

# **San Carlos' Focused General Plan Update Project: Land Use, Housing, Safety Element Updates and Accompanying Zoning Ordinance Amendments**

## **Summary of Comments on the Notice of Preparation**

### **PUBLIC OUTREACH**

Public outreach for the project included public noticing, issuance of a Notice of Preparation (NOP) for an Environmental Impact Report (EIR), and a public scoping meeting for the EIR, as summarized below. Comments received on the NOP and during the scoping meeting will be considered during the preparation of the draft EIR.

#### **Notice of Preparation**

A Notice of Preparation (NOP) is a document stating that an Environmental Impact Report (EIR) will be prepared for a particular project. The NOP is the first step in the EIR process and needs to be prepared immediately after deciding that an EIR is required for a project. The purpose of a NOP is to solicit comments on the scope and content of an EIR.

As required by CEQA Guidelines Section 15082, the City prepared a NOP and circulated it to agencies and made it available to the public on December 17, 2021 (SCH# 2021120442). The NOP contained a summary of the project description, a map depicting the project location, and salient environmental issues; and identified the purpose of the NOP process (to solicit input on the content of the EIR), how the NOP could be reviewed, and how to submit comments. Circulation of the NOP consisted of its filing with the San Mateo County Clerk's office, submittal to the State Clearinghouse for State Agency Distribution, and emailing the NOP to surrounding agencies, special districts serving the City of San Carlos, and all persons who had signed up to follow and/or attended previous community workshops regarding the project. In addition, an announcement of the availability of the NOP was published in the local newspaper (Examiner–Enquirer–Bulletin) on December 22, 2021.

The NOP was provided to the Governor's Office of Planning and Research State Clearinghouse for distribution to various State agencies for review. Copies of the NOP were made available electronically via a web link on the City's website. The City provided a concurrent 45-day public review period for the NOP from December 17, 2021 to January 31, 2022.

Written comments in response to the NOP were received from two (2) agencies, including the California Department of Transportation (Caltrans) and Native American Heritage Commission (NAHC), and seven (7) individuals during the NOP comment period.

On January 12, 2022, the City held a NOP scoping meeting via Zoom in front of the Planning Commission that gave the public a chance to provide input on potential environmental effects that should be evaluated as part of the EIR. No formal decision by the Planning Commission was made at the meeting.

The following agencies and individuals submitted comments on the NOP within the designated public comment period.

#### Agencies

- Native American Heritage Commission (NAHC), Katy Sanchez, Associate Environmental Planner
- California Department of Transportation (Caltrans), Mark Leong, District Branch Chief

## Individuals

- Dimitri Vandellos
- David Crabbe
- Sandra Wallace
- Gina Vandellos
- Gladwyn d'Souza
- Ralph Althouse
- Sean Gibson

## **Summary of Comments Received**

The following bullet points summarize topics raised by the commenters. Comments that do not pertain to the **scope** (i.e., what should be evaluated or addressed within the EIR) of the EIR are not included. Several comment letters raised questions about the location of housing proposed in the Housing Element. Since these comments are focused on the proposed project and not the content of the EIR, they have not been included in this summary.

## General Topics

- Description of relationship between General Plan elements in the Draft EIR;
- Traffic and traffic patterns, water supply availability, and school district impacts as part of the EIR scope and study;
- Specific proposal the Draft EIR will evaluate;
- [Building] height and setbacks on East San Carlos Avenue considered in the Draft EIR;
- Alternative designs considering duck-outs and bus only lanes on El Camino Real considered in the Draft EIR; and
- Housing considered in the Draft EIR that could be approved without future site-specific EIR (i.e., "by right").

## Cultural Resources/Tribal Cultural Resources

- Requirements for compliance with AB 52 and SB 18, and mitigation of cultural resources and tribal cultural resources; and
- Recommendations for conducting cultural resources assessments.

## Land Use

- Analyze the project in light of the East Side Innovation District Vision Plan; and
- Analyze proposed zoning changes and impacts to single-family housing.

## Hydrology/Hazards

- Analyze impacts of Sea Level Rise; and
- Analyze effects of rising groundwater from SLR and transport of hazardous chemicals in the groundwater.

