plan EIR, fire protection services in the City of San Carlos (City) are provided under contract with the Redwood City and San Carlos Fire Departments (Fire Department), which provides fire protection, hazardous materials response, disaster preparedness, and emergency medical response. The Fire Department includes seven fire stations housing seven engines, one truck, one battalion chief and over 90 staff members including firefighters, firefighter/paramedics, captains, battalion chiefs, fire prevention staff, training staff, and administrative staff. Eight firefighter/paramedics are on duty at one time (one on each engine and one on the tiller-truck), with a total of 27 firefighter/paramedics working for the Fire Department; all paramedics are cross trained as firefighters.

According to the Fire Department's Public Services Correspondence, the closest fire station is Fire Station 13, which is located approximately 0.55 miles northwest of the project site at 525 Laurel Street. Fire Station 13 is staffed with one fire engine and three firefighters at all times.

Police Protection

According to the General Plan EIR, police protection services in the City are provided under contract with the San Mateo County Sheriff's Office (SMCSO). SMCSO includes over 800 sworn and civilian personnel who provide various police protection services to the County of San Mateo, including the San Carlos Bureau, which services the City. The San Carlos Bureau consists of 30 SMCSO employees and four San Mateo Communications Office communications

officers. More specifically, the 30 SMCSO employees include one technician, one management analyst, ten deputy sheriffs, two K9 deputies, two motor deputies, five sergeants, one captain, and eight community services officer.

According to the SMCSO's Public Services Correspondence, the closest substation is located approximately 0.55 miles southwest of the project site at 600 Elm Street. The patrol beat corresponding to the project site is staffed with two SMCSO deputies; one in a patrol vehicle and one on a motorcycle.

Schools

According to the General Plan EIR, the City is served by three public elementary school districts: San Carlos School District (SCSD), Belmont-Redwood Shores School District, and Redwood City School District. Sequoia Union High School District (SUHSD) serves all public high school students in the City. As depicted in General Plan EIR Figure 4.13-3, Elementary School District Boundaries, and General Plan EIR Table 4.13-1, School Districts and Schools Serving Residents Within the Project Area, the project site is served by SCSD and SUHSD. As of 2022, SCSD has a total district enrollment of 3,003 students and SUHSD has a total district enrollment of 10,032 students. The closest school is Arroyo Elementary School located approximately 0.51 miles southwest of the project site at 1710 Arroyo Avenue.

Parks

According to the General Plan EIR, park and recreational services in the City are provided by the City's Parks and Recreation Department. According to the City's Parks and Recreation Department's Public Services Correspondence, the City's Parks and Recreation Department owns and operates approximately 186.4 acres of parks and open spaces in the City; refer to General Plan EIR Figure 4.13-4, Existing Parks and Recreational Facilities. The closest park or recreational facility is Laureola Park located approximately 0.81 miles northwest of the project site at 503 Old Country Road.

Other Public Facilities

According to the General Plan EIR, library services in the City are provided by the San Mateo County Library System's San Carlos Branch (SMCLS). In addition to book circulation, the SMCLS offers child, adult and family programming, as well as computer workstations that are available for public use. SMCLS also features study rooms, virtual meeting spaces, and various types of equipment available for reservation. The SMCLS is located approximately 0.54 miles southwest of the project site at 610 Elm Street.

- a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

Less Than Significant Impact:

Construction

The project would result in the construction of a new automobile repair facility on a site that is currently developed with two existing industrial buildings. During construction, any lane closures would be required to comply with applicable regulations to ensure adequate fire access. Additionally, construction materials would be secured to minimize fire hazards. As such, impacts on fire protection services would be less than significant.

Operation

As discussed in Section 3.14, Population and Housing, implementation of the proposed project is not anticipated to result in a population increase compared to existing conditions due to the non-residential nature of the project.

Further, the project would not result in a change in land use, compared to existing conditions. As a result, project implementation would not require the construction of new or physically altered fire facilities and is not anticipated to result in an increase in service calls. Nonetheless, the project would be subject to Municipal Code Chapter 15.05, Technical Building Codes, which adopts by reference the California Fire Code, which includes site access requirements and fire safety precautions.

