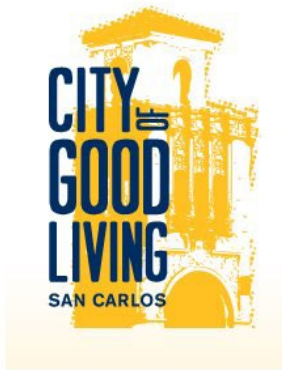


City of San Carlos Focused General Plan Update Final Environmental Impact Report SCH# 2021120442



Lead Agency:
City of San Carlos
Community Development Department
Planning Division
600 Elm Street
San Carlos, CA 94070
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December 2022

Prepared with the assistance of MIG, Inc.

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Appendix A: Mitigation Monitoring and Reporting Program

CHAPTER 1. INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for the City of San Carlos (City, or Lead Agency) Focused General Plan Update. The EIR is prepared as an informational document for action by the City for the proposed project.

Per the California Environmental Quality Act (CEQA) Guidelines Section 15132, the Final EIR shall consist of:

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

In accordance with CEQA Guidelines Section §15132, this document together with the October 2022 Draft EIR constitutes the Final EIR for the Focused General Plan Update project.

1.1 ENVIRONMENTAL REVIEW PROCESS

1.1.1 Public Scoping of the Draft EIR

Public outreach for the Draft EIR included public noticing, issuance of a Notice of Preparation (NOP) for an Environmental Impact Report, and conducting a public scoping meeting for the EIR. The NOP was prepared and circulated to local, state, and federal agencies and made available to the public on December 17, 2021 (SCH# 2021120442). The NOP was made available to the public on the City's project website (www.SanCarlos2040.org) and through email sign-up lists created by City staff that were used to receive public comments on the NOP as well as on the overall focused General Plan Update project. Circulation of the NOP consisted of its filing with the San Mateo County Clerk's Office and publishing in the Examiner-Inquirer-Bulletin. Online and print editions of the NOP were published on December 22, 2021. The City provided for a 45-day public review period of the NOP that ended on January 31, 2022. Written comments in response to the NOP were received from two agencies / organizations and seven interested individuals.

The City held a virtual (online) public scoping meeting on January 12, 2022 before the San Carlos Planning Commission. Oral comments heard at this scoping meeting generally consisted of concerns regarding proposed zoning changes (densities and building height limits), the Housing Element and RHNA numbers, airport flooding (levees), EV charging stations, school capacities, San Mateo County Sheriff contract and patrols, public transit destinations, hydrology/hazards (sea level rise and rising groundwater levels, transport of hazardous chemicals in groundwater), and affordable housing. Other issues raised in comments received following the NOP scoping meeting

Chapter 1. Introduction

included cultural resources/tribal cultural resources, land use, transportation/traffic (vehicle miles traveled [VMT]), Transportation Demand Management (TDM) Programs, proposed pedestrian, bicycle and transit network improvements, improvements to the State Transportation Network, Caltrain ridership, walkability and bicycle safety. Comments received during the public scoping meeting and subsequent correspondence were taken into consideration during the preparation of the Draft EIR.

1.1.2 Public Review of the Draft EIR

The Draft EIR was posted on the project website (www.SanCarlos2040.org) and hardcopies were made available for viewing at City Hall, the City Library and the Adult Community Center. The DEIR was circulated for a 45-day public review beginning October 14, 2022 and ending on November 28, 2022. The Notice of Availability was released to public agencies and the general public, printed in the newspaper, posted with the County Clerk's office and filed at the State Clearinghouse for State Agency review in December 2021.

A total of 14 comment letters and emails were received by the City by the November 28, 2022 deadline. These included one comment letter from a State Agency (California Office of Emergency Services) and 13 from individual members of the public.

1.2 CHANGES TO THE DRAFT EIR

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines Section 15088.5, when significant new information is added to the EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This Final EIR includes the following modifications to the Draft EIR:

- Additional minor General Plan text changes.
- Text changes to provide clarity to the analysis, make minor text corrections, or fix grammatical or typographic errors.
- Text changes to reflect the comments received on the Draft EIR.
- Minor changes to zoning (Zoning Amendments) for clarification purposes.

These revisions do not constitute considerably different changes in the project description, environmental setting, conclusions of the environmental analysis, or in the mitigation requirements incorporated into the project or otherwise provide significant new information that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

1.3 FINAL EIR ORGANIZATION

The Final EIR for the City of San Carlos Focused General Plan Update project is organized as follows:

- Chapter 1 Introduction.** This chapter explains the contents of a Final EIR and the environmental review process for the Focused General Plan Update project.
- Chapter 2 Additional Information.** This chapter describes and summarizes additional information related to the project. The Chapter is divided into additional information provided by City staff and additional or clarifying information provided as a result of comments received during the public review process.
- Chapter 3 Public Comment on Draft EIR and City Responses to Comment.** This chapter contains copies of the comment letters received on the Draft EIR during the public review period. The comment letters have been individually numbered. A list of those who commented is provided at the front of the chapter. Each comment letter is presented and a written response is provided to each comment raising a significant environmental issue submitted on the Draft EIR.
- Chapter 4 Errata and Revisions.** This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR. The changes correct inaccuracies and clarify the analysis in the EIR.

CHAPTER 2. ADDITIONAL INFORMATION

2.1 REVISIONS TO THE DRAFT EIR

The following are edits to the Land Use Element, Circulation and Scenic Highway Element, and Environmental Management Element policies or actions that have been initiated by City staff since the Draft EIR was published. The edits are to clarify existing language within the General Plan related to the Focused General Plan Update and minor edits to specifically include reference to the San Carlos Bicycle and Pedestrian Master Plan approved by the City Council in 2020.

One new action, *Action ESPS-5.6* is being added in response to public comments received during circulation of the Draft EIR. See Chapter 3 for the specific comments and City responses.

2.1.1 General Plan Revisions

Land Use Element

The Draft EIR presented edits to the Land Use Element in ~~strikeout~~ and underline text. New edits to the Land Use Element of the proposed Focused General Plan Update (since the publication of the Draft EIR) in this Final EIR are shown in red, with newly added text shown in red underline and newly deleted text as shown in ~~red-strikeout~~.

- *Action LU-1.8:* Amend the Zoning Ordinance to address the new multiple-family and mixed-use designations as part of the 2023 Focused General Plan Update.
- *Policy LU-9.10:* On school and formerly school sites, allow low and moderate income rental housing units made available to local educational employees, local public employees, and then the general public at densities and development standards in accordance with AB2295, 2022.~~In the event of closure of a school, the primary planned use of these sites re-mains for school and associated recreation purposes, or housing. The school site should be considered for acquisition by the City.~~
- *Policy LU-9.14:* Legally nonconforming multi-family residential structures located within multi-family residential zoning districts may be replaced, restored, or rebuilt,~~or repaired~~ and used consistent with the Zoning Ordinance in effect at ~~the time the structure was originally constructed only upon issuance of a conditional use permit approved by the Planning Commission~~ the time of the replacement, restoring, or rebuilding.
- *Policy LU-9.21:* Consider allowing public school districts and local private schools to provide affordable housing units on school or school-related sites concurrent with continued school operations.
- *Action LU-9.3:* Update development standards to allow for single family attached, multiple family detached, and/or multiple family attached affordable housing units to be constructed and maintained concurrent with school operations.

Environmental Safety and Public Services Element

Since the text of the Environmental Safety and Public Services Element was all new in the Draft EIR, the edits proposed by City staff since the publication of the Draft EIR are shown in ~~strikeout~~ for deleted text and underline text for new text. As noted above, Action ESPS-5.6 is a new action presented in response to public comment received on the Draft EIR.

Action ESPS 3.7: Adopt a formal written policy ~~Periodically re-evaluate the City's policy~~ regarding the City's policy allowing rebuilding in the VHFHSZ. Periodically, re-evaluate the policy to assure consistency with State law and local preferences. ~~allowing rebuilding in the VHFHSZ. If the policy is unwritten, adopt a formal written policy.~~

Action ESPS-5.6: Prepare regulations that address biosafety levels (BSL) for new life science, biotechnology, or other scientific developments to ensure a healthy and safe San Carlos community.

Circulation and Scenic Highway Element

Policy 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.