## Transportation/Traffic

- VMT analysis requirement if project does not meet City's adopted VMT screening criteria;

- Requirement for VMT mitigation, if any, to support use of transit and active transportation modes;
- Requirement for Draft EIR to include transportation impact analyses with applicable mitigation for any additional or re-zoning of improvements adjacent to Caltrans' Right-of-Way (ROW);
- Requirement for a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area;
- Requirement for draft EIR to identify in text and graphics existing and proposed improvements for the pedestrian, bicycle, and transit networks;
- City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN);
- Ability of Caltrain to accommodate increase in ridership; and
- Analyze walkability and bicycle safety in the City.



## NATIVE AMERICAN HERITAGE COMMISSION

December 20, 2021

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

CHAIRPERSON  
**Laura Miranda**  
Luiseño

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**Stanley Rodriguez**  
Kumeyaay

EXECUTIVE SECRETARY  
**Christina Snider**  
Pomo

**NAHC HEADQUARTERS**  
1550 Harbor Boulevard  
Suite 100  
West Sacramento,  
California 95691  
(916) 373-3710  
[nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
[NAHC.ca.gov](http://NAHC.ca.gov)

**Re: 2021120442, Environmental Impact Report for the Focused General Plan Update: Housing, Land Use, & Safety Elements and Accompanying Zoning Ordinance Amendments Project, San Mateo County**

Dear Ms. Porras:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a.** A brief description of the project.
  - b.** The lead agency contact information.
  - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
  
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
  - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
  
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a.** Alternatives to the project.
  - b.** Recommended mitigation measures.
  - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).
  
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
  - a.** Type of environmental review necessary.
  - b.** Significance of the tribal cultural resources.
  - c.** Significance of the project's impacts on tribal cultural resources.
  - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
  
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
  
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
    - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
    - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - i.** Protecting the cultural character and integrity of the resource.
    - ii.** Protecting the traditional use of the resource.
    - iii.** Protecting the confidentiality of the resource.
  - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
  - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
  - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
  - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPA.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPA.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.



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## California Department of Transportation

DISTRICT 4  
OFFICE OF TRANSIT AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



January 25, 2022

SCH #: 2021120442  
GTS #: 04-SM-2021-00408  
GTS ID: 25110  
Co/Rt/Pm: SM/82/6.45

Lisa Porras, Planning Manager  
City of San Carlos  
600 Elm Street  
San Carlos, CA 94070

### **Re: Environmental Impact Report for the City of San Carlos Focused General Plan Update: Housing, Land Use and Safety Elements and Accompanying Zoning Ordinance Amendments Notice of Preparation (NOP)**

Dear Lisa Porras:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Environmental Impact Report for the City of San Carlos Focused General Plan Update: Housing, Land Use and Safety Elements and Accompanying Zoning Ordinance Amendments Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the December 2021 NOP.

#### **Project Understanding**

The project includes the preparation of the City of San Carlos General Plan Housing, Land Use and Safety Element Updates. The Land Use Element will be revised to ensure General Plan consistency, as required by State law. In addition, Zoning Amendments will also be made to implement new policies and land use intensities envisioned in the Housing Element Update to accommodate the provision of additional housing needs as part of San Carlos' Regional Housing Needs Allocation (RHNA). The project encompasses the entire City and is located along segments of State Route (SR)-84 (El Camino Real), United States Route (US)-101, and Interstate (I)-280.

#### **Travel Demand Analysis**

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and

multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' [Transportation Impact Study Guide](#).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in align with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the Draft Environmental Impact Report (DEIR), which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the General Plan area roadways.
- The General Plan's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Additionally, Caltrans requests the City include transportation impact analyses with applicable mitigation for any additional or re-zoning of improvements adjacent to Caltrans' Right-of-Way (ROW).

### **Mitigation Strategies**

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the proposed project site is identified as a Close-in Compact Community where community design is moderate and regional accessibility is strong.

Given the place, type and size of the project, the DEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have

been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Addition/ Increase in number of affordable housing units in project;
- Orientation of project towards non-auto corridor;
- Location of project near bicycle network;
- Incorporation of bicycle lanes in street design;
- Pedestrian network improvements;
- Traffic calming measures;
- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;
- Limiting parking supply;
- Unbundled parking from property costs;
- Implementation of Urban Non-Motorized Zone
- Market price public parking;
- Ridesharing programs, Commute Trip Reduction programs, bike sharing programs;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit access supporting infrastructure (including bus shelter improvements and sidewalk/ crosswalk safety facilities);
- VMT Banking and/or Exchange program; and
- Bike parking near transit facilities.

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

### **Transportation Impact Fees**

We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to work with the

City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Please identify in text and graphics existing and proposed improvements for the pedestrian, bicycle, and transit networks. The City should estimate the cost of needed improvements, expansion, and maintenance for the Plan area, as well as identify viable sources of funding, correlated with the pace of improvements, and a scheduled plan for implementation along with the DEIR.