As currently designed, the proposed project would include features such as fire-resistant construction materials, fire alarm/sprinkler systems, hydrants, and adequate fire access for emergency vehicles. The Fire Department would provide plan checks and inspections to verify the project is designed pursuant to the California Fire Code. Upon approval of the plan check by the Fire Department, impacts concerning fire protection services would be less than significant.

Police protection?

Less Than Significant Impact:

Construction

Construction activities associated with the proposed project may create a temporary increase in demand for police protection services at the project site, such as potential security needs for staging areas on-site. However, construction activities would be subject to compliance with Municipal Code Chapter 15.04, Technical Building Codes, which adopts by reference the California Building Code. California Building Code Chapter 33, Safeguards During Construction, includes emergency access requirements that would minimize site safety hazards and potential construction-related impacts to police services. Compliance with existing regulations would ensure impacts on police services during construction are less than significant.

Operation

As discussed above, the SMCSO provides law enforcement services to the City, including the project site. Due to the non-residential nature of the project, the operation of the proposed project would not directly or indirectly result in a permanent population growth in the City that would impact existing service ratios. Further, the project would replace two existing industrial buildings with one new automobile repair facility and, as such, would not result in a change in land use at the project site. Therefore, project implementation would not require the construction of new or physically altered police facilities and is not anticipated to result in an increase in service calls. Impacts would be less than significant in this regard.

Schools?

Less Than Significant Impact:

Construction

The construction of the proposed project would be short-term and any environmental impacts that would impact schools would cease upon construction completion. Additionally, the construction of the proposed project would not include any lane closures or any design features that would disrupt the ability of nearby schools to serve the community. As such, impacts on school services would be less than significant in this regard.

Operation

Given the non-residential nature of the proposed development, the project would not directly increase the population of the City and would not directly generate additional students within the project area. Further, as the project would replace two existing industrial buildings with one new automobile repair facility, proposed new employees at the project site are not anticipated to indirectly generate a significant number of increased students in

the City, if any. Nonetheless, pursuant to Government Code Section 65996, the project's demands on school services would be fully offset through collection of school fees imposed through the Education Code. As such, impacts would be less than significant in this regard.

Parks?

Less Than Significant Impact:

Construction

The project proposes to demolish the two existing single-story industrial buildings and asphalt parking lots, in order to construct a new one-story, 48,370-square-foot automobile repair facility with associated surface parking and landscaping improvements. The construction of the proposed project would not result in any design features or lane closures that would impact nearby parks. As such, impacts would be less than significant in this regard.

Operation

As discussed in Response 3.15(a)(iii), the project is not anticipated to substantially increase the population in the project area. As such, the project would not result in a substantial increase in the demand for use of parkland. As such, impacts would be less than significant in this regard.

Other public facilities?

Less Than Significant Impact:

Construction

The construction of the proposed project would not result in any design features or lanes that would impact other public facilities such as libraries. As such, impacts would be less than significant in this regard.

Operation

Implementation of the proposed project would not result in a significant increase in the use of the SMCLS as the project would result in a nominal population increase, if any. Thus, impacts would be less than significant in this regard.

MITIGATION MEASURES

Project implementation would not result in any significant impacts related to public services; therefore, no mitigation measures are required.

3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Regulatory Setting

Regulations at the local level applicable to the proposed project related to recreation include the 2045 General Plan Reset Environmental Impact Report (General Plan EIR).

Environmental Setting

According to the General Plan EIR, the City of San Carlos (City) contains approximately 62.5 acres of traditional developed parkland within City limits. Moreover, the City's Parks and Recreation Department manages 16 parks, including three community parks, four neighborhood parks, five mini parks, two open space parks, and two dog parks. Eaton Park and Big Canyon Park also offer 73 acres of natural open space within the City. Overall, these parks and open space areas provide passive recreation facilities, including trails, views, natural vegetation and wildlife and environmental education facilities.

