

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

841 OLD COUNTY ROAD PROJECT

PREPARED FOR:

City of San Carlos

PLANNING DIVISION
600 ELM STREET
SAN CARLOS, CA 94070



JANUARY 2023

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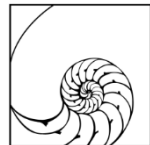


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INTRODUCTION TO THIS DOCUMENT

This document serves as the Initial Study and Mitigated Negative Declaration for the 841 Old County Road project (“project”). Full project application materials are available from the City of San Carlos Planning Division for review upon request.

Per CEQA Guidelines (Section 15070), a Mitigated Negative Declaration can be prepared to meet the requirements of CEQA review when the Initial Study identifies potentially significant environmental effects, but revisions in the project and/or incorporation of mitigation measures agreed to by the applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur and there is no substantial evidence in light of the whole record that the project as revised may have significant effect on the environment.

This document is organized in three sections as follows:

- **Introduction and Project Information.** This section introduces the document and presents the project description including location, setting, and specifics of the lead agency and contacts.
- **Mitigated Negative Declaration.** This section lists the impacts and mitigation measures identified in the Initial Study Checklist and proposes findings that would allow adoption of this document as the CEQA review document for the proposed project.
- **Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions and identifies the potential for impacts and proposed mitigation measures to avoid these impacts.

Full project application materials are available for review upon request from the Planning Division at City of San Carlos (see contact info below).

STANDARD CONDITIONS

There are regulations and policies applicable to the project that would be considered uniformly applied development policies or standards pursuant to CEQA Guidelines section 15183.3(7), or “Standard Conditions”. These Standard Conditions are incorporated into a project regardless of the project’s environmental determination, and are therefore considered prior to determination of significance and are not considered mitigation under CEQA. Specifics of applicable Standard Conditions are presented in Table 1 (page 11) and discussed under the relevant topic areas throughout this document.

PUBLIC REVIEW

This Initial Study will be circulated for a 30-day public review period. Comments may be submitted in writing by email or regular mail to the following address:

City of San Carlos
Planning Division
Lisa Costa Sanders, Principal Planner
600 Elm Street
San Carlos, CA 94070
Email: LCostaSanders@cityofsancarlos.org

PROJECT INFORMATION

All figures for the project information are included together on pages 6 through 13.

PROJECT ENTITLEMENTS

Development of the project would require the following approvals from the City of San Carlos: a Planned Development Rezoning, Planned Development Permit, Design Review Permit, Development Agreement, Lot Merger/Lot Line Adjustment (to be determined), Grading and Dirt Haul Certificate, and Transportation Demand Management Program.

Because the project is located in the San Carlos Airport Land Use Compatibility Plan area, the project would be subject to Airport Land Use Commission review and approval.

The project is required to comply with Municipal Regional Permit requirements related to stormwater pollution prevention.

LEAD AGENCY

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

CONTACT PERSON

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Email: LCostaSanders@cityofsancarlos.org

PROJECT SPONSOR

The Sobrato Organization
Contact: Jeffrey Sobrato
599 Castro Street, Mountain View, CA 94041
Phone: 1-408-691-1125
Email: jeff@sobrato.com

PROJECT LOCATION AND EXISTING USES

The 3.4-acre project site (Assessor's Parcel Numbers 046-133-160, 046-134-050 and -060; 046-135-010, -020, -030, and -040; and 046-182-100, -110, and -150) is located in the City of San Carlos, California. The subject property consists of six legal land parcels with the addresses of 803, 821, 833, 841 and 851 Old County Road, and one legal land parcel that is an unaddressed former railroad spur. The project site is bounded by Bransten Road to the north, Old County Road to the west, Commercial Street to the south, and development and parking on the Commercial Street and Bransten Road parcels to the east. **Figure 1** shows the project location and **Figure 2** shows the project site and existing conditions.

The project site has been developed with one- and two-story buildings and associated asphalt paved roadways and parking area, landscaped areas and a paved yard for gravel, sand, and mulch storage in stacked block stalls. The property at 803, 821, and 833 Old County Road is currently occupied by San Carlos Garden Supply store, a garden supply store for hardscapes, gravel, sand and mulch and storage and sales. The property at 841 Old County Road is currently occupied by NPC Expert Tree Services, a tree pruning and service company. The property at 851 Old County Road is currently occupied by Peninsula Pet Resort, a pet (canine and feline), boarding, daycare, and grooming facility.

The project site is at an elevation of approximately 20 feet above mean sea level and is relatively flat, regionally sloping to the east-northeast. The nearest surface water body is Pulgas Creek, located approximately ¼-mile southwest of the project site. The depth to groundwater is approximately 4 feet below ground surface and the groundwater flow direction is generally to the north.

The site is impacted by contamination from historic and adjacent uses. The main contamination of concern is petroleum-hydrocarbon in the soil and groundwater. Removal of impacted soil is proposed as part of the project as further discussed in Section 9: Hazards and Hazardous Materials.

GENERAL PLAN DESIGNATION / ZONING

Planned Industrial / Heavy Industrial (IH)

SURROUNDING LAND USES

The project site is located adjacent to industrial uses to the north, office and commercial spaces to the east, and the proposed site of the Alexandria Center for Life Science project to the south. Road and elevated train corridors are adjacent to the project to the west, providing a buffer of at least 250 feet to the development on the far side of El Camino Real, which includes retail, hotel/motel, and mixed-use residential development.

The closest residential uses to the project are located across the rail line and El Camino Real to the west, starting as close as about 500 feet from the project site. The Greater East San Carlos neighborhood has single family homes located as close as approximately 720 feet to the north of the project site.

The San Carlos Airport is located approximately 1,000 feet to the northeast of the project.

PROJECT DESCRIPTION

Overview and Building Massing

The proposed project would involve the demolition of all existing buildings and site improvements and the construction of two new office / research and development (R&D) buildings: a 5-story, 193,852 square foot building, and a 4-story, 131,621 square foot building, with maximum heights of approximately 90 and 113 feet respectively, above a two-level underground parking structure. Project site improvements would also include a courtyard between the buildings, sidewalks, landscaping, and lighting along Commercial Street and Old County Road.

The applicant is targeting life science tenants. While specific tenants have not been identified at this time, this document assumes the highest potential impact in any given environmental topic area given the flexibility in the future mix of office and/or R&D. For example, peak hour trip generation would be highest for 100 percent office occupancy, so that assumption has been used for the analysis of transportation and all-R&D occupancy or a mix of the two types of uses would have trips and related

impacts within that analyzed. Emissions would be highest from 100 percent R&D occupancy so that assumption has been used for the emissions analyses and all-office occupancy or a mix of the two types of uses would have emissions and related impacts within that analyzed.

The buildings would be setback approximately 11 feet at ground level along Old County Road, with the north building setback approximately 7 - 8 feet along Bransten Road and the south building setback approximately 2 ½ feet along Commercial Street. The architectural design is intended to respect the San Carlos innovation and industrial character through the use of natural materials, including red brick masonry and terracotta. Upper-level terraces would be incorporated to increase active outdoor spaces that can be used by the tenants.

The project would redevelop a site already provided with utilities and services. Utility connections would be made to lines in adjacent streets that are either already existing or will be upgraded through coordination with the nearby Alexandria Center for Life Science project.

Figure 3 shows site plan. **Figure 4** shows the grading and drainage plan. **Figure 5** shows the utility plan. **Figures 6, 7, and 8** show the building section, elevations, and renderings.

Access & Parking

The project site is accessible by automobile, train, and bus, and would include on-site facilities for pedestrians and bikes.

Rail: The project site is located 0.46 miles south of the San Carlos Caltrain Station, a regional rail corridor that provides connectivity between San Francisco and San Jose, with limited service to Gilroy during commute hours.

Bus: The project site is located approximately 500 feet from the El Camino Real/Arroyo Avenue SamTrans bus stop, serviced by routes ECR, 397, and 398.

Automobile/Truck: Primary project site access is from Commercial Street and Bransten Road, with secondary entrances at the corners of Old County Road.

Bicycle and Pedestrian Access: Pedestrian and bicycle access is available from the Caltrain Station and downtown San Carlos. Changes are planned to provide improved continuous access to transit stations (see Transportation section for more details).

Structured parking would be provided in 2-stories below grade, with approximately 745 parking spaces to serve the office/R&D tenants. In addition, there would be 55 long term/80 short term bicycle parking spaces.

Construction

Project construction activities are anticipated to span approximately 3 years. Demolition and abatement would run approximately 1.5 months, followed by 6 to 7 months for excavation and construction of the underground parking garage. The north building and surrounding site construction is estimated to take 13 months. There may be a break in construction between completion of the north building and initiation of construction of the south building, but for purposes of this analysis, it was assumed construction would proceed without delay, which would result in the most conservative analysis. The south building and surrounding grounds are estimated to span approximately 14 months.

The project would involve removal of contaminated soil and excavation for subsurface parking extending to depths of up to about 25 feet below ground surface. An estimated 121,000 cubic yards of soil is expected to be exported from the project site. Construction dewatering would be necessary during excavation as further discussed in Section 7: Geology and Soils and Section 10: Hydrology and Water Quality.

