Initial Study

11 El Camino Real Residential Project

Prepared by

CITY OF SAN CARLOS
THE CITY OF GOOD LIVING
CALIFORNIA

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

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Appendix H: Sanitary Sewer Analysis

All appendices are incorporated herein by reference.

Section 1.0 Introduction and Purpose

1.1 Purpose of the Initial Study

The City of San Carlos, as the Lead Agency, has prepared this Initial Study for the 11 El Camino Real Residential Project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of San Carlos, California.

This Initial Study has been prepared to provide evidence to support the project's qualification for a Class 32 Categorical Exemption (in-Fill Development – CEQA Guidelines 15332). For the project to qualify for a Class 32 Exemption it would need to:

(1) be consistent with all applicable land use designations, regulations, and policies,
(2) be located on a site that is less than five acres within city limits,
(3) have no habitat value,
(4) no significant traffic, noise, air quality, or water quality impacts, and
(5) be adequately served by all required utilities and public services.

Furthermore, the project must not have any of the exceptions noted in CEQA Guidelines Section 15300.2.

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The project proposes to demolish the existing commercial building, parking lot, and landscaping on-site and construct a new six-story apartment building with 242 residential units, one level of below grade parking and one level of podium parking. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

Section 2.0 Project Information

2.1 Project Title

11 El Camino Real Residential Project

2.2 Lead Agency Contact

Rucha Dande, Senior Planner
Community Development Department
600 Elm Street
San Carlos, CA 94070
(650) 802-4231
rdande@cityofsancarlos.org

2.3 Project Applicant

Richard Norris
Summerhill Apartment Communities
777 S. California Avenue
Palo Alto, CA 94304
(650) 824-2411
rnorris@shapartments.com

2.4 Project Location

11 El Camino Real, San Carlos California, 94070 (see Figure 2.6-1 through Figure 2.6-3)

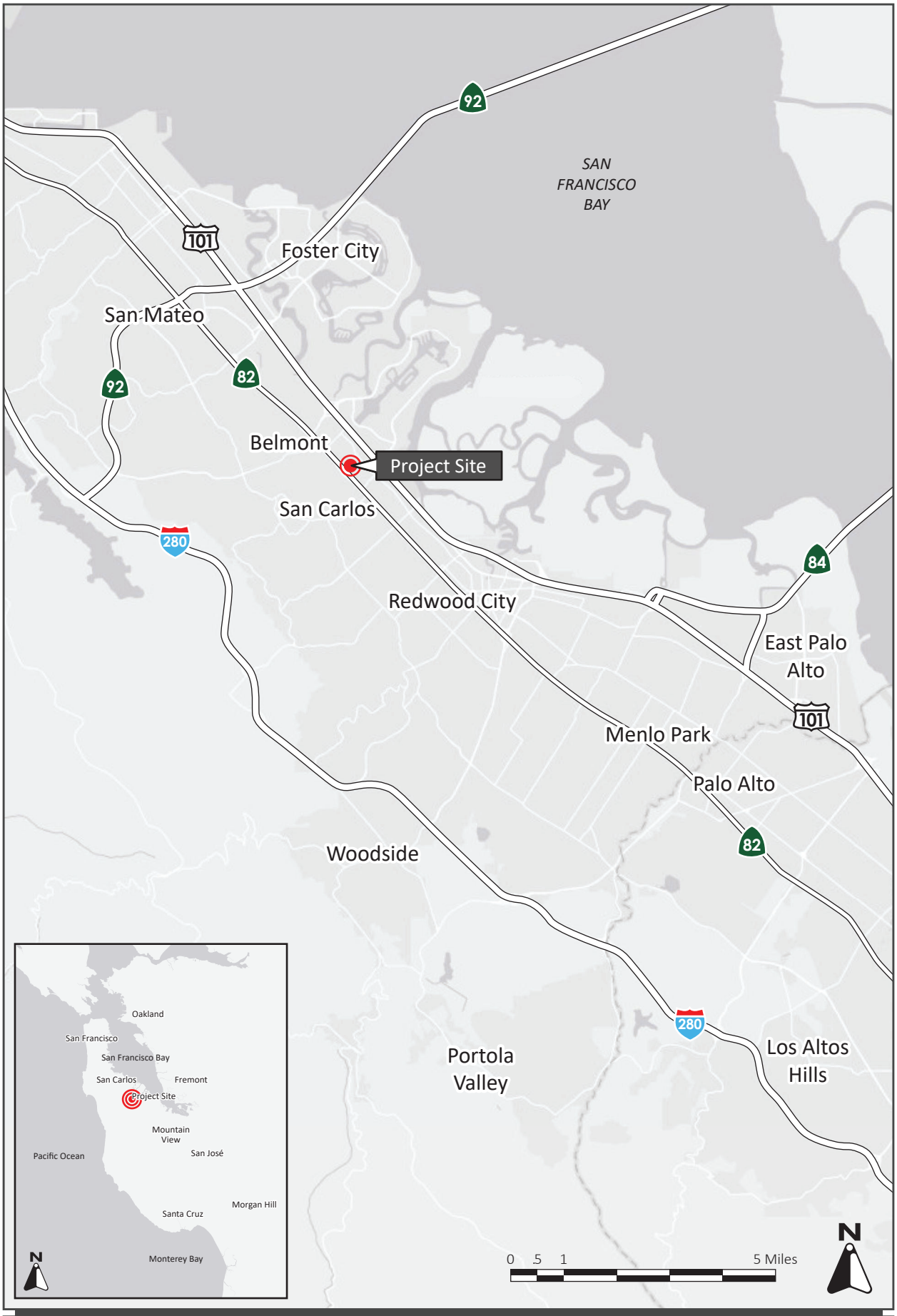
2.5 Assessor's Parcel Number

045-320-170 and 045-320-220

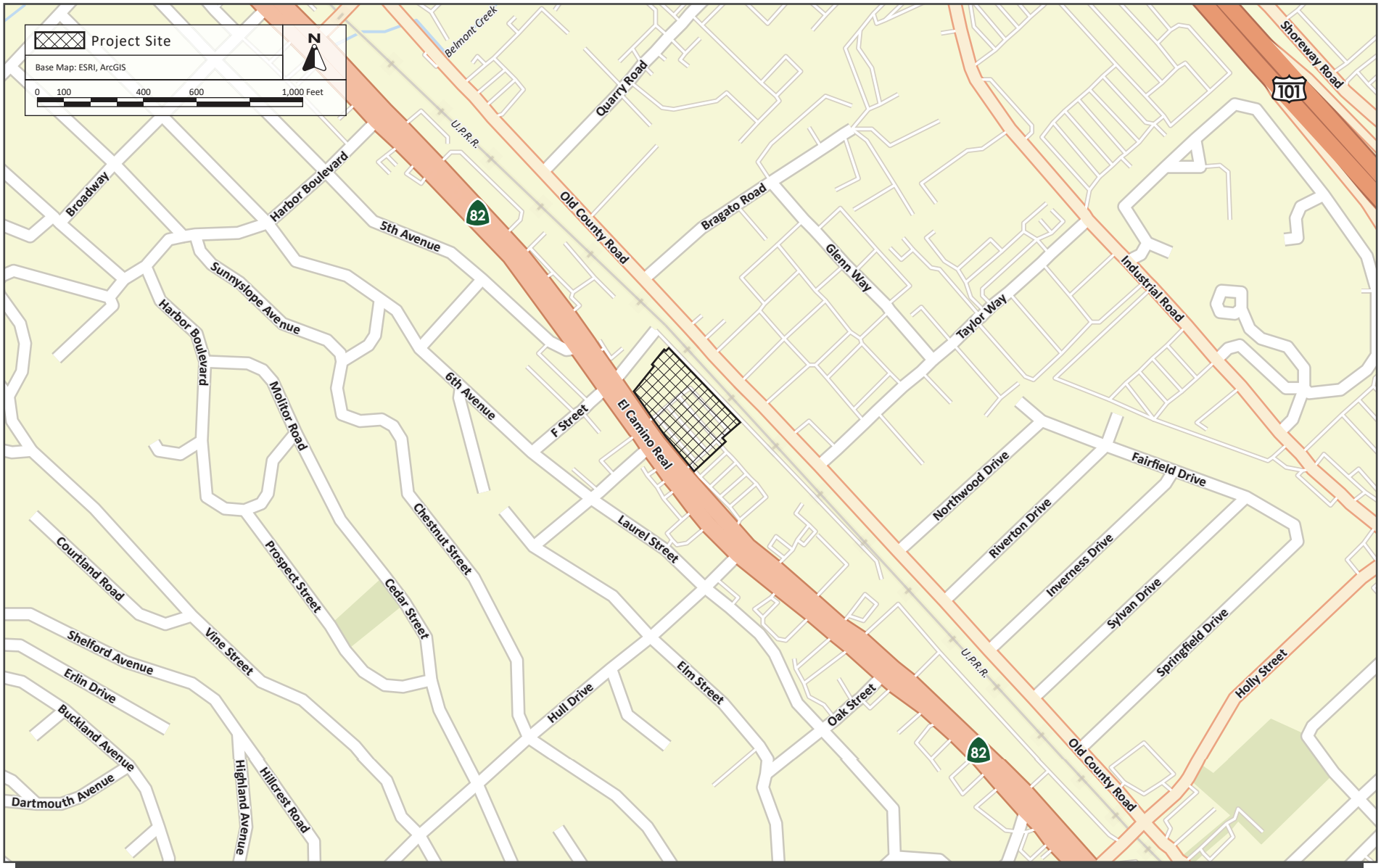
2.6 General Plan Designation and Zoning District

The project site has a land use designation of Mixed-Use 90-120 Dus/AC in the 2030 General Plan and is zoned Mixed-Use North Boulevard (MU-NB-120) in the San Carlos Municipal Code, as amended in January 2023.[1]

[1] The San Carlos City Council adopted a Focused General Plan and Zoning Code update on January 23, 2023. These documents updated the site's zoning to MU-NB-120 Mixed-Use North Boulevard, a district intended to facilitate the transformation of the northern portion of El Camino Real into a multi-modal, mixed-use corridor to help achieve the goals of the 2023-2031 Housing Element. Source: City of San Carlos. "San Carlos Housing 2040, Documents." Accessed April 19, 2023. https://www.sancarlos2040.org/documents



REGIONAL LOCATION MAP | FIGURE 2.6-1



VICINITY MAP | FIGURE 2.6-2

AERIAL MAP OF PROJECT SITE AND SURROUNDING LAND USES | FIGURE 3.2-3

2.7 Project-Related Approvals, Agreements, and Permits

The project includes the following discretionary approvals by the City and other relevant agencies:

- Design Review
- Vesting Tentative Map
- Protected Tree Removal Permit
- Transportation Demand Management Plan
- Conditional Use Permit for four ground floor units on El Camino Real
- Below Market Rate Housing Plan
- Density Bonus Development Standard and Incentives Waiver
- Dirt Haul and Grading Permit
- Caltrans Encroachment Permit

Section 3.0 Project Description

3.1 Project Location

The approximately 2.2-acre site is located at 11 El Camino Real (Assessor's Parcel Numbers 045-320-170 and 045-320-220) in the City of San Carlos. The project site is bounded by a vacant parcel to the north, commercial uses to the south, El Camino Real and commercial uses to the west, a vacant publicly owned parcel and Caltrain tracks beyond it to the east. A pedestrian undercrossing of the Caltrain tracks is located approximately 75 feet northeast of the project site at the end of F Street. The San Carlos and Belmont Caltrain stations are located approximately 0.55 miles south and 0.7 miles north of the project site, respectively. The project site is currently developed with a one-story, approximately 28,000 square foot commercial building, currently occupied by CVS drug store, associated surface parking lot, and landscaping.

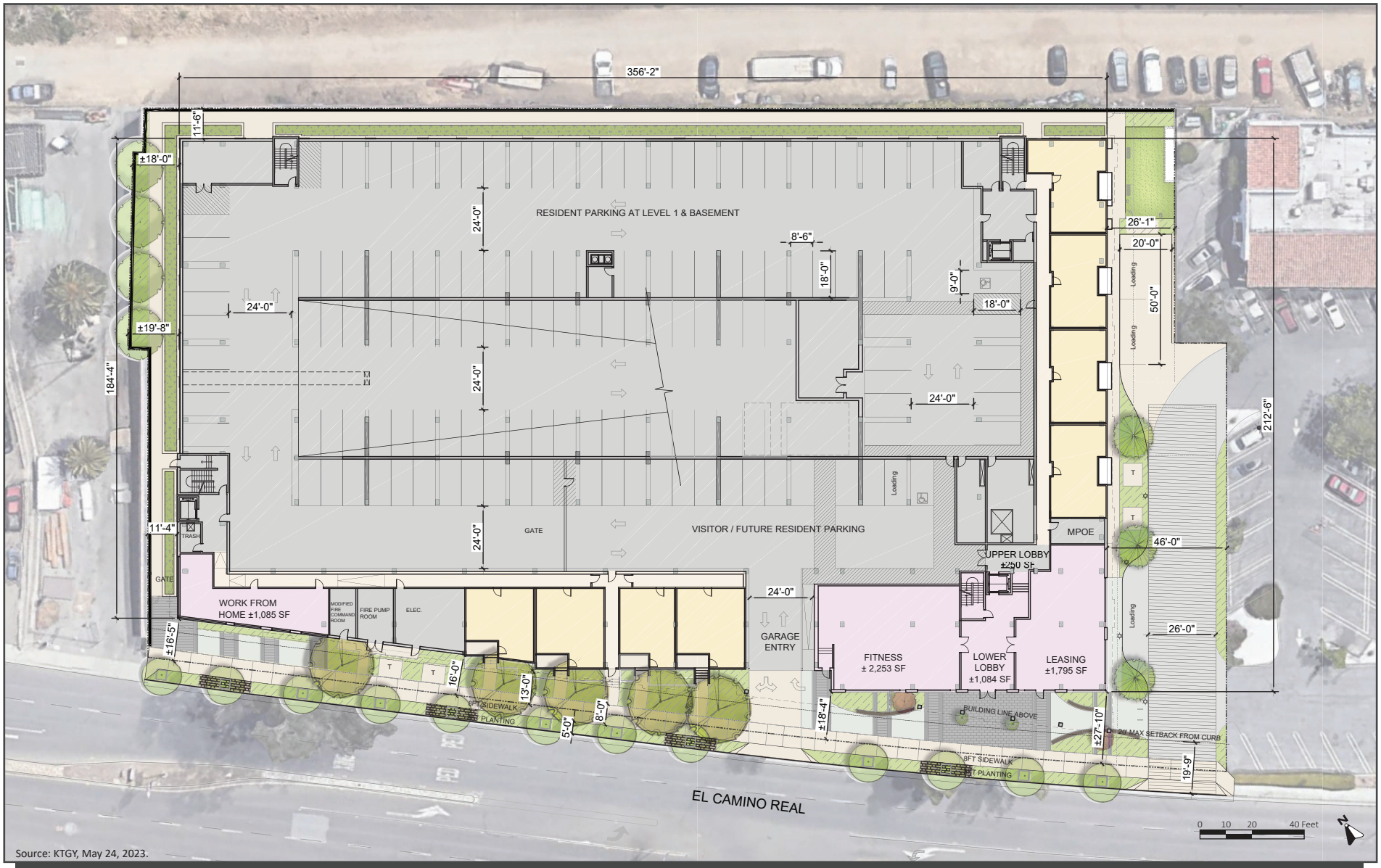
3.2 Project Description

The project would demolish the existing one-story, approximately 28,000 square foot commercial building, parking lot, and landscaping on-site and construct a new six-story apartment building with up to 242 residential units[2], one level of below grade parking, and one level of podium parking. The building would have a maximum height of approximately 82 feet to the top of the parapet and would include a leasing office, lobby, work-from-home space, fitness studio, clubroom, WiFi lounge, and other amenity spaces for residents. A total of approximately 19,180 square feet of shared open space would be provided in the form of two rooftop decks on the fifth and sixth floors, and two courtyards on the second floor. In addition, a fenced dog area would be provided in the southeast corner of the site for use by future residents. Approximately 21,000 square feet of additional private open space would also be provided in the form of private decks for each residential unit. A site plan for the proposed project is provided in Figure 3.2-1. Conceptual building elevations are shown on Figure 3.2-2 and Figure 3.2-3.

3.2.1 Landscaping

Existing on-site landscaping is limited and includes ornamental trees and shrubs along the perimeter of the site and building and in median islands within the surface parking lot. There are 23 trees present on and adjacent to the project site, including six that are considered protected trees under the City's Municipal Code. The project would remove 19 trees, including the six protected trees and 12 other trees on-site and one tree within the adjacent property to the south, in coordination with the property owner. Fifty-four replacement trees and ornamental shrubs would be planted around the perimeter of the site and new building, as well as within the two courtyards. Figure 3.2-7 shows the conceptual landscaping plan.

[2] Of the 242 residential units proposed, 36 units (15 percent) would be deed-restricted affordable units, including 24 units reserved for Very Low-income households and 12 units reserved for Low-income households.



Source: KTGY, May 24, 2023.

PROPOSED SITE PLAN

FIGURE 3.2-1

SOUTH ELEVATION

WEST ELEVATION

Source: KTGY, May 24, 2023.

CONCEPTUAL SOUTH AND WEST ELEVATIONS

FIGURE 3.2-2

NORTH ELEVATION

EAST ELEVATION

Source: KTGY, May 24, 2023.

CONCEPTUAL NORTH AND EAST ELEVATIONS

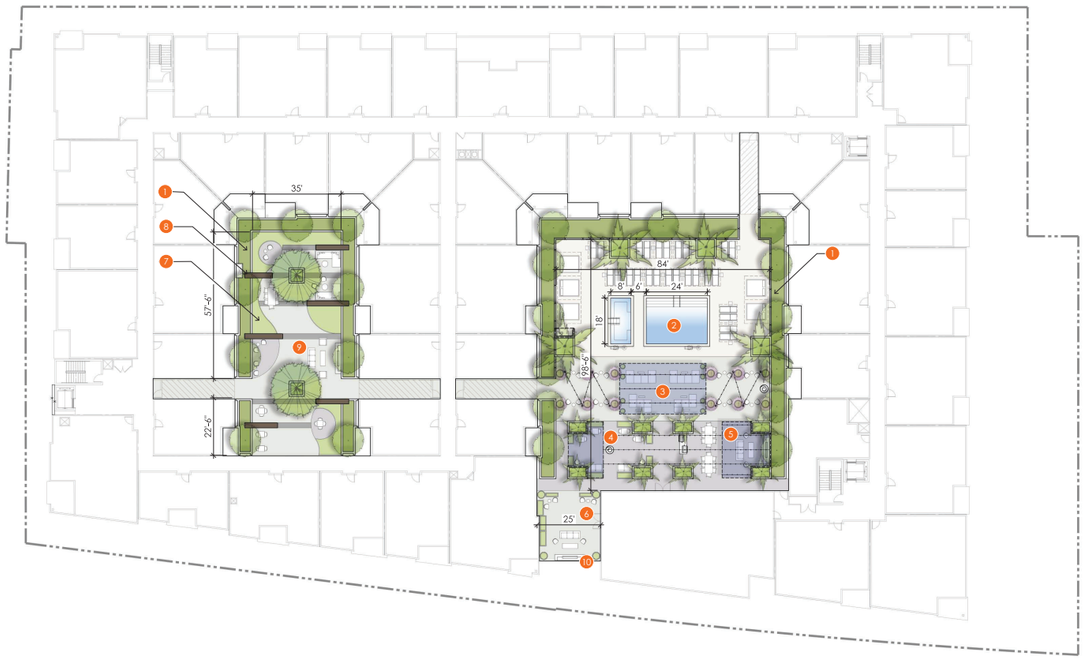
FIGURE 3.2-3

LEGEND

1. MAIN PLAZA WITH CURVED PLANTING BEDS, CUSTOM BENCH SEATING, AND DECORATIVE PAVING
2. NORTH PLAZA WITH DECORATIVE PAVING
3. CLASS II BIKE RACKS, TYP. TOTAL 24 SHORT TERM PARKING SPACES PROVIDED. SEE SHEET L-7 FOR MORE INFORMATION
4. 5FT WIDE PLANTER STRIP (CURB & PLANTING)
5. STREET TREE. INSTALLED IN LARGE POTS DUE TO UNDERGROUND UTILITIES. SEE L-6 FOR MORE INFORMATION. IMPROVEMENT TO BE MAINTAINED BY PROJECT OWNER.
6. 8FT WIDE DETACHED CONCRETE SIDEWALK
7. UNIT ENTRIES WITH STAIRS, HANDRAILS, AND RAISED PLANTERS. PLANTERS TO BE CMU OR CONCRETE, COLOR TO BE BROWN TO COMPLIMENT THE BUILDING. WALL HEIGHT NOT TO EXCEED 3FT.
8. WOOD PERIMETER FENCING, 6FT HT. LOCKING GATES EQUIPPED WITH EGRESS HARDWARE AND KNOX BOX FOR FIRE ACCESS. TREX MATERIAL USED AT DOG AREA, STYLE TO MATCH.
9. ENCLOSED DOG AREA WITH 5FT HT TUBE STEEL FENCING, SYNTHETIC TURF SURFACING, BENCHES, DRINKING FOUNTAIN, DOG BAG STATION
10. TRANSFORMER ON CONCRETE PAD, TYP OF 4
11. PERIMETER PATHWAY, SEE CIVIL PLANS
12. EXISTING TRANSFORMER
13. MOVING/LOADING
14. RETAINING WALL, SEE CIVIL PLANS
15. POLE LIGHT, SEE JOINT TRENCH DRAWINGS
16. STREET LIGHT, SEE JOINT TRENCH DRAWINGS
17. VISION/SIGHT TRIANGLE

0 10 20 40 Feet

N



LEGEND

1. STORMWATER PLANTER, TYP
2. POOL AREA WITH POOL, SPA, SHOWER, AND SUN LOUNGE FURNITURE
3. CENTRAL ARCADE WITH LARGE SHADE STRUCTURE, STRING LIGHTS, POTS, AND LOUNGE SEATING
4. PASSIVE LOUNGE WITH SHADE STRUCTURE AND FOCAL ELEMENT
5. ACTIVE LOUNGE FOR DINING WITH TV, SHADE STRUCTURE, STRING LIGHTS, AND 2 ELECTRIC GRILLS
6. VIEW AREA WITH ELECTRIC FIREPLACE AT PARAPET
7. LOW PLANTING, TYP
8. PARTITION, TYP
9. ELECTRIC FIREPIT AND LOUNGE SEATING
10. 6FT GLASS SOUND PANEL AT BUILDING EDGE

Source: JETT Landscape Architecture + Design, May 24, 2023.

CONCEPTUAL LANDSCAPING PLAN

FIGURE 3.2-4

3.2.2 Site Access and Parking

Vehicular access to the site is currently provided via two existing full access driveways on El Camino Real, one approximately 15 feet north of the southern property line and one near the middle of the site. The proposed project would replace the existing driveways on-site with two new driveways. The driveway along the southern property line would be located slightly south of its current alignment and the central driveway would be adjusted to align with Spring Street. The central driveway would provide full access to the parking garage and the driveway along the southern property line would provide access to a 26-foot-wide emergency vehicle access, moving-in loading zone, trash areas, and the adjacent parking lot to the south.

The project would include 297 automobile parking spaces within one level of basement parking and one level of at-grade podium parking. Of the 297 automobile parking spaces, 97 spaces would have access to California Green Building Standards Code (CALGreen) Tier 2 electric vehicle (EV) chargers and 145 spaces would include electricity infrastructure, consistent with CALGreen Tier 1 EV standards for EV ready spaces. In addition, the project would have a total of 84 bicycle parking spaces including 24 short-term spaces along El Camino Real and 60 long-term spaces in a bike storage room within the below grade parking garage.

Pedestrian access to the site would be provided via paved pedestrian paths to the four shared building entrances and four units with direct access along El Camino Real. Pedestrian improvements along El Camino would include a new widened sidewalk separated from the vehicle traffic lanes by landscaping and potted trees.

The project would extend the median island in El Camino Real to align the existing southbound left turn lane with the proposed driveway entrance to the parking garage.

3.2.3 Mechanical Equipment

The project would include mechanical equipment for building heating, cooling and ventilation (HVAC), as well as trash compactors, and a diesel-powered fire pump in case of emergency. The HVAC equipment would be located within a mechanical room within the building as well as on the rooftop of the building. Consistent with the current 2023 Title 24 Building Code, the project would include an air filtration/ventilation system rated MERV13 or higher. The ventilation system will be designed to keep the building at positive pressure when doors and windows are closed to reduce intrusion of unfiltered outside air into the building. The diesel-powered fire pump would be located within the fire pump room fronting El Camino Real and the trash compactors would be located within trash rooms in the interior of the building.

3.2.4 Utility Improvements

There are two existing utility easements extending from the eastern property line through the project site to El Camino Real, a PG&E electrical easement and a Calwater easement. Under the proposed project, these easements would be quitclaimed and relocated parallel to the southern

project boundary beneath the proposed emergency vehicle access road. In addition, an existing six-inch sanitary sewer line and 12-inch storm drainpipe currently extend from the project site to the adjacent property to the south. Under the proposed project, these existing lines would be capped at the southern property line and new connections would be installed.