The City's Parks and Recreation Department also organizes and operates a variety of programs for youth and adults. These programs include the San Carlos Youth Center at 1001 Chestnut Street and the Adult Community Center at 601 Chestnut Street.

The closest park or recreational facility to the project site is Frank D. Harrington Park, located approximately 0.32 miles to the southwest of the project site.

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

Less Than Significant Impact: Refer to Response 3.15(a)(iv). The project would not result in a substantial population increase and, as such, would not result in an increase in the use of existing neighborhood and regional parks or other recreational facilities, whereas such use would result in the physical deterioration of nearby parks. Impacts in this regard would be less than significant.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

No Impact: Refer to Response 3.15(a)(iv). The project does not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in significant impacts related to recreation; therefore, no mitigation measures are required.

3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION – Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☒	☐	☐

The information presented in this analysis is primarily based on the Focused Local Transportation Analysis for a Vehicle Repair Facility at 930 Commercial Street (Focused LTA), prepared by W-Trans, dated October 8, 2025; refer to Appendix H, Focused LTA.

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to transportation include the California Fire Code and City of San Carlos Transportation Study Guidelines (Transportation Guidelines).

Environmental Setting

No transit or bicycle facilities are currently located along the project frontage or in the immediate vicinity of the project area and frontage along Commercial Street. However, pedestrian facilities are located along Commercial Street.

- a) *Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Less Than Significant Impact:

Roadway Facilities

Refer to Response 3.17(b) regarding project impacts on roadway facilities.

Transit, Bicycle, and Pedestrian Facilities

Implementation of the proposed project would not impair existing pedestrian sidewalks along Commercial Street. Rather, the infill industrial development would encourage the use of existing pedestrian facilities in the project area. The project would also provide four short-term bicycle parking spaces near the northeastern corner of the site to encourage additional multimodal transportation. It should be noted that a proposed 8-foot-wide public access easement along the northern site boundary would be dedicated for future use as an 8-foot-wide pedestrian pathway. The proposed sidewalk would connect to the future 8-foot-wide pedestrian pathway, which would become a segment of the future discovery path, anticipated as part of the East Side Innovation District Vision Plan (Vision Plan). The future discovery path would eventually connect with the existing pedestrian network, including the Industrial Road

pedestrian facilities. Furthermore, the future discovery path would eventually connect to the proposed Commercial Street pedestrian facilities associated with the approved Alexandria Center for Life Science Project (State Clearinghouse Number 2021060668), anticipated as part of the Vision Plan. As such, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system. Impacts would be less than significant in this regard.

b) *Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

Less Than Significant Impact: The City adopted thresholds of significance and screening criteria for vehicle miles traveled (VMT) evaluation on November 2024.²⁹ The thresholds of significance and screening criteria were contained in the Transportation Guidelines, dated November 2024. The methodology in the Transportation Guidelines are consistent with Governor's Office of Land Use and Climate Innovation's (LCI), formerly the Governor's Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory), dated December 2018, and the Institute of Transportation Engineers' (ITE) in Trip Generation Manual, 12th edition, 2025.

According to the Transportation Guidelines, the amount of detail required in a transportation study is generally based on the project's expected level of daily and/or peak hour vehicle trip generation. Projects with fewer than 100 daily trips would typically use non-model VMT analysis methods and would require a local transportation analysis (LTA or TA). Projects generating more than 100 daily trips will typically require a detailed VMT assessment using a travel model and a TA report. As part of the screening analysis, there are three (3) screening steps that a project performs to determine if it will be required to conduct any further VMT analysis. Meeting at least one of the three screening steps would generally screen a project out of VMT analysis (except where explicitly stated otherwise in the Transportation Guidelines) based on a presumption that its VMT effects would be less than significant. The following tiered trip generation screening criteria is utilized by the City:

- **Tier 1: Less than 100 daily trips:** The transportation study shall focus on site plan review and assessment of site integration within the existing transportation system. For CEQA screening, a project generating less than 100 daily trips may only require a VMT analysis to show the project generates less than 836 daily VMT (the threshold for a small project). Typical projects that would fall under the 100 daily trip thresholds would be approximately 10 single-family units, 15 multi-family units, office developments of up to 10,000 square feet, and retail uses up to 3,000 square feet. Projects of this size will require an LTA, at the discretion of the City. However, if the project is controversial or has unusual characteristics that could lead to unusually long trip lengths, staff may request a more comprehensive TA.
- **Tier 2: Between 100 and 1,000 daily trips and less than 100 peak hour trips:** The transportation study shall include site plan review, site access assessment for all travel modes, and may include off-site intersection evaluation including level of service, vehicle queues, signal warrants and collision assessment for approximately two to four intersections near the project site. The 1,000 daily trip threshold equates to approximately 100 peak hour trips; prototypical examples include multi-family home developments up to 165 units, office developments up to 100,000 square-feet, or retail uses up to 25,000 square feet (not accounting for pass-by trips). A project generating more than 100 daily trips and requires a General Plan Amendment will need to conduct a detailed VMT assessment to determine a project's effect on the environment under CEQA and would be required to prepare a TA, which is a more comprehensive transportation study.
- **Tier 3: Greater than 1,000 daily trips or greater than 100 peak hour trips:** The transportation study should include the elements discussed above, as well as additional intersection evaluation based on the expected

²⁹ City of San Carlos, City of San Carlos Transportation Study Guidelines, https://cms3.revize.com/revize/sancarlos/20241112_San_Carlos_Transportation_Study_Guidelines_Final_Signed.pdf, accessed October 13, 2025.

geographic influence of project trips. In addition, the study should discuss cumulative / long-term effects, and incorporate changes based on reasonably expected land use and transportation projects. A project generating more than 1,000 daily trips and requires a General Plan amendment will need to conduct a detailed VMT assessment to determine a project's effect on the environment under CEQA and would be required to prepare a TA, which is a more comprehensive transportation study.

As detailed in Focused LTA Table 1, Trip Generation Summary, the proposed project would be expected to generate 21 new daily trips, including two trips during the AM peak hour and two trips during the PM peak hour. Therefore, based on the first screening criteria, Tier 1: Less than 100 daily trips, the project would be presumed to have a less than significant VMT impact based on the screening criteria listed above. Impacts would be less than significant in this regard.

c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less Than Significant Impact: The project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment). Existing vehicular access to the site is provided via two driveways along Commercial Street. The project proposed to remove the existing driveways and widen and reconstruct two new driveways in-place. The two new driveways would be designed to meet all applicable driveway design standards and emergency access standards required by the City's Public Works Department and the Redwood City and San Carlos Fire Departments (Fire Department). The Fire Department would provide plan checks and inspections to verify the project is designed pursuant to the California Fire Code and no hazards due to geometric design features or incompatible uses occur in the project area. Moreover, as part of the Fire Department's Public Services Correspondence, the Fire Department did not note any specific hazards due to geometric design features or incompatible uses from the approved Alexandria Center for Life Science Project, anticipated as part of the Vision Plan. As such, following compliance with existing State and local regulations, the project would not increase hazards due to geometric design features or incompatible uses and impacts would be less than significant in this regard.

d) *Would the project result in inadequate emergency access?*

Less Than Significant Impact With Mitigation Incorporated: As discussed in Response 3.17(c), the project site is currently served by two full access driveways on Commercial Street. The proposed project would not change the orientation or location of these existing driveways; however, both driveways would be widened and reconstructed in-place. Specifically, the driveways would be widened to accommodate emergency response vehicles. Additionally, the proposed project would include improvements such as landscaping and pedestrian walkways. Although construction activities would temporarily impact adjacent roadway right-of-way (e.g., through partial lane closures), the proposed project would include MM-TRA-1 which requires a Transportation Management Plan (TMP) to include potential measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flag person to direct traffic during heavy equipment use, among others. The TMP would ensure emergency access is maintained during short-term construction activities. Following implementation of MM-TRA-1, impacts would be reduced to less than significant levels.