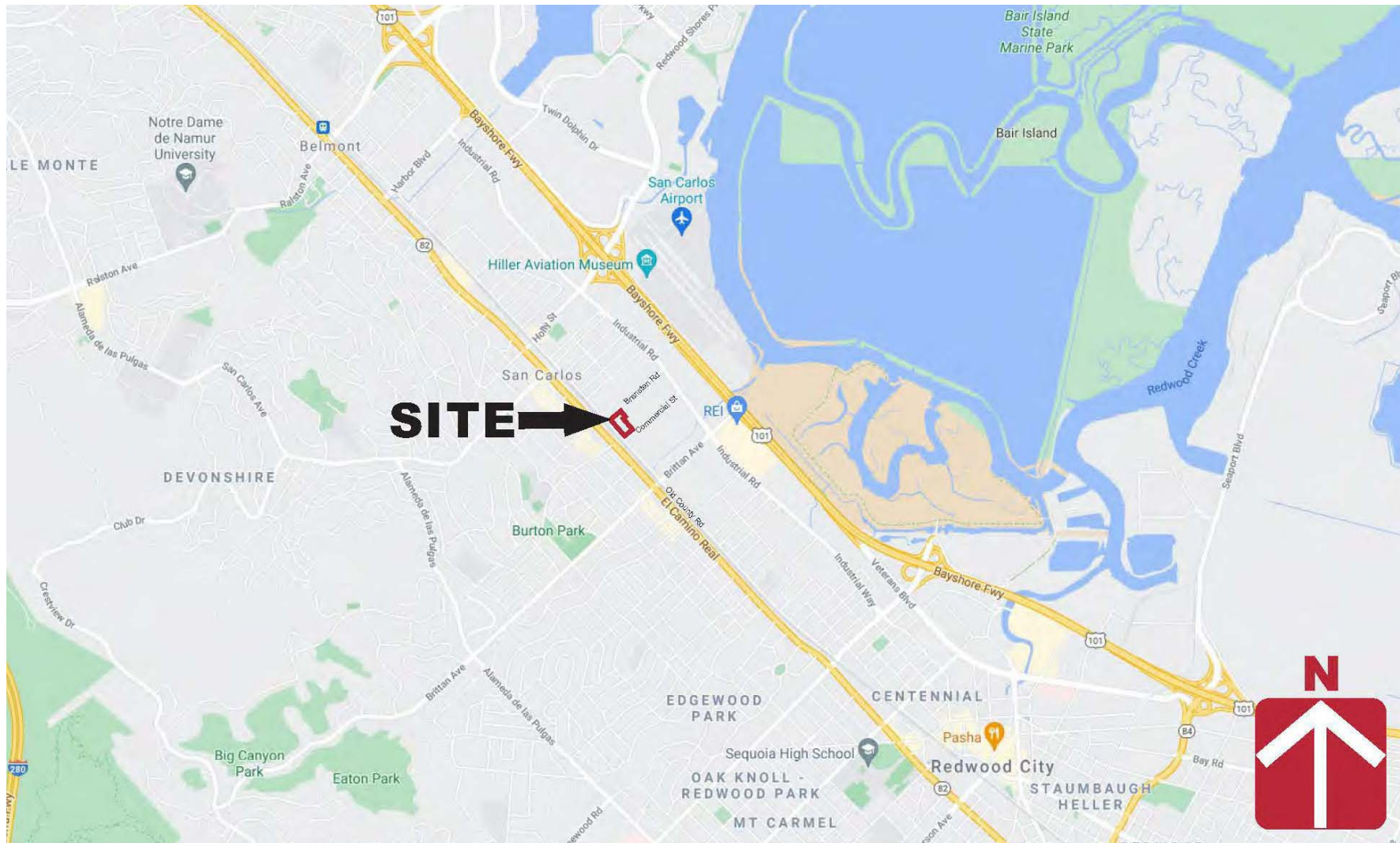


Figure 1: Project Location
Source: Cornerstone Earth Group, 2021

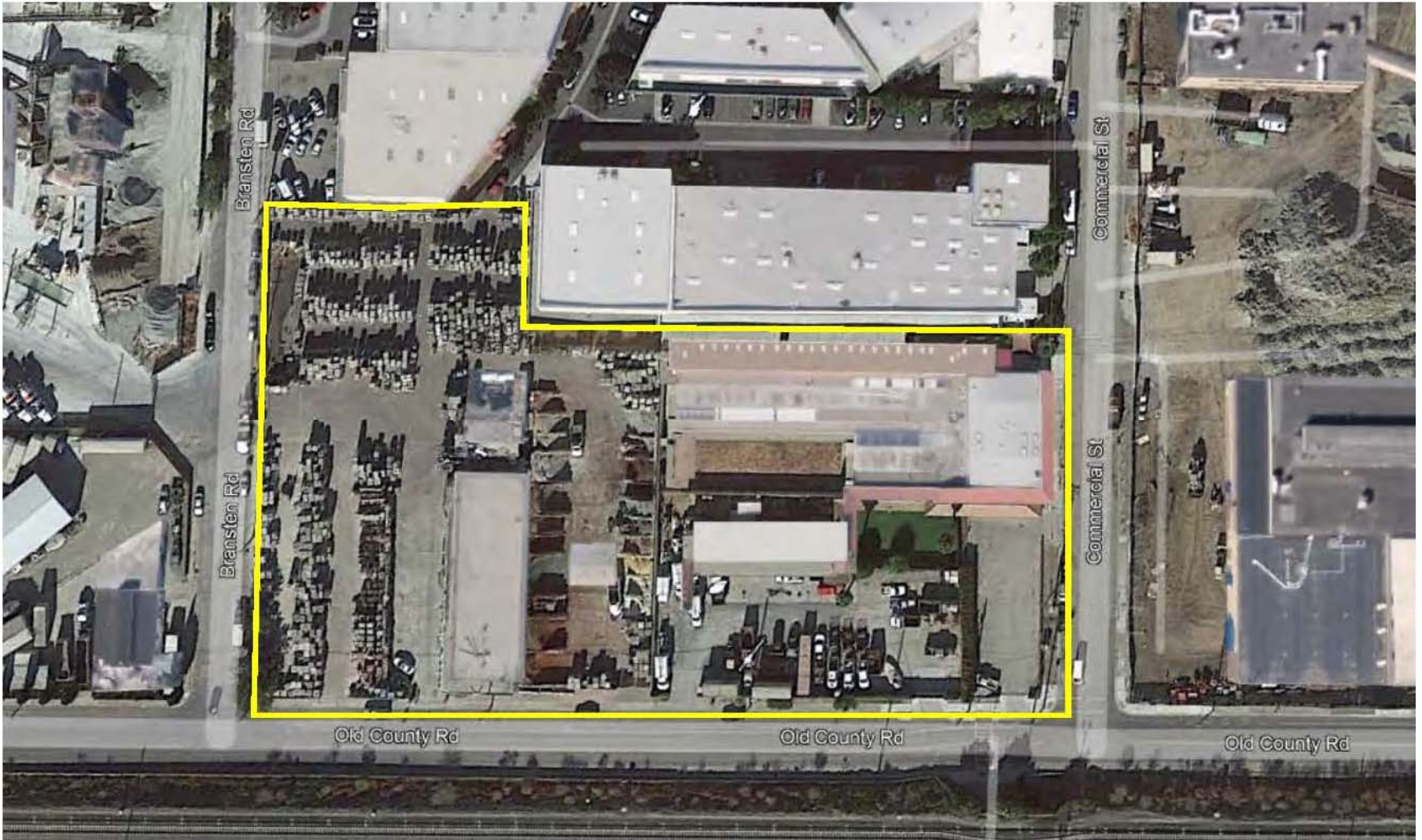
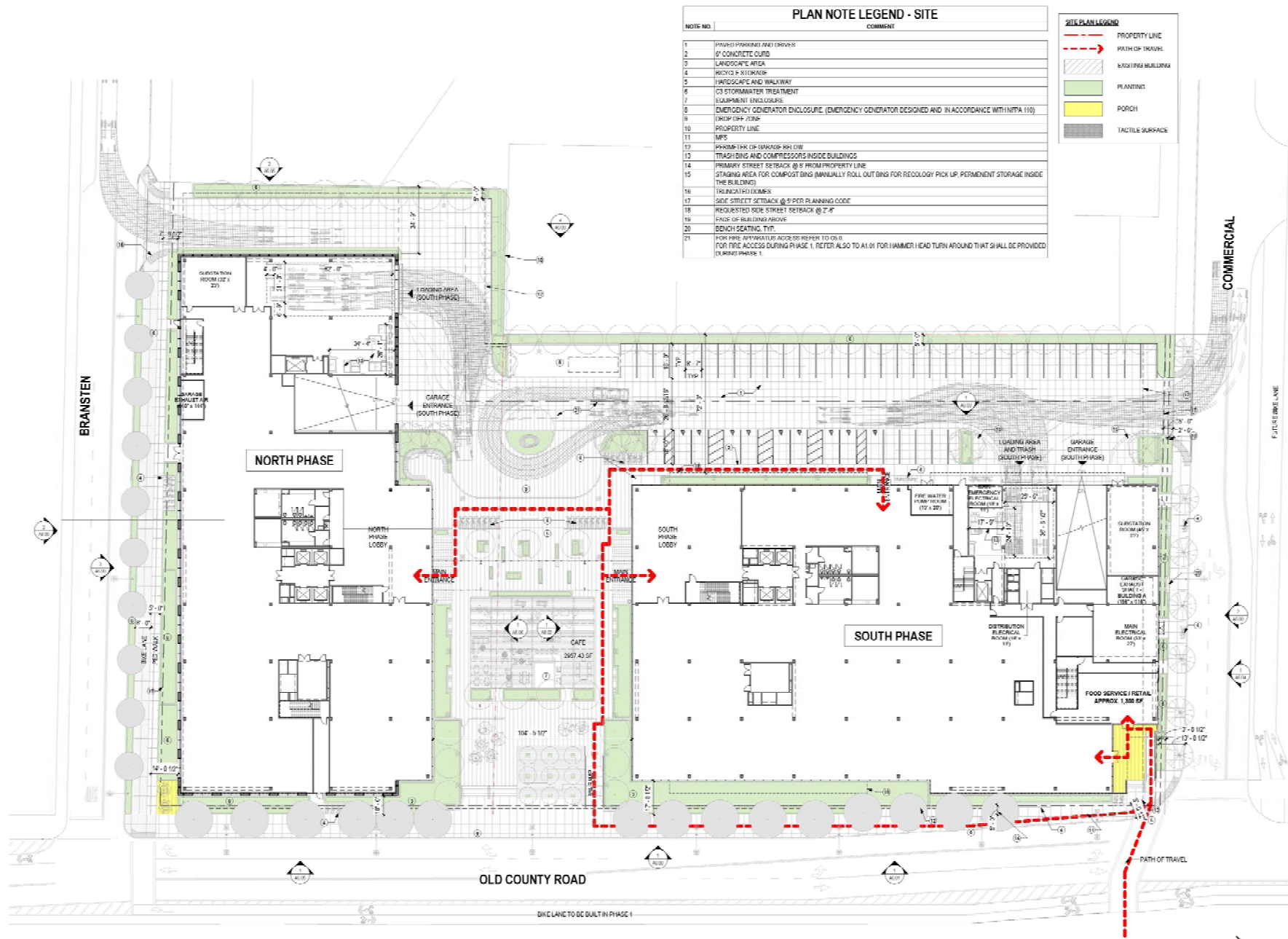
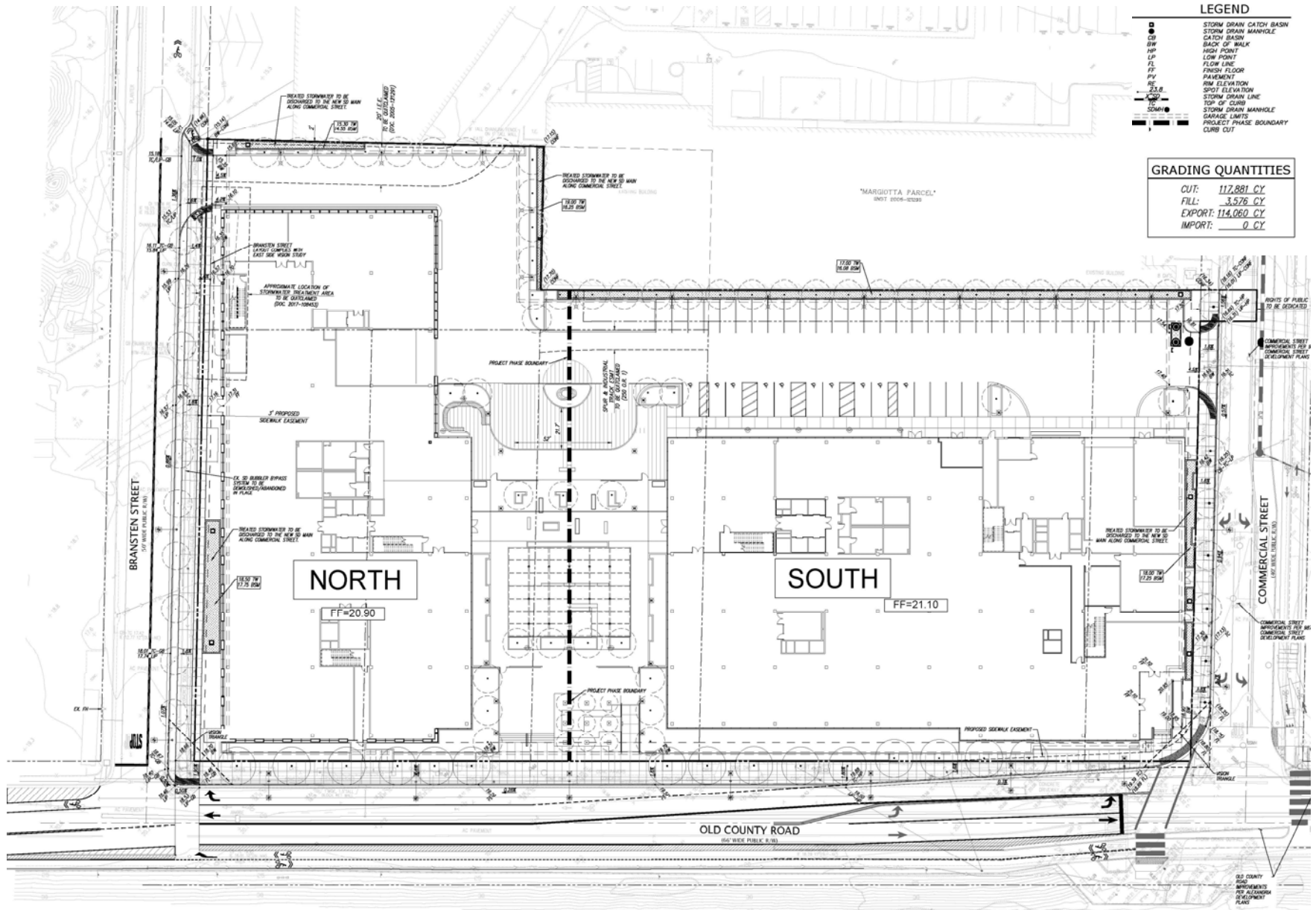


Figure 2: Project Site and Existing Conditions

Source: Google Earth, modified to show site





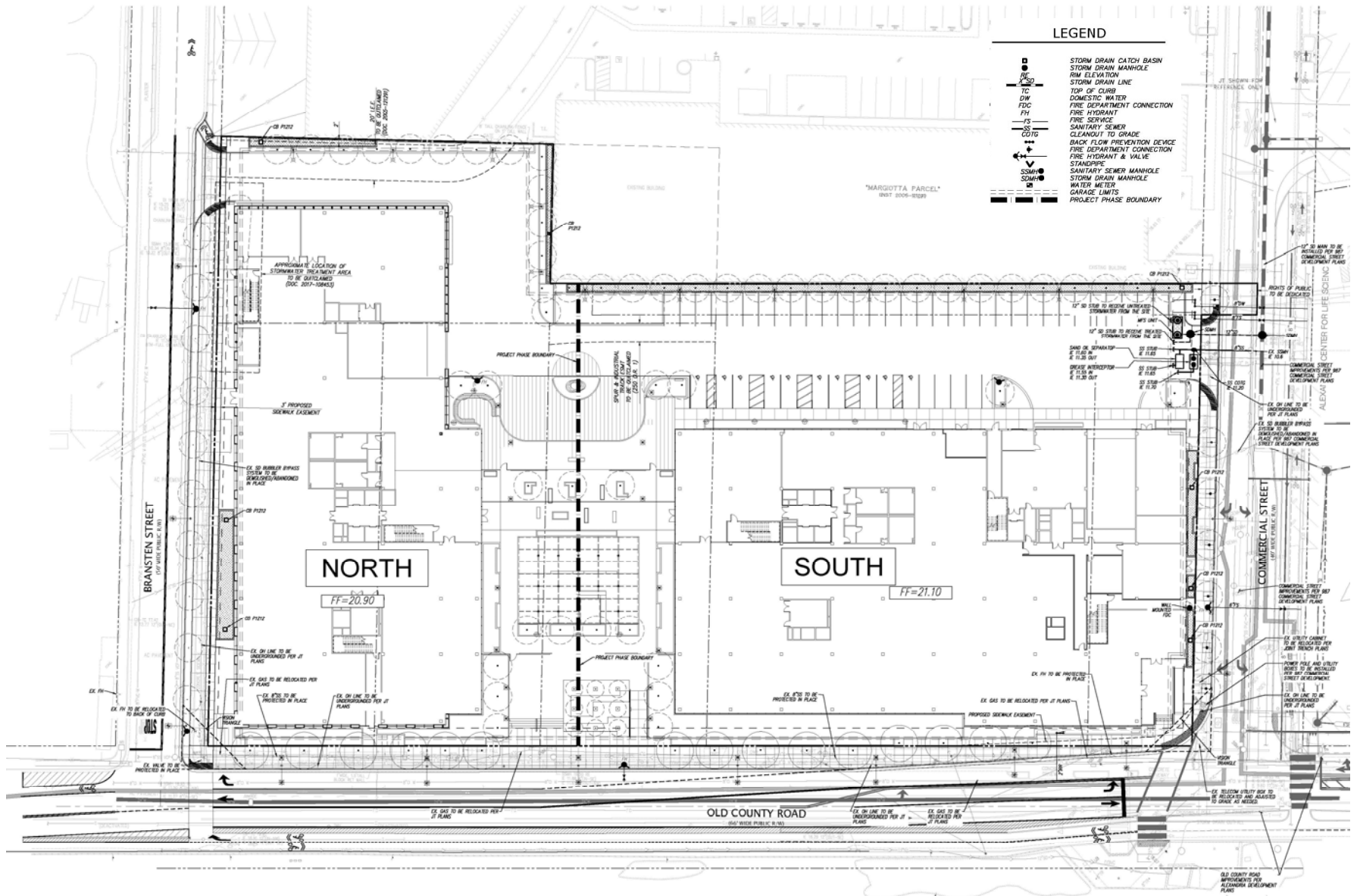


Figure 5: Utility Plan
 Source: Project Plan Set, dated January 11, 2023

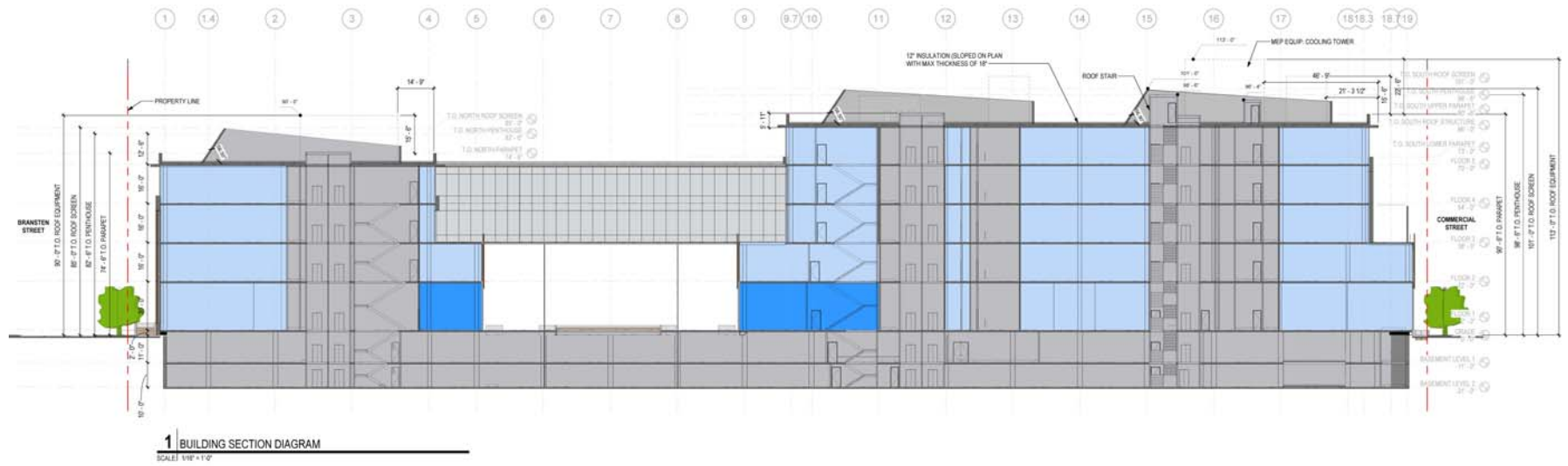


Figure 6: Building Section
 Source: Project Plan Set, dated January 11, 2023

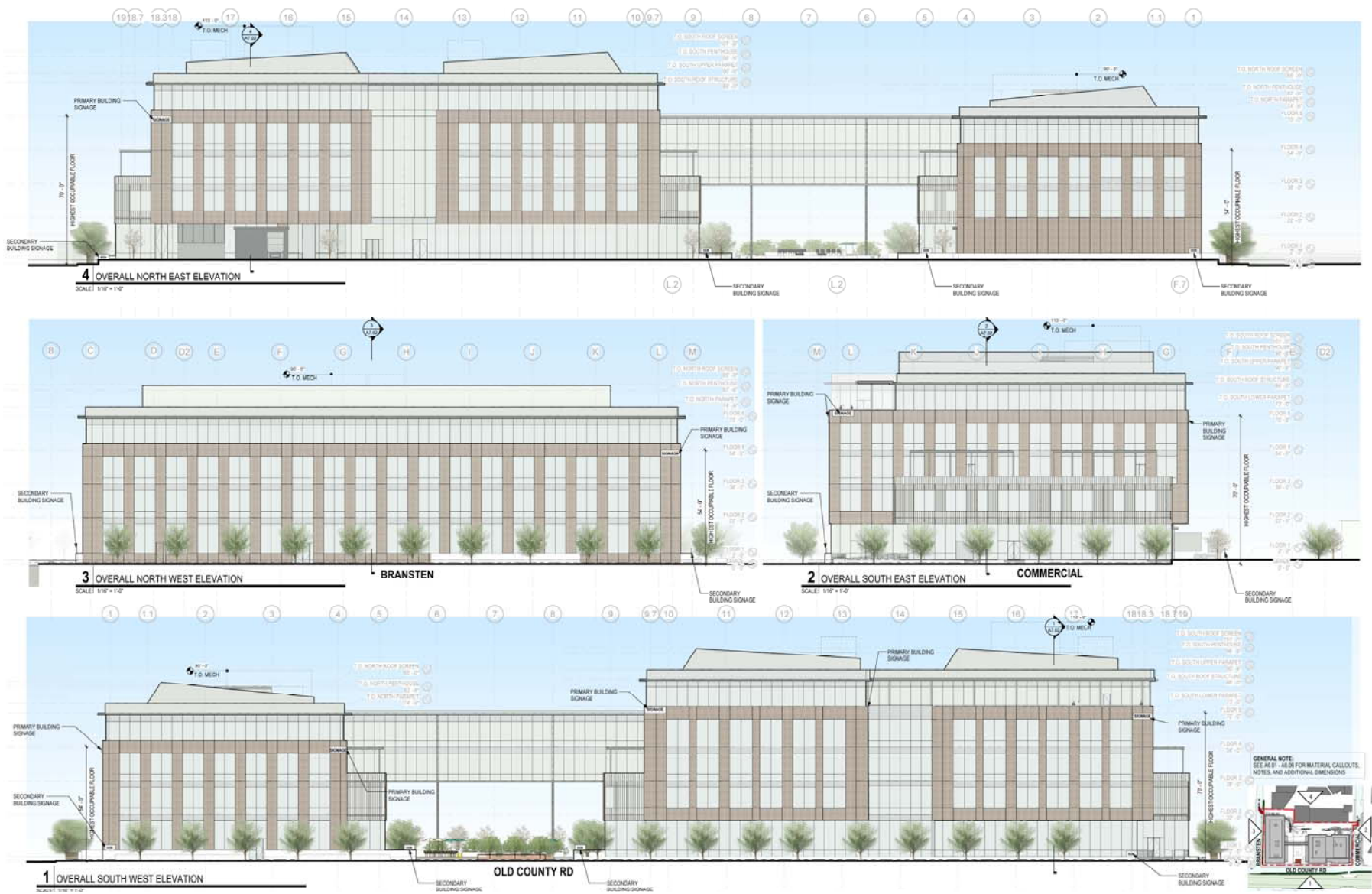


Figure 7: Building Elevations

Source: Project Plan Set, dated January 11, 2023



4 RENDER - COURTYARD VIEW2
SCALE: 1/2" = 1'-0"



2 RENDER - OLD COUNTY AND COMMERCIAL
SCALE: 1/2" = 1'-0"



3 RENDER - COURTYARD VIEW1
SCALE: 1/2" = 1'-0"



1 RENDER - EL CAMINO AERIAL
SCALE: 1/2" = 1'-0"



Figure 8: Project Renderings

Source: Project Plan Set, dated January 11, 2023

MITIGATED NEGATIVE DECLARATION

PROJECT DESCRIPTION, LOCATION, AND SETTING

This Mitigated Negative Declaration has been prepared for the 841 Old County Road project. See the Introduction and project Information section of this document for details of the project.

