

# HARBOR VIEW PROJECT

Final Environmental Impact Report  
SCH # 2018012016

Prepared for  
City of Redwood City

October 2022





***Errata to the Final EIR for the Harbor View Project, SCH #2018012016***

This Errata includes a minor edit to the Final EIR for the proposed Harbor View Project.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis. This Errata has been prepared to make a minor revision to a mitigation measure in the Final EIR. This modification is not considered to result in any new or greater impacts than identified and addressed in the Final EIR. Revisions to the Final EIR are shown below as excerpts from the Final EIR text. Added or modified text is underlined, while deleted text will have a strike out through the text. In conformance with Section 15121 of the State CEQA Guidelines, the Final EIR and all components and appendices thereof, including the Errata, are intended to serve as documents that will generally inform the decision-makers and the public of environmental effects of the Project.

Mitigation Measure BIO-3a, as shown in Chapter 4, page 4-55 of the Final EIR, is modified as set forth below:

***Mitigation Measure BIO-3a: Bird-Safe Building Requirements.*** ~~*To the extent feasible,*~~ *Bird-safe glazing treatments (e.g., fritting, frosting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing, or ultraviolet patterns visible to birds) shall be used to reduce the extent of untreated glass to less than 10 percent on each of the Project buildings.*

# HARBOR VIEW PROJECT

Final Environmental Impact Report  
SCH # 2018012016

Prepared for  
City of Redwood City  
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October 2022

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# CHAPTER 1

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## Introduction

### 1.1 Purpose of this Document

This Final Environmental Impact Report (Final EIR) document includes all agency and public comments received on the Draft Environmental Impact Report (Draft EIR, SCH #2018012016) for the Harbor View Project (proposed project). Written comments on the Draft EIR were received by the City of Redwood City during the public comment period from January 16, 2019, through March 8, 2019. Verbal comments were also received during a public hearing before the City Council on February 11, 2019. This document includes written responses to each comment received. The responses correct, clarify, and amplify text in the Draft EIR, as appropriate, and these text changes are included in Chapters 4 and 7 of this document. These changes do not alter the conclusions of the Draft EIR.

This Final EIR document has been prepared in accordance with the California Environmental Quality Act (CEQA), released pursuant to Section 15088 (Evaluation of and Response to Comments) of the CEQA Guidelines, and will be used by the decision-makers during project hearings.

### 1.2 Organization of the Final EIR

The Final EIR is organized as follows:

**Chapter 1 – Introduction and List of Commenters:** This chapter summarizes the project analyzed in the Draft EIR and describes the contents of the Final EIR. This chapter also contains a list of all of the agencies, organizations, and individuals that submitted comments on the Draft EIR during the public review period.

**Chapter 2 – Description and Analysis of the Applicant’s Revised Project:** This chapter describes the Applicant’s Revised Project, which was formulated partly in response to certain public comments submitted on the Draft EIR. This chapter also includes an environmental assessment of the Revised Project to the extent necessary to determine if different or more substantial impacts would result compared to those identified in the Draft EIR.

**Chapter 3 – Description and Analysis of a No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative:** This chapter describes and evaluates an alternative



development scenario that would accommodate development on the Project site under its existing zoning designation. The alternative involves 50 percent R&D/Laboratory use and 50 percent ancillary R&D Office use. This chapter also compares the environmental impacts identified for this new alternative to impacts of the Draft EIR Project.

**Chapter 4 – Revisions to the Draft EIR, Summary of Impacts and Mitigations and Policies:**

This chapter presents a revised version of Draft EIR Table 2-2, Summary of Impacts and Mitigation Measures. It also shows a revised version of Draft EIR Table 4.9-1, General Plan Policies consistency, as well as specific text changes triggered by certain comments submitted on the Draft EIR or by City staff.

**Chapter 5 – Master Responses:** To avoid repetition, this chapter contains responses that have been developed to respond to comments that were made by multiple commenters.

**Chapter 6 – Individual Comments and Responses:** This chapter contains the comment letters submitted on the Draft EIR, followed by City responses to each comments. Letters are grouped by agencies, organizations, and individuals, and each letter is assigned number for tracking. Individual comments within each letter are bracketed for clarity and numbered consecutively for ease of reference. For example, individual comments in Letter 1 are numbered 1-1, 1-2, 1-3, and so on. Immediately following each comment letter are numbered responses that correspond to each numbered comment. Generally, comments that have been addressed in a Master Response are referred back to the relevant Master Response in Chapter 5.

Responses focus on comments that pertain to the adequacy of the analysis in the EIR or to other aspects pertinent to the potential effects of the Project on the environment pursuant to CEQA. Comments that address topics beyond the scope of the EIR or CEQA are noted as such for the public record. Many comments express opinions about the merits or specific aspects of the proposed Project unrelated to an environmental effect; those comments are included in the Final EIR for consideration by the decision-makers.

**Chapter 7 – Responses to Comments Received at the Public Hearing on the Draft EIR:** This chapter presents the public comments made at the February 11, 2019, City Council public hearing (PH) on the Draft EIR. Each public comment is numbered PH-1, PH-2, and so on. Comments are shown verbatim, excerpted from the transcript of the public hearing, and in the order they occurred. Responses to each public speaker’s comment follow each comment. This chapter also presents City Councilmembers’ comments and questions made after the Council closed the public comment period; these comments are designated CC-1, CC-2, and so on.

**Chapter 8 – Mitigation Monitoring and Reporting Program (MMRP):** This chapter is the MMRP for the proposed project, prepared by the City pursuant to Section 15097 of the CEQA Guidelines.

## 1.3 Summary of Draft EIR Project

The Jay Paul Company, the project sponsor and applicant, assembled the 27.08-acre project site located at the southwest corner of the intersection of Seaport Boulevard and Blomquist Street in Redwood City, California. US-101 abuts the south boundary of the project site. Old Seaport Boulevard generally bounds the project site on the east, Blomquist Street bounds the project site on the north, and the west boundary is the new San Mateo County Maple Street Correctional Center (Correctional Center) and railroad spur to the Graniterock operations north of Blomquist Street. Former uses include the Malibu Raceway and Golf Course, building supply and light industrial uses, and a gasoline service station.

The original proposed project in the Draft EIR (“Draft EIR Project”) is a high tech office campus with four office buildings, two parking structures, and an employee amenities building. Specifically, the Draft EIR Project consists of 1,144,748 square feet of commercial office use, in addition to a 35,000 square-foot amenities building. The four proposed office buildings are each approximately 286,000 square feet in floor area and are seven stories tall (100 feet tall to rooftop; 123 feet to top of rooftop trellis/tower). The proposed amenities building is two-stories tall (30 feet tall to rooftop). The Draft EIR Project also proposes 3,855 automobile parking spaces, the majority of which will be provided in the two parking structures, and 40 surface parking spaces designated for general public uses. The overall project concept is an office campus centered around an approximately 4-acre green space with a series of landscaped spaces.

The project site is located within the “Industrial – Light (IL)” and “Industrial – Port Related (IP)” General Plan land use designations. It is located within the “Industrial Restricted (IR)” and “General Industrial (GI)” zoning designations. The project sponsor has requested a General Plan and Zoning Map Amendment to establish a “Commercial-Office Professional/Technology (CP)” General Plan land use designation and “Commercial Park” (CP) Zoning district for the site to accommodate the proposed office land use and proposed development standards. The project would also involve approval of a Development Agreement (DA) between the City and the Harbor View project sponsor, an Architectural Permit, and Tentative Parcel Map.

It should be noted that in response to the comments that were received on the Draft EIR, the project sponsor has revised the Draft EIR Project, and the project that is now proposed is referred to as the “Applicant’s Revised Project” or “Revised Project” throughout this document. The Applicant’s Revised Project reduced the number of buildings from four to three and a resultant reduction in office square footage to 785,150 square feet and a reduction in parking spaces, and the inclusion of a 20,000 square foot community building. A detailed description of the Revised Project is presented in Chapter 2 of this Final EIR.

## 1.4 Required Jurisdictional Approvals

### City of Redwood City

The Harbor View Project requires the following planning and regulatory approvals by the City of Redwood City, as the Lead Agency:

- 1) Certification of the project-level CEQA analysis in this EIR, adoption of CEQA findings and a MMRP;
- 2) Approval of an amendment of the General Plan Map and Zoning Map to adopt and apply a “Commercial Office Professional /Technology (CP)” land use designation and “Commercial Park (CP)” zoning district, respectively, to the project site.
- 3) Approval of a Development Agreement (DA) between the City and the Harbor View Project sponsor;
- 4) Architectural Permit; and
- 5) Tentative Parcel Map.

### Other Governmental Agency Approvals

As the Lead Agency, the City intends this EIR to serve as the CEQA-required environmental documentation for consideration of this project by other Responsible Agencies and/or Trustee Agencies that may have limited discretionary authority. Under CEQA Guidelines, the term “Responsible Agency” includes all public agencies, other than the Lead Agency, which have discretionary approval power over aspects of the project for which the Lead Agency has prepared an EIR. Under CEQA Guidelines, the term “Trustee Agency” means a state agency having jurisdiction by law over natural resources affected by the project which are held in trust by the people of California.

The City has notified the appropriate Responsible Agencies and Trustee Agencies according to statutory requirements, and they include, but are not limited to, the following:

#### Local Agencies

- County of San Mateo and associated agencies
- San Mateo County Office of Environmental Health
- Silicon Valley Clean Water (SVCW)

#### Regional and State Agencies

- California Department of Transportation (Caltrans)
- California Department of Toxic Substances Control (DTSC)
- Bay Area Air Quality Management District (BAAQMD)

## 1.5 Public Participation and Review

The City of Redwood City has complied with all noticing and public review requirements of CEQA. The following actions took place during the preparation, distribution, and review of the Draft EIR:

- On January 12, 2018, the City of Redwood City issued a Notice of Preparation (NOP) to inform agencies and interested parties of its intent to prepare and distribute a “Draft Environmental Impact Report for the Proposed Harbor View Project.” The City sent the NOP to agencies with statutory responsibilities in connection with the project and requested their input on the scope and content of the environmental information that should be addressed in the EIR. The NOP also included a Notice of Scoping Session, during which the public could provide input on the scope of the EIR.
- A public notice regarding the public Scoping Session and the availability of the NOP was published in *The Daily News* on January 12, 2018, and mailed via U.S. mail or emailed to interested parties on or before January 12, 2018. The 30-day comment period on the scope of the EIR occurred from January 12, 2018, to February 12, 2018. The City Council conducted the public Scoping Session at its January 22, 2018 regular meeting at the Redwood City Council Chambers.
- Upon completion of the Draft EIR, the City filed a Notice of Completion (NOC) with the Governor’s Office of Planning and Research (OPR) to begin a public review period per the requirements of Public Resources Code Section 21161. The Draft EIR was made available for public review and comment for the period of 52 calendar days, as identified on the Notice of Release/Availability (NOA) of the Draft EIR issued by the City. The Draft EIR was posted on the City’s website, and hard copies were made available for review at City Hall and at the Redwood City Main Public Library.
- On February 11, 2019, a public hearing was held before the City Council to receive comments on the Draft EIR. This Final EIR responds to those comments.

## 1.6 Public Comments

The City received 167 comment letters during the comment period on the Draft EIR in addition to numerous verbal public comments received during the City Council hearing on February 11, 2019. Chapter 6, *Individual Comments and Responses*, of this document includes a list the numerical designation assigned to each comment letter, the author of the comment letter and its affiliate (if any), and the date the City received the comment letter (see Table 6-1). Chapter 7, *Responses to Comments Received at the Public Hearing on the Draft EIR*, lists each public commenter who spoke at the February 11, 2019, public hearing on the Draft EIR (see Table 7-1).

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## CHAPTER 2

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# Description and Analysis of the Applicant's Revised Project

## 2.1 Introduction

This chapter describes and presents the analysis of the Applicant's Revised Project ("Revised Project"). In a letter dated February 20, 2019, the project applicant, the Jay Paul Company, informed the City that it intended to submit a revised application for the Harbor View Project in response to concerns expressed by the City Council and members of the community. The project applicant submitted a revised application package to the City on April 26, 2019, and subsequently modified the Revised Project to that described in this chapter.

## 2.2 Description of the Applicant's Revised Project

**Figure 2-1** shows the site plan of the Revised Project. For ease of comparison, **Figure 2-2** shows the site plan of the Draft EIR Project. The changes from the Draft EIR Project to the Revised Project are listed below and primarily involve a reduction in the number of buildings, a modified site layout and site coverage, and the addition of potential new uses.

Specifically, compared to the Draft EIR Project, the Revised Project

- reduces the total floor area of development of commercial office use from 1,144,748 square feet to 765,150 square feet;
- reduces the number of office buildings from four to three;
- reduces the height of two of the office buildings from seven stories (approx. 118 feet tall) to six stories (approx. 104 feet tall);
- reduces the number of parking structures from two to one;
- reduces the height of two of the office buildings from seven stories (approx. 100 feet tall to top of roof and 118 to top of penthouse/mechanical screening) to six stories (approx. 86 feet tall to top of roof and 104 feet tall to top of penthouse/mechanical screening);
- reduces total number of parking spaces from 3,855 to 2,551;
- designates 1,276 electric vehicle (EV) parking spaces (stalled, prewired and conduit only);





SOURCE: Jay Paul Company, 2022

Harbor View Project . 170951

**Figure 2-1**

Illustrative Site Plan and Landscaping - Revised Project





SOURCE: DES Architects + Engineers, 2018

Harbor View Project . 170951

**Figure 2-2**

Proposed Illustrative Site Plan - Draft EIR Project





SOURCE: DES Architects + Engineers, 2020

Harbor View Project . 170951

**Figure 2-3**

Applicant's Revised Project – Typical Building Architecture

- increases the percentage of pervious site coverage to 40 percent compared to 25 percent under the Draft EIR Project;
- increases the number of existing trees to be removed from 68 to 97;
- increases the number of driveways onto Blomquist Boulevard from two to three (and adds individual left-turn and right-turn egress lanes); and
- reduces the number of driveways onto Old Seaport from two to one.

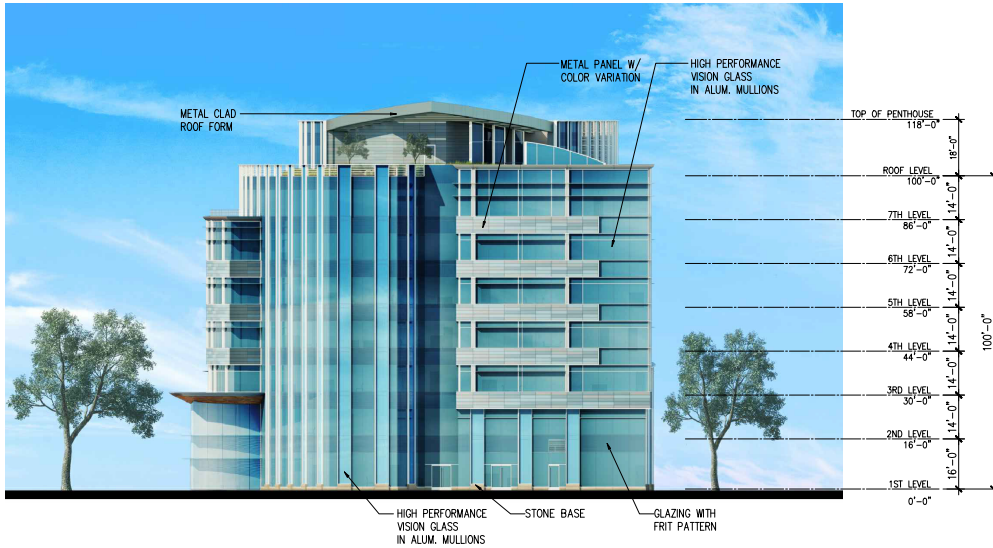
**Table 2-1** provides a side-by-side comparison of the principal project characteristics of the Revised Project and the Draft EIR Project.

**TABLE 2-1  
COMPARISON OF PROJECT CHARACTERISTICS - REVISED PROJECT AND DRAFT EIR  
PROJECT**

	Draft EIR Project	Applicant's Revised Project
Office (sf)	1,144,748	765,150
Amenities Building (sf)	35,000	35,000
Total Square Footage (sf)	1,179,748	800,150
Number of Office Buildings	4	3
Number of Parking Structures	2	1
Total Parking Spaces	3,855	2,551
EV and EV-prepped Parking Spaces <sup>a</sup>	0	1,276 (50%)
Maximum Building Height -	7 stories (118 ft.)	6 stories (104 ft.)
Landscaped / Open Space Area (on ground)	36% of site	40% of site
Driveway Access/Egress on Blomquist Blvd.	2	1
Driveway Access/Egress on Old Bayshore Blvd.	2	3
Total Site Acreage	27.08	27.08
Trees to be Removed	68	97
Service Population <sup>b</sup>	4,579	3,061
Peak Hour AM/PM (Daily) Trip Generation	1,511 AM / 1,236 PM (13,042 Daily)	1,010 AM / 826 PM (8,717 Daily)

<sup>a</sup> 254 charging installed (10%); 254 prewired (10%); and 768 conduit only (30%).

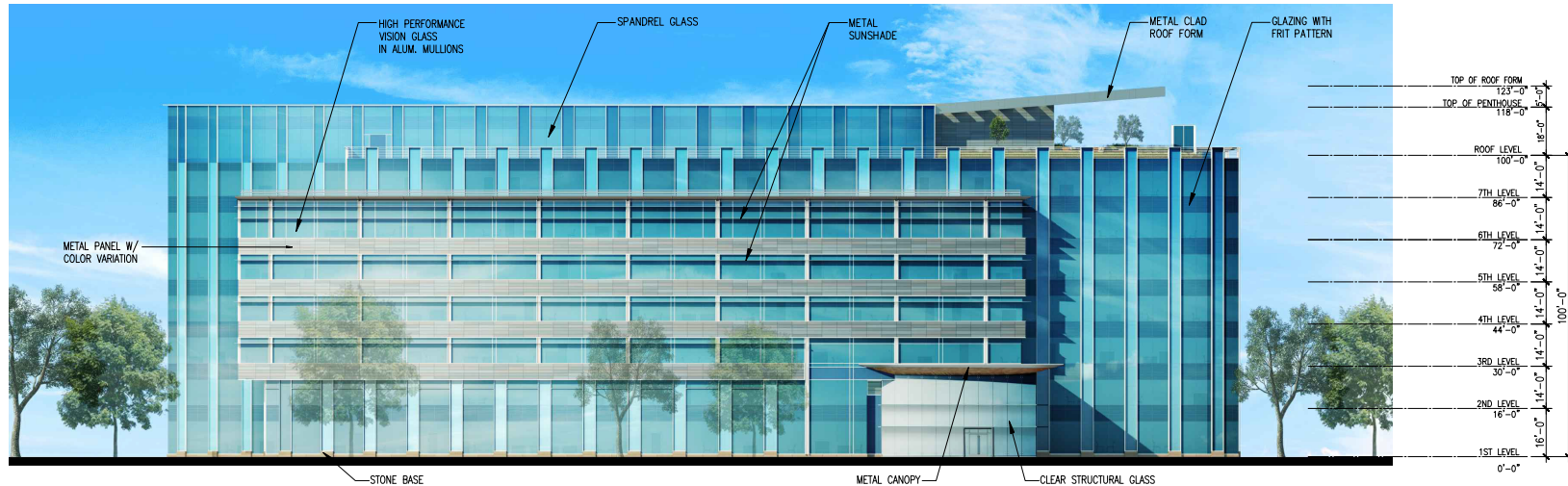
<sup>b</sup> Employee density of 1 employee per 250 square feet of gross office building floor area.



① SIDE ELEVATION

EXTERIOR MATERIAL LIST

Material	Color name & code	Building elements
<b>Glass</b>		
Vision glass (type 1)	VUE 1-50	Field glass
Frit glass (type 1)	VUE 1-50 w/ Bluish Grey frit Frit pattern TBD	
Spandrel glass (type 1)	VUE 1-50 w/ Bluish Grey spandrel Coating, color TBD	
Spandrel frit glass (type 1)	VUE 1-50 w/ frit on #2 surface and spandrel on #4 surface	
Vision glass (type 2)	VUE 1-30	Vertical band
Spandrel glass (type 2)	VUE 1-30 w/ Bluish Grey spandrel coating, color TBD	
Structural glass	Sentech structural glass	Front entry/ lobby, stair enclosure at roof top terrace
<b>Metal</b>		
Metal panel 1	Metal panels with 3 color variation, non-metallic sheen	
Metal panel 2	PPG Duranar metal panel color TBD	Mullions
<b>Stone</b>		
Stone cladding	Lime stone	1 <sup>st</sup> floor stone base
<b>Wood</b>		
Wood panel	Parklex, color TBD	Entry canopy soffit



② FRONT ELEVATION

SOURCE: Jay Paul Company, 2022

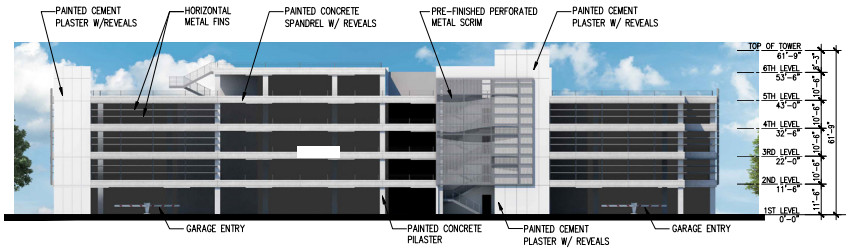
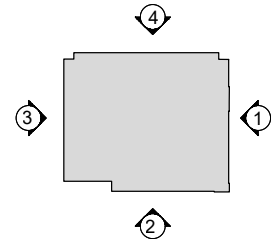
Harbor View Project . 170951

**Figure 2-4**  
Typical Building Elevation and Materials

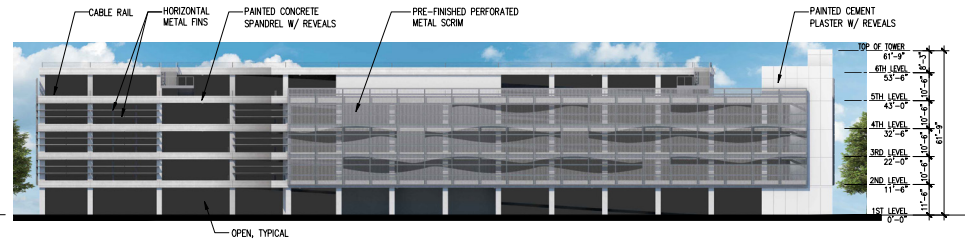


EXTERIOR MATERIAL LIST

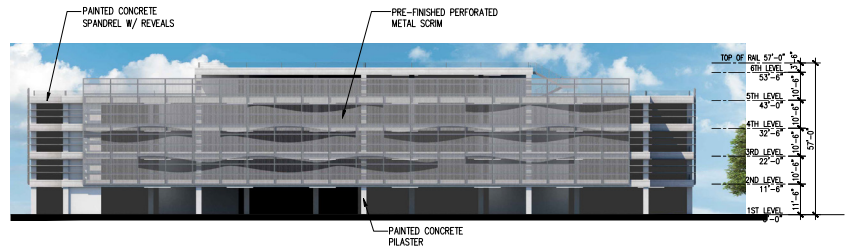
Material	Color name & code	Building elements
<b>Metal</b>		
Metal panel 1	Aluminum metal panel with large format, pattern & color TBD	Pre-finished perforated metal scrim
Metal panel 2	Aluminum metal panel color TBD	Mullions, horizontal metal fins
<b>Concrete</b>		
Concrete	Painted concrete, color TBD	Bands and pilasters
<b>Cement Plaster</b>		
Cement plaster	Painted cement plaster, color TBD	Stair and elevator towers



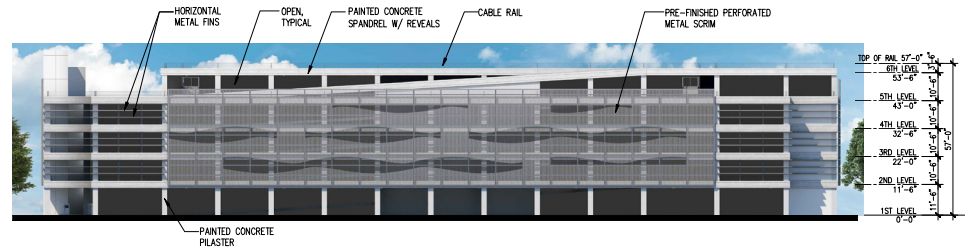
① EAST ELEVATION  
1"=20'-0"



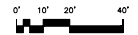
② SOUTH ELEVATION  
1"=20'-0"



③ WEST ELEVATION  
1"=20'-0"

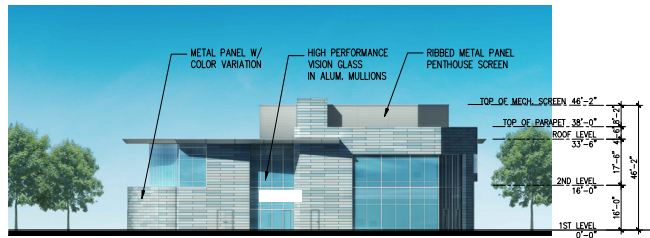
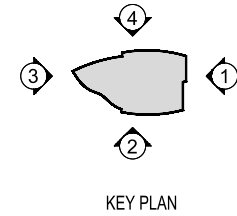


④ NORTH ELEVATION  
1"=20'-0"

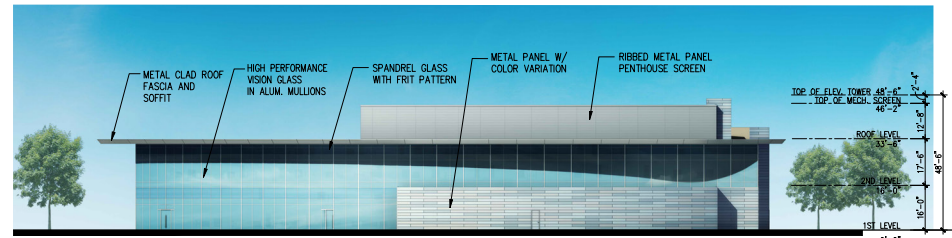


EXTERIOR MATERIAL LIST

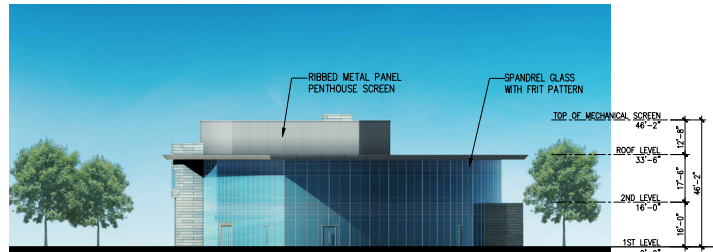
Material	Color name & code	Building elements
<b>Glass</b>		
Vision glass	VUE 1-50	Field glass
Frit glass	VUE 1-50 w/ linear frit pattern	
Spandrel frit glass	VUE 1-50 w/ frit on #2 surface and spandrel on #4 surface	
<b>Metal</b>		
Metal panel 1	Metal panels with 3 color variation, non-metallic sheen	Field wall
Metal panel 2	Alum. metal panel	Roof canopy fascia
Metal panel 3	PPG Duranar metal panel color TBD	Mullions
Metal panel 4	Alum. ribbed metal panels	Penthouse screen
Metal panel 5 wood look-alike	Metal wood + alum. profiles	Roof Soffit



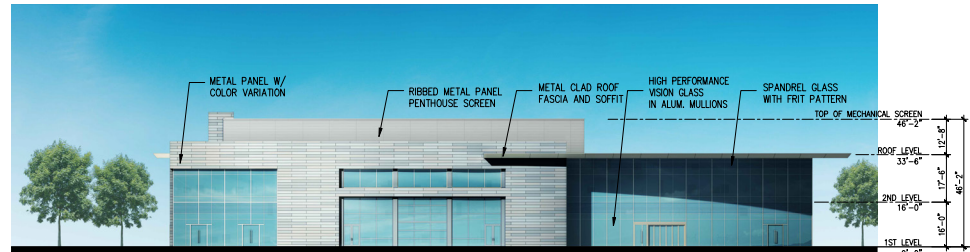
1 EAST ELEVATION  
1"=20'-0"



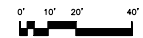
2 SOUTH ELEVATION  
1"=20'-0"

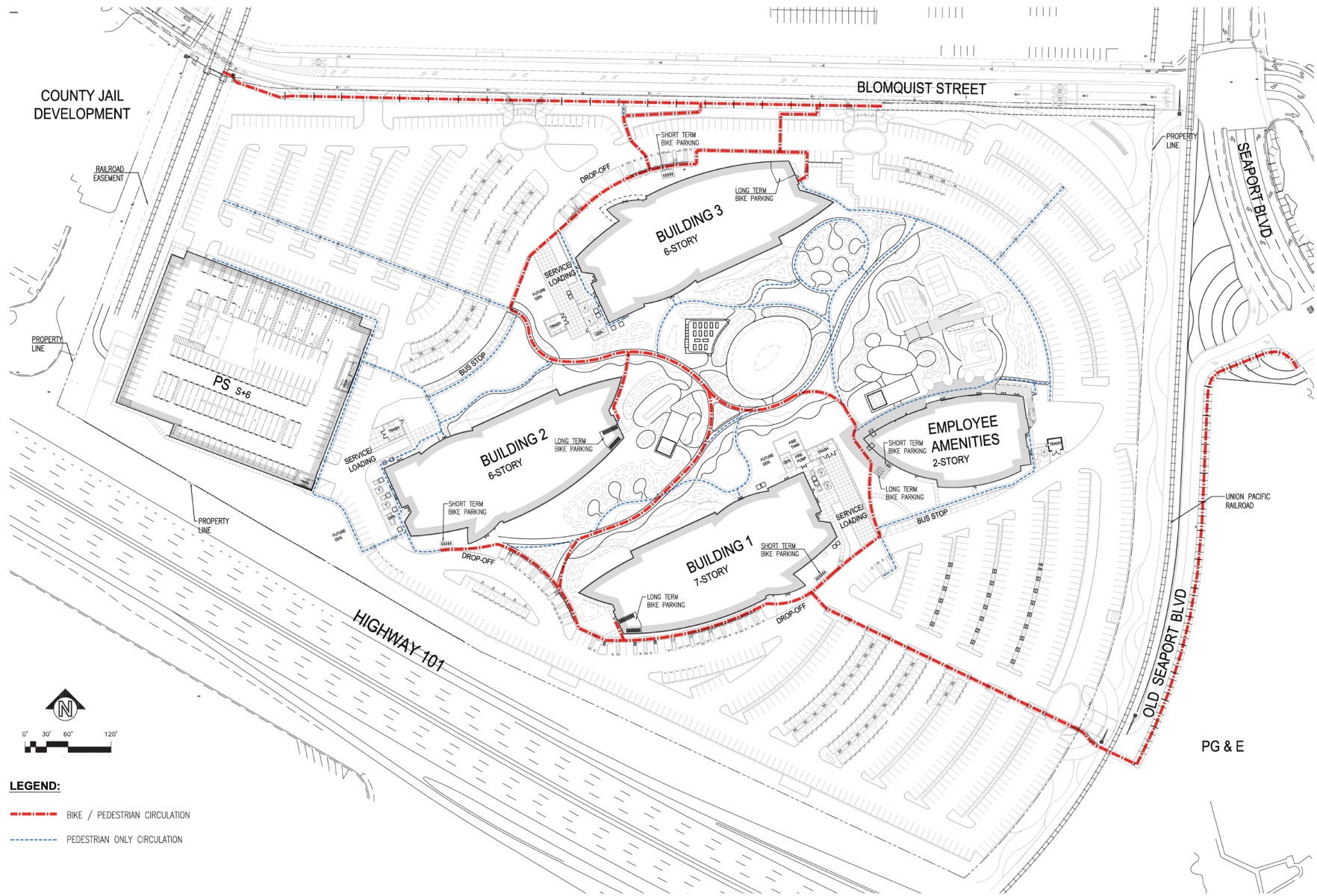


3 WEST ELEVATION  
1"=20'-0"



4 NORTH ELEVATION  
1"=20'-0"





SOURCE: Jay Paul Company, 2022

Harbor View Project . 170951  
**Figure 2-7**  
 Bike and Pedestrian Circulation

## 2.3 Analysis and Comparison of the Revised Project Impacts to the Draft EIR Project

This section focuses on the environmental assessment of the Revised Project to the extent necessary to determine if different or more substantial impacts would result compared to those identified in the Draft EIR. **Table 2-2** lists the environmental impact determinations for the Revised Project compared to those identified in the Draft EIR. The assessment of the Revised Project's impacts by each is presented following the table.

**TABLE 2-2  
COMPARISON OF ENVIRONMENTAL IMPACTS - REVISED PROJECT AND DRAFT EIR PROJECT**

	Draft EIR Project	Applicant's Revised Project
4.1 Aesthetics	LS	LS↓
4.2 <sup>a</sup> Air Quality (Construction)	LSM	LSM↓
Air Quality (Operations)	LS	LS↓
4.3 Biological Resources	LSM	LSM
4.4 Cultural / Tribal Resources	LSM	LSM
4.5 Geology and Soils	LS	LS
4.6 Greenhouse Gases / Climate Change	LS	<b>LSM↑<sup>b</sup></b>
4.7 Hazards / Hazardous Materials	LSM	LSM
4.8 Hydrology and Water Quality	LSM	LSM
4.9 Land Use and Planning	LS	LS
4.10 Noise (Construction)	LSM	LSM↓
Noise (Operations)	LS	LS↓
4.11 Population, Housing and Employment	LS	LS↓
4.12 Public Services / Recreation	LS	LS↓
4.13 Utilities / Service Systems	LS	LS↓
4.14 Transportation / Traffic	SU	SU↓

<sup>a</sup> The Draft EIR identified a SU cumulative air quality impact only. The Draft EIR Project would not exceed project-level significance thresholds for construction or operational criteria pollutant emissions, with the implementation of construction mitigation measures. Therefore, the Draft EIR's contribution to the cumulative impact for regional air quality impacts is not considerable, and its contribution to any cumulative air quality impacts is less than significant.

<sup>b</sup> Due to lower service population than the Draft EIR Project, the Revised Project results in a higher emission *per service population* metric than the Draft EIR Project.

**NOTES:** Impacts shown for most severe impact under each environmental topic.

LS Less than significant; no mitigation required

LSM Less than significant impact after implementation of all feasible mitigation measures

SU Significant and Unavoidable after implementation of all feasible mitigation measures

↑↓ Impact is more severe (↑) or less severe/reduced (↓) compared to the Draft EIR Project impact, but with no change in impact determination.

**Bold** means the Revised Project impact determination is different from the Draft EIR Project impact.

**Shading** means the *degree* of impact is substantially different from the Draft EIR Project impact.

## **Aesthetics**

***The Applicant's Revised Project would result in reduced less-than-significant (no mitigation required) aesthetics impacts as the Draft EIR Project.*** As described above, and as compared to the Draft EIR Project, the Revised Project would eliminate one office building, and two of the remaining buildings would be reduced in height. However, this analysis does not assume that relatively lower building height or less visibility of the development would necessarily mean a less adverse environmental effect than identified with the Draft EIR Project. The effect on the existing visual character or visual quality of the area would generally be the same as for the Draft EIR Project. However, the reduced overall development and building heights with the Revised Project would have a reduced effect on shadow and light/glare compared to the Draft EIR Project, but these effects would remain less than significant.

## **Air Quality**

***The Applicant's Revised Project would result in reduced less-than-significant (with implementation of mitigation measures) construction air quality impacts, and reduced less-than-significant operational air quality emission impacts, compared to the Draft EIR Project.*** This determination considers that the Revised Project would allow the construction of about 68 percent of the building area proposed by the Draft EIR Project (800 ksf compared to 1.18 msf). This would result in less construction activity than would occur with the Draft EIR Project, which would therefore result in relatively fewer criteria air pollutant emissions during construction. However, the less-than-significant impact and the construction-period mitigation measures addressing criteria pollutants would conservatively still apply with the Revised Project. Less-than-significant impacts regarding construction odors and toxic air contaminants (TACs) would be the same as with the Draft EIR Project.

Vehicle trips and building energy use are the primary sources of operational criteria air pollutants. The Revised Project would generate fewer daily and peak-hour vehicle trips (33 percent fewer AM, PM and daily trips) than the Draft EIR Project, which would result in lower operational emissions when compared to the Draft EIR Project. The Revised Project would comply with the City's Reach Code that requires all new construction to be all-electric buildings; this would eliminate air emissions associated with energy use. Therefore, operational air quality impacts associated with the Revised Project would remain less than significant, and no mitigation measures would be required, similar to the Draft EIR Project.

(Also see Table 5-2 in Master Response #1 in Chapter 5, *Master Responses*, of this document; and **Appendix A**, *Comparative Air Quality and GHG Emissions*.)

## **Biological Resources**

***The Applicant's Revised Project would result in the same less-than-significant (with implementation of mitigation measures) biological resources impacts as the Draft EIR Project.*** The Revised Project would involve a similar site layout as the Draft EIR Project, although some of the structures would be lower and one office building would be eliminated. The Project site is



not located near any areas of existing sensitive habitat or wetlands, therefore neither the Revised Project nor the Draft EIR Project would involve construction or operations near such areas. As indicated on Draft EIR pages 4.3-27 and 4.3-34, the Draft EIR Project proposed the removal of 68 trees, which was determined to result in the potential for direct losses of nesting birds and/or a potential conflict with the City's Tree Ordinance. A potentially significant impact was identified for each of these potential impacts. Mitigation Measure BIO-1c (Nesting Bird Measures) during construction was identified to reduce the potential impact to nesting birds to less than significant. Mitigation Measure BIO-4 (Tree Protection Measures) was identified to reduce the potential impact to protected trees during construction activity to less than significant.

The Revised Project would remove an additional 29 trees (for 97 total), which would result in the same potential impacts to nesting birds and protected trees during construction activity. All mitigation measures to address potential impacts to nesting birds, roosting bats and avian collisions and protected trees would continue to apply to the Revised Project, and the resulting impacts would remain less than significant.

### **Cultural / Tribal Resources**

***The Applicant's Revised Project would result in the same less-than-significant (with implementation of mitigation measures) cultural and tribal resources impacts as the Draft EIR Project.*** The Revised Project would involve similar overall construction and excavation activities as the Draft EIR Project, which would require the same standard mitigation measures to address the potential resource discovery of archaeological and paleontological resources and human remains. No historic resources are present on the site that could be potentially affected.

### **Geology and Soils**

***The Applicant's Revised Project would result in the same less-than-significant (no mitigation measures) geology and soils impacts as the Draft EIR Project.*** The Revised Project would involve similar overall construction, excavation and earthmoving activities as the Draft EIR Project and would be subject to the same geologic hazard conditions. As a result, the Revised Project would require adherence to the same regulatory requirements that ensure less-than-significant impacts.

### **Greenhouse Gases / Climate Change**

***The Applicant's Revised Project would result in similar less-than-significant GHG emissions impacts as the Draft EIR Project.*** This determination is based on the fewer peak-hour vehicle trips (33 percent fewer AM and PM trips) and daily vehicle trips (33 percent fewer) associated with the Revised Project compared to the Draft EIR Project; mobile emissions are the most substantial Greenhouse Gas (GHG) emissions source. This determination also factors in the Revised Project's lower service population associated with the reduced office development, which is approximately 33 percent less than with the Draft EIR Project (3,061 compared to 4,579 persons).

Considering the reduction in total daily vehicle trips and building floor area, the Revised Project would result in lower total GHG emissions compared to the Draft EIR Project. However, since the service population associated with the Revised Project would also be lower (3,061 compared to 4,579 persons), the Revised Project would result in a higher emissions per service population metric (2.79 MT CO<sub>2</sub>e/SP compared to 2.3 MT CO<sub>2</sub>e in the Draft EIR), as shown in **Table 2-3**, updated from page 4.6-22 of the Draft EIR. For the Revised Project, this takes into account GHG reductions resulting from the Revised Project's implementation of the City's Reach Code that requires all new development to (1) be all-electric with no natural gas infrastructure, (2) provide a minimum 5 kilowatt (KW) onsite solar photovoltaic (PV) system and (3) provide electric vehicle (EV) chargers for 10 percent of the total parking spaces. In addition, the Revised Project would be served by carbon-free electricity through Peninsula Clean Energy's ECO100 program, which provides 100 percent renewable and carbon-free energy.

The proposed Site Transportation Demand Management (TDM) Plan prepared by TJKM in 2022 for the Revised Project would achieve at least a 20.7 percent reduction in vehicle miles traveled (VMT) and associated GHG emissions (see Table 5-2 in Master Response #1 in Chapter 5, *Master Responses*, of this document; and see **Appendix B** to this document).<sup>1</sup>

With these reductions, total emissions associated with the Revised Project would not exceed the year 2030 significance threshold of 2.8 MT CO<sub>2</sub>e per service population, therefore the impact would be less-than-significant impact, same as for the Draft EIR Project. (Also see Table 5-2 in Master Response #1 in Chapter 5, *Master Responses*, of this document; and see Appendix A, *Comparative Air Quality and GHG Emissions*.)

Also, the Revised Project would not be in conflict with regulatory plans adopted for the purpose of reducing GHG emissions, same as identified the Draft EIR. Overall, the GHG impacts would remain less-than-significant, the same as the Draft EIR Project.

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<sup>1</sup> The Project Applicant's proposed *Site TDM Plan for the Harbor View Project (2022)* demonstrates a 22.0 percent reduction in the anticipated rate of VMT per employee (Appendix B to this document).

**TABLE 2-3  
 UPDATED DRAFT EIR TABLE 4.6-8 (MODIFIED)  
 GHG EMISSIONS INVENTORY FOR THE DRAFT EIR PROJECT AND  
 REVISED PROJECT**

Emission Source	Draft EIR Project Total Emissions (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
Area Sources	0.09 <u>0.06</u>	<0.01	0.00	0.10
Energy Sources	4,086.11	0.31	0.08	4,118.33
Mobile Sources	5,570.95	0.20	0.00	5,576.01
Solid Waste	222.72	13.16	0.00	551.77
Water and Wastewater	114.57	0.13	0.08	142.29
<b>Total</b>	<b>9,994.43</b>	<b>13.81</b>	<b>0.16</b>	<b>10,388.50</b>
Amortized Construction Emissions over 30 Years				<del>140.80</del> <u>150.87</u>
<b>Operation including Construction Total</b>				<del><b>10,538.30</b></del> <b><u>10,539.37</u></b>
Project level Significance Threshold				1,100
<b>Exceeds Significance Threshold?</b>				<b>Yes</b>
Service Population (4,579 employees)				4,579
<b>Total Project GHG Emissions by Service Population</b>				<b>2.3</b>
Project level 2020 Significance Threshold				4.6
<b>Exceeds 2020 Significance Threshold?</b>				<b>No</b>
Project level 2030 Significance Threshold				2.8
<b>Exceeds 2030 Significance Threshold?</b>				<b>No</b>

NOTE: Columns may not total precisely due to rounding.  
 SOURCE: ESA, 2018 (Appendix C)

Emission Source	Revised Project Total Emissions <sup>a</sup> (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
Area Sources	0.06	<0.01	<0.00	0.06
Energy Sources	1,970.6	0.21	0.04	1,987.0
Mobile Sources <sup>b,c</sup>	10,601.3	0.68	0.45	10,751.9
Solid Waste	151.1	8.9	<0.00	374.2
Water and Wastewater	91.4	0.14	0.08	118.9
<b>Total</b>	<b>12,814.4</b>	<b>9.95</b>	<b>0.57</b>	<b>13,232.1</b>
Amortized Construction Emissions over 30 Years				137.6
Required reduction from no natural gas per Redwood City Reach Code				-391.7
Required reduction from onsite solar per Redwood City Reach Code <sup>d</sup>				--
Required reduction from EV charging infrastructure per Redwood City Reach Code				-615.0
Reduction from zero carbon electricity committed to, as part of project				-1,595.3
<b>Total Project Emissions</b>				<b>10,767.8</b>
Service Population (3,061 employees)				3,061
<b>Project Emissions per Service Population</b>				<b>3.5</b>
Project level 2020 Significance Threshold				4.6
<b>Exceeds 2020 Significance Threshold?</b>				<b>No</b>
Project level 2030 Significance Threshold				2.8
<b>Exceeds 2030 Significance Threshold?</b>				<b>Yes</b>
Emissions Reduction needed from TDM Mitigation Measure				2,228
% Reduction in VMT needed from TDM Mitigation Measure				20.7
<b>Mitigated Project Emissions</b>				<b>8,540</b>
<b>Mitigated Project Emissions per Service Population</b>				<b>2.79</b>
<b>Exceeds 2030 Significance Threshold?</b>				<b>No</b>

NOTES:

- a) Emissions estimated using CalEEMod 2020.4.0 for first operational year of 2025.
- b) Includes emissions from increased trip generation based on the City's updated traffic methodology.
- c) Includes project-specific VMT adjustment based on a factor calculated by dividing VMT data provided by F&P for the Revised Project without ice rink with the default VMT estimated by CalEEMod (Table 1).
- d) Excludes GHG reduction from onsite solar to avoid double counting some of the reduction taking place through use of zero carbon electricity.

Columns may not total precisely due to rounding.

SOURCE: ESA, 2022

## **Hazards and Hazardous Materials**

***The Applicant's Revised Project would result in the same less-than-significant (with implementation of mitigation measures) hazards and hazardous materials impacts as the Draft EIR Project.*** The Revised Project would involve similar overall construction, excavation and earthmoving activities as the Draft EIR Project, including on areas where there may be hazardous conditions disturbed and transported during construction. Also, the Revised Project would be subject to the same potential hazards risk and conditions as the Draft EIR Project and would require adherence to the same mitigation measures and regulatory requirements that ensure less-than-significant impacts during construction and operations.

## **Hydrology and Water Quality**

***The Applicant's Revised Project would result in the same less-than-significant (with implementation of mitigation measures) hydrology and water quality impacts as the Draft EIR Project.*** The Revised Project would involve similar overall construction, excavation and earthmoving activities that could alter drainage patterns on the Project site, including relocating an existing storm drain main line and earthmoving activities in areas that may contain contaminants. The City's Eastern Low-Lying Area Drainage Master Plan improving the stormwater model and confirming that the Oddstad pump station, under existing conditions, does not have sufficient capacity for 30 year or 100 year storms. the percentage of pervious surface area would more under the Revised Project than under the Draft EIR Project (40percent compared to 25 percent), the effect on existing stormwater infrastructure is conservatively considered the same with the Draft EIR Project, and the same mitigation measures would continue to apply to the Revised Project. Also, the Revised Project would be subject to the same flood hazard conditions as the Draft EIR Project and would require adherence to the same regulatory requirements that ensure less-than-significant impacts during construction and operations.

## **Land Use and Planning**

***The Applicant's Revised Project would result in the same less-than-significant (no mitigation required) land use and planning impacts as the Draft EIR Project.*** The Revised Project proposes the same uses as the Draft EIR Project, and would require the same amendments to the General Plan Map and Zoning Map to adopt and apply a "Commercial Office Professional /Technology (CP)" land use designation and "Commercial Park (CP)" zoning district, respectively, to the Project site. As with the Draft EIR Project, the Revised Project would be compatible with the mix of nearby industrial uses (e.g., rail, truck, port, building supply and the Graniterock concrete processing). This scenario assumes that the buildings and parking structures would be located on the site in the same manner to provide some level of buffer between these surrounding uses and the new office campus. The Revised Project would not pose conflicts with other existing land use plans or policies. The impacts to land use and planning would be the same with the Revised Project as the Draft EIR Project.

## **Noise**

***The Applicant's Revised Project would result in reduced less-than-significant (with implementation of mitigation measures) construction noise impacts and reduced less-than-significant operational noise impacts compared to the Draft EIR Project.*** This determination considers that the Revised Project would construct about 68 percent of the building area proposed by the Draft EIR Project (800 ksf compared to 1.18 msf). This would not necessarily result in lower construction noise levels than those that would occur with the Draft EIR Project; however, the duration of construction activities would be less. Construction activities associated with the Revised Project would result in similar noise levels as the Draft EIR Project, and the same standard construction noise regulations and practices would apply. The Revised Project would result in a less-than-significant construction noise impact and the construction-period mitigation measures would still apply. Less-than-significant impacts regarding groundbourne vibration would also conservatively be the same as with the Draft EIR Project as the distance separating construction activities from nearby sensitive receptors would be the same as analyzed in the Draft EIR.

The Revised Project would also generate fewer peak-hour vehicle trips (33 percent fewer AM trips and PM trips), which would result in lower operational (traffic) noise compared to the Draft EIR Project. The smaller development would also have reduced groundbourne vibration during its operations. Overall, the Revised Project would have less-than-significant operational noise impacts with no mitigation measures required, which is the same as with the Draft EIR Project.

## **Population, Housing and Employment**

***The Applicant's Revised Project would result in reduced less-than-significant (no mitigation measures) population, housing and employment impacts compared to the Draft EIR Project.*** The Revised Project would develop less total building area than proposed by the Draft EIR Project (800 ksf compared to 1.18 msf), and therefore less service population (employees) (3,061 compared to 4,579). Like the Draft EIR Project, no aspect of the Revised Project would result in undue growth associated with infrastructure improvements, and there would be no displacement of housing or people. The Revised Project's impact would be less than significant, same as identified in the Draft EIR.

## **Public Services and Recreation**

***The Applicant's Revised Project would result in reduced less-than-significant (no mitigation measures) public services and recreation impacts compared to the Draft EIR Project.*** With less total building area, the Revised Project would generate less service population (fewer employees) than with the Draft EIR Project (3,061 compared to 4,579). As a result, to the extent that employees generate demand for public services - specifically police, fire and emergency services, schools, libraries and parks - the Revised Project would generate less demand for these services compared to the Draft EIR Project.

## **Transportation and Traffic**

***The Applicant's Revised Project would result in reduced significant traffic impacts (with implementation of mitigation measures) compared to the Draft EIR Project.***

Vehicle Delay / Level of Service (LOS). The development program of the Revised Project is about 68 percent of that for the Draft EIR Project (800 ksf compared to 1.18 msf). Therefore, the Revised Project would generate fewer daily and peak-hour vehicle trips (33 percent fewer AM, PM and daily trips) than the Draft EIR Project. (See Table 5-2 in Master Response #1 in Chapter 5, *Master Responses*, of this document). This means less traffic on area intersections and roadways compared to traffic with the Draft EIR Project. Nonetheless, many of the adversely affected intersection and freeway conditions nearby are substantially over-capacity under existing conditions, which would continue, even with fewer new trips generated by the Revised Project (as discussed in section 5.4, *Assumptions and Approach to the Comparative Analysis*, in the Draft EIR).

The Revised Project would also have the same less-than-significant (no mitigation measures required) transportation impacts regarding air traffic, transit, and pedestrian and bicycle considerations. Also, with exceptions specified in response to Comment 10-3 in Chapter 6, *Individual Comments and Responses*, and specified in Chapter 4, *Revisions to the Draft EIR*, of this document.<sup>2</sup>, the same significant and less-than-significant traffic and transportation impacts identified with the Draft EIR Project would continue to occur with the Revised Project, and the same mitigation measures identified for the Draft EIR Project would apply, even though the contribution of new traffic would be less than with the Draft EIR Project.

Vehicle Miles Traveled. VMT was originally calculated for the Draft EIR Project for informational purposes only (page 4.14-31 of the Draft EIR), and no impact was identified. A CEQA-level VMT analysis was not required to be included in an EIR when the Draft EIR was initiated (January 2018) or released for public review (January 2019).<sup>3</sup> California Senate Bill 743 (SB 743) was adopted in 2013 and directed the State of California's Office of Planning and Research (OPR) to look at different metrics for identifying transportation impacts and make corresponding revisions to the CEQA Guidelines.<sup>4</sup> Accordingly, OPR issued revised CEQA Guidelines for VMT in December 2018. Then in July 2020, the City of Redwood City adopted thresholds and specific guidance for VMT analysis and determination of significant impacts, consistent with SB 743, the OPR Guidance, and associated 2019 court rulings.<sup>5</sup> (See Master Response #1 in Chapter 5, *Master Responses*, of this document regarding the transition of VMT instead vehicle delay and LOS to determine environmental impacts.)

<sup>2</sup> Exceptions are Mitigation Measures TRANS-12A, TRANS-14A, and TRANS-28A that have been completed since publication of the Draft EIR; Mitigation Measures TRANS-2B, TRANS-8B, TRANS-23C and TRANS-25A that were inadvertently included in the Draft EIR even though they were identified as infeasible.

<sup>3</sup> The City issued a Notice of Preparation (NOP) for the Draft EIR on January 12, 2018, and issued a Notice of Completion (NOC) of the Draft EIR for public review on January 16, 2019.

<sup>4</sup> SB 743 adopted to change the way that transportation impacts are analyzed under CEQA. Under SB 743, the Office of Planning and Research (OPR) is tasked with developing new criteria for determining the significance of transportation impacts, including accessing vehicle miles traveled.

<sup>5</sup> *Citizens for Positive Growth & Preservation v. City of Sacramento* (43 Cal.App.5th 609 (2019)).

The Draft EIR Project’s VMT per employee was 25.9 and its estimated weekday daily VMT per employee was 88,900, which would have been considered a significant impact compared to the City’s subsequently adopted performance threshold for the proposed commercial development: daily VMT per employee does not exceed an average of 15.0 miles per day.<sup>6</sup> ~~The Project Applicant's initial Site TDM Plan for the Harbor View Project (Site TDM Plan) (February 2021), prepared after publication of the Draft EIR and~~

**TABLE 2-4**  
**UPDATED TABLE 4.14-8**  
**PROJECT GENERATED VMT ESTIMATES**

	Daily Vehicle Trips	Total Daily VMT Generated	Employee Estimate	VMT Per Employee
<b>Draft EIR Project</b>	8,090	88,990	3,434 <sup>a</sup>	25.9
<b>Revised Project <sup>b</sup></b>	8,717	95,889	3,061	31.3

<sup>a</sup> Employee estimates based on ITE Trip Generation estimates for employees per 1,000 square feet of office.

<sup>b</sup> Values are greater than the smaller Draft EIR Project due to updated employee density and average trip lengths applied to the Revised Project (see Master Response 3 in Chapter 5 of this Final EIR).

SOURCE: Fehr & Peers, 2018.

The Draft EIR did not discuss how implementation of the draft TDM Plan (Appendix F.5 to the Draft EIR) would reduce VMT. However, the Draft EIR did show how the draft TDM could achieve an up to 11 percent reduction (Draft EIR p. 4-14-87) in vehicle trips, as shown in **Table 2-5** below.

The estimated weekday daily VMT per employee of the Revised Project is 31.3 and its estimated weekday daily VMT of 95,889, both of which are higher than what was presented for the Draft EIR Project in the Draft EIR (see Table 5-2 in Chapter 5, *Master Responses*, of this document). Although the Revised Project has less floor area and generates fewer vehicle trips than the larger Draft EIR Project, its estimated VMT is greater due to updated employee density and average trip lengths applied to the Revised Project in this document (discussed in detail in Master Response #1 in Chapter 5, *Master Responses*). Mitigation Measure TRANS-3B (Implementation of a TDM Plan) identified in the Draft EIR would continue to apply to the Revised Project, and the Project Applicant's ~~updated~~ Site TDM Plan for the Revised Project would reduce estimated weekday daily VMT per employee by at least 20.7 percent (as discussed above in *Greenhouse Gases / Climate Change* and shown in Table 2-3).<sup>7</sup> Table 2-5 below shows how the Site TDM Plan for the Revised Project would reduce trip generation.

<sup>6</sup> Project Applicant's proposed *Site TDM Plan for the Harbor View Project* (2022) (Appendix B to this document), prepared pursuant to the City's *Transportation Analysis Manual (TAM)* (2020).

<sup>7</sup> The Project Applicant's proposed Site TDM Plan demonstrates a 22.0 percent reduction in the anticipated rate of VMT per employee (Appendix B to this document).

**TABLE 2-5**  
**UPDATED DRAFT EIR TABLE 4.14-24**  
**TRIP GENERATION WITH TDM PLAN**

	AM Peak Hour Trips	PM Peak Hour Trips
<b>Draft EIR Project</b>		
Net External Vehicle Trips <sup>a</sup>	1,254	1,282
With up to 11% draft TDM Plan Reduction <sup>b</sup>	1,106	1,141
<b>Revised Project</b>		
Net External Vehicle Trips <sup>c</sup>	1,010	826
With up to 20.7% Site TDM Plan Reduction	800	655

<sup>a</sup> Draft EIR Table 4.14-7, corrected in response to comment 10-6 in Chapter 6 of this Final EIR.  
<sup>b</sup> Appendix F.5 to the Draft EIR  
<sup>c</sup> See Table 5-2 in Chapter 5 of this Final EIR.

Implementation of the Site TDM Plan, with its annual monitoring required by Mitigation Measure TRANS-3B for effectiveness, would reduce the Revised Project's VMT to a less than significant level.

While LOS is no longer used to determine CEQA impacts, the Project Applicant will continue to implement or provide their fair-share to the LOS-related measures identified in the Draft EIR, as modified above, in addition to the VMT-related mitigation measure. Overall, the potential impacts to transportation would remain the same as with the Draft EIR Project.

### **Utilities and Service Systems**

*The Applicant's Revised Project would result in reduced less-than-significant (no mitigation measures) utilities and service services impacts compared to the Draft EIR Project.* The Revised Project would develop less total building area than proposed by the Draft EIR Project (800 ksf compared to 1.18 msf). Also, the Revised Project would generate less service population (fewer employees) than with the Draft EIR Project (3,061 compared to 4,579). As a result, the Revised Project would generate less overall demand for water and sewer service utilities than identified for the Draft EIR Project. The Revised Project would continue to comply with all regulations regarding water quality, recycled water usage, and drainage effects.

The assessment of water supply facilities in the Draft EIR relied on a 2015 water supply assessment (WSA) that had been conducted but not approved for the 2015 Harbor View Project, a larger development considered on the current project site compared to Draft EIR Project (Draft EIR p. 4.13-13). The 2015 WSA determined that the total potable water demand of the Draft EIR Project was approximately 36.4 acre feet per year (af/yr), and that the proposed development fit within the development projections established in the City's 2015 Urban Water Management Plan (UWMP). Therefore, the City would have sufficient existing water supplies to meet the expected



future water demand of the Draft EIR Project. The Draft EIR Project was estimated to not exceed the City's existing water supplies. The impact was identified as less than significant.

The Engineering Division of the City's Public Works Services Department prepared a Final WSA for the Revised Project (**Appendix C** to this document). As shown in **Table 2-6** below, the Final WSA confirms that the total potable water demand of the Revised Project was approximately 26.2 af/yr and is included in the City's updated 2020 UWMP. Moreover, Redwood City has sufficient supply for the Revised Project in normal and dry years, both with and without future implementation of the 2018 Bay-Delta Plan Amendment.<sup>8</sup> The impact would remain less than significant, same as determined in the Draft EIR.

**TABLE 2-6**

**NEW FIGURE 4.13-1  
REVISED PROJECT WATER DEMAND (AFY)**

	<b>Existing Demand</b>	<b>Proposed Project Demand</b>	<b>Potable Demand</b>	<b>Recycled Demand</b>	<b>Net New Potable Demand</b>
Commercial <sup>a</sup>	0.0	131.0	26.2	104.8	26.2
Irrigation	0.0	26.7	0.0	26.7	0.0
<b>Total</b>	<b>0.0</b>	<b>157.7</b>	<b>26.2</b>	<b>131.5</b>	<b>26.2</b>

<sup>a</sup> Potable water for Commercial uses is 20% of Proposed Project Demand, Recycled Water is 80% of Proposed Project Demand.

SOURCE: City of Redwood City, Public Works Services Department, 2022

Also, the Revised Project would conduct the same utility infrastructure improvements described in the Draft EIR. These include replacing the existing 8" domestic water line with a 20" domestic water line from the westerly property frontage to the intersection of Seaport Blvd. and Blomquist Street, and relocating the sanitary sewer main line that runs through the project site. This project is also considered a part of the East 101 Fair Share Infrastructure Plan to develop utility related infrastructure in those areas East of U.S. 101, this includes contribution to regional projects for water mains, a water tank, and a water pump station. The Revised Project impacts would remain less-than-significant, as with the Draft EIR Project, albeit reduced.

<sup>8</sup> In December 2018, the State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. It requires the release of 40 percent of the "unimpaired flow" in three San Joaquin River tributaries from February through June in every year type, whether wet, normal, dry, or critically dry. If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet the projected water demands presented in this Urban Water Management Plan (UWMP) in normal years but would experience supply shortages in single dry years or multiple dry years. Implementation of the Bay-Delta Plan Amendment will require rationing in certain years. Implementation of the Plan Amendment is uncertain for several reasons. (See Appendix C to this Final EIR.)

## CHAPTER 3

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# Description and Analysis of the No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative

### 3.1 Introduction

This chapter describes and presents the analysis of an additional no project alternative. This alternative is a variation of the No Project – Existing Zoning 70/30 R&D Lab + Ancillary R&D Office Alternative analyzed in Chapter 5, *Alternatives*, of the Draft EIR, and reflects the maximum mix of uses permitted by existing zoning: 50 percent Research and Development (R&D) Laboratory and 50 percent ancillary R&D Office.

### 3.2 Description and Analysis of the No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative

The “50/50” No Project/Existing Zoning Alternative reflects an alternative scenario by which development could occur on the Project site under its existing zoning designation, which would provide 50 percent R&D/Laboratory and 50 percent ancillary R&D Office. The majority of the Project site is within the Industrial Restricted (IR) zoning designation, which is the basis for this alternative.<sup>1</sup>

As shown in **Table 3-1**, this alternative assumes the development of two buildings, one is 412,911 square feet of R&D/Laboratory use (50 percent) and the other is 412,911 square feet of ancillary R&D Office use (50 percent), for a total floor area of 825,823 square feet on the Project

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<sup>1</sup> The IR zone applies to 94 percent of the 27.08-acre Project site and to adjacent areas west and north of the Project site. The General Industrial (GI) zone applies to the remaining 6 percent of the Project site — the northeast most corner.

site. Land uses and development standards allowed by the IR zoning apply.<sup>2,3</sup> Because only two buildings would be constructed on the site, this alternative assumes that the taller of the two parking structures of the Draft EIR Project (Parking Structure A on the west edge of the site) would not be developed, and that this alternative would include more surface parking instead of a second parking structure. Considering the maximum floor area ratio (FAR) allowed, the two buildings developed with this alternative would be approximately two to three stories tall compared to the four seven-story office buildings with the Draft EIR Project.

### 3.3 Analysis and Comparison of the Draft EIR Project and the “50/50” No Project/Existing Zoning Alternative

Table 3-1 provides a side-by-side comparison of principal project characteristics of the Draft EIR Project and the “50/50” No Project/Existing Zoning Alternative.

**TABLE 3-1  
COMPARISON OF THE DRAFT EIR PROJECT AND THE “50/50” NO PROJECT/EXISTING ZONING ALTERNATIVE**

	Draft EIR Project	“50/50” No Project/Existing Zoning Alternative
Office (sf)	1,144,748	-
R&D/Laboratory (sf)	-	412,911
R&D Office (sf)		412,911
Amenities Building (sf)	35,000	-
Total Square Footage (sf)	1,179,748	825,823
# of Primary Buildings / Parking Structures	4 / 2	2 / 1
Total Site Acreage	27.08	27.08
Service Population	4,579	2,672
<i>Net Change from Draft EIR Project</i>	-	<b>-1,907 employees</b>
Peak Hour AM/PM (Daily) Trip Generation	1,511 AM / 1,236 PM (13,042 Daily)	898 AM / 890 PM (6,201 Daily)
<b>Net Change from Draft EIR Project</b>	-	<b>-613 AM / -346 PM (-6,841 Daily)</b>

<sup>2</sup> Article 2.2 (*Definitions*) of the Redwood City Zoning Code defines “Research and Development, Laboratory Type” as a use for which the R&D components require substantial laboratory space and/or other equipment for testing or development, which may also include associated adjacent or nearby workstations for recording or preparing written documentation of research. Typical R&D Lab uses may include, but are not limited to, biotechnical firms and pharmaceutical research laboratories. The Zoning Code defines “Research and Development, Office Type” as a use for which the R&D components primarily occur in an office setting, with minimal laboratory area or research equipment, other than computers and other related electronic equipment. Typical office type research and development uses may include, but are not limited to, computer software and computer simulation firms.

<sup>3</sup> 27.08 acres equals 1,179,747 square feet of site area, multiplied by a 0.7 FAR per the IR zoning, totals approximately 825,823 square feet of building area, 50 percent of which is approximately 412,911 square feet of R&D Lab use, and 50 percent of which is approximately 412,911 square feet of R&D Office use.

**Table 3-2** lists the environmental impact determinations for the “50/50” No Project/Existing Zoning Alternative and the Draft EIR project. A narrative discussion of each impact area follows the table.

**TABLE 3-2  
IMPACT COMPARISON OF THE DRAFT EIR PROJECT AND THE 50/50 NO PROJECT/EXISTING  
ZONING PROJECT**

	Draft EIR Project	No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative
4.1 Aesthetics	LS	LS↓
4.2 <sup>a</sup> Air Quality (Construction)	LSM	LSM↓
Air Quality (Operations)	LS	LS↓
4.3 Biological Resources	LSM	LSM
4.4 Cultural / Tribal Resources	LSM	LSM
4.5 Geology and Soils	LS	LS
4.6 Greenhouse Gases / Climate Change	LS	LS
4.7 Hazards / Hazardous Materials	LSM	LSM
4.8 Hydrology and Water Quality	LSM	LSM
4.9 Land Use and Planning	LS	LS↓
4.10 Noise (Construction)	LSM	LSM↓
Noise (Operations)	LS	LS↓
4.11 Population, Housing and Employment	LS	LS↓
4.12 Public Services / Recreation	LS	LS↓
4.13 Utilities / Service Systems	LS	LS↓
4.14 Transportation / Traffic	SU	SU↓

<sup>a</sup> The Draft EIR identified a SU cumulative air quality impact only. The Draft EIR Project would not exceed project-level significance thresholds for construction or operational criteria pollutant emissions, with the implementation of construction mitigation measures. Therefore, the Draft EIR’s contribution to the cumulative impact for regional air quality impacts is not considerable, and its contribution to any cumulative air quality impacts is less than significant.

**NOTES:** Impacts shown for most severe impact under each environmental topic.

LS Less than significant; no mitigation required

LSM Less than significant impact after implementation of all feasible mitigation measures

SU Significant and Unavoidable after implementation of all feasible mitigation measures

↑↓ Impact is more severe (↑) or less severe/reduced (↓) compared to the Draft EIR Project impact, but with no change in impact determination.

**Bold** means the Revised Project impact determination is different from the Draft EIR Project impact.

**Shading** means the *degree* of impact is substantially different from the Draft EIR Project impact.

## **Aesthetics**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (no mitigation required) aesthetics impacts as the Draft EIR Project.*** The two buildings developed with this alternative would be approximately two to three stories tall compared to the four seven-story office buildings with the Draft EIR Project. As a result,

development with this alternative would be less visible from public viewpoints compared to the Draft EIR Project development.

This analysis does not assume that relatively lower building height or less visibility necessarily means a less adverse environmental effect than with the Draft EIR Project. In particular, this alternative would not adversely affect the existing visual character or visual quality of the area any more than the Draft EIR Project would, given that the existing site surroundings are a mix of industrial, office and port-related activities and development in which the low-rise building and R&D use fits. However, the reduced overall development and building heights with this alternative would have less reduced effect on shadow and light/glare compared to the Draft EIR Project, but those effects would remain less than significant.