### **Lead Agency**

As the Lead Agency, the City of San Carlos is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

### **Equitable Access**

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

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



MARK LEONG  
District Branch Chief  
Local Development Review

c: State Clearinghouse

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**From:** Dimitri Vandellos

**Sent:** Thursday, January 27, 2022 5:56 PM

**To:** Don Bradley <DBradley@cityofsancarlos.org>; Kristen Clements <KClements@cityofsancarlos.org>; Ellen Garvey <EGarvey@cityofsancarlos.org>; Jim Iacoponi <JIacoponi@cityofsancarlos.org>; David Roof <DRoof@cityofsancarlos.org>; Laura Parmer-Lohan <lparmerlohan@cityofsancarlos.org>; Sara McDowell <SMcDowell@cityofsancarlos.org>; Ron Collins <RCollins@cityofsancarlos.org>; John Dugan <JDugan@cityofsancarlos.org>; Adam Rak <ARak@cityofsancarlos.org>; Lisa Porras <LPorras@cityofsancarlos.org>

**Cc:**

**Subject:** Feedback for the Focused General Plan Update: Housing, Land Use, Environmental Safety Elements and Accompanying Zoning Ordinance Amendments Environmental Impact Report

[**NOTICE:** This message originated outside of City of San Carlos -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Esteemed Planning Commission and City Council members:

I am providing the following feedback that has been reviewed by the GESC Board as a response to the planning commissions special meeting on January 12, 2022 regarding the following agenda item:

- Scoping Meeting for the Focused General Plan Update: Housing, Land Use, Environmental Safety Elements and Accompanying Zoning Ordinance Amendments Environmental Impact Report

We are providing our input on potential environmental effects that should be evaluated as part of the Environmental Impact Report (EIR) for the Focused General Plan Update as well as our take that the request for EIR feedback seems premature given that no specifics were provided as to the specific zoning changes being considered at the Special Planning Commission meeting.

Without understanding the density changes and whether or not height or

setback changes are being proposed, it makes it difficult to determine what our EIR focus should be. So for example we have not gone into any detail regarding traffic and traffic patterns, water supply availability, school district impacts and other issues because without a clear outline and a published plan we cannot provide specific meaningful feedback on those critical issues. They however need to be considered as part of the EIR scope and study.

With that said our feedback is broken down into the following sections:

- Zoning Code Changes
- Incorporating the East Side visioning discussions regarding housing
- Old County Road and East San Carlos Avenue density changes
- Toxics and a rising water table

Additionally we are providing the:

- GESC Community Vision outline
- East Side Visioning feedback outline regarding the Biotech Developments
  - As a reference and which we feel are critical to incorporate as part of a larger holistic vision for San Carlos as a whole and the GESC neighborhood specifically.
- With that background in place here is our feedback.

### **Zoning Code Changes**

- Zoning Code changes were not described in the meeting, were not described in the pamphlet, and do not exist on the San Carlos 2040 website but the meeting was about identifying the EIR impacts to the proposed zoning changes.
- How do you identify impacts without explaining what is being proposed?
- It is difficult to evaluate the impacts without understanding the specific zoning changes.
- The San Carlos 2040 web site does not have any information regarding these proposed changes.
- These proposed changes either do not exist or are being withheld from the public.
- The area on the west side of El Camino has a grey color but there is no zoning associated with that color in the table.
- What exactly is being proposed on the west side of El Camino between Holly and Brittan in the grey shaded areas?

- Please provide a detailed explanation of the proposed zoning code changes for each zoning land use designation along the El Camino corridor, East San Carlos Avenue and Old County Road including but not limited to any possible height, building footprint, setbacks and density changes.
- We are concerned that the city is jumping to EIR feedback without a specific proposal to evaluate

### **Incorporating the East Side visioning discussions regarding housing**

- This initial report does not tie in with the requests for increased housing closer to the employment centers in the East Side Study sessions that we attended .
- Why is there no proposed housing for Tanklage, Terminal, or Old County Road South of Terminal or in the area immediately adjacent to the proposed new Alexandria Campus as part of the San Carlos 2040 General Plan Update?
- This was discussed during the east side visioning meetings and was specifically requested by the city council.
- This proposal does not mention or link the request we made for increased density south of our neighborhood in exchange for lowering or keeping the same density for Old County and East San Carlos Ave as we suggested.
- We would like to see the housing element changes discussed in relationship to the East Side Visioning discussions many of us attended and an acknowledgement of the increased housing pressure that the new commercial developments will bring to bear on our city.