MITIGATION MEASURES

MM-TRA-1 Traffic Management Plan

Prior to the initiation of construction, the project applicant shall prepare a Traffic Management Plan (TMP) for review and approval by the City of San Carlos Traffic Engineer or his/her designee. The TMP shall include measures such as construction signage, limitations on timing for lane closures to avoid peak hours, temporary striping plans, and the need for a construction flag person to direct

traffic during heavy equipment use. The TMP shall specify that one direction of travel in each direction must always be maintained for the surrounding roadways throughout project construction. The TMP shall be incorporated into project specifications for verification prior to final plan approval.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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), or	☐	☐	☐	☒
b) 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.	☐	☐	☐	☒

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to tribal cultural resources include:

- Assembly Bill 52 (AB 52)
- 2045 General Plan Reset Environmental Impact Report (General Plan EIR)

Environmental Setting

According to the General Plan EIR, the first known human inhabitants of the San Carlos area were the Ohlone, who were also known as the Costanoans. The Ohlones were hunters and gatherers, living in “tribelets” – small independent groups of usually related families occupying a specific territory and speaking the same language or dialect. Historians believe that two sub-tribes existed in and around San Carlos, the Salson to the north of Belmont Creek and Lhamshin around the greater San Carlos area. Spanish settlement of the area, beginning in 1769, led to the dispersal of the tribes to the Spanish missions and eventually the disappearance of the Ohlone as a cultural group.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) *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)?***

No Impact: As detailed in Response 3.5(a), no historic resources listed or eligible for listing in a State or local register of historic resources are located on the project site. Thus, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

- b) *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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.***

No Impact: In compliance with AB 52, the City distributed letters on September 4, 2025 to California Native American tribes, notifying them of the opportunity to consult with the City regarding the proposed project. The tribes were identified based on the list provided by the Native American Heritage Commission (NAHC) or were tribes that had previously requested to be notified of future projects proposed by the City. The tribes had 30 days to respond to the City's request for consultation pursuant to AB 52.

The City received inquiries from the Indian Canyon Band of Costanoan Ohlone People on September 18, 2025, and the Muwekma Ohlone Tribe on September 22, 2025. The City provided written responses via email to each individual tribe on September 26, 2025, and October 8, 2025, requesting if formal consultation was being requested. However, no further communications was received from either of the tribes within the 30-day response period or at the time of preparation of this Initial Study. As such, the consultation efforts pursuant to AB 52 concluded. No potential impacts would occur to known tribal cultural resources in this regard.

MITIGATION MEASURES

Project implementation would not result in significant impacts related to tribal cultural resources; therefore, no mitigation measures are required.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Regulatory Setting

Regulations at the State and local levels applicable to the proposed project related to utilities and service systems include:

- California Integrated Waste Management Act of 1989
- 2022 Green Building Code
- San Carlos Municipal Code (Municipal Code)

Environmental Setting

Water

The project site is served by the California Water Service (Cal Water).

Wastewater Treatment

The City of San Carlos (City) provides wastewater collection services, and wastewater flows to a pump station operated by Silicon Valley Clean Water (SVCW), which is then pumped to the SVCW Treatment Plant in Redwood Shores of Redwood City.

Stormwater

Stormwater is managed by the City under the San Mateo Water Pollution Prevention Program.

Dry Utilities

The City contracts with Recology for its refuse and recycling. Pacific Gas and Electric (PG&E) would provide electricity services to the site. It should be noted that the proposed project would not utilize natural gas.

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Less Than Significant Impact:

Water

The project site is served by Cal Water. The project would construct private water lines and would install a new service line to connect to existing Cal Water facilities in Commercial Street. Payment of standard Cal Water connection fees and ongoing user fees would ensure the project's impacts on existing water facilities are adequately offset. Thus, it is not anticipated that project implementation would require construction of new or the expansion of existing water facilities. Impacts would be less than significant in this regard.