### **Air Quality**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (with implementation of mitigation measures) construction air quality impact, and reduced less-than-significant operational air quality emission impacts, compared to the Draft EIR Project.*** This determination considers that this alternative would allow construction of about 70 percent of the building area proposed for the Draft EIR Project (826 ksf compared to 1.18 msf). This would result in less construction activity than would occur with the Draft EIR Project, which would therefore result in relatively fewer criteria air pollutant emissions during construction. However, the less-than-significant impact and the construction-period mitigation measures addressing criteria pollutants would conservatively still apply with this alternative. Less-than-significant impacts regarding construction odors and toxic air contaminants TACS would be the same as with the Draft EIR Project.

This alternative would generate fewer peak-hour and daily vehicle trips (41 percent fewer AM trips, 28 percent fewer PM trips, and 52 percent fewer daily trips) than the Draft EIR Project, which would result in lower operational emissions compared to the Draft EIR Project. Therefore, operational air quality impacts associated with this alternative would remain less-than-significant, and no mitigation measures would be required, the same as the Draft EIR Project.

### **Biological Resources**

***The “50/50” No Project/Existing Zoning Alternative would result in the same less-than-significant (with implementation of mitigation measures) biological resources impacts as the Draft EIR Project.*** This alternative would involve less development than the Draft EIR Project, with the construction of two buildings and one parking structures (instead of four main buildings and two parking structures). The Project site is not located near any areas of existing sensitive habitat or wetlands, therefore neither the alternative nor the Draft EIR Project would involve construction or operations near such areas. However, all mitigation measures to address potential impacts to nesting birds, roosting bats and avian collisions and protected trees would continue to apply to this alternative, and the resulting impacts would remain less than significant, as identified for the Draft EIR Project.

### **Cultural / Tribal Resources**

*The “50/50” No Project/Existing Zoning Alternative would result in the same less-than-significant (with implementation of mitigation measures) cultural and tribal resources impacts as the Draft EIR Project.* This alternative would involve similar overall construction and excavation activities as the Draft EIR Project, which would require the same standard mitigation measures to address the potential discovery of archaeological and paleontological resources and human remains. No historic resources are present on the site that could be potentially affected.

### **Geology and Soils**

*The “50/50” No Project/Existing Zoning Alternative would result in the same less-than-significant (no mitigation measures) geology and soils impacts as the Draft EIR Project.* This alternative would involve similar overall construction, excavation and earthmoving activities as the Draft EIR Project and would be subject to the same geologic hazard conditions. As a result, this alternative would require adherence to the same regulatory requirements that ensure less-than-significant impacts.

### **Greenhouse Gases / Climate Change**

*The “50/50” No Project/Existing Zoning Alternative would result in similar less-than-significant GHG emissions impacts as the Draft EIR Project.* This alternative would generate substantially fewer peak-hour trips (41 percent fewer AM trips, 28 percent fewer PM trips, and 52 percent fewer daily trips) compared to the Draft EIR Project. Adjusting mobile emissions for this alternative relative to this decrease in vehicle trips, and adjusting for this alternative’s building area, the GHG emissions for this alternative is 6,045 MT CO<sub>2</sub> per year. With a service population of 2,672, emissions per service population would be 2.3 MT CO<sub>2</sub>e /per service population, which is the same as for the Draft EIR Project and would not exceed the 2030 significance thresholds of 2.8 MT CO<sub>2</sub>e. Like the Draft EIR Project, this alternative would not be in conflict with regulatory plans adopted for the purpose of reducing GHG emissions. Overall, the GHG impacts would remain less-than-significant, the same as the Draft EIR Project.

### **Hazards and Hazardous Materials**

*The “50/50” No Project/Existing Zoning Alternative would result in the same less-than-significant (with implementation of mitigation measures) hazards and hazardous materials impacts as the Draft EIR Project.* This alternative would involve similar overall construction, excavation and earthmoving activities as the Draft EIR Project, including relocating an existing storm drain main line and earthmoving activities on areas where there may be hazardous conditions disturbed and transported during construction. The City’s Eastern Low-Lying Area Drainage Master Plan improving the stormwater model and confirming that the Oddstad pump station, under existing conditions, does not have sufficient capacity for 30 year or 100 year storms. Also, the alternative would be subject to the same potential hazards risk and conditions as the Draft EIR Project and would require adherence to the same mitigation measures and

regulatory requirements that ensure less-than-significant impacts during construction and operations.

### **Hydrology and Water Quality**

***The “50/50” No Project/Existing Zoning Alternative would result in the same less-than-significant (with implementation of mitigation measures) hydrology and water quality impacts compared to the Draft EIR Project.*** This alternative would involve similar overall construction, excavation and earthmoving activities that could alter drainage patterns on the Project site, including in areas that may contain contaminants. The effect on existing stormwater infrastructure is conservatively considered the same as with the Draft EIR Project, and the same mitigation measures would continue to apply to this alternative. This alternative involves fewer buildings to be constructed, which may provide opportunities for additional pervious area on the site, which may actually reduce the potential adverse effects to water quality. Also, the alternative would be subject to the same flood hazard conditions as the Draft EIR Project and would require adherence to the same regulatory requirements that ensure less-than-significant impacts during construction and operations.

### **Land Use and Planning**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (no mitigation required) land use and planning impacts as the Draft EIR Project.*** This alternative proposes development consistent with the zoning and General Plan, which would develop a mix of R&D Lab with ancillary R&D Office uses, which would be compatible with the mix of nearby industrial uses (e.g., rail, truck, port, building supply and the Graniterock concrete processing facility). A General Plan Amendment would not be required, however, the Draft EIR Project’s requirement for a General Plan Amendment was not identified as a significant impact. This scenario assumes that the buildings and parking structure would be located on the site to provide some level of buffer between the existing nearby mix of industrial uses and the new R&D campus, although the extent of buffering warranted would be less than between the Draft EIR Project and the existing uses. Moreover, with less office floor area proposed with this alternative, the parking structure may not be necessary. Overall, like the Draft EIR Project, the alternative would not pose conflicts with other existing land use plans or policies, but the potential conflict between the existing and proposed land uses would be less than would occur with the Draft EIR Project. Therefore, while the impacts to land use and planning would be the same with this alternative as the Draft EIR Project, they would be reduced.

### **Noise**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (with implementation of mitigation measures) construction noise impacts, and reduced less-than-significant operational noise impacts, compared to the Draft EIR Project.*** This determination considers that this alternative would construct about 70 percent of the building area proposed for the Draft EIR Project (826 ksf compared to 1.18 msf). This would not necessarily result in less construction noise levels than would occur with the Draft EIR Project;

construction activities would be the same as with the Draft EIR Project, as would the standard construction noise regulations and practices. However, the alternative could have a shorter construction duration, but the less-than-significant impact and the construction-period mitigation measures would conservatively still apply with this alternative. Less-than-significant impacts regarding groundbourne vibration would be the same as with the Draft EIR Project.

This alternative would also generate substantially fewer peak-hour vehicle trips (41 percent fewer AM trips and 28 percent fewer PM trips) and fewer daily vehicle trips (52 percent fewer), which would result in lower operational (traffic) noise compared to the Draft EIR Project. The smaller development would also have reduced groundbourne vibration during its operations. Overall, the alternative would have less-than-significant operational noise impacts with no mitigation measures required, which is the same as with the Draft EIR Project.

### ***Population, Housing and Employment***

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (no mitigation measures) population, housing and employment impacts as the Draft EIR Project.*** This alternative would develop less building area than proposed for the Draft EIR Project (826 ksf compared to 1.18 msf), with a mix of R&D Lab with ancillary R&D Office uses. Overall employment with this alternative would be substantially less than the Draft EIR Project (2,672 compared to 4,579, or 41 percent fewer).<sup>4</sup>

Although less than the Draft EIR Project, the overall employment with this alternative would still be more than that anticipated by the General Plan for this site which was anticipated to be 1,911. Regardless, the growth increase would not require extension of new infrastructure into areas not previously served by utilities or anticipated by the City, as reported in the Draft EIR. Less employment largely results in comparable reductions in other effects (e.g., utility and public service demands). Also, like the Draft EIR Project, no aspect of this alternative would result in undue growth associated with infrastructure improvements, and there would be no displacement of housing or people.

### ***Public Services and Recreation***

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (no mitigation measures) public services and recreation impacts as the Draft EIR Project.*** This alternative would generate fewer employees than the Draft EIR Project (2,672 compared to 4,579, or 41 percent fewer). As a result, compared to the Draft EIR Project, the demand for public services, specifically police, fire and emergency services, schools, libraries and parks would be reduced with this alternative, as would the potential use of park facilities. The impacts would be reduced less-than-significant effects as the Draft EIR Project.

<sup>4</sup> 412,911 square feet of R&D Office use at 250 employees per building area (1,652 employees), plus 412,911 square feet of ancillary R&D Lab use at 405 employees per building area (1,020 employees), totals 2,672 employees (USGBC, 2008).



### **Transportation and Traffic**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced significant traffic impacts (with implementation of mitigation measures) compared to the Draft EIR Project.*** The development program of this alternative is about 70 percent of that for the Draft EIR Project (826 ksf compared to 1.18 msf). Therefore, this alternative would also generate fewer peak-hour vehicle trips (41 percent fewer AM trips and 28 percent fewer PM trips) and fewer daily vehicle trips (52 percent fewer) than the Draft EIR Project. This means less traffic on area intersections and roadways compared to traffic with the Draft EIR Project. Nonetheless, many of the adversely affected intersection and freeway conditions nearby, specifically within the Woodside Avenue (SR-84) corridor, are substantially over-capacity under existing conditions, and that situation would continue under even relatively minimal new trips (as discussed in section 5.4, *Assumptions and Approach to the Comparative Analysis*, in the Draft EIR).

The alternative would also have the same less-than-significant (no mitigation measures required) transportation impacts regarding air traffic, transit, and pedestrian and bicycle considerations. Also, the same significant and less-than-significant traffic and transportation impacts identified with the Draft EIR Project would continue to occur with this alternative and the same mitigation measures identified for the Draft EIR Project would apply, even though the contribution of new traffic would be less than with the Draft EIR Project.

### **Utilities and Service Systems**

***The “50/50” No Project/Existing Zoning Alternative would result in reduced less-than-significant (no mitigation measures) utilities and service system impacts as the Draft EIR Project.*** This alternative would develop less building area than proposed for the Draft EIR Project (826 ksf compared to 1.18 msf). Also, this alternative will generate less service population (fewer new employees) than with the Draft EIR Project (2,672 compared to 4,579, or 41 percent fewer). As a result, the alternative would generate less overall demand for water and sewer utilities than identified for the Draft EIR Project. The alternative would continue to comply with all regulations regarding water quality, recycled water usage, and drainage effects, and the impact would be less than significant, like for the Draft EIR Project.

## CHAPTER 4

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# Revisions to the Draft EIR and Summary of Impacts and Mitigation Measures and Policies

### 4.1 Introduction

This chapter presents a revised version of the impacts and mitigation measures table that was presented in the Draft EIR, and a revised version of the table of Project consistency with Redwood City General Plan land use policies and other regulations or plans presented in the Draft EIR. This chapter also presents discrete revisions to text in the Draft EIR that are made in response to comments in Chapters 6 and 7 of this Final EIR and also shown in those chapter in the context of the response to individual comments. The text revisions are presented in the order that the change would appeared in the Draft EIR.

All text changes are shown by either a line through the text that has been deleted, or are underlined where new text has been inserted. The revisions contain clarification, amplification, and corrections that have been identified since publication of the Draft EIR and reflects the Applicant's proposed Revised Project. The text revisions do not result in a change in the conclusions presented in the Draft EIR.

### 4.2 Revised Summary Tables

Starting on page 4-3 is **Table 4-1**, a revised version of the summary of impacts and mitigation measures table that was presented as Table 2-2 in the Draft EIR. Starting on page 4-31 is **Table 4-2**, the updated version of the Project's consistency with General Plan land use policies and other regulations or plans that was presented as Table 4.9-1 in the Draft EIR.

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**FINAL EIR TABLE 4.1**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.1 Aesthetics</b>		
<b>Impact AES-1:</b> The Project would not have a substantial adverse effect on a scenic vista. (Criterion a). (Less than Significant)	None Required.	
<b>Impact AES-2:</b> The Project would not degrade the existing visual character or quality of the site and its surroundings. (Criterion c). (Less than Significant)	None Required.	
<b>Impact AES-3:</b> The Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. (Criterion d). (Less than Significant)	None Required.	
<b>Impact AES-4:</b> The Project would not (1) Introduce landscape that would now or in the future cast substantial shadows on existing solar collectors; (2) Cast shadows that substantially impair the beneficial use of shadow-sensitive public open space; (3) Cast shadows that substantially impair the beneficial use of these residential parcels; and could (4) Cast shadows that substantially impair the viability of a sensitive natural habitat. (Criterion e). (Less than Significant)	None Required.	
<b>Impact AES-1.CU:</b> The Project, in combination with cumulative development in the Project vicinity and citywide, would not result in significant cumulative impacts to aesthetics. (Less than Significant)	None Required.	
<b>4.2 Air Quality</b>		
<b>Impact AIR-1:</b> Construction activities associated with the Project would generate fugitive dust and criteria air pollutants, and exceed the BAAQMD significance threshold for construction criteria air pollutant NOx (Criterion b). (Potentially Significant)	<p><b>Mitigation Measure AIR-1A:</b> Implement BAAQMD Basic Construction Mitigation Measures.</p> <p>The Project sponsor shall require construction contractors to implement the following applicable BAAQMD Basic Construction Mitigation Measures to reduce emissions of fugitive dust and equipment exhaust:</p> <ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>• 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.</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 mph.</li> <li>• 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.</li> </ul>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.2 Air Quality (cont.)</b>		
<b>Impact AIR-1 (cont.)</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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 BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul>	
	<p><b>Mitigation Measure AIR-1B:</b> Implement BAAQMD additional construction mitigation measures.</p> <ul style="list-style-type: none"> <li>• The Project sponsor shall require construction contractors to implement the following measures, recommended for projects with construction emissions above significance thresholds to further reduce fugitive dust and exhaust emissions.</li> <li>• All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.</li> <li>• All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</li> <li>• Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.</li> <li>• Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.</li> <li>• The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.</li> <li>• All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</li> <li>• Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.</li> </ul>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.2 Air Quality (cont.)</b>		
<b>Impact AIR-1 (cont.)</b>	<ul style="list-style-type: none"> <li>• Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.</li> <li>• Minimizing the idling time of diesel powered construction equipment to two minutes.</li> <li>• The Project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.</li> <li>• Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</li> <li>• Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. Compliance with this measure requires that constructors use off-road equipment that have engines that meet or exceed CARB Tier 4 off-road emission standards which have the lowest NOx and PM emissions of commercially available equipment.</li> <li>• Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.</li> </ul>	
	<p><b>Mitigation Measure AIR-1C:</b> Use of Renewable Diesel Fuel during Construction.</p> <p>The Project sponsor shall require construction contractors to ensure that all diesel powered off-road construction equipment shall be fueled with renewable diesel, which has been demonstrated to reduce NOx emissions by approximately 10 percent (Tanikawa, 2015).</p>	Less than Significant
<b>Impact AIR-2:</b> Construction activities associated with the Project would generate toxic air contaminants (TACs), including diesel particulate matter (DPM), but would not expose sensitive receptors to substantial pollutant concentrations (Criterion d). (Less than Significant)	None Required.	
<b>Impact AIR-3:</b> The Project would not create objectionable odors that would affect a substantial number of people during construction (Criterion e). (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.2 Air Quality (cont.)</b>		
<b>Impact AIR-4:</b> The Project would not conflict with, or obstruct implementation of the <i>2017 Clean Air Plan</i> (Criterion a). (Less than Significant)	None Required.	
<b>Impact AIR-5:</b> The Project would result in emissions of criteria air pollutants, but not at levels that could violate an air quality standard, or contribute to an existing or projected air quality violation (Criterion b). (Less than Significant)	None Required.	
<b>Impact AIR-6:</b> The Project operations would generate toxic air contaminants (TACs), including diesel particulate matter, and carbon monoxide exposure, but would not expose sensitive receptors to substantial air pollutant concentrations (Criterion d). (Less than Significant)	None Required.	
<b>Impact AIR-7:</b> The Project would not create objectionable odors that would affect a substantial number of people (Criterion e). (Less than Significant)	None Required.	
<b>Impact AIR-1.CU:</b> Development of the Project, combined with cumulative development citywide, would result in cumulative air quality impacts (Criterion c). (Significant)	<b>Mitigation Measure AIR-1.CU:</b> Implement <b>Mitigation Measures AIR-1A, AIR-1B, and AIR-1C.</b>	Significant and Unavoidable
<b>4.3 Biological Resources</b>		
<b>Impact BIO-1:</b> The Project could adversely affect, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (Criterion a). (Potentially Significant)	<p><b>Mitigation Measure BIO-1a:</b> Noise Impacts from Pile Driving</p> <p>The avoidance and minimization measures specific to pile driving activity, below, have been developed in accordance with the majority of the measures outlined in the 2013 NLAA program criteria, in order to reduce Project effects on sensitive resources. In coordination with the City of Redwood City, a NMFS approved biological monitor will conduct daily surveys before and during any impact hammer pile driving to inspect the work zone and adjacent waters for marine mammals. The monitor will be present as specified by NMFS during the impact pile driving phases of construction. If no in-water activity is proposed, biological monitoring would not be required. Avoidance and minimization measures that will reduce Project noise effects, including the following, shall be implemented to the satisfaction of the City:</p> <ul style="list-style-type: none"> <li>To the extent feasible all piles (30-inch and 66-inch) will be installed using a vibratory hammer. Vibratory pile installation will be conducted in accordance with the USACE's "Proposed Additional Procedures and Criteria for Permitting Projects Under a Programmatic Determination of Not Likely to Adversely Affect Select Listed Species in California."</li> </ul>	Less than Significant

<sup>1</sup> U.S. Army Corps of Engineers Proposed Procedures and Criteria for Permitting Projects Under a Programmatic Determination of Not Likely to Adversely Affect Select Listed Species or Critical Habitat

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources</b>		
<p><b>Impact BIO-1 (cont.)</b></p>	<ul style="list-style-type: none"> <li>• <del>Construction-related sound exposure shall be limited to 206 dB peak and 187 dB accumulated SEL for all listed fish weighing two grams or more. Conditions during all pile driving shall be monitored at approximately 33 feet (10 meters) for the first five piles driven or for two full days of pile driving, whichever is greater, to ensure that sound pressure levels comply with the sound thresholds. In the event of use of an impact hammer, or observed exceedance of the sound thresholds, a cushion, bubble curtain, jetting, or other sound attenuation method will be utilized to reduce sound levels. If sound level criteria are still exceeded with the use of attenuation methods, the contractor will revise sound attenuation methods and monitor an additional five piles or for two days of driving, whichever is greater, until demonstration of compliance is obtained, and the demonstrated methods shall be used for the remainder of the pile driving.</del></li> <li>• <del>If attenuation methods fail to reduce sound levels below NMFS thresholds for marine mammal harassment (160 dB root mean square sound pressure level [RMS] or greater for impulse sounds [e.g., impact pile driving] and 120 dB RMS for continuous noise [e.g., vibratory pile driving]), a 1,600-foot (500 meter) open-water safety zone shall be maintained. At the discretion of the resource agencies (USACE and NMFS in particular), the size or configuration of the marine mammal safety zone may change based on the findings of sound attenuation monitoring that will be performed during pile driving.</del></li> <li>• <del>Work activities shall be halted when a marine mammal enters the 1,600-foot safety zone and resume only after the animal has been gone from the area for a minimum of 15 minutes.</del></li> <li>• <del>A “soft start” technique shall be employed when initiating impact pile driving to provide marine mammals the opportunity to vacate the area.</del></li> </ul> <p><b>Mitigation Measure BIO-1b: Seasonal Avoidance for Aquatic Species</b></p> <p><del>This measure applies only to pile driving activities that are performed within aquatic habitat. Pile driving will be conducted within seasonal work windows identified to reduce potential impacts on special status species (i.e., work will be conducted from June 1 – November 30). If any in-water work is proposed during the Pacific herring spawning or hatching season (December 1 – February 28), a CDFW approved herring monitor will monitor the Project site daily, and at any time when in-water construction activity is taking place.</del></p> <p><del>In the event that the on-site monitor detects herring spawning at, or within 200 meters of in-water construction activity, the in-water construction activity will be shut down for a minimum of 14 days, or until the monitor determines that the hatch has been completed and larval herring have left the site. The in-water activity may resume thereafter.</del></p>	



**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources</b>		
<b>Impact BIO-1 (cont.)</b>	<p><b>Mitigation Measure BIO-1c: Nesting Bird Measures</b></p> <p>The Project applicant shall conduct pre-construction nesting bird surveys for areas containing, or likely to contain, habitat for nesting birds prior to any bridge construction, tree removal, grading or construction. The City shall require the Project applicant to implement specific measures to avoid and minimize impacts on nesting birds including, but not limited to those described below.</p> <ul style="list-style-type: none"> <li>• To the extent practicable, construction activities including building demolition, vegetation and tree removal, and new site construction shall be performed between September 1 and January 31 in order to avoid the avian nesting season. If these activities cannot be performed during this period, a preconstruction survey for nesting birds shall be conducted by a qualified biologist.</li> <li>• During the avian nesting season (February 1 through August 31), a qualified biologist shall survey construction areas within and in the vicinity of the Project site for nesting raptors and passerine birds not more than 14 days prior to any ground-disturbing activity or vegetation removal. Surveys shall include all potential habitats within 500 feet (for raptors) of activities and all on-site vegetation including bare ground within 250 feet of activities (for all other species). These buffer distances may also be modified if obstacles such as buildings or trees obscure the construction area from active bird nests, or existing disturbances create an ambient background disturbance similar to the proposed disturbance.</li> <li>• If active nests are found either within the Project site or within the 500-foot survey buffer surrounding the Project site, no-work buffer zones shall be established around the nests in coordination with CDFW. No demolition, vegetation removal, or ground-disturbing activities shall occur within a buffer zone until young have fledged or the nest is otherwise abandoned as determined by the qualified biologist. If work during the nesting season stops for 14 days or more and then resumes, then nesting bird surveys shall be repeated, to ensure that no new birds have begun nesting in the area.</li> <li>• Typically, the size of individual buffers ranges from a minimum of 250 feet for raptors to a minimum of 50 feet for other birds but can be adjusted based on an evaluation of the site by a qualified biologist in cooperation with the USFWS and/or CDFW.</li> <li>• Birds that establish nests after construction starts are assumed to be habituated to and tolerant of the indirect impacts resulting from construction noise and human activity. However, direct take of nests, eggs, and nestlings is still prohibited and a buffer must be established to avoid nest destruction.</li> </ul> <p>Results of any survey shall be forwarded to CDFW (if results are positive for nesting birds) and avoidance procedures shall be adopted, if necessary, on a case-by-case basis. These may include construction buffer areas (up to several hundred feet in the case of raptors) or seasonal avoidance.</p>	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources (cont.)</b>		
<b>Impact BIO-1 (cont.)</b>	<p><b>Mitigation Measure BIO-1d:</b> Protection of Roosting Bats</p> <p>The Project applicant shall take the following steps to avoid direct losses of maternity roosts, winter roosts, or individual bats and indirect impacts to bat breeding success:</p> <ul style="list-style-type: none"> <li>• Prior to construction or demolition activities within 250 feet of trees/structures with at least a moderate potential to support special-status bats, a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with the CDFW allowing the biologist to handle and collect bats) shall survey for bats. If no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required.</li> <li>• If bats raising pups are present within 250 feet of the Project site during project construction activities (typically April 15 through August 15), the project sponsor shall create a no-disturbance buffer acceptable in size to the CDFW around the bat roosts. Bat roosts initiated within 250 feet of the Project site after construction has already begun are presumed to be unaffected by project-related disturbance, and no buffer would be necessary. However, the “take” of individuals (e.g., direct mortality of individuals, or destruction of their roost while bats are present) is prohibited.</li> <li>• Trees or buildings with evidence of bat activity shall be removed during the time that is least likely to affect bats as determined by a qualified bat biologist (in general, roosts should not be removed if maternity bat roosts are present, typically April 15 – August 15, and roosts should not be removed if present bats are in torpor, typically when temperatures are less than 40 degrees Fahrenheit). Non-maternity bat roosts shall be removed by a qualified biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.</li> <li>• All special-status bat roosts that are destroyed shall be replaced at a 1:1 ratio with a roost suitable for the displaced species. The roost will be modified as necessary to provide a suitable roosting environment for the target bat species.</li> </ul>	
<b>Impact BIO-2:</b> The Project's construction of the Blomquist Bridge crossing of Redwood Creek could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act or state protected wetlands through the direct removal, filling, hydrological interruption, or other means (criterion c). (Potentially Significant)	<p><b>Mitigation Measure BIO-2a:</b> Conduct Wetland Delineation.</p> <p>In coordination with the City of Redwood City, a qualified wetland ecologist shall conduct a wetland delineation of the project site to identify the limits of potential wetlands and other waters within the project study area (i.e., Redwood Creek and associated tidal marsh vegetation, and San Francisco Bay) under the jurisdiction of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (RWQCB), and Bay Conservation and Development Commission (BCDC). Features shall be mapped and documented in a report for submission to the Corps, RWQCB, and BCDC which retains authority over such features within and connected to San Francisco Bay.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources (cont.)</b>		
<b>Impact BIO-2 (cont.)</b>	<p><b>Mitigation Measure BIO-2b:</b> Avoidance and Protection of Jurisdictional Wetlands and Other Waters.</p> <p>Access roads, staging and work areas, and infrastructure [i.e., Blomquist bridge] shall be sited to avoid and minimize direct and indirect impacts to wetlands and waters to the extent feasible. Where work will occur on the project within or adjacent to State and federal jurisdictional wetlands and waters, protection measures shall be applied to protect these features to the satisfaction of the City. These measures shall include the following:</p> <ul style="list-style-type: none"> <li>• To the maximum extent feasible, conduct work in creek channels and associated tidal marsh vegetation during the dry season (between June 15 and October 15) to avoid construction activities in flowing streams (typically during the spring and winter). Where water features must be disturbed in support of the project (e.g., installation of a coffer dam or other temporary diversions to isolate flow from the work area), the minimum area of disturbance necessary for construction shall be identified, and the area outside of that shall be avoided.</li> <li>• Stabilize disturbed, exposed slopes and creek banks immediately upon completion of construction activities [e.g., following pedestrian bridge(s) construction/installation] to prevent any soil or other materials from entering aquatic habitat. Plastic monofilament of any kind (including those labeled as biodegradable, photodegradable, or UV degradable) shall not be used. Only natural burlap, coir, coconut or jute wrapped fiber rolls and mats shall be used.</li> <li>• A protective barrier (such as silt fencing) shall be erected around wetland or water features (i.e., San Francisco Bay, Redwood Creek and associated tidal marsh vegetation) to isolate them from project construction activities and reduce the potential for incidental fill, erosion, or other disturbance. A fencing material meeting the requirements of both water quality protection and wildlife exclusion may be used;</li> <li>• Signage shall be installed on the fencing to identify sensitive habitat areas and restrict construction activities beyond fenced limits;</li> <li>• No equipment mobilization, grading, clearing, storage of equipment or machinery, or similar activity shall occur at the project site until a representative of City has inspected and approved the wetland/waters protection fencing;</li> <li>• Ensure that the temporary fencing is continuously maintained until all construction is completed; and</li> <li>• Drip pans and/or liners shall be stationed beneath all equipment staged nearby jurisdictional features overnight to minimize spill of deleterious materials into jurisdictional waters. Equipment maintenance and refueling in support of project implementation shall be performed in designated upland staging areas and work areas, and spill kits shall be available on site. Maintenance activity and fueling must occur at least 100 feet from jurisdictional wetlands and other waters or farther as specified in the project permits and authorizations.</li> </ul>	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources (cont.)</b>		
<b>Impact BIO-2 (cont.)</b>	<p><b>Mitigation Measure BIO-2c: Compensation for Impacts to Wetlands and Waters.</b></p> <p>To offset temporary impacts, restoration to pre-project conditions (typically including contours, topsoil, and vegetation) shall be conducted, as required by regulatory permits (e.g., those issued by the Corps, RWQCB, and BCDC) and to the satisfaction of City. To offset unavoidable permanent impacts to jurisdictional wetlands and waters associated with project fill or shading, compensatory mitigation shall be provided as required by regulatory permits and at a minimum ratio of 2:1 (created/restored/enhanced: impacted). Compensation may include on-site or off-site creation, restoration, or enhancement of jurisdictional resources, as determined by the permitting agencies. On-site or off-site creation/restoration/enhancement plans must be prepared by a qualified biologist prior to construction and approved by the permitting agencies. Implementation of creation/restoration/enhancement activities by the permittee shall occur prior to project impacts, whenever possible, to avoid temporal loss. On or off-site creation/restoration/enhancement sites shall be monitored by the City or their consultant for at least five years to ensure they successfully meet performance criteria.</p>	
<b>Impact BIO-3:</b> The Project could substantially interfere 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 (Criterion d). (Potentially Significant)	<p><b>None Required.</b></p> <p><b>Mitigation Measure BIO-3a: Bird-Safe Building Requirements.</b> To the extent feasible, bird-safe glazing treatments (e.g., fritting, frosting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing, or ultraviolet patterns visible to birds) shall be used to reduce the extent of untreated glass to less than 10 percent on each of the Project buildings.</p> <p><b>Mitigation Measure BIO-3b: Lighting Requirements.</b> The Project shall implement Bird-Safe lighting design and operations, to include the following: 1) The built environment should be designed to minimize light pollution including: light trespass, over-illumination, glare, light clutter, and skyglow while using bird-friendly lighting colors when possible; 2) Unneeded interior and exterior lighting shall be turned off from dusk to dawn during migration periods, defined here as February 15 through May 31 and August 15 through November 30; 3) At all times, rooms where interior lighting is used at night should have window coverings that adequately block light transmission, and motion sensors or controls to extinguish lights in unoccupied spaces.</p>	<u>Less than Significant</u>

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources (cont.)</b>		
<p><b>Impact BIO-4:</b> The Project could conflict with the City of Redwood City’s Tree Protection Ordinance (Redwood City Municipal Code Chapter 35.3) by removal of protected trees under certain circumstances (Criterion e). (Potentially Significant)</p>	<p><b>Mitigation Measure BIO-4:</b> Tree Protection Measures</p> <p>Adequate protection shall be provided by the Project applicant during the construction period for any trees which are to remain standing and deemed to be potentially endangered by said site work. The Project applicant will adhere to all tree protection measures applicable to the Project outlined in Section 5.0 Tree Protection Measures of the Harbor View Place Arborist Report (2018), which include but are not limited to the following:</p> <ol style="list-style-type: none"> <li>1) Before the start of any clearing, excavation, construction or other work on the Project Site, every tree to remain and deemed to be potentially endangered by said site work (‘protected tree’) shall be securely fenced off at a distance from the base of the tree to be determined by the City’s Parks and Recreation Director or Project arborist. This will be considered the Tree Protection Zone (TPZ) and will be consistent with the measures provided in the project’s Arborist Report. Such TPZs shall remain in place for duration of all such work. All trees to be removed shall be clearly marked. A scheme shall be established for the removal and disposal of logs, brush, earth and other debris which will avoid injury to any protected tree.</li> <li>2) Where proposed development or other site work is to encroach upon the protected perimeter of any protected tree, special measures shall be incorporated to allow the roots to breathe and obtain water and nutrients. Any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter shall be minimized. No change in existing ground level shall occur within a distance to be determined by the City’s Parks and Recreation Director or Project arborist from the base of any protected tree at any time. No burning or use of equipment with an open flame shall occur near or within the protected perimeter of any protected tree.</li> <li>3) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees shall occur within any protected tree TPZ, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials shall be operated or stored within the TPZ of any protected tree. Wires, ropes, or other devices shall not be attached to any protected tree, except as needed for support of the tree. No sign, other than a tag showing the botanical classification, shall be attached to any protected tree.</li> </ol>	<p>Less than Significant</p>

**FINAL EIR TABLE 4-1 (Continued)**  
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**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.3 Biological Resources (cont.)</b>		
<b>Impact BIO-4 (cont.)</b>	<p>4) Periodically during construction, the leaves of protected trees shall be thoroughly sprayed with water to prevent buildup of dust and other pollution that would inhibit leaf transpiration.</p> <p>5) If any damage to a protected tree should occur during or as a result of work on the site, the Project applicant shall immediately notify the Parks and Recreation Department of such damage. If, in the professional opinion of the City's Parks and Recreation Director or Project arborist, such tree cannot be preserved in a healthy state, the Director shall require replacement of any tree removed with another tree or trees on the same site deemed adequate by the Director to compensate for the loss of the tree that is removed.</p> <p>6) All debris created as a result of any tree removal work shall be removed by the Project applicant from the property within two weeks of debris creation, and such debris shall be properly disposed of by the Project applicant in accordance with all applicable laws, ordinances, and regulations.</p>	
<b>Impact BIO-1.CU:</b> The Project, combined with cumulative development in the Project vicinity, would not result in significant cumulative impacts on special-status species, sensitive habitats, wildlife movement corridors, wetlands, and other waters of the U.S. (Criterion e) (Less than Significant)	None Required.	
<b>4.4 Cultural Resources and Tribal Cultural Resources</b>		
<b>Impact CUL-1:</b> The Project would not result in the physical demolition, destruction, relocation, or alteration of historical resources that are listed in or may be eligible for listing in the federal, state, or local registers of historical resources (Criterion a). (No Impact)	None Required.	
<b>Impact CUL-2:</b> The Project could result in significant impacts to unknown archaeological resources (Criterion b). (Potentially Significant)	<p><b>Mitigation Measure CUL-2:</b> Inadvertent Discovery of Archaeological Resources or Tribal Cultural Resources.</p> <p>If prehistoric or historic-period archaeological resources are encountered, all construction activities within 100 feet of the find shall halt and the City of Redwood City shall be notified. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist shall inspect the findings within 24 hours of discovery.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.4 Cultural Resources and Tribal Cultural Resources (cont.)</b>		
<b>Impact CUL-2 (cont.)</b>	<p>If it is determined that the project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines) or cause a substantial adverse change in the significance of a tribal cultural resource (defined in Public Resources Code Section 21074), mitigation shall be implemented in accordance with PRC Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. If preservation in place is feasible, this may be accomplished through one of the following means: (1) modifying the construction plan to avoid the resource; (2) incorporating the resource within open space; (3) capping and covering the resource before building appropriate facilities on the resource site; or (4) deeding resource site into a permanent conservation easement.</p> <p>If avoidance or preservation in place is not feasible, a qualified archaeologist shall prepare and implement a detailed treatment plan in consultation with City of Redwood City and, for prehistoric resources, the appropriate Native American representative to recover the scientifically consequential information from and about the resource, which shall be reviewed and approved by the City prior to any excavation at the resource site.</p> <p>Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource to be impacted by the project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals.</p>	
<b>Impact CUL-3:</b> The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature ( <i>Criterion c</i> ). (Potentially Significant)	<p><b>Mitigation Measure CUL-3:</b> Inadvertent Discovery of Paleontological Resources.</p> <p>If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Redwood City.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.4 Cultural Resources and Tribal Cultural Resources (cont.)</b>		
<b>Impact CUL-4:</b> The Project could disturb human remains, including those interred outside of formal cemeteries (Criterion d). (Potentially Significant)	<b>Mitigation Measure CUL-4:</b> Inadvertent Discovery of Human Remains.  In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease until the San Mateo County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission (NAHC) will be contacted within 24 hours if it is determined that the remains are Native American. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the City of Redwood City for the appropriate means of treating the human remains and any grave goods.	Less than Significant
<b>Impact CUL-5:</b> The Project could result in significant impacts to unknown tribal cultural resources (Criterion e). (Potentially Significant)	<b>Mitigation Measure:</b> Implement <b>Mitigation Measure CUL-2</b> .	Less than Significant
<b>Impact CUL-1.CU:</b> The Project, in combination with cumulative development in the vicinity of the Project site, would contribute to a significant adverse cumulative impact to cultural resources, but the contribution would not be considerable. (Potentially Significant)	<b>Mitigation Measure CUL-1.CU:</b> Implement <b>Mitigation Measures CUL-2, CUL-3, and CUL-4</b> .	Less than Significant
<b>4.5 Geology and Soils</b>		
<b>Impact GEO-1:</b> The Project would not expose people or structures to seismic hazards such as ground shaking and seismic-related ground failure such as liquefaction, differential settlement, collapse, or lateral spreading (Criteria a.2 and a.3). (Less than Significant)	None Required.	
<b>Impact GEO-2:</b> The Project would not cause soil erosion or loss of topsoil during construction and operation of the project (Criteria b). (Less than Significant)	None Required.	
<b>Impact GEO-3:</b> The Project would not 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 (Criteria c). (Less than Significant)	None Required.	
<b>Impact GEO-4:</b> The Project would not be located on expansive or corrosive soils creating substantial risks to life or property (Criteria d). (Less than Significant)	None Required.	
<b>Impact GEO-1.CU:</b> The Project, combined with cumulative development in the Project vicinity and citywide, would not result in significant cumulative impacts to geology, soils or seismicity. (Less than Significant)	None Required.	



**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.6 Greenhouse Gas Emissions and Energy</b>		
<b>Impact GHG-1:</b> The Project would produce greenhouse gas emissions that exceed 1,100 metric tons of CO <sub>2</sub> e per year, but would not exceed 2020 or 2030 CO <sub>2</sub> e per service population emission thresholds (Criterion a). ( <del>Less than Significant</del> Potentially Significant)	<del>None Required.</del> <b>[NEW] Mitigation Measure GHG-1 (TDM Plan):</b> The Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement. The TDM Plan must achieve the emissions reduction and/or percent reduction in VMT specified in Table 4.6-8 for the Revised Project in the Final EIR.	<u>Less than Significant</u>
<b>Impact GHG-2:</b> The Project would not conflict with an applicable plan, policy or regulation of an appropriate regulatory agency adopted for the purpose of reducing greenhouse gas emissions (Criterion b). (Less than Significant)	None Required.	
<b>Impact GHG-3:</b> The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources (Criterion c). (Less than Significant)	None Required.	
<b>Impact GHG-4:</b> The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Criterion d). (Less than Significant)	None Required.	
<b>Impact GHG-1.CU:</b> The Project, combined with cumulative development, would result in cumulative impacts regarding GHG emissions and climate change, the but Project's contribution would not be cumulatively considerable (Criteria a and b). (Less than Significant)	None Required.	
<b>Impact GHG-2.CU:</b> The Project, combined with cumulative development citywide, would not conflict with adopted energy conservation plans, violate energy standards, or result in wasteful, inefficient and unnecessary use of energy, such that a cumulative impact would occur (Criteria c and d). (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.7 Hazards and Hazardous Materials</b>		
<b>Impact HAZ-1:</b> The Project could create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials (Criterion a). (Potentially Significant)	<p><b>Mitigation Measure HAZ-1a:</b> Prior to the issuance of a grading permit, the Project applicant shall implement the recommendations contained in the Project-specific Phase I Assessment (RPS, 2018) and submit to the City evidence of approval of the Draft Removal Action Workplan (RAW) by the Department of Toxic Substances Control (DTSC) that contains a Site Management Plan (SMP), Health and Safety Plan stamped by a Certified Industrial Hygienist, a voluntary Dust Control Plan/Asbestos Dust Mitigation Plan/Asbestos Air Monitoring Plan, a Waste Transportation Plan, and Construction Quality Assurance Plan.</p> <p><b>Mitigation Measure HAZ-1b:</b> Prior to the issuance of <del>an occupancy</del> a grading permit, the Project applicant shall record a Land Use Covenant (LUC), in a form approved by the City, that requires that the SMP to be followed during future earthwork activities <del>during and</del> post-development. The LUC shall include conditional language describing when implementation of the SMP will be required for earthwork activities beneath either hardscaped areas or a beneath a specified thickness of clean fill or marker fabric required for non-hardscaped areas. The LUC shall also include language to prohibit the use of groundwater beneath the Project site.</p>	Less than Significant
<b>Impact HAZ-2:</b> Disturbance and release of hazardous structural and building components (i.e., asbestos, lead, and PCBs) with the Project during the demolition phase of construction or transport of these materials would not expose construction workers, the public, or the environment to adverse conditions related to hazardous materials handling (Criteria a). (Less than Significant)	None Required.	
<b>Impact HAZ-3:</b> The Project could 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 (Criterion b). (Less than Significant)	None Required.	
<b>Impact HAZ-4:</b> The Project would 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, create a significant hazard to the public or environment (Criterion d). (Potentially Significant)	<b>Mitigation Measure HAZ-4:</b> Implement Mitigation Measure HAZ-1a and HAZ-1b.	Less than Significant
<b>Impact HAZ-5:</b> Development of the Project would not be located within the airport land use plan for the San Carlos Airport resulting in a safety hazard for people residing or working in the project area (Criterion e). (Less than Significant)	None Required.	
<b>Impact HAZ-1.CU:</b> The Project, combined with cumulative development in the Project vicinity and citywide, could contribute considerably to cumulative impacts related to hazards and hazardous materials. (Potentially Significant)	<b>Mitigation Measure HAZ-1.CU:</b> Implement Mitigation Measures HAZ-1a and HAZ-1b. [change from HAZ-1 and HAZ-1b]	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.8 Hydrology and Water Quality</b>		
<b>Impact HYD-1:</b> The Project would not violate water quality requirements or waste discharge requirements (Criteria a). (Less than Significant)	None Required.	
<b>Impact HYD-2:</b> The Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table (Criteria b). (Less than Significant)	None Required.	
<b>Impact HYD-3:</b> The Project would not potentially alter the drainage pattern of the site such that it would result in substantial erosion or siltation on or off the site (Criteria c and d). (Less than Significant)	None Required	
<b>Impact HYD-4:</b> The Project would not increase runoff and result in flooding on- or off-site (Criteria e). (Less than Significant)	None Required.	
<b>Impact HYD-5:</b> The Project could exceed the capacity of existing or planned stormwater infrastructure (Criteria e). (Potentially Significant)	<b>Mitigation Measure HYD-5:</b> Pump Station Infrastructure Prior to issuance of a certificate of occupancy for the Project, the Project sponsor shall install a new redundant duty pump at the Oddstad Pump Station and a new redundant duty pump at the Seaport Pump Station, pursuant to the <i>Inner Harbor Specific Plan Utilities Engineering Report</i> prepared by West Yost for the City of Redwood City, April 2015, and new stormwater mains to connect to the Seaport Boulevard Public Station, both in accordance with all applicable City of Redwood City Engineering Standards, to the satisfaction of the City. <u>The Project sponsor shall receive a credit for costs of the infrastructure work above the proportionate share of potential new development attributable to the Project, as determined by City.</u>	Less than Significant
<b>Impact HYD-6:</b> The Project would not place housing within the 100-year flood plain and structures would be elevated within the 100-year flood plain and structures within the 100-year flood plain would be elevated (Criteria g and h). (Less than Significant)	None Required.	
<b>Impact HYD-1.CU:</b> The Project, combined with cumulative development in the vicinity of the Project site, would not result in significant cumulative impacts to hydrology and water quality. (Less than Significant)	None Required.	
<b>4.9 Land Use and Planning</b>		
<b>Impact LU-1:</b> The proposed Project would not result in the physical division of an established community or conflict with adjacent or nearby land uses (Criterion a). (Less than Significant)	None Required.	
<b>Impact LU-2:</b> The proposed Project would not conflict with applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect (Criterion b). (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.9 Land Use and Planning (cont.)</b>		
<b>Impact LU-1.CU:</b> The Project, in combination with cumulative development in the vicinity of the Project site, would not result in cumulative impacts to land use and planning. (Less than Significant)	None Required.	
<b>4.10 Noise</b>		
<b>Impact NOI-1:</b> Construction activities associated with the Project would result in substantial temporary or periodic increases in ambient noise levels in excess of standards in the Project vicinity (Criteria a and d). (Potentially Significant)	<p><b>Mitigation Measure NOI-1:</b> Throughout demolition, grading and construction, the Project applicant shall require construction contractors to limit standard construction activities as follows:</p> <ul style="list-style-type: none"> <li>• Consistent with Section 24.32 of the Redwood City Noise Ordinance, construction activities shall be limited to the hours of 7:00 AM to 8:00 PM on weekdays; no construction shall take place at any time on Saturdays, Sundays, and holidays, if the construction generates noise levels exceeding the local ambient noise level measured at any point within a residential area.</li> <li>• Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds.</li> <li>• Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA.</li> <li>• Stationary noise sources shall be located as far from adjacent receptors as possible and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.</li> </ul>	Less than Significant
<b>Impact NOI-2:</b> Construction activities associated with the Project would not result in exposure of persons to or generation of, excessive ground borne vibration or ground borne noise levels in the Project vicinity above levels existing without the Project (Criterion b). (Less than Significant)	None Required.	
<b>Impact NOI-3:</b> Operation of the Project would not create a substantial permanent increase in noise levels in the Project vicinity in excess of standards established in the Redwood City Noise Ordinance and Planning (Criteria a and c). (Less than Significant)	None Required.	
<b>Impact NOI-4:</b> Traffic generated by the Project would not substantially increase traffic noise levels in the Project vicinity and adversely expose existing sensitive receptors (Criterion c). (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.10 Noise (cont.)</b>		
<b>Impact NOI-5:</b> Operation of the Project would not result in exposure of persons to or generation of, excessive ground borne vibration or ground borne noise levels in the Project vicinity above existing levels without the Project (Criteria b). (Less than Significant)	None Required.	
<b>Impact NOI-1.CU:</b> Traffic generated by development of the Project, in combination with traffic from cumulative development in the Project vicinity and citywide, including past, present, existing, approved, pending and reasonably foreseeable future development; and construction and operational noise levels in combination with traffic from cumulative development would not contribute considerably to cumulative noise impacts (Criterion c). (Less than Significant)	None Required.	
<b>4.11 Population, Housing, and Employment</b>		
<b>Impact POP-1:</b> The proposed Project would not induce substantial population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure) (Criterion a). (Less than Significant)	None Required.	
<b>Impact POP-1.CU:</b> The Project, combined with cumulative development in the Project vicinity and citywide, would not result in a significant effect to population, housing, and employment. (Less than Significant)	None Required.	
<b>4.12 Public Services</b>		
<b>Impact PSR-1:</b> The Project could result in an increase in calls for police services, but would not require new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives (Criterion 1a.1). (Less than Significant)	None Required.	
<b>Impact PSR-2:</b> The Project could result in an increase in calls for fire protection and emergency medical response services, but would not require new or physically altered fire protection or emergency medical facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives (Criterion 1a.2). (Less than Significant)	None Required.	
<b>Impact PSR-3:</b> The Project could result in new students for local schools, but would not result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, to maintain acceptable performance objectives (Criterion 1a.3). (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
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**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.12 Public Services (cont.)</b>		
<b>Impact PSR-4:</b> The Project could increase the use of existing neighborhood and regional parks and recreation centers, but not to the extent that substantial physical deterioration of the facilities would occur or be accelerated, nor would it cause the necessity for new or expanded facilities (Criterion 1a.4 and 2a.b). (Less than Significant)	None Required.	
<b>Impact PSR-5:</b> The Project could increase the use of existing public library facilities, but not to the extent that substantial physical deterioration of the facilities would occur or be accelerated, nor would it cause the necessity for new or expanded facilities (Criterion 1a.5). (Less than Significant)	None Required.	
<b>Impact PSR-1.CU:</b> The Project, in combination with other cumulative development in the vicinity of the Project site, would not contribute considerably to a cumulative impact to public services and recreation facilities. (Less than Significant)	None Required.	
<b>4.13 Utilities and Service Systems</b>		
<b>Impact UTIL-1:</b> The Project would not exceed the wastewater treatment requirements of the San Francisco Regional Water Quality Control Board or result in a determination that new or expanded wastewater treatment facilities would be required (Criteria a, b and e). (Less than Significant)	None Required.	
<b>Impact UTIL-2:</b> The water demand generated by the Project would not exceed water supplies available from existing entitlements and resources or require or result in the construction of new water treatment facilities or expansion of existing facilities (Criteria b and d). (Less than Significant)	None Required.	
<b>Impact UTIL-3:</b> The Project would require or result in construction of new stormwater drainage facilities or expansion of existing facilities, but the construction of which would not cause significant environmental effects (Criterion c). (Less than Significant)	None Required.	
<b>Impact UTIL-4:</b> The Project would not violate applicable federal, state, and local statutes and regulations related to solid waste; or generate solid waste that would exceed the permitted capacity of the landfills serving the area (Criteria g and h). (Less than Significant)	None Required.	
<b>Impact UTIL-1.CU:</b> The Project, in combination with cumulative projects in the vicinity of the Project site, would not result in cumulative impacts to utilities and service systems. (Less than Significant)	None Required.	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation</b>		
<i>Intersection Operations – Existing Plus Project (No Blomquist Extension)</i>		
<p><b>Impact TRANS-1:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Potentially Significant)</p>	<p><b>Mitigation Measure TRANS-1:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable
<p><b>Impact TRANS-2:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Potentially Significant)</p>	<p><b>Mitigation Measure TRANS-2A:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p><del><b>Mitigation Measure TRANS-2B:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 400 feet.</del></p>	Significant and Unavoidable
<p><b>Impact TRANS-3:</b> The Project would add traffic to intersection #8 Blomquist Street / Seaport Boulevard / East Bayshore Road and would cause this intersection to degrade from acceptable operations of LOS C to unacceptable operations of LOS F in the PM peak hour under Existing Plus Project without Blomquist Extension Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-3A:</b> Project, the Project applicant shall reconstruct the westbound approach of East Bayshore to accommodate two left-turn lanes with 225-foot pockets, one through lane, and an extended right-turn pocket (from 50 feet to 150 feet). In addition, the applicant shall install a second eastbound right-turn pocket on Blomquist Street. Improvements shall be constructed to the satisfaction of the City.</p> <p><b>Mitigation Measure TRANS-3B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-4:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane which currently operate at LOS F in the PM peak hour under Existing Plus Project Conditions without Blomquist Extension Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-4:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection of Seaport Boulevard/Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable

**FINAL EIR TABLE 4-1 (Continued)**  
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Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<i>Intersection Operations – Existing Plus Project (No Blomquist Extension) (cont.)</i>		
<b>Impact TRANS-5:</b> The Project would add traffic to intersection #21 Edgewood Road / Alameda de Las Pulgas and would cause this intersection to degrade from acceptable operations of LOS D to unacceptable operations of LOS E in the AM peak hour under Existing Plus Project Conditions (Criteria a and b). (Significant)	<b>Mitigation Measure TRANS-5:</b> Prior to receiving the first certificate of occupancy for the Project, improvements to signal operations shall be made by the Project applicant at the intersection of Edgewood Road/Alameda de Las Pulgas, to the satisfaction of City. The eastbound and westbound (Edgewood Road) signal phasing shall be reprogrammed from split phasing to concurrent permissive phases, allowing for eastbound and westbound through vehicles to travel concurrently. This phasing modification would also change the eastbound and westbound left-turn movements from protected to permissive. Additionally, appropriate signage (E.g. "Left turn yield on green") to support the change shall be added to the eastbound and westbound approaches.	Less than Significant
<b>Impact TRANS-6:</b> The Project would result in the addition of traffic to intersection #1 Veterans Boulevard / Whipple Road and would cause this intersection to degrade from LOS D to LOS E in the AM peak hour under Existing Plus Project Conditions (Criteria a and b). (Significant)	<b>Mitigation Measure TRANS-6:</b> The Project applicant shall install improvements to signal operations at the intersection of Veterans Boulevard/Whipple Road, prior to receiving the first certificate of occupancy for the Project. Green time shall be added to the southbound (Veterans Boulevard) through movement (phase 6) and southbound left-turn movement (phase 1) while the green time for the northbound through movement (phase 2) and northbound left-turn movement (phase 5) shall be reduced during the AM peak hour. The overall cycle length shall be shortened from 125 to 120 seconds	Less than Significant
<b>Impact TRANS-7:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Intersection #7) (Criteria a and b). (Potentially Significant)	<b>Mitigation Measure TRANS-7:</b> The Project applicant shall contribute its fair share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Significant and Unavoidable
<b>Impact TRANS-8:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Intersection #11) (Criteria a and b). (Potentially Significant)	<b>Mitigation Measure TRANS-8A:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  <del><b>Mitigation Measure TRANS-8B:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.</del>	Significant and Unavoidable



**FINAL EIR TABLE 4-1 (Continued)**  
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Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<i>Intersection Operations – Existing Plus Project (with Blomquist Extension) (cont.)</i>		
<p><b>Impact TRANS-9:</b> The Project would add traffic to intersection #8 Blomquist Street / Seaport Boulevard / East Bayshore Road and would cause this intersection to degrade from acceptable operations of LOS C to unacceptable operations of LOS F in the AM and PM peak hours under Existing Plus Project Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-9A:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall reconstruct the westbound (East Bayshore Road) approach at the intersection of Blomquist Street/Seaport Boulevard/East Bayshore Road to accommodate two left-turn lanes with 225-foot pockets, one through lane, and an extended right-turn pocket (from 50 feet to 150 feet). In addition, the applicant shall install a second eastbound (Blomquist Street) right-turn pocket. Improvements shall be constructed to the satisfaction of the City.</p> <p><b>Mitigation Measure TRANS-9B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-10:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane which currently operates at LOS F in the PM peak hour under Existing Plus Project Conditions with Blomquist Extension Conditions. (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-10:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection of Seaport Boulevard/Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable
<p><b>Impact TRANS-11:</b> The Project would add traffic to intersection #21 Edgewood Road / Alameda de Las Pulgas and would cause this intersection to degrade from acceptable operations of LOS D to unacceptable operations of LOS E in the AM peak hour under Existing Plus Project Conditions with Blomquist Extension (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-11:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall make improvements to signal operations at the intersection of Edgewood Road/Alameda de Las Pulgas to the satisfaction of the City. The eastbound and westbound (Edgewood Road) signal phasing should be reprogrammed from split phasing to concurrent permissive phases. This phasing allows for eastbound and westbound through vehicles to travel concurrently. This phasing modification would also change the eastbound and westbound left-turn movements from protected to permissive. Additionally, appropriate signage (E.g. “Left turn yield on green”) to support the change shall be added to the eastbound and westbound approaches.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<b>Freeway Operations – Existing Plus Project (No Blomquist Extension)</b>		
<p><b>Impact TRANS-12:</b> Project-generated traffic would cause the following mainline freeway segments to exceed their LOS standard:</p> <p>A. Southbound US 101 north of Whipple Avenue – AM peak hour</p> <p>C. Northbound US 101 south of Woodside Road – AM peak hour</p> <p>(Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-12A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 southbound north of Whipple and northbound south of Woodside Road</p> <p><b>Mitigation Measure TRANS-12B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-13:</b> The Project would add traffic to the northbound US 101 off-ramp to Woodside Road and would cause this freeway ramp to exceed its capacity in the AM peak hour (V/C ratio = 1.03) under Existing Plus Project Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-13:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the northbound Woodside Road off-ramp and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable
<b>Intersection Operations – Existing Plus Project (With Blomquist Extension)</b>		
<p><b>Impact TRANS-14:</b> Project-generated traffic would cause the following mainline freeway segments to exceed their LOS standard:</p> <p>A. Southbound US 101 north of Whipple Avenue – AM peak hour</p> <p>C. Northbound US 101 south of Woodside Road – AM peak hour</p> <p>(Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-14A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 southbound north of Whipple and northbound south of Woodside Road. <b>Mitigation Measure TRANS-14B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-15:</b> The Project would add traffic to the northbound US 101 off-ramp to Woodside Road and would cause this freeway ramp to exceed its capacity in the AM peak hour (V/C ratio = 1.03) under Existing Plus Project Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-15:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the northbound Woodside Road off-ramp and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<b>Impact TRANS-23:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Significant)	<b>Mitigation Measure TRANS-23C:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall implement geometric changes to intersection #11 Woodside Road/Middlefield Road to the satisfaction of the City. Changes are to modify the westbound (Middlefield Road) approach to two left turn lanes with 400 foot pockets, one through lane, and one shared through right lane with a 100 foot pocket.	
<b>Impact TRANS-25:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the PM peak hour for intersection #3 Bair Island Road / East Bayshore Road (Criteria a and b). (Significant)	<b>Mitigation Measure TRANS-25A:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct intersection geometry improvements at Bair Island Road / East Bayshore Road. The geometry improvements are widening the roundabout to two circulation lanes, and changing the westbound approach to one through lane and a 100 foot right turn pocket. In addition, the southbound approach would be widened into two lanes, one left turn and one right turn lane.	Significant and Unavoidable
<b>Impact TRANS-26:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM peak hour for intersection #4 Veterans Boulevard / Maple Street (Criteria a and b). (Significant)	<b>Mitigation Measure TRANS-26:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall <u>contribute its fair share contribution to implement</u> geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet <u>or</u> to 250 feet or to the satisfaction of the City; <u>and</u> <u>-In addition, the applicant shall make signal improvements</u> to optimize overall cycle length and adjust green split timing. <u>Green time shall be added to the eastbound left turn movement (phase 1), westbound left turn movement (phase 5), and northbound and southbound through movements (phase 4), while overall cycle length shall extend from 116 second to 160 seconds.</u> Project applicant shall also coordinate with the City to ensure that signal timing changes do not negatively affect adjacent coordinated signals along Veterans Boulevard.	<u>Less than Significant</u>
<b>Other Transportation Issues - Project</b>		
<b>Impact TRANS-16:</b> The Project would not result in hazards regarding site access and circulation (criterion d). (Less than Significant)	None Required	
<b>Impact TRANS-17:</b> The Project would not result in substantial safety risks associated with a change in air traffic patterns (criterion c). (Less than Significant)	None Required	
<b>Impact TRANS-18:</b> The Project would not conflict with adopted transit policies, plans, or programs or decrease the performance or safety of transit facilities (criterion f). (Less than Significant)	None Required	

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<b>Impact TRANS-19:</b> The Project would not conflict with adopted bicycle or pedestrian policies, plans, or programs, or decrease the performance or safety of those facilities (criterion f). (Less than Significant)	None Required	
<b>Impact TRANS-20:</b> The Project would not result in inadequate emergency access (criterion e). (Less than Significant)	None Required	
<b>Impact TRANS-21:</b> Construction associated with development of the Project would increase traffic volumes at area intersections and on area freeways, potentially causing temporary increased congestion and/or disruption of vehicle, pedestrian, bicycle and transit circulation (Criterion a and b). (Potentially Significant)	<p><b>Mitigation Measure TRANS-21:</b> The Project applicant shall develop and submit to the City for approval a construction management plans that specifies measures that would reduce impacts of construction-related traffic to motor vehicle, bicycle, pedestrian, and transit circulation. The City must approve the plans prior to issuance of a building permit. Construction management plans shall include the following:</p> <ul style="list-style-type: none"> <li>• Location of construction staging areas for materials, equipment, and vehicles;</li> <li>• Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur;</li> <li>• Identification of haul routes for movement of construction vehicles that would minimize impacts on vehicular, bicycle, and pedestrian traffic, circulation, and safety; and provision for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the Project applicant;</li> <li>• Provisions for removal of trash generated by Project construction activity;</li> <li>• A process for responding to, and tracking complaints pertaining to construction activity, including identification of an on-site complaint manager; and</li> <li>• Provisions for pedestrian, bicycle, and transit circulation through the congestion zone, including maintaining pedestrian and bicycle access between the bridge over Redwood Creek and Blomquist Street sidewalks and bike lanes.</li> </ul> <p>Implementation of this mitigation measure would improve temporary construction conditions and improve safety for all modes of transportation.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<i>Cumulative Intersection Operations</i>		
<p><b>Impact TRANS-22:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-22:</b> Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable
<p><b>Impact TRANS-23:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-23A:</b> Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.</p> <p><del><b>Mitigation Measure TRANS-23B:</b> applicant shall implement geometric changes to intersection #10 Bay Road/Woodside Road to the satisfaction of the City. Changes are to convert the eastbound (Bay Road) approach to a left turn pocket of 100 feet, one through lane, and a shared through right lane, add a northbound (Woodside Road) through lane, and convert the westbound approach to a right turn pocket of 250 feet, a left turn pocket of 250 feet, and three westbound through lanes. Additionally, the overall cycle length shall be optimized while adding protected left turn phases for both the westbound and eastbound movements.</del></p> <p><del><b>Mitigation Measure TRANS-23C:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall implement geometric changes to intersection #11 Woodside Road/Middlefield Road to the satisfaction of the City. Changes are to modify the westbound (Middlefield Road) approach to two left turn lanes with 400-foot pockets, one through lane, and one shared through right lane with a 100-foot pocket</del></p> <p><del><b>Mitigation Measure TRANS-23D/TRANS-23B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</del></p>	Significant and Unavoidable
<p><b>Impact TRANS-24:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM and PM peak hours for intersection #1 Veterans Boulevard / Whipple Avenue (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-24:</b> Prior to receiving the certificate of occupancy, the Project sponsor shall implement improvements to signal operations at the intersection of Veterans Boulevard/Whipple Avenue to optimize overall cycle length and adjusting green split timing to the satisfaction of the City.</p>	Less than Significant

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**(UPDATED) SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<b>Cumulative Intersection Operations (cont.)</b>		
<p><b>Impact TRANS-25:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the PM peak hour for intersection #3 Bair Island Road / East Bayshore Road (Criteria a and b). (Significant)</p>	<p><del><b>Mitigation Measure TRANS-25A:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct intersection geometry improvements at Bair Island Road / East Bayshore Road. The geometry improvements are widening the roundabout to two circulation lanes, and changing the westbound approach to one through lane and a 100-foot right turn pocket. In addition, the southbound approach would be widened into two lanes, one left turn and one right turn lane.</del></p> <p><b>Mitigation Measure TRANS-25B/TRANS-25:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-26</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM peak hour for intersection #4 Veterans Boulevard / Maple Street (Criteria a and b). (Significant)</p>	<p><del><b>Mitigation Measure TRANS-26:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall contribute its fair share contribution implement geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet to 250 feet or to the satisfaction of the City; and to, In addition, the applicant shall make signal improvements to optimize overall cycle length and adjust green split timing. Green time shall be added to the eastbound left turn movement (phase 4), westbound left turn movement (phase 5), and northbound and southbound through movements (phase 4), while overall cycle length shall extend from 116 second to 160 seconds. Project applicant shall also coordinate with the City to ensure that signal timing changes do not negatively affect adjacent coordinated signals along Veterans Boulevard.</del></p>	Less than Significant
<p><b>Impact TRANS-27:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane in the PM peak hour. (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-27:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection at Seaport Boulevard / Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable

**FINAL EIR TABLE 4-1 (Continued)**  
**REVISED DRAFT EIR TABLE 2-2**  
**SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS – REVISED PROJECT**

Environmental Impact	Standard Conditions of Approval and Mitigation Measures	Level of Significance after Application of Mitigation, if applicable
<b>4.14 Transportation and Circulation (cont.)</b>		
<b>Cumulative Freeway Operations</b>		
<p><b>Impact TRANS-28:</b> Under Cumulative Plus Project Conditions, the Project would add traffic volumes representing more than one percent of the segment's capacity to the following freeway segments exceeding their LOS standard and/or capacity without the Project:</p> <p>A. Southbound US 101 north of Whipple Avenue – AM and PM peak hours                      A. Northbound US 101 north of Whipple Avenue – PM peak hour                      B. Southbound US 101 south of Whipple Avenue – AM and PM peak hours                      C. Northbound US 101 south of Woodside Road – AM peak hour                      D. Southbound US 101 south of Woodside Road – PM peak hour</p> <p>(Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS- 28A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 at Whipple Avenue and Woodside Road.</p> <p><b>Mitigation Measure TRANS- 28B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	Significant and Unavoidable
<p><b>Impact TRANS-29:</b> Under Cumulative Plus Project Conditions, the Project would result in the addition of traffic volumes representing more than five percent of the ramp's capacity to the northbound US 101 Off-Ramp to Woodside Road and southbound US 101 On-Ramp from Woodside Road, which already exceed the ramp capacity in the AM and PM peak hours, respectively under Cumulative Plus Project Conditions (Criteria a and b). (Significant)</p>	<p><b>Mitigation Measure TRANS-29:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the Woodside Road ramps and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project. (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Significant and Unavoidable
<p><b>Impact TRANS-30:</b> Under Cumulative Plus Project Conditions, the Project would not result in hazards regarding site access and circulation (Criterion d). (Less than Significant)</p>	None Required.	
<p><b>Impact TRANS-31:</b> Under Cumulative Plus Project Conditions, the Project would not conflict with adopted bicycle or pedestrian policies, plans, or programs, or decrease the performance or safety of those facilities (Criterion f). (Less than Significant)</p>	None Required.	
<p><b>Impact TRANS-32:</b> Under Cumulative Plus Project Conditions, the Project would not conflict with adopted transit policies, plans, or programs or decrease the performance or safety of transit facilities (Criterion f). (Less than Significant)</p>	None Required.	
<p><b>Impact TRANS-33:</b> Under Cumulative Plus Project Conditions, the Project would considerably contribute to inadequate emergency access (Criterion e). (Potentially Significant)</p>	<p><b>Mitigation Measure TRANS-33:</b> Prior to receiving the certificate of occupancy, the Project applicant shall install emergency vehicle pre-emption equipment at the intersection of Maple Street/Veterans Boulevard to the satisfaction of the City.</p>	Less than Significant
<p><b>Impact TRANS-34:</b> Under Cumulative Plus Project Conditions, the Project would not result in substantial safety risks associated with a change in air traffic patterns (Criterion c). (Less than Significant)</p>	None Required.	