### **OCR and East San Carlos density changes are an existential threat to the single family GESC Community**

- We have a concern about the planning commission obliquely trying to include changes to single family residences in San Carlos.
- There was an implication (that we inferred) that the GESC neighborhood was being targeted for zoning changes because of our proximity to the Caltrain station.
- Ironically getting to Redwood City or Belmont to do shopping is a near impossibility using Caltrain.
- By the time you incorporate walking to a store shopping and then finding a train to get back a 20 minute trip by car will take you 2 hours or more.

- Using the Caltrain station as a rationale to increase density in our community feels like a mechanism to preclude other neighborhoods from absorbing rezoning and or increased density.
- While we may have a train station in San Carlos, the Caltrain schedule does not support the running of errands, food shopping or getting around the peninsula for non-work purposes because Caltrain and Samtrans ignores those users in favor of commuters to and from San Jose, Mountain View, Palo Alto, Millbrae and San Francisco.
- As someone who used to use Caltrain on a daily basis to commute to work for decades I truly wish the service would help people run errands along the peninsula and be a decent alternative to getting into a car, but it does not.
- Basing housing density decisions on magical thinking that we have a functional mass transit system without looking into the details is not a rationale for threatening our neighborhood.
- If we as a community (after having an open and honest debate) decide to build significant levels of high density housing along Old County Road and East San Carlos in order to preserve west side residents neighborhoods then we should have an open and frank discussion about rezoning the single family neighborhood south of Holly for significantly higher density and come up with a plan for an orderly transition from a single family neighborhood to one filled with apartment and condo complexes that will allow and facilitate the community to sell their properties at a significantly increased amount.
- We want to ensure that no one in our community will be ripped off by unscrupulous developers looking for quick profits by buying our homes at a discount and building high density units..

### **Toxics and a rising water table**

- This was discussed extensively in previous meetings but was not mentioned in this proposal.
- As the water table rises due to global warming before we have flooding disasters we will have the potential for new toxic crises similar to Flint, Michigan or Love Canal due to the water table rising.
- What specific studies will the EIR incorporate to evaluate the risks associated with rising water tables due to high rain events and sea level rise which will affect the water table given the high number of toxic sites in the east side?
- We are particularly concerned about the underground aquifers getting

contaminated from these sites and leaching onto our single family neighborhood.

- <https://www.nbcbayarea.com/investigations/toxins-long-buried-may-surface-as-groundwater-rises/2718842/>

The GESC vision document has been distributed previously and we are including it here in our feedback as a reminder to show that our position has been consistent throughout the years and that we have been working hard to come up with solutions that allow for economic development while keeping our community intact.

### **GESC Community Vision**

1. Preserve integrity of Greater East San Carlos single family residential community while allowing both residential and commercial development in the industrial areas
  - Reduce the hard edges of incompatible land use between the residential neighborhood and the industrial areas by creating transition and buffer zones with trees between the single family homes and other uses along East San Carlos, Hall, Terminal, Northwood, Taylor.
  - Tree lined streets in the residential area south of Holly to mitigate the impacts of building height of the new commercial BioTech developments.
  - Improve pedestrian connections between North and South of Holly
2. Transform East San Carlos Avenue from industrial to single family homes or two story town homes
  - We have the opportunity to leverage Alexandria into buying up the East San Carlos parcels and creating housing that will not destroy the character of the GESC Community
3. Partial cul-de-sacs south of Holly for traffic mitigation
  - Start a trial run now, determine what works and then work with the community on what a permanent solution looks like
4. Laureola Park expansion
  - Buy the HS property to expand open space on the East Side
5. Full environmental remediation on all development projects
  - This is a generational opportunity to right the wrongs of the previous generations environmental neglect
  - This will ultimately save the city money as we will not pay fines for polluting the bay via Pulgas creek and the toxic plumes under the

industrial properties making their way towards the bay and perhaps our homes.

### **East Side Biotech Development overall community mitigations and goals**

- Create a walkable, bike rideable community with open space
- Tree lined streets for all south of Holly residential streets (blocks visibility of tall buildings, reduces carbon footprint)
- Review pedestrian/bicycle improvements for the east side and incorporate community feedback into a traffic/pedestrian/bicycle master plan
- No shuttles on East side, the Caltrain multi-modal station was designed for this purpose
- Identify and agree on housing opportunities on the east side, the west side needs to share the burden of additional housing
- Plan for water table rise, sea level rise, flooding mitigations and toxic remediation for the east side including studying the underground aquifers and how toxics could be transferred to the residential community
- Prepare for changes to accommodate the significant increase in auto traffic that will be generated by the employment center(s).