STANDARD CONDITIONS

There are regulations and policies applicable to the project that would be considered uniformly applied development policies or standards pursuant to CEQA Guidelines section 15183.3(7), or “Standard Conditions”. These Standard Conditions are incorporated into a project regardless of the project’s environmental determination and are therefore considered prior to determination of significance and are not considered mitigation under CEQA. The Standard Conditions in **Table 1** below would be applicable to the proposed project.

Table 1: Applicable Standard Conditions

Resource Area/Topic	Standard Condition
Aesthetics	Exterior Materials. Pursuant to San Carlos Municipal Code Chapter 18.29, the colors and materials of the structure and improvements shall be in substantial compliance with those presented and described within the application materials. Any changes determined to be significant as determined by the Community Development Director shall be reviewed and approved by the Planning Commission.
Aesthetics	Exterior Lighting Plan. Pursuant to San Carlos Municipal Code Chapter 18.29, a final exterior lighting plan with specifications in conformance with the approved plans is subject to review and approval by the Planning Division prior to Building Permit issuance.
Aesthetics	Signage. New signs are subject to compliance with San Carlos Municipal Code Chapter 18.22. No signs have yet been approved as part of this project. Any signs that are visible from U.S. Highway 101 shall require approval by the Planning Commission.
Biological Resources	Protection of Trees. Pursuant to San Carlos Municipal Code Sections 18.18.070 and 18.41.020, the project proponent shall obtain a permit to remove any tree(s) protected under the City’s Interim Protected Tree Ordinance, as determined by an arborist, and shall also prepare a tree protection plan that includes a map of the tree protection zone and is included in the construction drawings and bid package. Removed trees will be replaced in accordance with the ordinance at the discretion of the Community Development Director. If any removed trees are within the jurisdiction of California Department of Fish and Wildlife (CDFW), and CDFW issues a Lake and Streambed Agreement for the project, the tree replacement ratios shall comply with CDFW requirements.
Cultural and Tribal Cultural Resources	Protection of Human Remains. If human remains are unearthed during ground-disturbing activities, Section 7050.5(b) and (c) of the California Health and Safety code will be implemented. Section 7050.5(b) and (c) states:

Resource Area/Topic	Standard Condition
	<p>(b) In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.</p> <p>(c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. [In which case, section 5097.98 of the California Public Resources Code would apply.]</p>
Hydrology/ Water Quality	<p>Stormwater Control Plan. A stormwater and drainage control plan shall be prepared and implemented in compliance with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), Provision C.3 of the County’s Municipal Regional Stormwater NPDES Permit and any other required provisions of the City of San Carlos Municipal Code. The plan shall specify best management practices for the control and prevention of stormwater pollution. The plan shall address both construction-phase and post-construction pollutant impacts from development.</p> <p>Construction-phase measures shall include: erosion control measures such as installing fiber rolls, silt fences, gravel bags, or other erosion control devices around and/or downslope of work areas and around storm drains prior to earthwork and before the onset of any anticipated storm events; monitoring and maintaining all erosion and sediment control devices; designating a location away from storm drains when refueling or maintaining equipment; scheduling grading and excavation during dry weather; and removing vegetation only when absolutely necessary.</p> <p>Post-construction drainage controls shall be specified to capture and treat stormwater onsite.</p>
Geology and Soils	<p>Compliance with design-level Geotechnical Investigation and Structural Design Plans. Consistent with plan check procedures for Building Permit consideration, proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural</p>

Resource Area/Topic	Standard Condition
	engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.
Noise	Construction Noise. Construction Activities shall comply with the City’s noise ordinance (Chapter 9.30 of the San Carlo Municipal Code), which includes restriction of construction activities to the hours of 8:00 AM to 5:00 PM on weekdays, and 9:00 AM to 5:00 PM on Saturdays.
Transportation	<p>Transportation Demand Management (TDM). Pursuant to Chapter 18.25 of the City of San Carlos Municipal Code and San Mateo County Congestion Management Program Land Use Implementation Policy (C/CAG TDM Policy), a Transportation Demand Management Plan shall be implemented for the life of the project as presented to and approved by the Planning Commission. The owner and/or future tenants shall be responsible for supplying Planning Staff with the contact information for the Designated TDM Contact person.</p> <p>A report documenting the TDM activities undertaken and their results shall be submitted to the Community Development Director annually at the responsibility of the applicant. The Director may impose reasonable changes to assure the program’s objectives will be met. The owner and/or future tenants shall be responsible for ensuring that C/CAG TDM Policy requirements and monitoring and reporting are met.</p> <p>As new more efficient and effective TDM measures become available to reduce vehicle trips, these measures may be included or substituted to maintain the trip reduction levels described in the Plan. Any such substitutions shall be to the satisfaction of the Community Development Director. Any changes determined to be substantive or inconsistent with the TDM Plan by the Community Development Director shall require review and approval by the Planning Commission.</p> <p>[Note that if a Transportation Management Association (TMA) is established in San Carlos that can serve the project site, it is expected that the property owner shall participate in the TMA as fulfillment of TDM requirements. The level of financial contribution of the participants in the TMA shall be based on an equitable measure such as square footage (or similar metric) as agreed upon by the participants and the City.]</p>

POTENTIALLY SIGNIFICANT IMPACTS REQUIRING MITIGATION

The following is a list of potential project impacts and the mitigation measures recommended to reduce these impacts to a less than significant level. Refer to the Initial Study Checklist section of this document for a more detailed discussion.

Table 2: Project Impacts and Mitigation Measures

Potential Impact	Mitigation Measures
<p>Air Quality, Construction Emissions: Construction of the project would result in emissions and fugitive dust. While the project emissions would be below threshold levels, the Bay Area Air Quality Management District (BAAQMD) considers dust generated by grading and construction activities to be a significant impact associated with project development if uncontrolled and recommends implementation of construction management practices to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds.</p>	<p>Mitigation Measure Air-1: Basic Construction Management Practices. The project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD “Basic Construction Mitigation Measures”.</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.

Biological Resources, Nesting Birds: Trees in the vicinity of the project site could host the nests of common birds that are protected under the federal Migratory Bird Treaty Act and the California Fish and Wildlife Code, so the following mitigation would be applicable to prevent a “take” of these species under these regulations related to disturbance during nesting.

Mitigation Measure

Bio-1: Pre-Construction Nesting Bird Survey. Initiation of construction activities during the avian nesting season (February 15 through September 15) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 14 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place. The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The biologist may also determine that construction activities can be allowed within a buffer area with monitoring by the biologist to and stoppage of work in that area if adverse effects to the nests are observed. The buffer shall be maintained until after the nestlings have fledged and left the nest. These surveys would remain valid as long as construction activity is consistently occurring in a given area and would be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting season.

Cultural and Tribal Cultural Resources, Unknown Resources and Remains: There are no known cultural, tribal cultural, or paleontological resources at the site. However, given the moderate to high potential for unrecorded archeological resources and Native American resources and proposed disturbance of native soils which also have the potential to contain paleontological resources, mitigation measures Culture-1, Culture-2, and Culture-3 shall be implemented to address the potential for unexpected discovery of such resources.

Mitigation Measures

Culture-1: Further Site Assessment. Prior to ground disturbance, a qualified consultant shall conduct further archival and field study research to determine the appropriate locations for cultural or tribal cultural resource (historic/archaeological/paleontological/Native American) monitoring during removal of asphalt or concrete, fill, vegetation, or structures. Field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of buried archaeological resources.

Culture-2: Archaeological Sensitivity Training. In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance.

	<p>The training shall include suitable photographic materials showing the kinds of artifacts and evidence of prehistoric archaeological sites likely to be found in the area, as well as written and verbal descriptions for archaeological resources and signs of potential archaeological discovery. The training shall also include written materials describing what to do in the event of a discovery, or suspected discovery of archaeological resource.</p> <p>Culture-3: Protection of Accidentally Discovered Cultural Resources. In the event that any previously undiscovered cultural resource (historic/ archaeological/paleontological/Native American) are uncovered during ground disturbing activities, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in coordination with the City and in accordance with sections 21083.2 and/or 21084.1 of the California Public Resources Code</p>
<p>Geology and Soils, Site Characteristics and Excavation: The San Francisco Bay Area is a seismically active region, and the project includes construction activities require substantial excavation and dewatering. To mitigate the potential for damage to structures or people, the following measure shall be implemented:</p>	
	<p>Mitigation Measure</p> <p>Geo-1: Excavation Monitoring. The construction contractor shall implement a monitoring program to monitor the effects of the construction on nearby improvements, including the monitoring of cracking and vertical movement of adjacent structures, nearby streets, sidewalks, parking and other improvements. This shall include the installation of inclinometers or other instrumentation as part of the shoring system to closely monitor lateral movement at locations considered by the geotechnical engineer to be critical areas. The monitoring program shall be active from the beginning of excavation until the framing of the subterranean structure is complete and dewatering ceases.</p>
<p>Hazardous Materials, Site Remediation: The site is impacted by contamination from historic and adjacent uses, mostly due to the historic use of the site as a commercial fueling facility. The main contamination of concern is total petroleum hydrocarbons in the soil and groundwater. Removal of impacted soil is proposed as part of project construction activities and would be performed per requirements of the regulatory agency, the Regional Water Quality Control Board, as outlined in Haz-1.</p>	
	<p>Mitigation Measure</p> <p>Haz-1: Adherence to Remediation Measures. The applicant shall work with RWQCB to re-activate the fuel leak case and prepare and implement an agency approved remediation plan. The plan may include preparation of a Site Mitigation Plan to provide procedures and protocols for excavation, waste classification, and transportation/disposal of the contaminated soil; design of an excavation dewatering treatment system to manage the residual contamination in groundwater and excavation water generated during remediation and grading activities and potential off-site up-gradient considerations; evaluation and design, if needed, of a soil vapor barrier extension to the waterproofing system for some or all of the perimeter subterranean garage walls to mitigate chemically-affected soil vapor from</p>

	<p>migrating onto the project site; and further assessment of adjacent down-gradient properties, as required by the RWQCB, to evaluate conditions following completion of the on-site remediation and subgrade construction activities.</p>
<p>Hazardous Materials, Hazardous Building Materials: Because of the age of the existing buildings, there is the possibility for hazardous material from asbestos-containing materials and lead-based paint that could be released during demolition activities if not appropriately abated.</p>	
	<p>Mitigation Measure Haz-2: Lead-Based Paint and Asbestos Abatement. Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials and lead-based paint and that any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.</p>
<p>Noise and Vibration, Operational Noise: Because of the location of residences close to the project site, rooftop equipment has the potential to exceed noise ordinance levels and may need to be dampened.</p>	
	<p>Mitigation Measure Noise-1: Rooftop Mechanical Equipment Noise Assessment and Abatement. The applicant shall conduct a detailed mechanical noise analysis once rooftop equipment has been selected. If any equipment exceeds 87 dBA at 5 feet, the applicant shall provide silencers, barriers, or other noise mitigation treatments to reduce expected noise levels from the mechanical equipment to within the noise ordinance limits.</p>
<p>Noise and Vibration, Construction Vibration: Because of the proximity of adjacent buildings, there is the possibility for vibrations from construction equipment to damage their structures if not appropriately managed.</p>	
	<p>Mitigation Measure Noise-2: Construction Vibration Reduction and Monitoring. Construction Vibration Reduction and Monitoring. Wherever feasible, operation of vibratory rollers shall be avoided within 20 feet of existing buildings and operation of other construction equipment such as large bulldozers or loaded trucks shall be avoided within 10 feet of existing structures on adjacent lots. If vibratory rollers must operate within 20 feet of existing buildings or other major construction equipment must operate within 10 feet of existing buildings, then a vibration monitoring plan shall be prepared and implemented to monitor construction vibration at the nearest structures.</p>

LEAD AGENCY DETERMINATION

On the basis of this evaluation, it can be concluded that:

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

INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Environmental factors that may be affected by the project are listed alphabetically below. Factors marked with an “X” (☒) were determined to be potentially affected by the project, involving at least one impact that is a potentially significant impact as indicated by the Checklist on the following pages. Unmarked factors (☐) were determined to not be significantly affected by the project, based on discussion provided in the Checklist, including the application of mitigation measures.

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

There are no impacts that would remain significant with implementation of the identified mitigation measures.

EVALUATION OF ENVIRONMENTAL EFFECTS

The Checklist portion of the Initial Study begins below, with explanations of each CEQA issue topic. Four outcomes are possible, as explained below.

1. A “no impact” response indicates that no action that would have an adverse effect on the environment would occur due to the project.
2. A “less than significant” response indicates that while there may be potential for an environmental impact, there are standard procedures or regulations in place, or other features of the project as proposed, which would limit the extent of this impact to a level of “less than significant.”
3. Responses that indicate that the impact of the project would be “less than significant with mitigation” indicate that mitigation measures, identified in the subsequent discussion, will be required as a condition of project approval in order to effectively reduce potential project-related environmental effects to a level of “less than significant.”
4. A “potentially significant impact” response indicates that further analysis is required to determine the extent of the potential impact and identify any appropriate mitigation. If any topics are indicated with a “potentially significant impact,” these topics would need to be analyzed in an Environmental Impact Report.

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

Under CEQA Section 21099(d), “Aesthetic... impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.”

Accordingly, aesthetics is no longer considered in determining if a project has the potential to result in significant environmental effects for projects that meet all three of the following criteria:

1. The project is in a transit priority area. CEQA Section 21099(a)(7) defines a “transit priority area” as an area within one-half mile of an existing or planned major transit stop. A “major transit stop” is defined in CEQA Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the a.m. and p.m. peak commute periods.
2. The project is on an infill site. CEQA Section 21099(a)(4) defines an “infill site” as either (1) a lot within an urban area that was previously developed; or (2) a vacant site where at least 75 percent of the site perimeter adjoins (or is separated by only an improved public right-of-way from) parcels that are developed with qualified urban uses.
3. The project is residential, mixed-use residential, or an employment center. CEQA Section 21099(a)(1) defines an “employment center” as a project situated on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

The proposed project meets all three of the above criteria because the project (1) is in a transit priority area due to the location of the El Camino Real transit corridor (a major transit stop) and San Carlos

Caltrain Station within 0.5 miles from the project site; (2) is on an infill site that has been previously developed and is fully adjoined by urban uses and public rights-of-way within San Carlos; and (3) is an employment center with a projected FAR of 2.19. Thus, this section does not consider aesthetics, including the aesthetic impacts of light and glare, in determining the significance of project impacts under CEQA.

Nevertheless, the City recognizes that the public and decision makers may be interested in information about the aesthetic effects of a proposed project; therefore, the information contained in this section related to aesthetics, light, and glare is provided solely for informational purposes and is not used to determine the significance of environmental impacts pursuant to CEQA.

a) Scenic Vistas

The City has not officially designated any scenic vistas. However, San Carlos General Plan Land Use Element Policies LU-8.19 and LU-9.9 encourage development to minimize obstruction of scenic vistas from major public streets and open spaces, and design review pursuant to Sections 18.29.030 and 18.29.060 of the City's Municipal Code requires new development to respect existing public scenic vistas.

The project site and immediately surrounding areas are generally flat and do not afford substantial long-distance views across the site that could be considered scenic vistas. It is possible the project would change the character of some views from nearby commercial uses and could be visible in some mid-range views from the Greater East San Carlos neighborhood and views from more distant hillside residences, but these views would not qualify as scenic vistas or otherwise protected views nor are these uses from which views would necessarily be protected.