## FINAL EIR TABLE 4-2

## REVISED DRAFT EIR TABLE 4.9-1

## CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT

General Plan Policy or Program	Conflict / Consistent
<b>Aesthetics</b>	
<ul style="list-style-type: none"> <li>Policy BE-1.9: Carefully consider new shade, shadow, light, and glare effects from proposed development projects and comprehensive plans.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-3.2: Encourage new development to create direct and clear visual relationships between residences and public streets, while minimizing driveways, parking areas, and garage doors in front yard spaces.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-10.8: Whenever possible, encourage new development in Waterfront Neighborhoods to take shape as extensions of the urbanism of Redwood City, with street patterns of a similar scale to historic areas, buildings fronting those streets, and with good connections between adjacent projects. If a new large-scale development project is able to achieve circulation interconnectedness for all modes and maximize walkability, then the small block pattern may not be required.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-11.9: Encourage pedestrian activity by requiring all ground-floor businesses to include transparent window fronts and, to the greatest degree possible, be oriented toward commerce.</li> </ul>	Consistent
<b>Air Quality</b>	
<ul style="list-style-type: none"> <li>Program PS-1: Air Quality Standards. Use methodologies and practices set by the U.S. Environmental Protection Agency, CARB, and the BAAQMD that measure air quality at emission sources.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-1.2: Minimize vehicle emissions by reducing automobile use and encouraging alternative means of transportation.</li> </ul>	Consistent, with implementation of mitigation measures to minimize emissions to the greatest extent feasible, but not to less than significant.
<ul style="list-style-type: none"> <li>Policy PS-1.5: Require projects that generate potentially significant levels of air pollutants to incorporate the most effective air quality mitigation into project design, as feasible.</li> </ul>	Consistent, with implementation of mitigation measures to minimize emissions to the greatest extent feasible, <del>but not to less than significant.</del>
<ul style="list-style-type: none"> <li>Policy PS-2.1: Consider surrounding land uses when locating sensitive receptors such as schools, hospitals, and residential uses so they are not unreasonably exposed to uses that generate pollutants considered detrimental to human health.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-2.4: Avoid placing sensitive uses within 500 feet—other distance deemed to be appropriate based on project-specific health risk assessment data—of the Port of Redwood City, related heavy industrial areas, and any roadways serving Port uses.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-3.1: Support programs that increase ridesharing, reduce pollutants generated by vehicle use, and meet the transportation control measures recommended by BAAQMD in the most recent Clean Air Plan.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-3.3: Implement policies of the Built Environment Element that provide for compact, urban-style forms of development and complete streets and neighborhoods to reduce vehicle emissions by placing residents closer to jobs and services and providing alternative modes of transportation.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-3.4: Implement the policies of the Built Environment Element that promote transportation mode shifts away from private automobile travel.</li> </ul>	Consistent



**FINAL EIR TABLE 4-2 (Continued)**

**REVISED DRAFT EIR TABLE 4.9-1**

**CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

General Plan Policy or Program	Conflict / Consistent
<ul style="list-style-type: none"> <li>Program PS-4: Air Pollution Control Plans. Require developers to implement appropriate air pollution control plans to reduce dust and exhaust emissions from construction equipment.</li> </ul>	Consistent, with implementation of mitigation measures to minimize emissions to the greatest extent feasible, but not to less than significant.
<ul style="list-style-type: none"> <li>Program PS-5: Energy Efficiency Standards. Require new buildings and building additions to meet Green Building standards, consistent with the Green Building Ordinance.</li> </ul>	Consistent
<b>Biological Resources</b>	
<ul style="list-style-type: none"> <li>Policy NR-6.5: Take steps to reduce urban runoff into creeks and the Bay.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-8.1: Pursue efforts to protect sensitive biological resources, including local, State and federally designated sensitive, rare, threatened and endangered plant, fish and wildlife species, and their habitats.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-8.2: Preserve and create contiguous wildlife habitat and movement corridors.</li> </ul>	Consistent, with mitigation measures to reduced impacts to less than significant.
<ul style="list-style-type: none"> <li>Policy NR-9.1: Preserve, maintain, and expand the number of trees in Redwood City’s urban forest, on both public and private property.</li> </ul>	Consistent, with mitigation measures to reduced impacts to less than significant.
<ul style="list-style-type: none"> <li>Policy NR-9.2: Require new trees to be planted and/or plant new trees in sufficient number, as identified on a site by site basis, on sites designated as sensitive receptors (i.e. schools or hospitals) that are in close proximity to industry, heavily traveled freeways and roads, and other similar pollution sources in order to mitigate air pollution.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-9.3: Select appropriate trees for Redwood City, focusing especially on native and landmark tree types.</li> </ul>	Consistent
<b>Cultural and Paleontological Resources</b>	
<ul style="list-style-type: none"> <li>Policy BE-37.1: Enhance, restore, preserve, and protect, as appropriate, historic resources throughout the city.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-37.2: Preserve historic landmark structures, landscapes (including trees), trails, and sites that serve additional community needs, such as recreational open space and/or cultural needs.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-37.3: Encourage the retention and/or adaptive reuse of historic residential, commercial, and industrial buildings.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-37.8: Permit removal of non-contributing elements of structures in or adjacent to designated historic resources to allow replacement by compatible, historically appropriate structures.</li> </ul>	Consistent
<b>Geology and Soils</b>	
<ul style="list-style-type: none"> <li>Policy PS-6.1: Identify structural types, land uses, and sites that are highly sensitive to earthquake activity and other geological hazards, and seek to abate or modify them to achieve acceptable levels of risk.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-6.3: Work to ensure that structures and the public in Redwood City are exposed to reduced risks from seismic and geological events.</li> </ul>	Consistent

**FINAL EIR TABLE 4-2 (Continued)****REVISED DRAFT EIR TABLE 4.9-1****CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

<b>General Plan Policy or Program</b>	<b>Conflict / Consistent</b>
<ul style="list-style-type: none"> <li>Program PS-23: Seismic Safety Addressed in CEQA. Require environmental documents prepared in connection with CEQA to address seismic safety issues, and provide adequate mitigation for existing and potential hazards.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program PS-24: Geotechnical Analysis. Require a geotechnical analysis for construction in areas with potential geological hazards, and implement appropriate mitigation recommendations.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program PS-25: International Building Code. Continue to implement the International Building Code seismic safety standards for construction of new buildings, and update the City's codes as needed to respond to new information, standards, and technology.</li> </ul>	Consistent
<b>Greenhouse Gases</b>	
<ul style="list-style-type: none"> <li>Policy PS-1.3: Pursue efforts to reduce air pollution and greenhouse gas emissions by promoting the use of renewable energy (e.g., solar, wind, and hydroelectric power), and implement effective energy conservation and efficiency measures.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-4.4: Promote urban forestation and other ecosystems that offer significant carbon mitigation potential.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-5.2: Strive to reduce per capita greenhouse gas emissions and total municipal greenhouse gas emissions to 15 percent below 2005 levels by 2020.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-5.3: Reduce greenhouse gas emissions and adapt to climate change with efforts in the following areas. Major mitigation and adaptation strategies will include: <ul style="list-style-type: none"> <li>Energy: Incentivize renewable energy installation, facilitate green technology and business, and reduce community-wide energy consumption.</li> <li>Land Use: Encourage investment and development in Downtown, transit-oriented development, compact development, infill development, and a mix of uses. Discourage development on land vulnerable to flooding from sea level rise where potential impacts cannot be adequately addressed.</li> <li>Transportation: Enhance bicycling and walking infrastructure, and support public transit, including Caltrain, rapid rail, streetcars, and public bus service.</li> <li>Buildings: Educate developers regarding the City's Green Building Ordinance, and develop an assessment of green building techniques as a formal stage of City design review. Consider strategies to encourage energy and water conservation retrofits in existing buildings. Adaptation strategies will also include increased water efficiency in buildings.</li> <li>Waste: Increase composting, recycling, and efforts to reduce waste generation, focusing especially on large commercial and industrial waste producers.</li> <li>Ecology: Plant trees and more vegetation, and endeavor to preserve open space. Major climate adaptation strategies will include native and drought-resistant planting and preservation of open space buffers near floodplains that may be affected by sea level rise.</li> <li>Communication and Programs: Develop or support energy- or climate change-themed publications and workshops, facilitate energy audits for residents, and establish partnerships to reduce greenhouse gas emissions</li> </ul> </li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-4.2: Promote the use of renewable energy and support efforts to develop small scale, distributed energy (e.g., solar power, wind, cogeneration, and biomass) to reduce the amount of electricity drawn from the regional power grid, while providing Redwood City with a greater degree of energy self-sufficiency.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-4.4: Pursue efforts to reduce energy consumption through appropriate energy conservation and efficiency measures throughout all segments of the community.</li> </ul>	Consistent

**FINAL EIR TABLE 4-2 (Continued)****REVISED DRAFT EIR TABLE 4.9-1****CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

<b>General Plan Policy or Program</b>	<b>Conflict / Consistent</b>
<ul style="list-style-type: none"> <li>Policy NR-4.5: Conserve energy by promoting efficient and cost-effective lighting that reduces glare and light pollution.</li> </ul>	Consistent
<b>Hazards and Hazardous Materials</b>	
<ul style="list-style-type: none"> <li>Policy PS-8.1: Establish policies to regulate and reduce hazardous waste within Redwood City that are consistent with the County's Hazardous Waste Management Plan and other County regulatory programs.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-8.4: Encourage the use of green building practices to reduce potentially hazardous materials in construction materials.</li> </ul>	Consistent
<b>Hydrology</b>	
<ul style="list-style-type: none"> <li>Policy BE-24.11: Consider the impacts of global warming, such as rising sea levels and floodplain areas, when reviewing plans for new development.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program BE-155: NPDES. Continue to comply with all provisions of the National Pollutant Discharge Elimination System (NPDES) permit, and support regional efforts by the San Francisco Bay Regional Water Quality Control Board (RWQCB) to improve and protect water quality.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy NR-5.2: Limit construction activities to protect water quality in creeks and streams.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-7.1: Avoid or minimize the risks of flooding to new development. Carefully evaluate whether new development should be located in flood hazard zones, and identify construction methods or other methods to minimize damage if new development is located in flood hazard zones.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy PS-7.2: Improve the drainage system's level of service to minimize storm flooding.</li> </ul>	Consistent
<b>Land Use and Planning</b>	
<ul style="list-style-type: none"> <li>Policy BE-1.4: Require that buildings and properties be designed to ensure compatibility within and provide interfaces between Neighborhoods, Centers, and Corridors.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-1.6: Require that new large-scale projects are developed with an interconnected pattern of small blocks to induce walking and create walkable neighborhoods and to maximize connections between neighborhoods. If a new large-scale development project is able to achieve circulation interconnectedness for all modes and maximize walkability, then the small block pattern may not be required.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-1.7: Require that new large-scale projects consist of buildings oriented to public streets, rather than private drives, walkways, and parking lots.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-10.1: Require that Waterfront Neighborhoods provide public access along water edges, to public open spaces and trails and to vista points, as integral parts of neighborhood development.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-10.3: Ensure that development in Waterfront Neighborhoods considers and plans for potential impacts associated with climate change and sea level rise.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li><u>BE-10.4: Consider the design of Mixed Use - Waterfront neighborhoods and relationship to the Port area and Port uses.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li>Policy BE-10.6: Require that development along the U.S. 101 frontage include design elements, landscaping, and signage that create a positive aesthetic condition, as viewed from the freeway corridor.</li> </ul>	Consistent

## FINAL EIR TABLE 4-2 (Continued)

## REVISED DRAFT EIR TABLE 4.9-1

## CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT

General Plan Policy or Program	Conflict / Consistent
<ul style="list-style-type: none"> <li>Policy BE-11.1: Improve the corridors to create a network of “complete streets” that emphasize pedestrian orientation and safety, public transit access, safe bicycle movement, and other improvements. (Also <i>Transportation and Traffic</i>)</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-11.5: Improve public streetscapes along the corridors, including widened sidewalks and crosswalks, protected crosswalks, regular street tree planting, bus shelters and street furniture, and pedestrian-oriented street lighting.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-17.4: Facilitate a new Redwood Creek/Harbor Center that embraces Redwood Creek and the Bay, fostering an exciting waterfront destination and neighborhood with a mix of uses.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program BE-18: Redwood Creek/Harbor Master Plan. Develop a Master Plan for the areas surrounding Redwood Creek, linking the harbor area, Redwood Creek, and Downtown Redwood City. The Master Plan should create a “destination” harbor center. It should address connections between Downtown and the Bay, and focus on placemaking, “destination” land uses, design, incentives, trails and connections, and necessary infrastructure improvements. The Master Plan should attempt to redress the barrier and disconnection created by U.S. 101 between Downtown and the Bay. It should attempt to reinforce an east-west focus rather than north-south. The Master Plan should consider creating bridges across the creek that may be parallel but separate from Blomquist extension to further enhance trails, open space accessibility, and connectivity.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li><u>BE-21.1: Allow for growth and intensification of industrial uses in the Port Industrial Center.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>BE-21.4: Maintain railroad rights-of-way for materials transport and potential transit use.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>Program BE-22: Land Use/Neighborhood Transitions: Through design guidelines, strive to attain development in Waterfront Neighborhoods that minimize potential conflicts with the Port area’s industrial uses.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>Policy BE-22.2: Apply the following performance criteria and standards, as applicable, to all new development projects, with the level of application commensurate with the scale of development. [The policy lists a variety of performance criteria, including:...] Uses proposed must clearly be compatible with surrounding established and planned uses.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>Policy BE-30.1: Minimize potential conflicts between trucks and pedestrian, bicycle, and transit access and circulation on streets designated as truck routes.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>Policy BE-30.2: Minimize potential conflicts between truck loading and unloading and pedestrian, bicycle, and transit access and circulation.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li><u>Policy BE-32.4: Maintain the Port of Redwood City as a critically important use, and protect long-term Port, Port-related, and surrounding industrial uses from the encroachment of incompatible land uses as appropriate.</u></li> </ul>	<u>Consistent</u>
<ul style="list-style-type: none"> <li>Policy BE-19.4: Encourage Employment Centers to incorporate accessory uses such as public open space and/or trails, transit amenities, child care facilities, and supportive retail uses based on the size and location of the development.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-23.10: Allow development projects to exceed maximum densities if the development is within a designated planning area (such as certain precise plans) and the project demonstrates some or all of the following features that provide significant community benefits: <ul style="list-style-type: none"> <li>– Superior design and integration of a mix of uses</li> <li>– Incorporation of affordable housing</li> <li>– Incorporation of public or community facilities</li> </ul> </li> </ul>	Consistent

**FINAL EIR TABLE 4-2 (Continued)**

**REVISED DRAFT EIR TABLE 4.9-1**

**CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

General Plan Policy or Program	Conflict / Consistent
<ul style="list-style-type: none"> <li>- Transportation demand management</li> <li>- Innovative use of shared parking</li> <li>- Efficient and innovative use of infrastructure and renewable resources</li> <li>- Supportive of new transit such as streetcars</li> </ul>	
<ul style="list-style-type: none"> <li>• Policy BC-5.2: complete the Bay Trail through Redwood City. (Also <i>Transportation and Traffic</i>)</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy BC-5.6: Provide access to water-based recreation opportunities in San Francisco Bay and along bayfront lands. (Also <i>Public Services and Recreation</i>)</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-14.2: Require that proposed land use policy actions (such as a General Plan amendment, Zoning amendment, or a Precise Plan) within the identified aircraft noise contours for San Carlos Airport are:                             <ul style="list-style-type: none"> <li>- Reviewed by the Airport Land Use Commission (C/CAG Board)</li> <li>- Mitigated for potential noise impacts, as appropriate to applicable City noise standards, by the developer</li> <li>- Consistent with the Aircraft Noise/Land Use Compatibility\</li> </ul> </li> </ul>	Consistent
<b>Noise</b>	
<ul style="list-style-type: none"> <li>• Policy PS-13.3: Consider noise impacts as part of the development review process, particularly the location of parking, ingress/egress/loading, and refuse collection areas relative to surrounding residential development and other noise-sensitive land uses.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-13.4: In accordance with the Municipal Code and noise standards contained in the General Plan, strive to provide a noise environment that is at an acceptable noise level near schools, hospitals, and other noise sensitive areas</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-13.5: Limit the hours of operation at all noise generation sources that are adjacent to noise sensitive areas, wherever practical.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-13.6: Require all exterior noise sources (construction operations, air compressors, pumps, fans, and leaf blowers) to use available noise suppressions devices and techniques to bring exterior noise down to acceptable levels that are compatible with adjacent land uses.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-13.8: Implement appropriate standard construction noise controls for all construction projects.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Policy PS-13.9: Require noise created by new non-transportation noise sources to be mitigated so as not to exceed acceptable interior and exterior noise level standards.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>• Program PS-63: Enforce standard construction noise controls. Enforce standard construction noise controls such as:                             <ul style="list-style-type: none"> <li>- Limit construction to the hours of 8:00 AM to 5:00 PM on weekdays, and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays.</li> <li>- Control noise from construction workers' radios to the point where they are not audible at existing residences that border the project site.</li> <li>- Equip all internal combustion engine-driven equipment with mufflers that are in good condition and appropriate for the equipment.</li> <li>- Utilize quiet models of air compressors and other stationary noise sources where technology exists.</li> </ul> </li> </ul>	Consistent, with mitigation measures to reduced impacts to less than significant.

**FINAL EIR TABLE 4-2 (Continued)****REVISED DRAFT EIR TABLE 4.9-1****CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

<b>General Plan Policy or Program</b>	<b>Conflict / Consistent</b>
– Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.	
• Policy NR-2.2: Encourage the use of drought-tolerant, low-water consuming landscaping as a means of reducing overall and per capita water demand.	Consistent
• Policy NR-3.1: Require new development to demonstrate that adequate water is available before project approval.	Consistent
<b>Population, Housing, and Employment</b>	
• Policy BE-10.2 ( <i>See Land Use and Planning</i> )	Consistent
<b>Public Services</b>	
• Policy BC-1.3: Enhance street corridors, parkways, and public property between buildings to serve as functional recreation and green space.	Consistent
• Policy BC-1.5: Consider all opportunities to create and acquire lands for parks, community gardens, rooftop gardens, and community gathering places.	Consistent
• Policy BC-3.1 Incorporate flexible design characteristics into the renovation of existing and development of new parks and community facilities. Consider incorporating education with recreation opportunities.	Consistent
• Policy BC-5.6: ( <i>See Land Use and Planning</i> )	
<b>Utilities</b>	
• Policy BE-40.6: Support the expansion of the city's Recycled Water Service Area, and actively promote widespread use of recycled water in and around Redwood City.	Consistent
• Policy BE-41.3: Minimize groundwater infiltration and inflow to the wastewater collection system to maintain sufficient peak wet weather capacity and continue to explore other possible options to reduce peak wet weather flow.	Consistent
• Policy BE-42.1: Require that improvements and maintenance to electric and gas transmission and distribution systems that are made to accommodate new growth be performed in a manner that maintains safety, reliability, and environmental compatibility.	Consistent
• Policy BE-42.2: Support efforts to increase the use of renewable energy and low-emission power sources. Encourage the installation and construction of renewable energy systems and facilities such as wind, solar, hydropower, geothermal, and biomass facilities.	Consistent
• Policy BE-43.2: Require new buildings, particularly taller buildings, to be designed with sufficient space to accommodate wireless communications equipment.	Consistent
• Policy BE-44.2: Continue to require the placement of utilities underground with new development.	Consistent
• Policy BE-45.1: Meet or exceed State mandates regarding the diversion of waste from landfills.	Consistent
• Policy BE-45.2: Encourage recycling, composting, and source reduction by residential and non-residential sources in Redwood City.	Consistent

**FINAL EIR TABLE 4-2 (Continued)**

**REVISED DRAFT EIR TABLE 4.9-1**

**CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

General Plan Policy or Program	Conflict / Consistent
<ul style="list-style-type: none"> <li>Policy BE-45.3: Promote green building practices with respect to recycling material from building demolition and using recycled building materials in new construction.</li> </ul>	Consistent
<b>Transportation and Traffic</b>	
<ul style="list-style-type: none"> <li>Program BE-7: Access to Residential Waterfront Neighborhoods. Continue to pursue an extension of Blomquist Street to link the Bayfront over Redwood Creek.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-11.1 (See <i>Land Use and Planning</i>)</li> </ul>	
<ul style="list-style-type: none"> <li>Policy BE-11.5 (See <i>Land Use and Planning</i>)</li> </ul>	
<ul style="list-style-type: none"> <li>Policy BE-25.1: Accommodate and encourage alternative transportation modes to achieve Redwood City’s mobility goals and reduce vehicle trip generation and vehicle miles traveled (VMT).</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-25.3: Support using the concept of complete streets to design, construct, operate, and maintain City and private streets to enable safe, comfortable, and attractive access and travel for pedestrians, bicyclists, motorists, and transit users of all ages, abilities, and preferences. Use the complete streets concept to better link the Port, Seaport Centre, Pacific Shores, and other employment centers with Downtown and other nearby areas.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-25.4: Consider impacts on overall mobility and various travel modes when evaluating transportation impacts of new developments or infrastructure projects.</li> </ul>	Consistent, with mitigation measures to address significant and unavoidable impacts where feasible.
<ul style="list-style-type: none"> <li>Policy BE-25.5: Continue to implement Pedestrian Enhanced Designs (PEDs), especially on streets with projected excess vehicle capacity, to reduce either the number of travel lanes or the roadway width, and use the available public right-of-way to provide wider sidewalks, bicycle lanes, transit amenities, or landscaping.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-26.6: Require new development projects to provide pedestrian and bicycle/electric scooter facilities that connect to existing and planned pedestrian and bicycle facilities; and require large parking facilities to accommodate pedestrian, bicycle, and electric scooter circulation.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-26.14: Support completion of the pedestrian network by providing sidewalks or paths on at least one side of the street (preferably both sides where feasible) where they are missing and feasible. Crosswalks and sidewalks shall be universally accessible and designed for people of all abilities, wherever feasible.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-26.16: Encourage pedestrian activity by installing, maintaining, and where appropriate, enhancing existing crosswalks at both mid-block locations and all approaches of major intersections where feasible and where enhanced traffic control devices or roadway amenities would improve pedestrian access and safety.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-27.8: Consult with employers and transit providers to establish and maintain shuttle service serving major vehicle trip generating destinations in the City.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-31.5: Ensure that TDM programs initiated by private parties reduce projected traffic impacts.</li> </ul>	Consistent, with mitigation measures to address significant and unavoidable impacts where feasible.

**FINAL EIR TABLE 4-2 (Continued)****REVISED DRAFT EIR TABLE 4.9-1****CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

<b>General Plan Policy or Program</b>	<b>Conflict / Consistent</b>
<ul style="list-style-type: none"> <li>Policy BE-31.7: Balance business viability and land resources by maintaining an adequate supply of parking to serve demand while avoiding excessive parking supply that discourages non-automobile travel modes usage.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-31.9: Consider reducing parking requirements for mixed-use developments and for developments providing shared parking or a comprehensive TDM program, or developments located near major transit hubs.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BE-31.10: Encourage private property owners to share their underutilized parking with the general public and/or other adjacent private developments.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program BE-50: Off-Street Loading Requirements. As part of the project development review process, ensure that adequate off-street loading areas in new large commercial, industrial, and residential developments are provided, and that they do not conflict with pedestrian, bicycle, or transit access and circulation.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Program BE-52: Parking Demand Analysis. As part of the entitlement process, require large developments to complete a parking demand analysis that accounts for shared parking, TDM programs, and parking pricing to determine the appropriate parking supply. Encourage the use of parking reserve in landscaping concept (i.e., landscaping that can be converted to parking in the future if necessary) to ensure that excessive parking is not provided.</li> </ul>	Inconsistent: Use of the zoning code's parking requirement appears to oversupply, contrary to the goals for alternative transportation/GHG reductions, etc.
<ul style="list-style-type: none"> <li>Policy BC-5.2 (See <i>Land Use and Planning</i>)</li> </ul>	
<ul style="list-style-type: none"> <li>Policy BC-5.3: Provide connection between regional trails, county trails, and other jurisdictions' trail systems.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Policy BC-10.4: Look for innovative ways to involve employers, congregations, and developers in the provision of child care services and facilities, including possible impact fees.</li> </ul>	Consistent
<b>Multiple Factors</b>	
<ul style="list-style-type: none"> <li>Policy BE-22.2: Apply the following performance criteria and standards, as applicable, to all new development projects, with the level of application commensurate with the scale of development: <ul style="list-style-type: none"> <li>The development must result in a net positive fiscal impact to the City unless the City Council identifies unique circumstances for waiving this requirement.</li> </ul> </li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Adequate long-term water supplies must be available to serve the new development without impinging upon service to established and approved uses and developments. Adequacy must be fully documented to the satisfaction of the responsible City departments.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>The City's adopted service standards for pedestrian, bicycle, public transit usage, and motorized vehicle mobility must be achieved. Any circulation improvements or programs needed to maintain the established level of service standard must be programmed and funding committed for construction or implementation at the appropriate time.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>New development must plan for access to public transportation, including the potential streetcar system, transportation hub, and ferry terminal, as appropriate.</li> </ul>	Consistent
<ul style="list-style-type: none"> <li>Limit new development within the flood plain or ensure new development incorporates extra precautions into the site and building design to account for flood plain location.</li> </ul>	Consistent



**FINAL EIR TABLE 4-2 (Continued)**

**REVISED DRAFT EIR TABLE 4.9-1**

**CONSISTENCY WITH APPLICABLE GENERAL PLAN LAND USE POLICIES AND OTHER APPLICABLE REGULATIONS OR PLANS – REVISED PROJECT**

General Plan Policy or Program	Conflict / Consistent
– Storm drain, sewerage, and similar infrastructure improvements necessary to serve the development must be fully funded at the appropriate time, and any such improvements shall not place burdens upon nor otherwise impact tributary facilities.	Consistent
– Sufficient measures must be incorporated into project design and fully funded at the appropriate time to provide adaptation to and/or guard against potential damage from anticipated rises in sea levels.	Consistent
– Minimize direct or indirect impact to sensitive biological resources while optimizing the potential for mitigation.	Consistent
– Uses proposed must clearly be compatible with surrounding established and planned uses.	Consistent
– Development must support the City’s vision for the district or area in which it is proposed to be located.	Consistent
– Development must incorporate sustainability features, including features that minimize energy and water use, limit carbon emissions, provide opportunities for local power generation and food production, and provide areas for recreation.	Consistent
– The development must provide a measurable and/or clearly identifiable community benefit in the form of affordable housing, jobs generation, available parkland or open space, environmental hazard protection, and/or other criteria established by the City.	Consistent
– Require new development to pay its fair share of the cost of public facilities, services, and infrastructure, including but not limited to transportation, incremental water supply, sewer and wastewater treatment, solid waste, flood control and drainage, schools, fire and police protection, and parks and recreation. Allow for individual affordable housing projects to be exempted from the full cost of impact fees, subject to meeting specified criteria.	Consistent

## 4.3 Draft EIR Text Revisions

- 1) Draft EIR page 3-26 is revised, as described in response to comment 8-2:

### Access and Circulation Improvements

The Project will contribute to intersection improvements that include at Maple and Blomquist Streets include a traffic circle for traffic utilizing the Maple Street overcrossing to access the Project site. Also, proposed intersection improvements (signal) at Lyngso Lane and Seaport Boulevard are intended to minimize impacts to the existing truck traffic patterns. ~~As part of the Project's proposed community benefits (described below in 3.6 Community Benefits), Blomquist Bridge may be constructed over Redwood Creek to the north of the Project site, connecting Maple Street with Bair Island Road.~~ As previously mentioned, the Project site is also considered part of the *East 101 Fair Share Area* which includes transportation related infrastructure in those areas north of Highway 101 (as Highway 101 is referenced as running east-west in this EIR), and therefore will be contributing to its fair share of infrastructure as required by the City of Redwood City.

- 2) Draft EIR page 4.1-2: The following text is revised, as described in response to comment 14-1:

Areas nearest to the Project site are heavy industrial/commercial and construction equipment business uses, railroad tracks, and freeway and access to the Port of Redwood City access-via Seaport Boulevard. The industrial character to the north and east of the Project site includes large heavy industry facilities associated with Graniterock, Peninsula Building Materials, railroad tracks, and the Cargill salt evaporation ponds further east. The main east-west roadway along the northern frontage of the site is Blomquist Street, which is improved with consistent paving, curbs and sidewalks on the south side of the street. Uses along Blomquist Street include industrial and commercial businesses and associated heavy truck traffic, as well as the closed and demolished Malibu Golf and Grand Prix recreational facilities. Well-maintained fencing (chain link and wire/wood types) exists in front of the building materials storage uses along this road. A solid stone wall ~~exists~~ is present along the Blomquist Street frontage of the Graniterock concrete operation. Some landscaping and street trees ~~exist~~ are present along Blomquist Street, with decorative treatments and wider landscaped buffers between the sidewalks and property fencing/walls nearing Seaport Drive.

- 3) Draft EIR page 4.1-19: The following text is revised, as described in response to comment 8-2:

**Blomquist Bridge over Creek**

~~The potential new Blomquist Bridge crossing over Redwood Creek, while not yet designed, could cast new shadow on natural habitat areas in the creek. The bridge would cover existing open water and possibly affect existing riparian habit. The structure's width and elevation above the water are key considerations on the duration and area of shadow cast by the future structure. Conservatively, this analysis references mitigation measures in section 4.3, *Biological Resources*, in this chapter that will reduce potential effects to riparian habitat and wetlands that could apply to operation of the new bridge to less than significant.~~

~~The bridge would be implemented as transportation related infrastructure through the *East 101 Fair Share Area* in which the Project site exists. The Project will contribute to its fair share as required by the City of Redwood City. Specific study of the potential environmental effects of the bridge will occur during its discretionary review.~~

- 4) Draft EIR pages 4.3-2 through 4.3-5: The following text is revised, as described in response to comment 8-2:

***Habitat Types in the Project Vicinity***

Communities and habitat types occurring within and adjacent to the Project sites are described below. The vegetation/habitat classification presented herein is based on field observations (ESA, 2015) and the California Department of Fish and Wildlife (CDFW) *List of California Terrestrial Natural Communities Recognized by the CNDDDB* (CDFW, 2010). ~~This analysis addresses the potential new Blomquist Bridge extension to be constructed over Redwood Creek west of the Harbor View Project site that will be implemented as transportation related infrastructure through the *East 101 Fair Share Area* in which the Project site exists. As discussed below, a specific study of the potential environmental effects of the bridge will occur during its City review, after the bridge is designed and construction methods are determined. The Project will contribute to its fair share of utility related infrastructure in areas north of Highway 101 as required by the City of Redwood City.~~

**Tidal Marsh**

Tidal marsh habitat occurs on the margins of estuaries, lagoons, or bays with high salinity and protection from wave action. The lower margins of this habitat are exposed to air during tidal fluctuations, while higher areas can be exposed for months before being submerged. Very small patches of

low marsh vegetation are located along the banks of Redwood Creek ~~in the location of the proposed Blomquist Bridge in this habitat.~~

### **Developed and Ornamental Landscaping**

... Within the Harbor View Project site, the ornamental landscaping community is dominated by non-native species such as palms (*Phoenix* sp.), pine (*Pinus* sp.), bottlebrush (*Callistemon* sp.), and gum (*Eucalyptus* sp.), displacing native vegetation. Developed and ornamental landscaping occurs along the Docktown Marina parking lot, ~~east of the proposed Blomquist Bridge~~; within the Harbor View Project site; and along Blomquist Street and Seaport Boulevard.

### **Ruderal**

... Ruderal vegetation is common in ~~the vicinity of the upland portions of the proposed Blomquist Bridge, in addition to the various locations of Redwood Creek, east of and within the Harbor View project site.~~

### **Wetlands and Other Waters**

... Upstream of ~~Highway 101 the proposed Blomquist Bridge site~~, Redwood Creek continues as an open earthen tidal channel....

... In addition, Bay Conservation Development Commission (BCDC) regulates the fill, extraction of materials, and substantial changes in use of land, water, and structures within the bay and within 100 feet of the bay shoreline, which includes terrestrial or landside portions of Redwood Creek, east of the Project ~~the Blomquist Bridge site.~~

### **Special-Status Species**

A number of species known to occur in the vicinity of the Harbor View Project site and ~~the Blomquist Bridge site~~ Redwood Creek upstream of Highway 101 are protected pursuant to federal and/or state endangered species laws, or have been designated as species of concern by U.S. Fish and Wildlife Service (USFWS) or species of special concern by CDFW.

- 5) Draft EIR pages 4.3-14 and 4.3-15: The following text is revised, as described in response to comment 8-2:

~~As such, aquatic portions of the proposed Blomquist Bridge site occur within designated critical habitat for these two species.~~

### **Essential Fish Habitat**

The waters in Redwood Creek near the project site~~the vicinity of Blomquist Bridge~~, as part of South San Francisco Bay, are included in the listing of essential fish habitat....

- 6) Draft EIR page 4.3-18: The following text is revised, as described in response to comment 8-2:

...As such, the State Lands Commission oversees open water areas in the region; however, Redwood Creek within the area east of the project site ~~where the proposed Blomquist Bridge overcrossing is located~~ was granted to Redwood City in 1954. Thus, this agency does not have jurisdiction over the project.

- 7) Draft EIR pages 4.3-22 and 4.3-27: The following text is revised and mitigation measures deleted, as described in response to comment 8-2:

... Species considered special-status and analyzed in this EIR that have a moderate or higher potential to occur in or adjacent to ~~the proposed Blomquist Bridge site~~ Redwood Creek and Harbor View Project site and be exposed to impacts resulting from development of the Project are discussed below.

### **Special Status Aquatic Species**

The occurrence of special-status aquatic species, such as longfin smelt and Pacific herring, ~~within or adjacent to waters of the Blomquist Bridge construction site would be temporary in nature. These fish~~ do not permanently reside in this portion of the Bay waters; however, they have the potential to seasonally migrate through and forage in the Redwood Creek vicinity, ~~and thus are considered in this analysis~~. No impacts are anticipated to green sturgeon or steelhead, or critical habitat for these species since the Harbor View Project does not involve work in or adjacent to Redwood Creek. ~~Marine mammals that may intermittently occur in waters under or adjacent to the Blomquist Bridge site include harbor seal and California sea lion. Impacts to special status fish and marine mammals ranging from short term impacts on individual animals to permanent habitat effects could occur as a result of dredging, pile driving, bridge construction, or placement of fill within the Redwood Creek. Impacts typically associated with in water work activities may include temporary water quality degradation, increased turbidity due to in water construction, harmful underwater sound pressure levels associated with pile driving, short term loss of benthic habitat and associated benthos, and short term loss and disruption of fishery habitat.~~

**Noise Effects from Pile Driving.** Wood and steel piles that are driven within the water column can produce high intensity noise resulting in damage to soft tissues, such as gas bladders or eyes (barotraumas) and/or result in harassment of fish and marine mammals such that they alter swimming, sleeping, or foraging behavior or abandon temporarily forage habitat (Table 4.3-3). Protected and managed fish species, including salmon, longfin smelt, Pacific herring, anchovies, mackerel, sardine, soles, sanddab, and other bottom fish as well as harbor seal and California sea lion potentially use the Redwood Creek portion of the Project site as a transit corridor between the open ocean (via the Golden Gate) and South Bay.

**TABLE 4.3-3  
SINGLE-STRIKE SOUND LEVELS ASSOCIATED WITH DIFFERENT PILES  
(MEASURED AT 10 METERS FROM PILE)**

Pile Size/Type	Peak Pressure (dB)	RMS Sound Pressure (dB)	Sound Exposure Level (dB) <sup>†</sup>
12-inch Wood drop	177	165	157
12-inch Cast in shell steel (CISS) impact	190	180	165

NOTE:

<sup>†</sup> SEL for 1 second of continuous driving.

SOURCE: California Department of Transportation (Caltrans). 2009. Technical Guidance for Assessment and Mitigation of the Hydroacoustic Effects of Pile Driving on Fish. Final Report. Prepared for California Department of Transportation by ICF Jones & Stokes and Illingworth and Redkin, Inc. February 2009. [http://www.dot.ca.gov/hq/env/bio/files/Guidance\\_Manual\\_2\\_09.pdf](http://www.dot.ca.gov/hq/env/bio/files/Guidance_Manual_2_09.pdf).

The striking of a pile by a pile driving hammer creates a pulse of sound that propagates through the pile, radiating out through the water column, seafloor, and air. Vibratory pile drivers work on a different principal than pile driving hammers and therein produce a different sound profile. A vibratory driver works by inducting particle motion to the substrate immediately below and around the pile causing liquefaction of the immediately adjacent sediment, allowing the pile to sink downward or removed. Vibratory pile driving is only suitable where soft substrate is present. Sound levels are typically 10-20 decibels (dB) lower in intensity relative to the higher, pulse type noise produced by an impact hammer (Caltrans, 2009).

No design details of the proposed Blomquist Bridge over Redwood Creek are available; however, this analysis assumes the design of the of the Blomquist Bridge may require permanent in-water support footings or piers in Redwood Creek waters. Upon completion, the bridge would be constructed so that it is entirely suspended over the open water portion of Redwood Creek, and structural support would be located in the upland ruderal portions on either side of the creek. During construction, the use of

temporary pilings or shoring may be necessary to complete the construction of the bridge; however, the majority of the work would be based over water to reduce impacts to sensitive aquatic resources.

If the Project is to utilize in-water pilings or shoring during construction; all piles or shoring will be installed by vibratory methods to the maximum extent feasible. If desired tip elevation is not achieved, impact installation methods will be used.

Scientific investigations on the potential effect of noise on fish indicate that sound levels below 183 dB SEL do not appear to result in any acute physical damage or mortality to fish (barotraumas) of any size (Dalen, J. and G.M. Knutsen, 1986). Noise levels that result in startle responses in steelhead trout and salmon have been documented to occur at sound levels as low as 150 dB RMS (Halvorsen, MB., et al, 2012). It should be noted that the acoustic thresholds have been generated for impact pile driving, no criteria for vibratory pile driving exist at this time.

Caltrans reports a range in reduction from 0 to 30 dB depending on project conditions of the potential underwater sound levels generated from pile driving under attenuated conditions such as the use of bubble curtains (Caltrans, 2009). These results suggest the use of a bubble curtain for sound attenuation has the potential to dramatically reduce the distance at which harmful sound levels travel. Additionally, during pile driving activities, fish are not expected to be present within close proximity to the construction activity, since the movement of the pile on dry land or through the shallow water and initial contact with the Bay floor will result in any fish that are present to quickly leave the immediate area. Any disturbance to FESA or CESA listed fish species that results in altered swimming, foraging, movement along a migration corridor, or any other altered normal behavior is considered harassment.

If pile driving during Project construction is to occur, **Mitigation Measure BIO-1a: Noise Impacts from Pile Driving** will ensure that, in the unlikely event that special status aquatic species are present in the Project site vicinity during pile driving, the impact on these species would be less than significant with the implementation of the following measures.

**Mitigation Measure BIO-1a: Noise Impacts from Pile Driving**

The avoidance and minimization measures specific to pile driving activity, below, have been developed in accordance with the majority of the measures outlined in the 2013 NLAA program<sup>1</sup> criteria, in order to reduce

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<sup>1</sup> U.S. Army Corps of Engineers Proposed Procedures and Criteria for Permitting Projects Under a Programmatic Determination of Not Likely to Adversely Affect Select Listed Species or Critical Habitat

Project effects on sensitive resources. In coordination with the City of Redwood City, a NMFS-approved biological monitor will conduct daily surveys before and during any impact hammer pile driving to inspect the work zone and adjacent waters for marine mammals. The monitor will be present as specified by NMFS during the impact pile driving phases of construction. If no in-water activity is proposed, biological monitoring would not be required. Avoidance and minimization measures that will reduce Project noise effects, including the following, shall be implemented to the satisfaction of the City:

- ~~To the extent feasible all piles (30-inch and 66-inch) will be installed using a vibratory hammer. Vibratory pile installation will be conducted in accordance with the USACE's "Proposed Additional Procedures and Criteria for Permitting Projects Under a Programmatic Determination of Not Likely to Adversely Affect Select Listed Species in California."~~
- ~~Construction-related sound exposure shall be limited to 206-dB peak and 187-dB accumulated SEL for all listed fish weighing two grams or more. Conditions during all pile driving shall be monitored at approximately 33 feet (10 meters) for the first five piles driven or for two full days of pile driving, whichever is greater, to ensure that sound pressure levels comply with the sound thresholds. In the event of use of an impact hammer, or observed exceedance of the sound thresholds, a cushion, bubble curtain, jetting, or other sound attenuation method will be utilized to reduce sound levels. If sound level criteria are still exceeded with the use of attenuation methods, the contractor will revise sound attenuation methods and monitor an additional five piles or for two days of driving, whichever is greater, until demonstration of compliance is obtained, and the demonstrated methods shall be used for the remainder of the pile driving.~~
- ~~If attenuation methods fail to reduce sound levels below NMFS thresholds for marine mammal harassment (160-dB root-mean-square sound pressure level [RMS] or greater for impulse sounds [e.g., impact pile driving] and 120-dB RMS for continuous noise [e.g., vibratory pile driving]), a 1,600-foot (500-meter) open-water safety zone shall be maintained. At the discretion of the resource agencies (USACE and NMFS in particular), the size or configuration of the marine mammal safety zone may change based on the findings of sound attenuation monitoring that will be performed during pile driving.~~



- ~~Work activities shall be halted when a marine mammal enters the 1,600-foot safety zone and resume only after the animal has been gone from the area for a minimum of 15 minutes.~~
- ~~A “soft start” technique shall be employed when initiating impact pile driving to provide marine mammals the opportunity to vacate the area.~~

**Significance after Mitigation:** Less than Significant

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~~**Localized Turbidity.** The Project, through the potential in-water work associated with the construction of the Blomquist Bridge, has the potential to temporarily impair water quality conditions within and adjacent to the Project site. These construction activities may result in the short-term disturbance and resuspension of benthic sediments. Sediment resuspension has the potential to increase the exposure of potential harmful chemicals sequestered in the sediment to aquatic receptors in the immediate area, and result in adverse water quality and biological effects, including special status fish.~~

~~Suspended sediments in the water column can lower levels of dissolved oxygen, increase salinity, increase concentrations of suspended solids, and possibly release chemicals present in the sediments into the water column. However, increased turbidity levels would be relatively short-lived and generally confined to within a hundred yards of the activity. After initially high turbidity levels, sediments would disperse and background levels would be restored within hours of disturbance. In addition, normal circulation and currents within the Redwood Creek channel would rapidly circulate and disperse water temporarily affected by construction activities.~~

~~In-water or above-water work which is minimal in nature and has low potential to result in adverse effects to biological resources is proposed for year-round authorization. Activities proposed for year-round authorization, include above-water bridge construction and concrete repairs (such as small repairs and coating repairs to hardware). Stormwater treatment measures during construction would be implemented in accordance with local stormwater management plans. Impacts to aquatic resources during construction as a result of increased turbidity and temporary fill would be further minimized to less than significant with the implementation of the following **Mitigation Measure BIO-1b: Seasonal Avoidance for Aquatic Species.**~~

~~**Mitigation Measure BIO-1b: Seasonal Avoidance for Aquatic Species**~~

This measure applies only to pile driving activities that are performed within aquatic habitat. Pile driving will be conducted within seasonal work windows identified to reduce potential impacts on special status species (i.e., work will be conducted from June 1—November 30). If any in-water work is proposed during the Pacific herring spawning or hatching season (December 1—February 28), a CDFW approved herring monitor will monitor the Project site daily, and at any time when in-water construction activity is taking place.

In the event that the on-site monitor detects herring spawning at, or within 200 meters of in-water construction activity, the in-water construction activity will be shut down for a minimum of 14 days, or until the monitor determines that the hatch has been completed and larval herring have left the site. The in-water activity may resume thereafter.

**Significance after Mitigation:** Less than Significant

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**Water Quality.** Contaminants bound to suspended sediments could also degrade water quality by reducing dissolved oxygen concentrations in the water column and contaminants could leach into the water from the sediments. Substantially depressed oxygen levels (i.e., below 5.0 mg/l) may cause respiratory stress to aquatic life, and levels below 3.0 mg/l may cause mortality. However, oxygen level depression resulting from Project construction activities is not expected to remain depressed for long periods. First, tidal flushing would be expected to ameliorate depressed oxygen levels by the ongoing introduction of oxygenated water into the Project site waters. Second, releases of anoxic (oxygen-poor) sediment would occur for relatively short time periods.

Water quality impacts could result from over-water or potential in-water construction of Blomquist Bridge over Redwood Creek. However, any water quality impacts related to the Project would be less than significant. Project compliance with NPDES General Construction Activities Permit requirements are required by law and have proven effective in protecting water quality at construction sites. Routine inspection of all BMPs is required under the provisions of the Construction General Permit. In addition, the SWPPP is required to contain a visual monitoring program, a chemical monitoring program for non-visible pollutants, and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Implementation of the SWPPP at the Project site would prevent significant construction-related impacts to water quality by ensuring that all construction activities include the implementation of BMPs that minimize the offsite discharge of sedimentation and other pollutants.

- 8) Draft EIR page 4.3-27: The following text is revised in response to comment 8-2:

**Nesting Birds.** Special-status birds are not expected to nest in the Harbor View Project site ~~or in the vicinity of the Blomquist Bridge site~~. Potential foraging habitat for special status bird species, such as Ridgway's rail, California black rail, double-crested cormorant, Alameda song sparrow, western snowy plover, California least tern, northern harrier, white-tailed kite, great blue heron, saltmarsh common yellowthroat, and short-eared owl is located in the saltmarsh habitat approximately 200 feet southwest of the ~~Blomquist Bridge Project site~~ Redwood Creek east of the Project site and approximately 1,000 feet north of the Project site....

... However, there still is potential for construction noise and tree removal from the proposed Project to impact migratory bird and raptor nests in Canary Island pine, Mexican fan palm, gum and similarly tall densely foliated trees found throughout the Harbor View Project site ~~or in the vegetation bordering the Redwood Creek channel near the Blomquist Bridge site~~. The Highway 101 roadway bridge could also provide suitable nesting bird habitat in the bridge's overhangs or crevices. All raptors, their nests, and eggs are protected under Fish and Game Code 3503.5. In addition, Fish and Game Code 3503 protects the needless destruction of nests or eggs of most passerine bird species. Other common birds that could be found nesting in ruderal or ornamental landscape habitat, vacant commercial or industrial buildings, include Canada goose, killdeer, mourning dove, black phoebe, red-winged blackbird, rock dove, and others.

Increased noise and activity resulting from Project construction, were it to exceed ambient levels, could cause nest abandonment and death of young or loss of reproductive potential at active nests located in the vicinity of the Project sites. In addition, removal of ~~6897~~ trees and other vegetation at the Harbor View Project site could result in direct losses of nests, eggs, or nestlings. Such impacts on nesting birds would be considered significant. However, implementation of **Mitigation Measure BIO-1c: Nesting Bird Measures** below would reduce impacts on nesting birds to less than significant levels.

- 9) Draft EIR pages 4.3-30 through 4.3-32: The following text is revised in response to comment 8-2:

~~**Impact BIO-2: The Project's construction of the Blomquist Bridge crossing of Redwood Creek could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act or state**~~

**~~protected wetlands through the direct removal, filling, hydrological interruption, or other means (Criterion c). (Potentially Significant)~~**

~~As discussed in the *Setting* in this section, the Project sponsor would contribute to the Blomquist Bridge project as part of its community benefit. This transportation related infrastructure improvement would occur through the *East 101 Fair Share Area*. The bridge is not yet designed. As discussed below, specific study of the potential environmental effects of the bridge will occur during its City review.~~

~~San Francisco Bay is considered a navigable water of the United States and is therefore considered jurisdictional waters of the U.S. regulated by the Corps under Section 404 of the CWA up to the high tide line, and under Section 10 of the Rivers and Harbors Act up to the mean high water mark. These waters also are regulated by the RWQCB as Waters of the State and by BCDC, which has jurisdiction over all areas of San Francisco Bay that are subject to tidal action, as well as a 100-foot shoreline band. The waters of Redwood Creek and tidal marsh vegetation within the creek corridor are likely to be considered potential jurisdictional other waters and wetlands also regulated by the Corps, RWQCB, and BCDC. Construction of the Blomquist Bridge over Redwood Creek channel, could result in the fill or water quality impacts on waters of the U.S., waters of the state, or navigable waters, which would be considered a significant impact.~~

~~No design details of the proposed Blomquist Bridge over Redwood Creek are available. Construction of the bridge over Redwood Creek could impact wetlands and other waters of the U.S. and State in Redwood Creek under the jurisdiction of the Corps, RWQCB, and BCDC through temporary or permanent placement of fill material during construction, and/or installation of the bridge that would shade portions of the Redwood Creek channel, which would be a significant impact. Collectively, these regulatory agencies and the permits and authorizations they issue for the project will require that fill of wetlands and waters shall be avoided or minimized to the maximum extent practicable (e.g., design the bridge to be placed above areas defined as waters of the U.S./waters of the state) while still accomplishing the project's purpose, and will specify an array of measures and performance standards as conditions of project approval. In addition, any unavoidable impacts to wetlands and other waters will trigger a requirement for compensatory mitigation that will be aimed at creating, restoring, or enhancing similar ecological functions and services as those displaced. The types, amounts, and methods of compensatory measures required will differ between the permitting agencies depending on the specific resources they regulate and the policies and guidelines they implement.~~

~~Compliance with project permits and authorizations, and implementation of **Mitigation Measure BIO-2a, Conduct Wetland Delineation** and **Mitigation Measure BIO-2b, Avoidance and Protection of Jurisdictional Wetlands and Other Waters**, would identify potentially jurisdictional wetlands and other waters within the project site and reduce potential impacts such features to a less than significant level. Note, however, that even if no fill is proposed within jurisdictional features, BCDC authorization would still be needed for the Project due to its near proximity to the San Francisco Bay shoreline. Should avoidance of direct impacts to wetlands or other waters through placement of fill in support of the bridge be infeasible, implementation of **Mitigation Measure BIO-2c, Compensation for Impacts to Wetlands and Waters** would reduce the impacts associated with this direct loss to a less than significant level.~~

~~**Mitigation Measure BIO-2a: Conduct Wetland Delineation:**~~

~~In coordination with the City of Redwood City, a qualified wetland ecologist shall conduct a wetland delineation of the project site to identify the limits of potential wetlands and other waters within the project study area (i.e., Redwood Creek and associated tidal marsh vegetation, and San Francisco Bay) under the jurisdiction of the U.S. Army Corps of Engineers (Corps), the Regional Water Quality Control Board (RWQCB), and Bay Conservation and Development Commission (BCDC). Features shall be mapped and documented in a report for submission to the Corps, RWQCB, and BCDC which retains authority over such features within and connected to San Francisco Bay.~~

~~**Mitigation Measure BIO-2b: Avoidance and Protection of Jurisdictional Wetlands and Other Waters:**~~

~~Access roads, staging and work areas, and infrastructure [i.e., Blomquist bridge] shall be sited to avoid and minimize direct and indirect impacts to wetlands and waters to the extent feasible. Where work will occur on the project within or adjacent to State and federal jurisdictional wetlands and waters, protection measures shall be applied to protect these features to the satisfaction of the City. These measures shall include the following:~~

- ~~● To the maximum extent feasible, conduct work in creek channels and associated tidal marsh vegetation during the dry season (between June 15 and October 15) to avoid construction activities in flowing streams (typically during the spring and winter). Where water features must be disturbed in support of the project (e.g., installation of a coffer dam or other temporary diversions to isolate flow from the work area), the minimum area of disturbance necessary for construction shall be identified, and the area outside of that shall be avoided.~~

- ~~Stabilize disturbed, exposed slopes and creek banks immediately upon completion of construction activities [e.g., following pedestrian bridge(s) construction/installation] to prevent any soil or other materials from entering aquatic habitat. Plastic monofilament of any kind (including those labeled as biodegradable, photodegradable, or UV degradable) shall not be used. Only natural burlap, coir, coconut or jute wrapped fiber rolls and mats shall be used.~~
- ~~A protective barrier (such as silt fencing) shall be erected around wetland or water features (i.e., San Francisco Bay, Redwood Creek and associated tidal marsh vegetation) to isolate them from project construction activities and reduce the potential for incidental fill, erosion, or other disturbance. A fencing material meeting the requirements of both water quality protection and wildlife exclusion may be used;~~
- ~~Signage shall be installed on the fencing to identify sensitive habitat areas and restrict construction activities beyond fenced limits;~~
- ~~No equipment mobilization, grading, clearing, storage of equipment or machinery, or similar activity shall occur at the project site until a representative of City has inspected and approved the wetland/waters protection fencing;~~
- ~~Ensure that the temporary fencing is continuously maintained until all construction is completed; and~~
- ~~Drip pans and/or liners shall be stationed beneath all equipment staged nearby jurisdictional features overnight to minimize spill of deleterious materials into jurisdictional waters. Equipment maintenance and refueling in support of project implementation shall be performed in designated upland staging areas and work areas, and spill kits shall be available on-site. Maintenance activity and fueling must occur at least 100 feet from jurisdictional wetlands and other waters or farther as specified in the project permits and authorizations.~~

#### **Mitigation Measure BIO-2c: Compensation for Impacts to Wetlands and Waters.**

~~To offset temporary impacts, restoration to pre-project conditions (typically including contours, topsoil, and vegetation) shall be conducted, as required by regulatory permits (e.g., those issued by the Corps, RWQCB, and BCDC) and to the satisfaction of City. To offset unavoidable permanent impacts to jurisdictional wetlands and waters associated with project fill or shading, compensatory mitigation shall be provided as required by regulatory permits and at a minimum ratio of 2:1 (created/restored/enhanced: impacted). Compensation may include on-site or off-site creation, restoration, or enhancement of jurisdictional resources, as determined by the permitting agencies. On-site or off-site creation/restoration/enhancement plans must be prepared by a qualified biologist prior to construction and approved by the permitting agencies. Implementation of creation/restoration/enhancement~~

~~activities by the permittee shall occur prior to project impacts, whenever possible, to avoid temporal loss. On or off site creation/restoration/enhancement sites shall be monitored by the City or their consultant for at least five years to ensure they successfully meet performance criteria.~~

~~**Significance after Mitigation:** Less than Significant~~

10) Starting on Draft EIR page 4.3-32: The following text is revised in response to comment 8-25:

**Impact BIO-3: The Project could substantially interfere 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 (Criterion d). (Less than Significant)**

As discussed above, the Project site is located in a regionally-sensitive natural area, with extensive salt marsh, tidal flat, and salt pond habitats in the immediate vicinity of its commercial and industrial activities. Therefore, there is a low potential for the Project to impact resident and migratory fish and wildlife corridors or impede the use of native wildlife nursery sites.

#### **Avian Collisions with Buildings and Night Lighting**

The Project site vicinity is located within the Pacific Flyway along the western shoreline of San Francisco Bay. While exact migratory corridors through the area are unknown and vary by species, birds typically follow coastlines, rivers, and mountain ranges in their migratory passages from wintering to breeding grounds and back again. The Project site could provide foraging and roosting habitat for migratory species. Although development in the vicinity of proposed Project is currently illuminated during the nighttime and existing commercial and industrial developments and Highway 101 have increased ambient lighting over the recent years, development proposed under the proposed Project would increase ambient light and glare levels associated with the potential use of reflective building materials, street light fixtures, nighttime lighting of commercial identification signs and logos, and increased vehicle and transit use.

~~Development of the Project may increase the risk of bird collisions over that posed by existing structures. For new buildings, reflective building façades that are generally located in a clear flight path from water features can create hazards for birds. Other potential feature-related hazards new development can pose to birds include glass courtyards, transparent building corners, or clear glass walls on rooftops or balconies. When considering the Project site location along a known migratory route, proximity to the bay, the large area of exterior glass surfaces, and the presence of frequent shoreline fog which can adversely affect avian~~

~~navigation awareness, the Harbor View Project development could increase the risk of avian collisions. If the buildings' exterior surfaces were to be reflective and not incorporate elements to avoid or minimize avian collisions, it is foreseeable that an unknown number of songbirds or waterbirds could collide with new structures and could result in injury or fatality. Accordingly, the following mitigations measures are required and will reduce impacts:~~

~~Due to recent changes to the federal MBTA, the incidental "take" of migratory bird species is not prohibited by the MBTA or Fish and Game Code (USDOJ, 2017; USFWS, 2018). Because the take of migratory birds is not prohibited by CDFW or by the MBTA based on federal guidance, potential impacts to avian species from collision with new buildings would be less than significant with no mitigation required.~~

~~Nonetheless, it is recommended that the Project applicant incorporate bird safe measures into the building design that would reduce the potential for avian collisions. These include, but not limited to, the use of exterior glass treatments (use of non-reflective glass through tinting, glazing and/or fritting that reduces transmission of light out of the building), as well as exterior façade and lighting treatments.~~

**Mitigation Measure BIO-3a: Bird-Safe Building Requirements.** To the extent feasible, bird-safe glazing treatments (e.g., fritting, frosting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing, or ultraviolet patterns visible to birds) shall be used to reduce the extent of untreated glass to less than 10 percent on each of the Project buildings.

**Mitigation Measure BIO-3b: Lighting Requirements.** The Project shall implement Bird-Safe lighting design and operations, to include the following: 1) The built environment should be designed to minimize light pollution including: light trespass, over-illumination, glare, light clutter, and skyglow while using bird-friendly lighting colors when possible; 2) Unneeded interior and exterior lighting shall be turned off from dusk to dawn during migration periods, defined here as February 15 through May 31 and August 15 through November 30; 3) At all times, rooms where interior lighting is used at night should have window coverings that adequately block light transmission, and motion sensors or controls to extinguish lights in unoccupied spaces.

Significance after Mitigation: Less than Significant

- 11) Starting in the middle of the first paragraph on Draft EIR page 4.3-34: The following text is revised to reflect the Revised Project:



The Project would not conflict with the City’s tree ordinance, as the City’s Municipal Code requires the project applicant to apply for and implement a tree removal permit (Redwood City Municipal Code 35.3) for the ~~6897~~ trees to be removed, in addition to implementing **Mitigation Measure BIO-4: Tree Protection Measures** for the ~~5122~~ trees that will remain in the Project site that could potentially be affected by construction activity. Thus, this impact would be less than significant following mitigation.

12) Draft EIR page 4.6-22: Table 4.6-8 for the Draft EIR Project is modified as shown below, as discussed in response to comment 2-1, and then updated as shown further below to reflect the Revised Project:

**DEIR TABLE 4.6-8 (MODIFIED)  
GHG EMISSIONS INVENTORY FOR THE DRAFT EIR PROJECT**

Emission Source	Total Emissions (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
Area Sources	0.09	<0.01	0.00	0.10
Energy Sources	4,086.11	0.31	0.08	4,118.33
Mobile Sources	5,570.95	0.20	0.00	5,576.01
Solid Waste	222.72	13.16	0.00	551.77
Water and Wastewater	114.57	0.13	0.08	142.29
<b>Total</b>	<b>9,994.43</b>	<b>13.81</b>	<b>0.16</b>	<b>10,388.50</b>
Amortized Construction Emissions over 30 Years				<u>150.87</u> <del>449.80</del>
<b>Operation including Construction Total</b>				<b><u>10,539.37</u></b> <del>10,538.30</del>
Project level Significance Threshold				1,100
<b>Exceeds Significance Threshold?</b>				<b>Yes</b>
Service Population (4,579 employees)				4,579
<b>Total Project GHG Emissions by Service Population</b>				<b>2.3</b>
Project level 2020 Significance Threshold				4.6
<b>Exceeds 2020 Significance Threshold?</b>				<b>No</b>
Project level 2030 Significance Threshold				2.8
<b>Exceeds 2030 Significance Threshold?</b>				<b>No</b>

NOTE: Columns may not total precisely due to rounding.

SOURCE: ESA, 2018 (Appendix C)

**DEIR TABLE 4.6-8  
GHG EMISSIONS INVENTORY FOR THE REVISED PROJECT**

<u>Emission Source</u>	<u>Revised Project Total Emissions<sup>a</sup> (MT/Year)</u>			
	<u>CO<sub>2</sub></u>	<u>CH<sub>4</sub></u>	<u>N<sub>2</sub>O</u>	<u>Total CO<sub>2</sub>e</u>
<u>Area Sources</u>	<u>0.06</u>	<u>&lt;0.01</u>	<u>&lt;0.00</u>	<u>0.06</u>
<u>Energy Sources</u>	<u>1,970.6</u>	<u>0.21</u>	<u>0.04</u>	<u>1,987.0</u>
<u>Mobile Sources<sup>b,c</sup></u>	<u>10,601.3</u>	<u>0.68</u>	<u>0.45</u>	<u>10,751.9</u>
<u>Solid Waste</u>	<u>151.1</u>	<u>8.9</u>	<u>&lt;0.00</u>	<u>374.2</u>
<u>Water and Wastewater</u>	<u>91.4</u>	<u>0.14</u>	<u>0.08</u>	<u>118.9</u>
<u>Total</u>	<u>12,814.4</u>	<u>9.95</u>	<u>0.57</u>	<u>13,232.1</u>
<u>Amortized Construction Emissions over 30 Years</u>				<u>137.6</u>
<u>Required reduction from no natural gas per Redwood City Reach Code</u>				<u>-391.7</u>
<u>Required reduction from onsite solar per Redwood City Reach Code<sup>d</sup></u>				<u>=</u>
<u>Required reduction from EV charging infrastructure per Redwood City Reach Code</u>				<u>-615.0</u>
<u>Reduction from zero carbon electricity committed to, as part of project</u>				<u>-1,595.3</u>
<b><u>Total Project Emissions</u></b>				<b><u>10,767.8</u></b>
<u>Service Population (3,061 employees)</u>				<u>3,061</u>
<b><u>Project Emissions per Service Population</u></b>				<b><u>3.5</u></b>
<u>Project level 2020 Significance Threshold</u>				<u>4.6</u>
<b><u>Exceeds 2020 Significance Threshold?</u></b>				<b><u>No</u></b>
<u>Project level 2030 Significance Threshold</u>				<u>2.8</u>
<b><u>Exceeds 2030 Significance Threshold?</u></b>				<b><u>Yes</u></b>
<u>Emissions Reduction needed from TDM Mitigation Measure</u>				<u>2,228</u>
<u>% Reduction in VMT needed from TDM Mitigation Measure</u>				<u>20.7</u>
<b><u>Mitigated Project Emissions</u></b>				<b><u>8,540</u></b>
<b><u>Mitigated Project Emissions per Service Population</u></b>				<b><u>2.79</u></b>
<b><u>Exceeds 2030 Significance Threshold?</u></b>				<b><u>No</u></b>

**NOTES:**

- Emissions estimated using CalEEMod 2020.4.0 for first operational year of 2025.
- Includes emissions from increased trip generation based on the City's updated traffic methodology.
- Includes project-specific VMT adjustment based on a factor calculated by dividing VMT data provided by F&P for the Revised Project without ice rink with the default VMT estimated by CalEEMod (Table 1).
- Excludes GHG reduction from onsite solar to avoid double counting some of the reduction taking place through use of zero carbon electricity.

Columns may not total precisely due to rounding.

SOURCE: ESA, 2022

13) Draft EIR page 4.7-13: The following mitigation measure is revised in response to comments 2-2 and 12-1:

**Mitigation Measure HAZ-1b:** Prior to the issuance of an grading occupancy permit, the Project applicant shall record a Land Use Covenant (LUC), in a form approved by the City, that requires that the SMP to be followed during future earthwork activities during and post-development. The LUC shall include conditional language describing when

implementation of the SMP will be required for earthwork activities beneath either hardscaped areas or a beneath a specified thickness of clean fill or marker fabric required for non-hardscaped areas. The LUC shall also include language to prohibit the use of groundwater beneath the Project site and be recorded with the DTSC.

- 14) Draft EIR page 4.8-17: The following mitigation measure is updated in response to comment 10-9:

**Mitigation Measure HYD-5: Pump Station Infrastructure.** Prior to issuance of a certificate of occupancy for the Project, the Project sponsor shall install a new redundant duty pump at the Oddstad Pump Station and a new redundant duty pump at the Seaport Pump Station, pursuant to the *Inner Harbor Specific Plan Utilities Engineering Report* prepared by West Yost for the City of Redwood City, April 2015, and new stormwater mains to connect to the Seaport Boulevard Public Station, both in accordance with all applicable City of Redwood City Engineering Standards, to the satisfaction of the City. The Project sponsor shall receive a credit for costs of the infrastructure work above the proportionate share of potential new development attributable to the Project, as determined by City.

**Significance after Mitigation:** Less than Significant

- 15) As shown in Section 4.2 of this chapter of this Final EIR, Draft EIR page 4.9-5: Draft EIR Table 4.9-1 is revised in response to comment 14-2 and as shown above in Table 4-2 in this Final EIR chapter.

- 16) Draft EIR page 4.11-4: The following table is revised as follows in response to Comment 10-8, and as discussed in Master Response 3 regarding jobs/housing balance in Chapter 5, and in response to comment 10-8 in Chapter 6:

**TABLE 4.11-3  
ESTIMATED JOB TRENDS AND GROWTH FOR REDWOOD CITY AND SAN MATEO COUNTY –  
2010 TO 2040**

	2010	2018	2030	2040	Change, 2018-2040	Percent Change, 2018-2040
<b>Redwood City</b>						
Total jobs	58,080	68,240	73,330	77,480	9,240	13.5%
Total households	27,957	30,316	33,880	36,860	6,544	21.6%
Total jobs per household	<del>2.08269</del>	<del>2.2523</del>	2.16	<del>2.10273</del>	0.43	18.6
Total employed residents	36,460	41,688	45,310	48,630	6,942	16.6

	2010	2018	2030	2040	Change, 2018-2040	Percent Change, 2018-2040
<b>San Mateo County</b>						
Total jobs	345,190	394,506	421,500	445,070	50,465	12.8%
Total households	257,837	273,810	296,280	315,100	41,290	15.1%
Total jobs per household	1.33	1.44	<del>1.422-79</del>	1.41	-0.03	-2.1%
Total employed residents	342,060	386,448	413,740	438,770	+52,332	13.5%

Year 2018 data interpolated from Years 2015 and 2020 ABAG Data

SOURCE: ABAG, 2013, *Projections 2013*

17) Draft EIR page 4.11-10: The following text is revised per response to comment 10-8:

...In 2018, Redwood City is estimated to have 68,240 jobs (see Table 4.11-3) and approximately 30,693 housing units (see Table 4.11-2) — a jobs/housing ratio of 2.25 jobs to housing unit. Stated another way, in 2018, of the 68,240 jobs in Redwood City, 61 percent (41,688) are employed residents (see Table 4.11-3), reflecting a net daily inflow of 26,552 workers to the city.

18) Draft EIR page 4.13-13: The following text is revised per response to comment 8-37 and new Table 4.13-1 is added to address the Final WSA for the Revised Project:

**Impact UTIL-2: The water demand generated by the Project would not exceed water supplies available from existing entitlements and resources or require or result in the construction of new water treatment facilities or expansion of existing facilities (Criteria b and d). (Less than Significant)**

#### **Demand / Supply**

~~Based on the 2018 report prepared by BKF Engineers, the existing water demand (domestic and irrigation) for the site is 27,506 gpd~~ currently minimal, and is restricted to uses associated with the existing building materials operations along Blomquist Street. Under Project conditions, with the connection to recycled water, the proposed water demand would be approximately 33,263 gpd of potable water and 154,339 gpd of recycled water, for a total water demand of 187,602 gpd. Assuming that potable water consumption on the site is currently near zero, ~~this would increase the potable water demand by approximately 5,757~~ 33,263 gpd. The Project will also be required to meet the required fire flow velocities and flow durations pursuant to current fire code (BKF Engineers, 2018) and pursuant to Redwood City Engineering Standards. Further, the City is not currently constrained in supplying additional recycled water supplies to customers (Redwood City, 2015b).

A WSA was conducted but not approved for the 2015 Harbor View Project (included as Appendix I to the 2015 *Inner Harbor Specific Plan and Harbor View Projects Draft EIR*). The WSA was based on the site’s then-existing potable water demand of 27,506 gpd, and found that the net increase in demand with the Inner Harbor Specific Plan Project would be a net increase of 5,830 gpd (compared to 5,757 gpd with the currently proposed Project).

The City’s Public Works Services Department prepared a Final WSA for the proposed development, which is included in the appendix.

**NEW TABLE 4.13-1  
REVISED PROJECT WATER DEMAND (AFY)**

	<u>Existing Demand</u>	<u>Proposed Project Demand</u>	<u>Potable Demand</u>	<u>Recycled Demand</u>	<u>Net New Potable Demand</u>
<u>Commercial</u> <sup>a</sup>	0.0	131.0	26.2	104.8	26.2
<u>Irrigation</u>	0.0	26.7	0.0	26.7	0.0
<u>Total</u>	0.0	157.7	26.2	131.5	26.2

<sup>a</sup> Potable water for Commercial uses is 20% of Proposed Project Demand, Recycled Water is 80% of Proposed Project Demand.

SOURCE: City of Redwood City, Public Works Services Department, 2022

19) Draft EIR p. 4.14-31: The following Table 4.14-8 is updated to address the Revised Project:

**UPDATED TABLE 4.14-8  
PROJECT GENERATED VMT ESTIMATES**

	<b>Daily Vehicle Trips</b>	<b>Total Daily VMT Generated</b>	<b>Employee Estimate</b>	<b>VMT Per Employee</b>
<b>Draft EIR Project</b>	8,090	88,990	3,434 <sup>a</sup>	25.9
<b>Revised Project</b> <sup>b</sup>	<u>8,717</u>	<u>95,889</u>	<u>3,061</u>	<u>31.3</u>

<sup>a</sup> Employee estimates based on ITE Trip Generation estimates for employees per 1,000 square feet of office.