The GESC Board greatly appreciates the time and effort each planning commission and city council member is taking to make sure we create a collaborative solution that works for San Carlos as a whole. I am more than happy to follow up with points of clarification on any of the above items and look forward to having discussions with each of you in the future.

Thank You,

Dimitri Vandellos - GESC President

Scot Marsters

Paul Magginette

Ben Fuller

Sam Herzberg

Tim Hilborn

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January 17, 2022

Planning Manager Lisa Porras:

Re: Housing & Safety Element Update EIR

Dear Lisa:

This is a follow-up letter to my public hearing comments last Wednesday.

1. I continue to be disappointed that the city refuses to recognize the real housing impact that can be anticipated by all the commercial developments on the East Side. Two million SF of Bio-Tech at 300 SF per job will produce about 6,700 jobs which would require about 4,500 new housing units<sup>1</sup> to maintain the city's current jobs / housing balance. Yet the city is still sticking with the RHNA number of 2,735 units. Also, just the RHNA numbers alone call for 1,177 of those units to be very-low and low- income units. Even if the city were to get the full 15% BMR units in the Planning Code for those RHNA units, it would only produce 410 units, well short of the RHNA goals. Even with the buffer, the city will be well short of BMR units.

This is a total disaster for jobs / housing "fit" in the city and needs to be addressed.

2. Another item that is not being addressed in the Housing Element update is the impact of the State's Density Bonus provisions. When a project gets a Density Bonus, yes it increases the overall number of units, but it dilutes the city's 15% BMR requirement by not allowing the city to calculate the BMR requirement for the total of all the units that were added. For example: 626 Walnut Street used the Density Bonus to increase the number of units from I believe 26 or 28 units to 35 units, but the number of BMR units was held at the number for the original density, not the increased density, thus there are only 10% BMR, not 15%. This is a flaw in the State law, but still affects the the BMR ratio overall.

3. It's still not clear in the Housing Element what proportion of future housing the city anticipates will be allow "by right" without a site specific EIR review. This is where an overall EIR for the General Plan could be used to allow development without a specific EIR for each project. RWC did this for their Downtown Plan.

4. Others expressed concern about how the few sites the city has designated for upzoning in the western hills will address the fire hazards in the WUI. I personally am not against upzoning some parcels in the hills and would be fine with additional condo development on the North Crestview Park site (which is just a few hundred feet from my house) if the city decided to go that way, but the fire hazard is a real issue.

5. Sea Level rise is still a big concern for the East Side as was illustrated in Wednesday night's slides showing various levels of SLR which in the extreme case could bring the bay all the way to El Camino. This not only applies to housing, but also applies to the commercial development in that area, but doesn't seem to be taken very seriously.

6. Finally, there was a robust discussion about "land value capture". I brought it up, but I believe the commissioners asked some good follow-up questions. The impression I got was that the planning staff felt there was nothing they could do to require "community benefits" (especially additional BMR units) in exchange for increased density because they cannot count the increased density as meeting RHNA if the increase is conditional. This is very unfortunate, because one way to come closer to meeting the RHNA goals for BMR units is to increase the % of BMR per project which is not possible without the city either increasing BMR to 20-25% by code or by making it a condition of increasing density project by project. I'd like the city to look more closely at this issue to see if there's a "loophole" where the promise of more BMR units per project could justify State approval of a Housing Element that includes "value capture".

Thanks for your consideration.

David Crabbe

cc: Chair Roof and Members of the Planning Commission, Al Savay, Jeff Maltbie

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<sup>1</sup> 1.5 jobs per housing unit

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**From:**  
**To:**  
**Subject:** FW: Housing and Safety Element Update EIR"  
**Date:** Monday, January 31, 2022 10:53:49 AM

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Comment on the NOP.

Today is the deadline; 5 pm.

-----Original Message-----

From: Sandra  
Sent: Sunday, January 30, 2022 5:30 PM  
To: Lisa Porras <LPorras@cityofsancarlos.org>  
Subject: Housing and Safety Element Update EIR"

[NOTICE: This message originated outside of City of San Carlos -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Please do all you can to maintain some semblance of single family home zoning.