The project would connect to the existing public 24-inch storm drain line within the neighboring public parcel to the east of the project site and extend a new 15-inch storm drain line around the perimeter of the building to collect storm water from the podium and grade level, connecting all of the proposed flow through planters on-site.

The project would construct a new eight-inch sanitary sewer line in El Camino Real that extends from the approximate middle of the project site to the adjacent parcel to the south.

The project would connect to the existing 12-inch water line in El Camino Real.

3.2.5 Green Building Measures

The proposed project would be built to the CALGreen standards which includes design provisions intended to minimize wasteful energy consumption. In addition, the project would include the following green building measures and design features:

- Rooftop solar photovoltaic panels
- On-site battery storage
- All electric building construction (consistent with the City's Reach Code)
- Electric Vehicle (EV) charging infrastructure (consistent with the City's Reach Code and CALGreen)
- Transportation Demand Management (TDM) plan (consistent with the City's Municipal Code)
- Water efficient landscaping and irrigation systems
- Electricity provided by Peninsula Clean Energy

3.2.6 Construction

Construction of the project would be completed in one phase over a period of two years and two months. Construction activities are requested to occur between 7:00 AM and 5:00 PM, Monday through Friday, and from 9:00 AM to 5:00 PM on Saturdays.[3] During project construction, the existing building, pavement, landscaping, and improvements on-site would be removed. The existing driveways would be retained during project construction to provide access to the site.

[3] Per Municipal Code Section 9.30.070 limits construction to between the hours of 8:00 AM and 5:00 PM, Monday through Friday, and from 9:00 AM to 5:00 PM on Saturdays. The proposed project requests an Incentive from Section 9.30.070 of the Municipal Code under the State Density Bonus law and proposes construction between 7:00 AM and 5:00 PM Monday through Friday, and from 9:00 AM to 5:00 PM on Saturdays for a period of two years and four months.

Excavation would be required to a depth of approximately 12 feet below the ground surface (bgs) for the building foundation, 14 feet bgs for utility lines and connections, and up to 16 feet bgs for the elevator pit. In addition, piers would be drilled up to 30 feet bgs for a soil reinforcement system beneath the foundation. Approximately 19,200 cubic yards of soil would be exported from the site and 1,250 cubic yards of soil would be imported, for a net export of 17,950 cubic yards of soil.

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

As noted in Section 1.0, this Initial Study has been prepared to provide evidence to support the project's qualification for a Class 32 Categorical Exemption (in-Fill Development – CEQA Guidelines 15332). As such, not all resource areas are required to be addressed and this Initial Study has been focused to address those resource areas necessary to support the Categorical Exemption and demonstrate that none of the exceptions to the Class 32 Categorical Exemption apply to the project. The following resource areas are not analyzed in this Initial Study:

Aesthetics: The project is consistent with the existing land use designation and zoning for the site and is located within a transit priority area on an infill site. Pursuant to SB 743 (Public Resources Code Section 21099 [d][1]) "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area shall not be considered significant impacts on the environment;" therefore, the aesthetics impacts of the project would not be significant. Furthermore, the project site is not located along a State-designated scenic highway. The nearest State-designated scenic highway is Interstate 280 from Alpine Road in Palo Alto to Valleywood Drive in San Bruno, approximately 2.3 miles west of the project site.[4] Therefore, exemption d is not applicable, and no further discussion of aesthetic resources is required.

Agriculture and Forestry Resources: The property is a developed urban infill site, and the San Mateo County Important Farmland 2018 Map designates the project site as Urban and Built-up land.[5] There is no forest land located on or adjacent to the project site and the site is not subject to a Williamson Act contract. Therefore, the project would have no impact to agriculture or forestry resources and no further discussion is required.

Mineral Resources: The project site is located in Mineral Resource Zone (MRZ)-1.[6] There are no known mineral resources located on or adjacent to the project site. The nearest location classified to have significant minerals present, or a high likelihood of minerals present is located approximately 0.6 mile to the west. Therefore, the project would have no impact on mineral resources and no further discussion is required.

Population and Housing: The proposed project is consistent with the existing General Plan land use designation and growth projections for the site and would not directly result in substantial unplanned population growth. The project site was included in the 2023 Housing Element sites inventory as a location for future housing development.[7] The project site is developed with a

[4] Caltrans. "California State Scenic Highway System Map." Accessed March 30, 2023. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa
[5] Department of Conservation. San Mateo County Important Farmland 2018. Map. September 2019.
[6] California Department of Conservation. *Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region*. 1996.
[7] City of San Carlos. San Carlos Housing Element. January 2023. Page 149.

commercial building and the project would not displace residents or housing. Furthermore, the project would not extend roads or other infrastructure that would indirectly induce growth. Therefore, the project would have no impact on population and housing and no further discussion is required.

Recreation: Recreation impacts are addressed under Public Services. Not further discussion is required.

Wildfire: The project site is located in an urban area surrounded by existing development that is not near any wildlands that could present a fire hazard. The site is not located within an identified Very High Fire Hazard Severity Zone in a State Responsibility Area or a Local Responsibility Area. [8] [9] Therefore, the project would have no impact on wildfires and no further discussion is required.

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

4.3	Air Quality	4.13	Noise
4.4	Biological Resources	4.15	Public Services
4.5	Cultural Resources	4.17	Transportation
4.6	Energy	4.18	Tribal Cultural Resources
4.7	Geology and Soils	4.19	Utilities and Service Systems
4.8	Greenhouse Gas Emissions	4.21	Mandatory Findings of Significance
4.9	Hazards and Hazardous Materials		
4.10	Hydrology and Water Quality		
4.11	Land Use and Planning		

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section.

[8] CalFire. San Mateo County State Responsibility Area Fire Hazard Severity Zones. November 21, 2022.
[9] CalFire. San Mateo County Local Responsibility Area Fire Hazard Severity Zones. November 24, 2008.

Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.3 refers to the third mitigation measure for the first impact in the Biological Resources section.

4.1 Air Quality

The following discussion is based upon an Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc. in August 2023. A copy of the Air Quality & Greenhouse Gas Assessment is included as Appendix A to this Initial Study.

4.1.1 Environmental Setting

4.1.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O_3), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.[10] Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 4.1-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table4.1-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
O_3	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	Aggravation of respiratory and cardiovascular diseases Irritation of eyes Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	Aggravation of respiratory illness Reduced visibility
Fine Particulate Matter and Coarse Particulate Matter	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	Reduced lung function, especially in children Aggravation of respiratory and cardiorespiratory diseases Increased cough and chest discomfort Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	Cancer Chronic eye, lung, or skin irritation Neurological and reproductive disorders

High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O_3 levels.

[10] The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants

TACs are a broad class of compounds known to have health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[11] Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are 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, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

[11] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed March 30, 2023. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

4.1.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O_3, CO, SO_x, NO_x, and lead.

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

Risk Reduction Plan

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

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are

potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.[12]

CEQA Air Quality Guidelines

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

City of San Carlos 2030 General Plan

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

Policy	Description
EM-6.1	Support and comply with the Bay Area Air Quality Management District, State and federal standards and policies that improve air quality in the Bay Area.
EM-6.3	Support the reduction of emissions of particulates from wood burning appliances, construction activity, automobiles, trucks and other sources.
EM-6.4	Implement Bay Area Air Quality Management District (BAAQMD) guidelines that establish minimum screening or buffer distances between emissions sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements, but can be determined compatible with adjacent uses through a project-specific study that determines potential health risk. Mitigation measures shall be required to reduce these risks to acceptable levels.
EM-6.6	BAAQMD recommended measures to reduce PM10 and exhaust emission associated with construction shall be applied to new development in San Carlos.

4.1.1.3 *Existing Conditions*

The Bay Area is considered a non-attainment area for ground-level O_3, $PM_{2.5,}$ and PM_{10} under both the federal Clean Air Act and state Clean Air Act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3 and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$, and apply to both construction period and operational period impacts.

Pollutant emissions at the project site are generated by vehicle trips and building energy use.

[12] BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

Table 4.1-2 shows violations of state and federal standards at the monitoring station in Redwood City (the nearest monitoring station to the project site) during the 2017 – 2019 period (the most recent year for which data is available).

Table 4.1-2: Ambient Air Quality Standards Violations and Highest Concentrations

Pollutant	Standard	Days Exceeding Standard		
		2017	2018	2019
REDWOOD CITY STATION				
Ozone	State 1-hour	2	0	0
	Federal 8-hour	2	0	2
Carbon Monoxide	Federal 8-hour	0	0	0
Nitrogen Dioxide	State-1 hour	0	0	0
PM^{10}	Federal 24-hour	--	--	--
	State 24-hour	--	--	--
$PM^{2.5}$	Federal 24-hour	6	13	0
Source: BAAQMD. "Air Pollution Summaries (2017 -2019)." Accessed May 30, 2023. https://www.baaqmd.gov/about-air-quality/air-quality-summaries				

Sensitive Receptors

The nearest sensitive receptors to the project site are the multi-family residences to the north, approximately 85 feet across F Street from the project site.

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

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

The BAAQMD CEQA Air Quality Guidelines set forth criteria for determining consistency with the 2017 CAP. In general, a project is considered consistent if, a) the plan supports the primary goals of the 2017 CAP; b) it includes relevant control measures; and c) it does not interfere with implementation of 2017 CAP control measures. The project's consistency with the Bay Area 2017 CAP is summarized below in Table 4.1-3.

Table4.1-3: Applicable Control Measures

Control Measure	Project Consistency with Measure Intent
SS30 - Residential Fan Type Furnaces: Reduce NOx emission limits on new and replacement central furnace installations. Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use.	The City adopted a Reach Code ordinance which prohibits natural gas infrastructure in all new construction. The proposed project would include all electric building construction, consistent with the City's Reach Code. The project is consistent with this measure.
TR9- Bicycle and Pedestrian Access and Facilities: Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	The proposed project would add 242 residential units and increase the density of development within walking distance of the San Carlos and Belmont Caltrain stations. The project would also include bicycle parking consistent with City requirements. In addition, there are sidewalks and crosswalks along the surrounding roadways to facilitate non-automotive access. For these reasons, the project is consistent with this measure.
TR13 - Parking Policies: Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing in high-traffic areas.	The project proposes parking consistent with City urban design policies and guidelines. Parking for the project would be provided within a below-grade and podium level parking garage that would be wrapped with the building facade to maintain the pedestrian-oriented nature of the street, which would encourage pedestrian activity. For these reasons, the project is consistent with this measure.
EN2 - Decrease Electricity Demand: Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	The project would be designed to comply with the City's Green Building Ordinance and the most recent CALGreen requirements. Furthermore, the project would include rooftop solar photovoltaic panels to increase the supply of renewably sourced electricity and offset the project's electricity demand. For these reasons, the project would be consistent with this measure.
BL1 - Green Buildings: Collaborate with partners such as KyotoUSA to identify energy related improvements and opportunities for onsite renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the California Green Building Standards Code (CALGreen; Title 24)	As discussed above, the project would be designed to comply with the City's Green Building Ordinance and the most recent CALGreen requirements. The project is consistent with this measure.

statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	
BL2 - Decarbonize Buildings: Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	As noted above, the City adopted a Reach Code ordinance which prohibits natural gas infrastructure in all new construction. The proposed project would include all electric building construction, consistent with the City's Reach Code. The project is consistent with this measure.
BL4 - Urban Heat Island Mitigation: Develop and urge adoption of a model ordinance for "cool parking" that promotes the use of cool surface treatments for new parking facilities, as well existing surface lots undergoing resurfacing. Develop and promote adoption of model building code requirements for new construction or reroofing/roofing upgrades for commercial and residential multifamily housing.	All of the parking proposed by the project would be enclosed within a below-grade or podium level parking structure. Therefore, the proposed project is consistent with this measure.
NW2 - Urban Tree Planting: Develop or identify an existing model municipal tree planting ordinance and encourage local governments to adopt such an ordinance. Include tree planting recommendations, BAAQMD's technical guidance, best management practices for local plans, and CEQA review.	A total of 19 trees on and adjacent to the site would be removed as part of the project. The project would be required to comply with the City's tree replacement policy which would result in 54 replacement trees being planted. Therefore, the project is consistent with this control measure.
WA3 - Green Waste Diversion: Develop model policies to facilitate local adoption of ordinances and programs to reduce the amount of green waste going to landfills.	Organics waste generated by all residential uses in San Mateo is currently collected and composted by Recology San Mateo County to prevent this waste from being deposited at landfills. Therefore, the project is consistent with this measure.
WA4 - Recycling and Waste Reduction: Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	As noted above, all organic waste generated by residential uses in the City is currently collected and composted by Recology San Mateo County to prevent this waste from being deposited at landfills. In addition, the project would comply with the City's Construction and Demolition Diversion Program during construction which ensures that at least 75 percent of construction waste generated by the project is recovered and diverted from landfills. Therefore, the project is consistent with this control measure.
WR2 – Support Water Conservation: Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	The project includes water efficient landscaping and irrigation systems throughout the site. For this reason, the project would be consistent with this measure.

The project is consistent with the planned growth in the General Plan and the applicable control measures identified above. Therefore, the proposed project would not result in a significant impact related to consistency with the Bay Area 2017 CAP. **(Less than Significant Impact)**

Regional Criteria Pollutant Emissions

The California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to estimate criteria pollutant emissions from project construction and operations. The project land use types and size and anticipated construction schedule were input into CalEEMod (refer to Appendix A for details regarding assumptions and CalEEMod inputs).

Construction Period Emissions

Construction emissions would be generated primarily by operation of construction equipment and vehicles on-site and on area roadways. The project construction schedule and equipment usage assume the project would take approximately two years and two months to construct beginning in 2024. Table 4.1-4 shows average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project.

Table4.1-4: Construction Period Emissions

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Total Construction Emissions (tons)				
2024	0.03	0.46	0.01	0.01
2025	2.78	0.50	0.01	0.01
2026	0.01	0.07	0.01	0.01
Average Daily Emissions (pounds)				
2024 (172 construction workdays)	0.36	5.39	0.13	0.12
2025 (261 construction workdays)	21.28	3.84	0.07	0.06
2026 (147 construction workdays)	0.15	0.91	0.01	0.01
BAAQMD Thresholds (pounds per day)	*54*	*54*	*82*	*54*
Exceeds Threshold?	**No**	**No**	**No**	**No**
Source: Appendix A				

As shown in Table 4.1-4, the project generated construction criteria pollutant emissions would not exceed the BAAQMD significance thresholds during any year of construction. Therefore, the impact would be less than significant.

Operational Emissions

Operational period criteria pollutant emissions associated with the project would be generated primarily from vehicles driven by future residents. In addition, the project proposes one diesel powered fire pump located on the southwest side of the first floor near El Camino Real. The diesel

engine would be tested periodically and provide power to a fire pump to power the sprinkler system in the event of a building fire. It is assumed that the fire pump would be operated primarily for testing and maintenance purposes. CalEEMod was used to estimate emissions from operation of the project. The earliest the project would be constructed and operational would be 2027. Any emissions associated with build out later than 2027 would be lower than current emissions due to assumed efficiencies over time. The assumptions and results are described in detail in the Air Quality Assessment prepared for the project (refer to Appendix A). The estimated daily operational emissions from the proposed project are summarized in Table 4.1-5 below.

Table4.1-5: Operational Period Emissions

Scenario	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
2027 Annual Project Operational Emissions (tons/year)	2.13	0.26	0.74	0.19
Project Fire Pump (tons/year)	0.00	0.15	<0.01	<0.01
BAAQMD Thresholds (tons/year)	*10*	*10*	*15*	*10*
Exceeds Threshold?	**No**	**No**	**No**	**No**
2027 Daily Project Operational Emissions (pounds/day)	11.66	2.28	4.10	1.08
BAAQMD Thresholds (pounds/day)	*54*	*54*	*82*	*54*
Exceeds Threshold?	**No**	**No**	**No**	**No**
Notes: Assumes 365-day operations Source: Appendix A				

As shown in Table 4.1-5, project generated operational emissions would not exceed the BAAQMD significance thresholds for any criteria pollutants.

Construction and operation of the proposed project would not result in a significant increase of regional criteria pollutants and would not conflict with or obstruct implementation of the 2017 CAP. **(Less than Significant Impact)**

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?

Per the BAAQMD CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As discussed under checklist question a above, the proposed project would not, by itself, result in any air pollutant emissions exceeding BAAQMD's significance thresholds. As a result, the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. **(Less than Significant Impact)**

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

Fugitive Dust Emissions

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices are implemented to reduce these emissions.

Condition of Approval: The project would implement the following measures to control dust and exhaust during construction.

> During any construction period ground disturbance, the applicant shall ensure that the project contractor implements the following Best Management Practices (BMPs) to control dust and exhaust. The contractor shall implement the following BMPs that are 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 practicable. Building pads shall be laid as soon as practicable 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 site located 100 feet of 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 be visible to ensure compliance with applicable regulations.

With implementation of the above Conditions of Approval, construction dust emissions associated with the proposed project would be less than significant. **(Less than Significant Impact)**

Project Construction and Operational Community Health Risks

Project construction and operations would generate emissions which could result in community health risks from on-site construction activity, construction truck hauling, and increased traffic from operation of the project.

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. Construction exhaust emissions pose health risks for sensitive receptors such as surrounding residents. The primary community risk impacts associated with construction emissions are cancer risk and exposure to DPM and $PM_{2.5}$.

Operational emissions from the proposed project would include emissions from vehicle traffic and operation of the diesel-powered fire pump. Traffic from residential projects is not typically considered a source of TAC or $PM_{2.5}$ emissions that could adversely affect sensitive receptors. The proposed project would generate traffic associated with residential uses that would be distributed over various roadways. These would be primarily passenger vehicles with a low percentage of diesel trucks that would emit TACs. BAAQMD considers projects generating 10,000 total vehicle trips per day to be a low-impact source of TACs. As discussed in Appendix F, the proposed project would generate 430 net new daily trips, which is less than 10,000 total vehicle trips per day. Operation of the proposed diesel-powered fire pump would be considered a source of DPM emissions.

The health risk assessment for the proposed project (refer to Appendix A) evaluated potential health effects of sensitive receptors at nearby residences and identified a maximally exposed individual (MEI) for construction and operational emissions of DPM and $PM_{2.5}$. The MEI is located on the first floor of a multi-family residential building northwest of the project site. The location of the MEI is shown in Figure 4.1-1 below. The results of the assessment for project construction and operations are summarized in Table 4.1-6.

Table 4.1-6: Project Construction and Operational Health Risk Impacts at the Off-Site MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction (years 0 -3)	2.54 (infant)	0.02	<0.01
Project Fire Pump Operation (Years 3 – 30)	0.21 (child)	<0.01	<0.01
Total/Maximum Project Impact (Years 0 -30)	2.75 (infant)	0.02	<0.01
BAAQMD Single-Source Threshold	*10*	*0.3*	*1.0*
Exceeds Threshold?	**No**	**No**	**No**
Source: Appendix A			

As shown in Table 4.1-6, project construction and operations would not result in health risks exceeding the BAAQMD single-source thresholds and impacts would be less than significant. **(Less than Significant Impact)**

Source: Illingworth & Rodkin, Inc., May 19, 2023.

LOCATION OF PROJECT CONSTRUCTION, FIRE PUMP, OFF-SITE SENSITIVE RECEPTORS, AND MAXIMALLY EXPOSED INDIVIDUAL | FIGURE 4.1-1

Criteria Pollutant Emissions

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

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

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities.

The project would redevelop a site with an existing one-story commercial building with a 242-unit apartment building. Construction of the proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors; however, diesel exhaust have highly diffusive properties, and the odors would be localized and temporary. During operations, the proposed residential project would not generate objectionable odors. The project would not, therefore, create objectionable odors that would affect the existing residents near the site. **(Less than Significant Impact)**

4.2 Biological Resources

The following discussion is based, in part on an Arborist Report prepared for the project by Hort Science Bartlett Consulting, Inc. in March 2023 and a Biological Resources Letter prepared for the project by Live Oak Associates, Inc in January 2023. These reports are included as Appendix B and C to this Initial Study, respectively.

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

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

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

Migratory Bird Treaty Act

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

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Fish and Game Code Section 1602

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

City of San Carlos 2030 General Plan

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

Policy	Description
EM-1.1	Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications.
EM-1.2	Ensure that development is consistent with all federal, State and regional regulations for habitat and species protection.
EM-1.4	Protect and preserve the circadian cycle (the cycle of night and day) by limiting sources of light during nighttime hours.
EM-1.5	Promote the preservation of native species, habitat and vegetation types and overall natural diversity.
EM-3.1	Maintain and expand the urban canopy with special emphasis on protection of heritage trees.
EM-3.1	Implement Climate Action Plan measures to require tree planting.
EM-4.1	Review and amend the Zoning Ordinance

Tree Ordinance

Section 18.18.070 of the San Carlos Municipal Code (B) defines a "Protected Tree" as any significant or heritage tree, any tree as part of a replacement requirement, an approved development permit or an approved landscaping plan. The Municipal Code states no protected trees can be removed, pruned, or otherwise materially altered without a permit. Section 18.18.070 (B) also contains requirements to avoid construction-related impacts to retained protected trees, such as special measures for any construction activity within the dripline of a protected tree.

"Heritage Tree" means any:

- Indigenous tree whose size, as measured at fifty-four inches above natural grade (unless otherwise indicated), is defined below:
    - Aesculus californica (buckeye) with a single stem or multiple stems touching each other at fifty-four inches above natural grade and measuring nine inches in diameter or greater.
    - Arbutus meniesii (madrone) with a single stem or multiple stems touching each other at fifty-four inches above natural grade and measuring nine inches in diameter or greater.
    - Quercus agrifolia (coast live oak) of more than nine inches in diameter or greater.
    - Quercus lobata (valley oak) of more than nine inches in diameter or greater.
    - Quercus douglassii (blue oak) of more than nine inches in diameter or greater.
    - Quercus wislizneii (interior live oak) of more than nine inches in diameter or greater.
    - Sequoia sempervirens (redwood) of more than fifteen inches in diameter or greater.
    - Umbrellularia californica (California bay laurel) with a single stem or multiple stems touching each other at fifty-four inches above natural grade and measuring nine inches in diameter or greater.
- Community of trees;
- Tree designated by the City Council, based upon findings that the particular tree is unique and of importance to the public due to its unusual age, appearance, location or other factors.
- "Significant Tree" means any tree that is eleven inches in diameter (or more), outside of bark, measured at fifty-four inches inches above natural grade. The following trees shall not be classified as significant or heritage trees regardless of size:
    - Bailey, Green or Black Acacia: A. baileyana, A. dedurrens or A. melanoxylon;
    - Tree of Heaven: Ailianthus altissima;
    - Fruit trees of any kind;
    - Monterey Pine: Pinus radiata;
    - Eucalyptus: genera;
    - Monocot trees including palms and palm relatives.

4.2.1.2 *Existing Conditions*

Special Status Species

The project site is currently developed with a one-story commercial building, surface parking lot, and limited ornamental landscaping, and is located within an urbanized area of San Carlos. There are no sensitive habitats or wetlands on or adjacent to the site. Habitats in developed areas, such as

the project site, are low in species diversity and include predominantly urban adapted birds and animals.[13]

Based on a reconnaissance level survey and database review of the project site completed by Live Oak Associates, Inc. in January 2023, the project site provides habitat for common urban adapted animals such as American crow (Corvus brachyrhynchos), Brewer's blackbird (Euphagus cyanocephalus), and house sparrow (Passer domesticus). Other migratory bird species are likely to occur and nest on-site, and typical urban mammals such as racoons (Procyon lotor), opossum (Didelphis virginiana), and feral and domestic cats and dogs are also expected to occur on-site.[14]

While a number of special status plants occur in the vicinity of the project site, these species are not present on the project site due to the lack of suitable habitat. Special status animal species that may have potential to occur on-site include Townsend's big-eared bat, pallid bat, and big free-tailed bat. Although these special status bats may forage over the site, suitable roosting habitat for these species is absent from the site.[15]

Trees

There are a total of 23 trees on and adjacent to the project site, including 18 trees on-site and five trees adjacent to the project site. Of the 23 trees on- and adjacent to the project site, six are considered protected trees. The following table lists the trees identified in the tree survey prepared by Hort Science Bartlett Consulting in March 2023. The location of trees is shown in Figure 4.2-1.

Table 4.2-1: Tree Inventory

Number	Botanical Name	Common Name	Circumference (inches)	Status
131	Pinus thundbergiana	Japanese black pine	72	Protected
132	Liriodendron tulipfera	Tulip tree	31	Not protected
133	Liriodendron tulipfera	Tulip tree	22	Not protected
134	Fraxinus uhdei	Evergreen ash	25	Not protected
135	Fraxinus uhdei	Evergreen ash	60	Protected
136	Pinus radiata	Monterey Pine	50	Not protected
137	Fraxinus uhdei	Evergreen ash	50	Protected
138	Pinus canariensis	Canary Island pine	63	Protected
139	Pinus canariensis	Canary Island pine	50	Protected

[13] Live Oak Associates, Inc. *Biological Technical Report for a project site located at 11 El Camino Real in the City of San Carlos, San Mateo County, California (PN 2759-01).* January 11, 2023.
[14] Ibid.
[15] Ibid.