<sup>b</sup> Values are greater than the smaller Draft EIR Project due to updated employee density and average trip lengths applied to the Revised Project (see Master Response 3 in Chapter 5 of this Final EIR).

SOURCE: Fehr & Peers, 2018.

20) Starting on Draft EIR p. 4.14-37: The following text is modified to clarify the Draft EIR and in response to comment 10-3:

**Impact TRANS-2: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Potentially Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at intersection #11 Woodside Road / Middlefield Road, which currently operate at LOS F.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-2A:** The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.

~~In addition to the capacity increase along Woodside Road as outlined in Mitigation Measure TRANS-2A, an~~ An additional mitigation measure could ~~would be required to improve~~ intersection operations at the intersection of Woodside Road / Middlefield Road. The measure would involve the ~~Mitigation Measure TRANS-2B: Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ construction of geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left-turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.

~~Implementation of this~~ these ~~geometric changes~~ mitigation measure would improve operations at the Woodside Road / Middlefield Road study intersection in both the AM and PM peak hours and would reduce impacts to less than significant levels. However, ~~the geometric changes listed in Mitigation Measure TRANS-2B~~ these changes are not consistent with recently constructed and future City plans at this location. Therefore, these additional geometric changes cannot be implemented.

Overall, implementation of Mitigation Measure TRANS-2A would reduce impacts. However, because of the City's lack of authority to independently implement this measure and the infeasibility of the changes discussed above, this impact remains significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

- 21) Draft EIR page 4.14-43: The following text is modified to clarify the Draft EIR and in response to comment 10-3:

**Impact TRANS-8: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Intersection #11) (Criteria a and b). (Potentially Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at intersection #11 Woodside Road / Middlefield Road, which currently operate at LOS F.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-8A:** The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.

~~In addition to the capacity increase along Woodside Road as outlined in Mitigation Measure TRANS-8A, an~~ An additional mitigation measure could ~~would be required to improve intersection operations at the intersection of Woodside Road / Middlefield Road. **The measure would involve the**~~ **Mitigation Measure TRANS-8B:** ~~Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ construction of geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left-turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.

Implementation of this mitigation measure would improve operations at the Woodside Road / Middlefield Road study intersection in both the AM and PM peak hours and would reduce impacts to less than significant levels. However, ~~the geometric changes listed in Mitigation Measure TRANS-8B~~ these changes are not consistent with recently constructed and future City plans at this location. Therefore, these additional geometric changes cannot be implemented.

Overall, implementation of Mitigation Measure TRANS-8A would reduce impacts. However, because of the City's lack of authority to independently implement this measure and the infeasibility of the changes discussed above, this impact remains significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

22) Starting on Draft EIR page 4.14-73: The following text modified to clarify the Draft EIR and in response to comment 10-3:

**Impact TRANS-23: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at the intersections of #10 Bay Road at Woodside Road and #11 Woodside Road / Middlefield Road, both of which operate at an unacceptable LOS during the AM and/or PM peak hours without the Project.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-23A:** Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.

~~In addition to the capacity increases along Woodside Road as outlined in Mitigation Measure TRANS-23A, several a~~ Additional mitigation measures ~~could~~ would be required to improve intersection operations further along the Woodside Road corridor as set forth below.



~~**Mitigation Measure TRANS-23B:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ An additional measure could implement geometric changes to intersection #10 Bay Road/Woodside Road to the satisfaction of the City. Changes are to would convert the eastbound (Bay Road) approach to a left-turn pocket of 100 feet, one through lane, and a shared through-right lane, add a northbound (Woodside Road) through lane, and convert the westbound approach to a right-turn pocket of 250 feet, a left-turn pocket of 250 feet, and three westbound through lanes. Additionally, the overall cycle length shall could be optimized while adding protected left-turn phases for both the westbound and eastbound movements.

~~**Mitigation Measure TRANS-23C:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ Another additional measure could implement geometric changes to intersection #11 Woodside Road/Middlefield Road to the satisfaction of the City. Changes are to could modify the westbound (Middlefield Road) approach to two left-turn lanes with 400-foot pockets, one through lane, and one shared through-right lane with a 100-foot pocket.

~~Implementation of Mitigation Measures TRANS-23B and TRANS-23C~~ The possible geometric changes described above would result in the intersections #10 and #11 still operating at unacceptable levels but within the five second threshold. However, these geometric changes listed are not consistent with recently approved and future City plans at these locations. Additionally, there is insufficient right-of-way provided to implement the mitigation. Therefore, these additional geometric changes cannot be implemented.

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~~**Mitigation Measure TRANS-23D**~~ **TRANS-23B:** As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.

Overall, implementation of Mitigation Measures TRANS-23A and 23-B would reduce impacts. However, the City lacks authority to independently implement TRANS-23A and the changes discussed above are infeasible. In addition, dDue to the severity of the congestion at this location, it is unlikely that a TDM Plan could reduce this impact to a less-than-significant level. Therefore, impacts remain significant and unavoidable.

**Significance after Mitigation: Significant and Unavoidable**

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23) Starting on Draft EIR page 4.14-74, the following text is clarified per response to comment 10-3:

**Impact TRANS-25: The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the PM peak hour for intersection #3 Bair Island Road / East Bayshore Road (Criteria a and b). (Significant)**

The worsening traffic operations at this location are due to the increase in outbound traffic destined for the northbound US 101 on-ramp from the Project site. ~~A possible mitigation measure could be the **Mitigation Measure TRANS-25A:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construction of intersection geometry improvements at Bair Island Road / East Bayshore Road. The geometry improvements ~~could~~ are widening the roundabout to two circulation lanes, and changing the westbound approach to one through lane and a 100-foot right turn pocket. In addition, the southbound approach ~~could~~ would be widened into two lanes, one left-turn and one right-turn lane.~~

~~These physical improvements to the intersection geometry would improve operations of this intersection to LOS E during the PM peak hour (with less vehicle delay than Cumulative No Project conditions). However, significant intersection expansion such as those achieved by the physical improvement described above, conflicts with City plans and goals related to multimodal access and safety. The intersection expansion would cause secondary impacts to pedestrian and bicycle safety. Further, this mitigation measure these physical improvement may be infeasible due to right-of-way constraints. Therefore, this mitigation measure cannot be implemented.~~

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~~However, the~~The following mitigation measure would ~~be required to~~ address the traffic operations at this location:

**Mitigation Measure TRANS-25BTRANS-25:** ~~As a secondary mitigation measure, the~~The Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.

Due to the severity of the congestion at this location, it is unlikely that a TDM Plan could reduce this impact to a less-than-significant level.

**Significance after Mitigation:** Significant and Unavoidable

24) Starting on Draft EIR page 4.14-74 is modified as follows in response to comment 10-3:

Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects.

**Mitigation Measure TRANS-26:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall contribute its fair share contribution to implement geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet to 250 feet or to the satisfaction of the City; and to ~~In addition, the applicant shall make~~ signal improvements to optimize overall cycle length and adjust green split timing. ~~Green time shall be added to the eastbound left turn movement (phase 1), westbound left turn movement (phase 5), and northbound and southbound through movements (phase 4), while overall cycle length shall extend from 116 second to 160 seconds. Project applicant shall also coordinate with the City to ensure that signal timing changes do not negatively affect adjacent coordinated signals along Veterans Boulevard.~~

**Significance after Mitigation:** Significant and Unavoidable

25) Draft EIR page 4.14-88: Table 4.14-24 is corrected in response to comment 10-6 and updated to address the Revised Project:

**DEIR TABLE 4.14-24 (MODIFIED)  
TRIP GENERATION WITH TDM PLAN**

Land Use	AM Peak Hour Trips	PM Peak Hour Trips
<b>Draft EIR Project</b>		
Project Trip Generation (from Table 4.14-7)	<del>1,345</del> <u>1,254</u>	<del>1,282</del> <u>1,364</u>
TDM Vehicle Trip Reduction (11%)	<del>148</del> <u>183</u>	<del>141</del> <u>185</u>
<b>Total Vehicle Trips with TDM Plan</b>	<b><u>1,106</u></b> <del>1,162</del>	<b><u>1,141</u></b> <del>1,176</del>
<b>Revised Project</b>		
Project Trip Generation	1,010	826
TDM Vehicle Trip Reduction (20.7%)	<u>210</u>	<u>171</u>
<b>Total Vehicle Trips with TDM Plan</b>	<b>800</b>	<b>655</b>

SOURCE: Fehr & Peers, 2018; 2022.

26) Draft EIR page 5-2 is updated by staff to include inadvertently omitted text:

### 5.2.3 Significant and Unavoidable Impacts

As stated in factor #2 in section 5.2, *Factors Considered in the Alternatives Analysis*, the selection of alternatives shall consider the ability of each alternative to avoid or lessen the significant environmental impacts of the project. The significant impacts of the proposed Project are listed below, as they were identified throughout the analysis in Chapter 4.

#### **Consistency with Clean Air Plan - Cumulative**

- Impact AIR-1.CU: Development of the Project, combined with cumulative development citywide, would result in cumulative air quality impacts.

#### ***Intersection Operations – Existing Plus Project (No Blomquist Extension)***

- **Impact TRANS-1:** The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially.
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# CHAPTER 5

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## Master Responses

### 5.1 Introduction

This section presents responses to environmental issues raised in multiple comments presented in Chapter 6, *Individual Comments and Responses*, or Chapter 7, *Public Hearing Comments and Responses*, of this document. Rather than responding to each of these recurring comments individually, wherever they occur in Chapter 6 or Chapter 7, Master Responses address like comments collectively in this chapter. Master Responses are organized by environmental theme (addressing multiple, closely-related issues) or topic. Where individual comments that are addressed by a Master Response occur in Chapters 6 or 7, it is cross-referenced to this chapter and the applicable Master Response.

### 5.2 Master Responses

#### Master Response 1: Project Employment Density and Effects on Project Impacts

*Numerous comments assert that the Draft EIR used an improper employee density factor for the analysis of service-related topics for office development at the site.*

##### 5.2.1 Employment Density

###### **Variables**

The likely number of employees present at a location can be best characterized by employee density, which is commonly expressed in terms of the average amount of building floor area per employee. Thus, for an employee density of 250 square feet per employee, dividing the total building area by 250 provides the number of employees that would be present on the site at that density. For the Draft EIR Project, the overall service population of the Office portion of the Draft EIR Project was determined to be 4,579 persons (1,144,748 total square feet divided by 250 square feet per employee). A lower floor area factor of 150 square feet per employee would result in more employees: 7,632 (1,144,748 total square feet divided by 150 square feet per employee). Conversely, a higher floor area factor of 350 square feet per employee would result in fewer persons: 3,270 persons (1,144,748 total square feet divided by 350 square feet per employee).

### **Factoring Net and Gross Building Areas**

Also relevant to employee density is the distinction between *net* and *gross* building area per employee. Net building area is a building's net rentable area, which excludes lobbies, storage areas, mechanical spaces, etc. Gross building area is the entire building. Using net (less) building area calculates to a higher apparent employee density, whereas using gross (more) building area calculates to a lower apparent employee density. It is not known if the employee densities mentioned by the various Draft EIR commenters are based on net or gross building areas.

Many studies and available information concerning office building occupancy appear to use both net and gross measurements without distinction. For instance, a recent article by Cushman & Wakefield, one of the largest commercial real estate brokers in the world, surveyed office occupancy and employment densities in over 50 markets across the United States.<sup>1</sup> The 2018 article introduced the discussion by stating that “the trend of more employees in less space is slowing.” Between 2009 and 2013, the article stated, square footage per employee shrunk 5.8 percent, which is an average of 1.4 percent per year. Since 2013, the annual average rate of densification has been less than half that pace (0.6 percent per year). The survey found that the national average of office space per employee is 194 square feet per employee, and in Silicon Valley the average is 191 square feet per employee. However, direct communication with the author of the study confirmed that the figures used in the City's assessment represented *net* employee density, not *gross* employee density.<sup>2</sup> Considering that up to 30 percent of a typical office building is non-rentable space (lobbies, mechanical spaces, elevator shafts, building operation and administration areas, etc.) excluded from a building's gross floor area, a figure of 191 *net* square feet per employee could reasonably be interpolated to 250 *gross* square feet per employee.<sup>3</sup>

### **Draft EIR Employment Density Assumptions**

The Draft EIR analysis assumed an average employment density of 250 gross square feet per employee for Office uses, which is supported by the substantial evidence presented above. In further support of the Cushman & Wakefield survey findings cited above, Redwood City conducted a comprehensive transportation assessment in 2018 that considered local employment densities.<sup>4</sup> As part of that assessment, a series of large office complexes were surveyed and evaluated. The results of that survey are summarized in **Table 5-1** below.

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<sup>1</sup> Cushman & Wakefield. 2018. Space Matters – Occupancy Report. Published May 9, 2018. Available at: <http://blog.cushwake.com/americas/why-space-matters-density.html>. Accessed August 16, 2019.

<sup>2</sup> Smith, David C., Vice President, Americas Head of Occupier Research, Cushman & Wakefield. Email communication, August 12, 2019.

<sup>3</sup> 1,144,748 gross square feet (gsf) is approximately 801,324 net square feet (nsf). Applying a 191-nsf per employee density factor results in 4,195 employees. Comparatively, applying a 250 gsf density results in 4,579 employees.

<sup>4</sup> City of Redwood City. 2018. Redwood City Moves; A Comprehensive Assessment of Transportation Within Redwood City. July, 2018. Available at <https://rwcmoves.com/final-plan>. Accessed August 16, 2019.

**TABLE 5-1  
REDWOOD CITY SURVEYED OFFICE SITE CHARACTERISTICS**

Office Type	Location	Size	Date Surveyed	Employee Density (gross square feet per employee)
Suburban Office	Redwood Shores	660,000 square feet 1,500 employees	April and May, 2017	440 square feet per employee
Suburban Office	Pacific Shores	912,000 square feet 3,039 employees	December, 2107	300 square feet per employee
Downtown Office	Downtown Redwood City	295,000 square feet 1,100 employees	April, 2017	268 square feet per employee
Downtown Office	Downtown Redwood City	55,000 square feet 87 employees	December, 2017	632 square feet per employee

SOURCE: Adapted from Table A-3, Redwood City Moves, 2018, Appendix A.

As shown in Table 5-1, the Draft EIR's application of 250 square feet per employee for Office uses is a conservative estimate when measured alongside comparable office complexes in Redwood City. If anything, the Draft EIR's analysis may have overestimated the likely number of employees associated with the Project. The assertion by several commenters that the Draft EIR used an improper employment density for its analysis of service-related topics (population and housing, public services, utilities, etc.) is not supported.

Several commenters point to other office campuses in the region, such as Facebook, Apple, Google, and others. Office uses at many of those campuses do, in fact, operate at higher densities than assumed for the proposed Project, though many of the higher density campuses referred to by the commenters may be measured using *net* square footage per employee rather than *gross* square footage per employee, which would result in densities that appear to be much greater. Regardless, single-user campuses like Facebook, Google, etc. are substantially different from the proposed Project, in that they were designed specifically to serve a single identified tenant, and were developed around defined operational cultures where a higher density is feasible and even desirable. This will not necessarily be the case with the proposed Project, since the Project is designed to serve multiple tenants, all of whom will have different requirements and desires for their operations. Some tenants may seek a high density operation, whereas others may seek a lower density operation. The higher density operations referred to by the commenters are not typical of Office uses in the region, and any speculation that they are comparable to the proposed Project is not supported.

## **5.2.2 Employee Population and Air Quality, Greenhouse Gas Emissions, Noise, and Transportation Analyses**

A number of commenters noted an apparent discrepancy in the Draft EIR population assumptions that were used in the air quality, noise, and transportation sections of the Draft EIR. As with most EIRs, the analysis contained in the air quality, noise, and greenhouse gas (GHG) emissions analyses utilize data that is generated from the traffic analysis, which is therefore discussed below.



## ***Trip Generation and Employee Density***

### **Methodology Used in the Draft EIR**

For development projects such as the proposed Project, trip generation is typically derived from rates found in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*. ITE regularly updates rates in the manual based on nationwide surveys of a wide variety of land uses. Rates used to calculate the project's trip generation for office uses in the Draft EIR are based on General Office land use (ITE LU code 710) rates published in the 9<sup>th</sup> edition of the manual (2012). Trip generation rates based on the overall square footage of the Project were selected. It is standard industry practice to use ITE rates based on square footage for project-level analysis and environmental documentation.

Additionally, in the Draft EIR analysis, *MXD+* reductions were applied to the trip generation to account for built environment factors such as density and diversity of land uses, design of the pedestrian and bicycle environment, demographics of the site, and distance to transit.<sup>5</sup> These reductions represented approximately a six to seven percent reduction to peak hour trips compared to raw ITE estimates. Based on the overall square footage underlying the ITE and *MXD+* reduction equates to approximately 333 square feet per employee.

### **Alternative Methodology Used for Comparative Purposes**

In addition to considering local employment densities, the City's 2018 RWCMoves assessment also compiled empirical trip generation data at office complexes throughout the Redwood City.<sup>6</sup> For this Master Response, Fehr & Peers presents trip generation forecasts for various project scenarios using the alternative RWCMoves trip generation rates for Office use in suburban Redwood City based on number of employees.

The square footage per employee at surveyed sites in Redwood City range from approximately 268 to 632 (see Table 5-1), which supports the 333 square feet per employee assumed in the Draft EIR traffic study. However, to provide a conservative comparison for informational purposes, the trip generation for the Draft EIR Project, the Applicant's Revised Project (see Chapter 2 of this document), and the selected CEQA alternatives (Chapter 5 of the Draft EIR) has been recalculated using the 250 square feet per employee assumption for Office uses. This trip generation summary is presented below in **Table 5-2**.

*Comparative Trip Generation.* As shown in Table 5-2, peak hour (AM and PM) trip generation for the Applicant's Revised Project (based on 250 square feet per employee for Office uses and local Redwood City trip generation rates) is lower than what was calculated for the Draft EIR Project (based on ITE square footage, which was used throughout the Draft EIR for peak hour intersection analysis, and ITE rates). Therefore, no additional impacts to transportation would be

<sup>5</sup> *MXD+* is a trip generation tool that was developed by Fehr & Peers in 2010 in collaboration with the U.S. Environmental Protection Agency (US EPA) that continues to be updated. *MXD+* has been peer reviewed and validated for the San Francisco Bay Area to be more accurate than ITE methodology alone. *MXD+* has been used for other recent EIRs in Redwood City and for many other projects in the Bay Area.

<sup>6</sup> City of Redwood City. 2018. Redwood City Moves; A Comprehensive Assessment of Transportation Within Redwood City. July, 2018. Available at <https://rwcmmoves.com/final-plan>. Accessed August 16, 2019.

expected of the Applicant's Revised Project beyond those that were previously disclosed in the Draft EIR. Total daily vehicle trips for the Revised Project are expected to be greater (by less than 10 percent) than what was calculated for the Draft EIR Project due to incorporation of local (not ITE) rates. The local rates reflect the adjustment to the density of employees noted above and the fact that Redwood City employees' travel patterns are more spread out over the course of the day than predicted through national ITE rates. However, total daily trips were not used to determine significance impacts related to peak hour intersection analysis but rather to determine impacts related to vehicle miles traveled (VMT), as explained further below.

Comparative Air Quality and GHG Emissions. Table 5-2 also compares for informational purpose the operational air quality emissions for the Draft EIR Project and the Applicant's Revised Project based on the 250 square feet per employee for Office uses. As shown in Table 5-2, air quality and GHG emissions would increase, largely as a function of the greater number of employees resulting with the 250 square feet per employee density. However, no new significant impacts would result, with the exception of annual service population GHG emissions for the Revised Project, which would exceed the 2030 GHG Emissions significance threshold (2.8) without project design features. With the provision of approximately 254 parking spaces with EV charging installed (10 percent of total spaces), there would be no new impact. (See related *Greenhouse Gas Emissions / Climate Change* evaluation of the Modified Project in Chapter 2 of this document.) Accordingly, no new impact is identified for this information-only assessment to inform commenters and reviewers of this EIR.

### **Vehicle Miles Traveled (VMT) Analysis of the Applicant's Revised Project**

VMT Background. The operations of transportation facilities have traditionally been described with the term *level of service* (LOS). LOS describes traffic flow from the driver's perspective based on factors such as speed, travel time, delay, and freedom to maneuver. California Senate Bill 743 (SB 743) was adopted in 2013 and directed the State of California's Office of Planning and Research (OPR) to look at different metrics for identifying transportation impacts and make corresponding revisions to the CEQA Guidelines. OPR issued revised CEQA Guidelines in December 2018 along with a *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) to assist practitioners in implementing the CEQA Guidelines to use vehicle miles traveled (VMT) instead of LOS as the new metric to evaluate transportation impacts.

When the Notice of Preparation (NOP) of the Draft EIR was issued on January 12, 2018, and when the Draft EIR was completed with issuance of a Notice of Completion (NOC) on January 16, 2019, Redwood City had not yet adopted a VMT threshold or significance criteria. Further, the statewide mandate was not in full effect until July 1, 2020. Therefore, VMT was not required to be included in the 2018/2019 Draft EIR; LOS was still used to determine impacts, and mitigation measures were identified to address those deficiencies. In addition, total VMT and VMT per employee were originally calculated for the Draft EIR Project for informational purposes only (page 4.14-31 of the Draft EIR). No impact was identified.

In July 2020, the City of Redwood City implemented SB 743 and adopted VMT thresholds as part of their Transportation Analysis Manual (TAM), which provides specific guidance for VMT

analysis and determination of significant impacts. Further, as documented in the court opinion *Citizens for Positive Growth & Preservation v. City of Sacramento* (43 Cal.App.5th 609 (2019)), the Third District Court of Appeals ruled that the provision of SB 743 stating that automobile delay is not a significant environmental impact began to apply when Guideline 15064.3 took effect. This ruling effectively required that projects prepare a CEQA-level VMT analysis as part of the EIR process.

Comparing the informational VMT per employee presented in the Draft EIR against the City's subsequently adopted threshold would result in a significant impact. Implementation of Mitigation Measure TRANS-3B (implementation of a TDM Plan) that was identified in the Draft EIR to address transportation impacts with ongoing monitoring would also mitigate the informational VMT impact to a less than significant level. (See Chapter 2 of this document for impact discussion and Table 5-2 below).

While LOS is no longer used to determine CEQA impacts, Redwood City and the San Mateo City/County Association of Governments (C/CAG) may still require LOS analysis for select intersections under their development approval processes. This analysis was previously done as part of Section 4.17, *Transportation and Traffic*, of the Draft EIR, and the Project Applicant will implement or provide their fair-share to the LOS-related measures identified therein, consistent with Redwood City policies (and modified in Chapter 4, *Revisions to the Draft EIR and Summary of Impacts, Mitigation Measures and Policies*, of this document), in addition to the VMT-related mitigation measure (Mitigation Measure TRANS-3B).

Revised Project VMT. VMT analysis for the Applicant's Revised Project is presented below in Table 5-2 (as also presented previously in Chapter 2 of this document for comparison with the Draft EIR Project VMT). Based on average trip length estimates obtained from the 2012 California Household Travel Survey (CHTS)<sup>7</sup> and regional travel forecasting models, and , conservatively applying the employee density of 250 square feet per employee discussed in prior sections of this Master Response, the estimated weekday daily VMT per employee is 31.3. While higher than what was presented for the Draft EIR Project in the Draft EIR (25.9, see the comparative impact discussion in Chapter 2 and Table 5-2 below), the estimated VMT per employee for the Revised Project compares to the San Mateo County average of 27.1 and the Bay Area regional average of 22.7. Also, Table 5-2 shows that the Revised Project would generate an estimated weekday daily VMT of 95,889 based on the modified employee estimate and trip lengths, and similarly more than what was presented for the Draft EIR Project in the Draft EIR (88,900, see the comparative impact discussion in Chapter 2 and Table 5-2 below).

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<sup>7</sup> California Department of Transportation. 2013. *2010-2012 California Household Travel Survey Final Report*. June 2013.

**TABLE 5-2  
DRAFT EIR PROJECT, REVISED PROJECT, AND ALTERNATIVES COMPARISON  
(For Informational Purposes, Based on Lower Office Employment Density and Local Redwood City Trip Generation Rates)**

	Draft EIR Project	Revised Project	No Project – Existing General Plan: Light Industrial / Building Materials Use	No Project – Existing Zoning: 70/30 R&D Lab + Ancillary R&D Office	No Project – Existing Zoning: 50/50 R&D Lab + Ancillary R&D Office	Reduced Buildout and Building Height	70/30 Office + Ancillary R&D Lab	Alternative Site Location	Onsite Public Amenities
Office (sf)	1,144,748	765,150	-	-	-	765,150	801,323	+/- 1,144,748	855,829
Amenities Building (sf) <sup>a</sup>	35,000	35,000	-	-	-	23,000	35,000	+/- 35,000	26,000
Low-Intensity Industrial / Building Materials (sf)	-	-	884,704	-	-	-	-	-	-
R&D Laboratory (sf)	-	-	-	578,076	412,911	-	343,425	-	-
R&D Office (sf)	-	-	-	247,747	412,911	-	-	-	-
Soccer Field Onsite (acres) <sup>b</sup>	-	-	-	-	-	-	-	-	+/- 4 acres
Ancillary Child Care (sf) <sup>c</sup>	-	-	-	-	-	-	-	-	+/- 15,000
Total Square Footage (sf)	1,179,748	800,150	884,704	825,823	825,823	788,150	1,179,748	+/- 1,179,748	881,829
# of Primary Buildings / Parking Structures	4 / 2	3 / 1	1 / 0	2 / 1	2 / 1	4 / 2	same	same	3 / 2
Total Site Acreage	27.08	27.08	27.08	27.08	27.08	27.08	27.08	+/- 27.08	27.08
<b>Comparative Service Population</b>									
Service Population applied in Draft EIR: Air Quality and Traffic Only <sup>d</sup>	3,434	-	-	-	-	-	-	-	-
Revised Service Population	4,579 <sup>e</sup>	3,061	1,911	2,418	2,672	3,061	4,053	4,579	3,423
<b>Net Change from Draft EIR</b>	<b>+1,145 employees</b>		<b>No change</b>	<b>No change</b>	<b>-</b>	<b>No change</b>	<b>No change</b>	<b>No change</b>	<b>No change</b>
<b>Comparative Vehicle Trips</b>									
Peak Hour AM/PM (Daily) Trip Generation as Reported in Draft EIR <sup>d</sup>	1,254 AM / 1,282 PM (8,090 Daily)	-	783 AM / 830 PM (6,047 Daily)	761 AM / 716 PM (5,601 Daily)	-	908 AM / 881 PM (5,959 Daily)	1,245 AM / 1,231 PM (8,712 Daily)	Similar to Revised Project	1,025 AM / 1,078 PM (6,934 Daily)
Revised Peak Hour AM/PM (Daily) Trip Generation <sup>f</sup>	1,511 AM / 1,236 PM <sup>g</sup> (13,042 Daily) <sup>g</sup>	1,010 AM / 826 PM (8,717 Daily)	841 AM / 803 PM (5,771 Daily)	827 AM / 821 PM (5,725 Daily)	898 AM / 890 PM (6,201 Daily)	1,010 AM / 826 PM (8,717 Daily)	1,408 AM / 1,217 PM (11,604 Daily)	Similar to Revised Project	1,134 AM / 995 PM (10,035 Daily)
<b>Net Change from Draft EIR</b>	<b>+257 AM / -46 PM <sup>g</sup> (+4,952 Daily) <sup>g</sup></b>	<b>-</b>	<b>+58 AM / -27 PM (-276 Daily)</b>	<b>+66 AM / +105 PM (+124 Daily)</b>	<b>-</b>	<b>+102 AM / -55 PM (+2,758 Daily)</b>	<b>+163 AM / -14 PM (+2,892 Daily)</b>	<b>No change</b>	<b>+109 AM / -83 PM (+3,101 Daily)</b>
<b>Comparative Greenhouse Gas Emissions</b>									
GHG Emissions (MT CO <sub>2</sub> e total and per Service Population annually) as Reported in Draft EIR <sup>d</sup>	10,538 2.3	-	7,937 4.2	6,745 2.8	-	6,905 2.3	9,636 2.4	Similar to Proposed Project	7,438 2.2
Revised GHG Emissions (MT CO <sub>2</sub> e total and per Service Population annually) <sup>f</sup>	21,712 <sup>g, h</sup> 4.5 <sup>g</sup>	8,540 <sup>g, h, i</sup> 2.79 <sup>i</sup>	-	-	-	-	-	Similar to Proposed Project	-
<b>Net Change from Draft EIR</b>	<b>+11,173 <sup>g</sup> +2.2 <sup>g</sup></b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>No change</b>	<b>-</b>

CONTINUED ON FOLLOWING PAGE

**(CONTINUED) TABLE 5-2  
DRAFT EIR PROJECT, REVISED PROJECT, AND ALTERNATIVES COMPARISON  
(For Informational Purposes, Based on Lower Office Employment Density and Local Redwood City Trip Generation Rates)**

	Draft EIR Project	Revised Project	No Project – Existing General Plan: Light Industrial / Building Materials Use	No Project – Existing Zoning: 70/30 R&D Lab + Ancillary R&D Office	No Project – Existing Zoning: 50/50 R&D Lab + Ancillary R&D Office Alternative	Reduced Buildout and Building Height	70/30 Office + Ancillary R&D Lab	Alternative Site Location	Onsite Public Amenities
<b>Comparative Air Quality Emissions</b>									
Operational Emissions as Reported in Draft EIR <sup>d</sup>	ROG 38.37 NOx 32.05 PM <sub>10</sub> 31.40 PM <sub>2.5</sub> 8.95	-	-	-	-	-	-	Similar to Proposed Project	-
Revised Operational Emissions <sup>f</sup>	ROG 81.57 <sup>g</sup> NOx 64.48 <sup>g</sup> PM <sub>10</sub> 107.17 <sup>g</sup> PM <sub>2.5</sub> 29.56 <sup>g</sup>	ROG 50.03 NOx 31.76 PM <sub>10</sub> 71.03 PM <sub>2.5</sub> 19.46	-	-	-	-	-	Similar to Proposed Project	-
<b>Net Change</b>	<b>ROG + 43.2 <sup>g</sup></b> <b>NOx +32.43 <sup>g</sup></b> <b>PM<sub>10</sub> +75.77 <sup>g</sup></b> <b>PM<sub>2.5</sub> + 20.61 <sup>g</sup></b>	-	-	-	-	-	-	<b>No change</b>	-
<b>Vehicle Miles Traveled (VMT)</b>									
Daily Vehicle Trips	8,090	8,717	5,771	5,725	6,201	8,717	11,604	Similar to Revised Project	10,035
Total Daily VMT Generated	88,900 <sup>g</sup>	95,889	-	-	-	-	-	-	-
Employee Estimate	3,434	3,061	1,911	2,418	2,672	3,061	4,053	4,579	3,423
VMT Per Employee	25.9 <sup>g</sup>	31.3	-	-	-	-	-	-	-

A – Amenities building does not generate vehicle trips separate from that of the office use.

B – Parking assumed on-street and in the proposed project’s parking lot during evening/weekend hours. No permanent field lighting or user amenities (e.g., bleachers, bathrooms) are assumed.

C – Located within amenities building and for Project employee use only.

D – Draft EIR used ITE rates based on overall square footage to calculate trip generations for all uses, which was incorporated into the Air Quality and Traffic Analyses. Employment density equated to approximately 333 square feet per employee.

E – Revised service population applies employment density of 250 square-feet per employee for Office land use.

F – Revised trip generation calculations are based on employee densities. Office land use assumes an adjusted higher-density 250 square-feet per employee and roughly equivalent local RWC Moves trip rates. Unchanged from the Draft EIR, R&D Laboratory assumes 405 square feet per employee, and R&D Office assumes 250 square feet per employee. Trip generation for all other uses use ITE rates based on employee densities. There are an additional 25 employees associated with the community building.

G – Presented for comparative informational purposes only.

H – Adjusted for 2019 Title 24 Standards, resulting in approximately 10 percent reduction of Energy Source emissions.

I – Accounts for reductions from required compliance with the City’s Reach Codes, carbon-free electricity supplied to the Revised Project from Peninsula Clean Energy and a 20.7 percent reduction in VMT, the minimal amount that would be achieved from the Project’s Site TDM Plan (2022) (Appendix B to this document).

## Master Response 2: Sea Level Rise

*Multiple comments were received concerning sea level rise at the Project site, and the effect the Project would have on future flooding.*

Global sea level rise is expected to increase the severity of flooding in existing coastal flood hazard areas and to expand the areas that will be exposed to coastal flooding in the future. The California Supreme Court has determined that CEQA does not *generally* require lead agencies to consider how environmental hazards such as flooding might impact a project's users or residents, except where the project would exacerbate an existing environmental hazard.<sup>8</sup> Accordingly, hazards resulting from a project that places development in an existing or future flood hazard area are not considered impacts under CEQA unless the project would exacerbate the flood hazard. A project could exacerbate existing or future coastal flood hazards if *the project* would increase the frequency or severity of flooding or cause flooding in an area that would not be subject to flooding without the project.

Impacts related to sea level rise are addressed in Draft EIR Section 4.8, *Hydrology and Water Quality*. The discussion provided under the heading "Sea Level Rise," (page 4.8-5) summarizes the best science currently available on sea level rise affecting the San Francisco Bay for both CEQA and planning purposes. The most current science includes the Ocean Protection Council's *State of California Sea-Level Rise Guidance: 2018 Update*, which is referenced by the County of San Mateo in Comment 5-6, corroborating the validity of this reference document. Sea level rise projections developed by the Ocean Protection Council in cooperation with the California Natural Resources Agency estimates that based on the 67 percent probability range for 2100, sea levels could rise by between 1.0 and 3.4 feet. Under Section 4.8.2 of the Draft EIR, *Regulatory Setting* (page 4.8-10), the Draft EIR further addresses local policies, which call for the consideration of global warming related impacts, including sea level rise and floodplain areas. As discussed in the Draft EIR's *Project Description* (page 3-27), and under Impact HYD-6 (page 4.8-17 to -18), the proposed Project would include raising the finished first floor level by four feet (to address three feet of sea level rise, plus one foot above the identified 10 feet NAVD 88 Base Flood Elevation, which considers storm surge). The minimum first floor elevation would be 14 feet NAVD 88, which is above the projected 67 percent probability future flood levels (for 2100) estimated by the Ocean Protection Council.

Therefore, contrary to the assertions of several commenters, the EIR does not ignore the potential effects of sea level rise and storm surge. The EIR considers the best and most current science available and determined that the Project would not exacerbate future flood hazards related to sea level rise and that the Project would be designed to be resilient to sea level rise that could occur by 2100. As concluded in Impact HYD-6 (page 4.8-17 and -18 of the Draft EIR), the Project's impacts related to future flooding would be less than significant in accordance with CEQA because none of the Project features would change bay circulation patterns, the configuration of

<sup>8</sup> The California Supreme Court's *CBIA v. BAAQMD* decision (*California Building Industry Association v. Bay Area Air Quality Management District*, (2015) 62 Cal. 4th 369) indicated that the impact of existing environmental conditions on a project's future users or residents are generally not required to be considered in a CEQA evaluation, except for certain statutory issues or when the project may exacerbate existing hazards or existing conditions.

the shoreline, or stormwater discharges in a way that would substantially change future flood flow patterns, or increase the potential for coastal erosion at the Project site or in the vicinity.

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## Master Response 3: Population Growth and Jobs/Housing Balance

*Numerous comments were received concerning the jobs/housing balance in the City and the larger region and the effect the Project would have on employment and housing.*

### ***Jobs/Housing Balance and Future-Employee Choice***

The EIR provides information on the topic of jobs-housing balance in EIR Section 4.11, *Population Housing, and Employment* on pages 4.11-4, 4.11-6, 4.11-10, and 4.11-11. As stated on page 4.11-6 of the EIR, “[jobs/housing balance] is a planning tool with which to weigh particular policy considerations on a regional scale, and not a regulatory tool for development proposals. Nor does jobs/housing balance necessarily imply a physical change to the environment or relate to any recognized criteria under CEQA.” Furthermore, jobs/housing balance does not fall within the purview of CEQA; there are no identified CEQA significance thresholds for jobs/housing balance. In addition, this topic is not static and is an inherently imprecise assessment given the numerous factors that contribute to individual housing selections. For example, given the uncertainty of where future employees will live, it is not possible to evaluate how new jobs will impact specific neighborhoods. To do so would be highly speculative. Thus, the information presented in this master response is offered for informational purposes only, as it was done in the Draft EIR.

As discussed below, the Revised Project addressed here would not increase the City’s existing job to housing ratio. When looking at anticipated jobs compared to anticipated housing growth, the jobs/housing balance remains stable. The Draft EIR presented that the new employees associated with the Draft EIR Project, combined with the 2020 projection of housing units citywide, would not change the City’s existing jobs/housing ratio of 2.1.

### ***Project Generated Housing Demand and Local Supply***

#### **Project Employment**

To consider the possible amount of housing demand the Draft EIR Project and, separately, the Revised Project could have on local housing, the Draft EIR makes a conservative assumption for the purposes of maintaining consistency with other topics (see Section 4.12 *Public Services*, page 4.12-10): 50 percent of the new employees (2,290 employees for the Draft EIR Project) would relocate to Redwood City.”<sup>9</sup> As addressed in the attachment to Comment Letter 10,<sup>10</sup> recent

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<sup>9</sup> Note that population considered in Section 4.12 *Public Services* is based on the total estimated service population of 4,579 employees, which assumed an employee density for Office uses of 1 employee per 250 square feet.

<sup>10</sup> See attachment to Letter 10: Sedway Consulting, March 7, 2019. Harbor View Project Draft Environmental Impact Report Response.

census data indicates the rate could be as low as 28 percent, so a 50 percent retention remains a conservative assumption. Using the same approach considered in the Draft EIR, the Revised Project, at 3,061 employees, would result in an estimated 1,531 new employees to Redwood City, which is fewer than estimated for the Draft EIR Project.

In addition, pages 4.11-7 and 4.11-8 of the Draft EIR explain that 1,728 employees could be generated on the Project site under current zoning designations.<sup>11</sup> Therefore, the Draft EIR jobs-housing population estimate was conservative by considering the *overall population growth* as opposed to the *net population growth* when comparing growth with the Draft EIR Project to development growth provided for under the existing zoning. Considering employment permitted under the existing zoning as the baseline (1,728 employees), then the Revised Project would generate an increase of 1,358 employees, which is less than considered in the Draft EIR Job/Housing Balance discussion.

### **Local Projected Housing Supply**

As addressed in the Draft EIR, the City and region currently anticipate additional growth in housing. As stated on page 4.11-11 of the EIR, “According to the City’s 2015-2023 Housing Element, the City has the potential to accommodate the construction of up to 3,333 new housing units at various affordability levels through 2023...” and “...ABAG projects a 34 percent increase in housing units for the City during the period 2018 to 2040, and a 23.3 percent increase Countywide (ABAG/MTC, 2017b).” Based on these projections, there will be increased housing within the City for potential Project employees. Furthermore, the EIR on page 4.11-10 describes that “while there is no requirement for non-residential projects to also develop housing onsite or offsite, the Project sponsor will pay affordable housing in-lieu fees pursuant to the City’s existing Affordable Housing Ordinance. The Ordinance is intended to support the development of new housing for the City to meet its RHNA affordable housing obligation, and relative to the issue of jobs/housing balance, it supports the development of new off-site housing within the City (i.e., near the new Project workers and regional transit), and that contributes to a diverse range of housing affordability for workers who elect to live in Redwood City in 2020 when the proposed Project would begin operation.”<sup>12</sup> For these reasons, the Project would not create a substantial demand for housing that was not anticipated Citywide and regional development. In addition, the Project would assist in the creation of affordable housing that would be developed because of affordable housing in-lieu fee revenue.

### **Current and Future Jobs Housing Ratio**

To further substantiate the informational discussion in the EIR, and to address various commenters requesting clarification about the methodology used in considering housing demand

<sup>11</sup> Approximately 405 employees per square foot of low-rise light industrial/low-intensity industrial / building materials space (theoretically 884,810 sq.ft., as established in the No Project – General Plan Alternative in Chapter 5, *Alternatives*, of this Draft EIR) (USGBS, 2008).

<sup>12</sup> Additionally, as part of the community benefits package, which would be established in a Development Agreement (DA) between the City and the Project sponsor, the Project sponsor proposes a 50-unit apartment building that they would offer as a 100 percent affordable housing building.



from the Project, and cumulative housing availability, the following supplemental, informational, discussion is provided.

### Jobs per Household

Table 4.11-3 of the Draft EIR presented current and projected jobs and households for Redwood City and San Mateo County. In order to address the comments contained in the attachment to Comment Letter 10,<sup>13</sup> this table, on page 4.11-4 of the Draft EIR, is revised as follows in **Table 5-3** (also included in Chapter 4, *Revisions to the Draft EIR and Summary of Impacts, Mitigation Measures and Policies*):

**TABLE 5-3  
UPDATED DRAFT EIR TABLE 4.11-3  
ESTIMATED JOB TRENDS AND GROWTH FOR REDWOOD CITY AND SAN MATEO COUNTY –  
2010 TO 2040**

	2010	2018	2030	2040	Change, 2018-2040	Percent Change, 2018-2040
<b>Redwood City</b>						
Total jobs	58,080	68,240	73,330	77,480	9,240	13.5%
Total households	27,957	30,316	33,880	36,860	6,544	21.6%
Total jobs per household	<del>2.082-69</del>	<del>2.252-3</del>	2.16	<del>2.102-73</del>	0.43	18.6
Total employed residents	36,460	41,688	45,310	48,630	6,942	16.6
<b>San Mateo County</b>						
Total jobs	345,190	394,506	421,500	445,070	50,465	12.8%
Total households	257,837	273,810	296,280	315,100	41,290	15.1%
Total jobs per household	1.33	1.44	<del>1.422-79</del>	1.41	-0.03	-2.1%
Total employed residents	342,060	386,448	413,740	438,770	+52,332	13.5%

Year 2018 data interpolated from Years 2015 and 2020 ABAG Data

SOURCE: ABAG, 2013, *Projections 2013*

When considering this change and assuming all future jobs are held by local residents, the 2018 employment (jobs) to housing ratio is 2.25 jobs per household. Based on ABAG's 2013 projection, with employment and household growth through 2030, this rate is calculated to drop to 2.16 jobs per household. This drop represents a higher rate of household growth than employment growth. Thus, over time, the jobs to housing ratio will decrease. Page 4.11-11 of the EIR identified ABAG's projection for 2020 of 2.1 jobs to each housing unit, and that the Project's net increase on 2,290 jobs would not substantially alter this rate. With the Revised Project's lower employment generation, there would be a reduced number of employees, resulting in a reduced demand for housing than that considered for the Draft EIR Project in the Draft EIR.

<sup>13</sup> See attachment to Letter 10: Sedway Consulting, March 7, 2019. Harbor View Project Draft Environmental Impact Report Response.

### Supplemental Cumulative Housing Generation in the City

The Draft EIR considered cumulative growth as described in Section 4.0, *Environmental Setting*; pages 4-4 through 4-7 provide background information and a cumulative context projections list that reflects, past, present, and reasonably foreseeable cumulative projects within the Project vicinity. Please refer to Response to Comment 8-5 in Chapter 6 of this Final EIR for additional information regarding this cumulative context.

Section 4.11 of the Draft EIR, *Population Housing, and Employment*, considers the Project's impacts in the context of planned growth by the City under the Redwood City's 2010 General Plan, which has a planning horizon of 2030. Although Plan Bay Area considers development through 2040, the Project impacts are considered in light of the City's specific planning documents. Page 4.11-3 of the Draft EIR considers housing availability based on the Redwood City's 2015-2023 Housing Element, which was the adopted element when the Draft EIR was prepared. While this information facilitates the discussion of housing availability and affordability, in order to address comments related to the City's current status in meeting its forecast housing, information from Draft EIR Table 4.0-1, Table 4.11-3, and Table 4.11-5 has been consolidated into **Table 5-4** below to show current and forecast growth in Redwood City. Based on estimated buildout of the Redwood City 2010 General Plan, between 2018 and 2030, there remains an estimated capacity for 6,433 more households [36,749 households in 2030 minus (-) 30,316 households in 2018].

**TABLE 5-4**  
**REDWOOD CITY GENERAL PLAN AND CUMULATIVE HOUSING GROWTH 2018-2030 <sup>a</sup>**

	2018 ABAG Household Estimate <sup>b</sup>	Identified Cumulative Housing <sup>c</sup>	Total Near-Term Households	Anticipated Households under 2030 General Plan Buildout
Households	30,316	2,614	32,930	36,749

<sup>a</sup> Redwood City Limits

<sup>b</sup> Year 2018 data interpolated from Years 2015 and 2020 ABAG Data (ABAG, 2013)

<sup>c</sup> Provided by Draft EIR Table 4.0-1; housing units do not consider possible future vacancy rate.

SOURCE: ABAG, *Projections 2013*; and *Redwood City General Plan EIR*, 2010

By considering the Redwood City General Plan household buildout total of 36,749 units, and the 2,614 cumulatively identified household units currently under review, approved, or under construction (per Table 5-4 above), the City has an estimated 3,819 more units to develop by 2030 [36,749 projected General Plan households minus (-) the near-term total of 32,930 households] to meet the housing needs for the City. This demonstrates that the City has remaining capacity under its General Plan land use designation to provide for more housing.

Overall, the Draft EIR's methodology conservatively assessed the Project's employment and demand for housing, and considered the best available information for cumulative housing availability. The Revised Project, as addressed above, would generate a reduced demand on housing when compared to the Draft EIR Project.

## Master Response 4: Comments on the Project's Merits

*Many comments were received that expressed a commenter's support or opposition to the Project, or that presented the commenter's opinion on the desirability of the Project.*

As stated in the CEQA Statute, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." [CEQA Section 21002.1(a)]. Following public review of an EIR, lead agencies are directed to "evaluate comments on *environmental issues* [emphasis added] received from persons who reviewed the draft EIR and prepare a written response." [CEQA Guidelines Section 15088(a)]

Many of the comments that were received on the Draft EIR did not address specific environmental issues or effects associated with the Project. These comments also did not address the adequacy of the analysis contained in the Draft EIR. Ultimately, these comments asserted the opinions of the commenters as to how the Project should or should not be developed, and therefore do not present information on environmental issues. No additional analysis or response is required for these types of comments [*Twain Harte Homeowners Ass'n v. County of Tuolumne* (1982) 138 Cal.App.3d 664, 679]. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project and whether or not to approve it.

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# CHAPTER 6

## Individual Comments and Responses

This section presents the comment letters received on the Draft EIR during the public review period and the responses to each comment received. **Table 6-1** indicates the numerical designation for each comment letter, the author of the comment letter, and the date the City received each correspondence. Comment letters are grouped by those received from an agency, organization, or individual, but are otherwise presented in the order in which they were received.

Each comment letter received during the public comment period was bracketed to identify individual topics, and individual responses to those comments are provided. In situations where the comment issue(s) was identified in multiple letters, a “Master Response” was prepared to address the general concern, and the response to comment may refer the reader to one of the Master Responses provided in Chapter 5. If a subject matter of one letter overlaps that of another letter, the reader may be referred to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided. Unless otherwise noted, responses pertain to either the Draft EIR Project or the Revised Project, which may be referred to generally as the “Project.”

**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received
<b>Agencies</b>			
1	California Public Utilities Commission	Matt Cervantes, Utilities Engineer	March 8, 2019
2	California Department of Toxic Substances Control	Sagar Bhatt, Project Manager	March 8, 2019
3	Native American Heritage Commission	Gayle Totton, Associate Government Program Analyst	January 28, 2019
4	Port of Redwood City	Kristine Zortman, Executive Director	March 8, 2019
5	County of San Mateo Planning and Building Department	Joseph LaClair, Planning Services Manager	March 1, 2019
6	California Department of Transportation	Patricia Maurice, District Branch Chief	March 18, 2019
<b>Organizations</b>			
7	Graniterock	Pat Mapelli, Land Use Manager	March 8, 2019
8	Grassetti Environmental Consulting	Richard Grassetti, Principal	March 8, 2019

**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>
9	Jay Paul Company	Janette R. D'Elia, Chief Operating Officer	February 11, 2019
10	Jay Paul Company	Janette R. D'Elia, Chief Operating Officer	March 8, 2019
11	Lozeau Drury, representing Laborers International Union of North America	Michael R. Lozeau	March 8, 2019
12	Path Forward Environmental Engineering & Geology	Craig Pelletier, David A. Gruant, Principal Geologists	February 7, 2019
13	Pacific Gas & Electric	Plan Review Team	February 1, 2019
14	Seaport Industrial Association	Greg Greenway, Executive Director	March 8, 2019
15	Sequoia Audubon Society	Leslie Flint, Chair, Conservation Committee	February 8, 2019
16	Sierra Club, Loma Prieta Chapter	Gita Dev, Sustainable Land Use Committee	February 8, 2019
<b>Individuals</b>			
17		Elizabeth Adam	February 9, 2019
18		Ellen Alberstat	February 7, 2019
19		Mari Aldridge	February 11, 2019
20		Nabeel Al-Shamma	February 10, 2019
21		Carol Bartlett	February 8, 2019
22		Gail Barton	February 11, 2019
23		Gary Bea	February 9, 2019
24		Jeanne Benioff	February 10, 2019
25		Diane Bigler	February 10, 2019
26		Patricia Blevins	February 11, 2019
27		Barbara Bonilla	February 14, 2019
28		Helga Boyle	February 8, 2019
29		Michael Braude	February 10, 2019
30		Jordan Briskin	February 7, 2019
31		Laura Brown	February 12, 2019
32		Pascal Bruyere	February 7, 2019
33		Fred Butts	February 8, 2019
34		Lee Callister	February 10, 2019
35		Monty Cleeves	February 8, 2019
36		MaryAnn Clifford	February 7, 2019
37		Joe Cocoa	February 9, 2019
38		Patti Colevas	February 10, 2019
39		Courtney	February 7, 2019
40		Heather Cowans	February 10, 2019

**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>
41		David Crabbe	February 7, 2019
42		Judy Cronin	February 7, 2019
43		Carol Cross	February 7, 2019
44		Donna Czarnecki	February 9, 2019
45		Mali	February 7, 2019
46		Janet Davis	January 16, 2019
47		Keith DeBrine	February 8, 2019
48		John Delgado	February 10, 2019
49		Gita Dev	February 8, 2019
50		Loretta Dipboye	February 9, 2019
51		Kathleen Djordjevich	February 7, 2019
52		Joan Donovan	February 7, 2019
53		Lisane Drouin	February 7, 2019
54		Gladwyn D'Souza	February 7, 2019
55		Ken Dulaney	February 8, 2019
56		Elizabeth Duncan	February 7, 2019
57		Kaia Eakin	February 8, 2019
58		Karin Eckelmeyer	February 7, 2019
59		Howard Eisenberg	February 7, 2019
60		Veronica Escamez	February 8, 2019
61		Luci Evanston	February 7, 2019
62		Pauline Facciano	February 7, 2019
63		Kyla Farrell	February 7, 2019
64		Patricia Ferrando	February 9, 2019
65		Leslie Flint	February 9, 2019
66		Patricia Fuenzalida	February 8, 2019
67		Daniela Gasparini	February 11, 2019
68		Alec Gellrich	February 8, 2019
69		James Gernand	February 10, 2019
70		Diana Hall	February 8, 2019
71		Trish Hallenbeck	February 7, 2019
72		Cynthia Hanson	February 8, 2019
73		Linda Hayward	February 6, 2019
74		Diane Heditsian	February 8, 2019
75		Rita Hester	February 8, 2019
76		Lisa Hicks-Dumanske	February 10, 2019
77		Bill Hilton	February 7, 2019

**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>
78		Mary Lou Holding	February 8, 2019
79		Rachel Holt	February 11, 2019
80		Michael Holubar	January 20, 2019
81		Cheerie Howse	February 8, 2019
82		Carol Hubenthal	February 7, 2019
83		Hitesh Jadav	February 9, 2019
84		Brian Jaffe	February 11, 2019
85		Allyson Johnson	February 7, 2019
86		Mona Jones-Romansic	February 8, 2019
87		Marty Jordan	February 7, 2019
88		Darren Karopczyc	February 8, 2019
89		Judith Kirk	February 10, 2019
90		Kim Ko	February 7, 2019
91		Bill Korboholz	February 8, 2019
92		Mel Kronick	February 7, 2019
93		Wendie Lash	February 8, 2019
94		Mary Lasley	February 6, 2019
95		Jennifer LeBlanc	February 8, 2019
96		Kim Lemmer	February 7, 2019
97		Susan Lessin	February 6, 2019
98		Rose Linn	February 7, 2019
99		Thalia Lubin	February 8, 2019
100		Valerie Lui	February 8, 2019
101		Susan MacDonald	February 9, 2019
102		Chris MacIntosh	February 7, 2019
103		Khorshed Madan	February 7, 2019
104		Patricia Mahoney	February 8, 2019
105		Tim Makovkin	February 7, 2019
106		Kent Manske	February 11, 2019
107		Pat Marriott	February 8, 2019
108		Shannon McEntee	February 8, 2019
109		Zeak Mead	February 8, 2019
110		Debbie Mendelson	February 10, 2019
111		Bill Michel	February 7, 2019
112		Martha Moga	February 7, 2019
113		Robin Montoya	February 7, 2019
114		Beverly Morgan	February 7, 2019

**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>
115		Patricia Murphy-Kracht	February 8, 2019
116		Christine Nagel	February 8, 2019
117		Sandra Nyholm	February 7, 2019
118		Kit O'Doherty	February 7, 2019
119		Julie Pardini	February 11, 2019
120		Carol Park	February 11, 2019
121		Collin Park	February 10, 2019
122		Susan Pellizzer	February 8, 2019
123		Lonny Pini	February 8, 2019
124		Diana Post	February 8, 2019
125		Thomas Pressburger	February 9, 2019
126		Audrey Quintero	February 7, 2019
127		Sonia Rackelmann	February 8, 2019
128		Rachel Rasmussen	February 8, 2019
129		William Risseeuw	February 5, 2019
130		Merrily Robinson	February 7, 2019
131		Aviva Rochester	February 9, 2019
132		Marc Roddin	January 19, 2019
133		Sandy Roos	February 7, 2019
134		Cindy Rosinski	February 8, 2019
135		Jon Rusteen	February 9, 2019
136		Steve Rutledge	February 7, 2019
137		Jeff Schlocker	February 7, 2019
138		Kathy Segura	February 8, 2019
139		Matthew Self	February 11, 2019
140		Eric Set	February 7, 2019
141		Donna Silverberg	February 7, 2019
142		Virginia Smedberg	February 11, 2019
143		Christy Smith	February 7, 2019
144		Jeremy Smith	February 11, 2019
145		Oscar Smith	February 8, 2019
146		Rebecca Smith	February 7, 2019
147		Joan Smithline	February 10, 2019
148		Jennifer Sneddon	February 8, 2019
149		Scott Sneddon	February 8, 2019
150		Nadia Sperling	February 8, 2019
151		Sherry Stack	February 7, 2019



**TABLE 6-1  
COMMENT LETTERS RECEIVED ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Letter #</b>	<b>Entity</b>	<b>Author(s) of Comment Letter/e-mail</b>	<b>Date Received</b>
152		Georgianna Stephen	February 10, 2019
153		Bruce Storms	March 7, 2019
154		Bruce Storms	February 9, 2019
155		Christopher Sturken	February 11, 2019
156		Allison Taborek	February 8, 2019
157		Carol Taras	February 8, 2019
158		Annie Tate	February 7, 2019
159		Francine Taylor	February 10, 2019
160		Taylor	February 11, 2019
161		Jeanie Treichel	February 10, 2019
162		Terry Trumbull	February 7, 2019
163		Ron Vane	March 4, 2019
164		Sandra Wallace	February 7, 2019
165		Janet Walworth	February 7, 2019
166		Dawn Ward	February 7, 2019
167		Ann Willard	February 7, 2019

## PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500  
LOS ANGELES, CA 90013



March 8, 2019

Steven Turner  
City of Redwood City, Planning Manager  
1017 Middlefield Road  
P.O. Box 391  
Redwood City, CA 94063

Sent by email to: [sturner@redwoodcity.org](mailto:sturner@redwoodcity.org)

**Re: Harbor View Project  
SCH 2018012016 — Draft Environmental Impact Report**

Dear Mr. Turner:

The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Draft Environmental Impact Report (DEIR)* for the proposed Harbor View Project (Project). City of Redwood City (City) is the lead agency.

The City proposes to construct a high tech office campus with four 7-story office buildings, one 4-story and one 6-story parking structures, and one 2-story employee amenities building. The office campus is centered with an approximately four-acre green space, and 10% of the site is reserved for public access. The Project applicant proposes to implement a Transportation Demand Management Program to reduce vehicle trips. The Project site is bordered by Blomquist Street to the north, the Union Pacific Railroad (UPRR) mainline tracks and Seaport Boulevard to the east, Highway 101 to the south, and the UPRR tracks spur tracks to the west.

The project is adjacent to four rail crossings of the UPRR Redwood Harbor Industrial Lead. Their crossing identifications and warning devices are as follows:

- Blomquist Street crossing, CPUC No. 001EA-27.86-C, DOT No. 753740J, equipped with two Commission Standard 8-A (flashing light signal assembly with additional flashing light signals over the roadway on a cantilevered arm) warning devices
- Blomquist Street crossing, CPUC No. 001EA-27.74-C, equipped with crossbucks
- Blomquist Street crossing, CPUC No. 001EA-27.29, DOT No. 754968M, equipped with traffic signals at the intersection
- Stein Am Rhein Court crossing, CPUC No. 001EA-27.29, DOT No. 754968M, equipped with one Commission Standard 8 (flashing light signal assembly) warning device

The Project site may be accessed along Blomquist Street or across the Stein Am Rhein Court cul-de-sac to the east.

RCEB staff met with representatives from UP, Caltrans, and the City to discuss improvements to crossings adjacent to the Project site. Modifications to the crossings were discussed, including addition of Commission Standard 9-A and Standard 8 warning devices to the crossings. The DEIR indicates that improvements are planned to Blomquist Street and Seaport Boulevard, including pedestrian and bicycle treatments, which were also discussed at the diagnostic meeting.

Steven Turner  
SCH 2018012016  
March 8, 2019

Any development adjacent to or near the railroad or light rail transit right-of-way (ROW) should be planned with the safety of the rail corridor in mind. New developments may increase pedestrian or vehicular traffic volumes not only on streets and at intersections, but also at nearby rail crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include the planning for grade separations or improvements to existing at-grade crossings. Examples of improvements may include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization. Pedestrian and bicycle routes should be designed to clearly prohibit and discourage unauthorized access (trespassing) onto the tracks, except at authorized crossings.

1-1

RCEB representatives are available to discuss any potential safety impacts or concerns at crossings. Please continue to keep RCEB informed of the project's development. More information can be found at: <http://www.cpuc.ca.gov/crossings>.

If you have any questions, please contact Willard Lam at (415) 703-1327, or [mci@cpuc.ca.gov](mailto:mci@cpuc.ca.gov).

Sincerely,



Matt Cervantes  
Utilities Engineer  
Rail Crossings Engineering Branch  
Safety and Enforcement Division

CC: State Clearinghouse, [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)  
Willard Lam, [wlm@cpuc.ca.gov](mailto:wlm@cpuc.ca.gov)

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**Letter 1**      **California Public Utilities Commission**  
**Response**     **March 8, 2019**

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1-1                      To the extent this comment addresses hazards related to Project site access and circulation, refer to Impact TRANS-16 in the Draft EIR, which discusses the Project's less-than-significant impact.

To the extent that the comment addresses railroad activity and pedestrian interactions, refer to Impact TRANS-19, which addressed pedestrian features, and the Project's less-than-significant impact. Existing City requirements would be implemented to provide safety measures for pedestrians crossing the active railroads to the east and west of the Project site (see Draft EIR page 4.14-58).

The City appreciates the Commission's interest in the Project, and will work with Commission staff to ensure that all appropriate regulations are followed and that all relevant Project components are designed in accordance with Commission recommendations and requirements. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR.

**From:** [Bhatt, Sagar@DTSC](mailto:Bhatt.Sagar@DTSC)  
**To:** [CD-Stephen Turner](mailto:CD-Stephen.Turner)  
**Subject:** Harbor View Draft EIR Comments  
**Date:** Friday, March 08, 2019 3:43:05 PM

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Hi Steven,

I just wanted to follow up about our phone call from February 26, 2019 regarding the draft EIR. Have you heard back from anyone in your attorney’s office, or from any of your CEQA folk about whether DTSC would be allowed to submit an addendum to the EIR on your behalf? Or whether the EIR would be revised to incorporate our project into it more clearly?

I also just wanted to submit these before the deadline, so that our more important questions can get answered:

DTSC has the following comments on the draft EIR for the Harbor View Property 320 – 350 Blomquist Street.

- Do the greenhouse gas emission calculations for the project include emissions from the Site cleanup? Section 4.6.5 “Impacts of the Project” indicates that the project will begin in June 2019. If the project will begin in June 2019, this would require DTSC to approve and finalize the Removal Action Workplan, and Site cleanup would need to be included in these emissions. Please either confirm that the emissions calculations account for this, or revise the document to reflect that activities related to cleanup under DTSC’s oversight are not included in this EIR as an impact. 2-1
- Mitigation Measure HAZ-2: A land use covenant will be recorded between the property owners and DTSC as part of the Site cleanup. Please clearly state whether the City plans to record an additional LUC as a condition of approval for the grading permit, or whether the draft EIR is referring to the LUC to be recorded with DTSC. 2-2
- Impact HAZ-2: DTSC believes that the conclusion of less than significant and no mitigation measures required is incorrect. DTSC believes that the correct conclusion would be potentially significant, with mitigation measures of implementing HAZ-1 and HAZ-2, and less than significant after mitigation. 2-3

Sincerely,

Sagar Bhatt  
Project Manager  
Site Mitigation and Restoration Program  
Cal/EPA Department of Toxic Substances Control  
[Sagar.Bhatt@dtsc.ca.gov](mailto:Sagar.Bhatt@dtsc.ca.gov)

(510) 540-3844

**Letter 2**      **Department of Toxic Substances Control**  
**Response**    **March 8, 2019**

2-1      The commenter asks if the calculation of greenhouse gas (GHG) emissions in the Draft EIR include any emissions that might be associated with cleanup of the project site. While Table 4.6-8 of the GHG analysis on page 4.6-22 of the Draft EIR estimates amortized construction-related GHG emissions of 150 metric tons per year, it only includes emissions associated with the use of off-road equipment, construction worker trips and the import of 115,000 cubic yards of clean materials and the export of building demolition material. Presently, the Removal Action Work plan (RAW) has yet to be prepared and there are no estimates of quantities of off-hauled hazardous materials. However, the construction schedule indicates that on-site asbestos would be addressed via onsite containment over a two-month period and not exported off-site. Containment activities for hazardous materials may consist of encapsulation with concrete, asphalt, building foundations, or fill placed thick enough to prevent vapor intrusion modest amount of additional off-road equipment use and concrete truck trips. Assuming a two-month period of two bulldozers and one backhoe operations, and conservatively assuming 100 additional concrete truck trips (the existing estimates of the Draft EIR assume concrete vendor trips for foundations), it is conservatively estimated using CalEEMod that on-site containment of hazardous materials would generate additional amortized construction emissions of 1.07 MT/year. Therefore, the amortized construction emissions shown in Table 4.6-8 of the Draft EIR are revised as indicated below. The addition of these emissions does not alter the service population emissions in the table and there would be no changes in the determination of significance with respect GHGs.

**DEIR TABLE 4.6-8 (MODIFIED)**  
**GHG EMISSIONS INVENTORY FOR THE DRAFT EIR PROJECT**

Emission Source	Total Emissions (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
Area Sources	0.09	<0.01	0.00	0.10
Energy Sources	4,086.11	0.31	0.08	4,118.33
Mobile Sources	5,570.95	0.20	0.00	5,576.01
Solid Waste	222.72	13.16	0.00	551.77
Water and Wastewater	114.57	0.13	0.08	142.29
<b>Total</b>	<b>9,994.43</b>	<b>13.81</b>	<b>0.16</b>	<b>10,388.50</b>
Amortized Construction Emissions over 30 Years				<u>150.87</u> 449.80
<b>Operation including Construction Total</b>				<u><b>10,539.37</b></u> <del>40,538.30</del>
Project level Significance Threshold				1,100
<b>Exceeds Significance Threshold?</b>				<b>Yes</b>
Service Population (4,579 employees)				4,579

Emission Source	Total Emissions (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> e
<b>Total Project GHG Emissions by Service Population</b>				<b>2.3</b>
Project level 2020 Significance Threshold				4.6
<b>Exceeds 2020 Significance Threshold?</b>				<b>No</b>
Project level 2030 Significance Threshold				2.8
<b>Exceeds 2030 Significance Threshold?</b>				<b>No</b>

NOTE: Columns may not total precisely due to rounding.

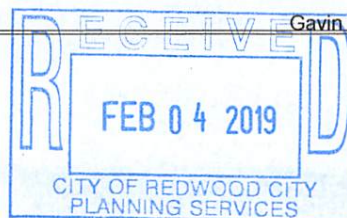
SOURCE: ESA, 2018 (Appendix C)

Conservatively applying the same construction assumptions to the smaller Revised Project analyzed in Chapter 2 of this Final EIR, and to the No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative discussed in Chapter 3 of this Final EIR and detailed in Appendix A, the additional amortized construction emissions of 1.07 MT/year would not change the service population emissions described in the GHG emissions analysis in those aforementioned chapters, and there would be no changes in the determination of significance with respect to GHGs. For the Revised Project in particular, the amortized construction emissions would increase from 147 MT/year to 148.07 MT/year, resulting in total emissions (construction + operations) of 8961.07 MT CO<sub>2</sub>e (compared to 8,960 MT CO<sub>2</sub>e). Factoring in the service population of 3,061 employees, the service population ratio remains 2.9 MT CO<sub>2</sub>e per service population – less than the significance thresholds.

- 2-2 To clarify Mitigation Measure HAZ-1b per the comment’s request, the land use covenant (LUC) referred to in Mitigation Measure HAZ-1b would be the LUC recorded with the DTSC. This clarification is made to Mitigation Measure HAZ-1b in Chapter 4 of this Final EIR, which lays out revisions to the Draft EIR.
- 2-3 With respect to the comment’s recommendation for the inclusion of mitigation measures to Impact HAZ-2, note that Mitigation Measures HAZ-1a and HAZ-1b discussed in Impact HAZ-1 are primarily focused on encountering hazardous materials caused by releases and spills to soil from previous uses of the property. As discussed in Impact HAZ-2, the presence and proposed removal of hazardous building materials in existing structures (asbestos-containing materials, lead-based paint, and PCBs in electrical transformers) is addressed through compliance with numerous existing regulations. Compliance with existing laws and regulations is required and the relevant regulatory agencies (e.g., the Bay Area Air Quality Management District) would continue to enforce laws and regulations. Finally, compliance with existing laws and regulations would be a condition of building permits. Therefore, with compliance with existing laws and regulations, no mitigations would be necessary and the impact would be less than significant.