Environmental Management Element

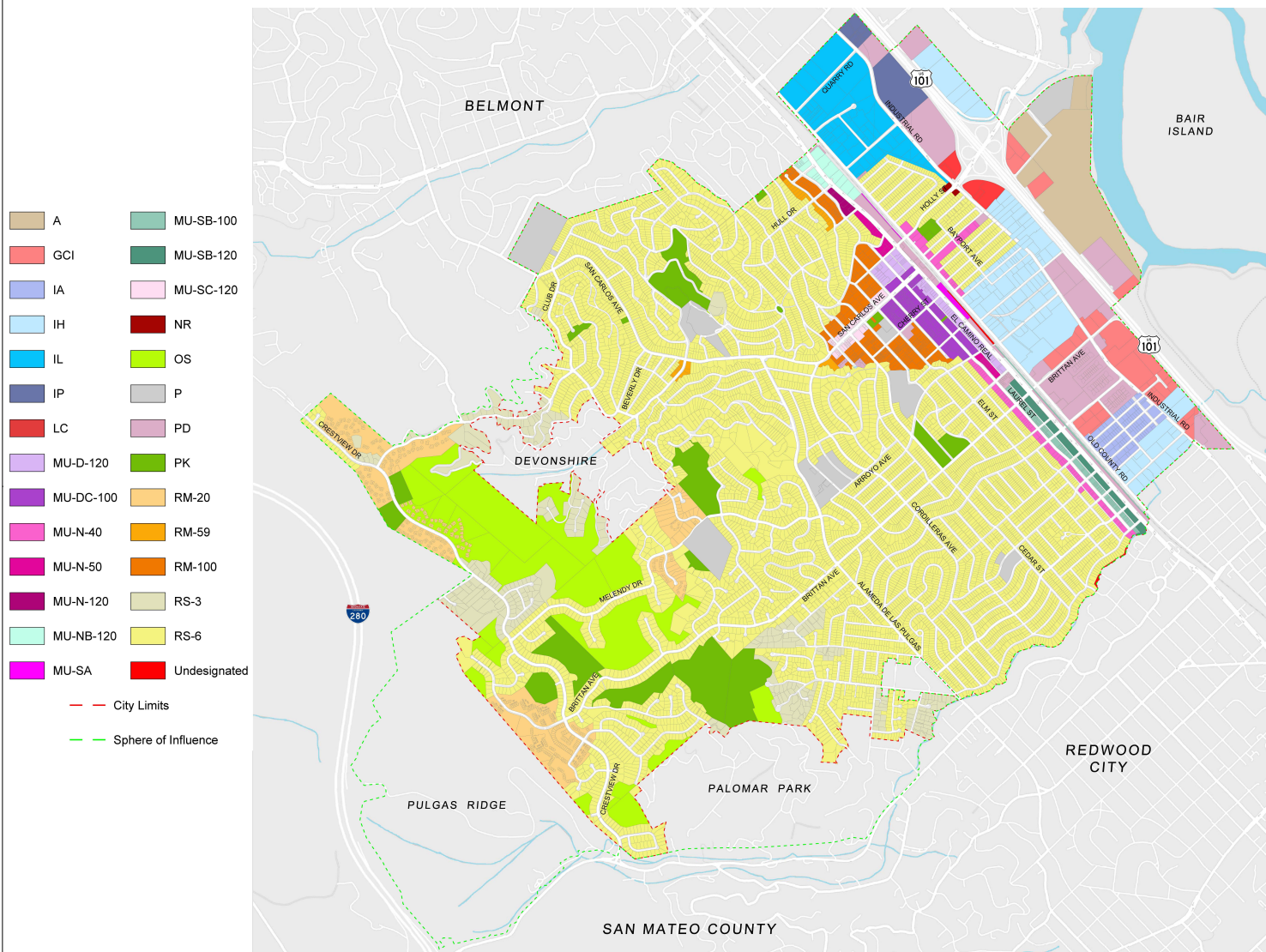
Policy EM-11.4: Provide an integrated network of bicycle and pedestrian thoroughfares that connects jobs and housing to other city destinations, as recommended in the City's Bicycle and Pedestrian Master Plan.

2.1.2 Proposed General Plan Land Use Map

The proposed General Plan Land Use Map has been revised in response to public comment and minor corrections that have come to light since the proposed General Plan Land Use map was presented in the Draft EIR. The revised Figure 3-7 Proposed General Plan Land Use map follows here:

2.1.3 Proposed Zoning Map

The proposed Zoning Map has been revised in response to public comment and minor corrections that have come to light since the proposed Zoning Map was presented in the Draft EIR. The revised Figure 3-8 Proposed Zoning Map follows here:



Source: CALCAD December 2022

Figure 3-8 Proposed Zoning Map
San Carlos Housing and Safety Elements

CHAPTER 3. PUBLIC COMMENT ON THE DRAFT EIR AND CITY RESPONSES TO COMMENT

This chapter contains copies of the letters and emails, collectively called “comment letters” received on the Draft EIR during the public review period. The comment letters have been individually numbered and will appear on the following pages in the order presented below. Comments were received from the following agencies and individuals:

State Agencies:

- Comment Letter 1: California Office of Emergency Services (CAL OES)

Local Agencies:

- none

Organization or Individual:

- Comment Letter 2 - Edward Collins
- Comment Letter 3 - Bryan Shields – Nor Cal Carpenters Union
- Comment Letter 4a - Sara Timby
- Comment Letter 4b - Sara Timby
- Comment Letter 5 - Bryan Silverthorn
- Comment Letter 6 - Paul Magginetti
- Comment Letter 7 - Alison Fox
- Comment Letter 8 - Ryan Kauffman
- Comment Letter 9 - Gary and Debbie Baldocchi
- Comment Letter 10 - Todd Trekell, Hunter Properties
- Comment Letter 11 - Don Cox
- Comment Letter 12 - Sean and Jen Peters
- Comment Letter 13 - (No Name Provided)
- Comment Letter 14 – Ed Evans, Carpenters Union Local 217 San Mateo County
- Comment Letter 15 – Robert Tomkinson

A copy of each comment letter, followed by the City’s written responses to those comments, follow.

The following statement, which appears at the bottom of the comment letters, is strictly a reference to the City’s web address that contains all of the comment letters received on the Draft EIR and does not require a response:

See all comments.

https://www.sancarlos2040.org/mail_forms/listing.

Comment Letter 1

From: CalOES Mitigation Planning <mitigationplanning@caloes.ca.gov>

Sent: Tuesday, November 22, 2022 8:26 AM

To: Lisa Porras <LPorras@cityofsancarlos.org>

Cc: Peri, Jared@CalOES <Jared.Peri@CalOES.ca.gov>; LaMar-Haas, Victoria@CalOES <Victoria.LaMar-Haas@CalOES.ca.gov>; Boemecke, Wendy@CalOES <Wendy.Boemecke@CalOES.ca.gov>

Subject: Safety Element Update Comments- City of San Carlos

Good Morning,

Cal OES has reviewed the Safety Element Update to the General Plan. Our office has a couple of comments.

The Safety Element addresses the following hazards: Climate Change, Sea Level Rise, Flooding, Geologic, Wildfires

When reviewing your FEMA adopted Local Hazard Mitigation Plan we find that the identified medium and high risk hazards are as follows: Earthquake, Flooding, Severe Weather, Wildfire, Landslide/Mass Movements, Sea Level Rise/ Climate Change

Below Is the link to the California Office of Planning and Research Safety Element Guidelines

[General Plan Guidelines, Chapter 4: Required Elements \(ca.gov\)](#)

Required Contents the safety element must, consistent with Government Code Section 65302(g), provide for the protection of the community from any unreasonable risks associated with the effects of:

- Seismically induced surface rupture, ground shaking, ground failure
- Tsunami, seiche, and dam failure
- Slope instability leading to mudslides and landslides
- Subsidence
- Liquefaction
- Other seismic hazards identified pursuant to Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body
- Flooding
- Wildland and urban fires
- Climate change

Thank you for the opportunity to review and comment.

Jared Peri, Senior Emergency Services Coordinator
Hazard Mitigation Planning Division
California Governor's Office of Emergency Services



Mobile: (916) 524-3470

Email: Jared.Peri@caloes.ca.gov

Program Email: mitigationplanning@caloes.ca.gov

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 1 - California Office of Emergency Services (CAL OES):

These are comments on the Safety Element update to the General Plan and do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 2

From: info@sancarlos2040.org
Date: November 22, 2022 at 6:02:07 PM PST
To: info@sancarlos2040.org
Subject: Comment from Townsquare
Reply-To: info@sancarlos2040.org
Comment Submitted by:

Name: Edward Collins
Organization: 4 decade long citizen
Email: edmnc@hotmail.com

Comment:

To justify that comment one need only look at the council vote for the monstrous lab last week.. it needed all sorts of exceptions to multiple different plans, agreements, and only 1 resident in the area was for it with reservations, nonetheless the council rubber stamped it cartes blanche despite promises they made in the general plan or to the citizens in the area. So why have it? They don't care about the poor or seniors or vets, my father and mother are all three yet the city has never done anything but punish and take and lie. They can't even enforce two no parking spots put in for the safety of school children, let alone enforce an absurd 15 mph speed limit, or slow down traffic enough so it doesn't careen off a badly maintained major road into residents private property so they big promises in this plan appear as pure fantasy or farce.

This plan is out of touch with reality, and needs to be completely redone with truth and honesty. Throw it away, and start over, but this time leave the doublespeak in fictional literature .

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 2 - Edward Collins:

These comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 3

From: info@sancarlos2040.org

Date: November 22, 2022 at 3:40:27 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Bryan Shields

Organization: Nor Cal Carpenters Union

Email: bshields@nccrc.org

Comment:

Hello,

Labor standards are an important and a lot of times missing aspect of these plans. It is important to not only allocate units, apn's and height but also how the workers would be treated on these projects. Without Labor Standards what we see out there in the construction workforce is wage theft and zero safety regulations.

With the implication of simple Labor Standards, such as Apprenticeship, Prevailing wage and Healthcare you as the city are telling the Developers and Contractors to value your citizens as they build on your land.

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 3 - Bryan Shields – Nor Cal Carpenters Union:

These comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 4a

From: info@sancarlos2040.org

Date: November 27, 2022 at 12:59:32 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Sara Timby

Organization: None Given

Email: stimby@stanford.edu

Comment:

Please consider adding protection for the 52 structures listed in the Historical Resource Inventory, city of San Carlos, CA, 1991. The report was prepared by the San Mateo County Historical Resource Advisory Board under contract to the City of San Carlos. Kent L. Seaver served as primary author. Elizabeth Rowland served as the city project supervisor.

Also, it would be good to have a specific goal for residence carbon reduction by 2040. Several cities are doing this - I can provide more info if interested.

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Response to Comment Letter 4a - Sara Timby:

The Draft EIR lists the following relevant cultural resource Goal, Policies and Action from the General Plan's Land Use Element in Chapter 4.4 Cultural Resources and Tribal Cultural Resources.

Goal LU-12: Protect San Carlos' historic and cultural resources to maintain and enhance a unique sense of place.

Policy LU-12.1: Evaluate historical and cultural resources early in the development review process through consultation with interested parties.

Policy LU-12.2: Foster the preservation, restoration, and compatible reuse of architecturally and/or historically significant structures and sites.

Policy LU-12.3: Ensures that modifications to identified historic resources are consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties

Policy LU-12.4: Encourage continued use and adaptive reuse of designated historic resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction, and restoration.

Policy LU-12.5: Treat with respect and dignity any human remains discovered during implementation of public and private projects within the city and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws.

Policy LU-12.8: Retain the exterior architectural character and setting of the Historical San Carlos Depot.

Action LU-12.1: Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural and historical resources.