140	Quercus virginiana	Southern live oak	25	Not protected
141	Quercus virginiana	Southern live oak	19	Not protected
142	Pyrus kawakamii	Evergreen pear	25	Not protected
143	Pistacia chinensis	Chinese pistache	34	Protected
144	Eucalyptus camaldulensis	River red gum	141	Not protected
145	Eucalyptus camaldulensis	River red gum	50	Not protected
146	Pheonix canariensis	Canary Island date palm	88	Not protected
147	Washingtonia robusta	Mexican fan palm	53	Not protected
148	Pheonix canariensis	Canary Island date palm	88	Not protected
149	Quercus agrifolia	Coast live oak	25	Not protected

TREE LOCATION MAP

FIGURE 4.2-1

4.2.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☒	☐
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, 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?	☐	☐	☐	☒

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

As discussed in Section 4.2.1.2 Existing Conditions, the project site is currently developed with minimal ornamental landscaping. Based on the highly urbanized and developed nature of the site, natural communities or habitats for special status plant species are not present and would not be impacted by the project.

There are 23 trees on- and adjacent to the project site. The proposed project would remove all 18 on-site trees and one tree adjacent to the project site. These trees could provide nesting and/or foraging habitat for migratory birds. Migratory birds, like nesting raptors, are protected under the Migratory Bird Treaty Act and CDFW Code Sections 3503, 3503.5, and 3800. The CDFW defines "taking" as causing abandonment and/or loss of reproductive efforts through disturbance. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would constitute a significant impact.

Consistent with City policy and federal regulations, the project would be required to implement the following measures as a Condition of Approval.

Conditions of Approval:

- Avoidance and Inhibition of Nesting. Initiation of construction activities shall be scheduled to avoid the nesting season. Construction activities shall be completed before the start of the nesting season to help preclude nesting. The nesting season for most birds and raptors in the San Francisco Bay Area extends from February 1 through August 31.

- Preconstruction Survey(s). If it is not possible to schedule the initiation of construction activities during the period of September 1 through January 31, then a qualified ornithologist shall conduct a preconstruction survey for nesting raptors and other migratory birds on all trees within 250 feet of the site to identify active bird nests that may be disturbed during project construction. This survey shall be completed no more than fourteen days prior to the initiation of construction activities. During this survey, the ornithologist shall inspect all trees and other possible nesting habitats in and immediately adjacent to the construction areas for nests.

  If the survey does not identify any nesting birds that would be affected by construction activities, no further action is required.

  If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist, in consultation with the California Department of Fish and Wildlife (CDFW) shall designate a construction-free buffer zone (typically up to 50 feet for passerines and up to 250 feet for raptors) to be established around the nest, depending on the location and species, to ensure that no nests of species protected by the MBTA and the CDFW would be disturbed during construction activities. The buffer shall remain in place until a qualified ornithologist has determined that the nest is no longer active.

- Reporting. A final report on nesting birds and raptors, including survey methodology, survey date(s), map of identified active nests (if any), and protection measures (if required), shall be submitted and approved by the City of San Carlos's Community Development Department prior to the start of grading, excavation, or other site disturbance.

Implementation of the above Conditions of Approval would ensure that construction of the project takes place outside of the nesting season, thus avoiding any incidental loss of fertile eggs or

nestlings, or nest abandonment. Alternatively, if demolition and construction cannot be scheduled between September 1 and January 31, the required surveys would identify and protect all active nests within the project's area of effect from being disturbed during construction. For these reasons, the project would not result in significant impacts to nesting birds or any protected species. **(Less than Significant Impact)**

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 CDFW or USFWS?

The project site is located in an urbanized area of San Carlos and does not contain any identified riparian habitat or sensitive natural communities under local or regional policies, or by the CDFW or USFWS. For these reasons, the proposed project would have a less than significant impact on sensitive natural communities. **(Less than Significant Impact)**

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

The nearest wetland is located one mile southeast of the project site at Blair Island. The project site is located within a commercial/residential area and is bordered by parking lots, buildings, roads, residential buildings, and the Caltrain tracks. No areas within or adjacent to the project site contain state or federally protected wetlands; therefore, the proposed project would have no impacts to wetlands. **(No Impact)**

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

The project site is currently developed, and no natural habitats exist on-site that would support endangered, threatened, or special status wildlife species. The project site is not used as a wildlife corridor by any native resident or migratory fish or wildlife species as it does not provide a link between any habitat areas that would support these species. Therefore, the proposed project would not interfere with the movement of any fish and wildlife species. **(No Impact)**

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

As discussed in section 4.2.1.2 Existing Conditions, there are 23 trees on the project site and immediately adjacent to the site. The project would remove 19 trees on- and adjacent to the project site, including six protected trees. The proposed project would plant 54 replacement trees on-site consistent with Municipal Code Section 18.18.070.

The proposed project would meet all applicable tree removal and tree protection guidelines set forth by the City of San Carlos. Therefore, the proposed project would not conflict with any ordinance protecting biological resources and would not result in a significant impact to trees and the community forest. **(Less than Significant Impact)**

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

The project site is not located within the area of an applicable habitat conservation plan or natural community conservation plan, or other approved local, regional, or state habitat conservation plan. **(No Impact)**

4.3 Cultural Resources

The following discussion is based upon a Literature Search prepared by ESA in June 2021. A copy of the Literature Search, which is a confidential report, is on file at the City of San Carlos Department of Community Development and is available upon request with appropriate credentials.

4.3.1 Environmental Setting

4.3.1.1 *Regulatory Framework*

National Historic Preservation Act

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

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the state Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[16]

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

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

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

California Native American Historical, Cultural, and Sacred Sites Act

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

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

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

City of San Carlos 2030 General Plan

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

Policy	Description
LU-12.1	Evaluate historical and cultural resources early in the development review process through consultation with interested parties.
LU-12.2	Foster the preservation, restoration, and compatible reuse of architecturally and/or historically significant structures and sites.
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.

4.3.1.2 *Existing Conditions*

Archaeological Resources

The first known human inhabitants of the San Carlos area were often referred to by the name of their linguistic group, Costanoan, otherwise known as Ohlone. The Ohlone occupied a large territory in the South Bay, including the City of San Carlos. This ethnographic group settled in large

permanent groupings of households, forming large villages and tribal territories known as "tribelets". More specifically, a concentration of Ohlone is believed to have lived in the Carmelita area of San Carlos, which lies in part of the City's planning area. Native American archaeological sites tend to be located near waterways, as well as along ridge tops, midslope hill terraces, alluvial flats, the base of hills, where two vegetation communities meet. San Francisco Peninsula's proximity to both bay and marine resources led to the rapid rise in Native American tribe and tribelet populations. Due to urbanization in San Carlos and San Mateo County, archaeological data are largely missing. However, prehistoric archaeological deposits have been recorded near the banks of Pulgas Creek, consisting of mammal bone and chert flakes. A midden site on the banks of Pulgas Creek was recorded in 1990 and consisted of stone flakes and a possible hammerstone. A majority of the midden site was destroyed during the construction of San Carlos Avenue and nearby residential development.

The project site is located approximately one mile northwest of Bair Island, 0.5 miles northwest of Phelps Slough, 1.1 miles north of Pulgas Creek, and 3.0 miles west of the San Francisco Bay. According to the literature search completed for the project, no archaeological resources have been recorded on- or within 0.25 miles of the project site.[17]

Historic Resources

According to a review of the National Register of Historic Places[18] and the California Historic Resources Inventory,[19] there are two buildings of national and/or state-wide historic significance in the City of San Carlos, the Nathanial Brittan Party House (0.9 miles southwest of the project site) and the Southern Pacific Depot (0.5 miles south of the project site). Neither of these structures is located in the immediate vicinity of the project site. The City's Historic Resource Inventory lists properties that are of historical significance, none of which are located on or near the project site.[20]

The existing one-story commercial building on-site was constructed in 1981 and is not eligible as a historic resource.[21]

[17] ESA. *CHRIS-NWIC Records Search for 11 El Camino Real, San Carlos, San Mateo County, California.* June 1, 2021.
[18] National Parks Service. "National Register of Historic Places, National Register Database and Research." Accessed April 6, 2023. https://www.nps.gov/subjects/nationalregister/database-research.htm
[19] Department of Parks and Recreation, Office of Historic Preservation. "California Historic Resources." Accessed April 6, 2023. https://ohp.parks.ca.gov/listedresources/?view=county&criteria=41
[20] City of San Carlos. *Historical Resources Inventory, City of San Carlos, California.* December 1991.
[21] Arcadis. *Phase I Environmental Site Assessment Report, CVS Pharmacy, 11 El Camino Real, San Carlos, California.* June 7, 2021.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

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

As described in Section 4.3.1.2 Existing Conditions, there are no historic resources on or adjacent to the project site. The existing commercial building on-site was constructed in 1981[22] and is not classified as a historic resource and is not considered eligible for listing on the CRHR, NRHP, or local register. For these reasons, the project would not result in impacts to historic resources.
(No Impact)

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

As noted in Section 4.3.1.2 Existing Conditions, there are no known archaeological resources on the project site. Subsurface soils on-site have been previously disturbed for construction of the existing improvements. Therefore, the site has low archaeological sensitivity. Nonetheless, it is possible that unrecorded cultural resources could be encountered during project grading and excavation. Consistent with General Plan Policies LU-12.1, LU-12.2 and Action LU-12.1, the project would be required to implement the following Conditions of Approval, to avoid impacts to unrecorded archaeological resources, in the event that they are encountered during construction of the project.

Conditions of Approval: The project would implement the following conditions in the event archaeological resources are found during construction.

- In the event archaeological resources are unearthed during ground-disturbing activities, all ground-disturbing activities shall be halted or diverted away from the vicinity of the find so

[22] Arcadis. *Phase I Environmental Site Assessment Report, CVS Pharmacy 11 El Camino Real, San Carlos, California*. June 7, 2021.

that the find can be evaluated. A buffer area of at least 50 feet shall be established around the find where ground disturbing activities shall not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find. Work shall be allowed to continue outside of the buffer area.

- All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards. In anticipation of additional discoveries during construction, Archaeological Sensitivity Training will be carried out by a qualified archaeologist for all personnel who will engage in ground moving activities on the site. Should the newly discovered artifacts be determined to be prehistoric, Native American Tribes/Individuals shall be contacted and consulted, and Native American construction monitoring should be initiated.
- The City shall coordinate with the archaeologist and the applicant to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. If appropriate, the archaeologist may introduce archaeological monitoring on all or part of the site. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.

Implementation of the above Conditions of Approval would ensure that impacts to unknown archaeological resources (if present on-site) would be less than significant. **(Less than Significant Impact)**

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

Subsurface soils on-site have been previously disturbed for construction of the existing improvements. Therefore, the site has low archaeological sensitivity. However, it is possible due to the known prehistoric occupation of the project area that unrecorded human remains could be discovered during ground disturbing construction activities. Consistent with General Plan Policies LU-12.1, LU-12.2 and Action LU-12.1, the project would be required to implement the following Conditions of Approval, to avoid impacts to unknown human remains, in the event that they are encountered during construction of the project.

Conditions of Approval: The project would implement the following measures in the event that human remains are found during construction.

- If human remains are unearthed during construction of the proposed project, the City shall comply with state Health and Safety Code Section 7050.5. The City shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If

the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD).

- After the MLD has inspected the remains and the site, they have 48 hours to recommend to the landowner the treatment and/or disposal, with appropriate dignity, the human remains and any associated funerary objects. Upon the reburial of the human remains, the MLD shall file a record of the reburial with the NAHC and the project archaeologist shall file a record of the reburial with the Northwest Information Center. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Implementation of the above Conditions of Approval would ensure that impacts to unrecorded human remains (if present on-site) would be less than significant. **(Less than Significant Impact)**

4.4 Energy

The following discussion is based upon an Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc. in August 2023. A copy of the Air Quality & Greenhouse Gas Assessment is included as Appendix A to this Initial Study.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

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

Renewables Portfolio Standard Program

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

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2 from the atmosphere through sequestration.

California Building Standards Code

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

legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years.[23] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[24]

California Green Building Standards Code

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

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2026 through 2035. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[25]

Regional and Local

City of San Carlos

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

Policy	Description
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.
LU-8.19	Residential structures shall be designed to be compatible with existing structures in the vicinity, avoid obstructing views from adjacent structures or views of community importance, avoid interference with the right or ability to use solar energy and be consistent with the community design principles.
EM-9.2	Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass.

[23] California Building Standards Commission. "California Building Standards Code." Accessed April 6, 2023. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[24] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed April 6, 2023. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.
[25] California Air Resources Board. "Advanced Clean Cars II." Accessed May 26, 2023. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii

EM-9.3	Emphasize energy conservation in local government housing assistance programs.
EM-9.6	Encourage new private construction and major remodels to be designed to meet or exceed Green Uniform Building Code requirements.

San Carlos Climate Action Plan

The San Carlos Climate Action Plan (CAP), approved by the City in September 2021, is a guiding plan to reduce air pollution emissions from sources across the City and adapt to climate change. The CAP calls for actions to reduce greenhouse gases from energy consumption. The CAP focuses on building efficiency and site design, auto emission reduction, low carbon energy use, alternative, non-automotive travel modes, water conservation, waste reduction, and climate adaptation and resilience.

4.4.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,956.6 trillion British thermal units (Btu) in the year 2020, the most recent year for which this data was available.[26] Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 21.8 percent (1,507.7 trillion Btu) for residential uses, 19.6 percent (1,358.3 trillion Btu) for commercial uses, 24.6 percent (1,701.2 trillion Btu) for industrial uses, and 34 percent (2,355.5 trillion Btu) for transportation.[27] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2021 was consumed primarily by the non-residential sector (60 percent), with the residential sector consuming 40 percent. In 2021, a total of approximately 4,157 GWh of electricity was consumed in San Mateo County.[28]

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

[26] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed March 13, 2023. https://www.eia.gov/state/?sid=CA#tabs-2.
[27] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed March 13, 2023. https://www.eia.gov/state/?sid=CA#tabs-2.
[28] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed March 13, 2023. http://ecdms.energy.ca.gov/elecbycounty.aspx.

renewable sources.[29] [30]

Natural Gas

PG&E provides natural gas services within San Carlos. In 2022, California's natural gas supply came from a combination of in-state production and imported supplies from other western states and Canada.[31] In 2021 residential and commercial customers in California used 33 percent of the state's natural gas, power plants used 0.01 percent, the industrial sector used 33 percent.[32] In 2021, San Mateo County used less than one percent of the state's total consumption of natural gas.[33]

Fuel for Motor Vehicles

In 2022, California produced 122 million barrels of crude oil and in 2019, 19.2 billion gallons of gasoline were sold in California. [34] [35] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in 2021.[36] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.[37] [38]

[29] Peninsula Clean Energy. "Frequently Asked Questions." Accessed March 13, 2023. https://www.peninsulacleanenergy.com/faq/

[30] Peninsula Clean Energy. "Energy Choices." Accessed March 13, 2023. https://www.peninsulacleanenergy.com/faq/

[31] California Gas and Electric Utilities. 2022 *California Gas Report.* Accessed March 13, 2023. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf.

[32] United States Energy Information Administration. "Natural Gas Consumption by End Use. 2021." Accessed March 13, 2023. https://www.eia.gov/state/?sid=CA#tabs-2.

[33] California Energy Commission. "Natural Gas Consumption by County." Accessed March 13, 2023. http://ecdms.energy.ca.gov/gasbycounty.aspx.

[34] U.S. Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." February 28, 2023. https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a

[35] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed February 3, 2021. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

[36] United States Environmental Protection Agency. "The 2022 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." December 2022. https://www.epa.gov/system/files/documents/2022-12/420r22029.pdf

[37] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed March 13, 2023. http://www.afdc.energy.gov/laws/eisa.

[38] United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed March 13, 2023. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in a 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?	☐	☐	☒	☐

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

Construction

Project construction would consume energy during demolition, site preparation, grading, excavation, trenching, and paving; however, the project would not waste or use energy inefficiently. Construction processes are generally designed to be efficient in order to save money. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, as well as maintenance and fuel. Compared to construction in outlying, undeveloped areas, the proposed project would save energy by constructing in an urbanized area that is proximate to roadways, construction supplies, and workers. In addition, construction of the proposed project includes several measures to improve the efficiency of the construction process, including participating in the City's recycling construction and demolition materials program, restricting equipment idling times to five minutes or less, and requiring the project to post signs on-site reminding workers to shut off idling equipment (see Conditions of Approval under Air Quality checklist question c).

Operation

Operation of the proposed project would consume energy for multiple purposes, including building heating and cooling, lighting, and appliance use. Energy would also be consumed by vehicles (e.g., residents, visitors and building management employees, etc.) traveling to and from the project site. The net increase in energy use resulting from the proposed project compared to existing on-site use is summarized in Table 4.4-1.

Table4.4-1: Annual Energy Use of Existing and Proposed Development

	Electricity (kWh)	Natural Gas (kBtu)	Gasoline (gallons)
Existing use	239,259	159,560	181,938
Proposed project	1,449,984	0	82,935
Project Net Increase	**1,210,725**	**(159,560)**	**(99,003)**

Note: The estimated gasoline demand is based on the estimated VMT of 4,621,233 for existing uses and 2,106,540 for the project, and the average fuel economy of 25.4 mpg.

kWh- = kilowatt per hour

kBtu = kilo-British thermal unit

Source: Appendix A

As shown in Table 4.4-1, the project would result in a reduction in natural gas and gasoline demand and an increase in electricity demand compared to existing conditions. The project, however, would not represent a wasteful or inefficient use of energy resources because the project would be required to comply with Title 24 and CALGreen requirements to reduce energy consumption, be all electric and include rooftop solar photovoltaic panels consistent with the City's Reach Code. For these reasons, the project would not result in a wasteful use of energy or conflict with a state or local plan for renewable energy or energy efficiency and impacts would be less than significant. **(Less than Significant Impact)**

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

The project is consistent with the policies described in Section 4.4.1.1 Regulatory Framework. In addition, the proposed project would comply with Title 24 and CALGreen and the green building measures listed above including generating renewable energy on-site from rooftop solar panels. For these reasons, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

4.5 Geology and Soils

The following discussion is based, in part on a Preliminary Geotechnical Investigation prepared for the project by Rockridge Geotechnical, in January 2023 (Appendix D).

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

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

Seismic Hazards Mapping Act

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

California Building Standards Code

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

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of

Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

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

City of San Carlos 2030 General Plan

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

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

City of San Carlos Building Code

Chapter 15.04 of the San Carlos Municipal Code includes the current California Building, Plumbing, Mechanical, Electrical, Existing Building, and Historic Building Codes.

4.5.1.2 *Existing Conditions*

Regional Geology

The geology within San Carlos is mainly unconsolidated sedimentary deposits including sedimentary rock and Franciscan bedrock west of Alameda de las Pulgas.

There are four major soil types in the City from the bay to the hillsides: 1) existing fill overlying unconsolidated Holocene Bay mud deposits; 2) unconsolidated Holocene fine- to coarse-grained alluvial fan and basin deposits with a water table equal to or less than ten feet; 3) weak consolidated Pleistocene fine- to coarse-grained alluvial fan and basin deposits; and 4) colluvial and landslide deposits locally overlying sandstone and bedrock units.

On-Site Geotechnic Conditions

Topography and Soils

The topography of the site is sloped downward to the east toward the Caltrain tracks. The site has an elevation of 34.6 feet above mean sea level (amsl) at El Camino Real and 25.2 feet amsl on the eastern property line. The project site is underlain by a layer of artificial fill in the northern portion of the site and alluvium in the remaining portions of the site. The alluvium on-site is classified as Urban Land Orthents[39] and generally consists of clay and silty clay imbedded with layers of sand and silty sand to a depth of 36 feet bgs. Orthents soil are considered to have low to no potential for expansion.[40] In addition, the geological unit/deposit type of the underlaying soil is designated Pleistocene-age alluvium (Qpa).

Groundwater

Based on the geotechnical study prepared for the project site, groundwater is assumed to occur between 17 feet bgs along the northeastern edge of the site and 25 feet bgs along the southwestern edge of the site.[41]

Seismic and Seismic-Related Hazards

The San Francisco Bay Area is one of the most seismically active regions in the U.S. The significant earthquakes that occur in the Bay Area are generally associated with the crustal movements along well-defined active fault zones of the San Andreas Fault system, which regionally trend in a northwesterly direction. Faults in the region are capable of generating earthquakes of magnitude 6.7 or higher, and strong to very strong ground shaking is expected to occur at the project site during a major earthquake.

[39] USDA. Web Soil Survey. Accessed April 3, 2023. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx
[40] City of San Carlos. Draft 2030 General Plan EIR. Page 4.5-9.
[41] Rockridge Geotechnical. *Preliminary Geotechnical Investigation, Proposed Residential Building, 11 El Camino Real, San Carlos, California.* January 5, 2023.

The project area is not located within the Alquist-Priolo Earthquake Fault Zone and no active faults have been mapped on-site; therefore, the risk of rupture is low.[42] Active faults near the project site are shown in Table 4.5-1 and are described in Appendix D.

Table4.5-1: Active Faults Near the Project Site

Fault	Distance from Site (Miles)
Monte Vista-Shannon	5.8
San Andreas	6.1
San Gregorio	18

Liquefaction

Liquefaction occurs when water-saturated soils lose structural integrity due to seismic activity. Soils that are most susceptible to liquefaction are loose to moderately dense, saturated granular soils with poor drainage. The project site is located adjacent to an area with identified liquefaction hazards, however; the project site is not located within a potential liquefaction hazard zone and was determined to have low potential for liquefaction.[43]

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of flat-lying alluvial material toward an open area, such as a steep bank of a stream channel. Due to the relatively flat grades in the site vicinity, as well as the composition of the soils on-site, the project site would have low potential for lateral spreading.[44]

Landslides

Landslides occur when the stability of a slope changes from a stable to an unstable condition. The site is not located within a San Mateo County Landslide Hazard Zone.[45] The project area is gently sloped and the soils underlaying the project site vary from stiff to hard clay, and medium dense to very dense silty sand.[46] These types of soils are less susceptible to liquefaction resulting in landslides. Therefore, the probability of landslides occurring at the site during a seismic event is low.

Paleontological Resources

Paleontological Resources are fossilized remains of organisms from prehistoric environments from the geologic strata. No paleontological resources have been identified within the City of San Carlos.

[42] Ibid.
[43] Ibid. Page 10
[44] Ibid. Page 10
[45] Ibid. Figure 5
[46] Ibid. Page 3

The project site is situated on Pleistocene-age alluvium deposits,[47] which has the potential to contain significant nonrenewable paleontological resources.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☒	☐
– Strong seismic ground shaking?	☐	☐	☒	☐
– Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
– Landslides?	☐	☐	☒	☐
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 will 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 the current California Building Code, 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 geological feature?	☐	☐	☒	☐

[47] Ibid.

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

Fault Rupture

The project site is not located in an Alquist-Priolo Earthquake Fault Zone. No known surface expression of active faults cross the site (Appendix D). Fault rupture through the site, therefore, is not anticipated. **(Less than Significant Impact)**

Seismic Ground Shaking

The project site is located within the seismically active San Francisco Bay region. The faults in this region are capable of generating earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur at the project site.

In accordance with the California Building Code (CBC), the City's General Plan, and the Municipal Code, and to avoid or minimize potential damage from seismic shaking, the proposed project would be built using standard engineering and seismic safety design techniques. The building design and construction at the site would be completed in conformance with the recommendations of a design-level geotechnical investigation, which would be included in a report to the City. The geotechnical report would be reviewed and approved by the City of San Carlos Building Division as part of the building permit review and issuance process. The structures would be required to meet the requirements of applicable Building and Fire Codes, as adopted or updated by the City. The project would be designed to withstand seismic hazards identified on the site to the extent feasible.

With adherence to the General Plan, CBC, and City Municipal Code as described above, the project would not result in seismic hazards as it would be constructed in accordance with current design and engineering standards. As such, the existing seismic hazards on the project site would not be exacerbated by the project such that it would impact (or worsen) on- or off-site conditions. **(Less than Significant Impact)**

Liquefaction and Lateral Spreading

As discussed under Section 4.5.1.2 Existing Conditions, the project site is located adjacent to an area with liquefaction potential; however, the project site is not located within a liquefaction zone and has low potential for lateral spreading. With adherence to the General Plan, CBC, and City Municipal Code as described above, the project would not expose people or structures to substantial adverse effects due to liquefaction or lateral spreading.