I'd like to think I'm speaking for too many San Carlans who won't comment for many reasons. We're people who have worked hard to attain and maintain our suburban lifestyle. It is a choice that is being taken away from us because the internet took off from here and boomed and the population boomed as well.

There will be many proponents of development speaking up here. They have deep pockets and will outbid potential SFH homeowners and max out and flip properties purely for financial gain. They vastly outnumber people who simply want to add an ADU for extended family or modest income. Also consider how these changes will effect the tree canopy as trees are taken down for construction.

There are areas in town conducive to multi unit housing. Random infill is not the answer.

Please consider those of us who have called San Carlos home for a long time. We need protection from these ill-conceived state mandates that will change California's suburbs.

Thanks,

Sandra Wallace

Sent from my iPhone

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**From:** [Lisa Porras](#)  
**To:** [Barbara Beard](#); [Mike Campbell](#); [lisa.brownfield](#)  
**Subject:** FW: Focused General Plan feedback  
**Date:** Monday, January 31, 2022 3:36:45 PM

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NOP comment.

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**From:** Gina Vandellos  
**Sent:** Monday, January 31, 2022 2:44 PM  
**To:** Lisa Porras <LPorras@cityofsancarlos.org>  
**Subject:** Focused General Plan feedback

[**NOTICE:** This message originated outside of City of San Carlos -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Dear Lisa Porras,

I was very concerned after attending the last Special Planning Commission meeting regards to the Environmental Impact Report for the Focused General Plan. It is totally unclear what the specifics of the plan will be. What exactly will be allowed regarding height and setbacks on East San Carlos Avenue? What about traffic patterns and school district impacts?

Have you contacted the east side neighborhood to let them know your plans to re-zone the east side residential area? This major decision needs input from the residents. The San Carlos 2040 web site does not have any information regarding the proposed changes.

I would like to see the housing element changes discussed in relationship to the East Side Visioning discussions that I attended last year.

Thank you,

Gina Vandellos

Resident of the San Carlos east side

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To San Carlos Planning.

% Lisa Porras.

RE: Notice of Preparation for an Environmental Analysis for the San Carlos' Focused General Plan Update Project: Land Use, Housing, Safety Element Updates and Accompanying Zoning Ordinance Amendments.

1/31/2022

Thanks you for taking comments on the Notice Of Preparation for the San Carlos General Plan update.

Here are four items to consider in putting the plan together

- 1- Explain how the plan will achieve the state's Vehicle Miles Travelled (VMT) targets?
- 2- Explain how the plan will improve the financial bottom line of the transit district?
- 3- How will air and water pollution be reduced inline with state goals?
- 4- How will the city be safer to walk and bike to achieve VMT reduction goals?

1- The plan should explain how San Carlos will meet the [The California Air Resources Board determination](#) that local governments must achieve Vehicle Miles Travelled reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs).

The feasible alternative would be for the general plan to promote significant reductions in VMT via designs that

prioritize pedestrian movement in the half mile around the train center, add dense housing that is car free but include car, bike, and scooter share, and building a lot more affordable units.

On page 101 CARB says:

It is recommended that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities. It is important that VMT reducing strategies are implemented early because more time is necessary to achieve the full climate, health, social, equity, and economic benefits from these strategies.

2a- The plan should explain how the general plan will contribute to the financial improvement of Samtrans.

The feasible alternative would be to put in more transit captive affordable housing in the transit corridor and provide every transit corridor household resident with Samtrans and Caltrain passes while improving bus throughput on El Camino Real with a bus only lane and making walking to transit safer by eliminating automobiles on El Camino Real. Other feasible option would be use pricing to change mode share behavior such as congestion pricing parking within the corridor and improving first and last mile options with [shared micro mobility](#) would give consumers choice. The circulation

element should consider expanding residential permit parking pass for existing residents.

CARB says on pathways to implement the state level VMT reduction should include strategies such as:

"Developing pricing mechanisms such as road user/VMT-based pricing, congestion pricing, and parking pricing strategies." Page 81

" Provide energy-efficient affordable housing near job centers and transit." Page ES-6

2b- The EIR should evaluate these two alternative designs considering duck-outs and bus only lanes on El Camino Real for the:

- impacts to bus travel times, dwell times, and reliability
- impacts on car drivers' travel times and safety
- impacts on bicycle safety
- comparing the number of people impacted in all three cases

2c- The feasible alternative would be take a lane away from vehicles on El Camino Real and use it for pedestrian needs such as transit only lanes and last mile Micromobility connectors and changing signal timing to enhance pedestrian priority in the 1/2 mile radius around the Caltrain station. The changes would make it safer for pedestrians to access transit.