Section 4.4.4 of the Draft EIR provides an analysis of potential impacts to historical resources from new development, and concludes that compliance with these General Plan policies and actions, and compliance with CEQA requirements for evaluating historic resources would ensure that potential impacts to historical resources are minimized and that this policy framework would serve to prevent impacts to historical resources from occurring. Policies LU-12.1, LU-12.2 and LU-12.3 in particular would apply to the protection of resources that are contained in the City's Historical Resource Inventory, as the Inventory would serve as the primary reference source for identifying and evaluating historical resources in the City. It is also worth noting that the Draft EIR is a program-level document, and that individual future development projects would require separate CEQA review to determine whether they would warrant additional review and documentation.

The commenter states that it would be good to have a specific goal for residence carbon reduction by 2040. Comment noted. This comment is not on the adequacy of the Draft EIR, and does not raise any significant environmental issues. No further response is required.

Comment Letter 4b

From: Sara Timby <stimby@stanford.edu>

Sent: Sunday, November 27, 2022 1:47 PM

To: Lisa Porras <LPorras@cityofsancarlos.org>

Subject: Fwd: Program seeks to curb residents' carbon footprint - The Mercury News

More info on the residential carbon curb program (for the EIR).

https://edition.pagesuite.com/popovers/dynamic_article_popover.aspx?guid=83d9eb59-ff26-470f-a218-b362e68fe01f&appcode=SAN252&eguid=96627b68-b4d2-4af5-881a-3e3409cab587&pnum=41#

Link:

SANTA CRUZ

Program seeks to curb residents' carbon footprint

By Aric Sleeper

Santa Cruz Sentinel

SANTA CRUZ >> To try to curb carbon emissions in Santa Cruz by 40% from 1990 levels by 2030 and reach the city's aspirational target of carbon neutrality by 2035, the city has launched its Resilient Santa Cruz platform.

The online dashboard is designed to help residents track the actions they take that contribute to their carbon emissions and give helpful tips on how to reduce their footprint.

"Folks need the ability to understand what their carbon footprint is, where their major areas for high impact are and they need links to easy-to-understand information — rebates and credits that are available — and all in a one-stop shop," said Tiffany Wise-West, sustainability and climate action manager. "That's what Resilient Santa Cruz really is."

The online platform is tied to the city's 2030 Climate Action Plan, which was adopted in September. Through the platform, users commit to emissions reduction actions and then receive feedback about the actions, such as turning the heat down or using LEDs.

To make the program a reality, Wise-West teamed up with Ecology Action, Central Coast Community Energy and other regional organizations to create Resilient Santa Cruz, Resilient Santa Cruz County and Resilient Central Coast.

"This really is a six-county activation platform," Wise-West said. "We're achieving some efficiencies in scale here because this is not something that the city could launch on its own due to the cost of maintaining such a platform and also the high degree of communication that's needed with our community to really optimize the use of the platform."

The city hopes that 1,000 households register with the platform by April 23, which is Earth Day. As an incentive, 100 prizes are being given away to those who register, including gift cards, food waste pails, bicycle equipment and the grand prizes of a youth and adult bike. To qualify to win one of the prizes, residents need to register and create a profile on the platform.

“Since we launched ... we have about 94 households registered,” Wise-West said. “So we’re at 10% of our target already.”

After experimenting with various forms of outreach in the past, such as fact sheets, webinars and community meetings, Wise-West said she feels that the online platform will be a more effective way to connect with the community about these issues.

“This gives us a better mechanism to reach folks,” she said. “We recognize that people have their own schedules and they prioritize their time to go get groceries or work a second job. This enables people to utilize the platform on their own time, which is really critical in this day and age.”

Another strategy the platform uses to better engage residents about carbon emissions and actions they can take to curb them, is to promote the creation of teams and challenges, which is already being implemented within the departments of city government.

To register, go to resilientsantacruzcounty.org/santacruz.

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 4b - Sara Timby:

Comment noted. This comment does not address the adequacy of the Draft EIR, and does not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 5

From: info@sancarlos2040.org

Date: November 27, 2022 at 4:49:40 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Bryan Silverthorn

Organization: None Given

Email: bsilverthorn@gmail.com

Comment:

As a resident of San Carlos, I want to live in a healthy community, a community that grows to include new people and new businesses, and that adapts to broader changes across our region and world. As a member of the general public, I lack the expertise to comment on technical or legal details of this report. However, I fully support the broad goals of the general plan update as I understand them, most importantly:

- Encouraging more housing development
- Enabling efficient high-density development
- Supporting housing affordability at all income levels

As this report makes clear in its comparison vs "Identified Alternatives", the city's existing plan is failing to achieve these goals. Maintaining our status quo would have more significant negative impact than the changes under consideration.

Although I believe that San Carlos should be more ambitious in its development plan, especially with higher-quality transit, pedestrian, and bike infrastructure, the updated plan is an improvement over the status quo.

My impression is that this report accurately characterizes the environmental tradeoffs relevant to the updated plan. I appreciate the hard work of city staff to move this process forward.

Regards,

Bryan Silverthorn
San Carlos, CA

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 5 - Bryan Silverton:

These are comments on the merits of the proposed Focused General Plan Update project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 6

From: info@sancarlos2040.org

Date: November 27, 2022 at 12:10:19 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Paul Magginetti

Organization: None Given

Email: pdmaggine@hotmail.com

Comment:

Please see my comments below for the Draft EIR for the new Housing Element of the General Plan:

Staff is proposing doubling the density to MU-N-40 parcels along East San Carlos Ave., creating a situation where single-family residences bear all of the impacts of a high-density housing development, lowering their property values, while the six adjacent property owners stand to profit greatly. How is this type of spot zooming even legal? The density bonuses and the new law prohibiting minimum parking requirements for new housing, commercial and other developments located near public transit risks development adjacent to single family homes that are wildly out of character with the community. What is the legal definition of “transit”? What is “a major transit stop as defined in Section 21155 of the Public Resources Code.”? Does it include all rail and bus stops? The Planning Commission just recently arbitrarily approved a 40-foot variance to a zoned 50-foot height limit with no rational justification. How can we believe the proposed housing element won’t just be ignored by future Planning Commissions and City Council? These proposed zoning changes have so many exceptions and state mandates that the community is very concerned that the worst-case scenario will be proposed by a developer and the city either must approve a development or will arbitrarily approve a “density bonus” project that tears our community apart.

Why are zoning changes for the identified RS-3 and RS-6 properties not being proposed even though they are SB-9 eligible (Figure 4.5-2 and 4.5-3, pages 144 and 145)? Are developments on RS-3 and RS-6 properties eligible for a Density Bonus and no minimum requirement for parking per state law? Why is staff only proposing higher density in parts of the city that are already described in the proposed 2023 Housing Element for the General Plan as, more “non-white population” (page139), least “positive environmental outcome” (page 172), most “socially vulnerable” (page 174), and more “overcrowded” (Page 189)? The City Council meeting started out with a presentation by Community Foundation of San Carlos that included a “Social Justice & Equity Committee Update”. I would like to see more of that compassion within the San Carlos city limits.

What proportion of new housing is proposed to be owner occupied? Owner occupation promotes financial independence and more stable neighborhoods.

Why is the underutilized airport property not being considered for changes under the general plan? This public property benefits a tiny minority of special interests for the most unsustainable use possible. This represents acres and acres of land that could be better used for housing in an area already central to

multiple transportation opportunities (and adjacent to the SamTrans South Base Maintenance & Bus Yard). This property alone could meet current and future housing needs for the city and the county for decades to come. If we are serious about affordable housing this should be on the table. We built housing on a public railroad right of way; this is no different.

Why has staff taken a maximalist approach to increased density in East San Carlos, disregarding community feedback they received in multiple workshops? What assurance do we have that the housing element of the general plan will even be followed? These density bonuses and a lack of minimum parking requirement are a real wild card and combined with the proposed Housing Element changes creates new zoning requirements that put the community at risk.

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Response to Comment Letter 6 - Paul Magginetti:

These are comments on the merits of the proposed Focused General Plan Update project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 7

From: AF <asf56789@yahoo.com>

Sent: Saturday, November 26, 2022 6:44 AM

To: Lisa Porras <LPorras@cityofsancarlos.org>

Subject: Public Comment on San Carlos' Public Draft EIR

Hello Ms. Porras,

I am writing to submit a comment on the **Public Draft Environmental Impact Report (EIR)** for the City's Focused General Plan Update for the Housing, Environmental Safety, Land Use, Circulation, Environmental Management, and Noise Elements, and associated amendments to the San Carlos Zoning Ordinance.

I have read in the document that efforts should be made to mitigate negative impacts on protected animal species and wetlands, but I have not found language in the document that protects or mitigates against a change in urban forest density or coverage. In the document, it is mentioned that where trees are removed for real estate development, efforts will be made to protect animal and special land/water needs. However, what seems to be missing is that for every tree removed for development, the same number of trees should be planted in San Carlos to make up for any loss in tree canopy coverage.

Please let me know if I have misinterpreted the document. Any reduction in tree levels in our City is harmful to the health and well-being of our population and environment. Preservation of trees is important, while growth in urban tree planting is desired, to better mitigate against air pollution, improve water quality, and reduce energy, as Menlo Park, East Palo Alto, Palo Alto and Mountain View have done as part of their urban forest plans.

Thank you,
Alison Fox
San Carlos resident

Response to Comment Letter 7 - Alison Fox:

Protection of the urban forest is specifically addressed in the discussion under Impact BIO-5, in Chapter 4.3 Biological Resources of the Draft EIR. The Draft EIR states that the San Carlos General Plan contains goals and policies protecting natural habitat and other biological resources, streams and riparian habitat, and the urban forest. It further states that all housing projects would have to comply with the City of San Carlos Protected Tree Ordinance (Municipal Code Section 18.18), which requires a permit for removal of protected trees and has standards for required replacement trees and tree protection plans for retained protected trees. Chapter 4.3.2 Regulatory Setting lists the General Plan Goals and Policies that would apply to the project, including the following:

Goal EM-3: Enhance the Urban Forest.

Policy EM-3.1: Maintain and expand the urban canopy with special emphasis on protection of heritage trees.

Policy EM-3.2: Review and amend the Zoning Ordinance as needed to identify barriers to the effective enhancement of the urban forest and the protection of heritage trees.