STATE OF CALIFORNIA  
NATIVE AMERICAN HERITAGE COMMISSION  
Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710  
Email: [nahc@nahc.ca.gov](mailto:nahc@nahc.ca.gov)  
Website: <http://www.nahc.ca.gov>



Gavin Newsom, Governor



January 28, 2019

Steven Turner, Planning Manager  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

RE: SCH# 2018012016, Harbor View Project; City of Redwood City, San Mateo County

Dear Mr. Turner:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the above referenced project. The review included the Introduction and Project Description; the Executive Summary (Table 2-2); and the Environmental Setting, Impacts, and Mitigation Measures, section 4.4, Cultural and Tribal Cultural Resources prepared by Environmental Science Associates for the City of Redwood City. We have the following concern(s):

- 1. There is no documentation of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute. Contact letters appear to be from the consultant only. 3-1
- There are no mitigation measures specifically addressing Tribal Cultural Resources separately and distinctly from Archaeological Resources. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring. Mitigation language for archaeological resources is not always appropriate for measures specifically for handling Tribal Cultural Resources. Sample mitigation measures for Tribal Cultural Resources can be found in the CEQA guidelines at [http://opr.ca.gov/docs/Revised\\_AB\\_52\\_Technical\\_Advisory\\_March\\_2017.pdf](http://opr.ca.gov/docs/Revised_AB_52_Technical_Advisory_March_2017.pdf) or at <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf> 3-2

Agencies should be aware that AB 52 does not preclude them from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf), entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

If you have any questions, please contact me at my email address: [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

*Gayle Totton*  
Gayle Totton, B.S., M.A., Ph. D  
Associate Governmental Program Analyst

Attachment  
cc: State Clearinghouse

The California Environmental Quality Act (CEQA)<sup>1</sup>, specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.<sup>2</sup> If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.<sup>3</sup> In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).<sup>4</sup> **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for “tribal cultural resources”<sup>5</sup>, that now includes “a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.”<sup>6</sup> Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.<sup>7</sup> Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code §65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966<sup>8</sup> may also apply.

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

### **Pertinent Statutory Information:**

#### **Under AB 52:**

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

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.<sup>9</sup> **and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18).<sup>10</sup>

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects.<sup>11</sup>
1. The following topics are discretionary topics of consultation:
    - a. Type of environmental review necessary.
    - b. Significance of the tribal cultural resources.
    - c. Significance of the project’s impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.<sup>12</sup>

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.<sup>13</sup>

If a project may have a significant impact on a tribal cultural resource, **the lead agency’s environmental document shall discuss both of the following:**

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

<sup>1</sup> Pub. Resources Code § 21000 et seq.

<sup>2</sup> Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

<sup>3</sup> Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

<sup>4</sup> Government Code 65352.3

<sup>5</sup> Pub. Resources Code § 21074

<sup>6</sup> Pub. Resources Code § 21084.2

<sup>7</sup> Pub. Resources Code § 21084.3 (a)

<sup>8</sup> 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

<sup>9</sup> Pub. Resources Code § 21080.3.1, subds. (d) and (e)

<sup>10</sup> Pub. Resources Code § 21080.3.1 (b)

<sup>11</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>12</sup> Pub. Resources Code § 21080.3.2 (a)

<sup>13</sup> Pub. Resources Code § 21082.3 (c)(1)



- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.<sup>14</sup>

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.<sup>15</sup>

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.<sup>16</sup>

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code §21084.3 (b).<sup>17</sup> An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days.<sup>18</sup>

***This process should be documented in the Tribal Cultural Resources section of your environmental document.***

**Under SB 18:**

Government Code §65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of “preserving or mitigating impacts to places, features, and objects described §5097.9 and §5091.993 of the Public Resources Code that are located within the city or county’s jurisdiction. Government Code §65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Public Resources Code §5097.9 and §5097.993.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**<sup>19</sup>
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,<sup>20</sup> the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city’s or county’s jurisdiction.<sup>21</sup>
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
  - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.<sup>22</sup>

**NAHC Recommendations for Cultural Resources Assessments:**

- Contact the NAHC for:

<sup>14</sup> Pub. Resources Code § 21082.3 (b)  
<sup>15</sup> Pub. Resources Code § 21080.3.2 (b)  
<sup>16</sup> Pub. Resources Code § 21082.3 (a)  
<sup>17</sup> Pub. Resources Code § 21082.3 (e)  
<sup>18</sup> Pub. Resources Code § 21082.3 (d)  
<sup>19</sup> (Gov. Code § 65352.3 (a)(2)).  
<sup>20</sup> pursuant to Gov. Code section 65040.2,  
<sup>21</sup> (Gov. Code § 65352.3 (b)).  
<sup>22</sup> (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).



- A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - If part or the entire APE has been previously surveyed for cultural resources.
  - If any known cultural resources have been already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

**Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

- Avoidance and preservation of the resources in place, including, but not limited to:
  - Planning and construction to avoid the resources and protect the cultural and natural context.
  - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.<sup>23</sup>
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.<sup>24</sup>

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.<sup>25</sup> In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

<sup>23</sup> (Civ. Code § 815.3 (c)).

<sup>24</sup> (Pub. Resources Code § 5097.991).

<sup>25</sup> per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

**Letter 3      Native American Heritage Commission**  
**Response     January 28, 2019**

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- 3-1                      With respect to government-to-government consultation, as stated on page 4.4-6 of the Draft EIR, in 2015, ESA, as authorized and on behalf of the City, contacted the Native American Heritage Commission (NAHC) for a search of the Sacred Lands Inventory. The response of the NAHC was negative for the presence of sacred sites. Per Senate Bill 18 requirements, the City sent letters dated March 27, 2015, requesting additional information from locally knowledgeable Native Americans. For the Draft EIR, according to the requirements of Assembly Bill 52, on August 6, 2018, ESA again sent letters on the City's behalf to NAHC, which responded on that same date restating its negative finding for the presence of sacred sites, and provided a list of six Native American tribes who may have knowledge of resources in the Project area. ESA mailed letters of inquiry to each tribe on August 6, 2018. No responses were received. As such, the City has met its AB 52 consultation requirements. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.
- 3-2                      With respect to the EIR's discussion of tribal cultural resources, as stated above, and also on page 4.4-17 of the Draft EIR, the proposed Project development area contains no recorded tribal cultural resources. Although unlikely, the inadvertent discovery of these resources on the Project site during ground-disturbing construction cannot be entirely discounted. Disturbance of such resources and remains would be a potentially significant impact. However, the Project's potential to encounter previously unrecorded resources would be reduced to a less-than-significant level with implementation of Mitigation Measures CUL-2 and CUL-4, which provide for specific protocols to be followed if archaeological resources, tribal cultural resources, or human remains are inadvertently discovered during construction. This includes a preference for preservation in place according to the requirements of PRC Section 21084.3, which requires that public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. The mitigation measures also include a provision to consult with the appropriate Native American representative if prehistoric archaeological resources that could also be considered tribal cultural resources are identified. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.



# PORT OF REDWOOD CITY

*Serving Silicon Valley*

Port Commissioners  
Richard S. Claire  
Richard "Dick" Dodge  
R. Simms Duncan  
Ralph A. Garcia, Jr.  
Lorianna Kastrop

March 8, 2019

Mr. Steven Turner, Planning Manager  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

Re: HARBOR VIEW PROJECT, Draft Environmental Impact Report (EIR) - SCH No. 2018012016

Dear Mr. Turner,

Please allow this letter to serve as the Port of Redwood City's (Port) formal comment letter to the above referenced project. The project description of the Draft EIR states the following: *The project proponent requests a General Plan and Zoning Map Amendment to change the General Plan land use designation from Industrial-Light (LI) and Industrial-Port Related (IP) to Commercial Office Professional/Technology (CP) and change the Zoning Map district from Industrial Restricted (IR) and General Industrial (GI) to Commercial Park (CP).*

In October 2010, the City Council adopted the City of Redwood City's (City) General Plan, to serve as a planning document that would guide the City's growth and development through 2030. As such, the Port does not support the proposed General Plan or Zoning Map Amendment changes, as specified in the project description of the Draft EIR, to any other non-industrial use other than what was adopted by the City Council in 2010.

4-1

During the early planning stages of the General Plan initiative, the Port participated in meetings focused on land located east of the Highway 101/SR84 interchange, with the purpose of educating City staff, the public, and other stakeholders about the Port, its heavy industrial operations, and its benefits to the economic growth of the region. Several robust discussions included land-use compatibility as it relates to those lands that are either directly adjacent to the Port or land that may have indirect impacts from Port operations, including vehicular/truck traffic and compatibility. To that end, the Port supported the City's adopted General Plan's designation of "Industrial-Light" and "Industrial-Port Related" uses with the Zoning Map District of "Industrial Restricted" and "General Industrial". These types of uses do not pose potential conflicts for the Port or the industrial nature of the area.

A cornerstone of the Port is to serve as an economic engine to the region creating jobs, supplying raw construction materials via water versus truck, exporting of recyclable metals, serving the community and its first responders during natural disasters, and offering the citizens an active waterfront for personal recreational use. There are usual and customary business operations that occur with any industrial use, including truck trips, noise, and air quality that do not pose undo consequences to similar type industrial users and operators. A change in land use, to office as contemplated, places the office users in the same vehicular lanes of travel as heavy industrial trucks. Special consideration should be analyzed as it relates to mixed vehicular uses and conflicts, incompatible land uses, dust and noise mitigation, traffic queueing, and cumulative traffic emissions, including an increase to the trucks idling time while queued for ingress or egress to the freeway.

4-2

Additionally, the Port has recently engaged in a strategic vision process to grow cargo operations and revenue, diversify its real estate and trade portfolio, and maximize waterfront uses for both maritime industrial and recreational users. The goal of the vision is to serve as a framework for future growth thereby guiding the Port’s business development into the future, continuing our success as a working waterfront. As part of the vision, assumptions are being made based upon existing land use and zoning of the immediate area, in order to determine compatibility. Potential changes in land use and zoning could threaten the growth of the Port, its tenants, and the Port’s ability to serve the community with recreational waterfront amenities.

↑  
4-2  
cont.

With all this in mind, the Port cannot support the proposed land use and zoning changes from “Industrial-Light” and “Industrial-Port Related” and “Industrial Restricted” and “General Industrial”, respectively, to Commercial, Office, or other non-industrial use. Project by project zoning can defeat the intent of the General Plan and its zoning objectives, including land use compatibility.

4-3

The Port is committed to collaborating with the City as it grows the community into the future, however we desire to maintain what the City effectuated in 2010 with the General Plan adoption.

Sincere Regards,

Kristine A. Zortman  
Executive Director

cc: Board of Port Commissioners  
Ms. Melissa Stevenson Diaz, City Manager  
Ms. Lisa Costa Sanders

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**Letter 4**      **Port of Redwood City**  
**Response**     March 8, 2019

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- 4-1                    Refer to Master Response 4 in Chapter 5 of the Final EIR. This comment conveys the opinion of the commenter as to how the Project should be developed, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.
- 4-2                    The commenter is referred to the following sections of the Draft EIR, which analyzed each of the subjects listed in this comment: Section 4.2, *Air Quality*; Section 4.9, *Land Use and Planning*; Section 4.10, *Noise*; and Section 4.14. *Transportation and Traffic*. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.
- 4-3                    Refer to Master Response 4 in Chapter 5 of the Final EIR. This comment conveys the opinion of the commenter as to how the Project should be developed, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project



March 1, 2019

Lisa Costa Sanders  
City of Redwood City  
1017 Middlefield Road  
P.O. Box 391  
Redwood City, CA 94064

Dear Ms. Costa Sanders:

SUBJECT: Draft Environmental Impact Report for the Proposed Harbor View Project

San Mateo County appreciates the opportunity to comment on the Draft Environmental Impact Report for the Proposed Harbor View Project (DEIR). The proposed project appears to have components within the County's Fair Oaks Sewer District, west of Seaport Boulevard and south of Blomquist Avenue. The project site is approximately .4 miles from the unincorporated North Fair Oaks area, which will be affected by the traffic and increased housing demand generated by this project. The project involves construction of four office buildings and an employee services building all within the City of Redwood City. The following staff comments are based on our review of the DEIR.

**Regional Impacts**

Many of the project's impacts, particularly on transportation and housing, will be experienced within San Mateo County. The Environmental Impact Report (EIR) should discuss specific impacts that will be experienced within unincorporated communities of San Mateo County, such as North Fair Oaks, Emerald Lake Hills, Palomar Park and West Menlo Park, and the roadways upon which they rely. Moreover, methods for mitigating these impacts should be sufficiently detailed including strategies to offset housing impacts, and an explanation of how roadway and intersection improvements will be carried out to address congestion caused by the proposed project. This analysis should be cumulative, including the traffic and housing impacts of the nearby Stanford office complex and other ongoing and future projects in Redwood City and North Fair Oaks.

5-1

**Fair Oaks Sewer District Comments**

The Fair Oaks Sewer Maintenance District (Sewer District) has reviewed the project site plan and has the following comments.

- 1. The project proposes to construct an office building (B1) and parking structure (PSB) situated on parcels currently identified as Assessor Parcel Numbers (APNs) 052-392-280, 052-392-370, 052-392-480 and 052-392-570, which are within the boundaries of

5-2



the Sewer District. The Sewer District has several sanitary sewer mains on these properties as shown on the attached Sewer District Map. The Sewer District will not allow the proposed structures to be constructed over the existing Sewer District mains (see attached map).

2. If multiple parcels will be merged into one parcel, the issue of which agency is to provide sewer service to the new parcel must be addressed. Please note that the Sewer District only allows one sewer lateral connection at its sewer main, and that other existing lateral connections must be removed and the sewer mains repaired to the satisfaction of the Sewer District.
3. As an alternative, the four parcels identified above may be detached from the Sewer District. The result of such detachment will allow the City of Redwood City (City) to approve the project as proposed. Sewage treatment capacity for the entire project must be provided by the City. The Sewer District mains on these parcels will need to be abandoned or removed after detachment.
4. Based on the information provided on the plan, the proposed project could result in an increase of sewage flow which could be of considerable impact to the Sewer District's facilities downstream of the project site. Therefore, the Sewer District needs to perform a capacity analysis of the additional sewage anticipated to be generated by the new office buildings and delivered into the Sewer District facilities to determine whether the Sewer District facilities have sufficient capacity to accommodate the increased flow. The applicant will be responsible for the capacity analysis cost incurred by the Sewer District as it is a direct cost associated with the proposed development. This analysis and the design of any resulting upgrades to the Sewer District facilities must be completed and approved by the Sewer District prior to final approval of the building plans. The capacity analysis fees shall be paid by the applicant prior to final approval of the building plans.

5-2  
cont.

**Department of Public Works Road Services Comments**

1. Please provide the San Mateo County Department of Public Works Department with Appendix H so that we can review the trip generation methodology and calculations.
2. For the intersection of Edgewood and Alameda de las Pulgas, please provide 95% queue lengths under the TRANS-11 mitigation measure to ensure that retiming the signal from split phase to permissive turns does not cause the queues to go past the storage lengths in any movement for all considered scenarios.
3. Please include the following intersections in the analysis of all scenarios. We are concerned about local intersections impacted by both Stanford in Redwood City and Harbor View Project:
  - Spring and Douglas
  - Spring and Charter

5-3

- Bay and Douglas
- Bay and 2nd
- Edgewood Road and Crestview Drive
- Edgewood and Cordilleras Roads (both intersections)
- Highway 84 and Alameda de las Pulgas

4. The project should not commence construction until the funding for the Highway 84/101 interchange has been secured, agreements for construction with Caltrans have been finalized and contractors are mobilizing for the interchange construction. The impacts to North Fair Oaks and other unincorporated neighborhoods from the increases in traffic delay are too great to allow this project to proceed without this critical transportation improvement.

5-3  
cont.

**Site Drainage and Stormwater Treatment**

The EIR should evaluate the additional stormwater runoff from the increased impermeable surfaces to be created by the project onto adjoining County-owned land developed with a jail, particularly if the project’s resilience strategy involves filling the site to raise existing grades to address sea level rise. This comment was included in our NOP letter, and was not addressed in the DEIR.

5-4

**Land Use**

The DEIR states that evaluations of project impacts on the jobs housing balance is inappropriate on a project by project basis and should be confined to citywide and regional analyses. We believe, based on conditions in the current Bay Area housing market, and market conditions in the foreseeable future given housing production projections, that this statement is incredible. Many of the project’s impacts will be experienced in unincorporated North Fair Oaks and other nearby unincorporated neighborhoods, including Emerald Lake Hills, Devonshire, Palomar Park Sequoia Tract and West Menlo Park.

The North Fair Oaks community is approximately .4 miles from the project site. The proximity of North Fair Oaks to the project and the nearby Stanford in Redwood City campus now under construction, and its comparative affordability to other residential areas within reasonable traveling distance to these places of work, makes it more vulnerable to the traffic, housing, and parking impacts associated with nearby employment growth, which must be accounted for in the EIR.

5-5

The County is extremely concerned about the resultant increase in housing costs, as well as the inevitable displacement of existing residents, due to increasing housing costs fueled by the greater demand for nearby housing by project employees, including Stanford in Redwood City employees. We have seen the pattern play out in North Fair Oaks in response to the expansion of Facebook and other nearby San Mateo and Santa Clara County employers, whereby families have been displaced when landlords upgrade modest housing, double the rents and lease to tech employees. The current imbalance between employment growth and housing availability has grown to unprecedented levels, and the challenges of housing

residents of all income levels has never been greater. The project's demand for off-site housing units will certainly exacerbate this problem in a significant way. This is a significant project impact that must be addressed and is of great concern to the surrounding communities and should be addressed by the EIR.

↑  
5-5  
cont.

**Sea Level Rise**

San Mateo County appreciates the use of the 2018 Ocean Protection Council's Seal Level Rise Guidance in the proposed site design and construction. Raising the site elevation to account for 4 feet of sea level rise above BFE will provide protection of the site itself to about 2075.

**Adjacent Properties:** The current elevation of the Woodside Road undercrossing at Highway 101 is low and mapped as a flood zone by FEMA. The proposed Highway 101/84 Interchange project proposes to lower the Highway 84 roadway beneath Highway 101 exacerbating existing vulnerabilities to storm flooding and sea level rise. Highway 84 is a critical link to this project, and Seaport Drive would still be subject to inundation, leaving these routes impassible under moderate to high sea level rise conditions. Ignoring this flood risk could lead to regular nuisance flooding in the near term (for instance at high tides and during storms). With as little as 2 feet of sea level rise, Seaport Boulevard access to the project site is flooded, as is the adjacent PG&E site near the Highway 84 interchange. Two feet of sea level rise could occur as early as 2050. With 3 feet of sea level rise, all points of access to the site are flooded, essentially creating an island.

↑  
5-6

**Hazardous Waste Sites:** Hazardous waste sites, both existing and former can be exposed as sea levels rise, and subsequent groundwater table elevations change, allowing migration of contaminants. Impacts of changes in groundwater table elevation and effects on structural stability, corrosion and liquefaction, and redistribution of contamination from the Malibu Grand Prix site, Union Pacific locomotive release area and the Granite Rock Site potentially pose a risk.

**We Provide the Following Recommendations on Addressing Sea Level Rise Risks for the Proposed Harbor View Project:**

1. Due to the potentially significant impacts to adjacent infrastructure and access, and the potential for resuspension of contaminated materials at on-site and neighboring sites, we recommend Redwood City reconsider the placement of development at this site in its current design. This aligns with Redwood City's General Plan policies to reduce future flooding and to "protect residents, businesses and employees from potential hazards associated with the use, storage, transport, and disposal of hazardous materials in and through Redwood City." (PS-8).
2. If the first step is not feasible, we recommend the following evaluations:
  - a. Assess the potential impacts of flooding, sea level rise and groundwater intrusion on adjacent hazardous waste sites and potential for migration of contaminants.

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5-7  
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Lisa Costa Sanders

- 5 -

March 1, 2019

- b. Conduct a detailed sea level rise analysis for the project, and the services on which it depends, including but not limited to stormwater, sewer and flood conveyance, access and connectivity, and potential increased flood risk to nearby properties and infrastructure.
- c. Identify and implement mitigation strategies that would address the risks above, using a phased approach to align with the timing and extent of the future risks. Consider coordination with adjacent properties and landowners to minimize potential flooding impacts to these properties.

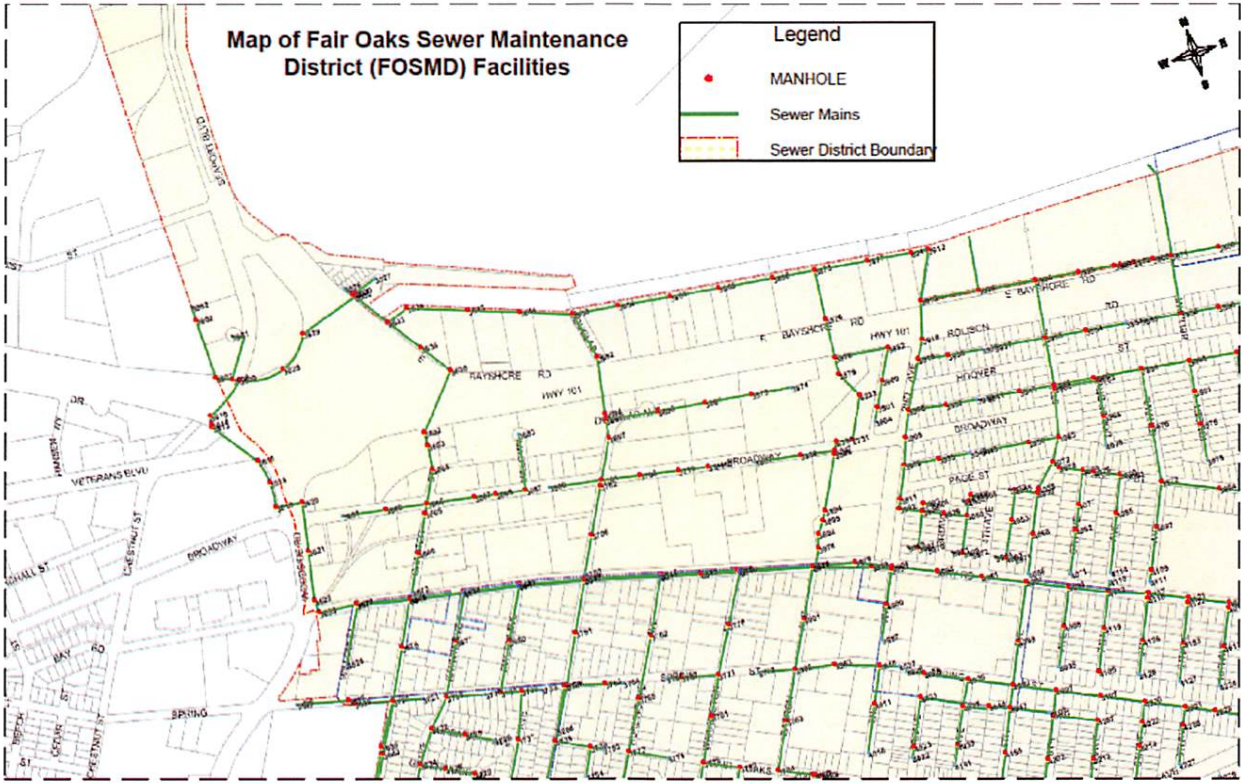
↑  
5-7  
cont.

Sincerely yours,

Joseph LaClair  
 Planning Services Manager  
 650/363-1865  
[jlaclair@smcgov.org](mailto:jlaclair@smcgov.org)

JEL:pac - JELDD0099\_WPN.DOCX



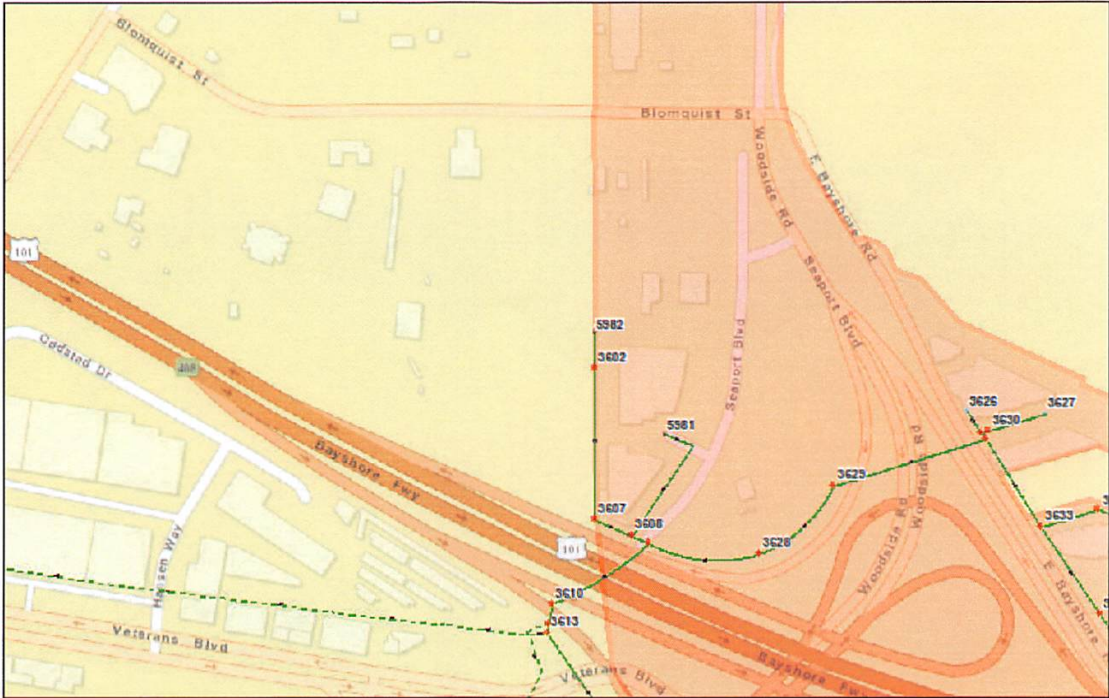


Lisa Costa Sanders

- 7 -

March 1, 2019

Sanitary Sewer Map



- February 5, 2018
- Sewer Flow
  - FLUSHING INLET
  - FLUSHING INLET
  - MANHOLE
  - TERMINUS
  - NCO
  - CO
  - FAIR OAKS SEWER DIST

1:4,514

0 0.0375 0.075 0.15 mi

0 0.05 0.1 0.2 km

Source: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand),

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**Letter 5            County of San Mateo Planning and Building Department**  
**Response            March 1, 2019**

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- 5-1            The Draft EIR assessed the cumulative effects of Project development for all environmental topics within the context of practicality and reasonableness as defined in CEQA Guidelines Section 15130(b). Impacts to the unincorporated communities listed in the comment were evaluated to the extent that cumulative effects would be likely to occur. For instance, as per standard professional practice, intersections were selected for analysis based on the likelihood of those intersections experiencing increases in traffic that would exceed applicable screening criteria.
- 5-2            This comment enumerates a number of requirements and restrictions with which the Project must comply, including the prohibition of building over existing mains; options for how the Project could address one or multiple sewer lateral connections to the sewer main; and the requirements for the Project to prepare a sewer capacity analysis and design and implement the infrastructure accordingly. Overall, the Project will be constructed and implemented in accordance with all existing regulations of the Sewer District, unless special allowances or variances are requested, considered and granted.
- Impact UTIL-1 in the Draft EIR discusses the potential for the Project to result in considerable sewer flows, and finds that the Project would have a less-than-significant impact on capacity and infrastructure. This impact analysis conclusion relies on the findings of a *Utility Feasibility Study* (BKF Engineers, 2018), which takes into account the Silicon Valley Clean Water (SVCW) and Redwood City sewer relocation review process and mitigation fees. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. The conditions of approval for the Project will ensure that applicable District requirements are followed.
- 5-3            With respect to the comment’s request for “Appendix H” for “trip generation methodology and calculations,” this is assumed to be the Draft EIR’s Appendix F, Transportation and Traffic Detail, which was included as part of the Draft EIR publication and is available for reference. As noted in the Draft EIR, “due to the length of this appendix, it is provided digitally with this document, on the City of Redwood City’s website, and is also available for viewing at the City of Redwood City Community Development Department.”
- Mitigation Measure TRANS-11 includes signal timing changes at the intersection of Edgewood Road and Alameda de las Pulgas that would change some approaches from split phasing to permissive phasing. As the comment notes, this change has the potential to alter queue lengths at the intersection. Although



Redwood City does not require 95<sup>th</sup> percentile queues to be reported for determining significant impacts at intersections, a queuing analysis was performed for this intersection to ensure that changes to the signal timing would not adversely affect queuing. Under the mitigated scenario, 95<sup>th</sup> percentile queue lengths are expected to be shorter than under the unmitigated Plus Project scenario and the Existing (no Project) scenario for all movements based on the Synchro software outputs.

The County provided a list of intersections that it wanted the City to consider studying as a part of the EIR. These and other candidate intersections were evaluated in consultation with City staff using preliminary outputs from C/CAG and City travel demand models, based on the expected amount of traffic that would be added to those intersections. Intersections were included as study intersections if the amount of added Project traffic was likely to cause an intersection to operate at an unacceptable level of service or if it would add a substantial amount of traffic to an intersection already operating at an unacceptable level. Many of the candidate intersections provided in the County's list did not meet the selection criteria. Although some Project-generated traffic may travel through those intersections, that traffic would be unlikely to cause a significant impact at intersections further from the Project site. Those intersections that did meet the criteria (e.g., Edgewood Road/Alameda de las Pulgas) were carried forward for evaluation.

Impacts and mitigation measures identified in the Draft EIR were made independent of the 101/84 interchange being built. Due to the uncertainty surrounding funding and timing of the interchange's construction, all significant impacts that would be mitigated to less-than-significant (LTS) with the interchange are considered significant and unavoidable (SU).

- 5-4 With respect to the comment about the EIR's treatment of stormwater runoff from the Project site onto adjacent sites, the commenter is referred to Section 4.8, *Hydrology and Water Quality, of the Draft EIR*, which analyzed the topics raised in this comment. Specifically, pages 4.8-10 to 4.8-11 and pages 4.8-14 to 4.8-17 address the local regulatory policies that apply to the Project and the Project's potential runoff and water contamination impacts. As described in the Draft EIR, the Project would be required to demonstrate compliance with the Redwood City Engineering Standards, including completion of the C.3 and C.6 Development Review Checklist, and implementation of the City's Low Impact Design (LID). Through these standard processes, the Project would be required to develop a drainage plan that complies with the City's drainage design standards, and the requirements of the San Mateo Countywide Stormwater Pollution Prevention Program (STOPPP) and Provision C.3 NPDES requirements, which include requirements for flow control. In addition, the BKF *Utility Feasibility Study*, which was cited in the Draft EIR's *Hydrology and Water Quality* section,

provides preliminary design requirements noting, “the new and relocated storm drainage systems will be designed per the City’s storm drain design criteria. The system will be designed to convey the 100-year flow and maintain the HGL [hydraulic grade line] at least 6-inches below the rim elevation of inlet,” and that the “storm water detention facilities will be designed and incorporated to store the volumetric increase in the peak flow rate. The outflow connection from the proposed storm drain system to the existing storm drain system will be controlled through a weir structure and orifice opening in order to maintain the 30-year post-development peak discharge flows at a level that is less than or equal to 10-year pre-development levels.” Ultimately, the Project would be required to meet City standards that would ensure that offsite flow levels are not greater than pre-development levels.

As noted in the Draft EIR’s *Project Description* (page 3-8), stormwater from the Project site would be routed to the City’s stormdrain network, which then discharges to the Bay via an existing pump station. In general, pump stations are more resilient to sea-level rise than gravity-drained systems. Based on the analysis of the Draft EIR, even with sea level rise (see Master Response 2 in Chapter 5 of the Final EIR), stormwater would be adequately treated onsite and would not generate off-site impacts.

- 5-5 Refer to Chapter 6 of the Draft EIR, *Impact Overview and Growth Inducement*, which addresses the Project’s potential to result in growth inducement, as well as Master Response 3 in Chapter 5 of this Final EIR, relating to jobs/housing balance and environmental impacts. As noted in Master Response 3, the information provided therein is for informational purposes, as the issue of jobs/housing balance is outside the purview of CEQA and has no significance criteria. Further, discussion of physical impacts on specific neighborhoods due to increased employment from the Project is speculative and cannot be known at this time.
- 5-6 With respect to the comment for the treatment of sea level rise related impacts, refer to Master Response 2 in Chapter 5 of this Final EIR, which addresses the EIRs treatment of flooding impacts related to sea level rise. With respect to the comment for Project impacts related to hazardous materials and site stability, refer to the following sections of the EIR: 4.5, *Geology and Soils*, and 4.7, *Hazards and Hazardous Materials*, which address these topics and identify mitigation measures,
- 5-7 Refer to Master Response 2 in Chapter 5 of this Final EIR, relating to sea level rise.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4  
P.O. BOX 23660  
OAKLAND, CA 94623-0660  
PHONE (510) 286-5528  
www.dot.ca.gov



*Making Conservation  
a California Way of Life!*

March 18, 2019

Steve Turner, Planning Manager  
Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

SCH# 2018012016  
04-SM-2018-00235  
GTS ID 9212  
Post Mile: SM – 101- 5.378

**Harbor View Point – Draft Environmental Impact Review (DEIR)**

Dear Steve Turner:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR.

***Project Understanding***

The proposed project is a high-tech office campus with four seven-story (100-foot tall) office buildings, one four-story and one six-story parking structure and a one-story employee amenities building. The office campus is centered with an approximately four-acre green space, and ten percent of the site is reserved for public access. The proposed project will develop 1,179,747 square-foot (sf) of commercial office use, in addition to 35,000 sf of amenities use. The four proposed office buildings are each approximately 286,000 sf. The proposed project includes up to 3,855 on-site parking spaces. The project is located to the east of US Route 101 (US 101), and is just northeast of the intersection of US 101 ramps with State Route (SR) 84 Woodside Road/Seaport Boulevard (Blvd). Since this project meets the criteria to be deemed of statewide, regional or areawide significance per CEQA Section 15206, the project's FEIR should be submitted to both the San Mateo County Transportation Authority and MTC for review and comment.

***Sea Level Rise***

The effects of sea level rise may have impacts on transportation facilities located in the project area. Executive Order (EO) S-13-08 directs State agencies planning construction projects in areas vulnerable to sea level rise to begin planning for potential impacts by considering a range of sea level rise scenarios for years 2050 and 2100. Higher water levels may increase erosion rates, change environmental characteristics that affect material durability, lead to increased groundwater levels and change sediment movement along shores and at estuaries and river mouths, as well as affect soil pore pressure at dikes and levees on which transportation facilities are constructed. All these factors must be addressed

6-1

Steve Turner, Planning Manager  
 Redwood City  
 March 18, 2019  
 Page 2

through geotechnical and hydrological studies conducted in coordination with Caltrans.

↑ 6-1  
 cont.

***Hydraulics***

Impact HYD-6 does not mention the flood flow that will be redirected due to placement of the slab in the floodplain. Nearby residential and commercial buildings would be impacted by the displacement of flood flow from the project.

6-2

***Transportation Impact Fees***

The proposed project has identified that the two-freeway segments, southbound US 101 north of Whipple Avenue and northbound US 101 south of Woodside Road during AM peak hour are both significantly impacted because of project added trips. The impact of the project can be mitigated by paying its fair share contribution to the US 101 Express Lane Project.

6-3

***Vehicle Trip Reduction***

Given the project's intensification of use and significant amount of vehicle parking spaces, the project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Parking should be reduced significantly. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit subsidies to employees on an ongoing basis;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Showers, changing rooms and clothing lockers for employees that commute via active transportation;
- Emergency Ride Home program;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

6-4

Transportation Demand Management programs should be documented with annual monitoring reports

Steve Turner, Planning Manager  
Redwood City  
March 18, 2019  
Page 3

by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on nearby State facilities. These smart growth approaches are consistent with the MTC’s RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

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6-4  
cont.

**Lead Agency**

As the Lead Agency, Redwood City is responsible for all project mitigation, including any needed improvements to the STN. The project’s financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures, prior to the submittal of an encroachment permit. Potential mitigation measures that include the requirements of other agencies—such as Caltrans—are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

**Encroachment Permit**

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Should you have any questions regarding this letter, please contact Michael McHenry at (510) 286-5562 or Michael.Mchenry@dot.ca.gov.

Sincerely,

PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse

**Letter 6**                    **California Department of Transportation**  
**Response**                   **March 18, 2019**

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- 6-1                    Refer to Master Response 2 in Chapter 5 of this Final EIR, relating to sea level rise.
- 6-2                    The Draft EIRs analysis under Impacts HYD-3 through HYD-5, commencing on page 4.8-15, describe the Project’s impact to stormwater runoff and flood flows and how compliance with regulatory permits and associated requirements would avoid impacts to offsite areas. As a condition of approval, and as a matter of applied law, the Project applicant would be required to comply with all applicable regulations relating to stormwater flows and offsite/downstream impacts associated with stormwater and flood flows from the site. If the Project is approved, the City would welcome the Department’s cooperation during the development review process.
- 6-3                    The comment suggests that the Project’s impacts to mainline segments of US 101, which are addressed in Impacts TRANS-12 and TRANS-14 in the Draft EIR, could be mitigated by the Project’s fair share contribution to the US 101 Express Lane Project. Specifically, the Draft EIR identified Mitigation Measure TRANS-12A on page 4.14-45 of the Draft EIR, and Mitigation Measure TRANS-14A on page 4.14-48 of the Draft EIR, in addition to Mitigation Measure TRANS-28A, to address these impacts with mixed-flow and/or HOV lanes on US 101 southbound north of Whipple and northbound south of Woodside Road. The Draft EIR also describes a second phase of the US 101 Express Lanes Project as an express lane in each direction of US 101 between Whipple Avenue in Redwood City to just north of Interstate 380 in South San Francisco.
- As discussed in the comparative analysis of Transportation/Traffic in Chapter 2 of this document, since publication of the Draft EIR, the improvements in Mitigation Measures TRANS-12A and 14A have already been fully implemented by others, and no further related improvements are planned. Implementation or fair share contribution by the Project Applicant is no longer required. No additional analysis is required.
- 6-4                    Transportation Demand Management (TDM) is described in Section 4.14.9. A draft TDM Plan was prepared by the applicant’s consultant for the Draft EIR Project (Appendix F.5 of the Draft EIR) and includes many of the measures suggested by the commenter. A TDM Plan is listed as a secondary mitigation measure for several significant impacts identified in the Draft EIR.
- The *Site TDM Plan for the Harbor View Project (2022)* (Site TDM Plan) prepared for the Applicant's Revised Project (Appendix B to this document)

would achieve at least a 20.7 percent reduction in vehicle miles traveled (VMT) and associated GHG emissions (a 22.0 percent reduction is proposed). See these comparative analyses in Chapter 2, and see Table 5-2 in Chapter 5, *Master Responses*, of this document.



March 8, 2019

SENT VIA EMAIL

Ms. Lisa Costa Sanders, Contract Principal Planner  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063  
[lcostasanders@redwoodcity.org](mailto:lcostasanders@redwoodcity.org)

Subject: Public Comments on the Harbor View Project Draft EIR

Dear Ms. Costa Sanders:

Thank you for the opportunity to provide comments on the Harbor View Project Draft EIR. Graniterock has a long standing in the City of Redwood City providing aggregate, concrete, asphalt as well as recycling for concrete and asphalt across the street from the proposed project.

I would like to start by saying that we are supportive of a redevelopment of this site. As the former property owner, Graniterock sold its excess holdings at this location for the purposes of redevelopment. We appreciate that the proposed project shows building setbacks and parking structure locations that would shield the occupants of this project site from the industrial operations across Blomquist, including Graniterock's operation.

7-1

One item that doesn't appear to be shown in the plans is the location(s) of the driveways to and from this project in comparison to Graniterock's driveways across Blomquist. We want to collaborate with the developer to ensure that traffic at our driveways is not impacted by the peak hour traffic to and from the project. This could have a negative unintended consequence to our business that may be avoided through additional planning and/or mitigation measures.

7-2

Again, we want to thank the city for the opportunity to comment on this project and we look forward working with the project proponent going forward.

Sincerely,

Pat Mapelli, Land Use Manager



**Letter 7**      **Graniterock**  
**Response**    **March 8, 2019**

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- 7-1                      Refer to Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.
- 7-2                      With respect to the Project’s potential to create hazards concerning site access, the Draft EIR considered site access and circulation related to construction and operation under Impact TRANS-16, and Impact TRANS-30. Figure 4.14-9 in the Draft EIR shows the proposed site plan with recommendations to improve site circulation. These circulation recommendations were based on a review of the proposed site plan in context of the surrounding area, including the existing Graniterock operations and existing driveways along Blomquist Street. A traffic simulation of the proposed site driveways was prepared and resulted in no additional recommendations to the site plan beyond those identified in Figure 4.14-9 of the Draft EIR. Therefore, access to existing driveways along Blomquist Street would be maintained with implementation of the Project analyzed in the Draft EIR. As described in Chapter 2 of this Final EIR, the applicant has submitted a Revised Project which incorporates a left-turn and right turn egress lanes from the Project site onto Blomquist Street; see illustration of the Revised Project site plan in Figure 2-1 in Chapter 2 of this document. Although additional egress lanes are provided, the driveway locations along Blomquist Street remain as analyzed in the Draft EIR.



Steven Turner, Planning Manager  
City of Redwood City Planning Department  
1017 Middlefield Road  
Redwood City, CA 94063  
Via email: sturner@redwoodcity.org

March 8, 2019

SUBJECT: COMMENTS ON HARBOR VIEW PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Turner,

Grassetti Environmental Consulting (GECO) has been retained by an alliance of organizations and individuals (identified at the end of this letter) to review the Draft Environmental Impact Report (DEIR) for the Harbor View Project. As GECO’s principal, with over 35 years of California Environmental Quality Act (CEQA) experience, I have reviewed the DEIR for compliance with CEQA requirements. As detailed below, the DEIR is deficient in a number of key areas, including the project description; cumulative analyses; aesthetics, biological resources, traffic, air quality, geology, hydrology, water demand, and jobs/housing technical analyses; and alternatives.

**Improper Use of CEQA Initial Study Checklist and Criteria/Thresholds of Significance**

The DEIR slavishly uses the Initial Study (IS) checklist items as its criteria and thresholds of significance for most topics. As detailed below, this approach results in a document that misses some of the most important issues, while requiring the reader to wade through detailed discussions of irrelevant items. An IS, which is a screening document to direct further CEQA review, is very different than an EIR, which conducts the detailed review. Further, the use of IS checklist items as thresholds of significance is in error. With the exception of the Mandatory Findings of Significance, an IS checklist does not provide any thresholds or criteria of significance. Rather it identifies topics to be evaluated during the screening for potentially significant impacts. The DEIR should be revised to focus on actual impacts of potential significance, not the often-irrelevant CEQA checklist questions. Please note that this EIR uses the “old” CEQA checklist questions, and not the new ones, which leads it astray in the Traffic VMT analysis.

8-1

**Project Description**

Section 15124 of the CEQA Guidelines, which identifies requirements for an EIR Project Description, codifies the ruling in *County of Inyo v. City of Los Angeles*. The state court of appeal declared that an accurate, stable, finite project description is an essential element of an informative and legally sufficient EIR under CEQA. Additionally, CEQA defines a project as “the whole of an action...which has a potential for resulting in.... a physical change in the environment...” (Guidelines Section 15378). The DEIR fails to provide an adequate, stable project description for the Harbor View project, and fails to assess the whole of the action.

Specifically, the project description is inadequate because:

- 1) The project description is unclear as to whether the Blomquist Bridge construction is or is not a part of the project. The Biology and Aesthetics sections assume it is, but the other sections do not. Once in place, the Blomquist bridge, provides an alternate to the freeway as Blomquist Street would connect both the Whipple Ave. and Woodside Rd. interchanges along the bay front. Given that the City’s Climate Action Plan is to not increase GHG with increased auto traffic, adding a feeder road caused by the bridge would likely encourage more auto traffic and thus increase the project’s VMT. 8-2
- 2) As described below, the project description fails to identify quantities and transportation of fill needed to raise the site above future flood levels. 8-3
- 3) As described below, the DEIR is unstable with respect to the anticipated number of employees who would work in the buildings – this affects the accuracy and stability of all of the other assessments that depend on employment numbers, including, but not limited to, jobs/housing, public services, utilities, traffic, air quality, greenhouse gas emissions, and traffic-related noise. 8-4

**Technical Deficiencies**

*Cumulative Impacts, Growth Inducement, and Jobs/Housing Balance*

CEQA requires that an EIR assess the additive and synergistic impacts of past, current, and likely future projects. These can be either in a list or based on a plan, or a combination of both approaches. The project DEIR includes a list of reasonably foreseeable (likely) future projects (presented in Table 4.0-1). However, this list fails to include all of the current and likely projects contemplated in the General Plan, fails to consider recently-constructed projects, and erroneously includes the previous Harbor View project as one of the listed cumulative projects. This results in potentially inaccurate cumulative analyses in traffic, air quality, greenhouse gas, and public utilities assessments. 8-5

Given the development pressure in the Redwood City area, in addition to a corrected list, 8-6

the DEIR should consider all potential development envisioned by the City’s current General Plan. The General Plan envisions a total of approximately 7.83 million square feet (MSF) of non-residential development (with Cargill development) or 6.68 MSF without Cargill. Of this total, approximately 1.16 MSF has either been built or is under construction, and about 2.69 MSF is under City review (most of which is listed on Table 4.0-1). The net available non-residential development under the General Plan is 3.97 MSF (with Cargill) or 2.83 MSF without Cargill. Given that the project is asking to amend the General Plan to increase development density at the site, the DEIR cumulative analyses should include, at a minimum, the additional 2.83 MSF designated for development under the City’s General Plan. The approved and potential development should also be incorporated into the DEIR’s Population Growth and Jobs/Housing analyses (discussed below).

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8-6  
cont.

*Growth Inducement*

The DEIR’s discussion of Growth Inducement also is inadequate because it fails to adequately address the effect of increasing the jobs/housing imbalance in Redwood City on development of new housing for project employees within unprotected open-space lands, such as the nearby Cargill salt ponds, or redeveloped areas within Redwood City, as well as other areas of the west and east bay, and more distant areas of eastern Alameda, Contra Costa Counties, western Stanislaus County, and southern Santa Clara County. This growth inducement would result in increased traffic, noise, air quality and greenhouse gas impacts associated with long-distance commuting to the site from employees who cannot find affordable housing in the Redwood City area (or elsewhere on the Peninsula or Silicon Valley).

↑  
8-7

This growth would also increase the demand for affordable housing. As described below, the jobs/housing balance analysis in the EIR fails to provide adequate and accurate information to decision-makers as follows:

Impacts POP-1 and POP-1.CU.

- The Population growth analysis focuses entirely on employees, yet the population is only 50% employed, with the remainder being under 18, over 65, or unemployed. Therefore, the population growth analysis in Impact POP-1 is about 50% too low.
- The discussion in POP1-CU further states that “the difference in Citywide General Plan employment growth with and without the project would be comparable – 5.4% and 6.7%, and less than the 12.8% employment change forecast countywide.” This is false. General Plan population growth w/o the project would be about 13.5% (2018 to 2030). Employment growth of General Plan plus the project would be about 17%. Both of these would **exceed** the County planned growth rate of 12.8%.
- In addition, the 250 sq/ft per employee average used in the DEIR to estimate the project’s employee count at 4,579 appears seriously outdated. According to real estate data provider CoreNet Global, North American offices will have averaged 151

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8-10

square feet per worker by 2017 – down from 176 square feet in 2012 and 225 square feet in 2010 (<https://mehiganco.com/?p=684>). Unless there is independent data to justify the larger office space/employee ratio for this project, a lower square foot per worker ratio on the order of 150sq/ft per employee should be used as evidenced by current design recommendations (<https://www.wbdg.org/space-types/office>). Thus, it appears that the DEIR’s traffic, air quality, greenhouse gas, services, growth inducement, and noise analyses for the project, as well as the cumulative impacts analyses of these topics, may be substantially underestimated.

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8-10  
cont.

- The Cumulative Impacts assessment fails entirely to address the project’s impacts in the context of the ever-worsening Peninsula/Silicon Valley housing deficit.

8-11

*Jobs/Housing Balance*

The Jobs/Housing balance analysis in the DEIR (Section 4.11.7) is flawed as follows:

- First, the “net daily inflow of 26,552 workers” assumes that all 41,688 employed residents work in Redwood City. Later, the DEIR acknowledges that only 57% of Redwood City’s employed residents work in Redwood City. So the actual inflow (and outflow) of workers is much higher than disclosed in the DEIR.

8-12

- The employment analysis on p. 4.11-3 states that there was an approximately 10,000 employee increase in the past 10 years, yet projects only 9,000 new jobs in the next 21 years. Please describe the reasons for this discrepancy between actual annual employment growth and projected annual growth.

8-13

- Second, the housing demand of 2043 units is not reflective of the actual demand that would result from the project’s assumed 4579 employees. Current per-unit occupancy in Redwood City is about 2.75 resident/unit, of whom about half are employees, with the remainder being under 18, over 65, or not in the job market. So, the housing demand would be closer to 2300 units. Even using the City’s current ratio of 2.1 jobs/housing unit would yield a housing demand of nearly 2200 units. A larger housing demand from the project should be considered.

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- The jobs/housing balance then uses a 50% retention of employees choosing to stay in Redwood City (p. 4.11-11), making half of the problem just disappear, rather than acknowledging that those new employees would worsen the regional jobs/housing imbalance.

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- The DEIR states that 3,333 new housing units could be constructed in the City by 2023, and could therefore accommodate many of the project’s workers. However, it fails to note that over 1000 of these units have already been constructed, that Redwood City has recently approved over 1 million square feet of commercial development, or that there are over 2.6 million square ft of commercial office projects currently under review – the result of which will far outstrip the City’s currently identified housing capacity *without* the project. Therefore, there is no

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housing capacity within the City that would adequately accommodate project workers, and thus, additional housing demand caused by the project would indirectly result in housing displacement.

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cont.

- The DEIR concludes that “...the new housing demand that may result from the project...could be adequately addressed in part by the anticipated housing units expected to be developed by 2040.”
  - First, it is not clear what is meant by the self-cancelling phrase “adequately addressed in part”.
  - Second, the “analysis” is just in terms of percent increase in housing, and does not discuss the actual increase in demand nor does it address the increase in housing demand from other local and regional office development by 2040. The supply side is there, but not the demand, so the conclusion of “adequately addressed” is entirely unsupported.
- The VMT assessment in the Traffic section (p. 4.14-31) assumes an average 26-mile commute for project employees. This also implies that most residents will not find housing in Redwood City, and the project will add to the regional housing crisis, increased housing costs, regional roadway congestion, and air pollution.
- The cumulative office development under the General Plan would outstrip identified housing capacity, further worsening the local and regional housing crisis. As described above, the failure of the Cumulative Impacts assessment to consider over 2 million sq. ft. of additional (beyond that included in the Cumulative Project table) new office space that would be permitted under the City’s General Plan results in the EIR failing to fully describe the housing imbalance to which the project would cumulatively contribute above and beyond what is allowed in the General Plan. The DEIR should be revised to include this local and regional impacts discussion.
- The DEIR should address where there is a surplus of housing within the assumed 26-mile commute zone, and whether other existing local-area residents would be displaced, adding to their commute distances and, indirectly to emissions of criteria pollutants, TACs, and GHGs.
- The “Housing Affordability” discussion on p. 4.11-3 fails entirely to address the impacts of the project and cumulative development on housing affordability in Redwood City and the region. It includes no actual analysis of impacts on housing affordability.

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*Other Technical Deficiencies*

Aesthetics. The DEIR defers preparation of the shade and shadow study to a future date (p. 4.1-19). That study should be included in the DEIR because the project proposes public open space that may be compromised by the shading. The shadow discussion fails to address the impacts of the tall buildings on the public open space adjacent to the buildings,

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which are considered a project amenity. In addition, the nearby location of a designated wetland habitat near the project site (see below under Biological Resources) could potentially be negatively impacted by building shadows. Please add this analysis to the EIR.

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cont.

Impact AES-3. The EIR has no actual analysis of light and glare impacts. Instead it just assumes full mitigation by City light policies. However, the construction of four tall buildings will clearly be a substantial new source of light and glare visible from both near and distant viewpoints. Given the lack of analysis, complete absence of supporting evidence, and obvious large-scale lighting effects, this impact should be considered significant and unavoidable.

8-23

Biological Resources. Under “Existing Conditions”, *Figure 4.3-1 Project Habitat Types* misidentifies an area of muted tidal marsh located diagonally across Seaport Boulevard from the project as “salt pond”. These 2.9 acres meet the federal definition of wetlands and are located between Seaport and the Cargill salt pond levee.

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The DEIR, pp. 4.3-32-33, identifies a potentially significant impact associated with bird strikes. And makes a “recommendation” to reduce this hazard to sensitive avian species. It avoids calling the impact significant, or requiring mitigation for it, because of a shift in federal regulations regarding species protection. Specifically, the DEIR states:

*Due to recent changes to the federal MBTA, the incidental “take” of migratory bird species is not prohibited by the MBTA or Fish and Game Code (USDOJ, 2017; USFWS, 2018). Because the take of migratory birds is not prohibited by CDFW or by the MBTA based on federal guidance, potential impacts to avian species from collision with new buildings would be less than significant with no mitigation required.*

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CEQA case law has made it clear that it is not concerned with the (currently capricious) status or interpretation of federal regulations, nor is it solely a law to assure that other regulations are adhered to - CEQA is concerned with identifying, disclosing, and reducing impacts to the environment, regardless of other regulations. (See, for example, *Berkeley Keeps Jets Over the Bay v. Board of Port Commissioners, 2002*). Therefore, the significance of this impact must be clearly described and, if necessary, mitigation measures must be identified to reduce or eliminate the impact. Any residual effects after mitigation also must be described, as well as the residual significance of the impact.

8-26

Traffic – General Employment Assumptions. The DEIR’s traffic analysis appears to be based on employment numbers from the ITE manual, Code 710, which assumes 3434 employees from the project’s approximately 1.145 million square feet of office space (approximately one employee per 333/sq./ ft). This is about 33% lower than the EIR’s stated employment at the site of 4579 workers. ***If the traffic analysis is based on the ITE number of employees rather than the project’s stated estimate, then the traffic assessment understates the project impacts by about 33%.*** This would result in the entire analysis being fatally flawed.

8-26

Traffic- Vehicle Miles Traveled. The VMT analysis is based on an estimate of 3434 employees at the site. This is far lower than the estimate of 4579 employees in the jobs/housing analysis. ***This implies that the VMT analysis is understated by around 25-33%. The analyses should be re-done with the assumed 4579 employees or a more appropriate employee count as discussed above.***

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In addition, the VMT analysis fails to include any discussion of impact significance. In fact, VMT is never mentioned in the Criteria of Significance listed on pp. 4.14-26-27. As described in the Governor’s Office of Planning and Research’s ‘Technical Advisory on Evaluating Transportation Impacts in CEQA, p. 10, “a fifteen percent reduction is consistent with SB 743’s direction to OPR to select a threshold that will help the State achieve its climate goals.” That document goes on to strongly suggest the use of a 15% reduction in VMT as the threshold of significance for VMT. Therefore, using the existing average VMT in the area times the number of employees, as the DEIR does on p. 4.14-31, results in a significant impact. ***The DEIR fails to identify, disclose, or mitigate this significant impact.***

8-27

Even if the TDM plan described later in the traffic section were to be entirely successful, it would fail to meet the 15% VMT reduction significance threshold (DEIR p. 4.14-31). In addition, given the West and South Bay’s large jobs-housing imbalance, which are not addressed at all in the DEIR, along with the erroneous use of 3434 employees instead of 4579 employees, VMT impacts may actually be far greater than assumed/calculated in the DEIR.

8-28

Traffic – Freeway Congestion. The EIR fails to address project and cumulative impacts on mainline segments of US 101. Please add.

8-29

Traffic – Intersection Analysis. The DEIR fails to analyze any intersections west of El Camino Real, with the exception of the Alameda-Edgewood Road intersection. Commuters attempting to avoid traffic on US 101 will likely use I-280 and exit at Woodside Road and Farm Hill Blvd., in addition to the Edgewood Road interchange, and travel through mainly residential neighborhoods to reach the project site. Currently impacted intersections during commute times, such as Woodside Road and Alameda, Farm Hill Blvd, and McGarvey Ave. (heavily impacted by Canada College traffic). McGarvey Avenue and Fernside, Whipple Avenue and Alameda, and Whipple Avenue and El Camino, should also be analyzed to assess potential impacts to residential areas of the city.

8-30

Air Quality. See Traffic comments above: The first paragraph on p. 4.2-27 of the DEIR states that the project-operation air-pollutant emissions calculations are based on the 8090 daily-vehicle-trip generation factors that are, in turn, based on the erroneous 3434-employee trip generation (see Table 4.14-8). This would result in an approximately 33% underestimation of project emissions. ***If this erroneous employment factor was, in fact, used as the basis for the operational emissions calculations, then the entire air quality***

8-31



***assessment is inadequate and must be redone.***

Greenhouse Gas Emissions. What is the correct service population basis for the GHG emissions calculations - 3434 employees or 4579 employees? Given the comments above concerning the employee estimate of 4579 employees, this analysis should be re-evaluated with numbers more appropriate to the likely employee count at the project site. In addition, a considerable amount of traffic on Seaport Blvd. consists of large diesel trucks traveling to/from industrial facilities near the port. These vehicles, forced to idle as a result of delays around the Woodside/101 interchange are a significant source of air pollutants and GHG. It is unclear if the existing traffic model takes this effect into account; if not, analysis of pollutants from delayed truck traffic should be conducted as has been the case in evaluating impacts near the Port of Oakland.

8-32

Traffic and Air Quality Impacts of Fill During Project Construction. The DEIR indicates that "Grading activities associated with the Project would include raising the level of finished floor elevations at least one foot above the current FEMA base flood elevation of 10 feet NAVD88 plus an additional three feet to accommodate anticipated future sea level rise, i.e. total fill increase of four feet, to at least 14 feet NAVD88." This large amount of fill will likely result in traffic, greenhouse gas emissions, and air quality impacts during construction, but they are currently not assessed in the DEIR. Total amount of fill, number of truck trips per day over what length of time, and the truck routes traveled would need to be calculated and disclosed, with potential impacts evaluated.

8-33

Geology and Soils. Impact 5.5.5. The liquefaction analysis does not address impacts to infrastructure, and is limited to the buildings themselves. The DEIR acknowledges that the project site has an extremely high liquefaction potential- what would happen to roadways accessing the site, utilities, emergency access, etc.? Would over 4,000 people be marooned at the site in a major earthquake?

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Hydrology. The sea level rise assessment does not address adaptation to sea level rise plus impacts from storm surges exceeding three feet, nor is the issue of impacts to site drainage as sea level rises addressed - how would the project site drain in the event of several feet of sea level rise?

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The Blomquist Bridge construction project is not addressed under hydrology. Please assess its impact on water quality (construction) and flooding (post construction).

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Water Demand. As with the previous EIR, this EIR's water demand calculation assumes that the buildings on the site are occupied, which they are not in any significant amount, thereby underestimating the net increase in water demand. The DEIR inconceivably asserts that the site currently has a potable water demand of 27,506 gallons/day and the project would result in a net new demand of only 5757 gallons/day. In reality, given there is a net zero demand on the site currently, the project increase in potable water consumption would be over 33,000 gallons/day. The Water Supply Assessment was based on a net

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increase of 5830 gallons/day, while the project would increase it by over 33,000 gallons/day. The analysis needs to be redone using the correct baseline, which is existing conditions.

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**Project Objectives**

CEQA Guidelines Section 15124, Subsection (b) emphasizes the importance of a clearly written statement of objectives. Compatibility with project objectives is one of the criteria for selecting a reasonable range of project alternatives. Clear project objectives simplify the selection process by providing a standard against which to measure possible alternatives.

The Harbor View project “Objectives” in the DEIR (p. 5-2) are so vague as to provide no guidance regarding alternatives or whether or not the project even meets its own objectives. Terms such as “respecting views”, “develop[ing] a lively working environment’, creating a “day/night environment that is safe and enjoyable for residents/employees, and visitors” (it’s an office complex- has no residents or nighttime employees/visitors), providing for new and improved transportation connections to downtown (the HV project doesn’t- in fact, it makes circulation worse), “plan for circulation compatibility” (the HV project doesn’t), and “provide publicly accessible recreational...amenities” (it doesn’t – it has only some landscaped areas and walkways in between the buildings) are both meaningless and where they may have some meaning, are in conflict with the project as proposed. Simply stated, the project does not even meet some of its own objectives.

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The Project Objectives should be entirely re-written to address the objectives of the proposed project, which are to provide office space, generate profit to the developers, and generate income to the City from taxes and fees and should explain why development of a commercial office project that contravenes the General Plan provides net benefit to the City.

**Alternatives**

CEQA requires that EIRs consider a range of reasonable alternatives that achieve most of the project objectives, even if they cost more than the project (Guidelines Section 15126.6 a-c). While the DEIR includes a number of alternatives to the project, none of the alternatives meet CEQA requirements to substantially reduce impacts of the project and, as feasible, reduce some or all of the project’s significant unavoidable to a less-than-significant level. Instead, the alternatives other than “No Project” incorporate arbitrary reductions in the project size or change in use, that don’t eliminate any significant unavoidable project impacts. Therefore, the DEIR fails to assess a reasonable range of alternatives that would substantially reduce one or more of the project’s impacts.

Specifically:

- The No Project- Existing Zoning Alternative is not a true no-project alternative because under California Planning Law, the zoning must be consistent with, and is subservient to, the General Plan designation. Therefore, this alternative would not be feasible without a General Plan amendment. | 8-39
- The Reduced Buildout/Building Height Alternative is not enough of a reduction to reduce any significant impacts of the project to less-than-significant levels. Therefore, that alternative should be revised based on air quality and traffic screening studies to actually reduce some or all of the significant unmitigable impacts of the project to less-than-significant levels or, at minimum, to reduce significant impacts to no greater than those identified under the No Project/Existing General Plan Alternative. | 8-40
- The Onsite Public Amenities alternative should also reduce the building heights and sizes. Absent that, it is a “straw man” alternative that has more development, and therefore more impacts than the “Reduced Buildout” alternative. This alternative should have the reduced heights of the “Reduced Buildout” alternative, plus replacing one of the buildings with a sports field. That would be a true “Environmentally Superior” alternative, in that it could reduce impacts to a greater extent than full buildout under the current General Plan maximum buildout. | 8-41
- The EIR should acknowledge that the current General Plan buildout is the maximum permitted, not the minimum or average, and development to those maximums are not permitted by right in a planned development such as the project. Rather, the City may use its discretion as to the appropriate development levels up to those maximums. A General Plan Alternative that is less than those maximum levels and better meets the project’s recreational and transportation objectives also would be appropriate. | 8-42
- The Alternative Site Location alternative should show specific potential alternative sites in the Seaport Boulevard, Seaport Center, and Pacific Shores areas. Absent any specific sites, the assessment is so vague as to be meaningless, and is fundamentally unsupported by evidence. No alternative site location is identified and no actual impact analysis was done. | 8-43
- The DEIR’s conclusion that the Reduced Buildout Alternative would best meet the project objectives is unsupported by fact- it appears that a reduced version of the Public Amenities Alternative would better meet these objectives, as would the General Plan Buildout- No Project Alternative. In any case, there is nothing in the Objectives requiring the development of office uses – lower-intensity uses would far better meet the project objectives. | 8-44
- The EIR provides no evidence that a smaller development on the site that would ↓ 8-45

reduce some or all of the project’s significant unavoidable impacts to a less-than-significant level would not be feasible. Therefore, under CEQA, given the significant unavoidable impacts of the proposed project, such an alternative would be required to be adopted by the City.

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cont.

**Recirculation Requirements**

CEQA contains the following guidance regarding recirculation of a DEIR:

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043).

Based on the deficiencies in the DEIR identified in this letter, some or all of the above criteria are met. Specifically, the air quality and traffic analyses appear to understate the project’s impacts by about 33%. Further, the jobs/housing and growth analyses appear to be substantively flawed. Additionally, the project water demand and objectives/alternatives discussions are inadequate. Individually and in total, these deficiencies deprive the public and decision-makers of meaningful information needed for informed decision-making. Therefore, the DEIR must be recirculated.

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**Conclusions**

As described above, the DEIR fails to meet basic CEQA requirements for project description, impacts analyses, and alternatives analyses. The apparent underestimation of project employment generation in the traffic analyses results in both the traffic and air quality analyses being fatally flawed. It is my professional opinion that the DEIR should be revised to correct the deficiencies identified in this letter and re-circulated for public and agency review. Please feel free to contact me at (510) 849-2354 if you have any questions regarding this letter.

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8-46  
cont.

Sincerely,



Richard Grassetto  
Principal  
Grassetto Environmental Consulting

For:  
Redwood City Neighbors United  
Committee for Green Foothills  
Citizens Committee to Complete the Refuge  
Sierra Club, Loma Prieta Chapter  
Lee Callister, Redwood City resident  
Jim Gernand, Redwood City resident  
Alice Kaufman, Redwood City resident  
Kris Johnson, Redwood City resident  
Janet Larson, member Woodside-Atherton Garden Club  
Dan Ponti, Redwood City resident  
Beverly Purrington, Redwood City resident  
Gail Raabe, Redwood City resident

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**Letter 8**      **Grassetti Environmental Consulting**  
**Response**     **March 8, 2019**

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8-1                      This comment reflects the commenter’s view on how an EIR should be structured. The Draft EIR did not use the CEQA Guidelines Appendix G Checklist as thresholds for determining significance, but did use them as a guide for discussing potential impacts. The structure of the Draft EIR followed standard industry practice, and while the commenter may have an opinion as to how those practices should be altered, the CEQA Guidelines allow discretion as to how Lead Agencies structure CEQA documents. In this case, the City chose to present the analysis using the structure that was presented in the Draft EIR. The comment makes no reference as to any specific deficiencies that resulted from this approach, so we can only surmise that the comment only presents the commenter’s opinion on this matter. As such, this comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.

As for the commenter’s assertion that the Draft EIR used an “old” CEQA checklist that excluded analysis of VMT, the EIR followed the checklist questions that were in effect at the time of publication of the Project’s Notice of Preparation (NOP), which predated the release of the most current CEQA checklist to which the commenter is referring. Further, the statewide requirement to use VMT as the sole metric for transportation impacts does not go into effect until July 1, 2020. Until that time, Lead Agencies are granted discretion as to whether or not to implement the new metric. Therefore, the City’s use of the CEQA checklist questions contained in the Draft EIR was proper and in alignment with the requirements of CEQA. The Draft EIR acknowledges (see page 4.14-31), that while there was a memorandum for possible models and tools that could be used to establish VMT thresholds, this had not yet been established by the City, and so the provided VMT discussion was included in the Draft EIR for informational purposes. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.

See Master Response 1 in Chapter 5 of this Final EIR, which discusses VMT background relative to the Draft EIR analysis in detail. Also see Chapter 2 of this document for the comparative analysis (*Transportation/Traffic*) of the informational VMT in the Draft EIR and the CEQA-level VMT for the Revised Project.

8-2                      The 4.1 *Aesthetics* and 4.3 *Biological Resources* sections of the Draft EIR contained some older analysis of the construction of Blomquist Bridge that was a holdover from earlier analysis that the City conducted during its analysis of the

now-abandoned Inner Harbor Specific Plan. The construction of Blomquist Bridge is not a part of the proposed Project, and neither the bridge nor the proposed Project are reliant upon one another for completion. Analysis relating to the bridge in the aforementioned sections of the Draft EIR will be stricken from the Final EIR, including Mitigation Measures BIO 1a, BIO-1b, BIO-2a, BIO-2b and BIO-2c that are solely triggered by construction or operations in or adjacent to Redwood Creek and therefore no longer required. See Chapter 4 of this Final EIR, which lays out revisions to the Draft EIR. The removal of this information does not alter the conclusions reached in the Draft EIR concerning the Project's impacts.