3. San Carlos should explain how the General Plan by 2030 will increase renewable power and reduce toxic emission around the transit center like Caltrain especially indoor air pollution impacting residents and water pollution from runoff.

The feasible alternative would be to ask for all electric passive construction to eliminate methane and it's burned effluent pollution indoors, eliminate air pollution from the lifetime emissions from the project through walking and biking priority, and meet the energy waste and water needs on site via microgrids for a resilient strategy to meet the recommendation of IPCC6 for staying within 1.5 deg of warming by 2030.

On page ES4 CARB provides this chart of pathways to meeting 2030 goals and Paris.

## CALIFORNIA'S CLIMATE POLICY PORTFOLIO



Double building efficiency



Cleaner freight and goods movement



50% renewable power



Slash potent "super-pollutants" from dairies, landfills and refrigerants



More clean, renewable fuels



Cap emissions from transportation, industry, natural gas, and electricity



Cleaner zero or near-zero emission cars, trucks, and buses



Invest in communities to reduce emissions



Walkable/Bikeable communities with transit

### On page 97 CARB says

- CARB will continue to actively implement the provisions of AB 617, AB 197, AB 1071, SB 535, AB 1550, and other laws to better ensure that environmental justice communities see additional benefits from our clean air and climate policies.

### On page ES1 CARB says

- Improve the health of all Californians by reducing air and water pollution and making it easier to bike and walk;

### And on page 64 CARB says on water and waste:

- Land conservation results in healthier watersheds by reducing polluted runoff, allowing groundwater recharge, and maintaining properly functioning ecosystems.
- Resilient natural and working lands provide habitat for species and functions to store water, recharge groundwater, naturally purify water, and moderate flooding. Forests are also a source of compost and other soil amendments.
- Conservation and land protections help reduce VMT and increase stable carbon pools in soils and above-ground biomass

- Compost for carbon sequestration, erosion control in fire-ravaged lands, water conservation, and healthy soils
- Replacing virgin materials with recycled materials associated with goods production; enhanced producer responsibility reduces energy impacts of consumption
- Efficient packaging materials reduces energy consumption and transportation fuel use

4. San Carlos should explain how dangers to pedestrians and bicyclists can be reduced such that the mode share increases to offset green house gases from transportation. How will the goals of the San Carlos Downtown Specific Plan overcome past problems with multi mobility goals especially increasing share?

If the goal is vision zero there should be no car parking allowed. The goal of increasing bike and pedestrian traffic has been a failure since the 70s gas crisis. Each has stayed stubbornly at 1% off trips on average over the decades in CA except for some cities like SF and Berkeley where separate infrastructure and parking prices have changed travel behavior.

NACTO covers the pro and cons of separated bikeways-  
[https://nacto.org/wp-content/uploads/2016/05/2-4\\_FHWA-Separated-Bike-Lane-Guide-ch-5\\_2014.pdf](https://nacto.org/wp-content/uploads/2016/05/2-4_FHWA-Separated-Bike-Lane-Guide-ch-5_2014.pdf)

During the pandemic a better model for increasing mode share was Oakland's Slow Streets

<https://nacto.org/publication/streets-for-pandemic-response-recovery/emerging-street-strategies/slow-streets/>

### **CARB says**

- Improve the health of all Californians by reducing air and water pollution and making it easier to bike and walk. Page ES-1
- CDPH estimated that 2,100 premature deaths annually would be avoided if Californians met the Management Plan's 2020 targets were met by Californians compared to 2010 travel patterns. Page 49.

Regards,

Gladwyn d'Souza

Chair, San Carlos Belmont Sierra Club Group.

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**From:** [Lisa Porras](#)  
**To:** [lisa brownfield](#); [Barbara Beard](#); [Mike Campbell](#)  
**Subject:** FW: SC zoning considerations  
**Date:** Tuesday, February 1, 2022 2:44:36 PM

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-----Original Message-----

From: Ralph Althouse  
Sent: Monday, January 31, 2022 6:49 PM  
To: Lisa Porras <[LPorras@cityofsancarlos.org](mailto:LPorras@cityofsancarlos.org)>  
Subject: SC zoning considerations

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Hi,

I own a single family house currently rented out long term. I am writing to add my voice for a measured approach to implementing new state mandated housing legislation. I currently live in Seattle Washington and have seen first hand the effect multi family development has had on my neighborhood. The current units under development have increased units but have not demonstrably lowered prices. In fact housing prices continue to increase. Additionally new housing, regardless of the number of units, do not require off street parking, which has substantially increased street congestion.