Policy EM-3.3: Assist community groups with tree planning efforts.

Therefore, the Draft EIR addresses urban forest concerns and no additional text is required.

Comment Letter 8

From: info@sancarlos2040.org

Date: November 28, 2022 at 6:53:49 AM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Ryan Kauffman

Organization: Resident

Email: ryankauffman@gmail.com

Comment:

Circulation and access for Laurel and surrounding areas should prioritize biking and walking to mitigate vehicle congestion and encourage healthier transportation options for those who can participate. Creating a downtown that is lively and convenient for the community to gather, dine, and interact is critical to keeping the city of good living, the city of good living. Please consider expanding access for bikes and pedestrians to activate more dining and communal spaces on Laurel

Thank you,

Ryan

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Response to Comment Letter 8 - Ryan Kauffman:

These comments are on the merits of the proposed Focused General Plan Update project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 9

November 28, 2022

City of San Carlos
Members of the City Council
600 Elm Street
San Carlos, CA 94070

Subject: Proposed Draft EIR for General Plan, Housing Element and Environmental Safety Element—Public Comments (Request addition of new element that includes specific zoning ordinances and guidelines for Life Science and BioSafety labs)

Dear Planner Lisa Porras, Mayor McDowell and Members of the City Council,

We submit the following public comments for your review and consideration before you approve the Draft EIR for the San Carlos General Plan specifically, **the Environmental Safety Element**. [Click here to view the Public Draft Environmental Impact Report. Click here to view the Appendices.](#)

It is our perception that the provisions in the General Plan's *Housing Element* and the *Environmental Safety Element* do not adequately address the significant environmental and public safety impacts that may result from millions of square feet of developments that have been approved, are pending or planned that may house Biosafety Labs (BSL) that use hazardous materials in their operations and generate hazardous waste, biological waste, rDNA, radioactive or other organisms or biological materials known to cause life-threatening illness and death in humans, animals and wildlife.

Many other jurisdictions and cities have a significantly greater level of BSL oversight incorporated into their general plans, *Environmental Safety Elements*, and zoning. See 2022 City Council analysis from [Kansas](#) and [Natick](#). See also: [Massachusetts Environmental Compliance for Labs labfs15.pdf](#)

Many also have Biosafety committees whose members have specialized education, training and experience that qualify them to recommend necessary zoning changes, evaluate, monitor and oversee BSL uses. The City does not have a Biosafety committee and, to our knowledge, does not employ staff or consultants who have the requisite specialized education and experience to effectively participate in these important public safety recommendations.

In the interest of public and environmental safety, the San Carlos General Plan should include a specific *Biosafety Element* which includes ordinances and guidelines for Biosafety labs, level 1, 2, 3 or 4. The current General Plan and *Environmental Safety Element* do not contain any reference to BSL labs and there are no specific zoning or guidelines regulating their use.

We infer from the non-specific and generalized language in the General Plan and new *Environmental Safety Element* that the City applies zoning standards developed years

ago for industrial uses in East San Carlos. We perceive the omission of updated BSL ordinances and guidelines in the *Environmental Safety Element* to be a calculated strategy to afford these developments lax or minimal oversight in both siting, operations and monitoring. We are informed and believe that Alexandria and other completed Life Science developments currently operating in San Carlos house BSL level 1 and 2 labs that were not disclosed to the public.

We spoke with the representative from Alexandria in 2020 and were told that she could not disclose that information due to tenant confidentiality. The Public's right to know about potential significant threats to environmental and public safety outweigh tenants' rights to confidentiality. The City is morally and possibly legally obligated to be transparent in this regard.

After all of the Life Science developments are built out (there are currently at least 10 in the pipeline), San Carlos may have more square feet of BSLs per capita and per square mile than any other city in California. Therefore, we respectfully request that San Carlos follow the example of other cities in the bay area and nationwide and adopt specific guidelines and ordinances that will regulate developments that house BSLs.

We reviewed a number of local cities guidelines. We found one on the east coast particularly informative. It is a 2018 letter to the Watertown, MA city council regarding rDNA and BSL safety issues considered by the [Lexington, MA city council](#).

We note that the General Plan reads that San Carlos covers 8 square miles: *The City of San Carlos encompasses approximately eight square miles, nearly all of which are developed with urban land uses.* (See Section 2.) Public sources indicate that San Carlos covers 5.413 miles. Please clarify the correct square miles so that the City can calculate the square feet of Life Science developments per square mile and per capita. We'd appreciate this clarification at the upcoming City Council meeting tonight, Monday, November 28, 2022.

Based on our research and review of other cities guidelines, we ask the staff and City Council to consider adopting a new *Biosafety Element*, or at a minimum, add BSL ordinances and guidelines to the proposed *Environmental Safety Element* that include the following provisions:

- (1) Prohibit BSL level 3 and 4 labs within San Carlos city limits due to unique geological, ecological and environmental limitations, FEMA flood zones, high-risk earthquake zones, area at high risk of liquefaction, areas with shallow ground water, Hiller airport and flight school, Belmont and Pulgas creeks, riparian corridors, and sensitive habitats and proximity to residential housing, restaurants, hotels, medical and dental offices, senior and childcare facilities.
- (2) Establish setbacks at least 300 feet away from residential homes, hotels, senior facilities, hospitals, medical or dental offices, restaurants and child care facilities.

- (3) Prohibit all BSLs in FEMA flood zones that have experienced site or street flooding in the past 10 years, such as areas near Industrial Road adjacent to Belmont or Pulgas creek.
- (4) Require minimum 25-50 feet setbacks from creeks and riparian corridors.
- (5) Establish specific guidelines related to the use of Recombinant DNA Molecule Technology.
- (6) Require any BSL labs, whether upcoming or currently operating, to obtain permits issued by the San Mateo Department of Health and other appropriate regulatory agencies. Submit all permits to the City to ensure compliance.
- (7) Require BSL labs to have their own institutional biosafety committees to provide the City of San Carlos with floor plans and a description of organisms in use; and to alert the city of any incidents or accidents that happen within 24 hours (or as soon as possible in the event of the accidental leak or release of airborne or highly transmissible pathogens.)
- (8) Require BSL labs to have emergency response plans.
- (9) Require BSL labs to coordinate emergency evacuation procedures with local police, fire, and county emergency response teams and have drills every 6 months.
- (10) Establish a City of San Carlos Biosafety committee for the purpose of reviewing, permitting and monitoring all commercial developments that house BSL labs, including:
 - a. Establishing policies, procedures and criteria to aid in the implementation of any ordinances that govern BSLs.
 - b. Review all amendments to the guidelines or General Plan.
 - c. Review all applications or permits for the use of rDNA and biological materials in San Carlos for compliance with the guidelines and conformity with guidelines from the San Mateo Department of Health and other regulatory agencies.
 - d. Review private labs or institutions manuals, annual worker training programs, health-safety programs and monitoring procedures.
 - e. Determine the manner in which institutions and institutional biosafety committees make reports, applications or recommendations to the San Carlos Biosafety committee.
 - f. Appoint volunteer residents of San Carlos to the Biosafety committee to act as community advocates.
 - g. Require continuing education and appropriate certifications for committee members.
 - h. Provide regular reports to the community about current and new BSL developments, regulations, safety and emergency evacuation procedures, and other relevant information about BSLs in the community.

Thank you for considering our comments and our grave concerns.

Sincerely,

Debbie and Gary Baldocchi

Carmelita Drive

P.S.

We relied, in part, on the following definitions and information in the San Carlos Focused General Plan Update Draft EIR 1-1 October 2022

Chapter 1 Introduction

There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.

THE GENERAL PLAN

As defined by the California Government Code, a general plan is a long-range visionary document that establishes a framework for how a city will grow and change over the next two decades. It establishes goals, policies, and actions guiding growth, conservation, and enhancement. In California, general plans serve as a “constitution” or blueprint for all future development. General plans are required to have chapters or “elements” that discuss land use, circulation/mobility, open space, conservation, noise, environmental justice, air quality, safety, and housing. Our general plan is known as the San Carlos General Plan: Envision 2030.

THE HOUSING AND ENVIRONMENTAL SAFETY ELEMENT UPDATES

1.1 CEQA AND THE PURPOSE OF AN EIR

The City of San Carlos is specifically updating two of its General Plan elements – Housing Element and Environmental Safety Element -- as required to address recent State law mandates. The Housing Element focuses on the provision of adequate housing for all current and future San Carlos residents. The Environmental Safety Element focuses on reducing the potential short and long-term risks resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. Changes to the Housing Element or Environmental Safety Element may necessitate changes to other elements such as the Land Use Element to ensure consistency between the elements. The General Plan elements’ revisions may also necessitate a zoning code or map revisions as well. The revisions will undergo environmental review through an Environmental Impact Report (EIR), which will be prepared in compliance with CEQA requirements.

There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 9 - Gary and Debbie Baldocchi:

These comments are on the merits of the proposed Focused General Plan Update project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues.

The following new action item has been added to the Safety Element:

New Action ESPS-5.6 – Prepare regulations that address biosafety levels (BSL) for new life science, biotechnology, or other scientific developments to ensure a healthy and safe San Carlos community.

No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 10

HUNTER PROPERTIES

10121 MILLER AVENUE
SUITE 200
CUPERTINO, CA 95014
PHONE: 408.255.4100
FAX: 408.996.8425
www.hunterproperties.com

SENT VIA E-MAIL

November 28, 2022

City of San Carlos – Planning Division
Attn: Ms. Lisa Porras
600 Elm Street
San Carlos, CA 94070

RE: Hunter Properties, Inc. – CEQA Comment Letter – San Carlos General Plan Update

Dear Ms. Porras,

Hunter Properties, Inc. hereby submits these comments regarding the Draft Environmental Impact Report (“DEIR”) for the City of San Carlos’s Focused General Plan Update (“GP Update” or “Project”) (SCH # 2021120442). The GP Update specifically proposes to revise the Housing Element (“HE”) and Environmental Safety and Public Services Element (“ESPSE”) of the GP, with minor edits to other Elements for consistency, including the City’s Land Use Element (“LUE”).