- 8-3 Specific quantities of fill required to adjust the site's elevation are provided on page 3-27 of the Draft EIR.
- 8-4 Refer to Master Response 1 in Chapter 5 of this Final EIR, which provides additional clarification on the Project's employment density.
- 8-5 As described beginning on page 4-4 of the Draft EIR, the cumulative impact analysis used a blended approach to account for cumulative projects, including Association of Bay Area Governments (ABAG) population and employment projections for 2040, data from the City/County Association of Governments of San Mateo County (C/CAG), the City's General Plan buildout projections (see Draft EIR page 4.14.7), and applicable regional transportation plans. This information was supplemented with the active projects list presented in Table 4.0-1 of the Draft EIR. Based on each of these inputs, the cumulative analysis most likely overestimated cumulative effects, and thus presented a conservative worst-case scenario. Since the comment does not list any specific project/projects that were not included in the analysis, there is no basis to find that the cumulative analysis was insufficient. Therefore, this comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR.
- 8-6 With respect to the cumulative impact analysis approach, see the response to comment 8-5, above. With respect to the inclusion of commercial space in the cumulative approach, as addressed above, and in the Draft EIR on pages 4-4 through 4-7, non-residential development square footage is considered.
- 8-7 Refer to Chapter 6 of the Draft EIR, *Impact Overview and Growth Inducement*, which addresses growth inducement impacts of the Project. Also see Master Response 3 in Chapter 5 of this Final EIR, which addresses that even with a higher employee population density applied, the City's jobs/housing-balance would not necessarily increase. As stated there, ABAG projects a higher rate of household growth than employment growth in the City through 2030. With the Revised Project's lower employment generation than the City, there would be a reduced number of employees, resulting in a reduced demand for housing than that considered for the Draft EIR Project.

8-8

The population discussion in the Draft EIR focused primarily on increased employment rather than overall City population growth because it cannot be known with certainty how many Project employees would choose to establish households in the City. Given the geography of the Project site and the region in general, Project employees would have any number of options available to them with respect to where they might choose to live. The commenter is referred to Impact PSR-3 on page 4.12-9 of the Draft EIR for an overview of the population impacts on public services.

To quantify the potential number of new employees that would establish new households with dependents in Redwood City would be highly speculative. Primary factors into how many new persons might be added to the City by the Project would require an understanding of the choices that new employees might make about relocating their existing households to Redwood City, solely as a result of becoming newly employed by the proposed Project, as well as the make-up of the new employee's households since, for example, some portion of the new employees might share a single household with one or more other Project employees, some may or may not have dependents, etc. Any number of the new employees may also move into existing homes being sold or vacated, and potentially replace existing persons that move out of the area, or into newly constructed homes. Such choices cannot be known with reasonable certainty. As mentioned in the *Approach to the Analysis* discussion on page 4.11-6 of the Draft EIR, the Project will directly result in new employees, but the analysis does not make any projection about where new employees will live or if there will be any change in their residency due to new employment at the Project site. The analysis does not (nor should it) assume that new workers would necessarily elect to relocate to Redwood City from outside the City, San Mateo County or the Bay Area specifically as a result of the new job. However, it is reasonable that some of the new employees already have homes in Redwood City.

In addition, please refer to Section 4.0.4, *Cumulative Analysis*, which identifies that the joint Santa Clara Valley Transportation Authority (VTA) and City/County Association of Governments of San Mateo County (C/CAG) travel demand model (VTA-C/CAG model) forecasts the future traffic that will come from projected growth. This section also addresses the Draft EIR's incorporation of growth forecasted through the Redwood City General Plan, City General Plan and Plan Bay Area 2040.

In short, a cut-and-dry assumption that everyone employed by the Project would relocate to Redwood City and that each of those employees would bring with them a household with a set number of persons cannot be supported. As such, the analysis focused on actual employment. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR.



- 8-9 Refer to Master Response 3 in Chapter 5 of this Final EIR for a discussion of employment and population growth associated with the Project. Further, the comment does not consider the fact that a substantial number of employees are projected for the Project site under existing zoning and General Plan assumptions (1,911 employees are projected for the site under the existing General Plan land use designations), and that the true population growth associated with the Project beyond planned projections is actually the *difference* between what is already projected and what is now proposed. By excluding that detail, the commenter is substantially exaggerating the actual employment growth associated with the Project.
- 8-10 Refer to Master Response 1 in Chapter 5 of this Final EIR, which clarifies the City’s approach for calculating Project employment density, and the substantial evidence supporting that approach.
- 8-11 Refer to Section 4.0.4, *Cumulative Analysis*, which identifies the Draft EIR’s approach to the cumulative context. Also see Master Response 3 in Chapter 5 of this Final EIR, which addresses the treatment of job-housing-balance and its applicability to the requirements of CEQA.
- 8-12 With respect to the commenters request for clarification regarding flow of employees addressed in the EIR, refer to Draft EIR Section 4.11 *Population and Housing*. Specifically, page 4.11-10 and 11 provide separate descriptions of possible employment flows between 2018 and 2020 based on Plan Bay Area data, as cited.
- 8-13 With respect to the commenters request for clarification regarding employment growth refer to Draft EIR Section 4.11 *Population and Housing*. Specifically, page 4.11-12 provides detailed references, which Table 4.11-3 reflects.
- 8-14 Refer to Master Response 3 in Chapter 5 of this Final EIR, which clarifies the Draft EIR’s consideration of jobs/housing balance. In particular, see the subsection entitled *Project Generated Housing Demand and Local Supply*, which provides information on the likely housing demand created by the Project. Further, and as stated previously, the comment does not consider the fact that a substantial number of employees are projected for the Project site under existing zoning and General Plan assumptions (1,911 employees are projected for the site under existing General Plan land use designations), and that the true population growth associated with the Project beyond planned projections is actually the *difference* between what is already provided for in the General Plan and what is now proposed. By excluding that detail, the commenter is substantially exaggerating the actual employment growth and potential housing demands associated with the Project.

- 8-15 Refer to Master Response 1 in Chapter 5 of this Final EIR, which clarifies the Draft EIR Project's and Revised Project's employment density, and also refer Master Response 3, which then further clarifies the resultant housing demand and jobs/housing balance.
- 8-16 Refer to Master Response 3 in Chapter 5 of this Final EIR, which addresses the Draft EIR's consideration of jobs/housing balance.
- 8-17 Refer to Master Response 3 in Chapter 5 of this Final EIR, which addresses the Draft EIR's consideration of jobs/housing balance. In addition, Section 4.11.7 Jobs/Housing Balance on page 4.11-11 is revised as follows to remove unnecessary description and clarify possible housing demand in response to comments:

Therefore, the new housing demand that may result from the new Project employees wanting to live in Redwood City (2,043 units) or elsewhere throughout the County could be addressed in part by the anticipated housing units expected to be developed by 2040.

This modification does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.

- 8-18 The estimated weekday daily VMT per employee stated in the Draft EIR was 25.9, provided in the Draft EIR for informational purposes. VMT is based on regional travel demand forecasting models and accounts for total daily trips per employee. It is not an indicator of commute distance, as implied by the commenter, since daily VMT includes not only trips to and from a place of employment, but also all other travel throughout the day, such as travel to lunch, external meetings, conducting household business, and other errands. As such, the commenter's assertion that each employee would have an average 26-mile commute to and from the Project site is neither accurate nor supported by evidence. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required. See Master Response 1 in Chapter 5 of this document. Also see Chapter 2 of this document for the comparative analysis (*Transportation/Traffic*) of the informational VMT in the Draft EIR and a CEQA-level VMT for the Revised Project.
- 8-19 With respect to the Draft EIR's approach to cumulative impacts, refer to response to comment 8-5, above. CEQA Guidelines Section 15130 provides that cumulative impacts should be evaluated within the context of ongoing or reasonably foreseeable actions that could cumulatively have impacts on the environment. While a General Plan can provide useful guidance concerning what *could* happen under full General Plan buildout (a condition that is rarely, if ever,

fully realized during the life of most General Plans), it is not an indicator of what is actually reasonable and foreseeable, since the level of development that will actually occur in a jurisdiction is not a function of what is *allowed* under the General Plan, but is rather a function of the development that is actually proposed and constructed. Therefore, the Cumulative Context Projects List, presented in Table 4.0-1 is a much more accurate indicator of projects that are reasonable and foreseeable, since the listed projects are those for which an active application is pending, are under construction, or in the case of public projects, are funded and/or undergoing environmental analysis. The “2 million sq. ft. of additional new office space” referred to by the commenter and provided for in the General Plan is merely a possibility, assuming that applicants come forward with proposals to develop those spaces. Until then, that level of development is not truly foreseeable, and it can’t be reasonably counted on as certain to occur. Therefore, the list of “active” projects presented in Table 4.0-1 is a much more accurate representation of the level of development that is likely to occur in the foreseeable future.

The commenter is also referred to Master Response 3 in Chapter 5 of this Final EIR, which further addresses the Draft EIR’s consideration of jobs/housing balance.

- 8-20 Please refer to Master Response 3, which provides information on jobs/housing balance, and explains how reaching conclusions about how and where people will live in such a diverse region as the Bay Area is a highly speculative endeavor that is not within the purview of CEQA. The commenter is also referred to the following sections of the Draft EIR, which analyze each of the subjects listed in this comment: Section 4.2 *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions and Energy*
- 8-21 As the commenter notes, page 4.11-3 provides information on housing affordability. As cited in this section, information is provided by the Regional Housing Needs Allocation (RHNA) process, by which the City has demonstrated capacity to meet its required allocation. For additional information, please see Master Response 3 in Chapter 5 of this Final EIR, which addresses the Draft EIR’s consideration of jobs/housing balance. As stated in the master response, regional and local governments may use jobs/housing balance and/or housing affordability as a planning tool to weigh particular policy outcomes, it does not necessarily imply a physical change to the environment or relate to any recognized criteria under CEQA. Further, it is not feasible to analyze how a specific project will impact housing affordability levels in Redwood City or the region. As such, this comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR.

- 8-22 As described in the EIR, and given the respective distances of the Project site from existing solar collectors, public open space, residential development, and sensitive natural habitat, a qualitative assessment supports that the Project would not result in any significant impacts with respect to shadows and shading. Further, the Project would be required to adhere to the City's development standards and regulations, and final design of the Project (including any proposed public open spaces associated with the Project) would be subject to a Planned Community Permit approval to ensure consistency with development standards and guidelines, including the requirements for a shade and shadow study. No further analysis is required.
- 8-23 As indicated on page 4.1-17 of the Draft EIR, the Project would introduce new sources of light and glare in the area, but those sources would be generally consistent with what is already present in the area; namely a busy commercial and industrial area that is bisected by a major regional freeway. Given the existing setting, the introduction of Project-related structures would not introduce new light and glare sources that would be out of character with the surrounding area. The impact would be neither significant nor adverse. No further analysis is required.
- 8-24 Figure 4.3-1 of the Draft EIR has been revised to address this comment. It should be noted that the referred-to tidal marsh area is offsite from the Project site and is separated from the site by a major arterial roadway. Implementation of the Project would have no effect on this resource. The modification of Figure 4.3-1 does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.
- 8-25 In response to this comment, the fourth and fifth paragraphs of Impact BIO-3 on page 4.3-33 of the Draft EIR have been revised as shown below. The revision includes requirements for implementation of a mitigation measure that has been designed in accordance with "bird-safe" building design requirements prescribed for other projects in the City and in place in various jurisdictions in the Bay Area. The measures have been demonstrated to result in significant reductions in avian mortality caused by collisions with buildings.<sup>1</sup>

Impact BIO-3 starting on page 4.3-32 of the Draft EIR is revised as follows:

**Impact BIO-3: The Project could substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors,**

<sup>1</sup> San Francisco Planning Department. 2011. Standards for Bird-Safe Buildings. Adopted July 14, 2011. Available at: [http://default.sfplanning.org/publications\\_reports/bird\\_safe\\_bldgs/Standards%20for%20Bird%20Safe%20Building%20-%202011-30-11.pdf](http://default.sfplanning.org/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Building%20-%202011-30-11.pdf). Accessed August 28, 2019.

**or impede the use of native wildlife nursery sites (Criterion d). (Less than Significant)**

As discussed above, the Project site is located in a regionally-sensitive natural area, with extensive salt marsh, tidal flat, and salt pond habitats in the immediate vicinity of its commercial and industrial activities.

Therefore, there is a low potential for the Project to impact resident and migratory fish and wildlife corridors or impede the use of native wildlife nursery sites.

**Avian Collisions with Buildings and Night Lighting**

The Project site vicinity is located within the Pacific Flyway along the western shoreline of San Francisco Bay. While exact migratory corridors through the area are unknown and vary by species, birds typically follow coastlines, rivers, and mountain ranges in their migratory passages from wintering to breeding grounds and back again. The Project site could provide foraging and roosting habitat for migratory species. Although development in the vicinity of proposed Project is currently illuminated during the nighttime and existing commercial and industrial developments and Highway 101 have increased ambient lighting over the recent years, development proposed under the proposed Project would increase ambient light and glare levels associated with the potential use of reflective building materials, street light fixtures, nighttime lighting of commercial identification signs and logos, and increased vehicle and transit use.

~~Development of the Project may increase the risk of bird collisions over that posed by existing structures. For new buildings, reflective building façades that are generally located in a clear flight path from water features can create hazards for birds. Other potential feature-related hazards new development can pose to birds include glass courtyards, transparent building corners, or clear glass walls on rooftops or balconies. When considering the Project site location along a known migratory route, proximity to the bay, the large area of exterior glass surfaces, and the presence of frequent shoreline fog which can adversely affect avian navigational awareness, the Harbor View Project development could increase the risk of avian collisions. If the buildings' exterior surfaces were to be reflective and not incorporate elements to avoid or minimize avian collisions, it is foreseeable that an unknown number of songbirds or waterbirds could collide with new structures and could result in injury or fatality. Accordingly, the following mitigations measures are required and will reduce impacts:~~

~~Due to recent changes to the federal MBTA, the incidental "take" of migratory bird species is not prohibited by the MBTA or Fish and Game Code (USDOJ, 2017; USFWS, 2018). Because the take of migratory~~

~~birds is not prohibited by CDFW or by the MBTA based on federal guidance, potential impacts to avian species from collision with new buildings would be less than significant with no mitigation required.~~

~~Nonetheless, it is recommended that the Project applicant incorporate bird safe measures into the building design that would reduce the potential for avian collisions. These include, but not limited to, the use of exterior glass treatments (use of non-reflective glass through tinting, glazing and/or fritting that reduces transmission of light out of the building), as well as exterior façade and lighting treatments.~~

~~**Mitigation: None Required.**~~

**Mitigation Measure BIO-3a: Bird-Safe Building Requirements.**

To the extent feasible, bird-safe glazing treatments (e.g., fritting, frosting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing, or ultraviolet patterns visible to birds) shall be used to reduce the extent of untreated glass to less than 10 percent on each of the Project buildings.

**Mitigation Measure BIO-3b: Lighting Requirements.**

The Project shall implement Bird-Safe lighting design and operations, to include the following: 1) The built environment should be designed to minimize light pollution including: light trespass, over-illumination, glare, light clutter, and skyglow while using bird-friendly lighting colors when possible; 2) Unneeded interior and exterior lighting shall be turned off from dusk to dawn during migration periods, defined here as February 15 through May 31 and August 15 through November 30; 3) At all times, rooms where interior lighting is used at night should have window coverings that adequately block light transmission, and motion sensors or controls to extinguish lights in unoccupied spaces.

**Significance after Mitigation: Less than Significant**

These detailed mitigation measures do not differ considerably from the general mitigation recommendations they replace from the Draft EIR. Therefore, introduction of these measures does not trigger the recirculation requirements noted in CEQA Guidelines Section 15088.5, nor do they alter the conclusions of the Draft EIR.

8-26

Refer to Master Response 1 in Chapter 5 of this Final EIR. Also see Chapter 2 of this document for the comparative analysis (*Transportation/Traffic*) of the informational VMT in the Draft EIR and a CEQA-level VMT for the Revised Project.

- 8-27 As stated on page 4.14-31 of the Draft EIR, the VMT analysis is provided for informational purposes only. Refer to Master Response 1 in Chapter 5 of this Final EIR. Also see Chapter 2 of this document for the comparative analysis (*Transportation/Traffic*) of the informational VMT in the Draft EIR and a CEQA-level VMT for the Revised Project.
- 8-28 Refer to response to comment 8-27 above.
- 8-29 Project and cumulative impacts to mainline segments of US 101, and associated mitigation measures, are addressed in Impact TRANS-12, Impact TRANS-14, and Impact TRANS-28 in the Draft EIR. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further analysis is required.
- 8-30 Refer to response to comment 5-3. Most of the Project traffic would be added to intersections closest to the site and the amount of potential traffic diversion would decrease as distance to the site increases. Although some Project generated traffic will likely use Woodside Road and Farm Hill Boulevard south/west of El Camino Real, it is unlikely to cause a significant impact at intersections further from the Project site. In consultation with Redwood City staff and preliminary outputs from the C/CAG and City travel demand models during the EIR scoping phase, additional study intersections along Farm Hill Boulevard and Woodside Road were determined to not be warranted, based on the Project's level of contribution to traffic at those intersections. Further, as discussed in the Draft EIR, if traffic congestion increases, discretionary trips would tend to move to other time periods, further dampening the effect of potential traffic diversions. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further analysis is required.
- 8-31 Refer to Master Response 1 in Chapter 5 of this Final EIR. An updated air quality emissions analysis has been provided for informational purposes.
- 8-32 As shown in Table 4.6-8 of the Draft EIR, the GHG analysis for the EIR assumed a service population of 4,579. As for the second portion of this comment, traffic models calculate levels of delay in response to increased traffic. As such, the analysis considered delays associated with future traffic volumes. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further analysis is required.
- 8-33 With respect to the specific quantities of fill required to adjust the site's elevation, these values are provided on page 3-27 of the Draft EIR. With respect to construction related emissions, the Draft EIR considered grading and other construction related truck trips in its analysis of Project-related emissions. Detailed information concerning trips related to import and export of fill and demolition materials is provided in Appendix C of the Draft EIR. Lastly,

transportation-related impacts associated with construction are addressed in Impact TRANS-21. As described in Mitigation Measure TRANS-21, the Project would be required to develop a construction management plan that is approved by the City prior to issuance of a building permit. This construction management plan would address the number of truck trips per day and duration and truck routes that would be used, among other things. These project details were also considered in the Air Quality analysis in the Draft EIR. No further analysis is required.

- 8-34 Onsite infrastructure and development stability is addressed in Section 4.5, *Geology and Soil* of the Draft EIR. While a review of impacts to offsite infrastructure from liquefaction is outside the scope of this EIR, and of CEQA generally, it can be assumed that any recent construction would be required to comply with mandated building codes. Similarly, any construction of new onsite infrastructure would also be required to abide by those same requirements. Ultimately, effects on future Project users due to existing geological, soils, or seismic conditions that would be not exacerbated by the proposed Project are outside the scope of CEQA [see *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4<sup>th</sup> 369.]. While of interest to planners and service providers, CEQA is not the appropriate forum to address these types of topics. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.
- 8-35 Please see Master Response 2 in Chapter 5 of this Final EIR, which addresses the Draft EIR's consideration of sea level rise. The commenter is also referred to the response to comment 5-4, which provides additional information concerning the site's drainage to offsite areas.
- 8-36 Construction of the Blomquist Bridge, if it were to occur, would be required to comply with applicable regulations concerning water quality and flooding. Specifically, the bridge's design would not be allowed to obstruct or exacerbate flood flows. With respect to water quality effects, the commenter is referred to Section 4.8, *Hydrology and Water Quality* of the Draft EIR, which analyzed the topics raised in this comment. Section 4.8.2 outlines the various regulations that all aspects of the Project would be required to comply with to avoid impacts to flooding and water quality.
- 8-37 The existing water demand presented in the Draft EIR drew from an older source of information that described the site's water demand when uses associated with building materials operations remaining along Blomquist Street were still in operation. As presented in the Draft EIR, a WSA was conducted but not approved for the 2015 Harbor View Project (included as Appendix I to the 2015 *Inner Harbor Specific Plan and Harbor View Projects Draft EIR*). The 2015



WSA also assumed limited development on the Project site and determined that the water demand of the Project would not exceed existing water supplies, factoring in the Redwood City's 2015 Urban Water Management Plan. The impact would be less than significant.

Since preparation of the Draft EIR, the Engineering Division of the City's Public Works Services Department prepared a Final WSA for the Revised Project and that reflects no existing demand from the site (**Appendix C** to this document). The WSA confirms that the Revised Project development is included in the City's updated 2020 UWMP. Moreover, the Final WSA shows that Redwood City would have sufficient supply for the Revised Project in normal and dry years. The impact would remain less than significant, same as determined in the Draft EIR. See the comparative analysis of *Utilities and Service Systems* in Chapter 2 of this Final EIR, which also summarizes in a Table 4.13-1 the Revised Project's water demand from the Final WSA.

Although the information in this Final EIR thoroughly addresses the WSA reflecting accurate existing conditions and the Project Applicant's Revised Project, the discussion of Impact UTIL-2 starting on page 4.13-13 of the Draft EIR is clarified as follows:

**Impact UTIL-2: The water demand generated by the Project would not exceed water supplies available from existing entitlements and resources or require or result in the construction of new water treatment facilities or expansion of existing facilities (Criteria b and d). (Less than Significant)**

#### **Demand / Supply**

~~Based on the 2018 report prepared by BKF Engineers, the~~ The existing water demand (domestic and irrigation) for the site is ~~27,506 gpd~~ currently minimal, and is restricted to uses associated with the existing building materials operations along Blomquist Street. Under Project conditions, with the connection to recycled water, the proposed water demand would be approximately 33,263 gpd of potable water and 154,339 gpd of recycled water, for a total water demand of 187,602 gpd. Assuming that potable water consumption on the site is currently near zero, ~~¶~~ this would increase the potable water demand by approximately ~~5,757~~ 33,263 gpd. The Project will also be required to meet the required fire flow velocities and flow durations pursuant to current fire code (BKF Engineers, 2018) and pursuant to Redwood City Engineering Standards. Further, the City is not currently constrained in supplying additional recycled water supplies to customers (Redwood City, 2015b).

A WSA was conducted but not approved for the 2015 Harbor View Project (included as Appendix I to the 2015 *Inner Harbor Specific Plan*

*and Harbor View Projects Draft EIR*). The WSA was based on the site's then-existing potable water demand of 27,506 gpd, and found that the net increase in demand with the Inner Harbor Specific Plan Project would be a net increase of 5,830 gpd (compared to 5,757 gpd with the currently proposed Project).

The City's Public Works Services Department prepared a Final WSA for the proposed development, which is included in the appendix.

The above modification to the Draft EIR and the comment do not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, or add any new significant information.

- 8-38 The CEQA Guidelines provide that the statement of project objectives should include the underlying purpose of the project, and may also discuss the project benefits [CEQA Guidelines Section 15124(b)]. The basic objectives presented in the Draft EIR fulfill those requirements by stating the project's basic purpose (Objective 1: Develop a lively working environment with office uses within the Inner Harbor to promote innovation and creativity), and includes objectives that relate to the manner in which the Project applicant would like to develop its Project, and also includes objectives related to Project benefits. Each of these objectives meet the criteria set forth in the CEQA Guidelines. In general, the comment states the commenter's opinion on the Project's merits and how the Project should or should not be developed, and does not present information on environmental issues that have not been adequately evaluated in the Draft EIR.
- 8-39 As stated on page 5-14 of the Draft EIR, this alternatives "reflects development that could likely occur on the Project site through the natural course of growth under the existing Industrial – Restricted (IR) zoning designation, to the extent that the growth is *within allowances currently permitted by the General Plan* [emphasis added]. 22.78 acres of the 27.08-acre Project site are designated Industrial – Light (LI), of which the Industrial – Restricted (IR) zoning designation is a part. The IR zoning provides for, among other uses, R&D and ancillary uses, which was the basis for this alternative. As such, the alternative would not require a General Plan Amendment.
- 8-40 Under CEQA, alternatives should consider variations to the Project or its location that "would avoid or substantially lessen any of the significant effects of the project" [CEQA Guidelines Section 15126.6(a)]. The Reduced Buildout/Building Height alternative accomplishes that objective, in that it substantially reduces vehicle trips and their associated effects. Nevertheless, the impact of implementing the alternative would remain Significant and Unavoidable for traffic impacts. As stated in Chapter 5 of the Draft EIR, *Alternatives*, all of the Project alternatives, including both No Project alternatives, would result in Significant and Unavoidable traffic impacts. Therefore, only the implementation

of a project that is substantially less intensive than that already considered and allowed under the General Plan would successfully reduce all impacts to less-than-significant levels. This is not a reasonable expectation when one considers that a project developed on the site “by right” and in full compliance with the General Plan would still result in Significant and Unavoidable effects. Ultimately, the commenter is expressing his opinion on what should be considered for the site, and the comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR.

- 8-41 Refer to Master Response 4 in Chapter 5 of the Final EIR. This comment conveys the opinion of the commenter as to a desired variation on an existing alternative and how the Project should be developed, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.
- 8-42 The various No Project alternatives considered the likely effects of what could happen if the proposed Project were not implemented and some future project was proposed that would conform to the site’s existing land use and zoning designations. The No Project Existing General Plan and No Project Existing Zoning alternatives presented in the Draft EIR assumed the maximum development allowed under the site’s existing land use and zoning. This was done to ensure a disclosure of the worst-case effects that could be experienced under each scenario. This worst-case level of analysis is consistent with the analysis conducted for the Draft EIR Project, the Applicant’s Revised Project, and all of the various alternatives. It follows that any level of development conducted at lesser intensities under any of the alternative scenarios should result in lower levels of environmental effects. However, the City cannot speculate as to the types and intensities of development that might be proposed under the existing land use and zoning designations, since such a proposal has not been presented. It is possible that a lower intensity project could be proposed at some future time, but it is equally possible that a project of maximum intensity could also be proposed. Therefore, an evaluation of the most intensive and worst-case scenario was indicated, as such an evaluation most clearly presents the level of effects that could be experienced if the site were to be fully developed under its existing land use and zoning designations. Also see Chapter 3, *Description and Analysis of the No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative*, of this Final EIR.
- 8-43 Much of the City is built out, and there is a general lack of feasible sites within the City for a project similar to that analyzed in the Draft EIR. Ultimately, development of 1.18 million square feet of commercial office use at any location in or near Redwood City would result in many, if not all, of the same effects as

the proposed Project, even in a suitable location were present and was available to the project sponsor. This fact was disclosed in the Draft EIR. Therefore, this comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.

- 8-44 The Project objectives are clear that the purpose of the proposed Project is to develop office uses. See Objective 1, where it is stated: “Develop a lively working environment with *office uses* [emphasis added] within the Inner Harbor to promote innovation and creativity.” Therefore, the Reduced Buildout Alternative meets those objectives.
- 8-45 Refer to the response to comment 8-40. As stated there, even the No Project, Existing Land Use alternative would result in Significant and Unavoidable impacts. That alternative is the practical expectation of what could occur on the site if the proposed Project is not approved. It would appear that the commenter is suggesting that the City can only approve a project that is substantially less than that which is currently allowed under the City’s General Plan. In fact, Lead Agencies are provided with wide discretion as to the projects they approve, even if those projects could result in Significant and Unavoidable impacts. Such a determination of benefits vs. impacts, and, ultimately, of feasibility, is best left to the findings that support the Lead Agency’s decision, as supported by a Statement of Overriding Considerations, when applicable. Ultimately, the commenter’s objections to the alternatives that were selected for analysis are based on the commenter’s opinion as to how the Project should be developed. The comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.
- 8-46 As has been laid out in each of the preceding responses, the commenter has raised numerous objections to the analysis contained within the Draft EIR, and all of those objections have been determined to not have presented any new information concerning the Project’s likely effects that have not already been adequately addressed in the Draft EIR. Therefore, the commenter’s assertion that the Draft EIR is fundamentally flawed and must be recirculated is not supported.



February 11, 2019

Mayor Ian Bain  
City of Redwood City, City Council  
1017 Middlefield Road  
Redwood City, CA 94063

RE: Harbor View  
Comments to Draft EIR

Dear Mayor Bain and Council Members,

Prior to Jay Paul’s acquisition of the Harbor View site, Malibu Grand Prix closed its doors unable to sustain its business operations. During 2013-2014, Jay Paul acquired the Malibu parcel and other adjacent parcels with the intent of developing a tech office campus similar to Pacific Shores Center, located at the end of Seaport Blvd, which we developed in 2001.

After our acquisition of the Project site, the City determined our re-zoning effort should proceed as part of the Inner Harbor Specific Plan. The IHSP was intended to present a vision and specific regulations to improve the public and private realms along Redwood City’s waterfront area (Redwood Creek/Harbor Center), as directed by the Redwood City General Plan. This combined approach was intended to assure a comprehensive study and disclosure of all potential impacts throughout the entire 100 acre Inner Harbor area. The IHSP included a variety of uses and properties, of which the 27 acre Harbor View site represented approximately 25%.

A draft Environmental Impact Report for the Inner Harbor Specific Plan was prepared and released in October 2015. For reasons unrelated to our project, by mid-2016 it became clear the Inner Harbor Specific Plan would not advance as envisioned. The City suspended all future work on the plan and EIR and encouraged all property owners seeking redevelopment of their parcels to submit independent project applications as the future of the plan was uncertain.

In February 2017, after a failed earlier planning commission request, we requested Council consider initiation of a General Plan Amendment study to change the existing zoning at the Harbor View site to Commercial Park (CP), similar to the existing zoning for much of the Seaport area and which, if approved, would allow for a 10% smaller project than originally proposed under the Inner Harbor Specific Plan.

9-1

Our request was considered and approved by Council in July of 2017, preparation of a new EIR commenced and the Draft EIR we are now considering published in January 2019.

**Summary of DEIR Significant Impact Findings**

In summary, the Harbor View Draft EIR identifies significant impacts in two areas of environmental topics studied, Air Quality and Transportation and Traffic. No other environmental topics studied identified unmitigated or significant impacts.

- The sole Air Quality impact was not a result of emissions generated by the Project but because the Project would amend the General Plan and therefore would not comply with the adopted Air Quality Plan (though uses at the site were generally consistent with the plan).
- The traffic and transportation impacts, though significant, were similar to the significant impacts that would occur if the site was developed under either of the No Project alternatives eg pursuant to the General Plan or existing zoning. In other words, development of a project per permitted use and density would also result in significant traffic impacts. Further, it’s unrealistic to expect that no redevelopment of the site would ever occur, either pursuant to existing permitted land uses or pursuant to changes to those existing uses.

**4.2.6 Air Quality**

As mentioned above, Section 4.2.6. Cumulative Impacts AIR-1.CU concludes development of the Project, combined with cumulative development citywide, would result in significant cumulative air quality impacts (Criteria a and c). Criteria (a) considers a Project’s consistency with the Clean Air Plan while Criteria (c) considers a Project’s contribution to Cumulative Effects of net increases of any criteria pollutant for which the project region is a non-attainment under an applicable federal or state ambient air quality standard. While the DEIR concludes that the Project does create a significant impact with respect to consistency with the Clean Air Plan, this impact is a result of the requested General Plan amendment rather than any specific air quality issues at the site. Further, the DEIR concludes that the Project does not contribute to cumulative impacts for criteria air pollutants:

**Consistency with Clean Air Plan.** Page 4.2-29 of the DEIR concludes that the “Redwood City General Plan’s development assumptions for the Redwood Creek/Harbor Center area are generally consistent with the Project” and “while similar in overall development assumed, the Project requires amendments to the General Plan and zoning to accommodate maximum theoretical buildout of the Project, and is therefore is not considered to be fully consistent with the assumptions in the 2017 Clean Air Plan . . . therefore the development as proposed under the Project would be conservatively considered to lead to a cumulatively significant air quality impact.”



9-1  
cont.

**Project Contribution to Cumulative Effects.** The DEIR concludes that the Project level thresholds for criteria air pollutants “would not exceed project-level-significant thresholds for construction or operational criteria pollutant emissions with the implementation of Mitigation Measures AIR 1A, AIR 1B, and AIR 1C to reduce construction emissions of NOx to less than significant. Therefore the contribution of the Project to the cumulative, regional air quality impacts related to criteria pollutants would not be considerable, and the Project’s contribution to any cumulative air quality impacts would be less than significant.” The DEIR also states “the Project would not contribute substantially to cumulative TAC emissions that could affect existing and nearby proposed sensitive land uses. Therefore the Project contribution to any cumulative air quality impacts related to exposure to TAC’s would be less than significant.” In other words, the DEIR concludes that the Project does not contribute significantly to cumulative impacts for criteria air pollutants.

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**4.14 Transportation and Traffic**

As mentioned previously, when considering the traffic impacts of the Project, its important to remember that both No-Project alternatives would generate similar significant transportation and traffic impacts. The DIER, states on page 5-13, “**the same significant . . . transportation and traffic impacts identified with the Project would continue to occur**” under both No-Project alternatives. In other words, a project developed by right under the existing General Plan or zoning would still result in similar significant traffic impacts. Further, its unrealistic to expect that the site would never be developed at any point in time under any development scenario, therefore significant traffic impacts will always occur.

**Additional Considerations and Discussion**

**4.14.9 Transportation Demand Management**

The DEIR does not fully consider the significant reduction in traffic that would occur through the implementation of a strong and effective Transportation Demand Management program. The proposed TDM plan included as part of the Project application includes strategies resulting in 2076 trip measure credits which is greater than the estimated peak hour trip generation for the project of 1,282 trips. (page 4.14-85) As presented in Table 4.14-24, its estimated that the Project’s TDM plan would result in an 11% reduction in trips eg 1,176 peak hour trips and by extension, 7,200 daily trips. The below table presents the Project’s trip generation with TDM as compared to trip generation calculated by the DEIR for the two No-Project Alternatives studied:

9-2

	Proposed Project w/TDM	Existing General Plan	Existing Zoning
Estimated Peak Hour	1,116 AM/1,176 PM	783 AM/830 PM	761 AM/716 PM

AM/PM Trips			
Daily Trip Generation	7,000 Daily	6,047 Daily	5,601 Daily

While the trip generation rates with basic TDM under the Project are higher, its important to point out that the TDM strategies analyzed do not take into consideration significant trip reductions regularly achieved with highly effective and innovative TDM measures not included in the methodology, such as comprehensive tenant transportation systems (eg private regional commuter buses/shuttles). Jay Paul has a reputation of attracting top tier technology tenants which regularly use private shuttle/busing services to efficiently transport their employees to and from the campus. Further, these types of tenants employ other strategies (high quality food service and other services such as onsite health and wellness programs) that reduce the number of trips to and from the campus throughout the work day. It has been our experience that these types of tenants are able to reduce daily trips by as much as 50%. Further, Jay Paul has extensive experience throughout similar projects in the region of implementing successful TDM programs which are regularly monitored by the municipalities within which they are located. These programs have consistently met prescribed trip reduction goals which typically require 25% overall and 30% peak trip reductions.

9-2  
 cont.

While the above table would indicate the Project would exceed the estimated trips generated under both No Project alternatives, the uses studied under both alternatives would not be able effectively employ similarly effective TDM strategies because of the nature of their operations and types of tenants within those projects. We believe that under typical operating conditions, the Project’s TDM coupled with the types of enhanced measures our typical tenants would employ would result in a similar number of generated trips as compared to the No Project alternatives.

**4.2 Air Quality – Sensitive Receptors**

The On-site Public Amenities Alternative was a response to comments received during scoping of the EIR. The resulting Alternatives analysis considered including uses within the site that would potentially expose sensitive receptors to adverse environmental conditions at the site. Specifically, sports fields and day care were mentioned as possible uses at the site. While we support a public use component at the Project, identified site conditions preclude uses exposing sensitive receptors to adverse environmental conditions and therefore day care and sports facilities are inappropriate at this location. As stated in the DEIR, the California Air Quality Resources Board guidance recommends a minimum buffer of 500 feet from the edge of freeways to sensitive receptors. Further, these uses are not in compliance with the City’s General Plan Policies including:

9-3

- Policy PS 2.1: Consider surrounding land uses when locating sensitive receptors such as schools, hospitals, and residential uses so they are not unreasonably exposed to uses that generate pollutants considered detrimental to human health.



- Policy PS-2.4: avoid placing sensitive uses within 500 feet or other distance deemed to be appropriate based on project specific health risk assessment data-of the Port of Redwood City, related to heavy industrial areas, and any roadways serving Port Uses.

Virtually every area of the site is either within 500 feet of US HWY 101, a roadway serving Port Uses or a heavy industrial use. Further, the DEIR suggests mitigations that while appropriate for indoor uses, fail to adequately mitigate air quality issues associated with the outdoor uses required in day care facilities (75 sf of outdoor area per child per California State Regulation 101238.2) and recreational uses which are considered sensitive due to the greater exposure to ambient air quality conditions because the vigorous exercise associated with some forms of recreation places a high demand on the human respiratory system. (DEIR page 4.1-10).

In addition, the Project site is under a Voluntary Cleanup Agreement (VCA) between Harbor View and the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) and a *Draft Removal Action Workplan* (RAW) dated December 7, 2019 (Path Forward 2018), is pending approval from the DTSC. As specified in the Draft RAW, the Site owner will work with DTSC to develop a recorded Land Use Covenant (LUC) for the Site. This LUC, requested by the DTSC due to the subsurface contaminants, will prohibit certain uses including residential, a first floor day care for children and a public or private school for persons under 18 years of age. For these reasons, both childcare and play fields are not considered appropriate uses at the site. For your reference, we are providing under separate cover a letter from Path Forward, the environmental consultant working with the DTSC on this matter, which further describes the RAW and VCA and addresses the adverse impacts to sensitive receptors.

9-3  
cont.

**4.8 Hydrology and Water Quality – Sea Level Rise**

Given the location of the Project site, sea level rise is a major concern that needs to be addressed. Harbor View has been designed to be self-mitigating for sea level rise with the lowest floor of structures at the site being raised to 14 feet above mean seal level (msl). This increase takes into consideration FEMA requirements to be above the 100-year special flood plain zone (eg 10 feet above msl), City of Redwood City recommendations to increase the elevation by 1 foot above FEMA requirements (eg 11 ft above msl) and an additional 3 feet to account for 3/4 century sea level rise per Bay Conservation and Development Commission (BCDC) guidelines. Therefore with the proposed grading and finished floor elevations which would increase elevations above flood hazard levels in accordance with the minimum standards of Municipal Code requirements and accommodating future sea-level rise increases, the DEIR concludes that the Project would have less than significant impacts on both a Project and cumulative basis.

9-4

**4.11.7 Jobs/Housing Balance**

The DEIR concluded that the housing units anticipated to be added in the future would more than offset the additional housing demand generated by the Project. Impact POP-1.CU concludes that

9-5

the Project, combined with cumulative development in the Project vicinity and citywide would not result in a significant impact on population, housing and employment. Further, in Section 4.11.7 Jobs/Housing Balance, the EIR discusses for informational purposes only the impact of the Project on housing demand and concludes that new housing demand resulting from new Project employees wanting to live in Redwood City (2043 units) or elsewhere throughout the County could be adequately addressed in part by the anticipated housing units expected to be developed by 2040.

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cont.

Recognizing the need for affordable housing, the Project has pledged a contribution of \$12.4 million to the St. Francis Center to be used for the creation of affordable housing units within the community and the Project will work with the City to create an Affordable Housing Plan to immediately deliver affordable units within a new housing project in the City currently being developed by Jay Paul in lieu a cash payment for the Project’s required housing mitigation fee.

**4.1.5 Aesthetics**

The DEIR concludes the Project results in no significant impacts to any aesthetic criteria requiring CEQA analysis and requires no aesthetic mitigation. This includes any impacts associated with the proposed height of the buildings.

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**Community & Economic Benefits**

When considering the impacts of the Project identified by the DEIR, we hope that you also consider the benefits the Project would bring the City of Redwood City including \$45.55 million in Community Benefits:

- \$5.3 million to jumpstart the Woodside/101 interchange project (our original \$10 million offer reduced by a newly identified mitigation fee of \$4.7 million)
- \$17 million loan to the City to prefund the shortfall for construction of the Blomquist Bridge and Street Extension resulting in an opportunity cost of \$8 million to Jay Paul and considerable uncertainty of when or how we will be reimbursed while additional funding sources are identified.
- \$2.1 million for Blomquist Street and Old Seaport enhancements including a bike new paths to the Chestnut street undercrossing.
- \$5 million for the development of an Inner Harbor public park to provide all Redwood City residents better access to the Bay and new sports and recreation facilities.
- \$2.25 million for an East-West public shuttle available to all Redwood City residents at no charge
- \$12.4 million donation to the Saint Francis Center to be used toward the creation of permanently affordable housing units (this contribution is in addition to our housing impact fee)

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- \$1 million for Childcare within the Community (we are working with City staff and the community to determine how this contribution is distributed)
- \$2.25 million toward onsite public amenities
- \$7.25 million in community philanthropy including:
  - \$500,000 for the Redwood City Education Foundation
  - \$4.8 million for a complete renovation of the Boys and Girls Club in Redwood City.
  - \$500,000 in scholarships for Redwood City Youth.
  - \$250,000 for Reading Partners to support reading education in Redwood City Schools
  - \$1.2 million for the Magical Bridge Foundation
  - \$50,000 for SAL and PAL



9-7  
cont.

**Economic Benefits to the City**

The Harbor View project will bring significant economic benefit to the City of Redwood City. In an effort to fully understand and quantify those benefits, Jay Paul Company engaged Sedway Consulting Group to prepare a Fiscal and Economic Impact Study of the project. Highlights of this study include:

- \$2.1 million net annual increase to the City’s General Fund and Capital Outlay Fund. This is over and above the property tax revenue the City will receive that will completely offset the cost of City services provided to the Project.
- \$3.3 million in annual property tax revenue for the Redwood City Elementary School District
- \$2.3 million in annual property tax revenue for the Sequoia Union High School District
- \$34 million increase in annual local spending including \$6.8 million in restaurant sales
- 4,400 high paying, prevailing wage construction jobs

Jay Paul Company is a community minded developer who is committed to the long-term health and vitality of the communities that we partner with. Our application puts forward a project which entirely conforms with an existing zoning designation established by the City that is appropriate for the project location. Further, the Harbor View project would provide significant ongoing economic benefit to the City while providing significant Community Benefits.

To summarize, the DEIR concludes that the significant transportation and traffic impacts generated by the Project are similar to those of a project developed under the existing zoning or the General Plan and the cumulative Air Quality impact is not generated by the uses at the Project, but rather by the fact that we have a requested a general plan amendment. Any



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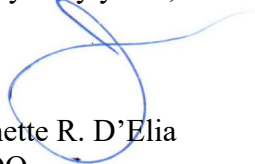
City of Redwood City  
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Page 8

development of the site, including uses developed under existing land use regulations would result in similar traffic impacts.

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| cont.

Thank you for your time and consideration.

Very truly yours,



Janette R. D'Elia  
COO

**Letter 9      Jay Paul Company**  
**Response     February 11, 2019**

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- 9-1                    This comment restates information that has already been disclosed in the Draft EIR, and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. No further response is required.
- 9-2                    The purpose of an EIR is to disclose to decision makers and the public potential environmental impacts of a project using reasonable assumptions based on substantial evidence. The amount of vehicle trip reduction associated with a TDM Plan is based on numerous variables including but not limited to: 1) the amount of transit service near the site; 2) quality of pedestrian and bicycle connections to the transit service; 3) quality of bicycle facilities providing access to the site; 4) the site's location vis a vis complementary land uses; 5) whether the building has one tenant or multiple tenants; 6) employee density; 7) the number of type of amenities on-site (e.g., food service, day care, and fitness center); 8) the availability and cost of parking; 9) the specific TDM measures provided; 10) the level of financial incentives/investment in the plan; and 11) the level of employer dedication to the TDM Plan. It is difficult to estimate the amount of vehicle trip reduction correlated with these variables for a site without knowing the tenants, since a large portion of a TDM Plan's success is based on the amount of financial investment and level of dedication. Since the specific tenant(s) of the development are not known, it would be speculative to presume financial investment and dedication to TDM would be comparable to other large campuses.
- For CEQA purposes, trip reductions are based on reasonable and substantiated estimates based on what is proposed rather than speculative future tenant investments. Also, when describing trip reduction goals, it is important to identify what constitutes the baseline. For example, the trip reduction goal may be based on a percentage reduction in vehicle trips based on a rate developed from local surveys of comparable building. But if the subject site has twice the employee density it would need twice the TDM participation level to achieve the trip reduction goal. Setting a vehicle trip cap or reduction with a rigorous monitoring program and a significant penalty system is the only way to guarantee vehicle trip reductions. The Project's fair share contribution could be recalculated once the vehicle trip cap has been established with a monitoring process that is acceptable to Redwood City.
- The Site TDM Plan proposed for the Applicant's Revised Project (Appendix B to this document) would achieve at least a 20.7 percent reduction in VMT and associated GHG emissions (a 22.0 percent reduction is proposed). See the

comparative analyses (*GHG/Climate Change and Transportation/Traffic*) in Chapter 2, and see Table 5-2 in Chapter 5 of this document. Also see response to comment 10-6.

- 9-3 This comment restates information that has already been disclosed in the Draft EIR (see Section 5.5.6 of the Draft EIR, *On-site Public Amenities Alternative*) and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. The Draft EIR fully assessed and disclosed the limitations of the On-Site Public Amenities alternative as they relate to sensitive air quality receptors at the site.
- 9-4 This comment restates information that has already been disclosed in the Draft EIR (see Section 4.8 of the Draft EIR, *Hydrology and Water Quality*) and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. Additional information concerning sea level rise has also been included in Master Response 2 in Chapter 5 of this Final EIR.
- 9-5 This comment restates information that has already been disclosed in the Draft EIR (see Section 4.11 of the Draft EIR, *Population, Housing, and Employment*) and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. Additional information concerning this topic has also been included in Master Response 3 in Chapter 5 of this Final EIR. With respect to the project applicant's recent pledge to provide funds for development of affordable housing and other community benefits, this comment will be forwarded to City decision-makers for consideration.
- 9-6 This comment restates information that has already been disclosed in the Draft EIR (see Section 4.1 of the Draft EIR, *Aesthetics*) and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. No further response is required.
- 9-7 This comment restates some of the information contained in the Draft EIR concerning potential community benefits that may be derived from the Project and the Project applicant (see Section 3.6 of the Draft EIR, *Potential Community Benefits*), and also supplements that list of potential benefits with additional items that may be negotiated with the City as part of an eventual Development Agreement. The comment does not raise any new environmental issues that are within the scope of CEQA, so no further response is required.
- 9-8 This comment restates information that has already been disclosed in the Draft EIR, and does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. The comment will be forwarded to City decision-makers for consideration. No further response is required.



March 8, 2019

Mayor Ian Bain  
 City of Redwood City, City Council  
 1017 Middlefield Road  
 Redwood City, CA 94063

RE: Harbor View  
 Additional Comments to Draft EIR

Dear Mayor Bain and Council Members,

Please see the below additional comments to the Harbor View Draft Environmental Impact Report.

**Revised Project Application**

In our letter to you dated Feb 20, 2019, we informed the City that, in response to City Council and Redwood City Community concerns raised at the Draft EIR comment hearing, we are in the process of preparing a revised application.

Generally, the project would be revised to:

- (1) reduce the square footage from 1,144,748 of commercial office use to 765,150 square feet of research and development and office use;
- (2) reduce the number of building from 4 to 3;
- (3) maintain the height of one of the remaining buildings at 7 stories and reduce the height of the two remaining buildings to 6 stories each;
- (4) maintain the amenities building of 35,000 square feet at 2 stories;
- (5) include a community building not to exceed 25,000 square feet and 2 stories;
- (6) provide parking at 2551 spaces plus 40 public spaces;
- (7) include approximately 11.5 acres (42%) of green space and landscape spaces.

We are also reevaluating the proposed community benefits in light of the reduced project and the inclusion of a new community center on the project site. We expect our revised application will include revised community benefits.

We expect to submit the revised application by mid to late April 2019. The revised project will reduce the project impacts and would not create any new project impacts beyond those identified in the Draft EIR for the main project or the alternatives. In particular, the alternative is similar in

10-1

size to the Reduced Buildout and Building Height alternative, identified in the DEIR as the Environmentally Superior alternative, and incorporates an on-site public amenity similar to the On-Site Amenities alternative. We would like the final EIR to address our revised application by comparing its impacts to the project and alternatives and identifying the mitigation measures that would apply.

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10-1  
cont.

**No Project Existing Zoning – Request to study full buildout permitted by Zone.**

The No Project Existing Zoning alternative studies a project of 70% R&D lab with 30% ancillary office rather than studying the mix of uses permitted by zone (eg. 50% office and 50% R&D lab). We therefore request that a second No Project Existing Zoning alternative be studied with the maximum use mix permitted by zone of 50% ancillary office and 50% R&D lab.

10-2

**Transportation & Traffic (Section 4.14)**

Please see the attached correspondence from TJKM Transportation Consultants providing additional comments to this section.

10-3

**Transportation Demand Management (Section 4-14.9)**

- The information in this section acknowledges the TDM measures will include specific trip generation reduction goals that likely would result in a greater trip reduction than shown in Table 4.14-24. Although the trip generation reduction goals have not yet been established, it would be helpful for this informational discussion to include typical trip reductions achieved for TDM plans with specific trip generation reduction goals as this is common practice for large companies operating in Redwood City and surrounding cities. This information would provide the public and decision makers with a better understanding of the likely trip reductions that could be expected for this project through implementation of the TDM.
- Additionally, the analysis of the TDM reductions should include all the required measures included in the City’s TDM Program adopted July 13, 2018 and in the TDM plan we submitted, which is attached for your reference. Please revise Tables 4.14-24 and 4.14-24 to reflect these measures.
- Table 4.14-24 inaccurately reflects the trip reductions achieved with MXD+ analysis as presented in Table 4.14-7. This table should start its analysis with Net External Vehicle Trips from Table 4.14-7 and then subsequently apply the TDM+ percentages. As noted in footnote 11, Page 4.14-87 of the DEIR, “Measures related to the location of the site are fixed and are already accounted for in the trip generation as a part of the MXD+ analysis.” Failing to use the Net External Vehicle trips data does not give credit for the measures included in the MXD+ analysis which are excluded from the TDM+ analysis.

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10-6



City of Redwood City  
March 8, 2019  
Page 3

- We request that Table 5-1 Summary of Alternatives to the Harbor View Project be revised to include the trip generation with TDM (similar to the information presented in table 4.14-24.
- Please see the additional TDM comments from TJKM Transportation Consultants attached herein.

10-7

**Jobs-Housing Balance (Section 4.11)**

Please see the attached correspondence from Sedway & Associates which incorporates our comments to the Jobs-Housing Balance section of the DEIR.

10-8

**Hydrology and Water Quality (Section 4.8)**

BKF Civil Engineers provided the following comment after their review of the DEIR:

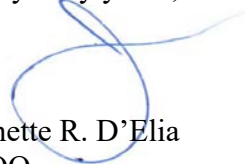
Impact HYD-5 – This mitigation measure states that the Project shall install a new redundant duty pump at the both the Oddstad and Seaport pump stations as described in the “Inner Harbor Specific Plan Utilities Engineering” report by West Yost. The report states that both pump stations currently have capacity for the 10-year and 100-year storm drain event with both duty pumps active. To add a new redundant duty pump, the pump stations would need to be rebuilt. The Oddstad pump station serves a drainage area of about 101 acres. The Project drains about 27 acres to the pump station.

10-9

We do not understand why the project would be required to replace the pump stations given that they currently have capacity for the 100-year event. We also do not see why the project would entirely be responsible to replace the Oddstad Pump Station given that the project site that drains to the pump station is only about 27% of the total drainage area to the pump station. The portion of the site that drains to the Seaport pump station is also a small percentage of the total drainage area to the pump station.

Thank you for your time and consideration; we are committed to working with the City, Staff and the Community to bring forward a project that will be an asset to the Community for many years to come.

Very truly yours,



Janette R. D'Elia  
COO



## Technical Memorandum

*Date:* March 8, 2019

*To:* Janette O'Elia  
Jay Paul Company

*From:* Chris Kinzel & Colin Burgett

*Jurisdiction:* Redwood City

*Subject:* **Comments to Harbor View DEIR Transportation Analysis – (Section 4-14)**

TJKM submits the following supplemental comments on the Harbor View DEIR based on our review of the Transportation and Traffic analysis described in section 4.14 of the DEIR:

1. Mitigation Measures TRANS-2A, TRANS-7, TRANS -8A, TRANS-13, TRANS-15, TRANS-22, TRANS-23A, TRANS-29: These mitigation measures call for a “fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvement to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.”

As stated in the DEIR: the US 101/SR 84 Interchange Improvement Project is not under the City's control and funding is uncertain. Thus, it is not certain that Caltrans will implement the improvement project. (DEIR pp. 4-14.12, 4.14-44, 4.14-47, 4.14-50, 4.14-71, 4.14-72, 4.14-75.) The EIR should provide information on the status and details of the fair-share funding mechanism. Does the City have an agreement with Caltrans and other relevant local or regional transportation agencies for establishing, collecting, transferring, and, if necessary due to a failure to implement the project, reimbursing this fee pursuant to an enforceable fee program?

2. Mitigation Measures TRANS-2B, TRANS-8B, TRANS-23C: These mitigation measures call for the Project applicant to “construct geometric changes to the westbound (Middlefield) approach at Woodside Road/Middlefield Road to the satisfaction of

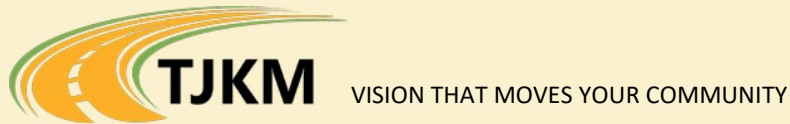
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DBE #40772 ♦ SBE #38780



the City, including two left-turn lane pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.”

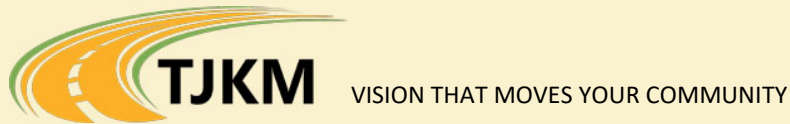
The DEIR notes this mitigation measure is not consistent with recently constructed and future City plans at this location. (Draft EIR pp. 4.14-38, 4.14-42, 4.14-72.) During past planning efforts, including the Hoover Area Mobility Plan, the City of Redwood City indicated a preference for pedestrian and bicycle improvements at this intersection (not an emphasis on traffic capacity). The EIR should describe the city’s current future plans for the intersection, and assess the effect of the proposed mitigation on those future plans. In considering approval of the Project, the City may determine this mitigation is infeasible due to the recent physical improvements and future City plans for this location. An infeasible mitigation measure may not be imposed on the Project.

3. Mitigation Measures TRANS-12A, TRANS-14A, and TRANS-28A: These mitigation measures call for the Project applicant to “exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 southbound north of Whipple and northbound south of Woodside Road.”

However, the feasibility of physically widening US 101 is extremely unlikely on many segments given the close proximity of existing residences and businesses, particularly to the south where US 101 passes through portions of Menlo Park and East Palo Alto.

The DEIR acknowledges that this mitigation measure may not be feasible due to right-of-way constraints and the City’s lack of authority to independently implement the mitigation because the freeway is under Caltrans jurisdiction. (Draft EIR pp. 4.14-45, 4.14-48, 4.14-81.)

In addition to the lack of a clear timeframe associated with the proposed mitigation: the costs that would be associated with this mitigation measure could not feasibly be funded by one project, while existing traffic volumes on US 101 accounts for most of the impact (as existing traffic demand already exceeds capacity on US 101).



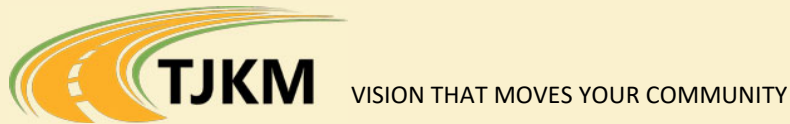
4. Mitigation Measure TRANS-25A: This mitigation measure calls for the applicant to “construct intersection geometry improvements at Bair Island Road/East Bayshore Road. The geometry improvements are widening the roundabout to two circulation lanes, and changing the westbound approach to one through lane and a 100-foot right turn pocket. In addition, the south bound approach would be widened into two lanes, one left-turn lane and one right -turn lane.”

The DEIR acknowledges that this “significant intersection expansion conflicts with City plans and goal related to multimodal access and safety”, and would cause secondary impacts to pedestrian and bicycle safety, and may be infeasible due to right of way constraints. (Draft EIR p.4.14-73). The DEIR identified this impact as “significant and unavoidable” given those considerations.

This impact does not occur under Existing plus Project Conditions, as the intersection would operate at LOS A during the a.m. peak hour, and LOS B (with just 11 seconds of average delay) during the p.m. peak hour, with the addition of Project traffic, as shown on DEIR Table 4.14-9.

Instead: this impact only occurs under Cumulative Conditions during the p.m. peak hour only, as the intersection is predicted to operate unacceptably at LOS F under Cumulative Conditions (without the Project). The a.m. peak hour would operate acceptably at LOS B under Cumulative plus Project conditions.

Since this impact does not occur under Existing plus Project conditions – and would occur under Cumulative Conditions without the Project – the Project should only be responsible for, at most, providing a fair-share contribution towards mitigating the cumulative impact. The Project should not be responsible for constructing the mitigation. Furthermore: the mitigation would impact bicyclists and pedestrians unnecessarily if installed in the immediate future, since the proposed traffic mitigation is intended to reduce traffic delay under Cumulative Conditions (during the p.m. peak hour). Given those considerations: the proposed mitigation should be deleted altogether, and the DEIR should simply note that the project will contribute to a significant and unavoidable cumulative impact during the p.m. peak hour at this location.



5. Mitigation Measure 26: similar to comment 4 above, this mitigation to intersection #4 (Maple Street & Veterans Boulevard) would require the project to install physical improvements prior to occupancy, The required improvements would include extending two turn pockets, and making changes to signal timing. However, the impact occurs only cumulative conditions (and the intersection would operate unacceptably at LOS F under Cumulative No Project conditions). The impact is not significant under Existing plus Project conditions, as the intersection would operate acceptably at LOS C or D during both peak hours under Existing plus Project conditions. Since this is a cumulative impact only – and would occur without the Project – the Project should only be responsible for contributing a fair-share contribution to the improvements. The Project should not be responsible for constructing the improvements. In addition: the signal timing changes – which would include extending the cycle from 116 to 160 seconds – were developed based on the forecasted cumulative volumes, but could result in unnecessary added delay under Existing plus Project conditions. For example: the effects of long, 160-second cycles include longer waits for pedestrians and bicyclists, and increased delay to lower-volume movements.



## Technical Memorandum

*Date:* March 8, 2019

*To:* Julia Morini and C. Thomas Gilman  
DES Architects

*From:* Chris Kinzel & Colin Burgett

*Jurisdiction:* Redwood City

*Subject:* **Peer Review of Harbor View DEIR Transportation Analysis- TDM  
(Section 4.14.9)**

TJKM conducted a peer review of the Transportation and Traffic chapter of the Draft Environmental Impact Report (DEIR) prepared in January 2019 for the proposed Harbor View project. TJKM reviewed the TIA report including the site plan, criteria, methodology, travel demand forecast, LOS results, findings, and recommendations.

As described in the DEIR: the proposed project would provide 1,144,748 square feet of General Office space and 3,855 motor vehicle parking spaces. Presuming a typical office occupancy rate of three employees per thousand square feet: the site would thus accommodate approximately 3,434 employees, consistent with the population forecast described on page 4.14-31 of the DEIR.

Key findings and recommendations are summarized below:

1. **Trip Generation Forecast:** the vehicle trip generation forecast is based on national Institute of Transportation Engineers (ITE) rates, with a slight reduction to account for proximity to other land uses, and area-wide transportation facilities. However, this forecast is much higher than the rates of traffic generated by Bay Area office campuses that have implemented comprehensive transportation demand management (TDM) program similar to Bay Area office campuses.
  - a. The DEIR on page 4.14-28 (Table 4.14-7) predicts the project will generate 1,254 a.m. and 1,282 p.m. peak hour vehicle trips, and 8,090 daily vehicle trips. The trip generation forecast was derived from standard ITE trip generation rate for General Office space, with a reduction (referred to in the report as "MXD+ Vehicle

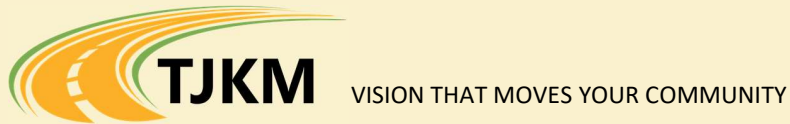
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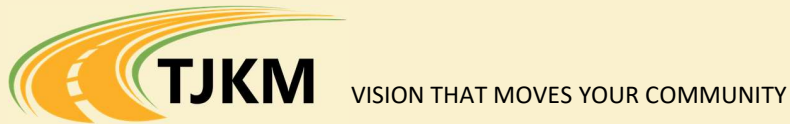
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*Trip Reductions*") to account for "built environment factors" that reduce trip generation rates, such as the density and diversity of land uses, design of the pedestrian and bicycling environment, demographics of the site, and distance to transit. Applying the *MXD+ Vehicle Trip Reductions* reduced the vehicle trip generation forecast by 6.7 percent during the a.m. peak hour and 5.9 percent during the p.m. peak hour. Based on the projected population of 3,434 employees described in the DEIR, **the forecasted traffic volume equates to a rate of 0.36 vehicle trips per employee during the a.m. peak hour, 0.37 vehicle trips per employees per employee during the p.m. peak hour, and 2.36 daily vehicle trips per employees.** (Please note that these "per employee" rates include trips made by non-employees, such as visits by clients, guests, maintenance and deliveries).

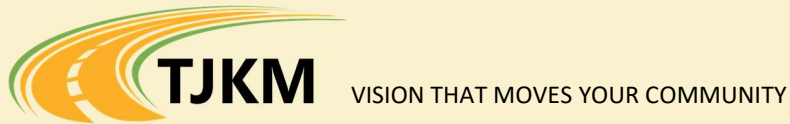
**b. By contrast, Bay Area office campuses with comprehensive TDM programs have achieved substantial reductions in peak-hour vehicle trips per employee, generating a rate of traffic substantially lower than Harbor View DEIR forecast.** For example:

- i. The Apple, Inc. campuses in Cupertino generate traffic at a rate not exceeding 0.30 vehicle trips per employee during the a.m. peak hour, and 0.31 vehicle trips per employee during the p.m. peak hour. Furthermore: based on spring 2018 vehicle counts administered by the City of Cupertino at the new (Apple Park) campus: **Apple Park was found to generate traffic at an even lower rate of just 0.22 vehicle trips per employee during the a.m. peak hour, and 0.23 vehicle trips per employee during the p.m. peak hour – thus about 38 percent lower than the rate per employee predicted by the Harbor View DEIR for the p.m. peak hour.** The Apple TDM program includes commuter shuttle bus service to/from multiple locations including the nearest Caltrain Station and various residential areas throughout the Bay Area. In addition, bicycle lanes have been installed on streets providing access to the campus.
- ii. **Facebook Campus (Menlo Park) generates less than 0.3 vehicle trips per employee during both the a.m. and p.m. peak hours.** The Facebook TDM program includes shuttle bus service to the nearest Caltrain stations as well as commuter shuttle bus service to various residential areas throughout the Bay Area.



2. **Project TDM Plan & Trip Reductions:** page 4.14-85 of the DEIR notes that the project sponsor submitted a proposed TDM plan in a February 2018 memo. Based on review of the applicant's February 2018 TDM Plan memo: the project applicant proposed a total of 17 TDM measures including shuttle bus service to downtown Redwood City and Caltrain, and commuter bus service to shuttle employees between work and their cities of residence. Table 4.14-23 on page 4.14-86 provides "*an example TDM plan similar to the one proposed in the memo, and largely similar to those in place at other large parks in the region*". Table 4.14-23 lists a total of 16 TDM measures, including peak hour shuttle bus service (22-seat shuttle buses every 15 minutes), but does not include the commuter shuttle bus service to employees' cities of residence that was proposed by the applicant.
  - a. While the DEIR requires a TDM Plan as mitigation, the DEIR analysis of traffic impacts and forecasted volume of project trips at specific locations was not revised to account for reductions in vehicle trips that would result, nor does the DEIR indicate that the project's fair share contribution to transportation improvements would be reduced to account for trip reductions achievable with TDM.
  - b. The DEIR does provide an estimate of potential TDM trip reductions on page 4.14-88 (Table 4.14-25) – which predicts a 13.6 percent reduction in peak-hour vehicle trips based on the trip reduction benefits resulting from six of the proposed 16 TDM measures (and also included provision of pedestrian paths within the site on Table 4.14-25 although not included in the preliminary TDM plan) - but does not include potential trip reductions resulting from all of the proposed TDM measures. In particular: page 4.14-87 of the DEIR states that the TDM trip reduction forecast does not include "highly effective and innovative programs" such as "commuter shuttles" as is typical on other campuses throughout the region". (The TDM trip reduction table included a small reduction for shuttle buses to transit stations, but not other types of commuter shuttles operated by Bay Area employers). Furthermore: in addition to underestimating the potential TDM trip reduction rate: the TDM trip reduction shown on Table 4.14-25 applied the 13.6 percent reduction to unadjusted ITE rates (not the net vehicle trip generation forecast shown on Page 4.14-28, Table 4.14-7 which incorporated MXD+ Trip Reductions to account for built environment factors), thus overestimating the "Total vehicle trips with TDM Plan" shown on Table 4.14-14. The built environment factors included in the MXD+ Trip Reduction (density and diversity of land uses, design of the pedestrian and bicycling environment,

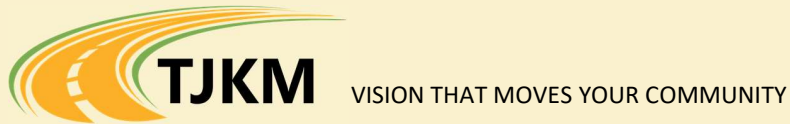




demographics of the site, and distance to transit) would not overlap with the non-physical TDM measures show in the applicant's preliminary TDM plan which include shuttle bus service, commuter shuttles, and flexible work hours.

Therefore, at a minimum: both reductions should apply (with the exception of the 2% trip reduction for on-site pedestrian facilities included on Table 4.14-25) – in which case the project vehicle trip generation would be reduced by at least 11.6 percent from Table 4.14-7. This would reduce project vehicle trip generation to 1,108 a.m. peak hour and 1,133 p.m. peak hour vehicle trips, which equates to a rate of 0.32 per employee during the a.m. peak hour, and 0.33 per employee during the p.m. peak hour (which as noted above: would be further reduced through provision of commuter shuttle buses, not limited to transit station shuttles).

3. **The DEIR estimate of TDM trip reductions (page 4.14-88, Table 4.14-25) grossly underestimates the trip reduction benefits of flexible work schedules** and/or staggered work schedules (i.e., allowing or even requiring employees to begin and end their work-day outside of the peak traffic hours). **At many campuses throughout the Bay Area, a significant portion of peak-hour trip reductions have occurred because a large share of employees at Bay Area office campuses tend to work from approximately 10 am. To 7 p.m.** The DEIR predicts just a 0.7 percent reduction from "Alternate Schedules/Telecommute Program" – but the data sources used for that estimate were perhaps limited occasional telecommuters (but not based on the type of flexible schedules common among employers such as Google and Genentech to avoid generating peak-hour trips).
  
4. **The DEIR analysis of traffic impacts to intersections, on/off ramps and US 101, and the forecast of vehicle miles traveled (VMT) should be revised to include "mitigated" scenarios that quantify the reduced effect of the project with the proposed TDM measures,** including commuter shuttle bus service to employee's cities of residence. As described in #2 above: the trip reduction benefits of the TDM measures should be applied to the trip generation forecast shown on Table 4.14-7 (after applying the MXD+ that accounts only for characteristics of the built environment near the site, but does not account for the provision of non-physical TDM measures such as shuttle bus service, commuter shuttles and flexible work hours). Mitigated scenarios should be provided for each of the "with Project"



scenarios analyzed in the DEIR, in order to show the volume of traffic, VMT and level of significance with the provision of the TDM measures.