Wastewater Treatment

The City's Public Works Department maintains and operates the City's sewer system network and the SVCW provides wastewater treatment services. Sewer collection pipelines are proposed on-site to connect to existing sewer pipelines in Commercial Street. Wastewater generated in the City is treated by the SVCW Treatment Plant in the Redwood City. The SVCW Treatment Plant has a capacity of 29 million gallons per day (mgd).

As an industrial development, the project is anticipated to generate additional wastewater beyond existing conditions; however, the project is consistent with the site's land use designation and zoning and thus, was contemplated as part of the build out within San Carlos and within the service area of SVCW. Additionally, the proposed project would be required to pay sewer connection fees and ongoing user fees. Municipal Code Chapter 13.04, Sewer Connections, also imposes a development impact fee on all new development in the City to fund a project's fair share of costs to upgrade the City's sewer system. Payment of development impact fee, standard sewer connection fees, and ongoing user fees would ensure the project's impacts on existing wastewater facilities are adequately offset. As such, it is not anticipated that project implementation would require construction of new or the expansion of existing wastewater facilities. Less than significant impacts would occur in this regard.

Stormwater

As detailed in Section 3.10, Hydrology and Water Quality, the project proposes to install low impact development (LID) bioretention planters within the project site which would collect stormwater runoff, allow infiltration into the soil, and discharge remaining runoff into curb drains along the adjacent sidewalks. Upon project completion, stormwater runoff volumes and impervious surfaces on-site would be reduced compared to existing conditions. As such, impacts would be less than significant in this regard.

Dry Utilities

Electricity services would be provided by PG&E. AT&T would provide telecommunication services to the site. The project would result in the construction of new private on-site dry utilities associated with electricity and telecommunications; however, payment of standard utility connection fees and ongoing user fees would ensure impacts to these utility services are adequately offset.

The project's potential environmental effects for construction are analyzed throughout this Initial Study. Construction of the project's dry utilities would be subject to compliance with all applicable federal, State, and local laws, ordinances, and regulations, as well as the specific mitigation measures throughout this Initial Study. Compliance with the relevant laws, ordinances, and regulations would ensure the project's construction-related environmental impacts are less than significant.

b) *Would the project 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: As stated in Response 3.19(a), the project site is served by Cal Water. According to Cal Water's 2020 Urban Water Management Plan (UWMP), Cal Water depends exclusively on treated water purchased from the City of San Francisco and County of San Francisco for its existing and planned sources of water supply. According to the UWMP, Cal Water would be capable of providing adequate water supply to its service area under a normal supply and demand scenario through 2045. However, Cal Water would not be capable of providing adequate water supply to its service area under a single dry-year supply and demand scenario, and multiple dry-year supply and demand scenarios through 2045. Although significant uncertainty remains regarding future supply availability for single dry-year and multiple dry-year supply and demand scenarios, Cal Water, the San Francisco Public Utilities Commission (SFPUC), and the Bay Area Water Supply and Conservation Agency (BAWSCA) have developed strategies and actions to address the projected dry year supply shortfalls.

Moreover, the UWMP water supply predictions are based on existing General Plan designations and account for increased demand as growth within the City occurs. Based on the General Plan, the project site is designated Planned Industrial and the proposed industrial development is an allowed use under the Planned Industrial designation; refer to Section 3.11, Land Use and Planning. Thus, buildout of the site as proposed was contemplated in the UWMP for the normal supply and demand scenario through 2045. With conformance with the Cal Water, SFPUC, and BAWSCA strategies and actions to address the projected dry year supply shortfalls, the proposed project's water demands would be adequately accommodated during the single dry-year and multiple dry-year supply and demand scenarios. Impacts would be less than significant in this regard.

c) *Would the project 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: As stated in Response 3.19(a), the proposed project would result in the generation of additional wastewater above existing conditions. However, there is capacity for wastewater treatment at SVCW's wastewater treatment plant to serve the project's anticipated demand in addition to existing commitments. Additionally, as the project is consistent with the site's land use designation and zoning, payment of standard sewer connection fees and ongoing user fees would ensure that sufficient capacity is available. As such, the project's potential impacts on the wastewater treatment provider would be less than significant in this regard.

d) *Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less Than Significant Impact:

In 2019, a total of 33,742 tons of solid waste were disposed in 21 permitted landfills serving the City. Among the 21 permitted landfills serving the City, Corinda Los Trancos Landfill, Monterey Peninsula Landfill, Recology Ostrom Road Landfill, and John Smith Road Landfill admitted the majority of the City's waste; refer to Table 26, Landfills Serving the City.