The GP Update discusses creating new zoning districts to promote residential development in the City. (Draft HE, pp. 24, 110; DEIR, p. 3-22.) On April 25, 2022, the City of San Carlos (“City”) adopted an ordinance that established a two-year development [moratorium](#) in the Northeast Area of the City (“Moratorium”) where industrial uses are currently located to prohibit “the approval and development of the uses that may conflict with... the introduction of uses contemplated in the Northeast Area Specific Plan, including housing”; presumably industrial uses. The Moratorium and GP Update appear to effectuate the City’s 2022 [Strategic Goals](#), which call for the creation of a [Northeast Area Specific Plan](#) (“NASP”) that will prioritize the creation of housing, biotechnology, and life science uses, presumably to the detriment of the existing industrial uses in the Northeast Area.

It is our understanding that in conjunction with the existing Moratorium and the creation of the NASP, the GP Update will act to greatly weaken the industrial base of the City's economy by reclassifying land so as to make existing industrial uses nonconforming. Overall, the comments presented in this letter urge the City to study and consider the adverse effects upon small businesses, industrial uses, and the City as a whole that are likely to occur as a result of the future land use decisions that the GP Update will authorize. Additionally, we ask that the City reconsider its future plans under the NASP and reaffirm the more limited rezoning decisions made within the Draft HE and GP Update by including language that advocates for new residential units being built on land already zoned for residential or mixed use, rather than rezoning industrial areas.

Hunter Properties and Self-Storage

Hunter Properties owns a self-storage facility within the future NASP area. Self-storage facilities offer a range of benefits to the communities in which they are located. Self-storage is relied upon by many members of the San Carlos community. New jobs, the death of a family member, or the need to downsize all drive demand for self-storage. In addition, due to parking restrictions in the City, residents often turn to self-storage for the practical goal of storing their additional vehicles or boats. Also, small business owners use self-storage for a variety of reasons. Landscapers, general contractors, and other similar types of workers all use self-storage because such facilities are more secure than their homes or a construction yard. Pharmaceutical representatives, home stagers, and a wide variety of other professionals use self-storage to keep their products safe out of their family home. Self-storage simply provides a common solution that no other type of business can provide, and is an important part of a neighborhood's infrastructure.

Environmental Impacts

One of the key stated goals of the City's GP Update is to "facilitate housing growth within the City." (DEIR, p. 1-1.) The Draft HE details how this will be accomplished, and includes a recognition that the NASP will be created. (DEIR, p. 5-6.)

Although the City should be commended for addressing housing affordability issues in the community, the policies proposed in the DEIR, in conjunction with the Moratorium and future NASP, offer an imbalanced solution to the detriment of environmentally innocuous light industrial uses. Under the Draft HE, the City has already planned for new residential needs in excess of its RHNA requirements. (HE, p. 115.) Converting industrial land in the NASP area for residential use thus appears unnecessary. If the City wishes to plan for such additional residential use, this can be achieved by increasing permitted residential densities under the HE without needing to convert industrial land in the NASP area. As explained in this letter, such industrial land is of great value to the City.

Light industrial uses such as storage facilities cause comparatively minimal environmental impacts. The Project Alternatives discussed in the DEIR should adequately consider the reduced environmental impacts available under the scenario of retaining the City's

existing light industrial use categories in future projects such as the NASP that tier from, and must be in conformance with, the GP Update.

As acknowledged in the DEIR, the Project would result in a cumulatively considerable new increase of air pollutant emissions and could expose sensitive receptors to substantial pollutant concentrations. (DEIR, p. 2-5.) Emissions increases due to the increased population needed for the City to meet its RHNA requirements are likely unavoidable. (See DEIR, pp. 4.2-21 – 4.2-24.) But by replacing existing light industrial uses with new residential uses across more neighborhoods of the City, the NASP – enabled by the GP Update – will result in unnecessarily adverse effects to traffic and air quality. The new uses will generate increased traffic because they are more intensive than storage facility uses, and users of the storage facilities will be forced to travel greater distances if the facilities are phased out of these neighborhoods. Thus, the result of preserving the City’s existing light industrial uses is a comparatively lower amount of vehicle miles travelled, traffic, noise, air quality, and land use conflicts that would not be as severe if residential growth was alternatively concentrated in existing residential areas. The Project Alternatives presented in the DEIR fail to take this factor into account.

Furthermore, as acknowledged in the GP Update, there is a greater risk of hazardous materials being present in the soils of sites located on the East Side of the City, where industrial uses currently predominate. (DEIR, p. 4.8-1.) Thus, if future City projects such as the NASP permit residential uses on land currently used for industrial purposes, making them nonconforming, such a decision would increase the environmental risk that sensitive residential receptors will be located on contaminated land. Although the DEIR for the GP Update need not technically address this issue because the GP Update does not yet redesignate notable amounts of industrial area to residential uses, future CEQA documentation, such as that produced for the NASP, will need to assess these risks and will be unable to tier from the DEIR because the DEIR does not in the least analyze such future zoning amendments.

The DEIR states that one of the Project objectives is to protect the community from the harmful effect of hazardous materials. (DEIR, p. 2-25.) The DEIR further states that ESPSE update is meant in part to protect against environmental hazards such as poor air quality and hazardous materials. (DEIR, p. 3-5.) It is our understanding that such language may be applied to future City projects such as the NASP in order to justify the redesignation of industrial areas. However, this narrative conflates heavy industrial and manufacturing uses that may indeed be hazardous with light industrial uses such as storage facilities that present minimal, if any, environmental hazards. For this reason, we request that the GP Update include language in the HE and DEIR acknowledging the need to preserve the City’s existing light industrial base and reaffirming the Draft HE’s policy of concentrating new residential uses in existing residential and mixed-use neighborhoods (“Proposed Language”). (See HE, p. 25, 63, 64.)

GP Element Consistency

State law requires that GP elements be consistent with one other (internal consistency) and that adopted Specific Plans be consistent with a jurisdiction’s GP (vertical consistency). (Gov. Code §§ 65300.5, 65359, 65454.)

With regard to internal consistency, the Proposed Language would be in conformity with goals and policies contained within the City's existing General Plan LUE, which would presumably not be revised as part of the GP Update. (See DEIR, p. 3-22.) For example, Goal LU-6 states that the City should "strengthen the economic vitality of the East Side of the city by encouraging a diversity of commercial uses while protecting and preserving existing industrial uses". (GP, p. 50.) And Policy LU-6.2 specifically instructs the City to ensure that proposed new uses on the East Side "do not introduce land use conflicts that would adversely impact industrial/commercial activities". (GP, p. 50.) One of the related actions called for under the GP is to retain industrial uses on the East Side. (GP, p. 51.)

Because Goal LU-6 is not proposed to be revised as part of the GP Update, if the future NASP converts existing industrial areas to residential uses, it will create an unlawful vertical inconsistency between the NASP and the LUE of the existing General Plan. In addition, adding the Proposed Language to the GP Update would ensure that the new HE and future NASP are consistent with the GP LUE.

The City's Economic Vitality

Policy LU-6.3 under the existing GP supports the expansion of key growth industries but requires that the City maintain "the overall diversity of land uses within East Side employment areas." (GP, p. 51.) The City should consider this policy during the GP Update and any future decisions relating to the industrial economy of the City.

In addition to the environmental benefits of retaining light industrial uses as discussed above, retaining light industrial uses preserves jobs and small businesses in San Carlos and provides for a more diversified and broad tax base.

If the NASP redesignates the industrial areas on the East Side of the City primarily to residential uses, this will affect the local labor market and constrain the supply of land available for local small businesses such as self-storage uses.

Of the existing land uses in the City, all industrial categories combined make up 9.3% of the City's footprint. (DEIR, p. 4.10-1.) This is dramatically lower than the 61.2% of the City's footprint currently used for residential purposes. (DEIR, p. 4.10-1.) If the future NASP redesignates land from industrial uses to residential uses, this disparity will be exacerbated in a manner that presents serious economic risks for the City.

Conclusion

The City should undertake greater study of the broad environmental, economic, and social repercussions of redesignating existing light industrial land to residential uses. The City has many options, and need not undertake this rezoning to meet its RHNA requirements, as evidenced by the draft GP Update.

We urge the City to consider the comments contained herein when finalizing its GP Update and making subsequent related decisions about the role of industrial uses in the City. For the sake of small businesses and in order to promote economic diversity and a balanced community, we ask that the City please take into consideration the foregoing comments.

We thank you for the opportunity to provide these comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Todd C. Trekell", with a stylized, flowing script.

Todd C. Trekell
Hunter Properties, Inc.

Response to Comment Letter 10 - Todd Trekell, Hunter Properties:

The commenter expresses concerns over the future conversion of land zoned light industrial to residential uses under the Northeast Area Specific Plan (NASP), which the commenter feels would be enabled by the proposed project. The commenter further states that the Project Alternatives presented in the Draft EIR fail to take this into account.

The intent of the Alternatives discussion in the Draft EIR is to describe alternatives to the project that would avoid or substantially lessen any of the significant effects of the project, which the Draft EIR identified as being related to air quality, biological resources, and tribal cultural resources. While the Draft EIR acknowledges in the analysis of the No Project Alternative that development would occur within the City as anticipated under the existing General Plan and Housing Element, as well as within future Specific Plan areas including the NASP, conversion of land zoned light industrial to residential within the NASP would be speculative at this point since the NASP process has only recently begun, and such land use changes within the NASP area are not included in the proposed updates to the Housing or Safety Elements. Therefore, it would not warrant analysis in the Alternatives section of this Draft EIR. As the commenter correctly points out, future CEQA documentation will need to assess any proposed conversion of light industrial land to residential within the NASP, and would not be able to tier off of this program EIR.