While the project proposes buildings that would be taller than the one-story buildings currently at the site and would be visible from more locations, the project would not substantially interfere with any public scenic vistas.

As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

b) Scenic Highways

There is no designated or eligible State Scenic Highway in the vicinity of the project nor is the project site adjacent to any scenic roadway identified in the City's General Plan.^{1, 2}

As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

¹ California Department of Transportation, State Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/scenic_hwy.htm

² City of San Carlos, *San Carlos 2030 General Plan*, pp.92-95.

c) Visual Character

The project site is currently developed with industrial uses, is zoned and designated for commercial and industrial development, and is surrounded by other sites with industrial/commercial zoning and development.

While the project would increase the height of development at the site (from one- and two- story buildings to four- and five-stories with rooftop projections), increased height would not of itself be considered necessarily negative or a substantial degradation under CEQA.

The project site, as well as the adjacent properties on the north, south, and east sides, are all marked by the City as redevelopment sites, and are being guided by the new East Side Innovation District Vision Plan. The design review process required by Section 18.116.130 of the Zoning Code requires architectural review for all new development in San Carlos prior to the issuance of a building permit. This review process ensures that all new development is aesthetically appropriate in scale and design, and that new buildings maintain the character of the surrounding district. Policy LU-6.6 of the General Plan encourages new development on the East Side to feature high quality architecture that reinforces the character of the area. As detailed in **Standard Condition: Exterior Materials**, included in Table 1, any significant changes to colors or materials used on the exterior of the project from those included in the application materials must be reviewed and approved by the Planning Commission. Also as included in Table 1, **Standard Condition: Signage**, any proposed signage must comply with Municipal Code Chapter 18.22, along with approval by the Planning Commission if the signage is visible from U.S. Highway 101.

As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant. Additionally, the City would review the proposed design as part of the approval process, which can include considerations beyond those strictly environmental-focused.

d) Light and Glare

Sources of light and glare in the project vicinity include interior and exterior building lights and light from parking lots. Light and glare associated with vehicular traffic along major thoroughfares in the area also create sources of glare. The existing level and sources of light and glare are typical of those in a developed urban setting.

Redevelopment of the project site has the potential to create additional light or glare. The project application is required to include a lighting plan and photometric plan as detailed in **Standard Condition: Exterior Lighting Plan**, included in Table 1, that demonstrates that the project would meet the City's standards that limit the amount of light that can spill over to other properties through the use of downcast lighting fixtures. With adherence to applicable regulations and policies, the project would have a less than significant impact on light and glare in San Carlos.

The project would result in development and lighting treatments typical of the existing commercial and industrial urban settings and consistent with lighting standards to minimize lighting on adjacent areas and would therefore not result in new sources of substantial adverse light or glare. As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

<p>2. AGRICULTURE AND FORESTRY RESOURCES</p> <p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				<input checked="" type="checkbox"/>

a-e) Agriculture and Forestry Resources

The project site is located in a developed urban area near a highway. No part of the site is zoned for or currently being used for agricultural or forestry purposes or is subject to the Williamson Act.³ There would be **no impact** to agricultural and forestry resources as a result of this project.

³ City of San Carlos, *San Carlos 2030 General Plan*, p.111.

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

This section utilizes information from the Air Quality & Greenhouse Gas Assessment prepared for this analysis by Illingworth & Rodkin, Inc. and dated May 6, 2022, included in full as Attachment A.

a) Air Quality Plan

Projects within San Carlos are subject to the Bay Area Clean Air Plan, first adopted by the Bay Area Air Quality Management District (BAAQMD) (in association with the Metropolitan Transportation Commission and the Association of Bay Area Governments) in 1991 to meet state requirements and those of the Federal Clean Air Act. The plan is meant to demonstrate progress toward meeting the ozone standards, but also includes other elements related to particulate matter, toxic air contaminants, and greenhouse gases. The latest update to the plan, adopted in April 2017, is the Bay Area 2017 Clean Air Plan.

BAAQMD recommends analyzing a project’s consistency with current air quality plan primary goals and control measures. The impact would be presumed significant if the project would conflict with or obstruct attainment of the primary goals or implementation of the control measures.

The primary goals of the Bay Area 2017 Clean Air Plan are:

- Attain all state and national air quality standards
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants
- Reduce Bay Area greenhouse gas emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050 (This standard is addressed in Section 8: Greenhouse Gas Emissions.)

The project would be required to comply with all applicable rules and regulations related to emissions and health risk and would not result in a new substantial source of emissions or toxic air contaminants (see items b-d below) or otherwise conflict with the primary goals of the 2017 Clean Air Plan.

The project would be consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4) and does not conflict with applicable control measures aimed at improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9) or any other control measures. The project is considered urban infill, would be located near employment centers, and would be located near transit with regional connections.

The project, therefore, would be consistent with the Clean Air Plan and have a *less than significant* impact in this regard.

b) Air Quality Standards/Criteria Pollutants

Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation and include ozone precursors including nitrogen oxides and reactive organic gasses (NO_x and ROG), carbon monoxide (CO), and suspended particulate matter (PM₁₀ and PM_{2.5}). The Bay Area is considered “attainment” for all of the national standards, with the exception of ozone. It is considered “nonattainment” for State standards for ozone and particulate matter.

Past, present, and future development projects contribute to the region’s adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulatively significant adverse air quality impacts.⁴

BAAQMD updated their Guidelines for air quality analysis in coordination with adoption of new thresholds of significance on June 2, 2010.⁵ The most recent version of the Guidelines is dated May 2017.

Project-related air quality impacts fall into two categories: short-term impacts that would occur during construction of the project and long-term impacts due to project operation. BAAQMD’s adopted thresholds are average daily emissions during construction or operation of 54 pounds per day or operational emissions of 10 tons per year of NO_x, ROG or PM_{2.5} and 82 pounds per day or 15 tons per year of PM₁₀.

⁴ BAAQMD, May 2017, California Environmental Quality Act Air Quality Guidelines, p. 2-1.

⁵ Bay Area Air Quality Management District. June 2, 2010. News Release [http://www.baaqmd.gov/~media/Files/Communications%20and%20Outreach/Publications/News%20Releases/2010/ceqa_100602.ashx](http://www.baaqmd.gov/~/media/Files/Communications%20and%20Outreach/Publications/News%20Releases/2010/ceqa_100602.ashx).

Construction and operational emissions for the project were modeled using the California Emissions Estimator Model (“CalEEMod”) version 2020.4.0. Project details were entered into the model including the proposed land uses, Transportation Demand Management Plan trip reductions, Peninsula Clean Energy carbon intensity factors, demolition/earthwork volumes, and construction schedule. Model defaults were otherwise used. The CARB Emission FACTors 2021 (EMFAC2021) model was used to predict emissions from construction traffic, which includes worker travel, vendor trucks, and haul trucks. The CalEEMod inputs and results and EMFAC inputs are included in Attachment A.

Construction Emissions

Construction of the project would involve demolition, excavation, site preparation, building erection, paving, and finishing and landscaping. Although these construction activities would be temporary, they would have the potential to cause both nuisance and health-related air quality impacts.

BAAQMD’s adopted thresholds are average daily emissions during construction of 54 pounds per day of NOx, ROG or PM_{2.5} and 82 pounds per day of PM₁₀.

The results from emissions modeling for construction are summarized in **Table 3** (and included in full in Attachment A).

Table 3: Regional Air Pollutant Emissions for Construction

Description	ROG	NOx	PM10 ¹	PM2.5 ¹
Average Daily Emissions (lbs/day)	14	16	<1	<1
BAAQMD Daily Thresholds (lbs/day)	54	54	82	54
<i>Exceeds Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

¹Applies to exhaust emissions only
Source: Illingworth & Rodkin 2021, Table 4 in Attachment A.

Construction-period emissions levels are below BAAQMD thresholds presented in Table 3. However, BAAQMD considers dust generated by grading and construction activities to be a significant impact associated with project development if uncontrolled and recommends implementation of construction mitigation measures to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds. These basic construction management practices are included in Mitigation Measure Air-1, below and would further reduce construction-period criteria pollutant impacts.

Mitigation Measure

Air-1: Basic Construction Management Practices. The project applicant/owner/sponsor shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD “Basic Construction Mitigation Measures”.

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

With implementation of Mitigation Measure Air-1, the impact related to construction-period criteria pollutant impacts would be ***less than significant with mitigation***. Because construction-period emissions would not exceed applicable significance thresholds, additional construction mitigation measures would not be required to mitigate impacts.

Operational Emissions

Emissions from operation of the project could cumulatively contribute to air pollutant levels in the region. These air pollutants include ROG and NO_x that affect ozone levels (and to some degree – particulate levels), PM₁₀, and PM_{2.5}.

BAAQMD's adopted thresholds are emissions during operations of 54 pounds per day or 10 tons per year of NO_x, ROG or PM_{2.5} and 82 pounds per day or 15 tons per year of PM₁₀. Emissions of air pollutants associated with the project were predicted using CalEEMod. This model predicts daily emissions associated with development projects by combining predicted daily traffic activity, including reductions for existing uses and the required Transportation Demand Management (TDM) plan (see Section 17, Transportation and Attachment E), associated with the different land use types, with emission factors from the State's mobile emission factor model (i.e., EMFAC2021). Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest full year of operation would be 2025 if construction begins in 2023. Other sources of operational emissions include two stand-by

emergency diesel generators, a cooling tower, water/wastewater use, and solid waste generation. While the project would start with only one generator, the plans include room for a second generator that could be installed by future tenants, so modeling included two generators. The building would be all electric, so no natural gas input was included.

Daily and annual operational air emissions predicted with build-out of the proposed project are reported in **Table 4** and compared against BAAQMD thresholds.

Table 4: Regional Air Pollutant Emissions for Operational Period

Description	ROG	NOx	PM10	PM2.5
Project Annual Emissions (tons/year)	2.54	1.15	2.43	0.63
Existing Use Emissions (tons/year)	0.57	0.48	0.71	0.18
Net Total Operational Emissions (tons/year)	1.96	0.66	1.73	0.45
BAAQMD Thresholds (tons/year)	10	10	15	10
<i>Exceeds Annual Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Net Daily Operational Emissions (lbs/day)	10.77	3.63	9.47	2.45
BAAQMD Thresholds (lbs/day)	54	54	82	54
<i>Exceeds Daily Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Illingworth & Rodkin, 2022, Table 5 in Attachment A.

As shown in Table 4, project annual and daily emissions are below relevant significance thresholds established by BAAQMD for operational air pollutant emissions.

As vehicular emissions have improved over the years, carbon monoxide hotspots have become less of a concern. BAAQMD presents traffic-based criteria as screening criteria for carbon monoxide impacts, as follows.⁶ The project would implement a Transportation Demand Management Program per San Carlos Municipal Code to reduce project trips. The project is therefore consistent with the Congestion Management Plan (CMP) of the San Mateo City/County Association of Governments (C/CAG), which is the first threshold. The other two screening thresholds are whether the project would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (such as a tunnel or underground parking garage). These hourly traffic volumes are very high and much higher than those in the vicinity. For example, El Camino Real is one of the highest volume roadways in the vicinity and is projected to carry approximately 35,000 vehicles *per day*. Spread over a day, that would be substantially fewer than 44,000 vehicles *per hour*. The project's underground parking garage would serve only project vehicles with expected parking for 745 vehicles, which is again substantially fewer than the threshold of 24,000 vehicles per hour. Therefore, conditions in and around the project would be well below screening levels and the project would not result in individually or cumulatively significant impacts from CO emissions.

⁶ Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, p. 3-2, 3-3.

The project is below significance thresholds established by BAAQMD and meets localized CO screening criteria. As a result, the project would have a **less than significant** impact on regional air quality during the operational period.

c) Sensitive Receptors

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, a number of urban or industrialized communities exist where the exposure to TACs is relatively high compared to other communities. According to the BAAQMD CEQA Guidelines, the project site is not in an impacted community.⁷

BAAQMD's adopted thresholds for the purpose of assessing impacts of a proposed project on exposure of sensitive receptors to risks and hazards in an area that is not an identified impacted community are a project-specific cancer risk exceeding 10 in one million (or cumulative risk of 100 in one million), a non-cancer risk exceeding a Hazard Index of 1.0 (or a cumulative Hazard Index of 10.0), and/or the annual average PM_{2.5} concentration exceeding 0.3 µg/m³ (or 0.8 µg/m³ cumulatively).

Certain population groups, such as children, the elderly, and people with health problems, can be particularly sensitive to air pollution. With respect to air pollutants, examples of sensitive receptors include health care facilities, retirement homes, school and playground facilities, and residential areas. The project itself is not considered a sensitive receptor. The closest sensitive receptors to the project site are the residences to the south, west, and north, as well as The Children's Place Preschool and Little Learners Preschool, all located about 500 feet or more from the project site. Risks are reported for the maximally exposed individual, which is the sensitive receptor identified as the most impacted. Age sensitivity factors are applied to address increased risks depending on age.

A community health risk assessment was performed using the recommended EPA dispersion model AERMOD to factor in receptor locations and meteorological conditions as included in full in Attachment A and summarized below.

Construction activity that uses traditional diesel-powered equipment results in the emission of diesel particulate matter including fine particulate matter, which is considered a TAC. The generation of these emissions would be temporary, confined to the construction-period, and are factored into the community risk prior to the operational period. Construction-period and operational risk are shown in **Table 5**.

Operational emissions from the proposed emergency generators and cooling tower would also contribute to community risk. The project proposes to include one stand-by emergency diesel generator located on the northeastern boundary of the property to power both buildings in the event of a power failure. The project also proposes to leave room for a second generator to be installed by the tenant. Diesel emergency generators emit DPM and are subject to BAAQMD permitting. Other than under emergency conditions, emergency generators would be operated primarily for testing and maintenance purposes, which is typically less than 1 hour at a time, and would be limited under BAAQMD permitting to a total of up to 50 hours per year. The project also proposes a cooling tower on the roof of the proposed southern building. A cooling tower is an air-conditioning system that uses water and air as heat exchangers to cool a building. Particulate matter

⁷ Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, Figure 5-1.

emissions from such evaporative cooling can occur because emitted water droplets can contain dissolved solids that can become small particulate matter (i.e., PM10 and PM2.5) emissions. The cooling towers are not powered by a diesel engine, so no DPM emissions would be produced.

Table 5: Construction and Operation Risk (Unmitigated)

Source	Cancer Risk (per million)	Annual PM25 (µg/m3)	Hazard Index
Project Construction (Years 0-4)	4.10	0.02	<0.01
Project Generator Operation (Years 4-30)	0.11	0.01	<0.01
Project Cooling Towers (Years 4-30)	--	<0.01	--
Total/Maximum Project Risk, Unmitigated	4.21	0.02	<0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
<i>Exceed Threshold?</i>	No	No	No

Source: Illingworth & Rodkin, 2022, Table 6 in Attachment A.

As shown in Table 5, construction-period project health risks combined with operational period health risks to off-site sensitive receptors would not exceed project-specific threshold levels.

While specific tenants have not yet been identified, this type of project is also likely to include research laboratories with fume hoods. Laboratory fume hoods would be required to employ appropriate exhaust systems to control any emission of air pollutants. Emissions of air pollutants or TACs are subject to BAAQMD permitting requirements that would require the District to apply all applicable rules and regulations to limit or control these emissions. Regulation 2, Rule 1: General Requirements, and Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants would apply to any potential emissions from these sources. The District’s risk policy is to not issue a permit to any source that would cause a cancer risk of greater than 10 chances per million. Therefore, although the specifics of the laboratory and fume hood emissions is not quantifiable at this time, the quantities that would be emitted would by regulation remain below applicable threshold levels and the project-specific community health impact would be ***less than significant***.

Community health risk assessments typically also look at all substantial sources of TACs located within 1,000 feet of the project site (i.e., influence area). These sources can include railroads, freeways or highways, high-volume surface streets, and stationary sources permitted by BAAQMD.

The project vicinity includes three high volume roadways with average daily traffic (ADT) above 10,000 (El Camino Real, Old County Road and Commercial Steet), Caltrain and freight rail, seven stationary sources of air pollution, and the site of the proposed Alexander Center for Life Science (ACLS), which would be anticipated to undergo simultaneous construction with this project and introduce an additional twelve stationary sources in the form of emergency generators. Therefore, an additional cumulative community risk analysis is warranted. The cumulative cancer risk, hazard index, and annual PM_{2.5} concentrations are summarized in **Table 6**.