Landslides

The project site is not mapped within a state-designated Landslide Hazard Zone. The project would not change the topography of the site and surrounding area such that the likelihood of a landslide occurring would increase. **(Less than Significant Impact)**

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

The project site is developed and gently sloped, which limits the potential for substantial soil erosion. The potential for erosion is highest during the grading and excavation phase. These activities would increase the potential for erosion from wind or stormwater runoff. As discussed in Section 4.8 Hydrology and Water Quality, the project would be required to adhere to the National Pollutant Discharge Elimination System (NPDES) requirements and the City's Grading Ordinance which ensure that erosion control measures are implemented through the grading and building permit process. Adherence to these existing policies and regulations would ensure that the project would not result in substantial soil erosion or loss of topsoil. **(Less than Significant Impact)**

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

As discussed under checklist question a, the project site is not subject to liquefaction, lateral spreading or landslide hazards. Nonetheless, the project would adhere to the General Plan, CBC, and City Municipal Code by employing standard design and engineering practices and would not expose people or structures to substantial adverse effects due to liquefaction, lateral spreading or landslides. For these reasons, the project would not result in significant impacts associated with being located on an unstable geologic unit. **(Less than Significant Impact)**

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

Expansive soils can affect buildings and structures due to fluctuations in volume when becoming saturated. As noted in Section 4.5.1.2 Existing Conditions, on-site soils have low expansion potential. Nonetheless, the project construction would be completed in accordance with the General Plan, CBC, and City Municipal Code. Adherence to these requirements would reduce any substantial risks of underlying expansive soils. For these reasons, the proposed project would not create substantial direct or indirect risks to life or property due to the expansive soils underlying the site. **(Less than Significant Impact)**

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

The project does not propose the use of a septic tank or other alternative waste-water disposal system. Therefore, there would be no impact. **(Less than Significant Impact)**

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

As noted in Section 4.5.1.2 Existing Conditions, the project site is located on Pleistocene sediments which have the potential to contain paleontological resources. Therefore, it would be possible to encounter unknown paleontological resources during project grading and excavation. Consistent with Public Resources Code Section 21083.2, the project would implement the following Condition of Approval to reduce or avoid impacts to paleontological resources to a less than significant level.

Condition of Approval: The project would implement the following measures to reduce and/or avoid impacts to unknown paleontological resources to a less than significant level.

- In the event that a fossil is discovered during construction of the project, all work on the site will stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. The City shall be notified if any fossils are discovered. Treatment may include preparation and recovery of fossil material so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The project proponent shall be responsible for implementing the recommendations of the paleontologist.

Implementation of the above Condition of Approval would reduce and/or avoid impacts to unknown paleontological resources to a less than significant level. **(Less than Significant Impact)**

4.6 Greenhouse Gas Emissions

The following discussion is based upon an Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc. in August 2023. A copy of the Air Quality & Greenhouse Gas Assessment is included as Appendix A to this Initial Study.

4.6.1 Environmental Setting

4.6.1.1 *Background Information*

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

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

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/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.

4.6.1.2 *Regulatory Framework*

State

Assembly Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

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

Senate Bill 375

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

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050. Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional and Local

2017 Clean Air Plan

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

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The

jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

City of San Carlos 2030 General Plan

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

Policy	Description
EM-7.1	Take appropriate actions to address climate change and reduce greenhouse gas emissions.
EM-7.2	Monitor and participate in federal, state and regional policies and directives relating to climate change and make adjustments to City policies and programs as appropriate.
EM-7.3	Participate in regional, state, and federal efforts to reduce greenhouse gas emissions and mitigate the impacts resulting from climate change.
EM-9.2	Support on-site generation of energy through alternative forms of energy production such as solar panels, wind turbines and biomass facilities.
EM-12.3	Encourage the public and private sectors to utilize reusable, returnable, recyclable, environmentally-friendly products and repairable goods through incentives, educational displays and activities, as well as City purchasing policies and practices.

San Carlos Climate Action Plan

The San Carlos CAP, approved by the City in September 2021, is a guiding plan to reduce air pollution emissions from sources across the City and adapt to climate change. The CAP calls for actions to reduce greenhouse gases from energy consumption. The CAP focuses on building efficiency and site design, auto emission reduction, low carbon energy use, alternative, non-automotive travel modes, water conservation, waste reduction, and climate adaptation and resilience. The San Carlos CAP is a qualified Climate Action Plan consistent with the requirements identified in CEQA Guidelines section 15183.5.

4.6.1.3 *Existing Conditions*

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

The existing commercial use on-site is currently occupied. GHG emissions are generated by automobiles traveling to/from the site and from lighting, heating, and cooling of the existing building.

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) 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 GHGs?	☐	☐	☒	☐

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

Construction Emissions

Construction activities on-site would result in temporary GHG emissions. Construction related GHG emissions vary depending on the level of activity, length of construction period, specific construction operations, types of equipment, and number of personnel. Neither the City of San Carlos nor BAAQMD has established a quantitative threshold or standard for determining whether a project's construction related GHG emissions are significant. Project construction would occur over a period of approximately two years and four months and include use of equipment for grading, excavation, trenching, building construction, and landscaping. Project construction would not result in a permanent increase in emissions since construction-related GHG emissions would cease upon completion of the development.

Operational Emissions

Per CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for careful judgement on the part of the Lead Agency and must be based to the extent possible on scientific and factual data. Since the project is consistent with the General Plan land use designation for the site, planned growth from build out of the General Plan, and incorporates mandatory CAP measures required by the City (refer to checklist question b for detailed discussion of measures implemented), operation of the project would not interfere with the implementation of SB 32 in 2030 and would have a less than significant GHG emissions impact. **(Less than Significant Impact)**

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

San Carlos 2030 General Plan

The project is consistent with the General Plan policies identified in Section 4.6.1.1 Regulatory Framework to reduce GHG emissions by:

- Constructing in accordance with CALGreen Tier 2 standards
- Installing rooftop solar panels on the proposed apartment building

The project would be consistent with the City's General Plan policies intended to reduce GHG emissions.

2030 Climate Action Plan

In April 2022, BAAQMD adopted new CEQA Thresholds for evaluating the significance of climate impacts from land use projects and plans. Pursuant to the latest CEQA Air Quality Guidelines and GHG thresholds of significance, a local government may prepare a Qualified Climate Action Plan that is consistent with AB 32 goals. The City of San Carlos adopted the updated San Carlos CAP in 2021 which sets a numeric emissions reductions target, consistent with statewide AB 32 goals and identifies measures to ensure the City achieves emissions reductions targets. If a project is consistent with the City's CAP, it can be presumed that the project would not have significant GHG emissions under CEQA. The proposed project's consistency with all applicable CAP strategies is summarized below:

Strategy	**Consistency Discussion**
Strategy 1: Regional Energy Conservation and Efficiency Programs. Promote available energy efficiency and conservation opportunities, incentives, and technical assistance for businesses and residents.	The project would be constructed in accordance with CALGreen Tier 2 standards for energy efficiency and include installation of solar panels. The project is consistent with this strategy.
Strategy 4: Electrification. Transition to electricity as the primary energy source citywide.	Consistent with the City's Reach Code Ordinance, the project would be all electric with no natural gas connections. The project would be consistent with this strategy.
Strategy 6: Rooftop solar. Continue to support and increase participation in rooftop and onsite solar energy systems in the community and at City facilities.	As noted above, the project would include installation of rooftop solar panels for on-site renewable energy generation. Therefore, the project is consistent with this strategy.
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.	The project applicant has selected Peninsula Clean Energy as the electricity provider for the proposed project. For this reason, the project is consistent with this measure.

Strategy 8: Battery Storage. Promote installation of small-scale onsite battery energy storage systems for existing and new development, including City facilities.	As noted in Section 3.2.5 Green Building Measures, the proposed project would include small scale on-site battery storage. Therefore, the project would be consistent with this measure.
Strategy 11: Transit Oriented Development. Encourage development of mixed-use projects, higher-density housing, and job growth within the General Plan's recognized Transit-Oriented Development) TOD) corridor (Planning Areas 1, 2, and 3) while being mindful of surrounding uses.	The project site is located within a recognized Transit-Oriented Development corridor (General Plan Planning Area 2) and would construct high-density residential development on-site. Therefore, the project would be consistent with this strategy.
Strategy 12: Active Transportation. Prioritize bicycling and walking as safe, practical, and attractive travel options citywide, as directed by the Bicycle and Pedestrian Master Plan.	As discussed in Section 4.12 Transportation, the project would include 24 short term and 60 long term bicycle parking spaces and would not impede implementation of the City's Bicycle Master Plan. For these reasons, the proposed project is consistent with this measure.
Strategy 17: Vehicle Miles Traveled. Reduce community-wide transportation-related emissions per resident and employee, with an emphasis on reductions from existing and new development in the City's core commercial, office, and industrial areas, including development on the east side.	As discussed in Section 4.12 Transportation, the project would have a less than significant VMT impact under the City's VMT policy due to its location in proximity to existing transit on El Camino Real and the San Carlos Caltrain Station. For this reason, the project would be consistent with this measure.
Strategy 18: Electric Vehicles. Support residents and business owners to transition to electric and plug-in hybrid vehicles.	As discussed in Section 3.2.5 Green Building Measures, the project would include EV charging infrastructure consistent with CALGreen Tier 2 standards. Therefore, the project would be consistent with this standard.
Strategy 21: Carsharing. Promote electric vehicle and low-carbon fuel car-sharing programs.	No carsharing is proposed on-site. However, as discussed in Section 3.2.5 Green Building Measures, the project would include EV charging infrastructure consistent with CALGreen Tier 2 standards. Therefore, the project does not implement this standard.
Strategy 22: Micromobility. Facilitate micromobility options, including low-speed individually owned or shared, human-powered and electric bicycles, scooters, and skateboards, for short trips and last mile commutes.	As discussed in Section 3.2.2 Site Access and Parking, the project would include a total of 84 bicycle parking spaces including 24 short term spaces on El Camino Real and 60 long terms spaces within the building to facilitate micromobility and last mile connections to and from the site. Therefore, the project would be consistent with this measure.
Strategy 27: Construction and Demolition Waste. Increase the amount of waste recycled during construction and demolition of buildings.	As discussed in Section 4.14 Utilities and Service Systems, the project would divert 65 percent of construction waste from landfills consistent with the City's construction waste diversion program. Therefore, the project would be consistent with this strategy.
Strategy 28: Composting and Recycling. Partner with RethinkWaste to expand commercial and multi-family residential recycling and composting programs.	As discussed in Section 4.14 Utilities and Service Systems, consistent with City policies and state requirements, organics waste collection and composting services would be provided for future tenants on-site. Therefore, the project would be consistent with this measure.

Strategy 32: Waterwise Landscaping: promote drought-tolerant and firewise landscaping.	As noted in Section 3.2.5 Green Building Measures, the project would include drought tolerant landscaping and water efficient irrigation systems. Therefore, the project would be consistent with this strategy.
Strategy 36: Open Space Preservation. Preserve open space by supporting urban infill.	The project would replace an existing 28,000 square foot commercial building with 242-unit apartment building on a site surrounded by existing development. The project would be considered an infill project and is consistent with this strategy.
Strategy 37: Heat Island Effect. Minimize the urban heat island effect.	As discussed in Section 3.2 Project Description, all parking would be located within a below grade and/or podium level parking garage, reducing the amount of surface parking on-site. In addition, the project would result in a net increase of 32 trees on-site, increasing shade and vegetation above existing conditions. For these reasons, the project would be consistent with this Strategy.

As discussed in the table above, the project would implement all applicable CAP consistency measures intended to reduce GHG emissions, resulting in a less than significant impact. **(Less than Significant Impact)**

4.7 Hazards and Hazardous Materials

The following discussion is based, in part on a Phase I Environmental Site Assessment and a Limited Phase II Investigation prepared for the project by Arcadis in June 2021 and June 2022, respectively. (Appendix E).

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

Overview

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

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

Federal and State

<u>Federal Aviation Regulations Part 77</u>

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

<u>Comprehensive Environmental Response, Compensation, and Liability Act</u>

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the

environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

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

The law authorizes two kinds of response actions:

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

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[48]

Resource Conservation and Recovery Act

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

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

[48] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed May 11, 2020. https://www.epa.gov/superfund/superfund-cercla-overview.

authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[49]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and state Water Resources Control Board (SWRCB).[50]

Toxic Substances Control Act

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

California Accidental Release Prevention Program

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

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.[51] The EPA is currently considering a proposed ban on on-going use of

[49] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 11, 2020. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[50] California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. https://calepa.ca.gov/sitecleanup/corteselist/.
[51] United States Environmental Protection Agency. "EPA Actions to Project the Public from Exposure to Asbestos." Accessed April 19, 2022. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos

asbestos.[52] National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

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

Regional and Local

San Mateo County Airport Land Use Commission

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

The CLUP requires proposed land use policy changes and land development proposals in the airport vicinity be compatible with continued aircraft operation and public safety. The CLUP designates six safety zones,[53] as shown in Exhibit 4-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.[54] The site is located within Zone 6 – Traffic Pattern Zone.

[52] Ibid.

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

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

Additionally, the CLUP establishes a planning boundary around the airport called the Airport Influence Area (AIA) which is based upon the runway orientation and associated noise impacts of overflight aircraft. The AIA is divided into 2 sections: Area A is the larger boundary encompassing much of San Mateo County; Area B is smaller and located within Area A. The site is located with Area B.

The CLUP includes compatibility criteria and policies for safety, airspace protection, and overflight that apply to designated activities occurring within the airport's safety zones and AIA. To evaluate consistency with safety compatibility criteria, the CLUP Table 4-4 lists land uses that are compatible, conditionally compatible, and incompatible. Additionally, California Public Utilities Code Section 21676 requires San Carlos' and San Mateo County's General Plan land use designations to be in conformance with the land use plans and policies of the CLUP.

The CLUP's Airport Influence Area Policy 2 indicates that any proposed land use policy changes, including development proposals that fall within Area B of the AIA, are required to be reviewed by the CLUP. The multi-family residential use is listed as a compatible use in Table 4-4 Safety Compatibility Criteria of the CLUP.

San Carlos 2030 General Plan

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

Policy	Description
CSS-4.2	Require producers of and users of hazardous materials in San Carlos to conform to all local, state, and federal regulations regarding the production, disposal and transportation of these materials.
CSS-4.3	Mitigate hazard exposure to and from new development projects through the environmental review process, design criteria and standards enforcement.
CSS-4.5	Where deemed necessary, based on the history of land use, require site assessments for hazardous and toxic soil contamination prior to approving development project applications.
CSS-4.9	Encourage the use of green building practices to reduce potentially-hazardous materials in construction materials.
CSS-5.1	Maintain land use and development in the vicinity of San Carlos Airport that are consistent with the relevant airport/land use compatibility criteria and guidelines contained in the adopted Airport/Land Use Compatibility Plan (CLUP) for the environs of San Carlos Airport, including noise, safety, height and avigation easement requirements.

4.7.1.2 *Existing Conditions*

On-site Conditions

Historic and Current Uses of the Project Site

The project site was undeveloped from 1896 to 1943 when the northern portion of the site was developed with four rectangular structures and the southern portion of the site was developed with a portion of a larger building that extended onto the adjacent parcel to the south. By 1950, the northern portion of the site was developed with three one-story buildings used for sign manufacturing, steel plating operations, boat and carpet storage, and for the sale and manufacturing of cabinets. All on-site buildings were demolished between 1970 and 1974. In 1981, the current one-story commercial building was constructed on-site.[55]

On-Site Contamination

Soil samples collected on the project site revealed Chlordane, Aroclor-1260, Cadmium, Cobalt, Lead, Nickel, and Vanadium above their respective environmental screening levels (ESLs) and soil vapor samples contained methylene chloride, benzene, 1,2-Dichloroethane, and Tetrachloroethene (PCE) above their respective ESLs. No groundwater contamination was detected on-site. [56] The project site is included on the State Water Resources Control Board GeoTracker database (a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5) with a cleanup status of "Informational Item/Review Complete as of 4/18/2023". However, this status indicates that a regulatory case is not required.[57]

Surrounding Area Conditions

Historic and Current Uses of Surrounding Properties

The project area was developed with railroad tracks, roads, and small structures to the west and wetland areas to the east from as early as 1896. In 1939, the area east of the project site was filled and several small structures and roads were developed north, south, and west of the site. Between 1943 and 2005, the area surrounding the project site was developed with commercial and industrial uses. By 2005, the adjoining and surrounding properties were developed consistent with the current uses.

Surrounding Sources of Contamination

The following properties in the project vicinity were identified as potential environmental concerns to the project site:

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[55] Arcadis. *Phase I Environmental Site Assessment Report, Summerhill Apartment Communities, CVS Pharmacy, 11 El Camino Real, San Carlos, California*. June 7, 2021.
[56] Arcadis. *Limited Phase II Environmental Site Investigation Memorandum.* June 21, 2021.
[57] State Water Resources Control Board, Geotracker. "Non-Case Information Status Definitions." Accessed August 14, 2023. https://geotracker.waterboards.ca.gov/Non-Case%20Information%20Status%20Definitions.pdf

Name (Location)	Distance to Site	Description
Camino Cleaners (58 El Camino Real)	185 feet southwest, upgradient to the site	The property is listed in the EDR Historical Cleaner, San Mateo County Business Inventory (BI), and Emissions Inventory Data (EMI) databases for generating and recycling waste oil and solvents, and for storing hazardous materials. Although no violations or investigations were recorded, given the duration of dry cleaning operations and the proximity to the site, the historical dry cleaning operations are a recognized environmental condition for the proposed project.
San Carlos Plaza Dry Cleaners (81 El Camino Real)	260 feet southeast and cross gradient to the site	The property is listed in the EDR Historical Cleaner, San Mateo County BI, RCRA-SQG, RCRA NonGen/NLR, FINDS, Drycleaners, CERS, Haznet, and HWTS databases for generation of liquids with halogenated organic compounds. Although no violations or investigations were recorded, given the duration of dry cleaning operations and the proximity to the site, the historical dry cleaning operations are a recognized environmental condition for the proposed project.

Other Hazards

Airports Hazards

The nearest airport to the project site is the San Carlos Airport, approximately 0.74 miles southeast of the project site. The site is within the airport's AIA "B" and within Zone 6 – Traffic Pattern Zone. According to the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport, new residential development is compatible with airport operations in this zone and there are no restrictions for safety reasons.[58] The site is also in the San Carlos Airport's FAR Part 77 Airspace Protection Surfaces, which requires the FAA be notified of a project's building height that penetrates the notification surface area.[59] The FAA imaginary surface area for notification for the site is 155 feet amsl, or approximately 120.4 to 129.8 feet above the existing ground surface the site.[60] In addition, as shown on the San Carlos Airport ALUCP Exhibit 4-4a, the project site is located in an area that requires filing of Form 7460-1 with the FAA for its review and hazard determination.[61]

The project site is 10 miles south of the San Francisco International Airport. The site is within the airport's AIA, however, is not located within any of the safety compatibility zones.[62] The site is not within the San Francisco International Airport's FAR Part 77 Notification Surface Area.[63]

[58] City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.* April 2015. Page 4-16.
[59] Ibid. Exhibit 4-4.
[60] As noted in Section 4.5 Geology and Soils, the project site has an elevation of 34.6 feet above mean sea level (amsl) at El Camino Real and 25.2 feet amsl on the eastern property line.
[61] City/County Association of Governments of San Mateo County, Airport Land Use Commission. *C/CAG Agenda Report, RE Consistency Review – 11 El Camino Real, San Carlos.* May 25, 2023. Page 2.
[62] City/County Association of Governments of San Mateo County. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. July 2012. Exhibits IV-1 and IV-9.
[63] Ibid. Exhibit IV-10.

Wildfire Hazards

The project site is located in an urban area surrounded by existing development that is not near any wildlands that could present a fire hazard. The site is not located within an identified Very High Fire Hazard Severity Zone in a State Responsibility Area or a Local Responsibility Area. [64] [65]

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will 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, 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?	☐	☐	☒	☒

[64] CalFire. San Mateo County State Responsibility Area Fire Hazard Severity Zones. November 21, 2022.
[65] CalFire. San Mateo County Local Responsibility Area Fire Hazard Severity Zones. November 24, 2008.

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

Construction of the proposed project would involve the use of materials that are generally regarded as hazardous, such as gasoline, hydraulic fluids, paint, and other similar materials. Operation of the proposed residential building would include the use and storage of cleaning supplies and maintenance chemicals in small quantities by future residents. No other hazardous materials would be used or stored on-site. In accordance with federal and state law, the project would be required to disclose hazardous materials handled at reportable amounts. The small quantities of cleaning supplies and materials used for project operation would not pose a risk to site users or adjacent land uses. **(Less than Significant Impact)**

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

As described in Section 4.7.1.2 Existing Conditions, the existing one-story commercial building was constructed in the early 1980s and is currently occupied by a drug store. Because the existing building was constructed after the ban on asbestos containing materials and lead based paint, these hazardous materials are not anticipated to be present on-site. Similar to most locations in the Bay Area, historic uses of the site have resulted in soil contamination. Soil and soil vapor sampling completed for the proposed project detected Chlordane, Aroclor-1260, Cadmium, Cobalt, Lead, Nickel, and Vanadium in the soil and methylene chloride, benzene, 1,2-Dichloroethane, and Tetrachloroethene (PCE) in on-site soil vapor above their respective ESLs. Ground disturbing activities associated with the proposed project could, therefore, expose construction workers and adjacent properties to existing sources of contamination on-site. For these reasons, consistent with County Environmental Health Department comments and Municipal Code Section 18.15.050 requirements, the project would implement the following Conditions of Approval to address existing on-site soil and soil vapor contamination.

Conditions of Approval: The project applicant shall implement the following measures to reduce impacts to construction workers, adjacent properties, and future residents from existing on-site soil and soil vapor contamination.

- A Site Management Plan (SMP) and Health and Safety Plan (HSP) shall be prepared by the project contractor and submitted to San Mateo County Department of Environmental Health for review and approval prior to the issuance of grading permits. The SMP and HSP shall include the following:
    - Site control procedures to control the flow of personnel, vehicles, and materials in and out of the construction site;
    - Measures to minimize dust generation, stormwater runoff, and tracking of soil off-site;

- If excavation de-watering is required, protocols to evaluate water quality and discharge/disposal options;
- Protocols for completing earthwork activities in areas where impacted soils, soil vapor, and/or groundwater are present or suspected;
- Worker training requirements, health and safety measures, and soil-handling procedures;
- Protocols to be implemented if buried structures, wells, debris, or unidentified areas of impacted soil are encountered during construction;
- Protocols to evaluate the quality of soil suspected of being contaminated so that appropriate mitigation, disposal, or reuse options can be determined; and
- Procedures to evaluate and document the quality of any soil imported to the construction site.

- If required by the San Mateo County Department of Environmental Health, the project shall incorporate a vapor barrier beneath potential conduits (stairwells, elevator shafts, trash chutes) within the proposed apartment building to protect future occupants.

Through adherence to the Conditions of Approval above, on-site soils and soil vapor would be handled and disposed of in a safe manner. Therefore, the proposed project would not result in exposure to hazardous materials during construction or long-term upon project occupancy. **(Less than Significant Impact)**

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

There are no schools within one quarter mile of the site. The nearest school to the site is Arundel Elementary School located at 200 Arundel Road, approximately 0.68 miles west of the project site. Given the distance of the site from surrounding schools, the project would not have a hazardous materials impact on nearby schools. **(No Impact)**

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

As noted in Section 4.7.1.2 Existing Conditions above, the project site is listed on the Cortese List.[66] However, the site has a cleanup status of "Informational Item/Review Complete as of 4/18/2023" which indicates that there is no need for a regulatory case.[67] Therefore, the project would not create a significant hazard to the environment. **(Less than Significant Impact)**

[66] CalEPA. Cortese List Data Resources. Accessed April 4, 2023. https://calepa.ca.gov/sitecleanup/corteselist.
[67] State Water Resources Control Board, Geotracker. "Non-Case Information Status Definitions." Accessed August 14, 2023. https://geotracker.waterboards.ca.gov/Non-Case%20Information%20Status%20Definitions.pdf

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

As described in Section 4.7.1.2 Existing Conditions, the site is within the San Carlos Airport's AIA "B" and its FAR Part 77 Notification Surface Area.[68] Any structure proposed exceeding 155 feet amsl, or approximately 120.4 to 129.8 feet above the existing ground surface must be submitted to the FAA for airspace safety review.[69] In addition, the project site is located in an area that requires filing of Form 7460-1 with the FAA for its review and hazard determination.[70] Consistent with the ALUCP for San Carlos Airport, form 7460-1 was filed and notification of the project was sent to the FAA. On June 5, 2023, the FAA issued a Determination of No Hazard to Air Navigation for the project.[71]

As described in Section 4.7.1.2 Existing Conditions, the project site is within the San Francisco International Airport's AIA. The site, however, is not located within any of its safety compatibility zones established in the CLUP. In addition, the site is not within the San Francisco International Airport's Part 77 Notification Surface Area.

The project site is not located within any of the San Carlos Airport's Aircraft Noise contours.[72] Therefore, as discussed in Section 4.10 Noise, the project would not result in excessive noise for people residing or working in the project area.

For the reasons discussed above, the project would not result in a safety hazard or excessive noise for people residing or working in the project area. **(Less than Significant Impact)**

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

The project would not interfere with the emergency operations within the City since the proposed residential building would be an infill development that would not result in closure, rerouting, or substantial alteration of streets or property access points during or after construction. All construction and construction staging would occur within the project site. In addition, the project would be constructed in accordance with current building and fire codes to ensure structural stability and safety in the event of a seismic or seismic-related hazard. In addition, the Redwood

[68] City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*. April 2015.
[69] As noted in Section 4.5 Geology and Soils, the project site has an elevation of 34.6 feet above mean sea level (amsl) at El Camino Real and 25.2 feet amsl on the eastern property line.
[70] City/County Association of Governments of San Mateo County, Airport Land Use Commission. *C/CAG Agenda Report, RE Consistency Review – 11 El Camino Real, San Carlos*. May 25, 2023. Page 2.
[71] Federal Aviation Administration, Southwest Regional Office, Obstruction Evaluation Group. *Determination of no Hazard to Air Navigation,* June 5, 2023.
[72] City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*. April 2015. Exhibit 4-2.