Construction

All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the proposed project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to “reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible.” The California Integrated Waste Management Act of 1989 requires that at least 50 percent of waste produced is recycled, reduced, or composted and is included as Municipal Code Chapter 8.05, Recycling and Diversion of Construction and Demolition Debris. The project would also be required to demonstrate compliance with the 2022 Green Building Code, which includes design and construction measures that act to reduce construction-related waste through material conservation measures and other construction-related efficiency measures. Compliance with these programs would ensure the project’s construction-related solid waste impacts would be less than significant.

Operation

Based on the project’s air quality and greenhouse gas modeling (Appendix A, AQ/GHG/Energy Study), project operations are expected to generate approximately 76.4 tons of solid waste per year, or approximately 0.21 tons per day (tpd) without project design features related to recycling or composting. With implementation of recycling and composting, the approximately 0.21 tpd would be reduced; however, for purposes of this analysis, the maximum tpd is assumed. The 0.21 tpd is anticipated to represent less than 0.01 percent of any landfill’s maximum daily permitted throughput capacity identified in Table 26. As such, the project is not anticipated to 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. Impacts would be less than significant in this regard.

Table 26.
Landfills Serving the City

Landfill/Location	Amount Disposed by City in 2019 (tons per day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Corinda Los Trancos Landfill (Ox Mtn) 2 Mile North-East Half Moon Bay off Highway 92 Half Moon Bay, CA 94019	22,566	3,598	17,240,000	01/01/2034
John Smith Road Landfill 2650 John Smith Road Hollister, CA 95023	406	1,000	1,921,000	08/01/2025
Monterey Peninsula Landfill 14201 Del Monte Boulevard Marina, CA 93933	9,732	3,500	48,560,000	02/28/2107
Recology Ostrom Road Landfill Inc. 5900 Ostrom Road Wheatland, CA 95692	482	3,000	32,225,000	12/31/2066

Sources: California Department of Resources Recycling and Recovery, SWIS Facility/Site Search, <https://www2.calrecycle.ca.gov/SolidWaste/Activity>, accessed October 12, 2025.

California Department of Resources Recycling and Recovery, Jurisdiction Disposal By Facility, Disposal during 2019 for San Carlos, <https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility>, accessed October 12, 2025.

Notes:

¹ Altamont Landfill and Resource Recovery, Azusa Land Reclamation Company Landfill, Billy Wright Disposal Site, Clean Harbors Buttonwillow LLC, Fink Road Landfill, Foothill Sanitary Landfill, Forward Landfill, Inc., Guadalupe Sanitary Landfill, Kirby Canyon Recycling and Disposal Facility, Newby Island Sanitary Landfill, North County Landfill and Recycling Center, Potrero Hills Landfill, Recology Hay Road, Redwood Landfill, Vasco Road Sanitary Landfill, Zanker Material Processing Facility, and Zanker Road Resource Recovery Operation, are excluded from Table 26 as these facilities accepted less than one percent of the City’s solid waste in 2019 (the last available reporting year).

e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less Than Significant Impact: Refer to Response 3.19(d) above. The proposed project would be required to comply with all federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act of 1989 and the City's recycling program. Specifically, pursuant to Municipal Code Chapter 8.05, at least 50 percent of construction and demolition waste generated must be diverted from landfilling by using recycling, reuse, or other diversion programs. As such, less than significant impacts would occur in this regard.

MITIGATION MEASURES

Project implementation would not result in significant impacts related to utilities and service systems; therefore, no mitigation measures are required.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, 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 or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Regulatory Setting

Regulations at the local level applicable to the proposed project related to wildfire include the 2045 General Plan Reset Environmental Impact Report (General Plan EIR).