5. Contributing to the planned Blomquist Bridge seems reasonable, despite the relatively limited usage it will receive, but **it seems likely that existing land uses in the area will constitute a significant portion of actual usage** (particularly given the existing LOS F conditions at the applicable intersections), including the use of the bridge as a by-pass route to avoid congestion on US 101. Therefore, new development should be responsible for only a portion of the cost, when calculating fair share contributions.
6. Remaining elements of the DEIR transportation analysis are reasonable, based on the high volume of traffic generation presumed, but as noted above: the provision of a comprehensive TDM program would result in a substantial reduction in vehicle trips (potentially over 30 percent based on successful Bay Area campus TDM programs).

Please let us know if any additional information or clarification is requested. Thank you!

Sedway Consulting  
1661 Pine St. #426  
San Francisco CA 94109

SEDWAYCONSULTING  
real estate & urban economics

March 7, 2019

Ms. Janette D'Elia  
Senior Vice President and COO  
Jay Paul Company  
Four Embarcadero Center, Suite 3620  
San Francisco, CA 94111

**Re: Harbor View Project Draft Environmental Impact Report Response**

Dear Ms. D'Elia:

As requested, Sedway Consulting has reviewed selected portions of the Draft Environmental Impact Report (DEIR) for the Harbor View Project (Project) in the City of Redwood City. The DEIR is referenced as "Harbor View Project Draft Environmental Impact Report SCH No. 2018012016" dated January 2019. The report was prepared for the City of Redwood City by Environmental Science Associates (ESA). Specifically, Sedway Consulting was asked to review the text associated with the discussion of "Jobs-Housing Balance" in Redwood City. This letter presents Sedway Consulting's findings with respect to jobs-housing balance.

**JOBS-HOUSING BALANCE**

In the DEIR, jobs-housing balance is discussed in Section 4.11 Population, Housing and Employment, the introduction to which states that "for informational purposes, this section also discusses jobs/housing balance."<sup>1</sup> Much of the data presented in this section are based on the Association of Bay Governments (ABAG) *Projections 2013* publication. However, as indicated in the DEIR, *Projections 2013* does not present 2018 data; instead data for this year are interpolated from years 2015 and 2020. In its review of the jobs-housing balance section, Sedway Consulting has commented on some of the data presented and the discussion.

**Total Jobs Per Household Calculations**

Employment and jobs per household are first presented in Table 4.11-3 "Estimated Job Trends and Growth for Redwood City and San Mateo County – 2010 to 2040" on page 4.11-4. However, this table contains a few calculation errors with regard to the Total Jobs Per Household lines as follows:

- Redwood City 2010: Should be **2.08** ( $58,080 \div 27,957$ ), not 2.69 as indicated.
- Redwood City 2040: Should be **2.10** ( $77,480 \div 36,860$ ), not 2.73 as indicated.
- San Mateo County 2030: Should be **1.42** ( $421,500 \div 296,280$ ), not 2.79 as indicated.<sup>2</sup>

<sup>1</sup> "Harbor View Project Draft Environmental Impact Report SCH No. 2018012016" (DEIR), page 4.11-1.

<sup>2</sup> There is also a minor rounding error with regard to the Total Jobs Per Household calculation for Redwood City 2018, which is rounded to the nearest 10<sup>th</sup> while the other ratios are rounded to the nearest 100<sup>th</sup>. This figure should be **2.25**. On page 4.11-10, this ratio is referred to as "2.2 jobs per housing unit."

### Calculation of Project Household Demand

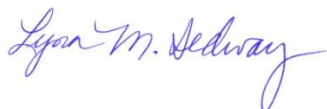
The report identifies a “scenario that assumes 50 percent of the new employees (2,290 employees) would relocate to Redwood City and move into a newly-constructed home.”<sup>3</sup> This is a conservative assumption and the data Sedway Consulting has examined would support a revised assumption. In its July 2017 report “Fiscal and Economic Impact Study of Harbor View,” Sedway Consulting used the U.S. Census American Community Survey as the basis for its estimate that 29% of the potential Project employees would reside in the City of Redwood City. A check of both the one-year and five-year more recent estimates indicates a slightly lower ratio of 28%.<sup>4</sup> This indicates that 1,282 potential Project employees may seek to live in Redwood City (4,579 \* 28%). Continuing with the DEIR method, 15% of these workers are assumed to create a shared household – reducing the number to 1,090. This is then divided by 1 minus the housing vacancy rate (2.1% per Footnote 6 on page 4.11-11)<sup>5</sup> to result in an estimated demand for 1,113 units. This revised estimate is 54% of the housing demand for 2,043 housing units estimated in the DEIR. This revised assumption would affect the assumption used in Impact PSR-3.

### Project Household Demand and Potential Supply

With a smaller Project household demand, as well as consideration of potential supply additions, including 273 approved units and 480 units under review (application submitted to the city prior to 2018) – not including another three projects totaling 336 units proposed in 2018 – plus the 3,333 units identified in the city’s 2015-2023 Housing Element, there appears to be enough potential supply to meet the estimated Project housing demand. In contrast to the conclusion that “new housing demand that may result from the new Project employees wanting to live in Redwood City (2,043 units)...could be adequately addressed in part by the anticipated housing units expected to be developed by 2040,” Sedway Consulting believes that this demand could be met much closer to 2020.

It has been a pleasure working with you on this interesting project. Please let me know if there are any questions or comments.

Sincerely,



Lynn M. Sedway



Mary A. Smitheram-Sheldon

<sup>3</sup> Both quotes, Ibid. p. 4.12-10.

<sup>4</sup> Source: U.S. Census Bureau, 2013-2017 American Community Survey 5 –Year Estimates and U.S. Census Bureau, 2017 American Community Survey 1 –Year Estimates; “Sex of Workers by Pace of Work – Place Level,” for City of Redwood City.

<sup>5</sup> It appears that a higher vacancy rate was used in Section 4.12, as the 1,946 new households is translated to 2,043 new units – for a calculated vacancy rate of 4.75%.

**Letter 10**      **Jay Paul Company**  
**Response**      **March 8, 2019**

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- 10-1            This comment outlines the general parameters of the Applicant’s Revised Project, which is analyzed in Chapter 2 of this Final EIR. No further response is provided here.
- 10-2            This comment outlines the general parameters of the No Project – Existing Zoning 50/50 R&D Lab + Ancillary R&D Office Alternative, which has been included in Chapter 3 of this Final EIR as an additional alternative. Readers are referred to Chapter 3 for a description and analysis of that alternative. No further response is provided here.
- 10-3            This comment refers to a supplemental letter by TJKM concerning the Draft EIR’s transportation analysis and provided as part of the commenter’s letter. This response is organized by the numbered comments provided in the supplemental letter.

**Fair Share Contributions.** In response to #1 in the TJKM letter, at this time there is no specific mechanism in place between the City and Caltrans to collect and transfer the 101/84 fair share contribution. However, the City will work to establish such a mechanism.

**Woodside Road/Middlefield Road.** In response to #2 in the TJKM letter, the Draft EIR identified geometric changes that would be needed to improve intersection operations at the intersection of Woodside Road / Middlefield Road. The Draft EIR evaluation determined that those geometric changes were infeasible for various reasons, including inconsistency with recently constructed and future City plans at this location and in certain cases, insufficient right-of-way to accommodate the changes. Although the Draft EIR identified these geometric changes as infeasible, they were inadvertently included in the document as Mitigation Measures TRANS-2B, TRANS-8B, and TRANS-23C. The following clarifications are made to the Draft EIR to omit these infeasible mitigation measures. These clarifications do not remove mitigation measures that were intended to apply to the proposed project, nor do they change any conclusions in the Draft EIR.

Starting on Draft EIR p. 4.14-37, the following text is clarified:

**Impact TRANS-2: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Potentially Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at intersection #11 Woodside Road / Middlefield Road, which currently operate at LOS F.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-2A:** The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.

~~In addition to the capacity increase along Woodside Road as outlined in Mitigation Measure TRANS-2A, an~~ An additional mitigation measure ~~could~~ would be required to improve intersection operations at the intersection of Woodside Road / Middlefield Road. ~~The measure would involve the~~ Mitigation Measure TRANS-2B: ~~Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construction of geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left-turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.~~

~~Implementation of this~~ these geometric changes ~~mitigation measure~~ would improve operations at the Woodside Road / Middlefield Road study intersection in both the AM and PM peak hours and would reduce impacts to less than significant levels. However, ~~the geometric changes listed in Mitigation Measure TRANS-2B~~ these changes are not consistent with recently constructed and future City plans at this location. Therefore, these additional geometric changes cannot be implemented.

Overall, implementation of Mitigation Measure TRANS-2A will apply to the impact, which would remain significant and unavoidable. Also, because of the City's lack of authority to independently implement, this impact remains significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

Starting on Draft EIR p. 4.14-43, the following text is clarified:

**Impact TRANS-8: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Intersection #11) (Criteria a and b). (Potentially Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at intersection #11 Woodside Road / Middlefield Road, which currently operate at LOS F.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-8A:** The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.

~~In addition to the capacity increase along Woodside Road as outlined in Mitigation Measure TRANS-8A, an An additional mitigation measure could would be required to improve intersection operations at the intersection of Woodside Road / Middlefield Road. The measure would involve the **Mitigation Measure TRANS-8B:** ~~Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ construction of geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left-turn pockets of 400 feet, one through lane, and a shared through-right lane pocket of 100 feet.~~

Implementation of this mitigation measure would improve operations at the Woodside Road / Middlefield Road study intersection in both the AM and PM peak hours and would reduce impacts to less than significant levels. However, ~~the geometric changes listed in Mitigation Measure TRANS-8B~~ these changes are not consistent with recently

constructed and future City plans at this location. Therefore, these additional geometric changes cannot be implemented.

Overall, implementation of Mitigation Measure TRANS-8A will apply to the impact, which would remain significant and unavoidable. Also, because of the City's lack of authority to independently implement, this impact remains significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

Starting on Draft EIR p. 4.14-73, the following text is clarified:

**Impact TRANS-23: The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially (Criteria a and b). (Significant)**

Specifically, the Project would cause delay to worsen by more than five seconds at the intersections of #10 Bay Road at Woodside Road and #11 Woodside Road / Middlefield Road, both of which operate at an unacceptable LOS during the AM and/or PM peak hours without the Project.

The US 101/SR 84 (Woodside Road) Interchange Project proposes to increase traffic capacity at the interchange and improve intersection operations along the corridor. Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects such as the US 101/SR 84 (Woodside Road) Interchange Improvement Project.

**Mitigation Measure TRANS-23A:** Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.

~~In addition to the capacity increases along Woodside Road as outlined in Mitigation Measure TRANS-23A, several a~~ Additional mitigation measures ~~could~~ would be required to improve intersection operations further along the Woodside Road corridor as set forth below.

~~**Mitigation Measure TRANS-23B:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ An additional measure could implement geometric changes to intersection #10 Bay



Road/Woodside Road to the satisfaction of the City. Changes ~~are to~~ would convert the eastbound (Bay Road) approach to a left-turn pocket of 100 feet, one through lane, and a shared through-right lane, add a northbound (Woodside Road) through lane, and convert the westbound approach to a right-turn pocket of 250 feet, a left-turn pocket of 250 feet, and three westbound through lanes. Additionally, the overall cycle length ~~shall~~ could be optimized while adding protected left-turn phases for both the westbound and eastbound movements.

~~Mitigation Measure TRANS-23C: Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall~~ Another additional measure could implement geometric changes to intersection #11 Woodside Road/Middlefield Road to the satisfaction of the City. Changes ~~are to~~ could modify the westbound (Middlefield Road) approach to two left-turn lanes with 400-foot pockets, one through lane, and one shared through-right lane with a 100-foot pocket.

~~Implementation of Mitigation Measures TRANS-23B and TRANS-23C~~ The possible geometric changes described above would result in the intersections #10 and #11 still operating at unacceptable levels but within the five second threshold. However, these geometric changes listed are not consistent with recently approved and future City plans at these locations. Additionally, there is insufficient right-of-way provided to implement the mitigation. Therefore, these additional geometric changes cannot be implemented.

Overall, implementation of Mitigation Measure TRANS-23A will apply to the impact, which would remain significant and unavoidable. Also, because of the City's lack of authority to independently implement, this impact remains significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

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~~Mitigation Measure TRANS-23D~~ **TRANS-23B:** As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.

Overall, implementation of Mitigation Measures TRANS-23A and 23-B would reduce impacts. However, the City lacks authority to independently implement TRANS-23A and the changes discussed above are infeasible. In addition, dDue to the severity of the congestion at this

location, it is unlikely that a TDM Plan could reduce this impact to a less-than-significant level. Therefore, impacts remain significant and unavoidable.

**Significance after Mitigation:** Significant and Unavoidable

**Mixed Flow and/or HOV Lanes on US 101.** In response to #3 in the TJKM letter, after publication of the Draft EIR and prior to preparation of these Responses to Comments and Final EIR, Mitigation Measures TRANS-12A, TRANS-14A, and TRANS-28A (to address US 101 southbound north of Whipple and northbound south of Woodside Road) were fully implemented by Caltrans. Therefore, no action is required by the Project Applicant regarding these mitigation measures, as noted in the MMRP.

**Bair Island Road/East Bayshore Road Geometric Changes.** In response to #4 in the TJKM letter, the Draft EIR identified geometric changes that would be needed to improve intersection operations on Bair Island Road/East Bayshore Road. The Draft EIR evaluation determined that those geometric changes were infeasible for various reasons, including inconsistency with City plans and goals related to multimodal access and safety, right-of-way constraints, in addition to causing secondary impacts to pedestrian and bicycle safety.

Although the Draft EIR identified these geometric changes as infeasible, they were inadvertently included in the document as Mitigation Measure TRANS-25A. The following clarifications are made to the Draft EIR to omit this infeasible mitigation measure. These clarifications do not remove a mitigation measure that was intended to apply to the proposed project, nor do they change any conclusions in the Draft EIR.

Starting on Draft EIR p. 4.14-74, the following text is clarified:

**Impact TRANS-25: The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the PM peak hour for intersection #3 Bair Island Road / East Bayshore Road (Criteria a and b). (Significant)**

The worsening traffic operations at this location are due to the increase in outbound traffic destined for the northbound US 101 on-ramp from the Project site. A possible mitigation measure could be the ~~Mitigation Measure TRANS-25A:~~ Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construction of intersection geometry improvements at Bair Island Road / East Bayshore Road. The geometry improvements ~~could~~ are widening the roundabout to two circulation lanes, and change~~ing~~ the westbound approach to one

through lane and a 100-foot right turn pocket. In addition, the southbound approach ~~could~~would be widened into two lanes, one left-turn and one right-turn lane.

~~These p~~Physical improvements to the intersection geometry would improve operations of this intersection to LOS E during the PM peak hour (with less vehicle delay than Cumulative No Project conditions). However, significant intersection expansion such as those achieved by the physical improvement described above, conflicts with City plans and goals related to multimodal access and safety. The intersection expansion would cause secondary impacts to pedestrian and bicycle safety. Further, ~~this mitigation measure~~these physical improvement may be infeasible due to right-of-way constraints. Therefore, this mitigation measure cannot be implemented.

**Significance after Mitigation:** Significant and Unavoidable

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~~However, the~~The following mitigation measure would ~~be required to~~ address the traffic operations at this location:

~~Mitigation Measure TRANS-25B~~TRANS-25: ~~As a secondary mitigation measure, t~~The Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.

Due to the severity of the congestion at this location, it is unlikely that a TDM Plan could reduce this impact to a less-than-significant level.

**Significance after Mitigation:** Significant and Unavoidable

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**Maple Street/Veterans Boulevard Intersection Improvements.** In response to #5 in the TJKM letter, the Project shall provide a fair-share contribution towards improvements identified in Mitigation Measure TRANS-26. Signal timing changes would not necessarily be implemented as a result of the Project, but rather are identified as a mitigation measure to address cumulative conditions. Mitigation Measure TRANS-26 in the Draft EIR is clarified below.

Starting on Draft EIR p. 4.14-75, the following text is clarified:

Fees paid by proposed development projects would help improve traffic conditions by funding needed transportation projects.

**Mitigation Measure TRANS-26:** Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall contribute its fair share contribution to implement geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet to 250 feet or to the satisfaction of the City; and to. ~~In addition, the applicant shall make signal improvements to optimize overall cycle length and adjust green split timing. Green time shall be added to the eastbound left turn movement (phase 1), westbound left turn movement (phase 5), and northbound and southbound through movements (phase 4), while overall cycle length shall extend from 116 second to 160 seconds. Project applicant shall also coordinate with the City to ensure that signal timing changes do not negatively affect adjacent coordinated signals along Veterans Boulevard.~~

**Significance after Mitigation:** Significant and Unavoidable

**Trip Generation Forecasts.** In response to #1 in TJKM letter regarding Section 4.14.9, see Master Response 1 in Chapter 5 of this Final EIR. The trip generation estimates have been revised to incorporate the Revised Project description and trip generation rates on a per employee basis derived from surveys of office buildings in Redwood City. The rates are 0.33 and 0.27 vehicle trips per employee during the AM and PM peak hours, respectively (see Table 5-2 in Chapter 5 of this document).

**Project TDM Plan and Trip Reductions.** In response to #2 in TJKM letter regarding Section 4.14.9, see response to comments 9-2; see Master Response #1 in Chapter 5, *Master Responses*, of this document; and see Appendix B to this document.

**TDM Trip Reductions.** In response to #3 in TJKM letter regarding Section 4.14.9, see Master Response #1 in Chapter 5 of this document. The trip generation estimates have been revised to incorporate the revised Project and trip generation rates on a per employee basis derived from surveys of office buildings in Redwood City. The revised analysis shows the rates are 0.33 and 0.27 vehicle trips per employee during the AM and PM peak hours, respectively. These rates are similar to the rates presented in the comment. As the TDM Plan is not yet operational and the City has not yet selected a trip reduction goal, no further reductions have been applied.

The trip reductions in Table 4.14-25 are based on empirical research to provide the required substantial evidence needed for EIRs to ensure that potential impacts are disclosed. The revised trip generation estimates are based on rates derived

from local surveys that account for local travel behavior. It is likely that they account for some level of trip reduction due to flexible schedules which are ubiquitous in the Bay Area. Therefore, an additional reduction is not warranted.

The City has not yet selected a trip reduction goal/trip cap, rigorous monitoring program, and penalty system and therefore there is no assurance what trip reduction will be achieved, and attempting to assign a likely reduction would be speculative. Therefore, an analysis of the impacted locations with the TDM mitigation was not conducted as the trip reduction is uncertain.

**Blomquist Bridge Construction.** In response to #5 in TJKM letter regarding Section 4.14.9, the Blomquist Bridge is not listed as a mitigation measure for any Project impact identified in the DEIR. As stated on page 4.14-8 of the Draft EIR, the Blomquist extension is included in the Transportation Impact Mitigation Fee Program (TIF). The total cost estimate for the Blomquist extension included in the TIF is already a fraction of the total overall cost of the Project. Therefore, a fair share to account for existing trips that will use the extension is already accounted for.

**Other Aspects of the Draft EIR Transportation Analysis.** Please refer to the preceding responses as relates to the effectiveness of the TDM Plan.

These comments do not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. No further response is required.

10-4 Please refer to response to comment 10-3, above.

10-5 Table 4.14-23 of the Draft EIR includes trip “credits” for TDM Plan components per the San Mateo County City/County Association of Governments (C/CAG) guidelines. Table 4.4-24 shows expected Project trip generation including vehicle trip reductions associated with the draft TDM Plan (Appendix F.5 to the Draft EIR). Both tables and Section 4.14.9 of the Draft EIR are based on the draft TDM Plan. The purpose of the EIR is to disclose potential impacts and mitigations. The purpose of the TDM Plan is to reduce vehicle trips, and that effect has been sufficiently documented in the Draft EIR (also see response to comment 10-6, below).

Since then, a Site TDM Plan has been prepared for the Project Applicant's Revised Project (Appendix B to this document) but has not yet been finalized or approved by the City. The Site TDM Plan will change the total trip reduction but will not materially affect the conclusions of the Draft EIR. Implementing a TDM Plan is required to help mitigate significant impacts but it is unlikely to reduce vehicle delay and level of service (LOS) impacts identified in the Draft EIR to less-than-significant levels. See the comparative analysis

(*Transportation/Traffic*) in Chapter 2, and see Table 5-2 in Chapter 5 of this document.

- 10-6 Per the comment, Table 4.14-24 of the Draft EIR has been revised to correctly show net external vehicle trips (including MXD+ reductions).

**DEIR TABLE 4.14-24 (MODIFIED)  
TRIP GENERATION WITH TDM PLAN**

<b>Land Use</b>	<b>AM Peak Hour Trips</b>	<b>PM Peak Hour Trips</b>
Project Trip Generation (from Table 4.14-7)	<del>4,345</del> 1,254	<del>1,282</del> 4,364
<i>TDM Vehicle Trip Reduction</i>	<del>148</del> 483	<del>141</del> 485
<b>Total Vehicle Trips with TDM Plan</b>	<b>1,106</b> <del>4,162</del>	<b>1,141</b> <del>4,176</del>

SOURCE: Fehr & Peers, 2018.

This modification does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.

As discussed in the comparative analysis in Chapter 2, the Project Applicant's Revised Project generates 33 percent fewer AM and PM peak hour trips than the Draft EIR Project. In addition, the Site TDM Plan prepared for the Revised Project (Appendix B to this document) would achieve reductions by up to approximately 20.7 compared to by up to 11 percent per the draft TDM Plan (Appendix F.5 to the Draft EIR). For informational purposes, the Revised Project with the potential Site TDM Plan reductions would generate 800 AM peak hour and 655 PM peak hour total vehicle trips. Also see response to comment 9-2.

- 10-7 Trip generation for the Project, excluding draft TDM reductions, was used to evaluate the Project and cumulative impacts, while the draft TDM Plan was included as a mitigation measure. Since the TDM Plan is not included in the project description and is not finalized nor approved by the City, it should not be included in a comparison of alternatives. In order to offer a balanced comparison with the Draft EIR Project, the Applicant's Revised Project, and other Project alternatives, trip generation, excluding TDM reductions, is shown in Table 5-2 in Chapter 5 of this Final EIR. The comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR or provide any new significant information.
- 10-8 This comment refers to a supplemental letter provided by the commenter concerning the Draft EIR's jobs/housing analysis. The commenter is referred to Master Response 1 in Chapter 5 of the Final EIR, which addresses the Draft EIR's consideration of housing demand and reflects the change to Table 4.11-3. The comment will also be transmitted to City decision makers for consideration

in their deliberations on the proposed Project. Additionally, to address comments raised, Section 4.11.7 *Jobs/Housing Balance* on pages 4.11-10 is revised as follows to correct the 2018 jobs/housing rate:

...In 2018, Redwood City is estimated to have 68,240 jobs (see Table 4.11-3) and approximately 30,693 housing units (see Table 4.11-2) — a jobs/housing ratio of 2.25 jobs to housing unit. Stated another way, in 2018, of the 68,240 jobs in Redwood City, 61 percent (41,688) are employed residents (see Table 4.11-3), reflecting a net daily inflow of 26,552 workers to the city.

10-9 The rationale for the prescribed mitigation, is outlined fully under Impact HYD-5 of the Draft EIR, beginning on page 4.8-16. As stated in the Draft EIR, to ensure the planned stormwater infrastructure would not exceed existing capacity with the proposed Project, a new redundant duty pump at the Oddstad Pump Station is required. Further, the proposed Project will continue to be the primary generator of storm drain flows to the Oddstad station. Future improvements to address drainage and flooding issues associated with the proposed Project will be formulated in accordance with City policy and applicable regulations to ensure that the Project would meet City standards that would not create offsite flow levels are greater than pre-development levels. If after an assessment of post-Project conditions with the Project applicant's implementation of the new redundant duty pumps, the City determines that the costs of the infrastructure work exceeded the proportionate share of flow levels attributable to the Project, the City shall credit the Project applicant.

Mitigation Measure HYD-5 on page 4.8-17 of the Draft EIR is updated as follows:

**Mitigation Measure HYD-5: Pump Station Infrastructure**

Prior to issuance of a certificate of occupancy for the Project, the Project sponsor shall install a new redundant duty pump at the Oddstad Pump Station and a new redundant duty pump at the Seaport Pump Station, pursuant to the *Inner Harbor Specific Plan Utilities Engineering Report* prepared by West Yost for the City of Redwood City, April 2015, and new stormwater mains to connect to the Seaport Boulevard Public Station, both in accordance with all applicable City of Redwood City Engineering Standards, to the satisfaction of the City. The Project sponsor shall receive a credit for costs of the infrastructure work above the proportionate share of potential new development attributable to the Project, as determined by City.

**Significance after Mitigation:** Less than Significant



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*Via Email*

March 8, 2019

Steven Turner, Planning Manager  
1017 Middlefield Road  
Redwood City 94063  
sturner@redwoodcity.org

Re: Comment on the Draft Environmental Impact Report for the Harbor View Project  
(SCH No. 2018012016)

Dear Mr. Turner:

I am writing on behalf of the Laborers International Union of North America, Local Union 261 and its members living in San Mateo County and the City of Redwood City (collectively "LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Harbor View Project, State Clearinghouse No. 2017082023 ("Project").

We have reviewed the DEIR with the assistance of expert biologist Shawn Smallwood, Ph.D., who has reviewed and prepared comments on the DEIR's discussion of impacts to biological resources. In addition to concerns about the Project's impacts on biological resources, our review also has identified serious shortcomings in the DEIR's analysis of the Project's human health impacts. The DEIR omits any discussion of indoor air emissions of formaldehyde and the cancer risks posed to workers at the new office building. The DEIR also fails to substantiate its conclusion that the Project's operation, including at least 8,090 vehicle trips per day will not have significant health risks on the adjacent inmates incarcerated at the Maple Street Correctional Center, especially the cumulative impacts when the Project's emissions are combined with the health risks posed by the adjacent Highway 101, the correctional center's and police station's on-site generators, and particulates emissions associated with the Union Pacific railroad tracks immediately to the west and east of the site operation and the Graniterock facility.

LIUNA urges the City to revise the DEIR to adequately describe, analyze, and mitigate the Project and its impacts. The revised DEIR should be recirculated to allow public review and comment. LIUNA further reserves its right to submit additional comments and evidence up until the date of the City Council's final decision on the Project. (*See Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109.)



## I. PROJECT DESCRIPTION

The Project includes the construction and operation of four office buildings, two parking structures, and an employee amenities building on a 27.08 acre site about a thousand feet from Steinberger Slough and Redwood Creek to the north and west and several hundred feet from existing salt ponds to the east. The four office buildings would extend to seven-stories in height with a total floor space area of 1,144,748 square feet. The office buildings would be 100 feet tall to rooftop and 123 feet to the top of each rooftop's trellis/tower. 3,855 parking spaces are proposed for the Project. The two proposed garages would be three and five stories high, respectively, with 3,099 total parking spaces. An additional 756 surface parking spaces also are proposed. The 35,000 square foot amenities building would be two stories in height. The buildings are proposed to be set within a campus including 4 acres of green space and landscaping on about 36 percent of the site with landscaped promenades between the buildings. The Project includes the demolition of the existing 67,000 square-foot vacant construction office building on the site, remediation of existing on-site contamination, the removal of about 106,000 tons of soil and the importation of 56,000 cubic yards of soil to add to existing fill materials to elevate the buildings above the existing flood plain and anticipated sea-level rise. It is anticipated that construction of the Project will take about two years to complete. The site currently is zoned Industrial and will required an amendment to both the General Plan and the Zoning Map to reflect commercial office uses.

## III. LEGAL STANDARDS

### A. EIR

CEQA requires that an agency analyze the potential environmental impacts of its proposed actions in an environmental impact report ("EIR") (except in certain limited circumstances). (See, e.g., Pub. Resources Code, § 21100.) The EIR is the very heart of CEQA. (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.) "The 'foremost principle' in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Communities for a Better Environment v. Cal. Resources Agency* (2002) 103 Cal.App.4th 98, 109 ("CBE v. CRA").)

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (14 Cal. Code Regs. ("CEQA Guidelines") § 15002(a)(1).) "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'" (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 564.) The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return." (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 ("Berkeley Jets"); *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.)

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Second, CEQA requires public agencies to avoid or reduce environmental damage when “feasible” by requiring “environmentally superior” alternatives and all feasible mitigation measures. (CEQA Guidelines, § 15002(a)(2) and (3); *See also Berkeley Jets*, 91 Cal.App.4th at 1354; *Citizens of Goleta Valley*, 52 Cal.3d at 564.) The EIR serves to provide agencies and the public with information about the environmental impacts of a proposed project and to “identify ways that environmental damage can be avoided or significantly reduced.” (CEQA Guidelines, §15002(a)(2).) If the project will have a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any unavoidable significant effects on the environment are “acceptable due to overriding concerns.” (Pub. Resources Code, § 21081; CEQA Guidelines, § 15092(b)(2)(A) & (B).)

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position. A ‘clearly inadequate or unsupported study is entitled to no judicial deference.’” (*Berkeley Jets*, 91 Cal.App.4th at p. 1355 (emphasis added), quoting, *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 391 409, n. 12.) As the court stated in *Berkeley Jets*, 91 Cal.App.4th at 1355:

A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.” (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal. App. 4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal. App. 4th 931, 946.)

More recently, the California Supreme Court has emphasized that:

When reviewing whether a discussion is sufficient to satisfy CEQA, a court must be satisfied that the EIR (1) includes sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises [citation omitted], and (2) makes a reasonable effort to substantively connect a project's air quality impacts to likely health consequences.

(*Sierra Club v. Cty. of Fresno* (2018) 6 Cal.5th 502, 510 (2018), citing *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 405.) “Whether or not the alleged inadequacy is the complete omission of a required discussion or a patently inadequate one-paragraph discussion devoid of analysis, the reviewing court must decide whether the EIR serves its purpose as an informational document.” (*Sierra Club v. Cty. of Fresno*, 6 Cal.5th at 516.) Although an agency has discretion to decide the manner of discussing potentially significant effects in an EIR, “a reviewing court must determine whether the discussion of a potentially significant effect is sufficient or insufficient, i.e., whether the EIR comports with its intended function of including ‘detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the

proposed project.” (6 Cal.5th at 516, citing *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1197, 22 Cal.Rptr.3d 203 (*Bakersfield*)). “The determination whether a discussion is sufficient is not solely a matter of discerning whether there is substantial evidence to support the agency’s factual conclusions.” (6 Cal.5th at 516.) Whether a discussion of a potential impact is sufficient “presents a mixed question of law and fact. As such, it is generally subject to independent review. However, underlying factual determinations—including, for example, an agency’s decision as to which methodologies to employ for analyzing an environmental effect—may warrant deference.” (*Sierra Club v. Cty. of Fresno*, 6 Cal.5th at 516.) As the Court emphasized:

[W]hether a description of an environmental impact is insufficient because it lacks analysis or omits the magnitude of the impact is not a substantial evidence question. A conclusory discussion of an environmental impact that an EIR deems significant can be determined by a court to be inadequate as an informational document without reference to substantial evidence.

(*Sierra Club v. Cty. of Fresno*, 6 Cal.5th at 514.)

In general, mitigation measures must be designed to minimize, reduce or avoid an identified environmental impact or to rectify or compensate for that impact. (CEQA Guidelines § 15370.) Where several mitigation measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. (*Id.* at § 15126.4(a)(1)(B).) A lead agency may not make the required CEQA findings unless the administrative record clearly shows that all uncertainties regarding the mitigation of significant environmental impacts have been resolved.

**IV. THE DEIR IS INCONSISTENT WITH CEQA’S REQUIREMENTS.**

**A. THE DEIR’S ASSERTION THAT NO HEALTH RISKS WILL RESULT FROM THE PROJECT’S EXTENSIVE DEMOLITION, GRADING AND CONSTRUCTION IS NOT SUPPORTED BY SUBSTANTIAL EVIDENCE.**

11-1

Although the DEIR includes a discussion of health risks posed by the Project’s two-year construction period based on a quantified health risk assessment, it fails to sufficiently address health risks from the Project’s long-term operations. Looking at emissions for the construction period alone, the DEIR states that the resulting cancer risk to inmates at the adjacent correctional center would be less than 1 in a million, which is below the BAAQMD’s significance threshold of 10 in a million. (DEIR, 4.2-22.) Unlike the analysis and discussion provided for the Project’s construction, the EIR fails to provide any sufficient analysis or discussion of the Project’s direct and cumulative health impacts resulting from its operation.

The DEIR only touches on operational health risks, stating that:

“The Project would result in vehicle trip generation that would primarily be gasoline powered and would not be a significant source of TACs. Impacts from Project operation

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are expected to be minimal due to the use of natural gas (not diesel) fired generators, which emit only negligible levels of TACs.”

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The Project’s 8,090 daily vehicle trips would be distributed over the surrounding roadway network and would not add to any one roadway segment. Given the absence of sensitive receptors in the area, the increase in traffic due to the Project would not result in significant exposure of receptors to substantial pollutant concentrations of TACs.”

(DEIR, p. 4.2-28.) As for cumulative health risks, the DEIR’s entire discussion states:

The Project’s incremental increase in localized TAC emissions resulting from new vehicle trips would be minor (Impact AIR-6). The Project would not contribute substantially to cumulative TAC emissions that could affect nearby existing and nearby proposed sensitive land uses. Therefore, the Project’s contribution to any cumulative air quality impacts related to exposure to TACs would be less than significant.

(DEIR, p. 4.2-30.)

The EIR’s cursory discussion of the Project’s direct and cumulative operational health impacts is insufficient and fails to “enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises[.]” (*Sierra Club v. Cty. of Fresno*, 6 Cal.5th 502, 510.) Alternatively, by failing to provide any analytical basis for the conclusion that 8,090 vehicles per day, never mind delivery trucks, would not have significant health impacts on inmates about one hundred feet away is not supported by substantial evidence.

OEHHA recommends a health risk assessment of a project’s operational emissions for projects that will be in place for more than 6 months. (OEHHA, February 2015, pp. 8-6, 8-15.) Projects lasting more than 6 months should be evaluated for the duration of the project, and an exposure duration of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident (MEIR). (*Id.*) The Project would last at least 30 years and certainly much longer than six months. The DEIR does not provide a sufficient explanation for the conclusion that well over 8,000 vehicles and trucks driving on a daily basis near locked-up inmates would not result in emissions with health risks to those inmates greater than 10 in a million.

Likewise, the DEIR fails to provide a sufficient discussion of the Project’s cumulative health risks during its operation. The correction center is virtually surrounded by toxic air contaminant sources. Route 101 is about 200 feet from the most sensitive receptor. Various generators are located nearby, including one operated by the correction center and another by the City. Railroad tracks run between the Project and the correction center as well as on the east side of the Project. Adding in the incremental cancer risk that likely exists for the over 8,000 vehicles that will be driving through the Project site every day would very likely contribute to the

cumulative health risk to the inmates, i.e. a cancer risk exceeding 100 in a million. None of this is seriously considered in the DEIR.

In order for the DEIR to be sufficient under CEQA, the cavalier assertions regarding the Project’s health impacts on the adjacent inmates must be substantiated with a thorough health risk assessment and discussion in the DEIR. The City and DEIR’s conclusory assertions fail as a matter of law.

**B. THE DEIR FAILS TO ESTABLISH AN ACCURATE BASELINE FOR SENSITIVE BIOLOGICAL RESOURCES AND FAILS TO DISCLOSE AND MITIGATE IMPACTS OF THE PROJECT ON NUMEROUS SENSITIVE SPECIES.**

Expert biologist Shawn Smallwood, Ph.D., has reviewed the DEIR’s discussion of biological resources. Drawing on his familiarity with the project area and decades of studying and surveying many of the species encountered at the site, Dr. Smallwood has prepared a critique of the DEIR, pointing out numerous shortcomings in the baseline assessment of the presence of species at the site, failures to evaluate impacts that will result from the Project, and numerous instances where the DEIR’s assertions are insufficient or not supported by substantial evidence.

**1. The DEIR Fails To Adequately Address The Project’s Impacts On Wildlife Resulting from Bird Strikes.**

11-2

The DEIR mentions the likely impacts to birds caused from collisions with the Project’s buildings. As the DEIR notes:

Development of the Project may increase the risk of bird collisions over that posed by existing structures. For new buildings, reflective building façades that are generally located in a clear flight path from water features can create hazards for birds. Other potential feature-related hazards new development can pose to birds include glass courtyards, transparent building corners, or clear glass walls on rooftops or balconies. When considering the Project site location along a known migratory route, proximity to the bay, the large area of exterior glass surfaces, and the presence of frequent shoreline fog which can adversely affect avian navigational awareness, the Harbor View Project development could increase the risk of avian collisions. If the buildings’ exterior surfaces were to be reflective and not incorporate elements to avoid or minimize avian collisions, it is foreseeable that an unknown number of songbirds or waterbirds could collide with new structures and could result in injury or fatality.

(DEIR, p. 4.3-33.) This discussion of the Project is not sufficient to describe the Project’s impacts on birds colliding with the building’s largely glass facades. By framing this impact as a mere possibility, the DEIR misrepresents the Project’s potential impacts and fails to give any sense of the magnitude of this potential impact.

Full disclosure of the potential impact on wildlife of window collisions is especially important because “[w]indow collisions are often characterized as either the second or third largest source of human-caused bird mortality.” (Dr. Smallwood Comments, p. 9.) As a preliminary matter, a proper DEIR for the Project should include “specific details of window placements, window extent, types of glass, and anticipated interior and exterior landscaping and lighting.” (*Id.* at p. 7.) The DEIR then should discuss the likely magnitude of bird collisions with the Project as well as the particular species that would be most likely to collide with the Project and evaluate the direct and cumulative impacts of those bird fatalities.

Dr. Smallwood reviewed a number of studies in order to calculate the number of bird collisions per m<sup>2</sup> of glass windows and window curtain walls per year. (*Id.*, p. 7.) According to his calculations, the Project’s estimated 28,550 m<sup>2</sup> of glass windows and window curtain walls, would result in an estimated 2,170 bird deaths per year. (*Id.* at p. 12.) As Dr. Smallwood also points out, the species present in that area which are prone to collisions with buildings would include a number of species listed as Bird Species of Conservation Concern, California Species of Special Concern, Taxa to Watch List or by Section 3503.5. These would include, for example, Alameda song sparrow, Allen’s hummingbird, Yellow warbler, San Francisco common yellowthroat, Cooper’s hawk, and Red-tailed hawk. (*Id.*, p. 4; *Id.*, p. 7 (“Seven special-status species known to occur in the immediate project area (Table 1) are known to collide with windows in the area (Kahle et al. 2016), and several others have been documented as collision victims elsewhere.”). Aspects of the Project’s design will actually exacerbate the number of birds that will be killed by collisions with the Project’s structures. In addition to the approximately 28,550 m<sup>2</sup> of windows and window curtain walls, the Project is “made even more dangerous to birds by canopies, sunshades, alcoves, angles, and transparent building corners.” (*Id.*, p. 7.) “Some of the windows would reflect outdoor landscaping including trees and shrubs, which could lure birds toward false cover.” (*Id.*) The project’s proximity to San Francisco Bay, the extent of collision surface proposed, the exacerbating features identified by Dr. Smallwood, and the estimated number of bird deaths calculated by Dr. Smallwood each underscore the DEIR’s cursory discussion and lack of “sufficient detail to enable those who did not participate in its preparation to understand and to consider meaningfully the issues the proposed project raises[.]” (*Sierra Club v. Cty. of Fresno*, 6 Cal.5th 502, 510.)

To make matters worse, despite acknowledging the likely impact of bird collisions with the Project, the DEIR merely references the federal Migratory Bird Treaty Act as magically addressing those potential impacts. As the DEIR states:

Due to recent changes to the federal MBTA, the incidental “take” of migratory bird species is not prohibited by the MBTA or Fish and Game Code (USDOI, 2017; USFWS, 2018). Because the take of migratory birds is not prohibited by CDFW or by the MBTA based on federal guidance, potential impacts to avian species from collision with new buildings would be less than significant with no mitigation required.

(DEIR, p. 4.3-33.) The DEIR then concludes that no mitigation to address bird collisions is required by the Project. (*Id.*) It does offer up a consolation suggestion, stating vaguely that:

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Nonetheless, it is recommended that the Project applicant incorporate bird safe measures into the building design that would reduce the potential for avian collisions. These include, but not limited to, the use of exterior glass treatments (use of non-reflective glass through tinting, glazing and/or fritting that reduces transmission of light out of the building), as well as exterior façade and lighting treatments.

(*Id. see also id.*, p. 3-13 (“Aspects of the proposed building design are consistent with bird safe design guidelines. These included glazing options, building and fenestration strategies, as well as lighting strategies”).

Merely stating a project will comply with another agency’s regulations is not sufficient to satisfy CEQA’s disclosure and analysis requirements. *See Kings Co v. Hanford* (1990)221 CA3d 692, 712-718 (agency erred by “wrongly assuming that, simply because the smokestack emissions would comply with applicable regulations from other agencies regulating air quality, the overall project would not cause significant effects to air quality.”); *Citizens for Non-Toxic Pest Control v. Dept. Food & Agr.* (1986) 187 CA3d 1575, 1587-88 (state agency may not rely on registration status of pesticide to avoid CEQA review); *Sundstrom v. Cty. of Mendocino* (1988) 202 Cal.App.3d 296, 309 (“Having no ‘relevant data’ pointing to a solution of the sludge disposal problem, the County evaded its duty to engage in a comprehensive environmental review by approving the use permit subject to a condition requiring future regulatory compliance”); *See Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 442 n. 8 (lead agency cannot refrain from considering means of exercising its own regulatory power simply because another agency has general authority over the impacted natural resource). Especially where, as here, an expert comment indicates that significant impacts will result despite the presence of the Migratory Bird Treaty Act, the City is obligated to address these potential impacts in an EIR, not by mere reference to a federal law that does not appear to even apply to the issue.

The DEIR’s failure to sufficiently disclose and address this impact, coupled with its complete failure to identify and require implementation of mitigation measures, is insufficient under CEQA. Moreover, substantial evidence provided by Dr. Smallwood demonstrates that the Project will have significant impacts for which mitigation measures must be formulated and, if not able to be mitigated, subjected to a statement of overriding considerations.

Relatedly, the DEIR relies on the deficient bird collision discussion and its non-existent mitigation to address the impacts of glare and lighting on birds as well. The DEIR states “[t]his EIR conducts a thorough analysis of the potential effects of nighttime lighting or use of certain building materials that can cause glare on birds in Section 4.3, *Biological Resources*. Mitigation measures are identified, the implementation of which will ensure the potential effect is less than significant.” (DEIR, p. 4.1-18.) Because in fact there are no mitigations identified and no analysis of lighting and glare on birds, this impact also is not sufficiently addressed or mitigated by the DEIR. The Project’s lighting impacts also extend to other wildlife:

Artificial lighting causes a variety of substantial impacts on a variety of wildlife species (Rich and Longcore 2006). At the site of the proposed project I am particularly concerned about the project's lighting impacts on wildlife residing in Bay waters, including harbor seals, California brown pelicans, double-crested cormorants, and other species. I am also concerned about the project's lighting impacts on salt marsh harvest mouse in nearby pickleweed stands. Added lighting could cause displacement or altered activity patterns of at least some species.

(Smallwood Comments, p. 18.)

In order to mitigate the impact of the window collisions on bird species, Dr. Smallwood has suggested several possible mitigation measures. Dr. Smallwood suggests: (1) marking the windows (e.g. decals, film, fritted glass); (2) managing outdoor landscape to reduce reflection of vegetation; (3) managing indoor landscape; and (4) managing nocturnal lighting. (Ex. A, p. 14.) For mitigation measures involving the siting and design of the Project, Dr. Smallwood suggests: (1) deciding on the location of structures; (2) deciding on the façade and orientation of structures; (3) selecting types and sizes of windows; (4) minimizing transparency through two parallel façades; (5) minimizing views of interior plants; and (6) landscaping so as to increase distance between windows and vegetation. (*Id.*) Dr. Smallwood also suggests that the City also look to the guidelines developed by the American Bird Conservancy and the City of San Francisco to minimize injuries and fatalities to bird species. (*Id.* at p. 15.)

Even with Dr. Smallwood's proposed mitigations, however, it is not likely that the Project can fully mitigate this potentially significant impact. Only a robust discussion in a draft EIR subjected to public review and comment would indicate the extent of the impact and the necessary mitigation measures and fully disclose unmitigated impacts the Project may cause.

## **2. The EIR fails to identify the likely presence of sensitive and other wildlife species at the Project site.**

11-3

Dr. Smallwood points out the absence of any detection level surveys that would provide actual evidence of the presence or absence of species at the Project site. Based on his expert opinion and his observations at the Project site, there has been no effort to detect whether or not numerous sensitive species are in harm's way from the Project. Dr. Smallwood identifies 56 vertebrate species of wildlife likely to be adversely affected by the project, while the DEIR only acknowledges 18 of those species. (Smallwood Comments, p. 2)

Establishing an accurate baseline is the sine qua non to adequately analyzing and mitigating the significant environmental impacts of the Project. (*See* CEQA Guidelines, § 15125(a); *Save Our Peninsula*, 87 Cal.App.4th at 121-123.) Unfortunately, the DEIR's failure to investigate and identify the occurrences of sensitive biological resources at the Project site results in a skewed baseline. Such a skewed baseline ultimately "mislead(s) the public" by engendering inaccurate analyses of environmental impacts, mitigation measures and cumulative



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impacts for biological resources. (See *San Joaquin Raptor Rescue Center*, 149 Cal.App.4th at 656; *Woodward Park Homeowners*, 150 Cal.App.4th at 708-711.)

The various preconstruction surveys called for in the DEIR do nothing to rectify the DEIR's numerous shortcomings in disclosing impacts. Nor would those surveys to be conducted just prior to construction stand-in as a proper baseline from which to disclose and evaluate impacts. (See Smallwood Comment, p. 20.)

By failing to conduct any surveys and disregarding the absence of key species from the project site, ignoring numerous other species likely to be present, the DEIR fails to establish and otherwise skews the entire biological resources baseline for the Project. This entire section should be redone, starting with properly timed, truly focused, detection surveys of the entire site and the presence of birds and other wildlife.

### 3. The DEIR fails to address the Project's impacts on wildlife movement.

11-4

The DEIR's cursory discussion of potential impacts to wildlife movement is insufficient. As Dr. Smallwood explains:

City of Redwood City (2019:4.3-32) committed a mere two sentences to potential project impacts on wildlife movement in the region. According to the City, the project site is located within a sensitive natural area, and therefore the project has low potential to adversely affect wildlife corridors or nursery sites. This conclusion does not follow logically from the premise; the conclusion makes no sense.

The project site is located at the interface of developed land and Bay waters and marsh. Birds fly along this interface for migration, dispersal, home range patrol and daily foraging. City of Redwood City (2019:4.3-320) acknowledges this, "...birds typically follow coastlines, rivers, and mountain ranges in their migratory passages from wintering to breeding grounds and back again." Erecting multiple buildings on this coastline would pose a barrier to bird movement. It would also cast artificial light into potential nursery areas, thereby degrading them.

(Smallwood Comments, pp. 18-19.) Dr. Smallwood continues:

A site such as the proposed project site is critically important for wildlife movement because it borders urban sprawl, forcing more volant wildlife to use the site as stop-over and staging habitat during migration, dispersal, and home range patrol (Warnock 2010, Taylor et al. 2011, Runge et al. 2014). The project would cut wildlife off from stop-over and staging habitat, and would therefore interfere with wildlife movement in the region.

(*Id.*, p. 19.) The DEIR’s non-substantive discussion of this potential impact identified by Dr. Smallwood is inconsistent with CEQA as a matter of law.

**4. The DEIR fails to discuss the Project’s likely impacts to wildlife from increased traffic.**

11-5

Dr. Smallwood describes the significant role increased traffic plays in wildlife mortality. (Smallwood Comments, pp. 6-7.) Despite this scientific evidence of wildlife impacts from traffic, no attempt is made by the DEIR to identify or evaluate this impact from the project’s increased traffic. As Dr. Smallwood points out:

According to City of Redwood City (2019), the project would generate 8,090 net new average daily automobile trips. These trips would extend the project’s impacts on wildlife well beyond the project footprint, because cars crush and kill wildlife attempting to cross California’s roadways (Shilling et al. 2017). Vehicle collisions have accounted for the deaths of many thousands of reptile, amphibian, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Increased use of existing roads will increase wildlife fatalities (see Figure 7 in Kobylarz 2001). Members of some special-status species that are likely absent from the project site would be killed by traffic generated by the project, including Federally Threatened California red-legged frog (*Rana draytonii*) and California Species of Concern American badger (*Taxidea taxus*). Nothing about these likely impacts is addressed in City of Redwood City (2019).

(Smallwood Comments, p. 6.) As a result, the DEIR is deficient as a matter of law.

**5. No meaningful discussion of the Project’s cumulative effects on wildlife is included in the DEIR.**

11-6

Recognizing that several projects may together have a considerable impact, CEQA requires an agency to consider the “cumulative impacts” of a project along with other projects in the area. (§ 21083(b); CEQA Guidelines §15355(b).) If a project may have cumulative impacts, the agency must prepare an EIR, since “a project may have a significant effect on the environment if “[t]he possible effects of a project are individually limited but cumulatively considerable.” (CBE, 103 Cal.App.4th at 98, 114; *Kings County Farm Bur.*, 221 Cal.App.3d at 721.) It is vital that an agency assess “the environmental damage [that] often occurs incrementally from a variety of small sources . . .” (*Bakersfield Citizens For Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1214 (“*Bakersfield Citizens*”))

Rather than assess the cumulative wildlife impacts of the Project, the DEIR states that cumulative impacts are addressed by assuming that “[c]umulative developments, particularly those in proximity to water and natural resources, have been or will be adequately assessed for their potential to result in significant environmental effects and would be required to implement adopted mitigation measures to reduce such impacts.” (DEIR, p. 4.3-35.) As Dr. Smallwood

points out, “[t]his argument implies that cumulative effects are really just residual, unmitigated impacts. If this implication was correct, then CEQA would not have included a requirement for cumulative effects analysis because mitigation for project-specific impacts would always negate cumulative effects. The EIR needs to be revised so that it includes an adequate cumulative effects analysis.” (Smallwood Comment, p. 19.). Likewise, the DEIR once again incorrectly attempts to rely on existing regulations as a proxy for analyzing and mitigating the Project’s cumulative impacts. (DEIR, p. 4.3-36 (“Further, environmentally protective laws and regulations have been applied with increasing rigor since the early 1970s and include the CESA, FESA, and the CWA, as described earlier in this section.”) As discussed above, the City cannot comply with CEQA merely by assuming compliance with existing regulations or laws. (*See supra*, p. 8.)

As a result, the DEIR’s discussion of cumulative wildlife impacts is entirely deficient.

**C. THE DEIR FAILS TO ADDRESS THE POTENTIAL ADVERSE IMPACTS OF THE PROJECT ON INDOOR AIR QUALITY.**

11-7

The DEIR entirely omits any consideration of the Project’s emissions of indoor air pollutants and the resulting health impact to workers employed in the office buildings. Formaldehyde is a known human carcinogen. Many composite wood products typically used in office building construction contain formaldehyde-based glues which off-gas formaldehyde over a very long time period. Likewise, it is eminently foreseeable that furnishings to be used within these buildings will be made of similar off-gassing materials. The primary source of formaldehyde indoors is composite wood products manufactured with urea-formaldehyde resins, such as plywood, medium density fiberboard, and particle board. These materials are commonly used in residential and office building construction for flooring, cabinetry, baseboards, window shades, interior doors, and window and door trims. Given the prominence of materials with formaldehyde-based resins that will be used in constructing the Project and in furnishing the buildings, there is a significant likelihood that the Project’s emissions of formaldehyde to air will result in very significant cancer risks to future workers in the buildings. Even if the materials used within the buildings comply with the Airborne Toxic Control Measures (ATCM) of the California Air Resources Board (CARB), significant emissions of formaldehyde may still occur.

The proposed office buildings will have significant impacts on air quality and health risks by emitting cancer-causing levels of formaldehyde into the air that will expose workers to cancer risks potentially in excess of BAAQMD’s threshold of significance for cancer health risks of 10 in a million. Likewise, when combined with the risks posed by the nearby highway, railroad tracks, the Graniterock manufacturing plant, and other sources, the health risks inside the project may exceed BAAQMD's cumulative health risk threshold of 100 cancers in a million. Currently, the City does not have any idea what risks will be posed by formaldehyde emissions from the Project or the residences.

The City has a duty to investigate issues relating to a project’s potential environmental impacts. (*See County Sanitation Dist. No. 2 v. County of Kern*, (2005) 127 Cal.App.4th 1544, 1597–98. [“U]nder CEQA, the lead agency bears a burden to investigate potential

environmental impacts.”]) “If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record. Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences.” (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311.) Given the lack of analysis conducted by the City on the health risks posed by emissions of formaldehyde from the Project, such emissions from the Project may pose significant health risks. As a result, the City must include an analysis and discussion in the DEIR which discloses and analyzes the health risks that the Project’s formaldehyde emissions may have on future workers and identifies appropriate mitigation measures. Until that occurs, the DEIR is insufficient in disclosing this important impact.

**V. CONCLUSION**

For the foregoing reasons, LIUNA and its members urge the City to prepare and recirculate a revised DEIR addressing the above shortcomings. Thank you for your attention to these comments. Please include this letter and all attachments hereto in the record of proceedings for this project.

Sincerely,



Michael R. Lozeau  
Lozeau Drury LLP  
Attorneys for LIUNA

# EXHIBIT A

Shawn Smallwood, PhD  
3108 Finch Street  
Davis, CA 95616

Lisa Costa Sanders, Principal Planner  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063

6 March 2019

RE: Harbor View Project

Dear Ms. Sanders,

I write to comment on the City of Redwood City's (2019) Draft Environmental Impact Report prepared for the proposed Harbor View Project, which I understand would consist of four office buildings, an amenities building and two parking garages.

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I subsequently worked for four years as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, habitat restoration, interactions between wildlife and human infrastructure and activities, conservation of rare and endangered species, and on the ecology of invading species. I perform research on wildlife mortality caused by wind turbines, electric distribution lines, agricultural practices, and road traffic. I authored numerous papers on special-status species issues, including "Using the best scientific data for endangered species conservation" (Smallwood et al. 1999), and "Suggested standards for science applied to conservation issues" (Smallwood et al. 2001). I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society and the Raptor Research Foundation, and I've been a part-time lecturer at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for thirty-three years, including at many proposed project sites. My CV is attached.

### **BIOLOGICAL IMPACTS ASSESSMENT**

I saw no evidence in the DEIR that any biological resource surveys were performed in support of the EIR. Without field surveys, and most especially without detection surveys for special-status species of wildlife, Redwood City lacks foundation for species presence/absence determinations. Its Table of species' occurrence likelihoods is founded on guesswork, and the guesses tend to err in favor of concluding no project impacts.

Whereas I identified 56 vertebrate species of wildlife likely to be adversely affected by the project, City of Redwood City addressed only 18 (32%) of them. Without visiting the site, the City's consultant pigeon-holed species habitat needs into narrow portions of the environment that do not occur on the project site, thereby justifying determinations of absence or low likelihood of occurrence for 13 (72%) of the 18 species addressed.

However, species Redwood City determined absent, including double-crested cormorant and peregrine falcon, have been reported repeatedly on eBird, indicating routine use of the project area. Peregrine falcons have been seen recently, and photos of them posted on eBird (Figure 1). City of Redwood City (2019) absence determinations are flawed and wrong.

In another example, City of Redwood City (2019:4.3-7) claims the project site is located outside the geographic range of Alameda song sparrow. According to Shuford and Gardali (2008), the project is within the geographic range of this subspecies of song sparrow.

City of Redwood City (2019) implies that nesting habitat is unavailable on the project site for multiple species, thereby justifying low occurrence potential and low likelihood for significant impacts. This approach inappropriately separates nesting habitat from some other types of habitat defined by the consultants, and only pretends that animals divide up their habitats as distinctly for nesting versus other purposes. In reality, there is no nesting without foraging, and no foraging without nesting. Habitat is defined as that portion of the environment used by a species, and that use is going to include breeding, foraging, and cover. Some portion of habitat is used for nest sites, but nest sites cannot succeed without access to forage and cover during all seasons of the year.

City of Redwood City (2019) implies that they know whether habitat quality is lesser or greater on the project site than elsewhere. However, habitat quality is measured by population performance variables such as population size, productivity, survivorship, gene flow, genetic diversity, and population persistence. City of Redwood City (2019) measured none of these variables for any species, so cannot know whether habitat quality is low for any species on the project site. The only way to know whether and how the project site is used by wildlife is to perform detection surveys, which are surveys with protocols or guidelines that were formulated by species' experts for detecting the species. Otherwise, the appropriate approach for assessing occurrence potential is to err on the side of caution by assuming each species is present.

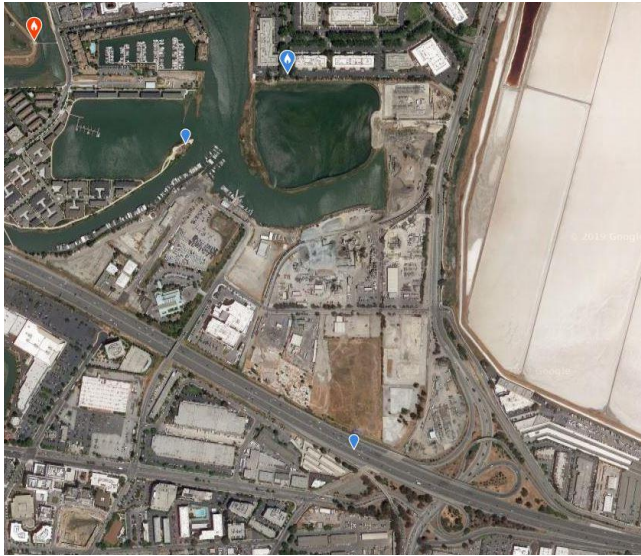
**Table 1.** Special status species potentially occurring in the project area, including the City of Redwood City's (2019) occurrence likelihood assessment, and my assessment, where eBird posts refer to eBird (<https://eBird.org>) records of birds seen on or near the proposed project site. I also recorded whether bird species were found as window collision victims in nearby study (Kahle et al. 2016).

Species	Scientific name	Status <sup>1</sup>	DEIR	Occurrence potential	Window victims
Pallid bat	<i>Antrozous pallidus</i>	SSC, WBWG	Moderate	Possible	
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	SSC, WBWG	Moderate	Possible	
Hoary bat	<i>Lasiurus cinereus</i>	WBWG	Moderate	Possible	
Western red bat	<i>Lasiurus blossevillii</i>	SSC	No mention	Possible	
Fringed myotis	<i>Myotis thysanodes</i>	SSC, WBWG	No mention	Possible	
Long-eared myotis	<i>Myotis evotis</i>	WBWG	No mention	Possible	
Small-footed myotis	<i>Myotis ciliolabrum</i>	WBWG	No mention	Possible	
Pacific harbor seal	<i>Phoca vitulina richardsi</i>	MMPA	Moderate	Nearby	
California sea lion	<i>Zalophus californianus</i>	MMPA	Moderate	Nearby	
Salt marsh harvest mouse	<i>Reithrodontomys raviventris</i>	FE, CE, CFP	Low	Nearby	
Brant	<i>Branta bernicla</i>	SSC2	No mention	eBird posts	No
Aleutian cackling goose	<i>Branta hutchinsonii leucopareia</i>	TWL	No mention	eBird posts	No
California brown pelican	<i>Pelicanus occidentalis californicus</i>	CFP	No mention	eBird posts	No
American white pelican	<i>Pelicanus erythrorhynchos</i>	SSC1	No mention	eBird posts	No
Double-crested cormorant	<i>Phalacrocorax auritus</i>	TWL	Absent	eBird posts	No
Long-billed curlew	<i>Numenius americanus</i>	TWL, BCC	No mention	eBird posts	No
Whimbrel	<i>Numenius phaeopus</i>	BCC	No mention	eBird posts	No
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	FT, BCC, SSC3	Absent	eBird posts	No
California gull	<i>Larus californicus</i>	TWL	No mention	eBird posts	No
California least tern	<i>Sternula antillarum browni</i>	FE, CE, CFP	Low	eBird posts	No
Caspian tern	<i>Hydropogone caspia</i>	TWL	No mention	eBird posts	No
Marbled godwit	<i>Limosa fedoa</i>	BCC	No mention	eBird posts	No
Red knot	<i>Calidris canutus</i>	BCC	No mention	eBird posts	No
Short-billed dowitcher	<i>Limnodromus griseus</i>	BCC	No mention	eBird posts	No
Osprey	<i>Pandion haliaetus</i>	TWL, CDFW 3503-5	No mention	eBird posts	No
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA, BCC, CE, CFP	No mention	eBird posts	No
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA, BCC, CFP	No mention	eBird posts	No



Species	Scientific name	Status <sup>1</sup>	DEIR	Occurrence potential	Window victims
Red-tailed hawk	<i>Buteo jamaicensis</i>	CDFW 3503.5	No mention	eBird posts	Yes
Ferruginous hawk	<i>Buteo regalis</i>	TWL, CDFW 3503.5	No mention	eBird posts	No
Red-shouldered hawk	<i>Buteo lineatus</i>	CDFW 3503.5	No mention	eBird posts	No
Sharp-shinned hawk	<i>Accipiter striatus</i>	CDFW 3503.5, TWL	No mention	eBird posts	No
Cooper's hawk	<i>Accipiter cooperi</i>	CDFW 3503.5, TWL	No mention	eBird posts	Yes
Northern harrier	<i>Circus cyaneus</i>	SSC3, CDFW 3503.5	Low	eBird posts	No
White-tailed kite	<i>Elanus leucurus</i>	CFP, TWL, CDFW 3503.5	Low	eBird posts	No
American kestrel	<i>Falco sparverius</i>	CDFW 3503.5	No mention	eBird posts	No
Merlin	<i>Falco columbarius</i>	CDFW 3503.5, TWL	No mention	eBird posts	No
Peregrine falcon	<i>Falco peregrinus</i>	BCC, CE, CFP, CDFW 3503.5	Absent	eBird posts	No
Ridgeway's rail	<i>Rallus o. obsoletus</i>	FE, CE, CFP	Low	eBird posts	No
California black rail	<i>Rallus jamaicensis coturniculus</i>	BCC, CFP	Low	eBird posts	No
Great-horned owl	<i>Bubo virginianus</i>	CDFW 3503.5	No mention	eBird posts	No
Short-eared owl	<i>Asio flammeus</i>	SSC3	Low	eBird posts	No
Western screech-owl	<i>Megascops kennicotti</i>	CDFW 3503.5	No mention	eBird posts	No
Burrowing owl	<i>Athene cucularia</i>	BCC, SSC2	Low	eBird posts	No
Barn owl	<i>Tyto alba</i>	CDFW 3503.5	No mention	eBird posts	No
Vaux's swift	<i>Chaetura vauxi</i>	SSC2	No mention	eBird posts	No
Costa's hummingbird	<i>Calypte costae</i>	BCC	No mention	eBird posts	Yes
Allen's hummingbird	<i>Selasphorus sasin</i>	BCC	No mention	eBird posts	Many
Nuttall's woodpecker	<i>Picoides nuttalli</i>	BCC	No mention	eBird posts	No
Olive-sided flycatcher	<i>Contopus cooperi</i>	SSC2	No mention	eBird posts	No
Oak titmouse	<i>Baeolophus inornatus</i>	BCC	No mention	eBird posts	No
Loggerhead shrike	<i>Lanius ludovicianus</i>	BCC, SSC2	No mention	eBird posts	No
Yellow warbler	<i>Setophaga petechia</i>	BCC, SSC2	No mention	eBird posts	Yes
San Francisco common yellowthroat	<i>Geothlypis trichas sinuosa</i>	BCC, SSC3	Low	eBird posts	Yes
Alameda song sparrow	<i>Melospiza melodia pusillula</i>	SSC2	Low	eBird posts	Yes
Tricolored blackbird	<i>Agelaius tricolor</i>	CT, BCC	No mention	eBird posts	No
Yellow-headed blackbird	<i>X. xanthocephalus</i>	SSC3	No mention	eBird posts	No

<sup>1</sup> Listed as FE or FT federal Endangered or Threatened, BCC = U.S. Fish and Wildlife Service Bird Species of Conservation Concern, CE or CT = California endangered or threatened, CFP = California Fully Protected (CDFG Code 4700), CDFW 3503.5 = California Department of Fish and Wildlife Code -- Birds of prey, and SSC1, SSC2 and SSC3 = California Species of Special Concern priorities 1, 2 and 3, respectively, and TWL = Taxa to Watch List (Shuford and Gardali 2008), and WBWG = Western Bat Working Group.



**Figure 1.** eBird records (teardrops, where red = recent) of Peregrine falcon and photo of one seen recently.

## ROAD MORTALITY

According to City of Redwood City (2019), the project would generate 8,090 net new average daily automobile trips. These trips would extend the project's impacts on wildlife well beyond the project footprint, because cars crush and kill wildlife attempting to cross California's roadways (Shilling et al. 2017). Vehicle collisions have accounted for the deaths of many thousands of reptile, amphibian, mammal, bird, and arthropod fauna, and the impacts have often been found to be significant at the population level (Forman et al. 2003). Increased use of existing roads will increase wildlife fatalities (see Figure 7 in Kobylarz 2001). Members of some special-status species that are likely absent from the project site would be killed by traffic generated by the project, including Federally Threatened California red-legged frog (*Rana draytonii*) and California Species of Concern American badger (*Taxidea taxus*). Nothing about these likely impacts is addressed in City of Redwood City (2019).

Across North America traffic impacts have taken devastating tolls on wildlife (Forman et al. 2003). In Canada, 3,562 birds were estimated killed per 100 km of road per year (Bishop and Brogan 2013), and the US estimate of avian mortality on roads is 2,200 to 8,405 deaths per 100 km per year, or 89 million to 340 million total per year (Loss et al. 2014). Local impacts can be more intense than nationally.

Just this past winter, 2,695 California newts were counted dead along a 6-mile stretch of Alma Bridge Road in Los Gatos (Lisa M. Krieger, Bay Area News Group, 19 February 2019). This stretch of road, along with many others, is well within the range of potential destinations of vehicle trips extending to and from the project site.

In a recent study of traffic-caused wildlife mortality, investigators found 1,275 carcasses of 49 species of mammals, birds, amphibians and reptiles over 15 months of searches along a 2.5 mile stretch of Vasco Road in Contra Costa County, California (Mendelsohn et al. 2009). Using carcass detection trials performed on land immediately adjacent to

the traffic mortality study (Brown et al. 2016) to adjust the found fatalities for the proportion of fatalities not found due to scavenger removal and searcher error, the estimated traffic-caused fatalities was 12,187. This fatality estimate translates to a rate of 3,900 wild animals per mile per year killed along 2.5 miles of road in 1.25 years. In terms comparable to the national estimates, the estimates from the Mendelsohn et al. (2009) study would translate to 243,740 animals killed per 100 km of road per year, or 29 times that of Loss et al.'s (2014) upper bound estimate and 68 times the Canadian estimate. An analysis is needed of whether increased traffic on roads in and around Redwood City would similarly result in intense local impacts on wildlife.