The commenter asserts that language included in the proposed Safety Element update regarding air quality and hazardous materials may be applied to future projects such as the NASP in order to justify the redesignation of industrial uses, and requests that the proposed GP Update include language in the Housing Element and Draft EIR acknowledging the need to preserve the City's existing light industrial base and reaffirming the Housing Element's policy of concentrating new residential uses in existing residential and mixed-use neighborhoods. Section 3.3.2 Housing Element Update of the Draft EIR provides a summary of the proposed "opportunity sites" where future homes can be constructed and clearly states that the City proposes to meet the RHNA requirements through accessory dwelling unit projections, SB 9 duplex construction projections, and vacant and underutilized sites in residential and mixed-use areas (not industrial areas). The map of opportunity sites provided in the Draft EIR (Figure 3-6) does not show any sites proposed within the NASP or industrially zoned properties.

These comments are primarily focused on the proposed NASP project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required, as part of the Draft EIR. Inclusion of these comments in this Final EIR will make the commentator's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

The commenter will also have the opportunity to participate in planning discussions about the NASP through the NASP community engagement effort which is anticipated to begin in Spring 2023.

Comment Letter 11

From: info@sancarlos2040.org

Date: November 28, 2022 at 1:32:47 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: Don Cox

Organization: 36 year resident of San Carlos

Email: luccaitaly@me.com

Comment:

Thanks to all who clearly spent endless hours studying, participating, analyzing and developing options in the final document for the City of San Carlos. I consider myself an intelligent guy but found it somewhat challenging to read and absorb this document. I also attended several of the community "workshops" over the past several years. I do realize there are many reasons for such a comprehensive and lengthy review but am wondering if there is a way to increase community feedback and buy in with a summary of some kind. I know, easier said than done. Most citizens will not take the time to read several hundred pages. I personally found the data and plan informative but not sure how the ordinary citizen can provide valuable feedback.

Thanks for considering my feedback, as limited as it may be

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 11 - Don Cox:

These comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 12

From: Sean Peters <seanpeters@me.com>

Sent: Monday, November 28, 2022 4:25 PM

To: Gary Baldocchi <gdb357@aol.com>; michael.erbes@gmail.com; Lisa Porras <LPorras@cityofsancarlos.org>; Sara McDowell <SMcDowell@cityofsancarlos.org>; Adam Rak <ARak@cityofsancarlos.org>; John Dugan <JDugan@cityofsancarlos.org>; Ron Collins <RCollins@cityofsancarlos.org>; Laura Parmer-Lohan <lparmerlohan@cityofsancarlos.org>; *Planning Commission <PlanningCommission@cityofsancarlos.org>; Crystal Mui <cmui@cityofsancarlos.org>; Jeff Maltbie <JMaltbie@cityofsancarlos.org>; Al Savay <ASavay@cityofsancarlos.org>; Jen Holmes Peters <jenpeters@sbcglobal.net>; christenhanson@gmail.com; erichanson2@gmail.com; Lou Boris <unclelou15@mac.com>; lorettaboris@me.com; pamgallant4@gmail.com; Joe Haws <joe_haws@yahoo.com>; Danielle deBrier <ddebrier@yahoo.com>; Eric Morse <ericmorse@gmail.com>; barronfmly7@comcast.net; jeffreylkaiser@hotmail.com; joannaam7@hotmail.com; rgranville@wres.com; vzelenko@yahoo.com; ahathawa1975@yahoo.com; shahriar.emami@gmail.com; annecarswell@yahoo.com; babywrenz@gmail.com; tommygee8828@yahoo.com; zolik@comcast.net; amy@imfamily.org; rgludlow@gmail.com; billreeves.sc@gmail.com; Tanya Montano O'Malley <tanya_omalley@yahoo.com>; karenmolinari@gmail.com; johannes.g.stahl@gmail.com; sv_murmur@hotmail.com; johnmcd@hotmail.com; raymondsorensen@yahoo.com; swkonrad@sbcglobal.net; davidsnow919@gmail.com; stanandlydia@gmail.com; gailghose@yahoo.com; camilleaking@gmail.com; Patti@hunsader.com

Subject: Re: Request Ordinances for Biosafety Labs in San Carlos Tonight: 11/28 Deadline to Submit Comments on San Carlos' Public Draft EIR (City Council Meeting Monday, November 28th at 7:00)

Dear Lisa Porras, Mayor McDowell and Members of the City Council,

We have multiple concerns around the public safety, traffic and environmental impacts from the Biosafety labs in the proposed Environmental Safety Element. We also request that you prohibit level 3 or 4 labs in San Carlos. Our town isn't large enough for this type of lab.

Thank you,

Sean and Jen Peters
Carmelita Drive

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 12 - Sean and Jen Peters:

These are comments on the merits of the proposed Focused General Plan Update project and not on the adequacy of the Draft EIR, and do not raise any significant environmental issues.

The following new action item has been added to the Safety Element:

New Action ESPS-5.6 – Prepare regulations that address biosafety levels (BSL) for new life science, biotechnology, or other scientific developments to ensure a healthy and safe San Carlos community.

No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 13

From: info@sancarlos2040.org

Date: November 28, 2022 at 1:02:27 PM PST

To: info@sancarlos2040.org

Subject: Comment from Townsquare

Reply-To: info@sancarlos2040.org

Comment Submitted by:

Name: None Given

Organization: None Given

Email: None Given

Comment:

A couple of recommendations to improve the quality of everyday life in San Carlos.

1. Menlo Park has a "No overnight parking" ordinance that has been in effect since as far back as the 1970's. The ordinance prohibits overnight parking in the streets of Menlo Park, with few exceptions as noted in the ordinance. The ordinance was initiated to prevent theft, to provide clear streets for the street cleaners and to prevent the unsightliness of cars parked in the streets. If you drive down the streets of Menlo Park, you will note how peaceful it is. San Carlos has become a cluttered parking lot of cars, trucks and service vehicles. The streets are so cluttered that it is difficult to pass approaching cars coming from opposite directions. And the drivers do not slow down in the cramped streets when passing other cars, making it unsafe to pass. I would think that if the residents living on Holly Street could handle no overnight parking on their street, the rest of San Carlos could learn to park their cars in their driveways or in their garages.

2. New home or remodel construction by commercial vendors should not be allowed on Saturdays. For most citizens the weekend is a time for rest and recharging. Why does construction take priority over the health and well being of the citizens of San Carlos.

3. It would be nice if you included in the San Carlos publications articles pertaining to the municipal codes of the city. One such article could speak to the responsibilities of dog ownership.

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Chapter 3. Public Comment on the Draft EIR

Response to Comment Letter 13 - (No Name Provided):

These comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 14



CARPENTERS UNION LOCAL 217 SAN MATEO COUNTY

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November 28, 2022

Lisa Porras
Planning Division
City of San Carlos
600 Elm Street, San Carlos, CA 94070
VIA EMAIL: lporras@cityofsancarlos.org

Dear Ms. Porras

Please accept these comments on the above-referenced Housing Element Update on behalf of the members of Carpenters Local 217, which represents working men and women in San Carlos and San Mateo County. We appreciate the opportunity and look forward to working together on this important endeavor.

To meet the urgent need for housing units outlined in the State's Regional Housing Needs Allocation (RHNA), as well as the policy goals outlined in the San Carlos Housing Element and larger General Plan, it is vital that San Carlos support efforts to build the local construction workforce. Local 217 has long been at the forefront of training the next generation of construction workers, opening pathways to the industry for diverse and traditionally underserved populations, and embracing new technologies and delivery methods to expedite the construction of much-needed housing.

Without policy intervention, San Carlos is not likely to reach its 2,735 RHNA housing unit goals within the next 8 years. These goals are 358% higher than the 5th cycle RHNA goals. Additionally, 28% of San Carlos households are overpaying for housing, including 67% of lower income households. To address the housing needs of all San Carlos residents, particularly those who experience a housing cost burden, San Carlos should pursue policies that facilitate equitable housing development.

There are practical solutions to address housing shortages in San Carlos by utilizing high-road labor. To support the policy goals of the Housing Element, Local 217 is requesting that the City add local hire and apprenticeship requirements to the final Housing Element for all residential construction projects larger than 10 units. The standards Local 217 is proposing in this comment letter would help to ensure greater benefits for the broader community, help ensure that construction labor needs are met, and guarantee that new residential development projects within the City are making needed investments in the region's skilled construction industry workforce.

The City Should Bar Issuance of Building Permits Unless Each Future Residential Development of 10 units or Above has a Viable Apprenticeship Program and Local Hiring Requirements

The Carpenters propose the following additions to the Municipal Code of San Carlos for any residential project larger than 10 units:

Permitting requirements in the Municipal Code of San Carlos.

A person, firm, corporation, or other entity applying for a building permit under the relevant section of the Municipal Code of San Carlos, California shall be required to comply with the apprenticeship, healthcare, and local hire requirements of the Housing Element and General Plan. Failure to comply with the requirements set forth in this section shall be deemed a violation of this article.

Apprenticeship:

For every apprenticeable craft, each general contractor and each subcontractor (at every tier for the project) will sign a certified statement under penalty of perjury that it participates in a Joint Apprenticeship Program Approved by the State of California, Division of Apprenticeship Standards OR in an apprenticeship program approved by the State of California Division of Apprenticeship Standards that has a graduation rate of 50% or higher and has graduated at least thirty (30) apprentices each consecutive year for the five (5) years immediately preceding submission of the pre-qualification documents. The contractor or subcontractor will also maintain at least the ratio of apprentices required by California Labor Code section 1777.5.

Local Hire Policy:

Contractor will be required to provide documentation that the contractor will hire a minimum of twenty-five percent (25%) of staff for any job classification with more than four (4) employees employed whose primary residence, which is not a post office box, is, and has been, within San Mateo county within 180 days of the expected date of issuance of the Notice to Proceed for the project.

As the number of jobs in San Carlos continues to grow, an intervention is necessary to support the already strained housing market. From 2019-2028, San Francisco and San Mateo Counties are projected to introduce 120,200 new jobs. Despite having access to increased employment opportunities, workers employed in San Carlos are unable to find housing within the city. Ninety-two percent of people who work in San Carlos, live outside of the city. For workers able to find housing within the city, many risk displacement due to rising housing and labor costs. Investing in the high road residential construction workforce ensures that community members have the opportunity to live in the community they work in.