Environmental Setting

According to the California Department of Forestry and Fire Protection (CAL FIRE) and General Plan EIR, no State Responsibility Areas (SRAs) are located within the City of San Carlos (City).³⁰ However, the City's foothill neighborhoods west of Alameda de las Pulgas are designated as Very High Fire Hazard Severity Zones (FHSZ) within Local Responsibility Areas (LRAs).³¹ Within LRAs, fire protection services are generally provided by city fire departments, fire protection districts, counties, or by CAL FIRE under contract to a local government. The Redwood City and San Carlos Fire Departments provides fire protection services within the cities of Redwood City and San Carlos. According to CAL FIRE and General Plan EIR Figure 4.18-1, Very High Fire Hazard Severity Zones, the project site is not classified as being located within a moderate, high, or very high FHSZ in LRA.³²

³⁰ California Department of Forestry and Fire Protection, State Responsibility Area Fire Hazard Severity Zones, San Mateo County, April 1, 2024, <https://calfire.app.box.com/s/viyyvmwaaaciuhwfb2bdxqdok3zo0ke/file/1483769665386>, accessed September 30, 2025.

³¹ California Department of Forestry and Fire Protection, Local Responsibility Area Fire Hazard Severity Zones, City of San Carlos – San Mateo County, February 24, 2025, <https://calfire.app.box.com/s/wahuw9ny7cgn89xpxh7092ur50r1pwvj/file/1785863154775>, accessed September 30, 2025.

³² Ibid.

- a) ***Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

No Impact: According to CAL FIRE and General Plan EIR Figure 4.18-1, the project site is not located within or near an SRA nor is the project site classified as very high FHSZ. As such, project implementation would have no impact in this regard.

- b) ***Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

No Impact: Refer to Response 3.20(a).

- c) ***Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

No Impact: Refer to Response 3.20(a).

- d) ***Would the project 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: Refer to Response 3.20(a).

MITIGATION MEASURES

Project implementation would not result in significant impacts related to wildfire; therefore, no mitigation measures are required.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Regulatory Setting

Refer to the respective topical sections listed below for each section's corresponding regulatory setting.

Environmental Setting

Refer to the respective topical sections listed below for each section's corresponding environmental setting.

- 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: As detailed in Section 3.4, Biological Resources, the project site is developed and located within an urbanized area of the City of San Carlos (City). Based on the site's condition, no sensitive plant or animal species would be present. Thus, the project would have no impacts on sensitive plant or animal species. However, the on-site trees and off-site street trees located along Commercial Street could provide suitable nesting habitat for migratory birds. Mandatory compliance with the Migratory Bird Treaty Act would reduce the project's potential construction-related impacts to nesting birds. Additionally, project implementation is not anticipated to result in adverse impacts to known cultural or tribal cultural resources; refer to

Section 3.5, Cultural Resources, and Section 3.18, Tribal Cultural Resources. However, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. Should project excavation activities encounter previously undiscovered archaeological resources, MM-CUL-1 would require all construction work to halt until a qualified archaeologist evaluates the find. With the implementation of MM-CUL-1, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, and impacts would be reduced to less than significant levels. Therefore, the proposed project would not potentially 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, 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. Impacts would be less than significant with mitigation incorporated in this regard.

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)?***

Less Than Significant Impact With Mitigation Incorporated: A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Section 3.1 through Section 3.20, the proposed project would not result in any significant impacts in any environmental categories with implementation of project mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be considerable when viewed in connection with the effects of past projects, current projects, or probable future projects. Impacts would be less than significant with mitigation incorporated in this regard.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

Less Than Significant Impact With Mitigation Incorporated: Previous sections of this Initial Study reviewed the proposed project’s potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, traffic, and other issues. As concluded in these previous discussions, the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and implementation of project mitigation measures. Impacts would be less than significant with mitigation incorporated in this regard.

MITIGATION MEASURES

Refer to the respective topical sections listed above for each section’s corresponding mitigation measures.

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