Table 6: Cumulative Community Risk (Unmitigated)

Source	Cancer Risk (per million)	Annual PM25 ($\mu\text{g}/\text{m}^3$)	Hazard Index
Total/Maximum Project Risk (Years 0-30)	4.21	0.02	<0.01
<i>Additional Cumulative Sources</i>			
El Camino Real, ADT 35,086	4.43	0.28	<0.01
Old County Road, ADT 34,472	3.42	0.13	<0.01
Commercial Street, ADT 34,472	1.31	0.04	<0.01
Caltrain and freight rail	28.80	0.06	<0.01
ACLS project generators	<0.01	<0.01	<0.01
ACLS project Construction Emissions	7.03	0.19	<0.03
CEMEX concrete manufacturing (facility ID #2939)	0.36	0.67	0.01
Other stationary sources	<2.21	<0.04	<0.06
All Cumulative Sources	<51.78	<1.44	<0.16
BAAQMD Cumulative Source Threshold	100	0.8	10.0
<i>Exceed Threshold?</i>	<i>No</i>	Yes	<i>No</i>

Notes: Risks in this table are reported for the maximally exposed individual, factoring in age-sensitivity.

Source: Illingworth & Rodkin, 2022, Table 7 in Attachment A

As shown in Table 6, the cumulative source threshold for PM_{2.5} is exceeded for the maximally exposed individual due largely to proximity to the CEMEX facility, which represent 47% of the cumulative PM_{2.5} volumes. However, because the project-specific risk would not exceed the single source thresholds, contributing approximately 1.4% of the total cumulative PM_{2.5} level, per BAAQMD guidance, the project would not be considered to have a cumulatively considerable contribution to this impact. It can also be noted that during the course of analysis of this project, a proposal has been submitted to the City to remove the CEMEX facility and redevelop the site with office/R&D uses, which would lower cumulative risk. Therefore, the project's impact related to exposure of sensitive receptors would be ***less than significant***.

d) Other Emissions

Odors from construction activities are associated with construction equipment exhaust and the application of asphalt and architectural coatings. Odors emitted from construction activities would be temporary and not likely to be noticeable much beyond a project site's boundaries. The proposed office/R&D use is consistent with the type of development in the area and is not a use type considered by BAAQMD to be a source of substantial objectionable odors.⁸ Therefore, the potential for objectionable odor impacts to adversely affect a substantial number of people is ***less than significant***.

⁸ Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, Table 3-3.

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

a, b) Special Status Species and Habitat. The project site consists entirely of developed land and has been under industrial or commercial usage for many decades. It is situated within an urbanized area and is surrounded on all sides by commercial or transportation uses. As would be expected for a project in such conditions, the General Plan EIR identified no biological habitat or occurrences of sensitive species on or adjacent to the project site.⁹ The site and its vicinity have little or no habitat value and would not have a substantial adverse effect, either directly or through habitat modifications, on special status species, except for possibly migrating birds, as discussed below.

That being said, the federal Migratory Bird Treaty Act and Fish and Game Code of California protect special-status bird species year-round, as well as their eggs and nests during the nesting season.

⁹ City of San Carlos, *San Carlos 2030 General Plan EIR*, June 2009, Chapter 4.3: Biological Resources.

The list of migratory birds includes almost every native bird in the United States. On-site or adjacent trees could be used by protected birds. Construction activities could adversely affect nesting birds protected by the Migratory Bird Treaty Act and/or Fish and Game Code of California.

Mitigation Measure

Bio-1: Pre-Construction Nesting Bird Survey. Initiation of construction activities during the avian nesting season (February 15 through September 15) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 14 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place. The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The biologist may also determine that construction activities can be allowed within a buffer area with monitoring by the biologist to and stoppage of work in that area if adverse effects to the nests are observed. The buffer shall be maintained until after the nestlings have fledged and left the nest. These surveys would remain valid as long as construction activity is consistently occurring in a given area and would be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting season.

With implementation of mitigation measure Bio-1, which requires avoidance of nesting season or a nesting survey and buffers from any nests as appropriate, the impact related to special-status and non-status bird species would be *less than significant with mitigation*.

c, d) Wetlands and Wildlife Corridors

The proposed project site is currently developed and does not contain wetland areas. It is an urban area that does not have the potential to be used as a significant wildlife corridor. The project has *no impact* on wetlands and wildlife corridors.

e) Local Policies and Ordinances

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that covers the project site. The project would have a significant environmental impact if it were to conflict with any local policies or ordinances protecting biological resources. San Carlos Municipal Code Sections 18.18.070 and 18.41.020 related to protected trees are applicable to the site, as detailed in **Standard Condition: Protection of Trees**, included in Table 1.

The San Carlos Municipal Code sets forth regulations for “protected trees” which are defined as “heritage” or “significant” trees. Removal of any protected tree requires approval by the Community Development Director. In granting a tree removal permit, the Director may attach reasonable conditions to ensure compliance with the content and purpose of this chapter, such as,

but not limited to, requiring replacement of trees removed with plantings acceptable to the Director.

There are currently 6 trees on the project site, with 4 street trees located along Bransten Road and two within the parking lot/landscape area, all of which would be removed during demolition activities. These include 4 Bradford pear trees (*Pyrus calleryana* 'Bradford') and two Mexican fan palms (*Washingtonia robusta*). Based on trunk size, 4 of the trees would be considered protected trees under the City's Municipal Code and would require appropriate approval for removal. A total of 112 new trees are proposed to be planted on site as part of the proposed development.

The removal of the trees at the site would not intrinsically be considered an environmental impact because the trees proposed for removal are neither endangered nor special-status from a state and federal biological standpoint, and implementation of requirements in Standard Condition: Protection of Trees would ensure consistency with applicable plans and policies. Therefore, the impacts related to local biological policy conflicts would be ***less than significant***.

f) Conservation Plans

There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that cover the project site. There would be ***no impact*** related to conflict with conservation plans.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Public Resources Section 15064.5?			<input checked="" type="checkbox"/>	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Section 15064.5?		<input checked="" type="checkbox"/>		
c) Disturb any human remains, including those interred outside of formal cemeteries?			<input checked="" type="checkbox"/>	

This section utilizes information from the Historic Resource Evaluation prepared for this analysis by Preservation Architecture, and dated March 15, 2022, included in full in Attachment B.

a) Historic Resources

Portions of the existing structures were built in 1977 and 1978, so do not qualify as historic by age (50+ years is considered historic-age). According to the Historic Resource Evaluation (Attachment B), the remaining structures are without historical design or construction distinction. No detailed evidence of the buildings' origins was able to be located, and no original architects or engineers were identifiable. While associated by proximity and by their mid-20th century building supply uses, which were common in this locale in that period, the properties and buildings have no design or construction relationships. They were not unified by shared ownership or users, nor have any important persons been identified as individually associated with these properties and buildings. Additionally, the subject parcels and their buildings are not directly associated with any events of historic significance because no individual discoveries, innovations or inventions of importance are identifiably associated. Based on these findings, the existing structures would not be considered significant historic resources under CEQA and the project would have a **less than significant impact** on historic resources.

b) Archaeological Resources

The project site has been previously developed and is predominantly covered by paving and structures.

There are only a few known archaeological sites in the city, located primarily near the banks of Cordilleras and Pulgas Creeks (located over 500 feet from the project site).¹⁰ A records search of the Northwest Information Center (included in Attachment B) confirmed the lack of recorded resources at the project site. However, due to the project site location and characteristics of the area, the

¹⁰ City of San Carlos, Adopted October 2009, 2030 General Plan, Land Use Element, p. 76.

potential for discovery of unrecorded historic-period archaeological resources or Native American archaeological resources are considered moderate and moderate to high respectively. Native American resources are discussed further in the Section 18, Tribal Cultural Resources.

Given the moderately high potential for unrecorded archeological resources and Native American resources, mitigation measures Culture-1, Culture-2, and Culture-3 shall be implemented.

Mitigation Measures

Culture-1: Further Site Assessment. Prior to ground disturbance, a qualified consultant shall conduct further archival and field study research to determine the appropriate locations for cultural or tribal cultural resource (historic / archaeological / paleontological / Native American) monitoring during removal of asphalt or concrete, fill, vegetation, or structures. Field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of buried archaeological resources.

Culture-2: Archaeological Sensitivity Training. In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance.

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

Culture-3: Protection of Accidentally Discovered Cultural Resources. In the event that any previously undiscovered cultural resource (historic/archaeological/paleontological/Native American) are uncovered during ground disturbing activities, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in coordination with the City and in accordance with sections 21083.2 and/or 21084.1 of the California Public Resources Code.

Implementation of requirements in Standard Condition: Protection of Human Remains and Mitigation Measures Culture-1, Culture-2, and Culture-3 would reduce the impacts associated with possible disturbance of unidentified cultural resources at the project site to a level of ***less than significant with mitigation***.

c) Human Remains

There are no known human remains that would be disturbed by the proposed project. If human remains are found during construction activities at the project site, they would be handled according to relevant regulations as detailed in **Standard Condition: Protection of Human Remains**, included in Table 1. Therefore, the impacts related to human remains would be ***less than significant***.

<p>6. ENERGY</p> <p>Would the project:</p>	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			☒	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			☒	

a, b) Energy

The threshold of significance related to energy use is whether the project would result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct state or local plans for renewable energy or energy efficiency.

The project would include short-term demolition and construction activities that would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment), gasoline (e.g., vehicle trips by construction workers), and electricity (e.g., power tools). Energy would also be used for conveyance of water used in dust control, transportation and disposal of construction waste, and energy used in production and transport of construction materials.

During operation, energy demand from the project would include fuel consumed by employee and delivery vehicles, and electricity consumed by the proposed structures, including lighting, research equipment, water conveyance, heating and air conditioning.

Energy usage for the project was calculated based on energy usage and vehicle miles travelled information from the emissions modeling and is included in full in Attachment C. **Table 7** shows a summary of the project’s estimated total construction energy consumption and annual operational energy consumption.

As shown in **Table 7**, project construction would require what equates to 26,712 MMBtu¹¹ of energy use. The project would implement construction management practices per mitigation measure Air-1 (See Air Quality Section). While focused on emissions and dust reduction, the construction management practices would also reduce energy consumption through anti-idling measures and proper maintenance of equipment. The project would comply with the 2019 requirements of the California Green Building Standards Code (CALGreen) to divert a minimum of 65 percent of construction and demolition debris. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the project’s construction energy consumption.

¹¹ MMBtu stands for Metric Million British Thermal Unit. For comparison purposes in this analysis, all forms of energy usage have been converted to MMBtu even though different types of energy would originally be measured in different units. See the energy Calculations in Attachment C for additional details.

Table 7: Construction and Operational Energy Usage

Source	Energy Consumption	
	Amount and Units	Converted to MMBtu
<i>Construction Energy Use (Total)</i>		
Construction Worker Vehicle Trips (Gasoline)	51,301 gallons	5,632 MMBtu
Construction Equipment and Vendor/Hauling Trips (Diesel)	153,439 gallons	21,080 MMBtu
<i>Total Construction Energy Use</i>		<i>26,712 MMBtu</i>
<i>Operational Vehicle Fuel Use (Gross Annual)</i>		
Gasoline	202,787 gallons	22,263 MMBtu
Diesel	41,447 gallons	5,694 MMBtu
<i>Operational Built Environment (Gross Annual)</i>		
Electricity	4.15 GWh	14,167 MMBtu
Natural Gas Usage	0 kBtu	0 MMBtu
<i>Total Gross Annual Operational Energy Use</i>		<i>42,124 MMBtu</i>

Note: The energy use reported in this table is gross operational energy use for the proposed project with no reduction to account for energy use of existing uses.

Source: Energy Calculations included as Attachment C

As also shown in Table 7, project annual energy consumption would equate to 42,124 MMBtu of energy use. Consistent with the City’s Reach Code, the project has proposed all-electric construction with no gas connections. The project’s required TDM plan (see Section 17, Transportation) will also include various measures designed to reduce total vehicle trips.

When subtracting existing operational fuel and built environment energy use from the project totals above, the total net increase in annual operational energy use would be 33,178 MMBtu (see Attachment C for additional detail).

As detailed in Section 17: Transportation, with implementation of the required TDM Plan, the project would result in low levels of vehicle travel relative to regional averages and would help meet regional efforts to reduce vehicle travel and therefore related vehicular consumption of fuel energy.

As detailed in Section 3: Air Quality and Section 8: Greenhouse Gas Emissions, the project is also consistent with regional and local climate actions plans. The project incorporates energy and energy-related efficiency measures meeting all applicable requirements, including water and waste efficiency. The project would be required to comply with all standards of the City’s Reach Code, Title 24 of the California Code of Regulations, and CALGreen, as applicable, aimed at the incorporation of energy-conserving design and construction.

While representing a change from the former uses at the site, the project is consistent with the type of development in the area and allowed under the land use designation and zoning.

Therefore, although the project would incrementally increase energy consumption, it would not result in a significant impact related to energy consumption in a wasteful, inefficient, or unnecessary manner or otherwise conflict with energy plans and the impact in this regard would be ***less than significant***.

7. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: <ul style="list-style-type: none"> i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42) ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides? 			<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?			<input checked="" type="checkbox"/>	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		<input checked="" type="checkbox"/>		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			<input checked="" type="checkbox"/>	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		<input checked="" type="checkbox"/>		

This section utilizes information from the Design-Level Geotechnical Investigation prepared for the applicants by Cornerstone Earth Group, dated July 16, 2021, which is available as part of the project application materials.

a, c, d) Geologic Hazards

There are no faults traces across the site and therefore, fault rupture hazard is not a significant impact. However, the San Francisco Bay Area is a seismically active region, and the site is likely to encounter strong seismic ground shaking during the lifetime of the project.

Landslides are downward and outward movements of slope-forming materials such as rock, soil, and artificial fill. Landslides occur on some of the upper hilly slopes, more commonly in the western area of the city. There are no hillsides near the project site and therefore would be no impact resulting from landslides.

The project site is underlain with 1.5 to 11 feet of highly variable undocumented fill consisting of generally medium stiff sandy lean clays and dense to very dense clayey sands with variable amounts of gravel. Beneath the fill is variable including hard sandy lean clay followed by medium dense clayey sand or very dense poorly graded sand with silty, medium stiff to very stiff lean clays with varying amounts of sand and medium dense clayey sands with gravel. Below these layers the site is generally underlain by deep alluvial soils consisting of medium stiff to very stiff clays interbedded with occasional layers of medium dense to dense sands. Given the characteristics of the soils, the site was concluded to have the following characteristics:

- moderate to high expansion potential to wetting and drying cycles,
- high potential for liquefaction that could result in total settlement of ½ inch or less
- low potentially for lateral spreading to affect the site
- low potential for significant differential seismic settlement affecting the proposed structures.

The geotechnical analysis concluded that the potential geological hazards can be addressed through proposed excavation and appropriate design and construction, which would occur as part of the standard design-level geotechnical recommendations and structural plans as specified in Standard Conditions: Compliance with design-level Geotechnical Investigation and Structural Design Plans, as included in Table 1.

Due to the extent of the proposed excavation for below grade parking, the Geotechnical Investigation identified a significant potential to affect nearby private structures and parking areas and/or public sidewalks and roadways outside of the project site during excavation and dewatering, which may include cracking or vertical movement. In addition to implementation of the Standard Condition above requiring conformance with design-level geotechnical recommendations, the following mitigation measure would reduce the risk of damage to nearby improvements due to the potential for ground instability during construction activities at the site.

Mitigation Measure

Geo-1: Excavation Monitoring. The construction contractor shall implement a monitoring program to monitor the effects of the construction on nearby improvements, including the monitoring of cracking and vertical movement of adjacent structures, nearby streets, sidewalks, parking and other improvements. This shall include the installation of inclinometers or other instrumentation as part of the shoring system to closely monitor lateral movement at locations considered by the geotechnical engineer to be critical areas. The monitoring program shall be active from the beginning of excavation until the framing of the subterranean structure is complete and dewatering ceases.

Implementation of mitigation measure Geo-1 and Standard Condition: Compliance with design-level Geotechnical Investigation and Structural Design Plans would reduce the effects of geologic hazards caused by seismic activities and expansive or unstable soils to ***less than significant with mitigation.***

b) Soil Erosion

The project would be subject to a National Pollution Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB). The construction contractors would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and an Erosion Control Plan. The SWPPP must describe the site, the project, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, control of post-construction sediment and erosion control measures, maintenance responsibilities, and management controls. All construction activities would be required to comply with Chapters 18 and 33 and Appendix J of the City Building Code, which regulate excavation activities, the construction of foundations and retaining walls, and grading activities, including drainage and erosion control. Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. With required implementation of a SWPPP and Erosion Control Plan to prevent erosion, sedimentation, and loss of topsoil during and following construction, the soil erosion impacts of the project would be ***less than significant***.

e) Septic Tanks

The project would not include the use of septic tanks and associated disposal facilities. Therefore, the project would have ***no impact*** in this regard.

f) Unique Geologic Feature or Paleontological Resource

The site is generally flat and currently developed and there are no unique geologic features at the site. There are no known paleontological resources associated with the project site and as discussed in the Cultural Resources section, as a previously developed site and with no native soils being disturbed, the potential for identifying unrecorded resources is very low. Construction of the project involves ground disturbance and if unknown paleontological resources are encountered, there is the potential for a significant impact.