City Fire Department would review the site development plans to ensure fire protection design features are incorporated. For these reasons, the proposed project would not impair implementation of or physically interfere with the City's emergency response or evacuation plans. **(Less than Significant Impact)**

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

The project site is not located within a Fire Hazard Severity Zone as designated by the state of California Department of Forestry and Fire Protection. **(No Impact)**

4.8 Hydrology and Water Quality

4.8.1 Environmental Setting

4.8.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the San Francisco Bay RWQCB.

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.[73]

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk

[73] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed September 2, 2022. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[74] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flow controlled reservoir, or, in a catchment that drains to channels that are tidally influenced; or

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

(3) the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).[75]

Due to the date of the project's SB330 application (application was submitted on March 15, 2023), the project is subject to prior, 2015 MRP.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.[76] Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit. Single-family residential and wood frame structures are exempt.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

City of San Carlos 2030 General Plan

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

Policy	Description
EM-5.1	Reduce the discharge of toxic materials into the City's sanitary sewer and stormwater collection system by promoting the use of Best Management Practices (BMPs).
EM-5.7	Encourage site designs that manage the quantity and quality of Stormwater runoff.
EM-5.10	Require the evaluation of potential groundwater depletion that could occur from new development through dewatering.

[75] The Hydromodification Applicability Maps developed the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

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

San Carlos Municipal Code

The Municipal Code contains water-efficient landscaping design guidelines, grading and excavation guidelines, stream development and maintenance provisions, and flood damage prevention guidelines. Under the Municipal Code, no development shall occur without full compliance with the terms set forth in the Municipal Code and other applicable regulations. Additionally, developers must submit a copy of the Notice of Intent to the State and obtain a Waste Discharge Identification (WDID) number, and provide the state issued WDID number to the City before issuance of grading or building permits. A summary of pertinent water quality codes and provisions are listed below.

- Section 13.14.070: Discharge—Pollutants. The discharge of non-stormwater discharges to the City storm sewer system is prohibited. All discharges of material other than stormwater must be in compliance with a NPDES permit issued for the discharge (other than NPDES permit No. CA0029921, which formed the San Mateo Countywide Stormwater Pollution Prevention Program) and the ordinance codified in this chapter (Ord. 1149 § 1 (II1), 1994), Section 13.14.110: Reduction of Pollutants in Stormwater. Any person engaged in activities that will or may result in pollutants entering the city storm sewer system shall undertake all practicable measures to reduce such pollutants. The following minimal requirements shall apply:
    - Littering. Littering that might result in pollutants transported to water bodies and discharge of pollutants directly into water bodies is prohibited.
    - Standard for Parking Lots and Similar Structures. Owners or operators must keep surfaces clean to prevent pollutant discharges into the City's storm sewer system.
    - Best Management Practices for New Developments and Redevelopments. Contractors must provide filter materials to prevent debris from flowing into the drainage system.
    - Compliance with Best Management Practices. Owners or operators must comply with best management practices set forth by the City.
- Section 13.14.120: Watercourse Protection. Provides for all watercourses to be kept and maintained reasonably free of potential pollutants and flow constrictions, and for maintenance and non-removal of healthy bank vegetation. (Ord. 1149 § 1 (II 5), 1994)

2018 Groundwater Basin Assessment Report

In 2018 a groundwater basin assessment report was prepared for the San Mateo Plain Groundwater Subbasin. The report identified that the San Mateo Plain Subbasin is not a highly used basin because the majority of drinking water is provided to jurisdictions in this area by San Francisco Public Utility Commission, with the exception of two small water systems in East Palo Alto (Palo Alto Park Mutual and O'Connor Coop) that rely upon groundwater for drinking exclusively. As of 2018, approximately 2,300 acre-feet of groundwater are pumped from the basin annually and the basin is classified as a very low priority basin according to the Sustainable Groundwater Management Act.[77]

[77] County of San Mateo. *San Mateo Groundwater Basin Assessment.* July 2018. Page ES-12.

Because only medium and high priority Sustainable Groundwater Management Act basins are required to submit a Groundwater Sustainability Plan, no such plan has been prepared for the San Mateo Groundwater Subbasin.

4.8.1.2 *Existing Conditions*

Hydrology and Drainage

The City of San Carlos is divided into five major watersheds—Cordilleras Creek, Brittan Creek, Pulgas Creek, Lower Pulgas Creek, and Belmont Creek. The project site is located within the West Redwood Shores Drainage Basin.[78]

The San Carlos storm drain system is operated and maintained by the City. The storm drain system is comprised of catch basins, manholes, pipes, conveyance channels, creeks, ditches, pump stations, and overland flow on streets. In general, stormwater in the City drains from the residential areas in the hills at the west side of the City, then flows east towards the commercial areas to the San Francisco Bay via four outfalls. Stormwater is conveyed to the Bay via open ditches and pipelines into the City's four primary creeks: Belmont, Brittan, Cordilleras, and Pulgas.[79] The project site consists of an existing commercial building and impervious parking lot. Runoff from the site flows into a storm drain in the adjacent parcel to the south, where it connects to the City's storm drain facilities located in El Camino Real.

The City has experienced periodic flooding due to storm drain inlet blockages from leaves and debris, stormwater volumes that are greater than the capacity of the City storm drain system, and backwater and overtopping from creeks. In addition, the eastern portion of the City is mostly flat and at low ground elevation relative to the Bay. As a result, the area is subject to tidal influences and sedimentation.

The project site is currently developed with approximately 88,862 square feet of impervious surfaces (92 percent) and approximately 6,970 square feet (eight percent) of pervious surfaces. Due to the high level of existing development on-site, the project site is not used for groundwater recharge purposes.

Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as "non-point" source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. The health of the watersheds in San Carlos is typical of urbanized areas. Upland sections of the creeks tend to have less pollution while urbanized portions

[78] City of San Carlos. Citywide Storm Drain System Master Plan. April 2017. Figure 4.1. Accessed April 4, 2023. https://www.cityofsancarlos.org/home/showpublisheddocument/2484/636658819040270000
[79] City of San Carlos. Citywide Storm Drain System Master Plan. April 2017. Date accessed: August 3, 2021. https://www.cityofsancarlos.org/home/showpublisheddocument/2484/636658819040270000

of the waterways contain contaminants. Various contaminants have been identified in San Carlos creeks including polychlorinated biphenyls (PCBs), which can persist in the tissues of animals found in the creeks, as well as ultimately pollute the Bay. Water from local watersheds is not used for drinking in San Carlos.

Groundwater

The City is located within the San Mateo Subbasin of the Santa Clara Valley Groundwater Basin. The San Mateo Subbasin is bounded by the Westside Basin to the north, San Francisco Bay to the east, San Francisquito Creek to the south and the Santa Cruz Mountains to the west. Groundwater at the project site is present at approximately 25 feet bgs along the southwestern edge of the site to 17 feet bgs along the northeastern edge of the site.[80]

Flooding and Other Hazards

Based on the FEMA Flood Insurance Rate Maps (Map 06081C0169G), the project site is located in Flood Zone X.[81] Flood Zone X indicates an area of minimal flood hazard, outside the 500-year flood hazard area and protected by levees from 100-year floods.[82]

A seiche is defined as a standing wave generated by rapid displacement of water within an enclosed body of water (such as a reservoir, lake, or bay) due to an earthquake that triggers land movement within the water body or landsliding into or beneath the water body. According to the General Plan, there are no identified areas within the City that could be affected by seiche.[83]

A tsunami is a large tidal wave caused by an underwater earthquake or volcanic eruption. Tsunamis affecting the Bay Area can result from offshore earthquakes within the Bay Area. Tsunami inundation maps for San Mateo County show that the project site is not within a tsunami inundation area.[84]

[80] Rockridge Geotechnical. *Preliminary Geotechnical Investigation Proposed Residential Building 11 El Camino Real San Carlos, California.* January 5, 2023.
[81] Federal Emergency Management Agency. Flood Insurance Rate Map, Community Panel No. 06081C0169G Map. Effective Date: April 5, 2019.
[82] Federal Emergency Management Agency. "Zone C or X (Unshaded)." Accessed April 27, 2023. https://www.fema.gov/glossary/zone-c-or-x-unshaded#:~:text=Zone%20X%20is%20the%20area,levee%20from%20100%E2%80%90%20year%20flood.
[83] City of San Carlos. *City of San Carlos 2030 General Plan EIR*. June 25, 2009. Page 4.7-19.
[84] California Department of Conservation. *San Mateo County Tsunami Hazard Areas*. Date accessed: April 4, 2023. https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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:	☐	☐	☒	☐
– result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Construction Impacts

Construction activities (e.g., grading and excavation) on the project site may result in temporary impacts to surface water quality. When disturbance of underlying soils occurs, the surface runoff that flows across the site may contain sediments that are discharged into the storm drainage system. Construction of the proposed project would disturb the entire approximately 2.2 acres of the project site. Since construction of the project would disturb more than one acre of soil, the project would be required to comply with the NPDES General Permit for Construction Activities. Because the project would include replacement of more than 10,000 square feet of impervious surfaces, the project would also be subject to the requirements of the RWQCB MRP. All development projects in San Carlos are required to comply with the City's Grading Ordinance. The City of San Carlos Grading Ordinance requires the use of erosion and sediment controls to protect water quality while a site is under construction. Compliance with these state and local policies and requirements would ensure that project construction would not result in significant construction-related water quality impacts.

Post-Construction Impacts

Construction of the project would replace more than 10,000 square feet of existing impervious surface area; therefore, it is considered a regulated project under Provision C.3 of the MRP. As such, a combination of numerically sized low impact development stormwater treatment areas and special project media filtration vaults would be installed to satisfy all stormwater treatment requirements. The proposed project would reduce peak design flows and the rate of stormwater runoff into the City's existing 24-inch storm drain line within the neighboring public parcel to the east of the project site. Therefore, the project would not violate waste discharge requirements.

For the reasons discussed above, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

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

As discussed in Section 3.2.6 Construction, construction of the project would include excavation to a maximum depth of 16 feet bgs and drilling to a maximum depth of 30 feet bgs for the proposed soil reinforcement system. Groundwater is present approximately 25 feet bgs along the southwestern edge of the site to 17 feet bgs along the northeastern edge of the site, therefore, temporary dewatering would be required during excavation and would cease once the soil reinforcement system is installed. No permanent dewatering is proposed. As discussed under checklist question a

above, the project would be required to implement NPDES Construction General Permit standard measures to prevent impacts to surface and groundwater quality. Construction dewatering would result in a temporary reduction in groundwater levels at the project site. Due to the temporary nature, dewatering during construction is not considered a substantial decrease in groundwater supplies.

As noted under Section 4.8.1.2 above, the project site is currently developed and is not used for groundwater recharge. The proposed residential project does not include installation of new groundwater wells and would not be located on or adjacent to a groundwater recharge facility, such that operation of the project would deplete groundwater supplies. For these reasons, development of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede implementation of a sustainable groundwater management plan. **(Less than Significant Impact)**

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

Construction of the project would replace an existing commercial building with an apartment building on a site that is not within a designated special flood hazard area. There are no waterways on or adjacent to the project site.

Development of the proposed project would decrease the total impervious surface area of the project site from approximately 88,862 square feet to approximately 85,378 square feet, a reduction of approximately 3,484 square feet below existing conditions on-site. Thus, the project would not increase the amount of runoff generated at the project site. Additionally, as discussed under checklist question a above, the project would include a combination of numerically sized low impact development stormwater treatment areas and special project media filtration vaults to satisfy all stormwater treatment requirements. The proposed project would reduce peak design flows and the rate of stormwater runoff into the City's existing 24-inch storm drain line within the neighboring public parcel to the east of the project site. For these reasons, the proposed project would not result in substantial erosion and siltation on and off-site and would not substantially increase the rate or amount of runoff in a manner that would result in flooding on- or off-site. In addition, the proposed project would not create or contribute to runoff water exceeding the capacity of the City's existing and planned storm drainage system. For these reasons, the impact would be less than significant. **(Less than Significant Impact)**

d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

As noted in Section 4.8.1, Environmental Setting, the project site is not located in a designated flood zone. The nearest special flood hazard area is located east of the Caltrain tracks, approximately 100 feet east of the project site. Furthermore, the project site is not located within a designated tsunami or seiche inundation zone due to its location approximately three miles from San Francisco Bay. The proposed project would, therefore, not risk the release of pollutants due to project inundation from a flood, tsunami, or seiche. **(Less than Significant Impact)**

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

As noted in Section 4.8.1.2 Existing Conditions above, there is no adopted sustainable groundwater management plan for the San Mateo Plain Subbasin. The proposed residential development would connect to the existing City water supply and would not use groundwater. Therefore, implementation of the proposed project would not conflict with such a plan.

As discussed in checklist questions a and b, the proposed residential project would be required to comply with Provision C.3 of the RWQCB MRP requirements. Adherence to these policies and regulations would, therefore, ensure that the project would not conflict with the RWCQB Basin Plan. **(Less than Significant Impact)**

4.9 Land Use and Planning

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Regional and Local

Santa Mateo County Airport Land Use Commission

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

The CLUP requires proposed land use policy changes and land development proposals in the airport vicinity be compatible with continued aircraft operation and public safety. The CLUP designates six safety zones,[85] as shown in Exhibit 4-3 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.[86] The site is located within Zone 6 – Traffic Pattern Zone.

Additionally, the CLUP establishes a planning boundary around the airport called the Airport Influence Area (AIA) which is based upon the runway orientation and associated noise impacts of overflight aircraft. The AIA is divided into 2 sections: Area A is the larger boundary encompassing much of San Mateo County; Area B is smaller and located within Area A. The site is located with Area B.

The CLUP includes compatibility criteria and policies for safety, airspace protection, and overflight that apply to designated activities occurring within the airport's safety zones and AIA. To evaluate

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

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

consistency with safety compatibility criteria, the CLUP Table 4-4 lists land uses that are compatible, conditionally compatible, and incompatible. Additionally, California Public Utilities Code Section 21676 requires San Carlos' and San Mateo County's General Plan land use designations to be in conformance with the land use plans and policies of the CLUP.

The CLUP's Airport Influence Area Policy 2 indicates that any proposed land use policy changes, including development proposals that fall within Area B of the AIA, are required to be reviewed by the ALUC. Multi-family residential uses is listed as a compatible use in Table 4-4 Safety Compatibility Criteria of the CLUP.

San Carlos 2030 General Plan

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

Policy	Description
EM-11.1	Encourage and support maximum allowable density Transit Oriented Development projects within Planning Areas 1, 2, and 3.
LU-1.2	Encourage development of higher density housing and support additional job growth within the TOD corridor while being sensitive to surrounding uses.
LU-1.3	Ensure that development within the TOD corridor maintains and improves the mobility of people and vehicles along and across the corridor.
LU-1.5	Support land use patterns in the TOD corridor that will attract and serve riders of public transit.
LU-1.6	Consider reducing parking requirements for multi-family residential and mixed-use projects within the TOD corridor. Reduced parking requirements may be permitted only if a parking study is submitted demonstrating that the reduced parking is adequate to accommodate on-site parking demand associated with the project.
LU-3.9	Promote development opportunities for regular physical activity by locating residential development near services.
LU-7.4	Respect the visual prominence of important city landmarks, gateways and destinations.
LU-7.5	Consider the inclusion of public art as part of development projects.
LU-8.1	Require all development to feature high quality design that enhances the visual character of San Carlos.
LU-8.2	Ensure that new development is sensitive to the character of adjacent structures and the immediate neighborhood.
LU-8.20	Require all new residential multi-family residential, commercial and industrial projects subject to design review by the appropriate decision making body for compliance with site planning, architecture, signing and landscaping criteria prior to approval.
LU-9.9	Encourage the design of development to minimize the obstruction of significant views of the San Francisco Bay, the western hills, or other significant natural vistas to the greatest extent possible.
LU-11.1	Require high quality design for buildings at visually significant locations in gateway areas.
LU-11.2	Encourage design features, such as landscaping, art and displays in gateway areas that are welcoming, attractive and contribute to a unique sense of place.

LU-11.3	Encourage distinctive architectural features, such as tower elements or a plaza at building entry, for buildings located at visually significant locations within gateway areas.
LU-11.4	Ensure that building placement, frontage treatments and landscaping enhance the pedestrian experience and increase accessibility within gateway areas.
LU-11.5	Limit the visibility of surface parking within gateway areas through landscaping and architectural treatments such as low decorative walls or trellises.
LU-11.6	Discourage the use of sound walls within gateway areas. If sound walls cannot be avoided, ensure that soundwalls are designed to be attractive and well landscaped.
LU-11.8	Please a special emphasis on the preservation of architecturally significant buildings within gateway areas.
LU-12.1	Evaluate historical and cultural resources early in the development review process through consultation with interested parties.
LU-12.5	Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

City of San Carlos Municipal Code

Title 18 of the City's Municipal Code includes the City's Zoning Ordinance. The Zoning Ordinance serves as an implementing tool for the General Plan by establishing detailed, parcel-specific development regulations and standards in each area of the City.

4.9.1.2 *Existing Conditions*

Project Site

General Plan Land Use Designation

The project site is designated Mixed-Use 90-120 DUs/AC in the City's General Plan. The Mixed-Use, High Density land use designation is intended for both commercial and multi-family dwellings at densities of up to 120 units per acre.

Zoning

The project site is zoned Mixed-Use North Boulevard (MU-NB-120) in the San Carlos Municipal Code. The MU-NB-120 zoning district is intended to facilitate the transformation of the northern portion of El Camino Real into a multi-modal, mixed-use corridor. This district allows a mix of residential development of up to 120 units per net acre and retail and commercial uses, as well as hotels and other commercial uses oriented toward a regional market.

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Examples of projects that have the potential to physically divide an established community include new freeways and highways, major arterial streets, and railroad lines. The project would include construction of a new residential building and landscaping on an infill site. The proposed uses are allowed under the existing Mixed-Use, High Density land use designation and MU-NB-120 zoning and would not include construction of dividing infrastructure. The project site is located in a neighborhood with similar uses, and therefore, implementation of the project would not physically divide an established community. For these reasons, impacts would be less than significant. **(Less than Significant Impact)**

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

The Mixed-Use 90-120 DUs/AC General Plan land use designation for the site allows for high density residential development with densities of up to 120 dwelling units per acre. The MU-NB-120 zoning allows for residential and residential/commercial mixed-use development and Municipal Code Section 18.05.020 (D) allows buildings with a maximum height of up to six stories tall.

The project proposes development of a 242 unit, six-story residential building with a density of 110 units per acre and a maximum height of approximately 82 feet on-site. As noted in Section 2.7 Project-Related Approvals, Agreements, and Permits, the project applicant is requesting waivers from the following development standards under the State Density Bonus law for the building height (82 feet is proposed where 79 feet is currently allowed), FAR (project proposes an FAR of 3.27 where 3.0 FAR is allowed), building length (project proposes building length of 367 feet where 125 feet is allowed) and architectural design details (large, continuous roof planes are prohibited and window trim and recess standards are imposed which the project cannot fully satisfy). Therefore, the proposed project would be consistent with the current General Plan land use designation and zoning for the site.

Furthermore, with the implementation of applicable General Plan policies and Conditions of Approval identified throughout this Initial Study, the project would not result in a significant environmental effect due to a conflict with a land use plan or policy. The project is located within the San Carlos Airport's AIA "B" and its FAR Part 77 Notification Surface Area[87] and within the San Francisco International Airport's AIA. The proposed 82-foot-tall building would not penetrate the San Carlos Airport notification surface area requirements for the site (120.4 to 129.8 feet above the existing ground surface the site). However, consistent with the San Carlos ALUCP, Form 7460-1 was filed and notification of the project was sent to the FAA. On June 5, 2023, the FAA issued a Determination of No Hazard to Air Navigation for the project.[88] In addition, the project site is not located within any of the safety compatibility zones established in the San Francisco International Airport CLUP and is not located within the San Francisco International Airport's Part 77 Notification Surface Area. For these reasons, the project would not conflict with an adopted land use plan, policy, or regulation adopted for avoiding or mitigating an environmental effect and impacts would be less than significant. **(Less than Significant Impact)**

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

[88] Federal Aviation Administration, Southwest Regional Office, Obstruction Evaluation Group. *Determination of no Hazard to Air Navigation,* June 5, 2023.

4.10 Noise

The following discussion is based, in part on a Noise and Vibration Assessment prepared for the project by Illingworth & Rodkin, Inc. in August 2023. This report is included as Appendix F to this Initial Study.

4.10.1 Environmental Setting

4.10.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[89] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

[89] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

4.10.1.2 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.11-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table4.10-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	**Occasional Events**	**Infrequent Events**
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83
Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual.* September 2018.			

State and Local

California Green Building Standards Code

For commercial uses, CALGreen (Section 5.507.4.1 and 5.507.4.2) requires that wall and roof-ceiling assemblies exposed to the adjacent roadways have a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the commercial property falls within the 65 dBA L_{dn} or greater noise contour for a freeway or expressway, railroad, or industrial or stationary noise source. The state requires interior noise levels to be maintained at 50 dBA $L_{eq(1\text{-}hr)}$ or less during hours of operation at a proposed commercial use.

As previously discussed in Section 4.9.1.1, the San Carlos CLUP ensures the safety of airport operations. According to the CLUP's Exhibit 4-1 Existing Conditions (2013) Aircraft Noise Contours, the project site is not located within any noise contours of the San Carlos Airport. [90]

[90] San Carlos Airport Land Use Compatibility Plan. Exhibit 4-1 Existing Conditions (2013) Aircraft Noise Contours. October 2015.

San Carlos 2030 General Plan

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

Policy	Description
NOI-1.2	Minimize noise impacts on noise-sensitive land uses. Noise-sensitive land uses include residential uses, retirement homes, hotels/motels, schools, libraries, community centers, places or public assembly, daycare facilities, churches and hospitals.
NOI-1.3	Limit noise impacts on noise-sensitive uses to noise level standards as indicated in Table 6-1.
NOI-1.4	Require a detailed acoustic report in all cases where noise-sensitive land uses are proposed in areas exposed to exterior noise levels of 60 CNEL Ldn or greater. If recommended in the report, mitigation measures shall be required as conditions of project approval.
NOI-1.5	New development of noise-sensitive land uses proposed in noise-impacted areas shall incorporate effective mitigation measures into the project design to reduce exterior and interior noise levels to the following acceptable levels: a. For new single-family residential development, maintain a standard of 60 Ldn (day/night average noise level) for exterior noise in private use areas. b. For new multi-family residential development maintain a standard of 65 Ldn in community outdoor recreation areas. Noise standards are not applied to private decks and balconies and shall be considered on a case-by-case basis in the downtown core. c. Interior noise levels shall not exceed 45 Ldn in all new residential units (single- and multi-family). Development sites exposed to noise levels exceeding 60 Ldn shall be analyzed following protocols in Appendix Chapter 12, Section 1208, A, Sound Transmission Control, 2001 Building Code Chapter 12, Appendix Section 1207.11.2 of the 2007 California Building Code (or the latest revision). d. Where new residential units (single- and multi-family) would be exposed to intermittent noise levels generated during train operations, maximum railroad noise levels in side homes shall not exceed 50 dBA in bedrooms or 55 dBA in other occupied spaces. These single event limits are only applicable where there are normally four or more trains per day.
NOI-1.6	Where noise mitigation measures are required to achieve the noise level standards, the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers shall be considered after practical design-related noise mitigation measures have been integrated into the project.
NOI-1.7	The City shall seek to reduce impacts from ground-borne vibration associated with rail operations by requiring that vibration-sensitive buildings (e.g., residences) are sited at least 100 feet from the centerline of the railroad tracks whenever feasible. The development of vibration-sensitive buildings within 100 feet from the centerline of the railroad tracks would require a study demonstrating that ground borne vibration issues associated with rail operations have been adequately addressed (i.e., through building siting, foundation design and construction techniques).
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.
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 "quieter" pavement surfaces when resurfacing roadways.

NOI-1.11	Ensure that proposed noise sensitive land uses include appropriate mitigation to reduce noise impacts from aircraft operations at San Carlos Airport. Work with the San Carlos Airport Pilots Association and San Mateo County to continue to refine and implement the Airport's noise abatement procedures.
NOI-1.12	Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan.
NOI01.14	The Federal Transit Administration vibration impact criteria and assessment methods shall be used to evaluate the compatibility of train vibration with proposed land uses adjoining the UPRR (Caltrain) corridor. Site specific vibration studies shall be completed for vibration-sensitive uses proposed within 100 feet of active railroad tracks.
CSS-5.1	Maintain land use and development in the vicinity of San Carlos Airport that are consistent with the relevant airport/land use compatibility criteria and guidelines contained in the adopted Airport/Land Use Compatibility Plan for the environs of San Carlos Airport, including noise, safety, height and avigation easement requirements.

City of San Carlos Municipal Code

Chapter 9.30 of the San Carlos Municipal Code includes provisions for the peace, health, and safety of its citizens from unnecessary and excessive noises. The City's Noise Control Ordinance 1086 specifies that unreasonable noise is that which exceeds 10 dBA above local ambient noise levels. Construction noise is exempt from the San Carlos noise limits and is permitted from 8:00 AM to 5:00 PM Monday through Friday and from 9:00 AM to 5:00 PM on Saturday and Sunday. Gas-powered construction equipment shall be equipped with manufacturer-supplied operating muffler or baffling systems.