Local 217 has implemented many programs that will enable the City to meet the General Plan and Housing Element goals. These programs include a robust Joint Apprenticeship Training Committee, vigorous utilization of apprentices in San Carlos, healthcare coverage for all members and their families, and innovation within the construction industry.

Joint Apprenticeship Training Committees (JATC's), such as the Carpenters Training Committee for Northern California (CTCNC), are a proven method of career training built around a strong partnership between employers, training programs and the government. This tripartite system is financially beneficial not only for the apprentice, but is a major benefit for the employer and the overall economy of San Carlos. The CTCNC monitors current market conditions and adjusts the workflow of apprentices to meet the needs of the community, heading off any shortage of skilled workers. History has demonstrated that strong utilization of apprentices throughout the private sector helped California builders produce millions of units of housing.

Response to Comment Letter 14 – Ed Evans, Carpenters Union Local 217 San Mateo County:

Not allowing building permits for residential projects of 10 units or more, unless it has a viable apprenticeship program and hires locally, is considered a constraint to housing production. Staff does not recommend this as a citywide policy, but recognizes that two new laws, SB6 and AB2011, both require payment of prevailing wages and, for projects with more than 50 units, apprenticeship programs when building housing with ministerial approval *in commercial zones*. SB 35, which provides a ministerial approval process for housing in residential zones, also requires payment of prevailing wages.

These comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues. No further response is required. Inclusion of these comments in this Final EIR will make the commentor's views available to the City of San Carlos Planning Commission, the San Carlos City Council, and other public officials who will make decisions about the proposed project.

Comment Letter 15

From: <info@sancarlos2040.org>

Date: Wed, Nov 23, 2022 at 6:13 PM

Subject: Comment from Townsquare

To: <info@sancarlos2040.org>

Comment Submitted by:

Name: Robert Tomkinson

Organization: None Given

Email: rtomkinson@yahoo.com

Comment:

Thank you for circulating documents and seeking our input and feedback.

My main feedback is that despite spending an hour reading the Public Draft EIR, I have almost no idea what is being proposed, and what it's impact on me will be.

The report needs a really plain English summary - like a voter guide has, to simplify what it is even talking about. Even the Exec Summary, which starts many pages in, is loaded with inside baseball phrases, making hard for even an interest lay citizen to get to grips with what this is all about. e.g. "Housing Element"? Does that means "Houses and apartments"? I think what is being proposed is to change zoning so that San Carlos can add more housing, in line with state law. These changes will be in certain areas of the city. And this report talks about how that can be done and the environmental and other impacts. The implication for residents is that some blocks will be eligible to have apartments built where there are only houses now, and more granny flats will be permitted. Is that about right? Will anyone be required to sell their property? Or required to modify it? Or prohibited from (say) remodeling it? That's what I'm looking for.

I own two houses: 501 Cedar St (which is long-term rented out), and 339 Cedar St (where we live). I know that 501 Cedar St is zoned for medium density housing now. I think it's currently in Medium Density RM-59, according to figure 3-5. I cannot tell how that is changing because on the subsequent maps there are so many colors I can't tell which shade of brown or magenta is which. And that matters. I request you make a website where I can type in my address and it will say: here's your current zoning; and here's what is proposed. Please do that. It would be a v simple database lookup program.

I am guessing from the maps, about 80% of San Carlos will see no change. But for those who are, this doc is unintelligible, which is not fair. On the 500 Block of Cedar, we've already been rezoned without anyone (even real estate professionals who live there) knowing about it. So I very much want to know what is proposed this time, and how it could affected the value of my house, and my rights and options as an owner, especially if I want to sell or to remodel.

I am pleased to see what I think is protection of trees. Trees are vital for healthy cities. Where we have more, it makes a big difference - even keeping the area cooler and the people healthier, so I would like to see big trees protected and more trees planted.

Thank you,

Robert

See all comments.

https://www.sancarlos2040.org/mail_forms/listing

Response to Comment Letter 15 – Robert Tomkinson

The Draft Program EIR has been prepared by the City of San Carlos in accordance with the California Environmental Quality Act, including CEQA (Public Resources Code sections 21000-21178.1), the State CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000-15387). This Final EIR has been prepared in accordance with State CEQA Guidelines Section 15132 (Public Resource Code section 21100-21100.01). The City has followed all CEQA Statutes and Guidelines in the preparation of the EIR. The impact analysis is based on clearly identified thresholds of significance and impact analysis and provides a clear statement of impact before and after mitigation.

The commenter expresses frustration in understanding what the Housing Element is, its goals and how it affects the commenter's properties. All California cities and counties are required to have a Housing Element included in their General Plan. In order to meet the needs of the residents in the region, the City has been assigned by the Association of Bay Area Governments a Regional Housing Needs Allocation (RHNA) of 2,373 housing units, to be provided by the City within the eight-year time period of 2023 - 2031

As such, the proposed Housing Element has been prepared to respond to current and near-term future housing needs in San Carlos and also provide a framework for the community's longer-term approach to addressing its housing needs. The Housing Element contains goals, updated information, and strategies (policies and implementing actions) that the City is committed to undertaking.

The Housing Element applies to all housing units within the City including single family homes, apartments (condos), townhomes, and accessory dwelling units. The Housing Element policies do not require anyone to sell their property, nor does it require property owners to remodel their properties, nor does it prohibit remodeling.

Regarding changes to the current zoning of 501 and 339 Cedar Street, 501 Cedar Street is proposed to change from RM-59 to RM-100, and 339 Cedar Street will remain at its current designation of RS-6.

As these comments do not address the adequacy of the Draft EIR, and do not raise any significant environmental issues, no further response is required.

CHAPTER 4. ERRATA

This chapter includes the changes to the Draft EIR needed to respond to comments and clarify or amplify the information provided in the Draft EIR. The changes correct inaccuracies and clarify the analysis in the EIR. Text removed from the Draft EIR is marked with ~~strike-out~~. New text is indicated by underline. **Bold underline** text is used to denote added text to existing General Plan policies that were not originally included in the Draft EIR.

Page 3-22; Paragraph 4, and Page 4.10-12, Paragraph 4:

Action LU-1.8: Amend the Zoning Ordinance to address the new multiple-family and mixed-use designations as part of the 2023 Focused General Plan Update.

Page 3-23, Paragraph 2 and Page 4.10-13; Paragraph 3:

Policy LU-9.14: Legally nonconforming multi-family residential structures located within multi-family residential zoning districts may be replaced, restored, or rebuilt, or repaired and used consistent with the Zoning Ordinance in effect at the time the structure was originally constructed only upon issuance of a conditional use permit approved by the Planning Commission at the time of the replacement, restoring, or rebuilding.

Page 3-24, After Paragraph 2 (bold underline** text is new text to the existing General Plan policy):**

One policy is being updated to specifically reference the San Carlos Bicycle and Pedestrian Master Plan:

Policy 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.**

Page 3-24, After Paragraph 4, and Page 4.10-13, After Paragraph 4:

- *Policy LU-9.10:* ~~In the event of closure of a school, the primary planned use of these sites re-mains for school and associated recreation purposes, or housing. The school site should be considered for acquisition by the City.~~ On school and formerly school sites, allow low and moderate income rental housing units made available to local educational employees, local public employees, and then the general public at densities and development standards in accordance with AB2295, 2022.
- *Policy LU-9.21:* Consider allowing public school districts and local private schools to provide affordable housing units on school or school-related sites concurrent with continued school operations.

Chapter 4. Errata and Revisions

- Action LU-9.3: Update development standards to allow for single family attached, multiple family detached, and/or multiple family attached affordable housing units to be constructed and maintained concurrent with school operations.

Page 3-24 Add new paragraph after Paragraph 2 (bold underline** text is new text to the existing General Plan policy):**

One policy is being updated to specifically reference the San Carlos Bicycle and Pedestrian Master Plan.

Policy EM-11.4: Provide an integrated network of bicycle and pedestrian thoroughfares that connects jobs and housing to other city destinations, **as recommended in the City's Bicycle and Pedestrian Master Plan.**

Page 4.10-13: Add New Last Paragraph (bold underline** text is new text to the existing General Plan policy):**

Policy EM-11.4: ~~Coordinate with neighboring jurisdictions, the County and regional agencies to expand bicycle connections to regional destinations.~~ Provide an integrated network of bicycle and pedestrian thoroughfares that connects jobs and housing to other city destinations, **as recommended in the City's Bicycle and Pedestrian Master Plan.**

Page 4.8-19, New Paragraph 8:

Action ESPS-5.6: Prepare regulations that address biosafety levels (BSL) for new life science, biotechnology, or other scientific developments to ensure a healthy and safe San Carlos community.

Page 4.8-26, Paragraph 1; Page 4.16-22, Paragraph 4; Page 4.16-26, Paragraph 12:

Action ESPS-3.7: Adopt a formal written policy ~~Periodically re-evaluate the City's policy regarding the City's policy allowing rebuilding in the VHFHSZ. Periodically, re-evaluate the policy to assure consistency with State law and local preferences. allowing rebuilding in the VHFHSZ. If the policy is unwritten, adopt a formal written policy.~~

San Carlos Focused General Plan Update Project

Appendix A: Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

CEQA Statute Section 21081.6 and State CEQA Guidelines Section 15097 require a public agency to adopt a reporting or monitoring program (MMRP) to ensure compliance with the mitigation measures adopted by the agency at the time of project approval. A mitigation monitoring program would therefore be required for the San Carlos Focused General Plan Update EIR to ensure compliance with the mitigation measures that are adopted and incorporated into the project. Adoption of the MMRP would occur at the time of project approval.

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

“When adopting a final EIR with findings as required under 14 CCR section 15091(a)(1) the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects” (§15097(a)); and

“The Lead Agency may choose whether its program will monitor mitigation, report on mitigation, or both. “Reporting” generally consists of a written compliance review that is presented to the decision-making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. “Monitoring” is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both.” (§15097(c))

The table beginning on the next page lists the impacts, mitigation measures, and timing of the mitigation measure (when the measure will be implemented) related to the Project. The “Impact” column lists each significant impact, by resource topic, that is identified in the EIR and for which mitigation measures are recommended. The “Mitigation Measure” column provides the full text of each mitigation measure identified in the EIR. The “Monitoring” column describes (1) the “implementation entity” responsible for carrying out each mitigation measure (such a “project applicant” or “City of San Carlos Planning Division and Building Division”); (2) mitigation implementation timing requirements (e.g., at the completion of a particular future individual project development review or construction phase, prior to occupancy, or when some other specific threshold is reached); and (3) the entity responsible for performing the monitoring of each mitigation measure (the “monitoring and verification entity;” e.g., a City department or agency, another public agency, or some other entity).