Mitigation Measures Culture-1 through Culture-3 would also reduce the potential impact related to unknown paleontological resources.

Compliance with the protection procedures specified in mitigation measures Culture-1 through Culture-3 would assure that if any previously-unknown paleontological resources are discovered, these would be handled appropriately and the impact with respect to paleontological resources would be ***less than significant with mitigation***.

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

This section utilizes information from the Air Quality & Greenhouse Gas Assessment prepared for this analysis by Illingworth & Rodkin, Inc. and dated May 6, 2022, included in full as Attachment A.

a) Greenhouse Gas Emissions

BAAQMD determined that greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. Construction and operation of the proposed project would be additional sources of GHG emissions, primarily through consumption of fuel for transportation and energy usage on an ongoing basis.

State Assembly Bill 32 (AB 32) required California state and local governments to reduce greenhouse gas emissions to 1990 levels by 2020. State Senate Bill 32 was subsequently adopted to require that there be a further reduction in GHG emissions to 40% below the 1990 levels by 2030.

In April 2022, BAAQMD issued new GHG emissions thresholds to address 2030 reduction targets, revising the quantified threshold to a checklist of compliance, requiring consistency with either criterion A or B to make a determination that the impact would be less than significant as follows:

A. Projects must include, at a minimum, the following project design elements:

1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
2. Transportation
 - a. Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
 - b. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the

recommendations provided in the Governor’s Office of Planning and Research’s Technical Advisory on Evaluating Transportation Impacts in CEQA:

- i. Residential projects: 15 percent below the existing VMT per capita
- ii. Office projects: 15 percent below the existing VMT per employee
- iii. Retail projects: no net increase in existing VMT

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Regarding criterion A, the proposed buildings would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficacy standards and would meet BAAQMD’s checklist as follows:

A.1.a. Avoid construction of new natural gas connections for the residential building,

Conforms – compliance with City Reach Code would prohibit natural gas infrastructure in new buildings.

A.1.b. Avoid wasteful or inefficient use of electricity,

Conforms – would meet CALGreen Building Standards Code requirements that are considered to be energy efficient.

A.2.a. Include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance, and

Conforms – the project would provide 95 EV/Clean Air parking spaces out of the 745 proposed on-site parking spaces and would be in compliance with this requirement.

A.2.b. Reduce VMT per service population by 15 percent over regional average.

Conforms – The TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code. With this required TDM Plan reduction, VMT per service population would be reduced by at least 15 percent over regional average (see Section 17 Transportation).

As indicated above, all relevant criteria would be met and the project would therefore be considered to have a **less than significant** impact with respect to Greenhouse Gas Emissions.

Note that it is not necessary to consider criterion B since the project meets criterion A. However, the following information is provided for informational purposes.

On September 27, 2021, the San Carlos City Council adopted a new Climate Mitigation and Adaptation Plan (CMAP) to reduce GHG emissions. The CMAP aims to reduce emissions 40% by 2030 and 80% by 2050 relative to 1990 levels. This CMAP is an update to the 2009 Climate Action Plan (2009 CAP) that provides updated information, an expanded set of GHG reduction strategies, climate adaptation strategies and a planning horizon out to 2050. There is not currently a checklist for development project, but the following goals and strategies found in the CMAP would be relevant to this project:

Goal 1: Reduce energy use

- o Strategy 1: Regional Energy Conservation and Efficiency Programs. Promote available energy efficiency and conservation opportunities, incentives, and technical assistance for businesses and residents.

Conforms – The TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code. With this required TDM Plan reduction, VMT per service population would be reduced by at least 15 percent over regional average (see Section 17 Transportation).

Goal 2: Transition to carbon-free energy sources

- o Strategy 4: Electrification. Transition to electricity as the primary energy source citywide.
- o Strategy 5: Building Codes. Advance electrification through local amendments to the California Building Code.
- o Strategy 7: Peninsula Clean Energy. Continue to support and promote PCE as the community's official electricity provider with a goal to provide 100 percent carbon-free renewable energy by 2025.

Conforms – compliance with City Reach Code would prohibit natural gas infrastructure in new buildings. Peninsula Clean Energy is the electricity provider.

Goal 4: Promote sustainable development that reduces vehicle miles traveled

- o Strategy 17: Vehicles Miles Traveled. Reduce community-wide transportation-related emissions per resident and employee, with an emphasis on reductions from existing and new development in the city's core commercial, office, and industrial areas, including development on the east side.

Conforms – The TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code. With this required TDM Plan reduction, VMT per service population would be reduced by at least 15 percent over regional average (see Section 17 Transportation).

Goal 7: Become a zero-waste community

- o Strategy 27: Construction and Demolition Waste. Increase the amount of waste recycled during construction and demolition of buildings.

Assumed conformance – The project would be required to comply with Chapter 8.05 of the City of San Carlos's Municipal Code, which outlines requirements for Recycling and Diversion of Construction and Demolition Debris.

As detailed above, the project would conform with relevant goals and strategies of the San Carlos CMAP, which is consistent with the less than significant impact conclusion.

To further support conclusions related to the qualitative criteria above, GHG emissions were modeled quantitatively using CalEEMod, as discussed in the Air Quality section, and are included

here as an informational item. To meet 2020 reduction targets, BAAQMD had recommended threshold of significance for operational GHGs of 1,100 metric tons CO₂e¹² per year or, if the project was too large to meet that threshold, an efficiency threshold of 4.6 metric tons CO₂e per service population (residents and employees) per year. Because this is a large office/R&D project, the applicable threshold for this analysis is the efficiency threshold. While BAAQMD did not update recommendations to address 2030 reduction targets, industry standard is to assume an additional 40% reduction per State directives, which equates to a standard of 2.8 metric tons CO₂e per year per service population. A summary of the results is included in **Table 8**.

Table 8: Greenhouse Gas Emissions

Description	GHG in metric tons CO ₂ e per year		
	Existing Use	Proposed Project	Net Increase
Project Emissions, Operational	830	2,467	1,637
Project Emissions, Construction (averaged over 40 years) ²	0	57	57
Project Emissions, Total	830	2,524	1,694
Project GHG Efficiency (Emissions per Service Population)³			1.6
Project Service Population 2030 Extrapolated Efficiency Threshold			2.8
<i>Exceeds Threshold?</i>			<i>No</i>

Source: Illingworth & Rodkin, 2022, Table 9 in Attachment A.

- 1 CO₂e is carbon dioxide equivalent units, the standard measure of total greenhouse gasses.
- 2 Standard practice is to divide the construction emissions by 40 years (an average building life) and add that to the operational emissions for comparison to thresholds.
- 3 Service Population was calculated at approximately 300 square feet per employee for office/R&D, which equates to 1,085 employees.

As shown in Table 8 above, quantified GHG emissions would be below the relevant efficiency threshold and therefore consistent with the less than significant impact conclusion.

b) Greenhouse Gas Reduction Plans

See the Air Quality section for an analysis of the project’s consistency with the regional Clean Air Plan. Additionally with respect to GHG emissions, the Clean Air Plan includes the goal to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. This is consistent with the target reductions intended to be met by the BAAQMD thresholds and City’s CMAP. As demonstrated under criterion a) above, the project would be consistent with BAAQMD thresholds and the City’s CMAP and would therefore be consistent with the GHG emissions reduction goal of the Clean Air Plan.

¹² CO₂e is carbon dioxide equivalent units and is the standard measure of total greenhouse gasses.

Additionally, emissions associated with the development of the proposed project were analyzed per the BAAQMD May 2017 CEQA Air Quality Guidelines, as updated. BAAQMD's thresholds and methodologies take into account implementation of state-wide regulations and plans, such as the AB 32 Scoping Plan and adopted state regulations such as Pavley and the low carbon fuel standard. Therefore, there would be ***no impact*** with respect to consistency with GHG reduction plans.

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

This section utilizes information from the Phase I Environmental Site Assessment prepared for the applicants by PES Environmental, Inc., dated November 30, 2021, which is available as part of the project application materials.

a) Routine Use of Hazardous Materials

It is likely that equipment used at the site during construction activities could utilize substances considered by regulatory bodies as hazardous, such as diesel fuel and gasoline. However, all construction activities would be required to conform with Title 49 of the Code of Federal Regulations, US Department of Transportation, State of California, and local laws, ordinances, and procedures.

While specific tenants have not yet been identified, any commercial uses would involve household hazardous waste such as cleaners. R&D laboratories additionally are likely to handle materials considered to be biological hazards and/or chemical hazards. The San Mateo County Environmental Health Division enforces regulations pertaining to safe handling and proper storage of hazardous

materials to prevent or reduce the potential for injury to health and the environment. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Additionally, the City is in the process of developing regulations relating to BioSafety standards, with which future tenants of this proposed project would be required to comply.

With compliance with applicable regulations, project construction and operations are not anticipated to create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials (*less than significant*).

b, d) Hazardous Materials Site and Accidental Release

The site is a listed hazardous materials site for past contamination related to historic use of the 833 Old County Road property as a petroleum fueling facility and as an oil storage facility. A portion of the project site was also a former railroad spur, which may cause contamination due to chemicals associated with train operations, railroad ties, spills, or releases from rolling stock, and the use of pesticides and/ or herbicides. Historical records also indicate the former presence of a machinery manufacturing plant and furniture assembly facility. No current use of the project site is reported as a concern regarding hazardous materials.

803/821 Old County Road - A 750-gallon underground storage tank (UST) used to store gasoline, diesel, and/or kerosene until 1996 was removed from the southwest corner of the 803 Old County Road property in 1997. Several holes were found in the bottom of the tank at that time. Groundwater remediation was done in 2000, and the property received a Case Closure notice from the San Mateo County Health System in 2012. The GeoTracker database shows the property as a completed and closed LUST cleanup site as of July 2012.

833 Old County Road – Eight groundwater monitoring wells were installed in 2002, and testing showed total petroleum hydrocarbons and benzene were detected in high levels. Quarterly testing was recommended at that time, but reports were only found until March 2005. In 2004, aboveground storage tanks and piping were removed, with a note that removal of all below grade piping and demolition of fuel dispensers/islands would occur at a later date, with no follow up documentation. Regional Water Quality Control Board lists this as an open case and that additional groundwater monitoring would still need to be completed to receive case closure. One existing groundwater monitoring well was found to be compromised and backfilled with dirt and debris, creating a potential conduit allowing hazardous material to enter groundwater, although no known hazardous materials were present on the current site. The other 6 wells' condition is unknown at present. In 2020, a Phase I report noted the possible presence of a subsurface gasoline vapor tank and underground product piping. The property owner (a separate entity than the current project applicant) had not completed the San Mateo County Department of Environmental Health facility closure process by providing evidence of removal of the UST and piping.

Due to the known potential for contamination at the site, various tests of the groundwater and soils have been performed at the site over the years, with the following conclusions:

- **Soils:** Elevated concentrations of petroleum hydrocarbons and associated compounds were found in soil investigations. Affected soils were found primarily between 6 and 12 feet below ground surface. The limits of the petroleum hydrocarbon-affected soil have been identified in

areas studied laterally and vertically on all sides with the exception of the northeastern extent where the property boundary was reached. At the property boundary, available soil data indicate that likely concentrations of total petroleum hydrocarbon as gasoline and quantified as diesel are below commercial regulatory action levels for a commercial property.

- **Groundwater:** Elevated concentrations of petroleum hydrocarbons and associated compounds were found at the project site, and it has been identified as a potential source of petroleum hydrocarbon-affected groundwater on one or more hydraulically downgradient sites. Affected groundwater is roughly coincident with the affected soil and is bounded as well to the subject property on all sides except the northeastern boundary. By the time the affected groundwater reaches the site boundary, concentrations of total petroleum hydrocarbons have decreased significantly from the highest concentrations and possible free phase product found in the center of the property to levels below associated regulatory levels for non-drinking water.
- **Soil Vapors:** Soil vapor sampling did not identify widespread chemical vapors across the site except in very localized areas consistent with high concentrations of total petroleum hydrocarbon as gasoline in soil and/or groundwater. These chemical vapors were typically volatile organic compounds (VOCs) associated with petroleum fuels including benzene, xylenes, MTBE, ethylbenzene, and hexane. Naphthalene was found in one localized spot at an elevated concentration and may be related to historical uses of the subject property as a lumber yard. Scattered occurrences of chloroform were found along the subject property boundaries with Old County Road and Bransten Road at concentrations above regulatory action levels. The source of the chloroform is unknown and may be related to water and/or sewer leaks on- or off the subject property.

841 – 851 Old County Road – The properties have been investigated for soil and groundwater contamination over the years and have been found to have groundwater contaminated with petroleum hydrocarbon, benzene, and chloroform originating from 833 Old County Road. Although multiple businesses at this property have been listed as handling hazardous materials, no violations were ever issued.

The project site is currently an open but inactive fuel leak case with the Regional Water Quality Control Board (RWQCB).

The proposed project includes a subterranean garage that would require removal of all soil within the bounds of the project site to a depth of approximately 25 feet, which would effectively remediate the environmental concerns associated with the on-site soil contamination. This soil excavation process would allow for discovery and removal of all suspected or unknown subsurface features that could be contributing to off-site or downgradient contamination levels. These would be managed properly and transported off site.

Mitigation Measure

Haz-1: Adherence to Remediation Measures. The applicant shall work with RWQCB to re-activate the fuel leak case and prepare and implement an agency approved remediation plan. The plan may include preparation of a Site Mitigation Plan to provide procedures and protocols for excavation, waste classification, and transportation/disposal of the contaminated soil; design of an excavation dewatering treatment system to manage the residual contamination in groundwater and excavation water generated during remediation and grading activities and potential off-site up-gradient considerations; evaluation and design, if needed, of a soil vapor barrier extension to the waterproofing

system for some or all of the perimeter subterranean garage walls to mitigate chemically-affected soil vapor from migrating onto the project site; and further assessment of adjacent down-gradient properties, as required by the RWQCB, to evaluate conditions following completion of the on-site remediation and subgrade construction activities.

Existing Buildings – All existing structures on the project site were constructed in or before the 1970s and therefore have the potential for both asbestos containing materials and lead-based paint.

Mitigation Measure

Haz-2: Lead-Based Paint and Asbestos Abatement. Prior to demolition, the project sponsor shall demonstrate that buildings have been assessed for asbestos-containing materials and lead-based paint and that any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.

Implementation of mitigation measures Haz-1 and Haz-2 would require implementation of a Remediation Plan in coordination with RWQCB to address existing site contamination and hazardous building material assessment and abatement prior to demolition of existing buildings, which would reduce the effects of hazardous materials from the soil or demolition to ***less than significant with mitigation***.

c) Hazardous Materials Near Schools

No school is located within one-quarter mile of the project site. Therefore, the project would have ***no impact*** with respect to hazardous materials near schools.

e) Airport Hazards

The closest airport is the San Carlos Airport, approximately 0.4 miles from the project site. According to the Airport Land Use Compatibility Plan, the project site is within the Airport Influence Area (Area B). The site is not within a primary flight path but is within the traffic pattern zone. Office and R&D uses are identified as compatible uses in this zone. The majority of the site has an allowable height of 155 feet above mean sea level. Factoring in the height of the site, the highest rooftop elements would reach maximum heights of approximately 132 feet above mean sea level, which would be below the FAA height limits. Because of the location within the Airport Land Use Compatibility Plan area, the project would be subject to Airport Land Use Commission approval to receive confirmation that their proposed building is compatible with height constraints and would not include elements dangerous to aircraft such as blinking lights, smoke columns, or attraction of birds.¹³ The project appears to be in conformance with the applicable rules. There are no other airports, either public or private within the vicinity of the project. There would be a ***less than significant impact*** related to airport hazards.

¹³ City/County Association of Governments of San Mateo County, Adopted October 2015, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*, Exhibits 4-3 and 4-4 and p. 4-26.

f) Emergency Response Plan

The project would not include any changes to existing public roadways that provide emergency access to the site or surrounding area. The proposed project would be designed to comply with the California Fire Code and the City Fire Marshal's code requirements that require on site access for emergency vehicles, a standard condition for any new project approval.

No substantial obstruction in public rights-of-way has been proposed with the project's construction activities. However, any construction activities can result in temporary intermittent roadway obstructions, but these would be handled through standard procedures with the City to ensure adequate clearance is maintained.

Therefore, with compliance with applicable regulations and standard procedures, the impact with respect to impairment or interference with an Emergency Response or Evacuation Plan would be ***less than significant***.

g) Wildland Fire

The project site is located in an urbanized area removed from areas typically subject to wildland fire.¹⁴ Therefore, the project would have ***no impact*** related to wildland fire.

¹⁴ City of San Carlos, *San Carlos 2030 General Plan EIR*, June 2009, p. 4.6-18.