Chapter 18.21 of the San Carlos Municipal code defines the performance standards to limit and permit the occurrence of nuisances, hazards, and objectionable conditions. Maximum allowable noise limits and noise exposure limitations are specified for different land uses.

4.10.1.3 *Existing Conditions*

The project site is located on El Camino Real in the northern portion of the City of San Carlos. The site is surrounded by commercial uses to the north, south, and west and the Caltrain and Union Pacific Railroad to the east. One multi-family residential building is located approximately 100 feet to the north of the project site, across F Street in the City of Belmont. Table 4.10-2 shows the observed ambient noise levels on-site and Table 4.10-3 shows the existing calculated noise levels at nearby sensitive receptors. Figure 4.10-1 shows the location where noise measurements were taken.

Table4.10-2: Existing Ambient Noise Levels On-Site

Noise Measurement Location	Date & Time	dBA DNL	Daytime dBA Leq	Nighttime dBA Leq
Short-Term Noise Measurement				
ST-1: On-site facing F Street 146 feet from centerline of El Camino Real, 55 feet from nearest edge of Union Pacific Railroad	4/18/2023 8:00 – 8:10 AM	--	60	--

ST-2: On-site, 70 feet from center line of EL Camino Real	4/18/2023 8:10 – 8:20 AM	--	68	--
Long-Term Noise Measurements				
LT-1: On-site, 50 feet northeast of the centerline of El Camino Real	4/18/2023 to 4/19/2023	75	70 – 76	58 – 70
LT-2: On-site 14 feet southeast of the centerline of F Street and approximately 56 feet southwest of the edge of the nearest Union Pacific Railroad tracks	4/18/2023 to 4/19/2023	64	50-67	46-62
Source: Appendix F				

Table4.10-3: Summary of Ambient Noise Levels at Nearby Sensitive Receptors

Receptor	Range of Daytime Noise Levels (Average) dBA Leq	Range of Nighttime Noise Levels (Average) dBA Leq	Ldn dBA
NW Residential/Office	59 to 67 (62)	46 to 62 (53)	64
SE Commercial	70 to 76 (74)	58 to 70 (64)	75
SW Hotel/Commercial/Medical Office	70 to 76 (74)	58 to 70 (64)	75
NE Commercial	59 to 67 (62)	46 to 62 (53)	64
Note: Noise levels at these receptors were calculated based on long-term noise measurement data presented in Table 4.13-2. Source: Appendix F			

In addition, vibration measurements were made near the northwestern corner of the project site to record vibration from train activity near the project site. Twelve vibration measurements of individual train activity were conducted on April 18, 2023, between 7:50 and 9:20 AM. The vibration levels were measured at ground level approximately 60 feet from the edge of the nearest Union Pacific Railroad tracks. Table 4.10-4 shows the existing vibration levels on-site resulting from train activity.

Table4.10-4: Existing Vibration Levels from Train Pass-Bys

Date, Time	Type of Train	No. of Engines	No. of Cars	Track	Direction of Travel	Speed	Distance from V-1	Vibration Level at V-1
4/18/2023, 7:57 AM	Caltrain	1	4	Near	SB	40 mph	60	69 VdB
4/18/2023, 8:05 AM	Caltrain	1	4	Far	NB	50 mph	80	63 VdB
4/18/2023, 8:05 AM	Caltrain	1	4	Near	SB	50 mph	60	70 VdB
4/18/2023, 8:10 AM	Caltrain	1	4	Far	NB	50 mph	80	64 VdB

4/18/2023, 8:10 AM	Caltrain	1	4	Near	SB	40 mph	60	69 VdB
4/18/2023, 8:18 AM	Caltrain	1	4	Far	NB	40 mph	80	60 VdB
4/18/2023, 8:56 AM	Caltrain	1	4	Near	SB	30 mph	60	63 VdB
4/18/2023, 9:03 AM	Caltrain	1	4	Far	NB	50 mph	80	64 VdB
4/18/2023, 9:05 AM	Caltrain	1	4	Near	SB	50 mph	60	70 VdB
4/18/2023, 9:09 AM	Caltrain	1	4	Near	SB	40 mph	60	68 VdB
4/18/2023, 9:10 AM	Caltrain	1	4	Far	NB	55 mph	80	66 VdB
4/18/2023, 9:18 AM	Caltrain	1	4	Far	NB	40 mph	80	62 VdB

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐

NOISE MEASUREMENT LOCATIONS | FIGURE 4.10-1

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?

Construction Noise

Policy NOI-1.8 of the City's General Plan requires that all construction activities within the City use reasonable noise reduction measures to minimize the exposure of neighboring properties to excessive noise levels during all phases of construction. Municipal Code Section 9.30.070 limits construction to between 8:00 AM and 5:00 PM, Monday through Friday, and from 9:00 AM to 5:00 PM on Saturdays. No work is allowed on Sundays and holidays.

As discussed in Sections 2.0 Project Information and 3.0 Project Description, the project includes an Incentive request from Section 9.30.070 of the Municipal Code under the State Density Bonus law and proposes construction between 7:00 AM and 5:00 PM Monday through Friday, and from 9:00 AM to 5:00 PM on Saturdays for a period of two years and four months. The proposed project would be located approximately 100 feet south of the nearest residential use on F Street in the City of Belmont, as measured from the nearest edge of the property line (or 230 feet as measured from the centerline of construction). Noise levels generated by project construction are shown in Table 4.10-5 below.

Table4.10-5: Total Calculated Noise Levels at Nearby Land Uses

Construction Phase	Total Calculated Leq (dBA)			
	SE Commercial Building (180 feet)	SW Hotel/Medical Office (230 feet)	NW Residential/Office (230 feet)	NE Commercial Building (265 feet)
Demolition	75	73	72	71
Site Preparation	75	73	72	71
Grading/Excavation	73	71	70	70
Trenching/Foundation	72	70	69	68
Building – Exterior	70	68	68	67
Building – Interior/Architectural Coatings	66	64	63	63
Paving	71	69	68	68
Notes: The distances shown in this table were measured from the center of the project site to the receiving property lines. These noise levels conservatively assume all equipment per phase operates simultaneously and is propagated to the surrounding property lines.				

As shown in Table 4.10-5, noise levels generated during construction are estimated to range from 63 to 72 dbA Leq at existing residential uses and from 63 to 75 dBA Leq at existing hotel and commercial uses. These construction noise levels would not exceed the exterior threshold of 80 dBA Leq at the nearest residential land use in the project vicinity or the 85 dBA Leq threshold at the hotel or commercial land uses surrounding the project site. Therefore, the project would not result in a substantial temporary increase in ambient noise levels in the vicinity of the project site in excess of applicable standards. **(Less than Significant Impact)**

Nonetheless, consistent with General Plan Policy NOI-1.8, the project would be required to implement the following standard measures to further reduce construction noise at nearby sensitive receptors.[91]

Condition of Approval:

- Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists;
- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;
- Locate staging areas and construction material areas as far away as possible from adjacent land uses;
- Prohibit all unnecessary idling of internal combustion engines;
- 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.

Operational Noise

According to Action NOI-1.4 of the City’s General Plan, a significant impact would occur if the permanent noise level increase due to the project was three dBA CNEL and exceeded the “normally acceptable” level of 60 dBA or if the noise level increase from the project was five dBA CNEL or greater and remained within the “normally acceptable” range. The City’s General Plan threshold for

[91] General Plan Policy NOI-1.8 calls for projects to “limit construction activity to weekdays between 8:00 AM and 6:00 PM and weekends between 9:00 AM and 5:00 AM, 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, Veteran’s Day, Thanksgiving Day and Christmas Day.” This measure is not applicable to the proposed project, assuming that the requested Density Bonus Development Standard Incentive is approved and is, therefore, not included in the Condition of Approval.

"normally acceptable" noise levels for single-family receptors is 60 dBA and 65 dBA for multi-family receptors.

As shown in Table 4.10-3 above, noise levels in the project vicinity range from 46 to 67 dBA Leq at nearest residential uses north of the project site.

Traffic Noise

A traffic noise increase of three decibels or more occurs when traffic volumes on a roadway are doubled.[92] As noted in Appendix G Transportation Analysis, the project would generate 430 new daily vehicle trips on area roadways. A comparison of existing plus project traffic volumes to existing volumes on these roadways shows project-generated traffic would not result in a substantial increase in traffic volumes on area roadways compared to existing conditions and would, therefore, not measurably increase traffic noise levels along any roadway segments in the project vicinity. **(Less than Significant Impact)**

Mechanical Equipment Noise

The proposed project would include mechanical equipment for heating, ventilation, and air conditioning, similar to those used by the existing commercial building on-site. In addition, the project would include use of a diesel-powered fire pump, trash compactors, and exhaust fans enclosed within the below grade and podium level parking garage and corridor and trash exhaust fans on the rooftop of the building.

The HVAC system and corridor and trash exhaust fans would be located on the roof. According to the manufacturer's specifications for the HVAC system, it would produce a maximum average noise level of 68 dBA at three feet. The corridor and trash exhaust fans would produce average noise levels between 50 – 56 dBA at three feet, according to the manufacturer's specifications. The fire pump would be located within a mechanical room along the western building façade adjacent to El Camino Real and be used under emergency conditions and periodically for maintenance and testing. The maximum average noise level generated by emergency fire pumps is 73 dBA at 23 feet. The garage exhaust fan and trash compactors would be located within the interior of the building and would not generate noise levels audible or measurable at the property lines. Based on the distance between these mechanical equipment and the surrounding uses (approximately 180 to 265 feet), and the location the exhaust fans and trash compactors within the building, operational noise from the fire pump, garage exhaust fans, and rooftop HVAC system and corridor and trash exhaust fans would not exceed the existing ambient noise levels at any of the surrounding land uses and would not exceed the City's noise standards. **(Less than Significant Impact with Mitigation Incorporated)**

[92] Appendix F.

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

Construction of the proposed project may generate perceptible vibration when heavy equipment or impact tools (i.e., jackhammers, hoe rams) are used in the vicinity of nearby sensitive land uses. As discussed in Section 3.2.6 Construction, construction activities would include demolition of the existing commercial building, site preparation, excavation, foundation work, and building framing and finishing. Impact pile driving (which generates substantial vibration) is not proposed as a method of construction.

The California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings 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 0.08 in/sec PPV for historic buildings or buildings that are documented to be structurally weakened.

As noted in Section 4.3 Cultural Resources, there are no historic resources on or adjacent to the project site. The nearest historic building to the project site is the Southern Pacific Depot, located approximately 0.5 miles south of the project site.

Based on the noise and vibration assessment prepared for the project, construction of the project would generate vibration levels up to 0.210 in/sec PPV during use of vibratory rollers and up to 0.202 in/sec PPV for a clam shovel drop at a distance of 25 feet. Given the distance to the nearest building (commercial building approximately 180 feet south of the project site), [93] these vibration levels would not exceed the 0.3 in/sec PPV for all buildings of modern construction. Additionally, project-generated vibration levels would not exceed the threshold of 0.08 in/sec PPV at the nearest historic building (located 0.5 miles south of the project site). For these reasons, the proposed project would not result in generation of excessive ground borne noise and vibration. **(Less than Significant Impact)**

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is located outside the CNEL noise contours for the San Carlos Airport and San Francisco International Airport.[94] For these reasons, the proposed project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

[93] Distance is measured from the center of project construction to the nearest property line of the commercial use.
[94] San Carlos Airport Land Use Compatibility Plan. Exhibit 4-1 Existing Conditions (2013) Aircraft Noise Contours. October 2015.

4.10.3 Non-CEQA Effects

Per California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of San Carlos has policies (including General Plan Policies NOI-1.4 through NOI-1.6) that address existing noise conditions affecting a proposed project.

Residential Outdoor Uses

As noted in Section 3.2, the project would include two courtyards at the center of the proposed building, two rooftop decks, and a fenced dog park at ground level in the southeast corner of the site. Noise levels at these outdoor use areas would range from 60 dBA at the courtyards and the rooftop deck on the sixth floor to 65 dBA at the dog park and rooftop deck on the fifth floor. Therefore, future noise levels at common outdoor activity areas would be considered normally acceptable and would not exceed the City's threshold of 65 dBA for multi-family residential uses.

Residential Indoor Uses

Future exterior noise levels at the northeast and southwest facades (facing the Caltrain Railroad tracks and El Camino Real, respectively) of the proposed residential building would experience the highest noise levels on-site. Exterior noise levels at the northeast building façade would be 65 dBA Ldn while the exterior noise levels at the southwest façade would be 75 dBA. Additionally, the maximum noise levels at the nearest building façade resulting from Caltrain operations would range from 81 to 95 dBA. Standard residential construction provides 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Therefore, assuming standard residential construction, interior noise levels at the project site would be approximately 50 to 60 dBA assuming windows are partially open and 45 to 50 dBA with windows closed. These interior noise levels would exceed the City's threshold of 45 dBA DNL for internal residential spaces. Consistent with the design-level noise assessment prepared by Summerhill Apartment Communities for the project and the noise assessment by Illingworth & Rodkin, the project would be required to implement the following Conditions of Approval to reduce noise levels at proposed residential indoor use areas to below the City's threshold (General Plan Policy NOI-1.5(d).

Conditions of Approval:

- Provide a suitable form of forced-air mechanical ventilation, as determined by the local building official, so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards.
- Preliminary calculations indicate that residential units located along the exterior building façades would require windows and doors with a minimum rating of 34 to 36 STC with adequate forced-air mechanical ventilation to meet the City's interior noise threshold of 45 dBA L_{dn}.

- Exterior walls facing the railroad tracks should implement staggered-stud construction methods or resilient channel systems to improve the transmission loss of the partition.
- Preliminary calculations indicate that residential units located along the building facades would require windows and doors with a minimum rating of 28 to 44 STC with adequate forced-air mechanical ventilation to meet the maximum railroad interior noise levels of 55 dBA in bedrooms.

As noted in Section 2.7 Project-Related Approvals, Agreements, and Permits, the project would include a Density Bonus Development Standard and Incentives Waiver. The project applicant is requesting an incentive from General Plan Policy NOI-1.5(d) for interior noise levels. Assuming that the requested Density Bonus Development Standard Incentive is approved, the project would be exempt from General Plan Policy NOI-1.5(d).

4.11 Public Services

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and Local

San Carlos 2040 General Plan

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

Policy	Description
CSS-3.1	Evaluate fire response needs of the Fire Department as new development and redevelopment continues to be proposed within the City limits.
CSS-3.9	Support "early review" of proposed development by the Belmont-San Carlos Fire Department and institute impact fees to ensure adequate all-risk fire equipment for the community.

CSS-3.10	Continue to require all new development to provide all necessary water service, fire hydrants and road improvements consistent with City standards and the California Fire Code.
CSS-3.11	Ensure that in existing, developed areas within the city there is an acceptable level of fire safety and emergency medical/paramedic services.
CSS-7.2	Establish and regularly monitor levels of service of San Carlos' public facilities and services.
CSS-7.4	Work with all special districts, including the school districts, to ensure that development within the City is coordinated with provision of services.
CSS-7.6	Maintain existing library facilities as an important activity center within the community.
CSS-7.9	Ensure that adequate public services and facilities are planned and constructed to accommodate the population of the City.
CSS-7.10	Require existing overhead utility lines be placed underground in new development and redevelopment through a phased program of conversion in existing overhead areas.
CSS-8.4	Evaluate through the California Environmental Quality Act (CEQA) process how new development impacts schools, as the quality of San Carlos schools is a primary asset of the city.
CSS-9.1	Provide diverse, high-quality experiences for cultural activities and the arts.
CSS-9.2	Provide functionally well-designed, conveniently-located facilities for cultural activities and the arts, both indoors and outdoors.
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.

4.11.1.2 *Existing Conditions*

Fire Protection Services and Emergency Medical Aid

Fire protection, hazardous materials response, disaster preparedness, and emergency medical response are provided by the Redwood City Fire Department under contract to the City of San Carlos. There are two fire stations located in the City of San Carlos.[95] City Fire Station 13 is the nearest fire station to the project site located approximately a half-mile to the south.

Police Protection Services

Police protection services are provided by the San Carlos Bureau of the San Mateo County Sheriff's Office.[96] The San Carlos Bureau of the San Mateo County Sheriff's Office is located at 400 County Center in Redwood City.

Schools

The project area is served by the San Carlos School District (SCSD). SCSD is a preschool through 8th grade school district with seven schools, including four elementary schools (serving Kindergarten through 3rd grades), two upper grade elementary schools (serving 4th and 5th grades), two middle

[95] City of San Carlos. "San Carlos/Redwood City Fire Department." Accessed April 4, 2023. https://www.cityofsancarlos.org/government/departments/fire

[96] City of San Carlos. "San Mateo County Sheriff's Office - San Carlos Bureau." Accessed April 4, 2023. https://www.cityofsancarlos.org/government/departments/sheriff-s-office

schools (6th through 8th grades), and one kindergarten through eighth grade charter school. Students at the project site would attend Arundel Elementary School (Kindergarten through 3rd grades) located at 200 Arundel Road (approximately 0.68 miles west of the project site), as well as Mariposa Elementary School (serving 4th and 5th grades) and Tierra Linda Middle School both of which are located at 750 Dartmouth Avenue (approximately 0.95 miles west of the project site). In addition, students at the site would attend Carlmont High School located at 1400 Alameda de las Pulgas, approximately 1.13 miles west of the site.

Parks and Libraries

The City's Department of Parks and Recreation is responsible for development, operation, and maintenance of all City park facilities. The City of San Carlos owns and maintains 16 parks, including neighborhood parks, recreational parks, a dog park and open spaces. According to Figure 7-3 Parks and Open Space of the City's General Plan, the nearest park to the project site is Cedar Street park located approximately 0.22 miles to the west of the project site.

The project area is served by the San Mateo County Libraries, which include 13 public libraries. The closest library to the project site is located at 610 Elm Street in San Carlos, approximately 0.6 miles southwest of the site.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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:				
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other Public Facilities?	☐	☐	☒	☐

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

The proposed project would result in a net increase of 607 residents compared to existing conditions,[97] which would incrementally increase the demand for fire protection services compared to existing conditions. The General Plan EIR concluded that construction of new fire stations would not be required to adequately serve the larger population.

As discussed in Section 4.9 Land Use and Planning, the proposed project is consistent with the General Plan land use designation and growth projections for the site and would not, therefore, require the construction of new or expanded fire protection facilities. The proposed project would be constructed in accordance with current building codes and would be required to be maintained in accordance with applicable City policies, such as General Plan Policy CSS-3.10, to provide all necessary water service, fire hydrants and road improvements consistent with City standards and the California Fire Code. For these reasons, the proposed project would not result in a substantial adverse physical impact associated with the provision of new or physically altered fire protection facilities. **(Less than Significant Impact)**

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

As discussed under checklist question a. above, increased development on-site resulting from the proposed project would incrementally increase the demand for police protection services compared to existing conditions. The General Plan EIR concluded that the current Sheriff's department headquarters will be upgraded within the next few years and increased demand for police protection services could result in an incremental increase in response times; however, construction of these facilities would not result in significant adverse environmental impacts.

As discussed in Section 4.9 Land Use and Planning, the proposed project is consistent with the General Plan land use designation and growth projections for the site and, therefore, demand for police protection generated by the proposed project was accounted for in the General Plan EIR and found to be less than significant. Furthermore, the proposed project would be constructed in

[97] Assuming the City average household size of 2.51 persons per dwelling unit, the proposed 242-unit apartment building would generate approximately 607 residents on a site that currently does not contain any residential units. Source: Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2023. Accessed May 30, 2023. https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2023/

accordance with current building codes and would be required to be maintained in accordance with applicable City policies to promote public and property safety. For these reasons, the proposed project would not result in a substantial adverse environmental effect associated with the provision of new or physically altered police protection facilities. **(Less than Significant Impact)**

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

The proposed project would result in a net increase of 607 residents compared to existing conditions. Based on an average student generation rate of 0.2 for elementary and middle school students per unit in the San Carlos School District, 96 of those residents would be school aged students including 48 elementary school students and 48 middle school students.[98] In addition, the project is estimated to generate approximately five high school students, for a total of 101 students.[99] The General Plan EIR concluded that increased student enrollment resulting from implementation of the General Plan may require construction of new schools or expansion of existing schools within the San Carlos School District in order to adequately serve the larger population. [100]

As discussed in Section 4.9 Land Use and Planning, the proposed project is consistent with the General Plan land use designation and growth projections for the site. While buildout of the General Plan would require an expansion of school capacity, the project by itself would not. Furthermore, the project applicant will be required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed project in accordance with California Government Code Section 65996. Payment of school impact fees, as allowed by Government Code 65996, are meant to offset increased student enrollment and has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities. **(Less than Significant Impact)**

[98] Note: Smaller unit types including studio or one-bedroom apartments are unlikely to generate students given their anticipated small size. For this reason, Student generation estimates for the proposed project represent a conservative estimate. Source: City of San Carlos. *San Carlos Focused General Plan Update Draft EIR.* October 2022. Page 4.13-25.

[99] The project would develop 242 residential units, or 6.7 percent of the 3,595 residential units planned in the Focused General Plan Update. Thus, the project would generate 6.7 percent of the 79 high school students generated by the planned growth from the Focused General Plan Update, or 5 students. Source: Ibid.

[100] City of San Carlos. *San Carlos Focused General Plan Update Draft EIR.* October 2022. Page 4.13-25 and 4.13-26.

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

New residents generated by the project would use existing recreational facilities in the area, including Cedar Street Park. The project could generate up to 607 new residents. The new residents would incrementally increase the use of existing recreational facilities in the project area. The proposed project would include indoor amenity spaces, rooftop decks, and courtyards which would reduce the use of existing parks by future residents of the proposed project.

The General Plan EIR concluded that development allowed under the General Plan would increase demand for parks and recreational facilities and that 21.6 acres of new parks would be required to meet the City's parkland ratio of 2.5 acres per 1,000 residents. However, the environmental effects associated with construction these new park facilities would be identified through the environmental review process and mitigated by future development projects through payment of the appropriate Park Facility Development fees to the City at the building permit stage, consistent with Section 3.34 of the City's Municipal Code.

As discussed in Section 4.9 Land Use and Planning, the proposed project is consistent with the General Plan land use designation and growth projections for the site and would pay Park Facility Development fees consistent with the City's Municipal Code. Therefore, the project would result in the same less than significant impact with regard to the provision of new or physically altered park facilities. **(Less than Significant Impact)**

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

The proposed project would result in a net increase of 607 residents compared to existing conditions, which would increase demand for library services. The General Plan EIR concluded that any remodeled or new library facility would be subject to environmental review under CEQA and new residential development allowed under the General Plan would increase the tax base of the City and could be used to offset demand for library services. Therefore, the General Plan EIR concluded that increased population associated with build out of the General Plan would result in less than significant impacts related to library services.

As discussed in Section 4.9 Land Use and Planning, the proposed project is consistent with the General Plan land use designation and growth projections for the site and would, therefore, result in the same less than significant impact on library services. **(Less than Significant Impact)**

4.12 Transportation

The following discussion is based, in part on a Transportation Impact Analysis prepared for the project by Hexagon Transportation Consultants, Inc. in May 2023. This report is included as Appendix G to this Initial Study.

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including San Mateo County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Congestion Management Program

CCAG oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that urbanized counties in California prepare a CMP in order to obtain each county's share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and

transportation demand management plan, a land use impact analysis program, and a capital improvement element. CCAG has review responsibility for proposed development projects that are expected to affect CMP-designated intersections.

City of San Carlos 2030 General Plan

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

Policy	Description
LU-5.1	Maintain a diversity of land uses while achieving the desired transportation level of service.
CSH-2.2	Provide for adequate pedestrian and bicycle facilities as viable transportation modes in San Carlos as recommended in the San Carlos Bicycle and Pedestrian Master Plan.
CSH-3.1	Strive to reduce base-line and development-related traffic by 20 percent through public-private partnership efforts.
CSH-3.3	Support the incorporation of Transportation Demand Management in new development to reduce traffic impacts.
CSH-3.7	Public sidewalks and walkways shall be designed to accommodate access in accordance with the Americans with Disabilities Act and shall be kept clear.
CSH-3.8	The City shall strive to maintain intersection service levels above the mid-range of level D (not to exceed a Volume-to-Capacity Ratio (V/C) of 0.

San Carlos Vehicle Miles Traveled (VMT) Policy

Pursuant to SB 743, in 2020, the City adopted a VMT Policy based on the assessment of local needs and development characteristics, to be used in evaluating the potential VMT impacts of land development and transportation projects. The City's policy is generally consistent with the OPR technical advisory, establishing a significance threshold of 15 percent below the countywide average VMT per service population. Housing projects are exempt from VMT analysis if they are located within one-half-mile of the San Carlos Caltrain station or El Camino Real and are consistent with the General Plan Land Use Designations and Zoning Code or if they generate fewer than 100 trips per day, corresponding with thresholds established by C/CAG for the CMP.