I would favor

1. Limiting multi family development to 10 to 20% of available lots. This will retain the family based structure for which San Carlos is noted. It will further limit unlimited growth which will rapidly out pace the social structure such as schools, parks, municipal services, etc.
2. Limiting to two subplot buildings with integral ADU. This would limit to 4 units on the property.
3. Limiting vertical height maximums.
4. Requiring at least some off street parking.
5. Limiting rentals to long term, avoiding AirBnb type rental units.
6. Careful management of open spaces, trees, parks etc.

Our city has an opportunity to direct this growth to help development proceed sensibly.

Thank you.

Ralph Althouse

Sent from my iPhone  
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aH3Lv1P53KW9&r\\_address=orras%40cityofsancarlos.org&report=](#)

**From:** [Lisa Porras](#)  
**To:** [Barbara Beard](#); [Mike Campbell](#)  
**Cc:** [lisa brownfield](#)  
**Subject:** San Carlos FW: San Carlos General Plan Update Comments  
**Date:** Monday, January 31, 2022 1:12:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Comment on NOP

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**From:** Sean Gibson  
**Sent:** Monday, January 31, 2022 12:58 PM  
**To:** Lisa Porras <LPorras@cityofsancarlos.org>  
**Subject:** San Carlos General Plan Update Comments

[**NOTICE:** This message originated outside of City of San Carlos -- **DO NOT CLICK** on **links** or open **attachments** unless you are sure the content is safe.]

Lisa,

Thank you for your efforts on the general plan housing element update triggered by the new RHNA goals.

After reviewing the maps in the NOP, I had a comment on upzoning consideration for 782 Elm St, 549 Prospect St and 575 Prospect St, as well as clarification on upzoning for the site on Vista del Grande in RS-6.

It is difficult to tell from the maps if 782 Elm St, 549 Prospect St and 575 Prospect St are being considered for upzoning to RM-100. If they are not (and can be), this is a request to include these sites in the upzoning plans. Note the entitlements for all three have expired.

And there is a site on Vista del Grande in RS-6 that is not included in the potential zoning change map but is included in the tentative 6th cycle housing sites inventory. And the staff report did not include RS-6 as a zoning type included in the possible zoning density increases. Please clarify if this site is included or not and, if so, what zoning is being considered, as well as what the rationale was for choosing this specific site vs. adjacent sites with the same zoning.

See below for the reference maps.

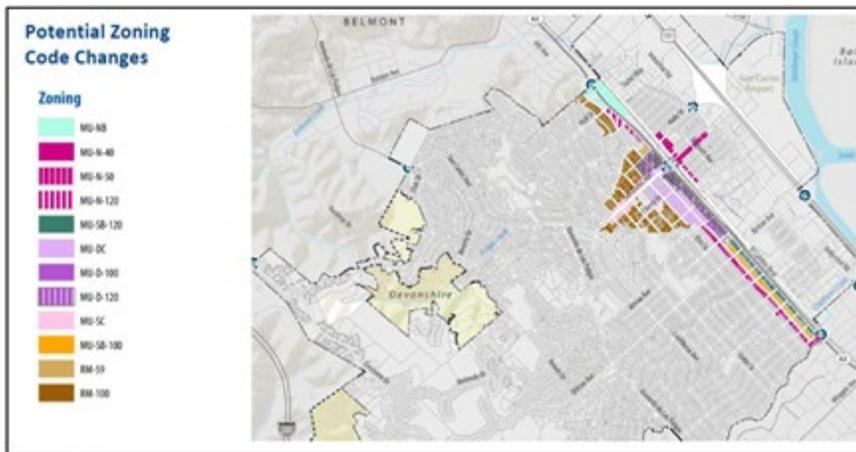
Regards,

**Sean Gibson**

Head of Communications and Partnerships



Figure 6 - Potential Zoning Code Changes appears to show the Elm and Prospect sites are within the RM-59 to RM-100 zoning change.



\*Note: MU-NB is proposed at 120 dwelling units per acre as described in Attachment 1 ("NOP").

Figure 7- San Carlos Tentative 6th Cycle Housing Sites doesn't seem to include all of these sites on Prospect and Elm. And it does include one parcel in RS-6 on Vista del Grande (lower left)



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