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

This section utilizes information from the Design-Level Geotechnical Investigation prepared for the applicants by Cornerstone Earth Group, dated July 16, 2021, which is available as part of the project application materials.

a) Water Quality and Discharge

Water quality is regulated by both State and Federal agencies under the authority of the Clean Water Act (CWA). Projects that have the potential to degrade water quality are subject to the regulations of those agencies. Operational activities may involve common urban pollutants such as surface litter, oil, gasoline, grease, paint, fertilizers, pesticides, and herbicides. Construction activities involving soils disturbances have the potential to result in increased erosion and sedimentation to surface waters, and could produce contaminated storm water runoff, a major contributor to the degradation of water quality.

The proposed project is located in an industrially zoned area and would include a net reduction of impervious surfaces with new landscaped areas. The project reduces the amount of impervious surface and includes a plan for stormwater retention on-site in compliance with regulations. During construction, the City would require the project to develop and implement BMPs to control erosion

associated with construction such as watering the exposed soil, and permanent features to treat stormwater runoff. The impervious surface coverage is reduced to 89% (from 92.5% coverage) with the addition of landscaped areas in compliance with Section 18.07.040 of the San Carlos Municipal Code.

Stormwater runoff water quality is regulated by the National Pollutant Discharge Elimination System (NPDES) Program (established through the CWA). The NPDES program objective is to control and reduce pollutants to water bodies from surface water discharges. Locally, the program is administered by the Bay Area Regional Water Quality Control Board (RWQCB). Compliance with the NPDES Permit is mandated by State and Federal statutes and regulations. The City of San Carlos participates in San Mateo's Stormwater Management Plan, which outlines maintenance activities to be undertaken by cities; targets industrial and illicit discharge; describes public information about stormwater; provides guidance to cities for construction permits; and establishes monitoring programs to measure the success of the other portions of the plan. Compliance with the NPDES Permit is mandated by State and Federal statutes and regulations. The municipalities in San Mateo County have to require post-construction stormwater controls as part of their obligations under Provision C.3 of the countywide municipal stormwater NPDES permit, which is similar to other municipal stormwater permits in the Bay Area. Any new construction would be subject to Provision C.3, which requires: pollutant removal treatment systems, operation and maintenance of treatment measures, and a limitation on increase of peak stormwater runoff discharge rates. Project applicants must prepare and implement a Stormwater Control Plan, as detailed in **Standard Condition: Stormwater Control Plan**, included in Table 1, containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the SMCWPPP C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

The proposed project would retain much of the existing stormwater control system while also adding additional water efficient landscaping, including green terraces and patios. The project has prepared preliminary stormwater treatment plans and C.3 worksheets demonstrating the change in impervious area at the site and appropriateness of stormwater system elements. The proposed project would reduce the impervious surfaces by 4,576 square feet to 132,784 square feet, representing a post-project condition with impervious surfaces on 89% of the site. The use of additional street-level flow through planters is not proposed, as the project would be built on top of an underground parking garage. There are currently two locations along Bransten Road and Commercial Street that are designated for flow-through treatment planters to treat roof runoff. The project applicants are requesting a 45% reduction in LID treatment measures, due to the project's qualification as a "Special Project" Category C. As detailed in the Geotechnical Investigation, stormwater infiltration locations within 10 feet of the buildings would create a geotechnical hazard. Details of the on-site stormwater system will be finalized through compliance with C.3 requirements.

Through compliance with post-construction requirements in Standard Condition: Stormwater Control Plan related to implementation of the NPDES permit C.3 requirements, including project preparation and implementation of a Stormwater Control Plan and Stormwater Facility Operation and Maintenance Plan, the long-term volume of water and water quality impacts from project operation would be **less than significant** and the project would comply with applicable water quality control regulations.

b) Groundwater Recharge and Supplies

The groundwater at the site is not used by this or other projects as a water supply. Additionally, the project would comply with stormwater drainage requirements (see item a above). The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and would have a less than significant impact related to groundwater.

As discussed in more detail in the Section 7: Geology and Soils, project construction activities would require excavation and related dewatering activities. Because groundwater at the site is not used for drinking water or for aquatic habitat and draw-down from dewatering activities would be temporary, this would not be considered a significant impact on groundwater supplies.

As discussed under this Section 10(a) above, the project would comply with stormwater drainage requirements. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and would have a **less than significant** impact related to groundwater.

c) Drainage Pattern Alteration

As discussed under item a, the site is currently fully developed, and runoff drains to the City's storm drainage system. The project would reduce impervious site area and slow and treat run-off with bio-retention areas prior to discharge into the storm drainage system. Through compliance with applicable regulations, as detailed in **Standard Condition: Stormwater Control Plan**, included in Table 1, the runoff from the site would be the same or reduced from that existing and would not cause erosion, siltation, or flooding. Project impacts related to alteration of drainage patterns would be **less than significant**.

d) Inundation

The project is not located within a Federal Emergency Management Agency (FEMA) Flood Zone and is therefore not considered to be subject to a substantial risk of flooding.¹⁵ The project site is not located within an area subject to inundation in the event of a failure of any dam.¹⁶ The project site is not located in an area that is protected by levees.

A tsunami or seiche originating in the Pacific Ocean would lose much of its energy passing through San Francisco Bay. Areas most likely to be inundated are those at or below sea level and within 1½ miles of the shoreline. The site is approximately 2¾ miles inland from the San Francisco Bay shoreline. The site elevation is also more than 66 inches above mean sea level, which is the projected potential sea-level rise by 2100.¹⁷ Relatedly, the site is mapped by the State of California Tsunami Inundation Map as not being within an inundation area.¹⁸ Additionally, the site is not located proximate to a hillside that could generate mudflow.

Therefore, the potential for inundation due to tsunami, seiche, dam or levee failure, sea level rise, or mudflow would be **less than significant**.

¹⁵ Federal Emergency Management Agency (FEMA), effective 4/5/2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0042F, available at <https://www.fema.gov/flood-maps>.

¹⁶ City of San Carlos, *San Carlos 2030 General Plan*, p.194.

¹⁷ California Department of Water Resources, California Climate Science and Data for Water Resources Management, June 2015.

¹⁸ California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, Redwood Point/Palo Alto Quadrangle, June 15, 2009, available at http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps.

11. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			<input checked="" type="checkbox"/>	

a) Physical Division of a Community

The project involves redevelopment of a currently-developed site and does not involve any physical changes that would have the potential to divide an established community (***no impact***).

b) Conflict with Land Use Plan

An environmental impact could occur when a project conflicts with a policy or regulation intended to avoid or reduce an environmental impact. The following discussion does not replace or preclude a consistency assessment for project approval considerations, which take into account more than potential impacts to the environment.

The site is currently zoned IH (Heavy Industrial), under which R&D use is explicitly allowed and office use is allowed with a conditional use permit. The applicant is proposing approval under a Planned Development (PD) rezone, which would define development standards including intensity, height, setbacks, etc.

The potential for the project, including the requested rezoning, to result in environmental impacts have been individually considered in all topic areas in this document and would not result in any significant impacts following mitigation. Therefore, the project would not conflict with a land use plan, policy, or regulation in a way that would result in a significant environmental impact and would have a ***less than significant*** impact with regard to land use plan conflicts.

12. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				<input checked="" type="checkbox"/>

a, b) Mineral Resources

San Carlos, including the project site, contains no known mineral resources.¹⁹ The project would have **no impact** with regard to mineral resources.

¹⁹ City of San Carlos, *San Carlos 2030 General Plan*, p.111.

13. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		<input checked="" type="checkbox"/>		
b) Generation of excessive groundborne vibration or groundborne noise levels?		<input checked="" type="checkbox"/>		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			<input checked="" type="checkbox"/>	

This section utilizes information from the Noise Assessment prepared for the applicant by Coffman Engineers and dated April 14, 2022, included in full as Attachment D.

a) Excessive Noise

Construction Noise

Standard construction practices and hours would be followed, consistent with City regulations. Construction equipment that generates excessive noise, such as pile drivers and blasting equipment, are not expected to be used in this project. The acoustical analysis estimated both the energy average of sound (Leq) and the single loudest piece of equipment (Lmax) and found that the Leq would range from 58 to 65 dBA, and the Lmax would range from 58 to 68 dBA. The City's noise ordinance limits during construction hours are 55 dBA L50 (measured using Leq) and 70 dBA Lmax. While the project construction would possibly exceed the L50 limit, the City's Municipal Code includes exemptions for construction activities conducted during certain daytime hours. As detailed in **Standard Condition: Construction Noise**, included in Table 1, the San Carlos Noise Ordinance (Chapter 9.30 of the Municipal Code) restricts construction activities to the hours of 8:00 AM to 5:00 PM on weekdays, 9:00 AM to 5:00 PM on Saturdays. All construction on the project would be conducted within the allowable hours. The impacts from noise generated by construction of the project would be *less than significant*.

Operational Noise

Operation of an office/R&D use does not typically produce substantial levels of noise. Traffic-related noise impacts generally occur with at least a doubling of traffic volumes on roadways adjacent to areas already at or above acceptable noise conditions. As detailed in the traffic study

(Attachment E), the net new traffic would be well below a doubling of volumes on area roadways and would therefore not result in traffic-related noise impacts.

The project intends to support unspecified research and life science tenants and therefore may have various pieces of mechanical equipment on the rooftops, including heat pumps, cooling towers and air handling units. Because the specific tenants and equipment has not yet been determined, the following measure would be implemented to ensure rooftop equipment noise levels would not result in a significant impact on the closest residential area.

Mitigation Measure

Noise-1: Rooftop Mechanical Equipment Noise Assessment. The applicant shall conduct a detailed mechanical noise analysis once rooftop equipment has been selected. If any equipment exceeds 87 dBA at 5 feet, provide silencers, barriers, or other noise mitigation treatments to reduce expected noise levels from the mechanical equipment to within the noise ordinance limits.

Except in an emergency situation, the standby generators would be run during monthly testing during daytime hours. Even if both generators (should a tenant install a second generator) be tested at the same time, the noise level would be below local noise limits.

The impacts from noise generated by operation of the project would be *less than significant with mitigation*.

b) Groundborne Vibration

Operation of an office/R&D use would not produce substantial levels of off-site vibration.

Typically, the most groundborne vibration would be caused by construction equipment during demolition, site excavation, and grading. Vibratory rollers, large bulldozers and loaded trucks carrying soil would produce the most vibrations. Construction vibration is evaluated to determine if it would result in building damage or annoyance at residential areas. Proposed construction activities do not include vibration-generation with the potential to impact the closest residential uses at over 500 feet away.

For structural damage to engineered concrete and masonry buildings like the adjacent structures, the California Department of Transportation recommends a vibration limit of 0.3 in/sec peak particle velocity (PPV). The project would be considered to result in a potentially significant vibration impact if it were to result in groundborne vibration levels exceeding 0.3 in/sec PPV at the adjacent commercial buildings, as that is the vibration level considered to have the potential to cause damage to such structures.

The Acoustical Analysis projected that construction-related vibration levels at nearby commercial buildings could exceed the damage threshold of 0.3 in/sec PPV if the following construction equipment were to be utilized within 5 feet of the adjacent buildings: Vibratory Rollers (up to 1.23 PPV at 5 feet), Large Bulldozers (up to 0.52 PPV at 5 feet), and Loaded Trucks (up to 0.45 PPV at 5 feet). Further analysis of vibratory roller vibration shows that at distances farther than 20 feet from existing structures, the vibration levels fall below the criteria. For other equipment such as large bulldozers and loaded trucks, vibration levels are expected to fall below the criteria at about 10 feet from the existing structures. The following mitigation measure would reduce the risk of structural damage to nearby structures due to construction vibration.

Mitigation Measure

Noise-2: Construction Vibration Reduction and Monitoring. Wherever feasible, operation of vibratory rollers shall be avoided within 20 feet of existing buildings and operation of other construction equipment such as large bulldozers or loaded trucks shall be avoided within 10 feet of existing structures on adjacent lots. If vibratory rollers must operate within 20 feet of existing buildings or other major construction equipment must operate within 10 feet of existing buildings, then a vibration monitoring plan shall be prepared and implemented to monitor construction vibration at the nearest structures.

With implementation of mitigation measure Noise-2, which requires setbacks for high vibration-generating construction work or vibration monitoring, the impact from groundborne vibrations during construction would be ***less than significant with mitigation***.

c) Airport Noise

The closest airport to the project site is the San Carlos Airport, approximately 0.5 miles to the south. The project site is within the boundary of the Airport Land Use Compatibility Plan (ALUCP) but is not within the area substantially impacted by airplane flyover noise (expected to be 60 dBA or less).²⁰ Impacts related to excessive aircraft noise exposure would be ***less than significant***.

²⁰ City/County Association of Governments of San Mateo County, Adopted October 2015, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport, Exhibit 4.1.

14. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			☒	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				☒

a) Substantial Population Growth

While neither housing nor population are directly created as a result of this project, employment opportunities can indirectly increase population and the demand for housing.

The General Plan estimated job growth in San Carlos of 8,530 jobs between 2005 and 2035, which would raise the projected jobs-to-housing ratio from 1.4 in 2010 to 1.7 in 2035. The trends in job growth and jobs-to-housing ratio are similar to those county-wide and consistent with regional projections, and the General Plan EIR concluded the impact related to population growth would be less than significant.^{21, 22}

Plan Bay Area 2050 is the current regional long-range plan charting the course for the future of the nine-county San Francisco Bay Area. Plan Bay Area 2050 focuses on four key issues — the economy, the environment, housing, and transportation. Plan Bay Area 2050 estimates a total addition of 1,403,000 total jobs to the Bay Area between 2015 and 2050. The project’s addition of up to 1,085 employees would increase jobs in the City and region incrementally. Compared to the total jobs projection for the entire Bay Area, the addition of 1,085 jobs would not be substantial or unplanned. The location of an employment center near local and regional transit (see Section 17: Transportation) would be consistent with Plan Bay Area 2050 goals to reduce vehicle travel while meeting area demand for growth.

Therefore, the proposed project represents a small portion of the job growth identified for the area, so resultant potential for population growth would not be substantial and unplanned, and the project would have a **less than significant** impact related to population growth.

b) Displacement of Housing or People

There is currently no housing or people at the site that would be displaced by the project. The project would have **no impact** related to displacement of housing or people.

²¹ City of San Carlos, San Carlos 2030 General Plan, Housing Element, pp.11, 12.

²² City of San Carlos, *San Carlos 2030 General Plan EIR*, June 2009, Chapter 4.10: Population and Housing.

15. PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services?	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Fire protection			☒	
b) Police protection			☒	
c) Schools			☒	
d) Parks			☒	
e) Other public facilities			☒	

a-e) Public Services

The proposed project is located on a developed site within San Carlos that is already served by public services. The project would not directly add population, and an office/R&D use would not be anticipated to substantially increase utilization of public services, such that new or physically altered facilities would be required. The minimal increases in demand for services expected with the worker population and potential indirect population growth (see Section 14: Population and Housing), would be offset through payment of development fees and annual taxes, a portion of which go toward ongoing provision of and improvements to public services. Therefore, the impact to public services would be ***less than significant***.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.			<input checked="" type="checkbox"/>	
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.			<input checked="" type="checkbox"/>	

a-b) Recreation

As an office/R&D project, the proposed project would not construct or substantially increase the use of public recreational facilities. On-site open space would be provided for employees in the form of a courtyard between the two buildings and upper-level terraces. The use of public recreational facilities would not be anticipated to increase substantially due to project employees such that physical deterioration would occur, or construction or expansion would be necessary. Therefore, the impact related to recreation would be *less than significant*.

17. TRANSPORTATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			<input checked="" type="checkbox"/>	
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			<input checked="" type="checkbox"/>	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm)?			<input checked="" type="checkbox"/>	
d) Result in inadequate emergency services?			<input checked="" type="checkbox"/>	

This section utilizes information from the CEQA Transportation Analysis prepared for this analysis by W-Trans, dated November 3, 2022, and included in full as Attachment E.

a) Circulation System Plans and Facilities

The Transportation Analysis assessed pedestrian, bicycle, and transit access and circulation and consistency with applicable regulations.

Pedestrians and Bicyclists: Sidewalks and crosswalks are provided on most streets in the immediate vicinity of the proposed project. Sidewalks exist along both sides of Industrial Road, as well as Old County Road, except for the segment south of Montgomery Street where there is only sidewalk on the east side. Currently, only intermittent sidewalks are available on Commercial Street, however a new sidewalk along the south side between Old County Road and Industrial Road has been proposed as part of a separate project. A pedestrian tunnel provides access from El Camino to Old County Road, under the above-grade Caltrain tracks.

Bicycle access to the proposed project site is currently available as Class II bike lanes on Old County Road and Industrial Road. All other streets in the project area require bicyclists to ride in the street and/or on sidewalks. A number of improvements to bicycle lanes around the project site are anticipated under the *City of San Carlos Bicycle and Pedestrian Master Plan, 2020*.