San Carlos Complete Streets Policy

In 2021, the City adopted a Complete Streets Policy to support the development of a multimodal transportation network that serves all categories of users. Provisions of the policy include applying a context-sensitive approach to local conditions so that appropriate facilities will be designed to best serve the needs of residential as well as commercial areas, with consideration for the urban, suburban, or rural nature of the location.

Transportation Demand Management Program

The City of San Carlos has adopted a Transportation Demand Management (TDM) program (Chapter 18.25.030 of the Municipal Code) with requirements that apply to all new residential developments, except for single-family dwellings, accessory units, and multi-family projects of fewer than ten units. The TDM program requires each qualifying project to incorporate TDM measures to reduce the estimated project-generated trips to 20 percent lower than the most recent trip generation rates from the Institute for Transportation Engineers (ITE) Trip Generation Manual. To demonstrate compliance with the TDM program, applicants must meet monitoring requirements. For projects not in compliance with program requirements, the City may require project owners/operators to modify their previously approved TDM measures.

4.12.1.2 *Existing Conditions*

Access to the project site is provided via Highway (US) 101, Interstate (I-) 280, El Camino Real, and local roadways in the project vicinity, as described below.

US 101 is a north-south highway that runs between southern California and the state of Washington. Locally it is an eight-lane, grade-separated freeway and is a major corridor serving communities on the San Francisco Peninsula. In San Carlos, a full interchange along US 101 exists at Holly Street, and a partial interchange with southbound US 101 is provided at Brittan Avenue. There is also a full interchange at Ralston Avenue in Belmont, while Harbor Boulevard and Whipple Avenue provide access to and from southbound US 101 in Belmont and Redwood City, respectively.

Interstate 280 is a major north-south route along the Peninsula connecting San Jose with San Francisco. In the project vicinity it is located just west of the San Carlos city limits. Ralston Avenue in Belmont provides access to I-280 via State Route (SR) 92, as the SR 92/I-280 interchange is located approximately one-half of a mile west of the SR 92/Ralston Avenue interchange. Along the segment near San Carlos, I-280 includes eight travel lanes.

El Camino Real, also designated as SR 82, is a regional route that extends between I-880 in San José and I-280 in San Francisco. El Camino Real functions as a state highway and commercial corridor through communities along the San Francisco Peninsula. Within San Carlos, the roadway has two through lanes in each direction. The San Carlos Caltrain station is located on El Camino Real.

Holly Street is an arterial street that runs east-west through downtown San Carlos and provides access to US 101 and the Redwood Shores community to the east. East of El Camino Real there are two travel lanes in each direction. West of El Camino Real there is one travel lane in each direction.

Existing Pedestrian Facilities

Pedestrian facilities in the project vicinity consist of sidewalks along surrounding streets including the project frontage along El Camino Real. The sidewalk is missing from the north side of F Street, however, there is a sidewalk along the south side of F Street to access an underpass for pedestrian and bicycle users. The existing sidewalks can be used to access the San Carlos Caltrain station as

well as other amenities adjacent to the project site. Crosswalks with pedestrian signal heads and push buttons are available at all nearby signalized intersections, with the exception of the El Camino Real/5th Avenue intersection, which includes an unsignalized crosswalk.

Existing Bicycle Facilities

Bicycle facilities in the study area include Class II bike lanes and Class III bike routes. Class II bike lanes are lanes on roadways designated for use by bicycles with special lane markings, pavement legends, and signage. Class III bike routes are existing streets that accommodate bicycles but do not have bike lanes separated from the existing travel lanes.

In the vicinity of the project site, existing Class II bike lanes are located on Industrial Road between Harbor Boulevard and Middlefield Road. Existing Class III bike routes are located on Old County Road from Ralston Avenue to Terminal Way, along Cedar Street from Hull Drive to Eaton Avenue, and along San Carlos Avenue from Elm Street to Old County Road. A bicycle boulevard exists along San Carlos Avenue, from Old County Road to Industrial Road. There is also an underpass available for bicycle and pedestrian users to cross under the Caltrain tracks at F Street/Old County Road, approximately 75 feet north of the project site. Existing bicycle facilities in the project vicinity are shown in Figure 4.12-1 below.

Existing Transit Facilities

Transit services in the project vicinity are provided by SamTrans and Caltrain. Existing transit facilities in the project vicinity are shown in Figure 4.12-2 below.

SamTrans

SamTrans provides fixed-route bus service throughout San Mateo County and provides connections to San Francisco and Palo Alto. The nearest bus stop to the project site which serves these routes is located 300 feet away from the project site at the intersection of El Camino Real and 5th Avenue. The following routes service the project site.

Route ECR provides service along El Camino Real from the Palo Alto Transit Center to the Daly City BART station. On weekdays, the bus runs every 20 minutes from approximately 4:00 AM to 2:00 AM. On weekends, it runs every 30 minutes from 4:45 AM to 2:00 AM.

Route 397 runs between Downtown San Francisco and the Palo Alto Transit Center. It operates daily from approximately 1:00 AM until 6:30 AM with one-hour headways, with no mid-day or evening service. This route serves the San Francisco International Airport, the Millbrae Transit Center, and the Redwood City Transit Center.

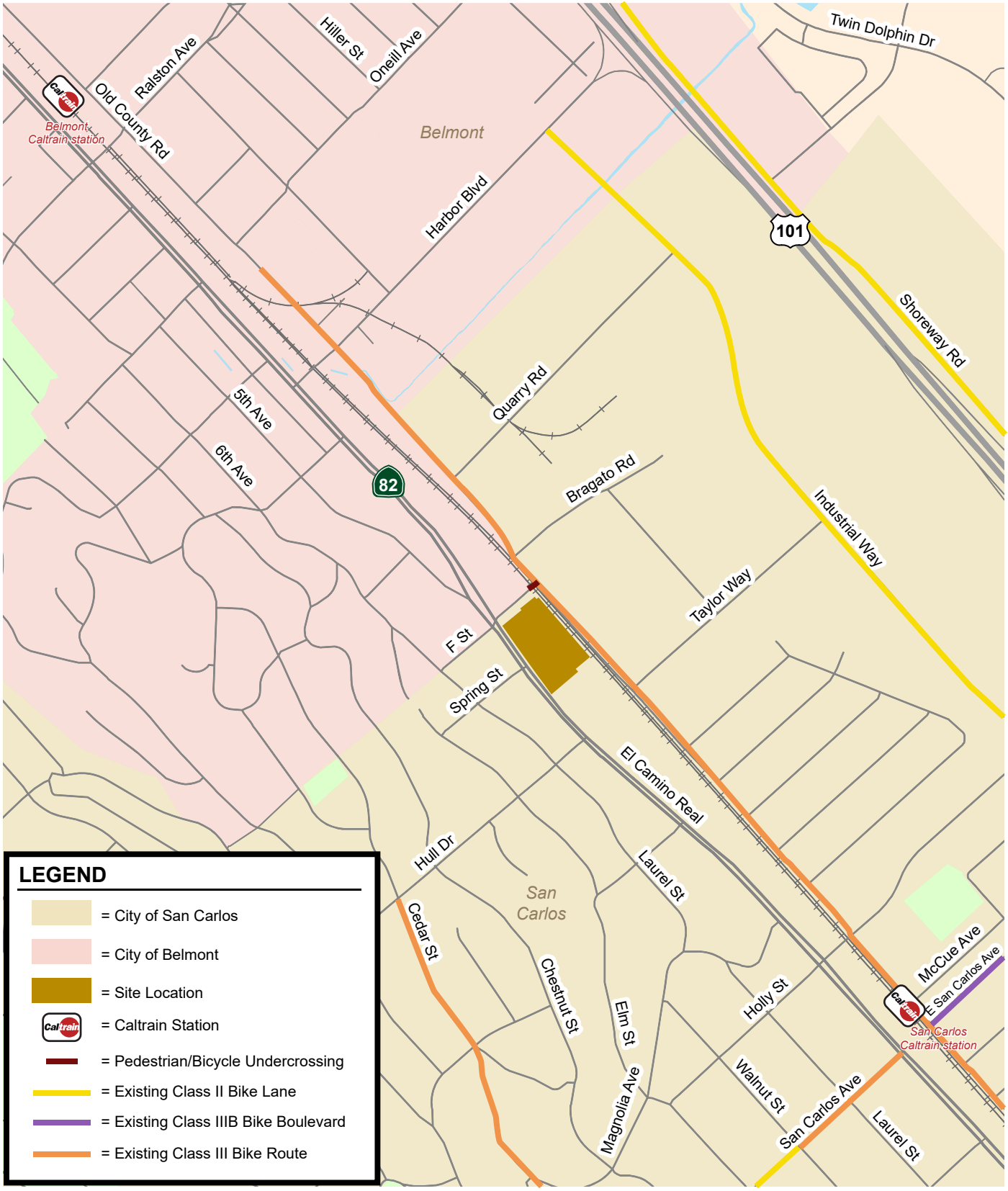

Figure 3
Existing Bicycle Network

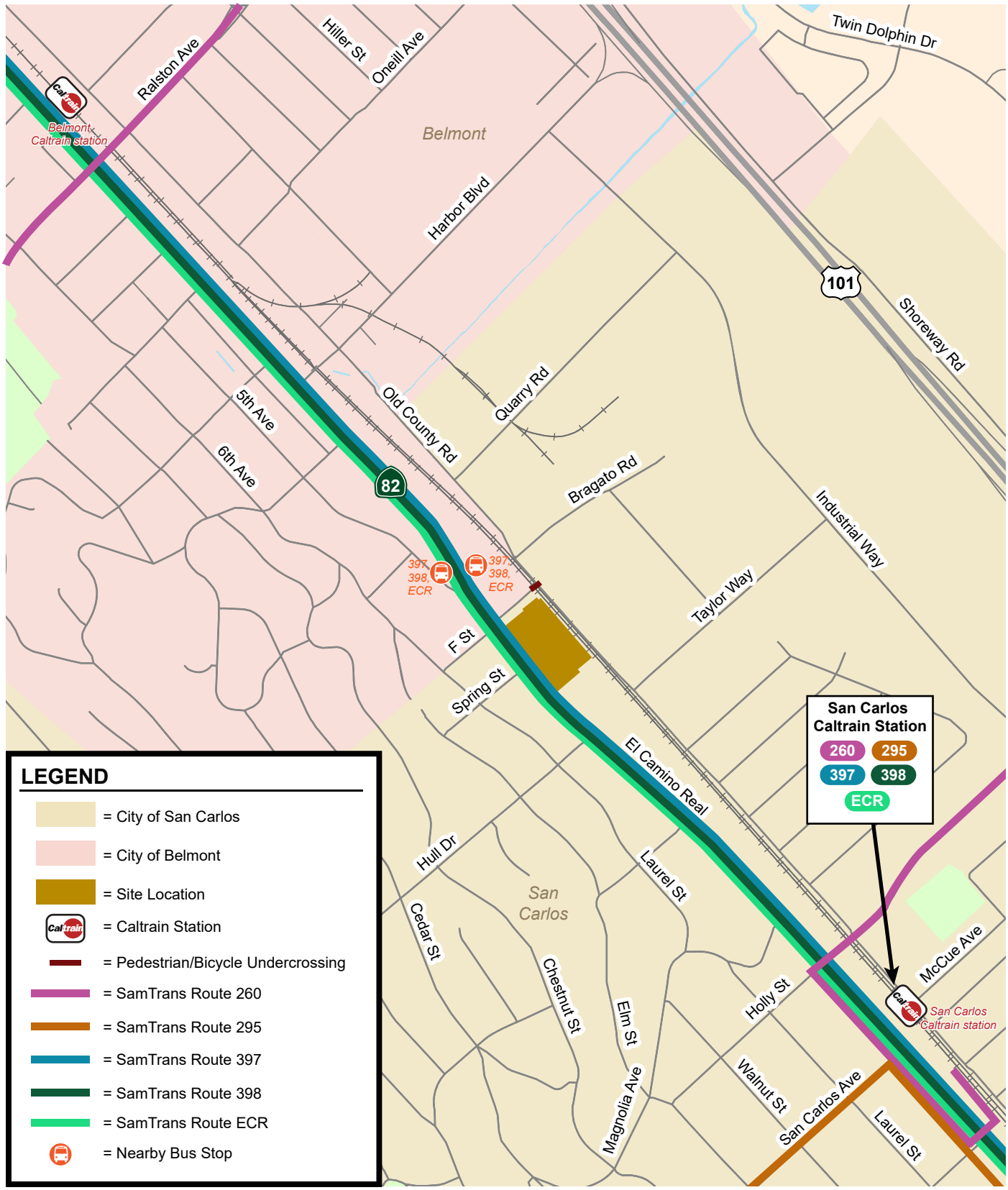

Figure 4
Existing Transit Services

Route 398 runs between the San Bruno BART station and the Redwood City Transit Center and also serves the San Francisco International Airport. It runs hourly from 5:00 AM to 11:30 PM on weekdays and 6:00 AM to 11:30 PM on weekdays.

Caltrain

Caltrain is commuter rail line serving the San Francisco Peninsula. Caltrain connects San Carlos with San Francisco to the north and San José and Gilroy to the south. On weekdays, there are 31 trains servicing the San Carlos Station in the northbound and southbound directions. On weekends, there are 16 trains that stop at the station in each direction. The San Carlos Caltrain Station is located on El Camino Real near the intersection with San Carlos Avenue. In addition, the Belmont Caltrain Station is located on El Camino Real near the intersection with Ralston Avenue.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, 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 land uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

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

Roadway Facilities

The proposed project would involve development of a 242-unit apartment building on an infill site. The proposed project would not involve any changes to the roadways in the project vicinity, with the exception of extending the existing median island in El Camino Real to align the existing southbound left turn lane with the proposed driveway entrance to the parking garage. No changes to existing roadways or intersections are proposed. The proposed project would not interfere with implementation of identified Capital Improvements projects. For these reasons, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the roadway circulation system.

Pedestrian Facilities

As noted in Section 4.12.1.2 Existing Conditions, the project site is served by a continuous sidewalk on El Camino Real and other surrounding roadways which provide access from the project site to the San Carlos Caltrain station as well as other amenities adjacent to the project site. Crosswalks with pedestrian signal heads and push buttons are found at all the nearby signalized intersections with the exception of the El Camino Real/5th Avenue intersection with is includes an unsignalized crosswalk.

The proposed project would include replacement of the existing five-foot wide sidewalk with an eight-foot-wide buffered sidewalk, construction of pedestrian plazas along El Camino Real connecting pedestrian paths to the building entrances, and drop-off areas in an unsecured portion of the parking garage. Overall, the proposed sidewalk would provide adequate space and circulation along the project frontage. For these reasons, the project would not conflict with any plans, ordinances, or policies related to pedestrian facilities and impacts would be less than significant. **(Less than Significant Impact)**

Bicycle Facilities

As noted above under Section 4.12.2 Existing Conditions, existing bicycle facilities in the project vicinity include Class II bike lanes Class III bike routes, a bicycle boulevard, and an underpass for bicycle and pedestrian users to cross under the Caltrain tracks at F Street/Old County Road. The San Carlos Bicycle and Pedestrian Master Plan recommends Class II buffered bike lanes on El Camino Real.

As proposed, the project would provide bicycle parking. The project would not remove any existing bicycle facilities, nor would it conflict with any adopted plans or policies for new bicycle facilities. For these reasons, the proposed project would not conflict with implementation of the San Carlos Bicycle and Pedestrian Master Plan or impede the implementation of the General Plan goals and policies related to bicycle facilities and impacts would be less than significant. **(Less than Significant Impact)**

Transit Facilities

As noted in Section 4.12.1.2 Existing Conditions above, the project site is served by SamTrans Routes ECR, 397, and 398. The nearest bus stop is located 300 feet away from the project site at the intersection of El Camino Real and 5th Avenue. Many other bus routes serve the San Carlos Caltrain Station, which is about 0.55 miles from the project site. The project is expected to generate a small increase in transit demand, which could be accommodated by the available capacity of the SamTrans bus service as well as Caltrain. Therefore, the proposed project would not conflict with an adopted plan, policy, or program addressing the transit circulation system. **(Less than Significant Impact)**

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

The City of San Carlos adopted a VMT policy in 2020. Under this policy a project may be screened out of a detailed VMT analysis if the use, size, or location supports a presumption that, if analyzed, the project's VMY impact would be less than significant. These screening criteria include the following:

- Small projects (i.e., fewer than 100 trips per day)
- Project in low VMT areas
- Housing projects near transit (i.e., within ½ mile walkshed of the San Carlos Caltrain Station or El Camino Real)

As noted in Section 3.0 Project Description, the project site is located within one-half mile of El Camino Real and thus, the project is presumed to have a less than significant VMT impact. **(Less than Significant Impact)**

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

The following site access and circulation evaluation is based on a review of the project site plan. Site access was evaluated to determine the adequacy of the site's access points with regard to traffic volumes, delays, vehicle queues, geometric design, and stopping sight distance. On-site vehicular circulation was reviewed in accordance with the City of San Carlos Zoning Code and generally accepted traffic engineering standards.

Site Access and Driveway Design

Vehicular access to the project site would be provided via one full access driveway in the center of the site and one full access driveway along the southern property line, both with access to El Camino Real. The central driveway would be 20 feet wide with one inbound and one outbound lane and would provide access to the main project drive aisle within the parking garage. The driveway on the southern property line would provide emergency vehicle access to the site, as well as access to a loading/move-in/trash area, and access to the adjacent San Carlos Plaza shopping center. The southern driveway would have a width of 26 feet. Section 18.20.100 of the City's Municipal Code establishes a minimum driveway width for multi-family developments of 20 feet. Therefore, the proposed driveways on-site would meet the City's requirements.

In addition to meeting the minimum width requirements, the project driveways must provide adequate access and stacking space for vehicles entering the site to avoid backups onto the sidewalks and streets. The project driveway should provide enough stacking space for approximately two inbound vehicles. Typically, a minimum distance of 50 feet, the equivalent of

two vehicles, measured from the face of the curb provides adequate stacking space at driveways. The site plan shows a gate internal to the garage with approximately 170 feet of queuing space before vehicles queue onto the sidewalk. Therefore, the project driveway design is adequate. **(Less than Significant Impact)**

Sight Distance

Driveway locations were evaluated to determine if the sight distance at the driveways would be adequate. Driveways should be free and clear of any obstructions to optimize sight distance to ensure drivers in exiting vehicles can see pedestrians on the sidewalk and other vehicles traveling on adjacent roadways. Sight distance of a driveway is evaluated based on the stopping sight distance recommended by Caltrans for a given design speed. El Camino Real has a posted speed limit of 35 mph for which the Caltrans stopping sight distance is 250 feet. As shown on the site plan, the project does not propose tall vegetation or objects that would block a driver's ability to see 250 feet north and south on El Camino Real from either driveway. Parking is also prohibited along this portion of El Camino Real. Therefore, sight distance at the driveways is adequate. **(Less than Significant Impact)**

Truck Access

The project would include a trash/loading/move-in area on the southeastern side of the proposed building as well as a loading space in the parking garage. The trash/loading/move-in area on the southeastern side of the proposed building would be accessed via the southern driveway on El Camino Real which is 26 feet wide. This driveway would also serve as an emergency vehicle access for the project site and would meet the City's 20-foot width requirement. Therefore, truck access on the project site would be adequate and would not result in a substantial increase in hazards due to geometric design. **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

Emergency vehicle access to the project site would be provided via a 26-foot-wide driveway along El Camino Real and via the trash/loading/move-in area along the southeastern building façade. As discussed under checklist question c. above, the proposed southern driveway meets the City's 20-foot width requirement for truck and emergency vehicle access. For these reasons, the project would not result in inadequate emergency access and would comply with City guidelines for emergency access. **(Less than Significant Impact)**

4.13 Tribal Cultural Resources

4.13.1 Environmental Setting

4.13.1.1 *Regulatory Framework*

State

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of non-exempt projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

California Native American Historical, Cultural, and Sacred Sites Act

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

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

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

Local

San Carlos 2030 General Plan

The General Plan Policy LU-45.5 requires all projects within the city comply with the California Native American Graves Protection and Repatriation Act to treat any human remains discovered with dignity and respect.

4.13.1.2 *Existing Conditions*

The project site is developed with a single-story commercial building and associated parking lot. According to a California Historical Resources Information System search completed for the project, there are no recorded cultural resources within the site or a 0.25-mile radius of the project site.[101]

4.13.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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)?	☐	☐	☒	☐

[101] ESA. *CHRIS-NWIC Records Search for 11 El Camino Real, San Carlos, San Mateo County, California.* June 1, 2021.

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.	☐	☐	☒	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

As noted in Section 4.13.1.2 Existing Conditions above, there are no known cultural resources within the project site or a 0.25-mile radius of the site. The proposed residential project is considered an exempt project under CEQA. Therefore, AB 52 tribal notification is not required. In addition, if previously unrecorded cultural resources are encountered during project construction compliance with the City Conditions of Approval identified in Section 4.5 Cultural Resources would reduce cultural resources impacts to a less than significant level. For these reasons, the project would not result in a substantial adverse change in the significance of a tribal cultural resource. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Refer to discussion in checklist question a above. **(Less than Significant Impact)**

4.14 Utilities and Service Systems

The following discussion is based, in part on a Sanitary Sewer Analysis prepared for the project by CBG in December 2022. This report is included as Appendix H to this Initial Study.

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of San Carlos adopted its most recent UWMP in June 2021.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

Assembly Bill 341

AB 341 sets forth the requirements of the statewide mandatory commercial recycling program. Businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units in California are required to recycle. AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a WSA containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610,

WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include any of the following:

- A proposed residential development of more than 500 dwelling units;
- A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- A proposed hotel or motel, or both, having more than 500 rooms;
- A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- A mixed-use project that includes one or more of the projects identified in this list; or
- A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Senate Bill 1383

SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle released an analysis titled "Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals" in August of 2020, which recommended maintaining the disposal reduction targets set forth in SB 1383.[102]

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, establishing mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris; and

[102] CalRecycle. Analysis of the Progress Toward the SB 1383 Organic Wase Reduction Goals. August 18, 2020. https://www2.calrecycle.ca.gov/Publications/Details/1693#:~:text=Analysis%20of%20the%20Progress%20Toward,(DRRR%2D2020%2D1693)&text=SB%201383%20establishes%20targets%20to,75%20percent%20reduction%20by%202025.

- Providing readily accessible areas for recycling by occupants.

Policy	Description
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.
EM-5.3	Promote the conservation and efficient use of water in new and existing residences and by commercial and industrial consumers.
EM-5.10	Require the evaluation of potential groundwater depletion that could occur from new development through dewatering.
EM-12.3	Encourage the public and private sector to utilize reusable, returnable, recyclable, environmentally-friendly products and repairable goods through incentives, educational displays and activities, as well as City purchasing policies and practices.

4.14.1.2 *Existing Conditions*

Water Service

California Water Service (Cal Water) is the primary potable water provider in the City of San Carlos. The City is part of the Cal Water's Bayshore District which purchases water from the San Francisco Public Utilities Commission. The main source of water for the Bay Shore District is the Hetch Hetchy reservoir located in the Sierra Nevada mountains. Cal Water adopted its most recent UWMP in June 2021.

The Cal Water UWMP was developed based on 2040 population, housing, and employment projections developed by ABAG. The UWMP concluded that there would be sufficient water supplies to serve projected demand through 2045 under normal years, but identified potential water shortages for the Cal Water service area (including the City of San Carlos) under both single- and multiple-dry years beginning in 2025. However, the water supply projections included in the UWMP represent a worst-case scenario in which SFPUC does not meet its contractual obligations and Cal Water's forecasted demands during droughts. Projections without the Bay-Delta Plan Amendment show demand from Cal Water's service area being met during all year types through 2045, except the 4th and 5th consecutive dry year in 2045, during which 85 percent of Cal Water's projected demands would be met.[103]

Since adoption of the 2021 UWMP, ABAG projections have been updated for 2050 (Plan Bay Area 2050), and the City of San Carlos adopted a Focused General Plan Amendment to address the most recent Regional Housing Needs Assessment for the City. Thus, the population, housing, and employment projections assumed in the UWMP does not include the population and housing projections in the City's Focused General Plan Amendment.

The City is in contract with Silicon Valley Clean Water (SVCW), formerly the South Bayside System Authority, a waste water treatment plant, that provides recycled water to San Carlos and Redwood

[103] Cal Water Service. *2020 Urban Water Management Plan, Mid-Peninsula District*. June 2021. Page 96.

City. The City offers residents free recycled water for use in landscape irrigation as part of the Recycled Water Program.

The existing use on-site has a water demand of 30,568 gallons per day.[104]

Sanitary Sewer/Wastewater Treatment

San Carlos Public Works Department provides wastewater collection service to all City accounts and include limited neighboring sewer districts. Wastewater is conveyed to a pump station to be treated by SVCW at the Redwood City Wastewater Treatment Facility. SVCW has completed a Capital Improvement Program, replacing and rehabilitating its pump stations, treatment plant, and forcemain, to ensure reliability and public health.[105] The SVCW Plant has a capacity to treat 29.5 million gallons per day (mgd), but currently receives approximately 20 mgd from residential and commercial customers in the SVCW service area.[106]

The existing commercial building on-site is estimated to generate approximately 3,396 gpd of wastewater.[107] The project site currently connects to an existing six-inch sanitary sewer line in El Camino Real via a main that extends through the adjacent property to the south.