According to CEQA Guidelines Section 15126.4(a)(2), “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” Therefore, all mitigation measures as listed in this MMRP will be adopted by the City of San Carlos when the project is approved.

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
Air Quality						
<p>Impact AIR-1: The project would conflict with or obstruct implementation of the applicable air quality plan.</p> <p>This impact would be considered significant and unavoidable even with the incorporation of feasible mitigation measures. (Significant and Unavoidable Impact)</p>	<p>Mitigation Measure AIR-2: Require a Project-level Construction Assessment for New Discretionary Development Projects.</p> <p>The City shall require applicants to submit a quantitative project-level construction criteria air pollutant and toxic air contaminant emissions analysis for future discretionary development projects that are not exempt under CEQA and do not meet the BAAQMD screening criteria. The estimated construction criteria air pollutant and toxic air contaminant emissions shall be compared against the thresholds of significance maintained by the Bay Area Air Quality Management District (BAAQMD) and, if emissions are shown to be above BAAQMD thresholds, the City shall require the imposition and implementation of mitigation measures to reduce emissions below the thresholds that have been exceeded. Mitigation measures to reduce emissions could include, but are not limited to:</p> <ul style="list-style-type: none">• Selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime);• Requiring equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier	Project Applicant	City of San Carlos Planning Division and Building Division	Prior to discretionary project approval.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>IV Final emissions standards for equipment greater than 50-horsepower), and/or utilizing added exhaust devices (e.g., Level 3 Diesel Particular Filter);</p> <ul style="list-style-type: none"> Minimizing the idling time of diesel-powered construction equipment to two minutes; and Application of Low-VOC paints to interior and/or exterior surfaces (e.g., paints that meet BAAQMD Regulation 8 Rule 3 requirements). 					
<p>Impact AIR-2: The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard.</p> <p>Implementation of Mitigation Measure AIR-2 would reduce construction criteria air pollutant and toxic air contaminant emissions to a level that is below the BAAQMD-recommended threshold of significance. However, it cannot be definitively</p>	See Mitigation Measure AIR-2, above	Project Applicant	City of San Carlos Planning Division and Building Division	Prior to discretionary project approval.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
known or stated at this time that all future development projects occurring under implementation of the proposed project would be able to reduce potential criteria air pollutant emissions to levels that are below BAAQMD thresholds. This impact would be considered significant and unavoidable even with the incorporation of feasible mitigation measures. (Significant and Unavoidable Impact)						
Impact AIR-3: The project could expose sensitive receptors to substantial pollutant concentrations. Implementation of Mitigation Measure AIR-2 would reduce construction criteria air pollutant and toxic air contaminant emissions to a level that is below the BAAQMD-recommended threshold of significance. However, with regard to localized criteria air pollutant and	See Mitigation Measure AIR-2, above.	Project Applicant	City of San Carlos Planning Division and Building Division	Prior to discretionary project approval.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
<p>TAC emissions generated during future construction activities it cannot be definitively known or stated at this time that all future development projects occurring under implementation of the proposed project would be able to reduce potential criteria air pollutant and TAC emissions to levels that are below BAAQMD thresholds. This impact would be considered significant and unavoidable even with the incorporation of feasible mitigation measures. (Significant and Unavoidable Impact)</p>						
<p>Impact AIR-5: The project could cause substantial adverse cumulative impacts with respect to Air Quality.</p> <p>Because future construction activities could result in ozone precursor and PM emissions that exceed BAAQMD thresholds, the project could increase the</p>	See Mitigation Measure AIR-2, above.	Project Applicant	City of San Carlos Planning Division and Building Division	Prior to discretionary project approval.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
frequency and/or severity of air quality violations in the Bay Area Basin or otherwise impede attainment of air quality standards. (Significant and Unavoidable Impact)						
Biological Resources						
Impact BIO-1: The project could have a significant adverse effect, either directly or through habitat modifications, on any species listed as candidate, sensitive or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U. S. Fish and Wildlife.	Mitigation Measure BIO-1: Project-Specific Biological Resources Evaluation. Prior to construction of new housing on sites that are on or adjacent to natural vegetation or aquatic habitat, and/or vegetation thinning or creation of fuel breaks, a project-specific biological resources evaluation shall be conducted by a qualified biologist. The biologist shall utilize relevant resources such as the California Natural Diversity Database (CNDDB) and the National Wetlands Inventory (NWI) as well as a field survey covering the project site and adjacent areas. A biological resources report or memo shall be prepared documenting the results of the evaluation, to a level of detail appropriate for the project. At a minimum, the report or memo shall include a description of existing vegetation, habitats, and aquatic features on the project site; an evaluation of special-status species and sensitive habitats that could occur on the site; and suitable mitigation measures as needed to avoid project-related impacts to biological resources. Mitigation measures from the biological resources evaluation shall be incorporated into the CEQA	Project Applicant	City of San Carlos Planning Division and Public Works Department	Prior to Issuance of any Demolition, Grading, or Tree Removal Permits.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	document for the project and/or adopted as project conditions of approval. Applies To: New housing development on sites that are on or adjacent to natural vegetation or aquatic habitat, vegetation thinning and creation of fuel breaks.					
Impact BIO-2: The project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Mitigation Measure BIO-2: Nesting Birds. To avoid impacts to nesting birds and avoid potential violation of state and federal laws pertaining to birds, all construction of new housing (including but not limited to mobilization and staging, clearing, grubbing, tree removal, fence installation, demolition, and grading) and/or vegetation thinning and creation of fuel breaks should occur outside the avian nesting season (that is, prior to February 1 or after September 15) if possible. If construction and/or vegetation thinning or creation of fuel breaks occurs within the avian nesting season (from February 1 to September 15), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is building a nest, sitting in a nest, a nest has eggs or chicks in it, or adults are	Project Applicant	City of San Carlos Planning Division and Public Works Department	Prior to Issuance of any Demolition, Grading, or Tree Removal Permits.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>observed carrying food to the nest. The results of the surveys shall be documented.</p> <p>If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist, until the chicks have fledged. Monitoring shall be required to ensure compliance with Migratory Bird Treaty Act (MBTA) and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented.</p> <p>Applies To: All housing construction and/or vegetation thinning and creation of fuel breaks during the nesting bird season (February 1 through September 15).</p> <p>Mitigation Measure BIO-3a: Bat Habitat Assessment. Prior to removal of trees or structures for housing development or fire hazard reduction, a qualified biologist shall conduct a bat habitat assessment of trees and structures to be removed, as well as surrounding trees and structures. The biologist shall search for large cavities and crevices in trees and structures that could support maternity roosts as well as habitat for special-status bat species. Signs of bats such as guano</p>					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>or the smell of bats shall also be noted. Results of the bat habitat assessment shall be documented.</p> <p>If no suitable roosting habitat or signs of bats are found, then no further action is required, and the project may proceed as planned. If suitable roosting habitat or signs of bats are found, then Mitigation Measure 3b shall be implemented.</p> <p>Mitigation Measure BIO-3b. Dusk Emergence Bat Survey: If suitable roosting habitat or signs of bats are found in trees or structures to be removed on a new housing site or fire fuel reduction area, a qualified biologist shall conduct a dusk emergence survey for roosting bats within 14 days prior to the removal of the tree(s) or structure(s). The biologist shall monitor all suitable roosting trees and structures at dusk for emerging bats, using acoustic equipment to identify the species. Results of the survey shall be documented.</p> <p>If no roosting bats are found during the survey, then no further action is required, and the project may proceed as planned. If roosting bats are found during the survey, a disturbance-free buffer zone shall be established around the roost site during the maternity season (April 15-September 15), as determined by a qualified biologist until the maternity season is over. Outside the maternity season, roosting bats may be excluded from the tree(s) or structure(s) prior to tree removal as directed by</p>					

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>a qualified biologist. If a special-status bat is found, the roosting site shall be preserved if feasible and CDFW shall be consulted prior to exclusion.</p> <p>Applies To: Any housing project or fuel reduction project that requires removal of trees or structures.</p>					
<p>Impact BIO-3: The project could 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.</p>	See Mitigation Measure BIO-1, above.	Project Applicant	City of San Carlos Planning Division and Public Works Department	Prior to Issuance of any Demolition, Grading, or Tree Removal Permits.		
<p>Impact BIO-4: The project would not 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.</p>	See Mitigation Measure BIO-1, above.	Project Applicant	City of San Carlos Planning Division and Public Works Department	Prior to Issuance of Grading Permits.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
Impact BIO-5: The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	See Mitigation Measures BIO-1, BIO-2, and BIO-3a & 3b, above.	Project Applicant	City of San Carlos Planning Division and City of San Carlos Building Division and Public Works Department	Prior to discretionary project approval. Prior to Issuance of any Demolition, Grading, or Tree Removal Permits.		
<i>Tribal Cultural Resources</i>						
Impact TRIB-1: The project could cause a substantial adverse change in the significance of a Tribal Cultural Resource.	Mitigation Measure TRIB-1: Consider all Native American Archaeological Discoveries to be Significant Resources. All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 until the lead agency has enough evidence to make a determination of significance. The City shall coordinate with an archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications, as well as an appropriate tribe or tribes, as determined by the NAHC, 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. An archaeological report shall be written detailing all	Project Applicant	City of San Carlos Planning Division and Public Works Department	Immediately following the discovery of subsurface archaeological materials.		

IDENTIFIED IMPACT	RELATED MITIGATION MEASURE	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	archaeological finds and submitted to the City and the Northwest Information Center.					

NOTES:

S = Significant Impact

LTS = Less than Significant Impact

SU = Significant Unavoidable Impact