In order to provide improved and continuous access between the project site and San Carlos Caltrain Station and SamTrans bus stops along El Camino Real, the project would also include the following changes to the existing pedestrian and bicycle network:

- Demolish and reconstruct the sidewalks along the project frontages along Bransten Road, Commercial Street and Old County Road. This would include ADA-compliant curb ramps and improved sidewalks.

- Construct a new Class IV Bikeway along the western side of Old County Road between Bransten Road and Commercial Street. It is noted that Old County Road north of Bransten Road would remain a Class III Bike Route until additional portions of the Old County Road Class IV Bikeway is completed by others. The detailed design of the transition between the styles of bike lane is undergoing review and has not yet been finalized.
- Establishment of a bicycle crosswalk across Old County Road at the intersection of Old County Road/Bransten Road that connects the future Class IV Bikeway on Old County Road with Bransten Road.

All of these changes are required to be designed and constructed to meet City standards and would not increase hazards due to a geometric design feature or incompatible use. Therefore, the impact to pedestrian and bicycle facilities would be ***less than significant***.

Transit: Existing transit service to the study area is provided by Caltrain, and San Mateo County Transit District (SamTrans). The project site is located approximately 0.46 miles from the Caltrain station, and 0.1 miles from bus stops offering service from Route 397 (San Francisco to Palo Alto), Route 398 (San Francisco to Redwood City) and Route ECR (Daly City CART station to Palo Alto). As a project close to transit stops, the project is expected to generate trips via transit services. According to state CEQA guidelines, the addition of new transit riders should not be treated as an adverse impact because such development also improves regional flow by adding less vehicle travel onto the regional network. Therefore, the project is anticipated to have a ***less than significant*** impact on transit facilities and services.

Local Residential Streets: The City is working separately with local residents of the East San Carlos Neighborhood who are concerned about cut through traffic on their local streets. Based on analysis of the project trip generation, TDM plan reduction, trip distribution pattern and likely paths of travel, the number of cars from this project estimated to use local streets to travel between Old County Road and Industrial Road does not exceed the standards set by the City of San Carlos Neighborhood Traffic Management Program for a local street, and therefore does not qualify as a significant impact under CEQA.

Per Senate Bill 743 discussed under item b) below, auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion are no longer considered as a basis for determining significant impacts under CEQA. The following discussion is provided for informational purposes and to demonstrate compliance with circulation system roadway policies and is based on the Transportation Operations Analysis prepared by W-Trans, which is available as part of the project application.

The proposed project would generate an average of 2,346 net new trips daily, with 295 new trips during the AM peak hour and 237 new trips during the PM peak hour. The Transportation Operations Analysis concluded that with implementation of improvements included in the City's Transportation Improvement Fee Program, the project would not cause any study intersections or freeway segments to degrade from acceptable operations to unacceptable operations. While some intersections / freeway segments operate at conditions considered unacceptable under existing and/or cumulative conditions, the project's contribution to those intersections would be below applicable threshold levels. Therefore, the project would be consistent with applicable circulation system roadway planning and policies and would have a ***less than significant*** impact on the circulation system.

b) Vehicle Circulation and Congestion

Senate Bill (SB) 743 changes CEQA transportation impact analysis significance criteria to eliminate auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA (although a jurisdiction may choose to maintain these measures under its General Plan). The changes in CEQA Guidelines to implement SB 743 present vehicles miles traveled (VMT) as an appropriate measure of transportation impacts.

This discussion is a summary of the data, analysis, and conclusions in the complete Transportation Analysis, included in full as Attachment E.

Because the project site is currently occupied by commercial uses, the trip generation of those businesses was estimated and deducted from the trip generation of the proposed project. The proposed project would fit under both “Research and Development Center” and “General Office Building” land uses listed in the current *Trip Generation Manual*²³. For a conservative analysis, and to be consistent with other recently analyzed Life Sciences office projects in San Carlos, the higher daily trip generation rate for “Research and Development Center” and the peak hour trip generation rates for “General Office Building” were applied to approximate the number of vehicle trips generated by the proposed project based on the proposed square footage. The number of employees was estimated using an occupancy of approximately one employee per 300 square feet of office space, giving an estimate of 1,085 employees.

Consistent with both the California Office of Planning and Research’s (OPR) publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory* (2018) and the City of San Carlos’ *Transportation Significance Criteria Implementing Vehicle Miles Traveled* (2020), a proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact. Under OPR’s publication, as well as CEQA Guidelines Section 15064.3(b)(1), “generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.” The project is located within 0.5 miles of the El Camino Real transit corridor (a high quality transit corridor). However, under the City’s policies, as an office project, the VMT should be analyzed for potential impact. The C/CAG-VTA Bi-County Model was used to determine the VMT per service population baseline for the planning area, based on the “existing” year of 2019, to be 17.0 miles per day. Using a threshold of 15 percent below existing VMT, the significance threshold for the City of San Carlos would be 14.5 miles per day per employee. (See Attachment E for additional detail.)

A TDM plan is required for the proposed project to meet the City of San Carlos’ development guidelines, as detailed in **Standard Conditions: Transportation Demand Management**, included in Table 1, which would further reduce traffic generated by the project and contribute to use of alternate modes discussed above. The proposed draft TDM plan is estimated to reduce VMT by 21.7% (see Attachment E for details), but a more conservative estimate of 20% is used to compare against significance thresholds. The TDM plan must be completed and approved by the City prior to the first certificate of occupancy for the project, outlining the required 20% reduction, program and service measures, planning and design measures, monitoring, reporting, and assurance of success of the plan.

²³ Institute of Transportation Engineers, *Trip Generation Manual*, 11th Edition, 2021.

The estimated project VMT Service Population was calculated and compared against the significance threshold, with and without the reduced rate with implementation of the required TDM program, as summarized in **Table 9** below.

Table 9: Project Vehicle Miles Traveled

Daily Trips	Baseline VMT Rate	Significance Threshold (15% Below Baseline)	Project VMT Rate	Project VMT Rate (with TDM)
Employment-based VMT per Service Population	17.0	14.5	15.2	12.2

Note: VMT Rate is measured in VMT per Service Population; Project Reduced VMT Rate is 15.2 less 20%
 Source: W-Trans CEQA Transportation Analysis, 2022, Table 5 in Attachment E.

The estimated VMT per Service Population for this development, without considering the TDM measures required by the City of San Carlos Municipal Code, is 15.2 miles per day per employee. Taking into account implementation of the requirements in Standard Condition: Transportation Demand Management, the estimated VMT per employee for the project would be 12.2 miles, which is less than the 14.5 VMT threshold for office projects, resulting in a **less than significant** impact.

c) Hazards

The Transportation Analysis evaluated the sight distance at both project driveways and the proximity of the accesses to adjacent intersections. Vehicles would access the project site from driveways on Commercial Street and Bransten Road, with each driveway providing access to both the parking garage and the main internal roadway. Pedestrian entrances would face Old County Road, Bransten Road and Commercial Street, and walkways would connect the two buildings.

Sight distance at both driveways was found to be more than adequate compared to criteria in the *Highway Design Manual* published by Caltrans.

The vehicle queue for the westbound approach to Old County Road (on Commercial Street) was found on analysis to extend beyond and block access to the project site driveway on Commercial Street during peak hours. However, in the event the driveway is blocked, motorists would access the site via the Bransten Road driveway. As such, the queue on Commercial Street would not be a significant impact.

All roadway modifications proposed by the project would be designed and constructed to meet current City standards. None of the proposed changes, including changes to sidewalks, crosswalks, bicycle facilities, and travel lanes would increase hazards due to geometric design features. Overall, the project would have a **less than significant** impact.

d) Emergency Access

All driveways and internal roadways would be designed and constructed to meet current City standards, ensuring adequate emergency access. Emergency vehicles would access the project site via driveways on Commercial Street and Bransten Road. While the project would add project-generated traffic, all roadway users must yield the right-of-way to emergency vehicles. The project would have a **less than significant** impact on emergency access.

18. TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. 		<input checked="" type="checkbox"/>		

a) Tribal Cultural Resources

A record search of the Native American Heritage Commission Sacred Lands File was completed for the project and indicated there are no known sacred lands present in the vicinity of the site (see Attachment B). While no tribes have requested consultation for project in this area, notice was sent to listed tribes on February 10, 2022, per recommendation of the Native American Heritage Commission. One response was received within the required 30 response period from the Indian Canyon Band of Costanoan Ohlone People requesting tribal cultural resource monitoring during ground disturbance activities.

The records search performed by the Northwest Information Center (included in Attachment B) indicated that there is a moderate to high potential for the inadvertent discovery of previously unrecorded Native American resources based on the characteristics of the site and history of the region.

Mitigation Measures Culture-1, Culture-2, and Culture-3 would require appropriate monitoring and proper handling of any discoveries and would also reduce the potential impact related to unknown tribal cultural resources.

Compliance with the protection procedures specified in Mitigation Measures Culture-1, Culture-2, and Culture-3 and Standard Condition: Protection of Human Remains would require that if any previously-unknown tribal cultural resources and/or human remains are discovered, these would be handled appropriately and the impact of the project would be ***less than significant with mitigation***.

19. UTILITIES AND SERVICE SYSTEMS Would the project	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			<input checked="" type="checkbox"/>	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			<input checked="" type="checkbox"/>	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			<input checked="" type="checkbox"/>	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			<input checked="" type="checkbox"/>	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			<input checked="" type="checkbox"/>	

a, d-e) Utilities

The project would result in redevelopment of a site already provided with utilities and services. Utility connections would be made to lines in adjacent streets that are either already existing or will be upgraded through coordination with the nearby Alexandria Center for Life Science project. Certified professionals have prepared utility plans for the project (see Figure 5), which are reviewed by City staff, and utility providers would provide will-serve letters prior to issuance of construction permits. No capacity concerns have been raised that are not being addressed by the planned improvements. The project would comply with the City's requirements for waste and recycling. Therefore, while the project would be denser than what is existing on the site and could have a greater demand for utilities and generation of wastewater and solid waste, this would be served by existing facilities and existing regulations and processes would ensure the lines and connections to the site are appropriately sized. The impact on utilities and service systems would be ***less than significant***.

b) Water Supply

The discussion under this topic utilizes information from the Water Supply Assessment prepared for the applicants pursuant to Senate Bill 610 by EKI Environment & Water, Inc., dated October 2022,

which incorporates a letter of formal approval by Cal Water and which is available as part of the project application materials.

The purpose of a Water Supply Assessment is to evaluate whether a water provider has sufficient water supply to meet the current and planned water demands within its service area, including the demands associated with the proposed project, during normal and dry hydrologic years over a 20-year time horizon. Cal Water's Bear Gulch, Mid-Peninsula, and South San Francisco Districts share one contractual allocation of supply (referred to as their Individual Supply Guarantee or ISG) from the City and County of San Francisco's Regional Water System, and thus Cal Water manages the supplies for all three Districts collectively. Cal Water's ISG for the three Peninsula Districts is 39,993 acre-feet per year. The Region Water System has historically met demand in its service area in all year types. Future water availability is constrained by hydrology, physical facilities, and the institutional parameters that allocate the water supply of the Tuolumne River. In addition, statewide regulations and other factors can impact the system reliability. For example, the adoption of the Water Quality Control Plan for the San Francisco/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) is anticipated to reduce reliability during drought years in the future. The Cal Water Mid-Peninsula District Water Shortage Contingency Plan and Development Offset Program (discussed below) are being implemented to address future supply reliability.

If the "worst-case" supply scenario under the Bay-Delta Plan Amendment is implemented, shortfalls of up to 53% are projected during drought years. To address these future dry-year shortfalls, Cal Water would enact its Water Shortage Contingency Plan, which includes Mandatory Staged Restrictions of Water Use. The overall reduction goals in the Water Shortage Contingency Plan are established for six drought stages and address water demand reductions over 50%. The Water Shortage Contingency Plans for all three Peninsula Districts were revised as part of the 2020 UWMP update process and include detailed information about how drought risks are evaluated by Cal Water on an annual basis to determine the potential need for reductions.

In July 2021, Cal Water began preparation of a Development Offset Program for its three Peninsula Districts. The purpose of the Development Offset Program is to ensure that overall customer demand for water does not exceed available current or future supply under a range of hydrologic conditions, and to ensure the availability of water for residential, commercial, and other purposes for future water use in the three Peninsula Districts. As approved by the California Public Utilities Commission, the Development Offset Program will require any new residential, commercial, or industrial development within any of the three Peninsula Districts that is projected to increase demand by more than 50 acre-feet per year to pay a special facilities fee, referred to as a developer offset fee, consisting of a fee of \$15,400 per acre-feet of net demand increase.

The WSA prepared for this project utilized the historic water usage at the site (average of 2.1 acre-feet per year) and water usage estimation methodology per Cal Water preferences to project that the average annual net increase in water demand for the proposed project would total 46 acre-feet per year. This total includes all indoor and outdoor water usage.

This WSA concluded that the three Peninsula Districts' contractual ISG allocation of 39,993 acre-feet per year is sufficient to meet projected future demands with the proposed project having a minimal impact of less than 50 acre-feet per year. Future demands of the three Peninsula Districts, inclusive of the proposed project, are projected to reach, at most, 85% of Cal Water's contractual ISG allocation in normal hydrologic years. The shortfalls that are currently projected during dry years will be addressed through planned implementation of the Mid-Peninsula District Water Shortage Contingency Plan and Development Offset Program. Because the water demand estimated for the

project is less than 50 acre-feet per year, this project is not required to contribute to the Development Offset Program. Therefore, because the Water Supply Assessment prepared in collaboration with Cal Water determined that there would be adequate water supply, the project impact related to water supply would be ***less than significant***.

The project would also implement relevant water efficiency standards. The City of San Carlos has adopted green building standards and water efficient landscaping ordinances consistent with previous versions of the CalGreen building standards and the California Model Water Efficient Landscape Ordinance (MWELo). As part of state requirements, all new developments must comply with these efficiency standards. As such, the project development is expected to implement a number of water-efficient features, including, but not limited to:

- Use of low-flow lavatory faucets, kitchen faucets, toilets, and urinals in accordance with CalGreen Code; and
- Inclusion of low-water use landscaping and high-efficiency irrigation systems to minimize outdoor water use in accordance with MWELo.

c) Wastewater

Increased wastewater production due to the Alexandria Center for Life Science (ACLS) project, as well as other potential projects in the area, was modeled by civil engineering company Mott MacDonald. The report indicated that with the increased wastewater generated by the ACLS project, there would be a bottleneck due to a section of 8-inch diameter sewer pipe under Industrial Road that connects a 15-inch pipe on Commercial Street to the 21-inch main on Industrial Road. The ACLS project would upsize the 8-inch section to a 15-inch pipe and remove the bottleneck.

This project would connect to the wastewater pipe under Commercial Street, which connects to the studied area and would go through the upgraded pipe. With the larger flow capacity of the 15-inch pipe, the project would have a ***less than significant*** impact.

20. WILDFIRE If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				☒

a-d) Wildfire Risk and Emergency Response

The project site is within the developed urban area of San Carlos, which is not located in a very high fire hazard severity zone.^{24, 25} The proposed project would have **no impact** related to wildfire.

²⁴ California Department of Forestry and Fire Protection. 2007. San Mateo County Fire Hazard Severity Zones in State Responsibility Area. Available: <https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>.

²⁵ Department of Forestry and Fire Protection Fire and Resource Assessment Program, *San Mateo County Very High Fire Hazard Severity Zones*, November 24, 2008, available at: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf.

21. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		<input checked="" type="checkbox"/>		
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		<input checked="" type="checkbox"/>		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		<input checked="" type="checkbox"/>		

a) Environmental Quality

With the implementation of mitigation measures Bio-1 to protect nesting birds during construction and Culture-1 through Culture-3 to address the potential discovery of currently unknown cultural, tribal cultural, or paleontological resources at the site, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. The project would not impact rare or endangered wildlife species or eliminate important examples of the major periods of California history or prehistory.

b) Cumulative Impacts

The project would not result in adverse impacts that are individually limited but cumulatively considerable, including effects for which project-level mitigation were identified to reduce impacts to less than significant levels. All potential effects of the project were assessed in the context of area development, including specifically assessment of emissions impacts analyzed against cumulative thresholds per the Air District recommendations. Project-specific impacts would be less than significant with implementation of mitigation measures identified in this document, including mitigation measure Air-1 to address construction period dust and emissions, and Noise-2 to reduce ambient noise pollution, and would not result in contribution of considerable levels to cumulative impacts.

c) Adverse Effects on Human Beings

The project would not result in substantial adverse effects on human beings, either directly or indirectly. Mitigation Measures Air-1, Geo-1, Haz-1, Haz-2, Noise-1, and Noise-2 would minimize the potential for safety impacts related to construction-period emissions, appropriate techniques for safety during excavation and dewatering and building construction, disturbance of site contaminants, and noise and vibration levels from construction and operational equipment. Therefore, the potential adverse effects on human beings would be less than significant with mitigation.

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