Storm Drainage

The San Carlos storm drain system is operated and maintained by the City. The service area includes the Pulgas Creek and Cordilleras Creek Watersheds and the unlined creek channels of Belmont, Pulgas, Brittan and Cordilleras creeks. Limited capacity of upstream stormwater retention areas and limited stormwater capacity of creeks during high tide present flooding challenges to the City.

Solid Waste

San Mateo County's Countywide Integrated Waste Management Plan (IWMP) was adopted in 1999 and was reviewed in 2004, 2009, 2014 and 2019. Each jurisdiction in San Mateo County had a diversion requirement of 50 percent for 2015 and for each year thereafter.[108, 109] According to the IWMP, there is only one active landfill operating in the San Mateo County, the privately-owned Ox Mountain landfill outside of Half Moon Bay. The landfill has a remaining capacity of 22 million cubic yards, with an estimate closure year of 2034.[110]

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[104] For the purposes of this initial study, wastewater flow rates are assumed to be 95 percent of the total site water use due to the limited landscaping. Wastewater flow rates are estimated to be 3,396 gpd. Source: CBG. El Camino Real. Sanitary Sewer Analysis. December 22, 2022.
[105] California Water Service. 2015 Urban Water Management Plan. June 2016.
[106] California Water Service. 2020 Urban Water Management Plan. June 2021
[107] CBG. *Sanitary Sewer Analysis, 11 El Camino Real, San Carlos, California.* December 22, 2022.
[108] Daly City did not meet the 50 percent target but was approved based on a "good faith effort" to achieve the goal.
[109] San Mateo County Civil Grand Jury. Planning for the County's Waste Management Challenges. 2018-2019.
[110] CalRecycle. "SWIS Facility/Site Activity Details, Corinda Los Trancos Landfill (Ox Mountain) (41-AA-0002)." Accessed April 6, 2023. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223

San Carlos solid waste and recyclables service is provided by the South Bay Waste Management Authority. Solid waste and recyclables are initially processed at the Shoreway Recycling and Disposal Center and then transferred to the Ox Mountain Landfill. San Carlos Municipal Code Chapter 8.05 requires construction projects over $50,000 to enter into a Construction and Demolition Waste Management Plan Agreement with the City. The existing commercial building on-site is estimated to generate approximately 461 pounds of waste per day.[111]

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have insufficient 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 does not have 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) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

[111] California Air Pollution Officers Association (CAPCOA). CalEEMod. May 2023.

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

Water

The proposed project would generate a water demand of approximately 30,568 gpd.[112] The proposed project would rely on the existing water delivery system to supply water to the site, similar to existing conditions. As discussed under checklist question b. below, the project would incrementally increase water demand in the City but would not require additional water supply other than what is currently estimated in the most recently adopted UWMP. No relocation or construction of water facilities is required by the proposed project. The project proposes lateral connections to the existing water line in El Camino Real. Lateral connections to existing water lines would occur during grading of the site and would not result in significant environmental effects.

Wastewater

As discussed in Section 3.2.4 Utility Improvements, the project would include construction of a new eight-inch sanitary sewer line in El Camino Real that extends from the approximate middle of the project site to the adjacent parcel to the south. The sanitary sewer line would serve the increased sewer demand of the proposed project and the existing demand of the adjacent parcel to the south, replacing an existing sewer line on-site that connects the two parcels. The proposed sewer line would be located within the existing El Camino Real right-of-way and require an encroachment permit from Caltrans. The environmental effects associated with construction and operation of the sewer line are discussed throughout this Initial Study. As discussed in Sections 4.1 through 4.13, implementation of the proposed project (which includes the proposed sewer line) would not result in significant environmental effects.

Operation of the proposed residential building would generate approximately 29,040 gpd of wastewater.[113] The SCVW Plant currently has approximately 9.5 mgd of excess wastewater treatment capacity. According to the General Plan EIR, there would be sufficient capacity at the SCVW Plant to meet the projected wastewater generation associated with full build out under the General Plan and any future improvements to the SCVW Plant would be subject to environmental review pursuant to CEQA. Therefore, wastewater from the proposed project would be treated at the SCVW Plant, which has adequate capacity to accommodate the increased demand created by the project. Since the proposed development is consistent with planned growth in the City, the project would not require expansion or relocation of the existing City infrastructure. In addition, the project would comply with CALGreen requirements and the City's Private Sector Green Building

[112] For the purposes of this initial study, wastewater flow rates are assumed to be 95 percent of the total site water use due to the limited landscaping. Wastewater flow rates are estimated to be 29,040 gpd. Source: CBG. *Sanitary Sewer Analysis, 11 El Camino Real, San Carlos, California*. December 22, 2022.
[113] Ibid.

Policy which includes water conservation measures to reduce water demand and wastewater generation. As a result, relocation or construction of new or expanded water facilities would not be required.

Stormwater

The project site is currently developed with a commercial building and associated paved parking. Runoff from the project site currently enters the storm drainage system untreated and unimpeded. The project proposes to construct a new multi-family residence with 242 units. The project would reduce the total impervious surfaces on-site by 3,848 square feet, resulting in a total of 85,378 square feet of impervious surfaces (89 percent of total area), and 10,454 square feet (11 percent) of pervious surfaces. The proposed project would connect to the existing storm drain in the Caltrain property to the east of the project site. The project would include self-retaining areas along the perimeter of the site and within the podium level courtyards designed to capture and filter stormwater prior to discharge into the storm drainage system, consistent with the MRP. For these reasons, development of the project site would not exceed the capacity of the existing storm drainage system serving the project site.

Electric Power, Natural Gas, and Telecommunication Facilities

The project would utilize existing utility connections to connect to the City's electric and telecommunications systems. No natural gas would be used by the project in compliance with the City's Reach Code. Although the project would increase the demand for existing facilities in the City, the relocation of existing or construction of new facilities would not be needed to serve the proposed project. As a result, the proposed project would have a less than significant impact on these facilities.

For the reasons discussed above, the proposed project would not require or result in relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. **(Less than Significant Impact)**

b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As mentioned above, the existing commercial building is estimated to use approximately 3,396 gpd of water. The proposed project would result in the construction of 242 new residential units and would use approximately 30,568 gpd of water, a net increase of 27,172 gpd above existing conditions on-site.

As discussed above, the UWMP was developed based on the ABAG's 2040 population, housing, and employment projections and did not include the updated housing and employment projections in the City's Focused General Plan Amendment. Therefore, only a portion of the water demand associated with the project's proposed 242 residential units was accounted for in the UWMP and the project would result in an incremental increase in water demand beyond what was assumed in

the UWMP. The UWMP found sufficient water supplies would be available during normal years; however, shortfalls would occur during single-dry, and multiple-dry years within its service area without conservation measures.[114] In accordance with Section 10632(a) of the California Water Code, the UWMP included a water shortage contingency plan that includes annual water supply and demand assessment and conservation measures to address supply deficiencies, should one occur. Conservation measures include mandatory and voluntary measures such as increasing educational programs regarding water supply, development of drought ordinances, increased monitoring of water use, flow restrictions for high water users, mandatory conservation, restricting potable water use for landscape, and service shutoffs for repeat offenders.

While the UWMP indicated water supply deficiencies during single- and multiple- dry years, the water conservation measures under the UWMP as described above, along with the City of San Carlos measures related to water conservation, would ensure adequate supply of water to serve the project and reasonably foreseeable future development. For example, Section 18.18.080, Water Efficient Landscaping and Irrigation, of the City's Municipal Code requires landscaping to be designed and plants selected so that water use is minimized. In addition, the project would be constructed according to the most recent CALGreen requirements for water efficiency and conservation measures such as installing low flow toilets and faucets. For these reasons, sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal and dry years. **(Less than Significant Impact)**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed under checklist question a, the project would generate approximately 29,040 gpd of wastewater.[115] This is a net increase of 25,644 gpd over existing conditions on-site.[116] The SCVW Plant currently has approximately 9.5 mgd of available wastewater treatment capacity. Therefore, the SCVW Plant has adequate capacity to accommodate the increased demand created by the project. In addition, the project would comply with CALGreen requirements and the City's Private Sector Green Building Policy which includes water conservation measures to reduce water demand and wastewater generation. As a result, the project would not result in a determination by a wastewater treatment provider that it does not have adequate capacity to serve the project's demand in addition to existing commitments. **(Less than Significant Impact)**

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

[114] California Water Service. *2020 Urban Water Management Plan, Mid Peninsula District.* June 2021. Page 94-96.
[115] CBG. *Sanitary Sewer Analysis, 11 El Camino Real, San Carlos, California.* December 22, 2022.
[116] Existing development wastewater generation 3,396 gpd – proposed project wastewater generation 29,040 gpd = 25,644 gpd increase.

reduction goals?

Solid waste would be generated during project construction and operation. Construction of the proposed project would involve the generation of construction debris from demolition of the existing building and the removal of hardscaped surfaces, trees, and other landscaping. Through the process of acquiring building, utility, and site permits from the City, the proposed project would be required to comply with the state's construction waste diversion program, which ensures that 65 percent of construction waste is diverted from landfills. Material that cannot be recycled or reused would be transported to the Ox Mountain landfill, or to other regional landfills.

During operations, the project is estimated to generate approximately 980 pounds of solid waste per day, an increase of 520 pounds per day compared to existing conditions on-site.[117] The project would comply with City policies which include measures to reduce solid waste generation from development projects. As noted in Section 4.14.1.2 Existing Conditions, Ox Mountain landfill has a remaining capacity of 22 million cubic yards, with an estimate closure year of 2034.[118] Therefore, the project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure. **(Less than Significant Impact)**

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

The proposed project would increase development and would generate additional solid waste compared to existing conditions on-site. The project would be required to conform to City plans and policies to reduce solid waste generation, including the state's construction waste diversion program. For these reasons, the project would comply with the standards set forth in state and City policies and plans related to solid waste. **(Less than Significant Impact)**

[117] Appendix A.

[118] CalRecycle. "SWIS Facility/Site Activity Details, Corinda Los Trancos Landfill (Ox Mountain) (41-AA-0002)." Accessed April 6, 2023. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223

4.15 Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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?

As discussed in the individual resource sections of this Initial Study, the proposed project would not degrade the quality of the environment with the implementation of identified conditions of approval. The project would implement conditions of approval to ensure potential disturbance of nesting birds and raptors, potential disturbance of unrecorded archaeological resources, and potential exposure of construction workers, the environment, and future residents to existing contaminated soil and soil vapor on-site would be less than significant. **(Less than Significant Impact)**

b) Does the project have impacts that are individually limited, but cumulatively considerable?

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." In addition, under Section 15152(f) of the CEQA Guidelines, where a lead agency has determined that a cumulative effect has been adequately addressed in a prior EIR, the effect is not treated as significant for purposes of later environmental review and need not be discussed in detail.

Because criteria air pollutant and GHG emissions would contribute to regional and global emissions of such pollutants, the BAAQMD thresholds used by the City of San Carlos were developed such that a project-level impact would also be a cumulatively considerable impact. The project would not result in a significant emissions of criteria air pollutants or GHG emissions under BAAQMD thresholds and, therefore, would not make a substantial contribution to cumulative air quality or GHG emissions impacts. The discussion of project criteria pollutant impacts presented in Section 4.1 also reflects cumulative conditions, and the project would not contribute to significant cumulative impacts. The project's contribution to cumulative climate change impacts was presented in Section 4.6 as less than cumulatively considerable. Similarly, the discussion of the project's energy impact also reflects cumulative conditions, since the project's consumption of electricity, natural gas, and gasoline was assessed in comparison with consumption at the state and county level. Therefore, the proposed project would not make a substantial contribution to cumulative air quality, energy use, or GHG emissions impacts.

The project would not impact agricultural or forestry resources or mineral resources, therefore there is no potential for cumulative impacts to these resources. Nor are there any cumulative impacts associated with wildfire risk, as the project site is not located in or near a state responsibility area or lands classified as very high fire hazard severity zones.

The project would result in less than significant impacts to aesthetics, hydrology and water quality, land use, population and housing, public services, recreational facilities, transportation, and utilities and service systems without the imposition of mitigation measures. As noted in Section 4.12 Transportation, the project is located within ½ mile of El Camino Real and is presumed to have a less than significant VMT impact. For this reason, the project would not contribute to cumulative VMT impacts. The proposed project would result in less than significant and highly localized and temporary biological, cultural, geology and soils, hazards and hazardous materials impacts during construction. All planned or approved projects would be subject to the restrictions placed on the taking of birds protected by the Migratory Bird Treaty Act and California Fish and Game Code and special-status species bats, and any trees removed by other projects within the City would be replaced in accordance with the City's Municipal Code. Cumulative projects would also be subject to

Standard Permit Conditions that protect subsurface archaeological and paleontological resources. Accordingly, with implementation of the mitigation measures identified in this Initial Study, construction-level impacts would be mitigated to a less than significant level and would not be considered cumulatively considerable. Therefore, the project would not contribute to a significant cumulative impact on these resources.

Cumulative Health Risks Impacts

A cumulative health risk assessment was completed for the project and all substantial sources of TACs that can affect sensitive receptors located within 1,000 feet of the project site. These sources include freeways or highways, busy surface streets, railroad lines, and stationary sources identified by BAAQMD (refer to Figure 4.15-1). One pending development project, the 642 Quarry Road Life Science Project, was identified within 1,000 feet of the proposed project which could result in cumulative health risk impacts when combined with the proposed project. This project proposes construction of two six-story buildings for research and development lab and office uses and an eight-level parking structure. Although the project has not been approved, it is currently undergoing environmental review, and the exact timing of construction is not known, the health risks impacts from construction of this project were conservatively assumed to be included in this cumulative health risk assessment. No other pending or approved projects are located within 1,000 feet of the proposed project.

Mobile Sources

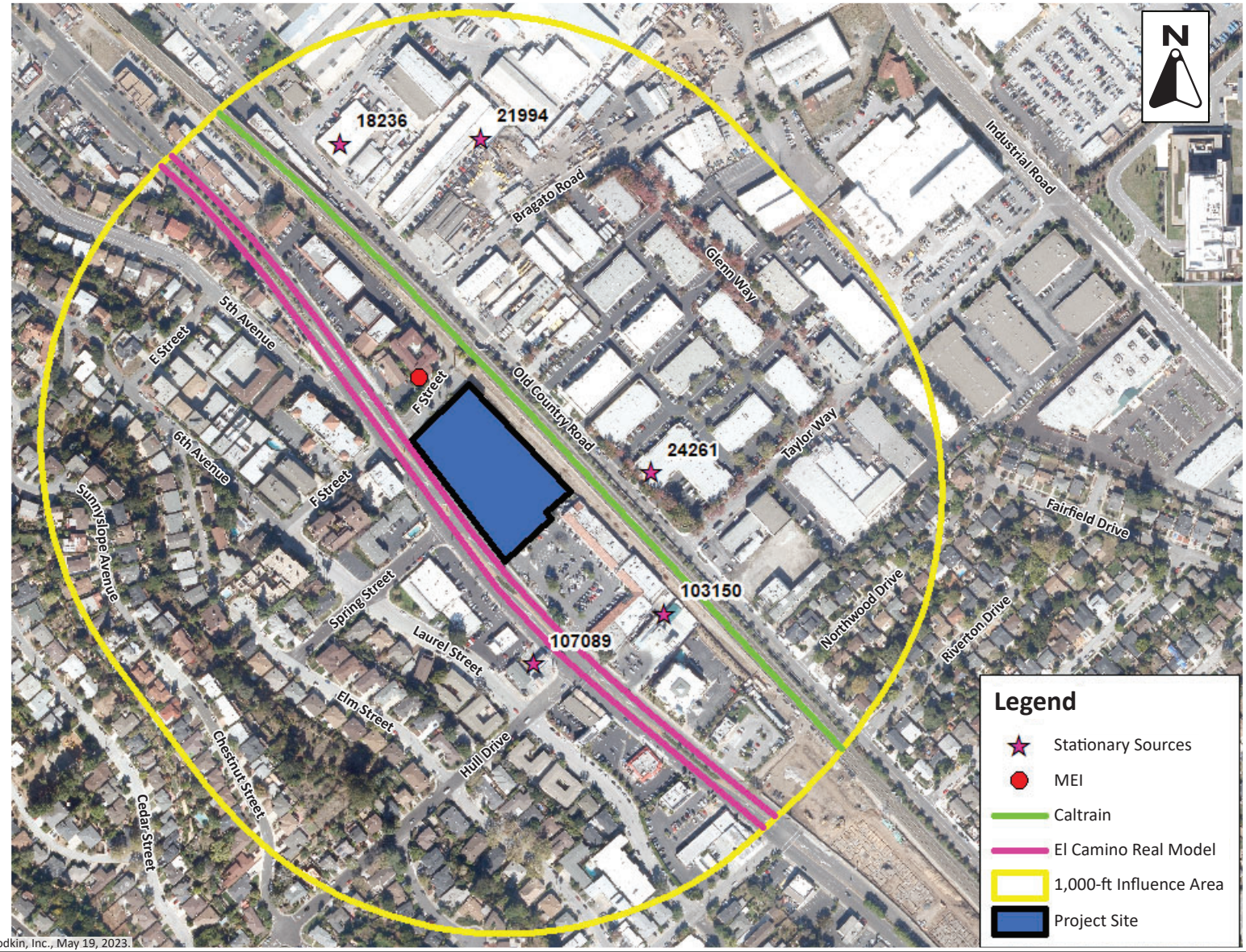
A review of the provided traffic information indicated that El Camino Real has a volume of more than 10,000 vehicles per day and is considered a source of TACs. In addition, the project site is located approximately 50 feet west of the Caltrain and Union Pacific Railroad lines. Rail activity on these lines currently generates TAC and $PM_{2.5}$ emissions from locomotive exhaust. Currently all of Caltrain's passenger trains use diesel locomotives, however, in January 2015, Caltrain adopted the Peninsula Corridor Electrification Project which would convert the existing diesel-powered fleet to electric locomotives. Under the Peninsula Corridor Electrification Project, beginning in 2024, there would be 24 daily weekday trips and four daily weekend trips using trains with diesel locomotives.[119] On an annual average basis this would be an average of 18 daily trains using diesel locomotives. Use of these diesel trains by Caltrain between San Francisco and San Jose would be phased out over time and replaced by electric trains. All trains used for freight service were assumed to use diesel powered locomotives and now and in the future.

Stationary Sources

Five stationary sources of TAC emissions were identified using the BAAQMD's Stationary Source Risk & Hazard Analysis Tool. Of the five sources identified, four were automotive repair and fueling stations and one was a coffee and tea manufacturing facility.

The results of the cumulative health risk assessment are shown in Table 4.15-1.

[119] Caltrain 2015. *Short Range Transit Plan: FY2015-2024*. October 1, 2015.



Source: Illingworth & Rodkin, Inc., May 19, 2023.

LOCATION OF PROJECT SITE AND NEARBY TAC SOURCES | FIGURE 4.15-1

Table 4.15-1: Cumulative Community Risk Impacts at the Project MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m_3$)	Hazard Index
Project Impacts			
Total/Maximum Project Impacts (Years 0 -30)	2.75 (infant)	0.02	<0.01
BAAQMD Single-Source Threshold	*10*	*0.3*	*1.0*
Exceeds Threshold?	**No**	**No**	**No**
Cumulative Impacts			
El Camino Real, ADT 30,505	4.30	0.25	<0.01
Caltrain	37.5	0.14	
642 Quarry Road Project Construction	6.0	0.02	<0.01
Rod'z Auto Body dba.: Marks Body Shop (Facility ID#18236, Automotive Body, Paint, and Interior Repair and Maintenance) MEI at 650 feet	-	-	<0.01
Pang Pang Auto Body Shop (Facility ID #21994, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 610 feet	-	-	<0.01
Silicon Valley Coffee LLC (Facility ID #24261, Coffee and Tea Manufacturing), MEI at 610 feet	<0.01	<0.01	-
Auto Pride Wash (Facility ID#103150, Gas Dispensing Facility), MEI at 910 feet	0.19	-	<0.01
Justin Chevron (Facility ID#107089, Gas Dispensing Facility), MEI at 820 feet	0.72	-	<0.01
Combined Sources	<51.47	<0.44	<0.07
BAAQMD Cumulative Source Threshold	*100*	*0.8*	*10.0*
Exceed Threshold?	**No**	**No**	**No**
Source: Appendix A			

As shown in Table 4.15-1 above, the project would not exceed the cumulative source thresholds for cancer risk, annual $PM_{2.5}$ concentrations, or hazard index. Therefore, the project would result in a less than significant cumulative community health risk impact.

Cumulative Noise Impacts

Cumulative noise impacts would include either cumulative traffic noise increases under future conditions or temporary construction noise from cumulative construction projects. A significant cumulative traffic noise increase would occur if two criteria are met: 1) if the cumulative traffic noise level increase was three dBA Ldn or greater for future levels exceeding 60dBA Ldn or was five dBA Ldn or greater for future levels at or below 60 dBA Ldn, and 2) if the project would make a cumulatively considerable contribution to the overall traffic noise increase. A cumulatively considerable contribution would be defined as an increase of one dBA Ldn or more attributable solely to the proposed project.

The traffic study included peak hour turning movements under cumulative conditions (no project), and cumulative plus project conditions for each study intersection in the project vicinity. These two traffic scenarios were compared to the existing traffic volumes to determine the noise level increase. There were no roadway segments with a three dBA Ldn or more increase. Therefore, the project would not result in a cumulatively considerable contribution to the overall noise increase. This would be a less than significant impact.

As noted under Cumulative Health Risk Impacts, a review of the Cities of San Carlos and Belmont's websites showed that there is one cumulative development project located within 1,000 feet of the project site: 642 Quarry Road Life Science Project, located at 642 Quarry Road, approximately 860 feet northeast of the project site. Due to its location in relation to the proposed project, there are no shared receptors with direct lines of sight to both this cumulative project and the proposed project. Therefore, potential cumulative construction noise impacts would be less than significant. **(Less than Significant Impact)**

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

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include construction TACs and noise. However, implementation of conditions of approval, and City policies would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified. **(Less than Significant Impact)**

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

Arcadis. Limited Phase II Environmental Site Investigation Memorandum. June 21, 2021.

Arcadis. Phase I Environmental Site Assessment Report, CVS Pharmacy, 11 El Camino Real, San Carlos, California. June 7, 2021.

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

BAAQMD. Final 2017 Clean Air Plan. April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

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CalEPA. Cortese List Data Resources. Accessed April 4, 2023. https://calepa.ca.gov/sitecleanup/corteselist.

CalFire. San Mateo County Local Responsibility Area Fire Hazard Severity Zones. November 24, 2008.

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Section 6.0 Lead Agency and Consultants

6.1 Lead Agency

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Section 7.0 Acronyms and Abbreviations

2017 CAP	Bay Area 2017 Clean Air Plan
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos-Containing Material
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
Amsl	Above mean sea level
APN	Assessor's Parcel Number
ATCM	Asbestos Airborne Toxic Control Measure
BAAQMD	Bay Area Air Quality Management District
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bay Area	San Francisco Bay Area
Bgs	Below ground surface
Btu	British Thermal Unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal Water	California Water Service
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act

CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	Methane
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
Construction General Permit	General construction permit for the State of California
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
EV	Electric vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FAR Part 77	Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	Greenhouse Gases
GHGRS	Greenhouse Gas Reduction Strategy
GWh	Gigawatt Hour
GWP	Global Warming Potential

Habitat Plan	Santa Clara Valley Habitat Plan
HFCs	Hydrofluorocarbons
HSWA	Hazardous and Solid Waste Amendments
HSP	Health and Safety Plan
HVAC	Heating, cooling, and ventilation
IWMP	Integrated Waste Management Plan
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
LID	Low Impact Development
L_{max}	Maximum A-weighted noise level during a measurement period
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MEI	Maximally exposed individual
Mgd	Million gallons per day
MLD	Most likely descendant
$MMTCO_2e$	Million Metric Tons of Carbon Dioxide Equivalent
MND	Mitigated Negative Declaration
mpg	Miles per Gallon
MRP	Municipal Regional Stormwater NPDES Permit
MRZ	Mineral Resource Zone
MSL	Mean Sea Level
MTC	Metropolitan Transportation Commission
MU-NB-120	Mixed-Use North Boulevard
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NO_2	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos

NOD	Notice of Determination
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NRHP	National Register of Historic Places
O_3	Ozone
OPR	Office of Planning and Research
PCB	Polychlorinated Biphenyls
PCE	Peninsula Clean Energy
PCF	Perfluorocarbon
PDA	Priority Development Areas
PFCs	Perfluorocarbons
PG&E	Pacific Gas and Electric Company
PM	Particulate Matter
PM_{10}	Particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	Particulate matter with a diameter of 2.5 microns or less
PPV	Peak Particle Velocity
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
SCSD	San Carlos School District
SF_6	Sulfur Hexafluoride
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board
SMP	Site Management Plan

SO_x	Sulfur Oxides
SR	State Route
SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Program
SWRCB	State Water Resources Control Board
SVCW	Silicon Valley Clean Water
TAC	Toxic Air Contaminants
TDM	Transportation Demand Management
Title 24	Title 24, Part 6 of the California Code of Regulations
TMDL	Total maximum daily load
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
Williamson Act	California Land Conservation Act
WUI	Wildland-Urban Interface
ZNE	Zero Net Carbon Emission