Wildlife roadkill is not randomly distributed, so can be predicted. Causal factors include types of roadway, human population density, and temperature (Chen and Wu 2014), as well as time of day and adjacency and extent of vegetation cover (Chen and Wu 2014, Bartonička et al. 2018), and intersections with streams and riparian vegetation (Bartonička et al. 2018). For example, species of mammalian Carnivora are killed by vehicle traffic within 0.1 miles of stream crossings >40 times other than expected (K. S. Smallwood, 1989-2018 unpublished data). These factors also point the way toward mitigation measures, which should be formulated in a revised EIR.

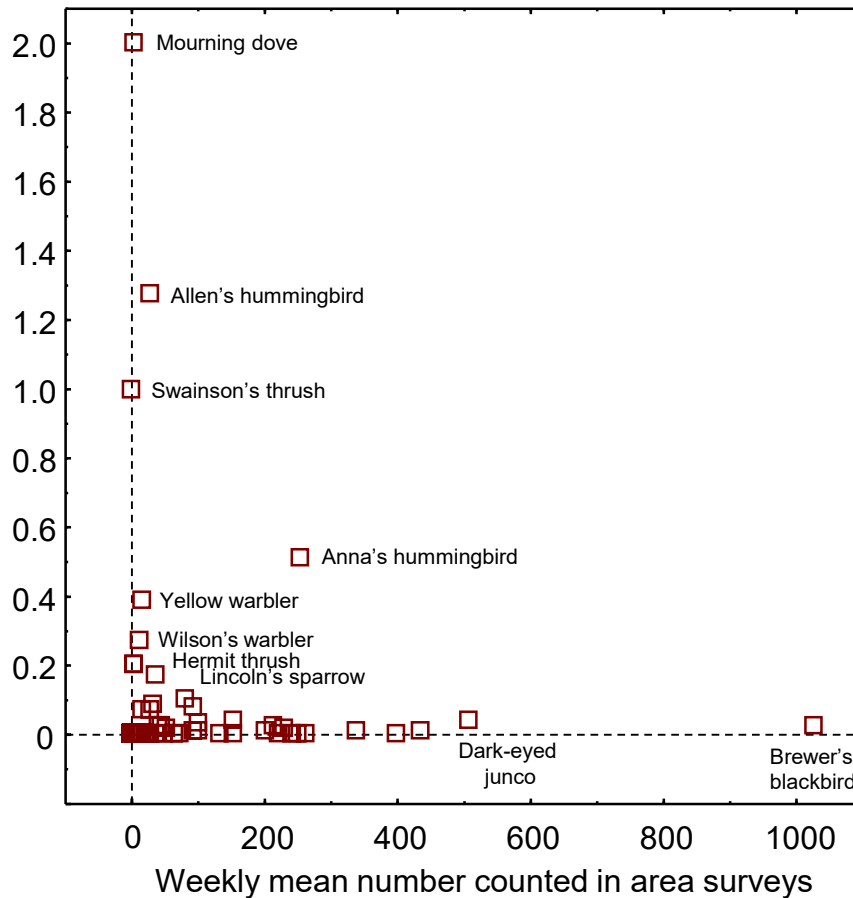
## WINDOW COLLISIONS

The proposed project would be located along the coastline of San Francisco Bay, next to Bay waters, the outlet of Redwood Creek, multiple sloughs, pickleweed marsh, and salt evaporation ponds. In this environment, which is likely heavily trafficked by birds, the project would add 7 multi-story buildings amidst landscaped trees and shrubs sought by birds. These buildings would be sided by about 28,550 m<sup>2</sup> of windows and window curtain walls, made even more dangerous to birds by canopies, sunshades, alcoves, angles, and transparent building corners. Whereas, the DEIR acknowledges the project's collision hazard to flying birds (City of Redwood City 2019:4.3-33), it dismisses these impacts as less than significant because the federal government has recently relaxed protections under the Migratory Bird Treaty Act. This conclusion is inappropriate because many species of birds remain protected under California statutes, and some species are also protected by federal statutes other than the MBTA. The EIR needs to be revised to include specific details of window placements, window extent, types of glass, types and degree of fritting, and anticipated interior and exterior landscaping and lighting. A revised EIR is needed to analyze the project's potential collision impacts on birds, and it is needed to appropriately mitigate these impacts.

Some of the windows would reflect outdoor landscaping including trees and shrubs, which could lure birds toward false cover. The types of windows proposed and their orientations and interactions with landscaping need to be examined for hazards to birds. Seven special-status species known to occur in the immediate project area (Table 1) are known to collide with windows in the area (Kahle et al. 2016), and several others have been documented as collision victims elsewhere. However, bird-window impacts are disproportionate to relative abundance (Figure 2). For example, mourning doves were

killed by windows at twice the number counted in point counts, while Brewer's blackbirds were killed at only 2% of the number counted in point counts (Figure 2). According to eBird, all 8 species identified in Figure 1 with fatalities counted at >15% of their relative abundance also have been recorded in multiple records around the project site. Anna's hummingbird records are particularly abundant around the project site.

Window-collision fatalities as proportion of weekly number counted in area surveys



**Figure 2.** The ratio of window-collision fatalities to relative abundance related inversely to relative abundance, where some of the least abundant species contributed disproportionately to window-collision fatalities and some of the most abundant species contributed least to fatalities (data from Kahle et al. 2016). Data at the 0-intercept represent bird species either recorded as fatalities but never seen in relative abundance surveys or counted in relative abundance surveys and never recorded as fatalities.

A revised EIR is needed to seriously address potential impacts and how to mitigate them. Below is a discussion of the issue, ranging from interpreting available impact estimates to collision factors and mitigation.

Glass-façades of buildings intercept and kill many birds, but these façades are differentially hazardous to birds based on spatial extent, contiguity, orientation, and other factors. At Washington State University, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a three-story glass walkway (no fatality adjustments attempted). Prior to marking the windows to warn birds of the collision hazard, the collision rate was 84.7 per year. At that rate, and not attempting to adjust the fatality estimate for the proportion of fatalities not found, 4,235 birds were likely killed over the 50 years since the start of their study, and that's at a relatively small building façade (Figure 3). Accounting for the proportion of fatalities not found, the number of birds killed by this walkway over the last 50 years would have been about 12,705. And this is just for one 3-story, glass-sided walkway between two college campus buildings.

**Figure 3.** *A walkway connecting two buildings at Washington State University where one of the earliest studies of bird collision mortality found 85 bird fatalities per year prior to marking windows (254 bird deaths per year adjusted for the proportion of carcasses likely not found). Given that the window markers have long since disappeared, this walkway has likely killed at least 12,705 birds since 1968, and continues to kill birds. Notice that the transparent glass on both sides of the walkway gives the impression of unimpeded airspace that can be navigated safely by birds familiar with flying between tree branches. Also note the reflected images of trees, which can mislead birds into seeing safe perch sites. Further note the distances of ornamental trees, which allow birds taking off from those trees to reach full speed upon arrival at the windows.*



Window collisions are often characterized as either the second or third largest source or human-caused bird mortality. The numbers behind these characterizations are often attributed to Klem's (1990) and Dunn's (1993) estimates of about 100 million to 1 billion bird fatalities in the USA, or more recently Loss et al.'s (2014) estimate of 365-988 million bird fatalities in the USA or Calvert et al.'s (2013) and Machtans et al.'s (2013) estimates of 22.4 million and 25 million bird fatalities in Canada, respectively. However, these estimates and their interpretation warrant examination because they



were based on opportunistic sampling, volunteer study participation, and fatality monitoring by more inexperienced than experienced searchers.

Klem's (1990) estimate was based on speculation that 1 to 10 birds are killed per building per year, and this speculated range was extended to the number of buildings estimated by the US Census Bureau in 1986. Klem's speculation was supported by fatality monitoring at only two houses, one in Illinois and the other in New York. Also, the basis of his fatality rate extension has changed greatly since 1986. Whereas his estimate served the need to alert the public of the possible magnitude of the bird-window collision issue, it was highly uncertain at the time and undoubtedly outdated more than three decades hence. Indeed, by 2010 Klem (2010) characterized the upper end of his estimated range – 1 billion bird fatalities – as conservative. Furthermore, the estimate lumped species together as if all birds are the same and the loss of all birds to windows has the same level of impact.

Homes with birdfeeders are associated with higher rates of window collisions than are homes without birdfeeders (Kummer and Bayne 2015, Kummer et al. 2016a), so the developed area might pose even greater hazard to birds if it includes numerous birdfeeders. Another factor potentially biasing national or North American estimates low was revealed by Bracey et al.'s (2016) finding that trained fatality searchers found 2.6× the number of fatalities found by homeowners on the days when both trained searchers and homeowners searched around homes. The difference in carcass detection was 30.4-fold when involving carcasses volitionally placed by Bracey et al. (2016) in blind detection trials. This much larger difference in trial carcass detection rates likely resulted because their placements did not include the sounds that typically alert homeowners to actual window collisions, but this explanation also raises the question of how often homeowner participants with such studies miss detecting window-caused fatalities because they did not hear the collisions.

By the time Loss et al. (2014) performed their effort to estimate annual USA bird-window fatalities, many more fatality monitoring studies had been reported or were underway. Loss et al. (2014) were able to incorporate many more fatality rates based on scientific monitoring, and they were more careful about which fatality rates to include. However, they included estimates based on fatality monitoring by homeowners, which in one study were found to detect only 38% of the available window fatalities (Bracey et al. 2016). Loss et al. (2014) excluded all fatality records lacking a dead bird in hand, such as injured birds or feather or blood spots on windows. Loss et al.'s (2014) fatality metric was the number of fatalities per building (where in this context a building can include a house, low-rise, or high-rise structure), but they assumed that this metric was based on window collisions. Because most of the bird-window collision studies were limited to migration seasons, Loss et al. (2014) developed an admittedly assumption-laden correction factor for making annual estimates. Also, only 2 of the studies included adjustments for carcass persistence and searcher detection error, and it was unclear how and to what degree fatality rates were adjusted for these factors. Although Loss et al. (2014) attempted to account for some biases as well as for large sources of uncertainty mostly resulting from an opportunistic rather than systematic sampling data source,

their estimated annual fatality rate across the USA was highly uncertain and vulnerable to multiple biases, most of which would have resulted in fatality estimates biased low.

In my review of bird-window collision monitoring, I found that the search radius around homes and buildings was very narrow, usually 2 meters. Based on my experience with bird collisions in other contexts, I would expect that a large portion of bird-window collision victims would end up farther than 2 m from the windows, especially when the windows are higher up on tall buildings. In my experience, searcher detection rates tend to be low for small birds deposited on ground with vegetation cover or woodchips or other types of organic matter. Also, vertebrate scavengers entrain on anthropogenic sources of mortality and quickly remove many of the carcasses, thereby preventing the fatality searcher from detecting these fatalities. Adjusting fatality rates for these factors – search radius bias, searcher detection error, and carcass persistence rates – would greatly increase nationwide estimates of bird-window collision fatalities.

Buildings can intercept many nocturnal migrants as well as birds flying in daylight. As mentioned above, Johnson and Hudson (1976) found 266 bird fatalities of 41 species within 73 months of monitoring of a four-story glass walkway at Washington State University (no adjustments attempted). Somerlot (2003) found 21 bird fatalities among 13 buildings on a university campus within only 61 days. Monitoring twice per week, Hager et al. (2008) found 215 bird fatalities of 48 species, or 55 birds/building/year. At another site they found 142 bird fatalities of 37 species for 24 birds/building/year. Gelb and Delacretaz (2009) recorded 5,400 bird fatalities under buildings in New York City, based on a decade of monitoring only during migration periods, and some of the high-rises were associated with hundreds of fatalities each. Klem et al. (2009) monitored 73 building façades in New York City during 114 days of two migratory periods, tallying 549 collision victims, nearly 5 birds per day. Borden et al. (2010) surveyed a 1.8 km route 3 times per week during 12-month period and found 271 bird fatalities of 50 species. Parkins et al. (2015) found 35 bird fatalities of 16 species within only 45 days of monitoring under 4 building façades. From 24 days of survey over a 48 day span, Porter and Huang (2015) found 47 fatalities under 8 buildings on a university campus. Sabo et al. (2016) found 27 bird fatalities over 61 days of searches under 31 windows. In San Francisco, Kahle et al. (2016) found 355 collision victims within 1,762 days under a 5-story building. Ocampo-Peñuela et al. (2016) searched the perimeters of 6 buildings on a university campus, finding 86 fatalities after 63 days of surveys. One of these buildings produced 61 of the 86 fatalities, and another building with collision-deterrent glass caused only 2 of the fatalities, thereby indicating a wide range in impacts likely influenced by various factors. There is ample evidence available to support my prediction that the proposed project will result in many collision fatalities of birds.



## Project Impact Prediction

Predicting the number of bird collisions at a new project is challenging because the study of window collisions remains in its early stages. Researchers have yet to agree on a collision rate metric. Some have reported findings as collisions per building per year and some as collisions per building per day. Some have reported findings as collisions per m<sup>2</sup> of window. The problem with the temporal factor in the collision rate metrics has been monitoring time spans varying from a few days to 10 years, and even in the case of the 10-year span, monitoring was largely restricted to spring and fall migration seasons. Short-term monitoring during one or two seasons of the year cannot represent a 'year,' but monitoring has rarely spanned a full year. Using 'buildings' in the metric treats buildings as all the same size, when we know they are not. Using square meters of glass in the metric treats glass as the only barrier upon which birds collide against a building's façade, when we know it is not. It also treats all glass as equal, even though we know that collision risk varies by type of glass as well as multiple factors related to contextual settings.

Without the benefit of more advanced understanding of window collision factors, my prediction of project impacts will be uncertain. Klem's (1990) often-cited national estimate of avian collision rate relied on an assumed average collision rate of 1 to 10 birds per building per year, but studies since then have all reported higher rates of collisions 12 to 352 birds per building per year. Because the more recent studies were likely performed at buildings known or suspected to cause many collisions, collision rates from them could be biased high. By the time of these comments I had reviewed and processed results of bird collision monitoring at 181 buildings and façades for which bird collisions per m<sup>2</sup> of glass per year could be calculated and averaged (Johnson and Hudson 1976, O'Connell 2001, Somerlot 2003, Hager et al. 2008, Borden et al. 2010, Hager et al. 2013, Porter and Huang 2015, Parkins et al. 2015, Kahle et al. 2016, Ocampo-Peñuela et al. 2016, Sabo et al. 2016, Barton et al. 2017, Schneider et al. 2018). These averaged 0.076 bird deaths per m<sup>2</sup> of glass per year (95% CI: 0.043-0.109). Looking over the proposed building design as depicted in City of Redwood City (2019), I estimated the buildings would include 28,550 m<sup>2</sup> of glass windows and window curtain walls, which applied to the mean fatality rate would predict **2,170 bird deaths per year (95% CI: 1,228-3,103)** at the buildings. After 50 years the toll from this average annual fatality rate would be 108,490 bird deaths, with an empirically founded upper-end possibility of 155,169 deaths. As mentioned earlier, the accuracy of this prediction depends on factors known or hypothesized to affect window collision rates, and it could be mitigated within the current building design or additionally mitigated to a much reduced rate.

Suffice it to say that the project's extensive use of glass windows will cause highly significant impacts on birds, including special-status species of birds. This project, as designed, will kill thousands of birds each year, totaling hundreds of thousands of bird fatalities through the life of the project. Certain architectural design attributes will likely exacerbate project impacts, including use of canopies, alcoves, and transparent building corners. This project, if built as planned, could end up qualifying as one of the most

dangerous bird hazards in North America. Redwood City has yet to analyze these impacts, nor has it yet to formulate mitigation measures. Guidelines on building designs to minimize bird-window collisions are available and need to be utilized.

### Window Collision Factors

Below is a list of collision factors I found in the scientific literature. Following this list are specific notes and findings taken from the literature and my own experience.

- (1) Inherent hazard of a structure in the airspace used for nocturnal migration or other flights
- (2) Window transparency, falsely revealing passage through structure or to indoor plants
- (3) Window reflectance, falsely depicting vegetation, competitors, or open airspace
- (4) Black hole or passage effect
- (5) Window or façade extent, or proportion of façade consisting of window or other reflective surface
- (6) Size of window
- (7) Type of glass
- (8) Lighting, which is correlated with window extent and building operations
- (9) Height of structure (collision mechanisms shift with height above ground)
- (10) Orientation of façade with respect to winds and solar exposure
- (11) Structural layout causing confusion and entrapment
- (12) Context in terms of urban-rural gradient, or surrounding extent of impervious surface vs vegetation
- (13) Height, structure, and extent of vegetation grown near home or building
- (14) Presence of birdfeeders or other attractants
- (15) Relative abundance
- (16) Season of the year
- (17) Ecology, demography and behavior
- (18) Predatory attacks or cues provoking fear of attack
- (19) Aggressive social interactions

(1) Inherent hazard of structure in airspace.—Not all of a structure’s collision risk can be attributed to windows. Overing (1938) reported 576 birds collided with the Washington Monument in 90 minutes on one night, 12 September 1937. The average annual fatality count had been 328 birds from 1932 through 1936. Gelb and Delacretaz (2009) and Klem et al. (2009) also reported finding collision victims at buildings lacking windows, although many fewer than they found at buildings fitted with windows. The takeaway is that any building going up at the project site would likely kill birds, although the impacts of a glass-sided building would likely be much greater.

(2) Window transparency.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the transparency of glass used in windows on the buildings (Klem 1989). Gelb and Delacretaz (2009) felt that many of

the collisions they detected occurred where transparent windows revealed interior vegetation.

(3) Window reflectance.—Widely believed as one of the two principal factors contributing to avian collisions with buildings is the reflectance of glass used in windows on the buildings (Klem 1989). Reflectance can deceptively depict open airspace, vegetation as habitat destination, or competitive rivals as self-images (Klem 1989). Gelb and Delacretaz (2009) felt that many of the collisions they detected occurred toward the lower parts of buildings where large glass exteriors reflected outdoor vegetation. Klem et al. (2009) and Borden et al. (2010) also found that reflected outdoor vegetation associated positively with collisions. Depictions of the proposed building include palm trees likely to be reflected in the windows.

(4) Black hole or passage effect.—Although this factor was not often mentioned in the bird-window collision literature, it was suggested in Sheppard and Phillips (2015). The black hole or passage effect is the deceptive appearance of a cavity or darkened ledge that certain species of bird typically approach with speed when seeking roosting sites. The deception is achieved when shadows from awnings or the interior light conditions give the appearance of cavities or protected ledges. This factor appears potentially to be nuanced variations on transparency or reflectance or possibly an interaction effect of both of these factors.

(5) Window or façade extent.—Klem et al. (2009), Borden et al. (2010), Hager et al. (2013), and Ocampo-Peñuela et al. (2016) reported increased collision fatalities at buildings with larger reflective façades or higher proportions of façades composed of windows. However, Porter and Huang (2015) found a negative relationship between fatalities found and proportion of façade that was glazed. Some of the proposed windows appear to be quite large and extensive.

(6) Size of window.—According to Kahle et al. (2016), collision rates were higher on large-pane windows compared to small-pane windows.

(7) Type of glass.—Klem et al. (2009) found that collision fatalities associated with the type of glass used on buildings. Otherwise, little attention has been directed towards the types of glass in buildings.

(8) Lighting.—Parkins et al. (2015) found that light emission from buildings correlated positively with percent glass on the façade, suggesting that lighting is linked to the extent of windows. Zink and Eckles (2010) reported fatality reductions, including an 80% reduction at a Chicago high-rise, upon the initiation of the Lights-out Program. However, Zink and Eckles (2010) provided no information on their search effort, such as the number of searches or search interval or search area around each building.

(9) Height of structure.—I found little if any hypothesis-testing related to building height, including whether another suite of factors might relate to collision victims of

high-rises. Are migrants more commonly the victims of high-rises or of smaller buildings?

(10) Orientation of façade.—Some studies tested façade orientation, but not convincingly. Confounding factors such as the extent and types of windows would require large sample sizes of collision victims to parse out the variation so that some portion of it could be attributed to orientation of façade. Whether certain orientations cause disproportionately stronger or more realistic-appearing reflections ought to be testable through measurement, but counting dead birds under façades of different orientations would help.

(11) Structural layout.—Bird-safe building guidelines have illustrated examples of structural layouts associated with high rates of bird-window collisions, but little attention has been directed towards hazardous structural layouts in the scientific literature. An exception was Johnson and Hudson (1976), who found high collision rates at 3 stories of glassed-in walkways atop an open breezeway, located on a break in slope with trees on one side of the structure and open sky on the other, Washington State University.

(12) Context in urban-rural gradient.—Numbers of fatalities found in monitoring have associated negatively with increasing developed area surrounding the building (Hager et al. 2013), and positively with more rural settings (Kummer et al. 2016a). Based on what is known, I cannot at this time predict whether the project's location would contribute more or less to the collision risk already posed by the proposed extent of windows and nearness to trees and wetlands.

(13) Height, structure and extent of vegetation near building.—Correlations have sometimes been found between collision rates and the presence or extent of vegetation near windows (Hager et al. 2008, Borden et al. 2010, Kummer et al. 2016a, Ocampo-Peñuela et al. 2016). However, Porter and Huang (2015) found a negative relationship between fatalities found and vegetation cover near the building. In my experience, what probably matters most is the distance from the building that vegetation occurs. If the vegetation that is used by birds is very close to a glass façade, then birds coming from that glass will be less likely to attain sufficient speed upon arrival at the façade to result in a fatal injury. Too far away and there is probably no relationship. But 30 to 50 m away, birds alighting from vegetation can attain lethal speeds by the time they arrive at the windows.

(14) Presence of birdfeeders.—Dunn (1993) reported a weak correlation ( $r = 0.13$ ,  $P < 0.001$ ) between number of birds killed by home windows and the number of birds counted at feeders. However, Kummer and Bayne (2015) found that experimental installment of birdfeeders at homes increased bird collisions with windows 1.84-fold.

(15) Relative abundance.—Collision rates have often been assumed to increase with local density or relative abundance (Klem 1989), and positive correlations have been

measured (Dunn 1993, Hager et al. 2008). However, Hager and Craig (2014) found a negative correlation between fatality rates and relative abundance near buildings.

(16) Season of the year.—Borden et al. (2010) found 90% of collision fatalities during spring and fall migration periods. The significance of this finding is magnified by 7-day carcass persistence rates of 0.45 and 0.35 in spring and fall, rates which were considerably lower than during winter and summer (Hager et al. 2012). In other words, the concentration of fatalities during migration seasons would increase after applying seasonally-explicit adjustments for carcass persistence. Fatalities caused by collisions into the glass façades of the project's buildings would likely be concentrated in fall and spring migration periods.

(17) Ecology, demography and behavior.—Klem (1989) noted that certain types of birds were not found as common window-caused fatalities, including soaring hawks and waterbirds. Cusa et al. (2015) found that species colliding with buildings surrounded by higher levels of urban greenery were foliage gleaners, and species colliding with buildings surrounded by higher levels of urbanization were ground foragers. Sabo et al. (2016) found no difference in age class, but did find that migrants are more susceptible to collision than resident birds.

(18) Predatory attacks.—Panic flights caused by raptors were mentioned in 16% of window strike reports in Dunn's (1993) study. I have witnessed Cooper's hawks chasing birds into windows, including house finches next door to my home and a northern mockingbird chased directly into my office window. Predatory birds likely to collide with the project's windows would include Peregrine falcon, red-shouldered hawk, Cooper's hawk, and sharp-shinned hawk.

(19) Aggressive social interactions.—I found no hypothesis-testing of the roles of aggressive social interactions in the literature other than the occasional anecdotal account of birds attacking their self-images reflected from windows. However, I have witnessed birds chasing each other and sometimes these chases resulting in one of the birds hitting a window.

## **Window Collision Solutions**

Given the magnitude of bird-window collision impacts, there are obviously great opportunities for reducing and minimizing these impacts going forward. Existing structures can be modified or retrofitted to reduce impacts, and proposed new structures can be more carefully sited and designed to minimize impacts. However, the costs of some of these measures can be high and can vary greatly, but most importantly the efficacies of many of these measures remain uncertain. Both the costs and effectiveness of all of these measures can be better understood through experimentation and careful scientific investigation. Post-construction fatality monitoring should be an essential feature of any new building project. Below is a listing of mitigation options, along with some notes and findings from the literature.

**(1) Elements to reduce impacts**

- (1A) Marking windows
- (1B) Managing outdoor landscape vegetation
- (1C) Managing indoor landscape vegetation
- (1D) Managing nocturnal lighting

(1A) Marking windows.—Whereas Klem (1990) found no deterrent effect from decals on windows, Johnson and Hudson (1976) reported a fatality reduction of about 69% after placing decals on windows. In an experiment of opportunity, Ocampo-Peñuela et al. (2016) found only 2 of 86 fatalities at one of 6 buildings – the only building with windows treated with a bird deterrent film. At the building with fritted glass, bird collisions were 82% lower than at other buildings with untreated windows. Kahle et al. (2016) added external window shades to some windowed façades to reduce fatalities 82% and 95%. Many external and internal glass markers have been tested experimentally, some showing no effect and some showing strong deterrent effects (Klem 1989, 1990, 2009, 2011; Klem and Saenger 2013; Rössler et al. 2015).

Following up on the results of Johnson and Hudson (1976), I decided to mark windows of my home, where I have documented 5 bird collision fatalities between the time I moved in and 6 years later. I marked my windows with decals delivered to me via US Postal Service from a commercial vendor. I have documented no fatalities at my windows during the 7 years hence. Just recently (8 December 2018) I photographed a ruby-crowned kinglet pulling up short of my window (Figure 4), right at one of my installed markers. In my assessment, markers are very effective.

**Figure 4.** *Ruby-crowned kinglet puts on the brakes in front of a decal I applied to mark windows of my home, 8 December 2018. This window killed birds prior to marking, but I have found no window collision victims since marking the windows. Windows with attractive built-in marking are commercially available.*

**(2) Siting and Designing to minimize impacts**

- (2A) Deciding on location of structure
- (2B) Deciding on façade and orientation
- (2C) Selecting type and sizes of windows
- (2D) Designing to minimize transparency through two parallel façades
- (2E) Designing to minimize views of interior plants

(2F) Landscaping to increase distances between windows and trees and shrubs

### **Guidelines on Building Design**

If the project goes forward, it should at a minimum adhere to available guidelines on building design intended to minimize collision hazards to birds. The American Bird Conservancy (ABC) produced an excellent set of guidelines recommending actions to: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015). The City of San Francisco (San Francisco Planning Department 2011) also has a set of building design guidelines, based on the excellent guidelines produced by the New York City Audubon Society (Orff et al. 2007). The ABC document and both the New York and San Francisco documents provide excellent alerting of potential bird-collision hazards as well as many visual examples. The San Francisco Planning Department's (2011) building design guidelines are more comprehensive than those of New York City, but they could have gone further. For example, the San Francisco guidelines probably should have also covered scientific monitoring of impacts as well as compensatory mitigation for impacts that could not be avoided, minimized or reduced.

### **Artificial Light**

City of Redwood City (2019) did not address the project's impacts on wildlife that would be caused by the addition of artificial lighting. Artificial lighting causes a variety of substantial impacts on a variety of wildlife species (Rich and Longcore 2006). At the site of the proposed project I am particularly concerned about the project's lighting impacts on wildlife residing in Bay waters, including harbor seals, California brown pelicans, double-crested cormorants, and other species. I am also concerned about the project's lighting impacts on salt marsh harvest mouse in nearby pickleweed stands. Added lighting could cause displacement or altered activity patterns of at least some species.

### **Wildlife Movement**

City of Redwood City (2019:4.3-32) committed a mere two sentences to potential project impacts on wildlife movement in the region. According to the City, the project site is located within a sensitive natural area, and therefore the project has low potential to adversely affect wildlife corridors or nursery sites. This conclusion does not follow logically from the premise; the conclusion makes no sense.

The project site is located at the interface of developed land and Bay waters and marsh. Birds fly along this interface for migration, dispersal, home range patrol and daily foraging. City of Redwood City (2019:4.3-320) acknowledges this, "*...birds typically follow coastlines, rivers, and mountain ranges in their migratory passages from wintering to breeding grounds and back again.*" Erecting multiple buildings on this

coastline would pose a barrier to bird movement. It would also cast artificial light into potential nursery areas, thereby degrading them.

The CEQA standard regarding wildlife movement is whether a project will “*Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors...*” The primary phrase of the CEQA standard goes to wildlife movement regardless of whether the movement is channeled by a corridor, which is actually a human construct intended to reduce the effect of habitat fragmentation (Smallwood 2015). A site such as the proposed project site is critically important for wildlife movement because it borders urban sprawl, forcing more volant wildlife to use the site as stop-over and staging habitat during migration, dispersal, and home range patrol (Warnock 2010, Taylor et al. 2011, Runge et al. 2014). The project would cut wildlife off from stop-over and staging habitat, and would therefore interfere with wildlife movement in the region. Mitigation measures are needed to minimize and offset project impacts on wildlife movement and nearby nursery sites.

## CUMULATIVE IMPACTS

According to City of Redwood City (2019:4.3-35), “*Cumulative developments, particularly those in proximity to water and natural resources, have been or will be adequately assessed for their potential to result in significant environmental effects and would be required to implement adopted mitigation measures to reduce such impacts.*” This argument implies that cumulative effects are really just residual, unmitigated impacts. If this implication was correct, then CEQA would not have included a requirement for cumulative effects analysis because mitigation for project-specific impacts would always negate cumulative effects. The EIR needs to be revised so that it includes an adequate cumulative effects analysis.

City of Redwood city (2019:4.3-36) also argues, “*Further, environmentally protective laws and regulations have been applied with increasing rigor since the early 1970s and include the CESA, FESA, and the CWA, as described earlier in this section.*” This argument ironically follows the earlier explanation that protections of the Migratory Bird Treaty Act were recently relaxed, thereby justifying the DEIR’s conclusion of less-than-significant impacts on migratory birds colliding with the project’s buildings. City of Redwood City is attempting to have it both ways by arguing on the one hand that less rigor in protective laws justifies its less-than-significant conclusion related to bird collision impacts, and on the other hand no need to perform cumulative effects analysis due to the increasing rigor in environmental laws. These types of arguments seem inconsistent with the spirit and intent of CEQA’s requirement for a cumulative effects analysis.

That 56 special-status species of wildlife are listed in Table 1 as potentially adversely affected by the project serves as ample evidence of significant cumulative effects. Each of the species in Table 1 have been assigned special status as a result of cumulative effects of human activities. The proposed project would contribute another suite of



impacts that would adversely affect many of the species in Table 1, and therefore will contribute significantly to cumulative impacts on wildlife.

When it comes to wildlife, cumulative effects can often be interpreted as effects on the numerical capacity (Smallwood 2015), breeding success, genetic diversity, or other population performance metrics expressed at the regional scale. In the case of migrating birds, the project's cumulative effects could be measured as numerical reductions of breeding birds at far-off breeding sites, as migrating adults and next-year's recruits lose access to stop-over habitat. These effects could be predicted and measured, such as directly by the loss of birds to collision with the project's buildings, and less directly by counts of birds nesting in nearby breeding areas. If birds were to lose all stop-over habitat across the South Bay, then the numerical capacity of migration might decline for multiple species. Unfortunately, little is known about stop-over habitat requirements, such as how often migrants lose their lives for lack of stop-over habitat. Nevertheless, crude assessments are possible and imperative.

## **MITIGATION**

### **Measure BIO-1c: Preconstruction survey and nest season avoidance**

Whereas construction should avoid the nesting season and preconstruction surveys should be performed to minimize the project's immediate impacts to nesting birds, these steps would not prevent the permanent loss of bird nesting habitat, nor the permanent degradation of nearby nesting habitat caused by light pollution. Compensatory mitigation is also needed to fully mitigate the loss of bird nesting habitat.

### **Measure BIO-1c: Protection of roosting bats**

Whereas preconstruction surveys should be performed to minimize the project's immediate impacts to roosting bats, these steps would not prevent the permanent loss of roosting habitat, nor the permanent degradation of nearby roosting habitat caused by light pollution. Compensatory mitigation is also needed to fully mitigate the loss of bat roosting habitat.

### **Measure BIO-2a: Conduct Wetland Delineation**

A wetland delineation was needed prior to the circulation of the DEIR. The public and decision-makers need to know the locations, types and extents of wetlands the project could potentially affect, and they need to know this information by the time they finish reading the DEIR. Without a wetland delineation, project impacts on wetlands could not have been analyzed, nor could appropriate mitigation measures have been formulated. The EIR needs to be revised and recirculated after a wetlands delineation has been completed.

## RECOMMENDED MEASURES

### Window Collisions

Transparency and reflectance increase collision risk, but there are materials available to minimize the effects of transparency and reflectance, including the glass itself. The DEIR says that some windows would be fritted, but more details are needed on this method, including the density and extent of fritting on windows. Whereas fritting would likely help reduce collision fatalities, it remains unknown to what degree impacts would be reduced.

Landscaping around buildings can also affect collision risk, but risks can be minimized by carefully planning the landscaping. Interior lighting also increases risk to nocturnal migrants, but the effects of interior lighting is readily mitigated by minimizing use of lights as well as the lighting of any interior landscaping. I recommend consulting available guidelines on minimizing impacts to wildlife caused by windows.

The American Bird Conservancy produced an excellent set of guidelines recommending: (1) Minimize use of glass; (2) Placing glass behind some type of screening (grilles, shutters, exterior shades); (3) Using glass with inherent properties to reduce collisions, such as patterns, window films, decals or tape; and (4) Turning off lights during migration seasons (Sheppard and Phillips 2015). The City of San Francisco (San Francisco Planning Department 2011) also has a set of building design guidelines, based on the excellent guidelines produced by the New York City Audubon Society (Orff et al. 2007).

In addition to measures for minimizing wind collision impacts, I recommend fatality monitoring around the buildings' perimeters for several years following construction. Such monitoring should be scientific, adhering to standards developed for fatality monitoring in other window collision studies and along electrical circuits and at wind projects.

### Fund Wildlife Rehabilitation Facilities

Compensatory mitigation ought also to include funding contributions to wildlife rehabilitation facilities to cover the costs of injured animals that will be delivered to these facilities for care. Most of the wildlife injuries will likely be caused by collisions with the building's windows and with cars driven to and from the site. But the project's impacts can also be offset by funding the treatment of injuries to animals caused by other buildings, electric lines, cars, and cats.

Thank you for your attention,




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Shawn Smallwood, Ph.D.

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**Curriculum Vitae**

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Born May 3, 1963 in  
Sacramento, California.  
Married, father of two.

**Ecologist**

**Expertise**

- Finding solutions to controversial problems related to wildlife interactions with human industry, infrastructure, and activities;
- Wildlife monitoring and field study using GPS, thermal imaging, behavior surveys;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns that inform management decisions.

**Education**

Ph.D. Ecology, University of California, Davis. September 1990.  
M.S. Ecology, University of California, Davis. June 1987.  
B.S. Anthropology, University of California, Davis. June 1985.  
Corcoran High School, Corcoran, California. June 1981.

**Experience**

- 477 professional publications, including:
  - 81 peer reviewed publications
  - 24 in non-reviewed proceedings
  - 370 reports, declarations, posters and book reviews
  - 8 in mass media outlets
  - 87 public presentations of research results at meetings
  - Reviewed many professional papers and reports
  - Testified in 4 court cases.

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The



five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and advised the County on how to reduce wildlife fatalities.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling methods for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

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**Letter 11**      **Lozeau Drury, representing Laborers International Union of**  
**Response**      **North America**  
March 8, 2019

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- 11-1      With respect to construction related health risk to inmates at the adjacent Maple Street Correctional Center, this is addressed under Impact AIR-2, beginning on page 4.2-22, wherein the results of dispersion modeling are disclosed, with a resultant less-than-significant impact identified. With respect to operational health risk, the Project does not propose any stationary sources of toxic air contaminants (TACs) such as diesel back-up generator or other sources requiring a BAAQMD permit. While the Project would generate motor vehicle traffic, the vast majority of these vehicles would be gasoline powered, not diesel powered. BAAQMD guidance (BAAQMD, 2017) provides examples of projects the do not require a BAAQMD permit that may have TAC impacts related to TAC emissions. These include projects that generate a large proportion of diesel vehicle trip generation such as distribution centers and large retail centers. Because the land uses proposed by the Project do not include those that would reasonably be expected to generate TAC emissions, the operational TAC impact of the proposed Project as discussed on pages 4.2-28 of the Draft EIR would be less than significant. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.
- 11-2      Refer to the response to comment 8-25 that outlines the measures to mitigate bird collisions.
- 11-3      A general habitat assessment was conducted for the proposed Project. Special status wildlife species surveys were not conducted because the habitat assessment determined that suitable habitat for those species simply isn't present. Until recently, the full extent of the site was utilized for industrial and commercial purposes, including a water park, mini-golf course, and a racetrack, as well as industrial lay-down yards and warehousing facilities. In its current condition, more than half of the site is covered with concrete, asphalt, or other impervious surfaces, and that portion of the site that isn't so covered is comprised of recently-established ruderal vegetation that is regularly mowed and/or disked for weed abatement. Much of the site is still used for industrial lay-down purposes, or for the staging of heavy equipment. The aforementioned ruderal area is small in extent, lies immediately adjacent to a major regional freeway (US-101) to the south and active commercial and industrial uses to the north and west, and is subject to regular human disturbance in the form of illegal dumping, and, as was observed on one recent site visit, a homeless encampment. No portion of the site could in any way be construed as "natural" or in possession of any of the habitat characteristics required for the species listed by the commenter. In short, the

commenter's assertion that the site could provide habitat to any sensitive species cannot be supported under even the most conservative scenario. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.

- 11-4 See the response to comment 11-3, above. The site in question provides no habitat for migratory species, and it is surrounded by similar areas that are also absent of the features needed to support migratory wildlife. To the north, across a busy primary roadway, lies heavy industry uses (the Graniterock facility); to the east lies a large electric substation and an industrial parking area, beyond which lies a major arterial roadway (Seaport Boulevard and East Bayshore Road) and a freeway interchange; to the immediate south lies one of the most heavily-traveled freeways in the region, followed by dense urban development further beyond; and to the west lies the County jail, an expansive parking lot that serves as a rotating storage area for hundreds of vehicles, and a series of vacant lots that are covered over with the remnants of old foundation slabs. As was stated in the previous response, the commenter's assertion that the site could provide habitat for migratory species or serve the needs of migratory wildlife cannot be supported under even the most conservative scenario. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.
- 11-5 See the response to comment 11-4, above. The site lies adjacent to a major regional freeway that serves several hundred thousand vehicles each day. The site is also surrounded by a densely urbanized area that contains dozens of heavily-traveled arterial roadways and hundreds of lessor roadways that are, in turn, connected to a vast transportation network that covers hundreds of square miles in the Bay Area. Many hundreds of thousands of vehicles pass through the immediate area each day. While it is undeniable that wildlife mortality does occur on area roadways, the notion that Project-generated traffic would contribute to that mortality in any meaningful or statistically significant sense cannot be supported under even a worst-case evaluation. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.
- 11-6 As was presented in the Draft EIR, as well as in these responses to comments, the Project would not result in any significant effects to biological resources. The Project is essentially the redevelopment of a previously-utilized site in a dense urban setting. Since the Project itself would have no significant effects, it would not contribute to any cumulative effects to biological resources. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.



11-7           The petitioner is attempting to equate Bay Area Air Quality Management District (BAAQMD) thresholds for ambient health risks and hazards with worker exposure to indoor pollutants such as formaldehyde. The two are not equivalent. BAAQMD has not promulgated regulations concerning indoor pollutant exposure for compounds such as formaldehyde, except when use of those pollutants contribute to the generation of criteria pollutants through the production of volatile organic compounds (VOCs) and other criteria pollutant precursors. For example, BAAQMD Regulation 8-32 regulates formaldehyde use in the wood products manufacturing industry in the Bay Area, and limits emissions of VOCs during the manufacturing process. These BAAQMD regulations are in no way applicable to worker exposures to formaldehyde or any other pollutant. In fact, BAAQMD methodology for assessing risk and hazard impacts specifically states that workers are not considered sensitive receptors, because all employers must follow regulations set forth by the Occupation Safety and Health Administration (OSHA) to ensure the health and well-being of their employees (BAAQMD, Recommended Methods for Screening and Modeling Local Risks and Hazards, May 2011, page 12). BAAQMD's thresholds are therefore not applicable and are immaterial to this discussion.

Regardless, the Project would be required to comply with other applicable state and federal regulations concerning formaldehyde emissions. Materials that use formaldehyde have been the subject of active regulatory action for many years, most notably by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA). CARB's regulations require that all composite wood products sold in California comply with CARB's Phase 2 criteria for formaldehyde emissions (17 CCR 93120). EPA has also promulgated regulations under the authority provided under the Toxic Substances Control Act (15 USC 2697). Both of these regulatory frameworks are designed to limit exposures of persons who live and/or work where these materials are present. For products sold in California, the more stringent requirement applies, regardless of whether it is a CARB or an EPA requirement. Finally, OSHA has promulgated standards to protect workers that are exposed to formaldehyde (29 CFR 1910.1048). The Project would be required to comply with all of these requirements during construction and operation; accordingly, there would be no new significant effect created by the Project.



Via Email: [rpaul@jaypaul.com](mailto:rpaul@jaypaul.com)

February 7, 2019

Mr. Ray Paul  
Harbor View Property, LLC  
c/o Jay Paul Company  
Four Embarcadero Center, Suite 3620  
San Francisco, California 94111

**Re: Response to Draft Environmental Impact Report  
Harbor View Development Project, Redwood City California  
Project No.: 102-102-100**

Dear Ray:

Path Forward Partners, Inc. (Path Forward) is pleased to present Harbor View Property, LLC (Harbor View) this *Response to Draft Environmental Impact Report* (Response) for the Harbor View Development Project (Development) located in Redwood City, California (the Site). This Response was developed pursuant to the release of the *Draft Environmental Impact Report* (DEIR) dated January 2019 prepared by Environmental Science Associates (ESA) (ESA 2019) on behalf of the City of Redwood City (City).

## **BACKGROUND**

This Site is under a Voluntary Cleanup Agreement (VCA) between Harbor View and the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) to assess and mitigate shallow soil with asbestos containing materials (ACM) during redevelopment activities. Details are presented in our *Draft Removal Action Workplan* (RAW) dated December 7, 2019 (Path Forward 2018), which is pending approval from the DTSC.

The Site was also formerly under regulatory oversight by the San Mateo County Groundwater Protection Program (GPP) pertaining to historical environmental conditions that received regulatory closure with no further action required. Additional information pertaining to the historical cases associated with the Site are presented in the *Phase I Environmental Site Assessment* (Phase I ESA) (RPS 2018a) and Draft RAW (Path Forward 2018).

**RESPONSES TO DRAFT ENVIRONMENTAL IMPACT REPORT**

The DEIR provides a high-level summary of the environmental conditions associated with the Site. Path Forward has reviewed the DEIR and this letter provides comments pertaining primarily to:

- Hazardous Mitigation Measures
- On-Site Public Amenities theoretical alternative use to include an on-Site child day care center and adult soccer field as part of the Development.

**Hazardous Mitigation Measures**

As noted in Section 4.7 and Table 2-2 of the DEIR, Mitigation Measure HAZ-1a states:

*“Mitigation Measure HAZ-1a: Prior to the issuance of a grading permit, the Project applicant shall implement the recommendations contained in the Project-specific Phase I Assessment (RPS, 2018) and submit to the City evidence of approval of the Draft Removal Action Workplan (RAW) by the Department of Toxic Substances Control (DTSC) that contains a Site Management Plan (SMP), Health and Safety Plan stamped by a Certified Industrial Hygienist, a voluntary Dust Control Plan/Asbestos Dust Mitigation Plan/Asbestos Air Monitoring Plan, a Waste Transportation Plan, and Construction Quality Assurance Plan.”*

Path Forward notes that the Draft RAW (RPS 2018b) has since been revised and submitted to the DTSC for approval. The revised Draft RAW (Path Forward 2018) includes the SMP, Health and Safety Plan stamped by a Certified Industrial Hygienist, a voluntary Dust Control Plan/Asbestos Dust Mitigation Plan/Asbestos Air Monitoring Plan, and Waste Transportation Plan.<sup>1</sup> Path Forward has received email communication from DTSC that the Draft RAW has been internally approved and will be subject to a public comment period prior to final approval.

With the exception of the recordation of the land use covenant (LUC), the recommendations presented in the *Phase I Environmental Site Assessment (ESA)* (RPS 2018a) will be completed prior to or during development. We note that several of the recommendations in the Phase I ESA have already been completed including the vapor intrusion/methane gas evaluation presented in the Draft RAW (Path Forward 2018). Since the time the Phase I ESA was issued, the Leaking Underground Storage Tank (LUST) case associated with 410 Blomquist Street received regulatory closure, and the LUST case associated with 320 Blomquist Street is in the process of being closed. Additional information pertaining to these LUST cases are available on the State of California GeoTracker online database.

As noted in Section 4.7 and Table 2-2 of the DEIR, Mitigation Measure HAZ-1b states:

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<sup>1</sup> As requested by the DTSC, the Construction Quality Assurance Plan was incorporated into the SMP document in the Draft RAW.

**Mitigation Measure HAZ-1b:** *Prior to the issuance of a grading permit, the Project applicant shall record a Land Use Covenant (LUC), in a form approved by the City, that requires that the SMP to be followed during future earthwork activities during and post-development. The LUC shall include conditional language describing when implementation of the SMP will be required for earthwork activities beneath either hardscaped areas or a beneath a specified thickness of clean fill or marker fabric required for non-hardscaped areas. The LUC shall also include language to prohibit the use of groundwater beneath the Project site.*

Currently, the DEIR sets up a condition where the City will not allow for a grading permit until the DTSC approves the LUC. In addition, the DTSC will not approve the Draft RAW until the DEIR has been accepted by the City (because the DTSC needs to conduct a formal CEQA exemption).

As requested by the DTSC and stated in the revised Draft RAW (Path Forward 2018), the LUC will be recorded with the County of San Mateo **after** the RAW has been implemented and following submittal of the *Removal Action Completion Report (RACR)* that will be prepared for the Site. As described in the RAW, implementation of the RAW includes completion of construction of the proposed buildings, hardscape, and landscaped areas to act as a cap protecting future inhabitants from coming in to contact with the subsurface contaminants. Based on this requirement, the DTSC **will not** record the LUC prior to implementation of the RAW that includes construction of the proposed Development.

Based on this information, Path Forward recommends that Mitigation Measure HAZ-1b be modified accordingly. Specifically, this should remove the requirement to obtain the LUC prior to obtaining the grading permit because this is not feasible or practical.

12-1

**On-Site Public Amenities (Sections 5.3 and 5.5.6)**

As noted in Section 4.7 and Table 2-2 of the DEIR, a proposed alternative use includes incorporating an on-Site child day care center and an adult soccer field as part of the Development. As specified in the DEIR,

*“The On-site Public Amenities Alternative responds to comments received during scoping of this EIR. Neither the City nor the Project applicant has put forth a proposal for development of a sports field facility on the proposed Project site. The City developed the following theoretical scenario that would accommodate one to four adult soccer fields on one to four acres of the Project site. As shown in Table 5-1, this alternative would develop three of the four office buildings proposed with the Project, and the amenities building would introduce ancillary child care for Project employees. Total floor area would be approximately 26 percent less than the proposed Project (882 ksf compared to 1.18 msf). The basic access and configuration of development on the site would otherwise be the same as with the proposed Project, and given the reduced development, this alternative assumes that the taller of the two parking structures (Parking Structure A on the west edge of the site) would be reduced from five to three*

*stories. The soccer fields would be synthetic turf underlain by composite gravel but would not include spectator seating or other support facilities. However, the fields would include minimal, as-needed pole lighting for nighttime use, in addition to the permanent nighttime and security lighting that would be provided for the entire office campus. Like the Reduced Buildout / Building Height alternative previously discussed in this analysis, this alternative would result in reduced environmental effects that are influenced by the change in the site Plan. This alternative introduces outdoor recreational use and ancillary child care; both are sensitive receptors in terms of exposure to TACs, and the child care use is considered a noise-sensitive use.*

*“Day care centers, which this alternative would include as an ancillary use (limited in size and supporting employees) in the amenities building, is considered a sensitive receptor as it involves children who are more sensitive to poor air quality than the general public. Recreation facilities, such as soccer fields, are also considered sensitive due to the greater exposure to ambient air quality conditions because vigorous exercise associated with some forms of recreation places a high demand on the human respiratory system.”*

For reasons discussed below, Path Forward concludes that the above-referenced proposed theoretical uses of the Site as an ancillary child care center and adult soccer field are not appropriate at the Site.

12-2

*Land Use Covenant (LUC) Restrictions*

As specified in the Draft RAW (Path Forward 2018), the Site owner will work with DTSC to develop a LUC for the Site. As requested by the DTSC, due to the subsurface contaminants, the LUC will prohibit the following Site uses:

- A first-floor residence, including any mobile home or factory-built housing constructed or installed for use as residential human habitation;
- A hospital for humans;
- A public or private school for persons under 18 years of age; or
- A first-floor daycare for children.

Because the DTSC will be imposing land use restrictions as a condition of the approved remedy for the Site, sensitive uses are not suitable or appropriate. As discussed above, adult soccer fields and child day care centers fall into this category.

*Unhealthy Air Quality Associated with the Upgradient Graniterock Manufacturing Plant and Proximity to Highway 101*

The outdoor air quality in proximity to Highway 101 and the upgradient Graniterock facility is considered to be extremely poor and unhealthy, especially to sensitive populations. Path Forward notes that child day care facilities include the use of an outdoor play area, which

would subject children to unhealthy and potentially harmful air. Furthermore, as discussed in the sections below (and in various sections of the DEIR), the use of an adult soccer field is not an appropriate use of the Site.

The DEIR (ESA 2019) expressly states the following:

*“In the BAAQMD’s health risk database, the Graniterock manufacturing plant located immediately adjacent to the east side of the Specific Plan Area shows an annual average PM<sub>2.5</sub> concentration of 206 micrograms per cubic meter. This level represents a potential health risk to sensitive receptors in the vicinity of this facility.”*

*“For the purposes of this air quality analysis, sensitive receptors are places with people who are considered to be more sensitive than others to air pollutants. As introduced above (see “Toxic Air Contaminants” and “Existing Air Quality”), the reasons for greater-than-average sensitivity include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because children, elderly people, and the infirm are more susceptible to respiratory distress and other air quality-related health problems than the general public. Residential areas are considered sensitive to poor air quality because people usually stay home for extended periods of time, with associated greater exposure to ambient air quality. Recreational uses are also considered sensitive due to the greater exposure to ambient air quality conditions because vigorous exercise associated with some forms of recreation places a high demand on the human respiratory system. Adoption and development under the Specific Plan would be required to implement any project-specific recommendations to reduce the potential health risk.”*

*“Toxic Air Contaminants (TACs) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer or serious illness) and include, but are not limited to, the criteria air pollutants listed above. Specifically, TACs include diesel particulate matter (DPM) (discussed below) emitted by diesel engines, and benzene and CO emitted by gasoline engines. Air pollution sources located near sensitive receptors are known to pose health risks. Sensitive receptors typically include land uses where individuals are susceptible to health risks when exposed to air pollution, including residences, day cares facilities, schools, medical facilities, and parks and recreational facilities. TACs are typically emitted by on- and off-road motor vehicles, stationary emission sources, and by industrial and commercial manufacturing. The California Office of Environmental Health Hazard Assessment (OEHHA) has identified several TACs that pose short-term (acute health risk), long-term (chronic risk), and/or carcinogenic health risks.”*

*“The primary sources of TACs identified within 1,000 feet of the Project site include the exhaust from diesel engines trucks in the area, and concentrations of DPM are higher*

*near heavily traveled highways and rail lines with diesel locomotive operations emissions from vehicles traveling on Highway 101, on-site generators at the City Police Station and Maple Street Correctional Center, and dust and particulates emissions associated with operation of the Graniterock facility. California Air Resources Board (CARB) guidance recommends a minimum buffer of 500 feet from the edge of freeways to sensitive receptors.”*

*“The proposed soccer fields would likely be developed approximately 480 feet north of the Highway 101 and 300 feet east of the existing railroad spur to Graniterock; the three-story Parking Structure A is proposed between where the railroad spur and where the soccer fields might occur. Given these distances compared to the recommended minimum buffer of 500 feet from the edge of freeways to sensitive receptors, the TAC exposure impact with this alternative is considered potentially significant, although a health risk screening analysis was not conducted not required for this alternatives assessment. New mitigation measures would be identified that could require preparation of a HRA to show if the health risk exceeds acceptable levels, or the Project would otherwise incorporate appropriate measures into the Project design to reduce the potential health risk due to exposure to TACs would be required with this alternative. .”*

Path Forward concurs with ESA that the use of an adult soccer field constitutes a recreational use and thereby, a sensitive use. The proposed outdoor soccer field (and outdoor play area for day care centers) would not meet the DEIR mitigation recommendations. We further note that it would be infeasible to mitigate exposure of particulate matter from Highway 101 and the upgradient Graniterock facility.

Furthermore, the referenced PM<sub>2.5</sub> concentration of 206 ug/m<sup>3</sup> at the upgradient Graniterock would result in an air quality index (AQI) of 256 (Very Unhealthy) according to the Air Now (EPA) Calculator (EPA 2019). AQI values between 201 and 300 trigger a health alert, meaning sensitive populations may experience more serious health effects. The Graniterock facility is located less than 100 feet from the proposed location of the adult soccer field.

The referenced concentrations of PM<sub>2.5</sub> at the upgradient Graniterock facility are more than an order of magnitude above the annual CARB standard of 12 ug/m<sup>3</sup> threshold. In addition, the 24-hour average Federal EPA standard of 35 ug/m<sup>3</sup> is exceeded. Furthermore, CARB (2015) states:

*“A data analysis from CARB's Children's Health Study shows health effects in children, as well. This study showed that in communities highly polluted with PM, children's lungs developed more slowly and did not move air as efficiently as children's lungs in clean air communities. Children and infants are susceptible to harm from inhaling pollutants such as PM because they inhale more air per pound of body weight than do adults - they breathe faster, spend more time outdoors and have smaller body sizes. In addition, children's immature immune systems may cause them to be more susceptible to PM*



*than healthy adults. Further research may clarify the relationship between PM exposure and children's health."*

Lastly, planting suitable trees and/or vegetation between sensitive receptors and pollution source has the potential to mitigate some exposure to particulate matter especially when combined with a regional approach; however, it is unlikely that a phytoremediation approach would be sufficient to mitigate ambient air quality issues due the Site's proximity to emission sources and the high levels of PM<sub>2.5</sub> documented in this area.

**CONCLUSIONS AND RECOMMENDATIONS**

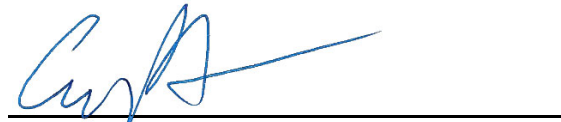
For the reasons presented in this Response (and DEIR), the above-referenced proposed theoretical alternative uses are not appropriate for the Site. Rather, non-active outdoor uses are more appropriate for the Development project. We recommend that the Mitigation Measures HAZ-1a and 1b be modified accordingly based on the updated information in this Response.

**CLOSING**

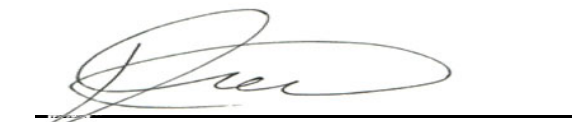
If you have any questions or comments in this Response, please do not hesitate to contact us.

Sincerely,

PATH FORWARD PARTNERS, INC.



Craig Pelletier, P.G.  
*Principal Geologist*



David A. Grunat, P.G., C.H.G.  
*Principal Geologist*

Enclosure:     References

cc:             Ms. Janette D'Elia, Harbor View Property, [idelia@jaypaul.com](mailto:idelia@jaypaul.com)



REFERENCES

- California Air Resources Control Board (CARB). 2015. *Ambient Air Quality Standards (AAQS) for Particulate Matter and Health (PM2.5 and PM10)*. Available: <https://www.arb.ca.gov/research/aaqs/pm/pm.htm>, Last reviewed October 29, 2015. Accessed January 31, 2019.
- ESA. 2019. *Draft Environmental Impact Report, Harbor View Project, SCH No. 2018012016, Prepared for City of Redwood City*. January.
- EPA. 2019. Available: <https://airnow.gov/index.cfm?action=airnow.calculator>. Accessed January 31, 2019.
- Path Forward. 2018. *Draft Removal Action Workplan (RAW). 320, 330, 340, 350, and 410 Blomquist Street; 19 Seaport Boulevard; 11, 15, 17, 19, 21, and 30 Stein Am Rhein Court; Redwood City, California*. December 7.
- RPS. 2018a. *Phase I Environmental Site Assessment, 320, 330, 340, and 410 Blomquist Street, 19 Seaport Boulevard, 11, 15, 17, 19, 21, and 30 Stein Am Rhein Court, Redwood City, San Mateo County*. March 30.
- RPS. 2018b. *Draft Removal Action Workplan (RAW), 320, 330, 340, 350, and 410 Blomquist Street, 19 Seaport Boulevard, 11, 15, 17, 19, 21, and 30 Stein Am Rhein Court, Redwood City, San Mateo County*. September 28.

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**Letter 12**      **Path Forward Environmental Engineering & Geology**  
**Response**      February 7, 2019

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12-1              Mitigation Measure HAZ-1b has been modified to better reflect the sequence of events necessary to occur prior to issuance of grading permits. Mitigation Measure HAZ-1b, on page 4.7-13 of the Draft EIR, is modified as follows:

**Mitigation Measure HAZ-1b:** Prior to the issuance of an occupancy permit, the Project applicant shall record a Land Use Covenant (LUC), in a form approved by the City, that requires that the SMP to be followed during future earthwork activities post-development. The LUC shall include conditional language describing when implementation of the SMP will be required for earthwork activities beneath either hardscaped areas or a beneath a specified thickness of clean fill or marker fabric required for non-hardscaped areas. The LUC shall also include language to prohibit the use of groundwater beneath the Project site.

This modification to Mitigation Measure HAZ-1b does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR or any new significant information. No additional analysis is required.

12-2              This comment restates information that has already been disclosed in the Draft EIR (see Section 5.5.6 of the Draft EIR, *On-site Public Amenities Alternative*) and therefore does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR. The Draft EIR fully assessed and disclosed the limitations of the On-Site Public Amenities alternative as they relate to sensitive air quality receptors at the site. No further response is required.



February 1, 2019

Steven Turner  
Redwood City Planning Manager  
Tenth Street Place, Third Floor  
1017 Middlefield Road  
Redwood City, Ca 94063

Ref: Gas and Electric Transmission and Distribution

Dear Mr. Turner,

Thank you for submitting Harbor View Project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: [https://www.pge.com/en\\_US/business/services/building-and-renovation/overview/overview.page](https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page).
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team  
Land Management

### Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <http://usanorth811.org/wp-content/uploads/2017/05/CA-LAW-English.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [ $24/2 + 24 + 36/2 = 54$ ] away, or be entirely dug by hand.)



Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes,



service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

## Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. **Buildings and Other Structures:** No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING.**"
2. **Grading:** Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. **Fences:** Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&E's facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. **Landscaping:** Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. **Reservoirs, Sumps, Drainage Basins, and Ponds:** Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. **Automobile Parking:** Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. **Storage of Flammable, Explosive or Corrosive Materials:** There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.
8. **Streets and Roads:** Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for



proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 ([http://www.cpuc.ca.gov/gos/GO95/go\\_95\\_startup\\_page.html](http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html)) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



**Letter 13**      **Pacific Gas & Electric**  
**Response**      February 1, 2019

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- 13-1              This comment essentially outlines the requirements applicable to projects that are seeking natural gas and electric connections to PG&E facilities. The City appreciates PG&E's interest in the Project. The Project sponsor is required to work with PG&E during the development process to ensure that all applicable requirements are met. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.



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675 Seaport Boulevard, Redwood City, CA 94063

March 8, 2019

**SENT BY EMAIL**

Steven Turner, Planning Manager  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94064-0391

**Subject: Harbor View DEIR Comments**

Dear Mr. Turner:

Following are comments on behalf of Seaport Industrial Association (SIA) regarding the Draft Environmental Impact Report (DEIR) for the proposed Harbor View project. SIA is a business organization whose members include the industrial companies along Seaport Blvd. and Blomquist St., as well as the Port of Redwood City.

SIA and its members participated actively in the public process related to the Inner Harbor Specific Plan, including as participants on the IHSP Task Force, where we first became aware of the Inner Harbor project. SIA supports the City's vision for a vibrant, mixed-use Inner Harbor area that helps connect the community to the waterfront. SIA's comments focus on two main issues and impacts: traffic circulation and safety, and compatibility with the surrounding port industrial area.

The Inner Harbor Area is immediately adjacent to heavy industry and the port area. The City understands that its working port and industrial sector are vital assets for Redwood City and the broader Silicon Valley region. Non-industrial development in the port area, particularly at Pacific Shores Center, has been successful because of the City's early insistence on proactive planning and design for land use compatibility.

**Land Use**

SIA appreciates that the Harbor View project is conscious of compatibility issues in its design decisions, reflected in the project goals (p. 3-13):

*"-Cluster development to provide adequate buffer to adjacent industrial uses.*

*- Plan for land use and circulation compatibility with adjacent institutional, industrial, and port-dependent uses, through effective building placement, orientation, and screening."*

Harbor View Draft Environmental Impact Report  
March 8, 2019

Suggested Change: SIA recommends modifying the project description with respect to surrounding uses. There should be much more description of Port industrial activities, the value of the Port to the city and community, and the broader planning context of the project in relation to the Port and its single point of access at the Seaport Blvd/Highway 101 interchange. Specifically, the EIR should describe Seaport Boulevard as an industrial/truck corridor adjacent to the project, and the Port of Redwood City as a source of essential goods to the Peninsula and Silicon Valley. Reference to the Port and associated heavy industry should be more detailed in the following sections.

14-1

- Section 4.1.1 (North and East)
- Section 4.1.2 Regulatory Setting

Suggested Change: SIA recommends adding the following policies to the list of General Plan policies that are applicable to the project in section 4.1.2 “Regulatory Setting,” Section 4.9 “Land Use and Planning,” and in Table 4.9-1 “Consistency with Applicable General Plan Land Use Policies and Other Applicable Regulations or Plans.” The EIR should study the impact on each of these programs and policies:

**Policy BE-10.4:** Consider the design of Mixed Use-Waterfront neighborhoods and relationship to the Port Area and Port uses.

**Policy BE-21.1:** Allow for growth and intensification of industrial uses in the Port Industrial Center.

**Policy BE-21.4:** Maintain railroad rights-of-way for materials transport and potential transit use.

14-2

**Program BE-22:** Land Use/Neighborhood Transitions. Through design guidelines, strive to attain development in Waterfront Neighborhoods that minimizes potential conflicts with the Port area’s industrial uses.

**Policy BE-22.2:** Apply the following performance criteria and standards, as applicable, to all new development projects, with the level of application commensurate with the scale of development. *[The policy lists a variety of performance criteria, including:]* Uses proposed must clearly be compatible with surrounding established and planned uses.

**Policy BE-30.1:** Minimize potential conflicts between trucks and pedestrian, bicycle, and transit access and circulation on streets designated as truck routes.

**Policy BE-30.2:** Minimize potential conflicts between truck loading and unloading and pedestrian, bicycle, and transit access and circulation.

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March 8, 2019

**Policy BE-32.4:** Maintain the Port of Redwood City as a critically important use, and protect long-term Port, Port-related, and surrounding industrial uses from the encroachment of incompatible land uses as appropriate.

↑ 14-2  
cont.

Suggested Change: SIA recommends that the EIR study land use compatibility with the Port of Redwood City and its associated industrial activities. The DEIR implies that compatibility with adjacent port/industrial uses is an impact to be considered, insofar as compatibility is included in the project goals, and mitigation includes “clustered development adequate to buffer adjacent industrial uses” (p. 4.2-24). While the DEIR asserts that the impacts of the project are less than significant (LU-1, LU-2, LU-1.CU), there is no indication in the text regarding the analysis of these impacts or the basis for the conclusion. The FEIR should include this analysis.

14-3

Concern: SIA is concerned about the proposed loss of land designated for industrial/port use in the General Plan and the proposed change of zoning from industrial/port use. With the General Plan, City leaders and the community wisely adopted a long-range planning document that anticipated the need for light and heavy industrial uses, understanding the challenge of maintaining these land uses and balancing the demand for office development. SIA encourages the City and community to think carefully about changing industrial and port-related uses at a time when the Port is thriving and seeking to expand its capacity.

14-4

**Traffic Circulation**

Existing and future development in the Inner Harbor area will share a roadway system with the port industrial area. The Port is a multi-modal transportation hub that moves high volumes of cargo by ship, rail and trucks through the Woodside Road freeway interchange to serve the entire Peninsula and Silicon Valley.

The project will add traffic volume of all types at the Highway101/SR84 interchange. This is the only point of access for trucks going to and from the port industrial area, and would be the primary point of access to and from the proposed project.

The traffic analysis should take accurate account of current and future truck volumes, as well as the interaction of cars and trucks near the freeway interchange. Special consideration should be given to the safety of bringing substantial numbers of cars, bicyclists and pedestrians onto roadways and intersections with heavy truck traffic. As noted above, the General Plan gives specific attention to this issue (policies BE-30.1 and BE-30.2).

14-5  
↓

Concern: The general conclusion of the traffic analysis is that congestion impacts will be “significant and unavoidable” at a number of intersections and freeway segments that already operate at Level of Service F. Elected officials will decide whether the project benefits warrant additional traffic congestion. The traffic analysis should be realistic to inform their decision. SIA is concerned that the analysis underestimates truck volume, for several reasons:

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March 8, 2019

1. The traffic counts are from “a typical weekday in April 2017.”
2. Cargo volume and truck traffic has increased significantly since this date, and volume from the Port and industrial businesses is projected to increase further. The traffic analysis does not appear to take this growth into account.
3. Data from a weekday in April is not representative of annual traffic volume, nor peak seasonal traffic volume. Summer is peak season for building materials transport, including from the Port and industrial businesses along Blomquist. Counts from April would almost certainly underestimate annual truck volume.
4. Peak daily hours for truck traffic are not the same as for cars. Truck traffic tends to start earlier in the day, both for AM and PM peaks. Treating the peak morning traffic hours as 7-9am and peak afternoon hours as 4-6pm may miss earlier peak truck trips that intersect with commuter traffic. Because the interaction of cars and trucks is the most important factor in estimating traffic flow accurately for the project area, the EIR should address this issue directly and explicitly.
5. The traffic analysis should account for the timing of vessels in port. In April 2017, ships called on the Port on April 11-12, 14-16, 22-23. What day was the traffic analysis conducted, and did it account for truck traffic when a ship was in port?



14-5  
cont.

Concern: For nearly all the intersections that will see significant and unavoidable impacts, the primary mitigation is contingent upon, and makes assumptions about, the Woodside Road Interchange Improvement Project. The analysis of the following impacts in the DEIR is dependent on the design and impact of the future interchange: TRANS-1, TRANS-2, TRANS-4, TRANS-7, TRANS-8, TRANS-13, TRANS-15, TRANS-22, TRANS-23, TRANS-29



14-6

It is difficult for policy makers or the public to evaluate these impacts and mitigations without assurance that the Woodside Road Interchange Improvement Project will move forward. SIA strongly supports the interchange project, and we encourage City leaders to connect the analysis, approval and funding of that project to the proposed development.

We look forward to continued participation in the planning process. Thank you for your consideration of our comments.

Sincerely

Greg Greenway  
Executive Director  
Seaport Industrial Association

**Letter 14**      **Seaport Industrial Association**  
**Response**      **March 8, 2019**

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14-1                      In response to the comment, the Draft EIR has been modified in the second paragraph of page 4.1-2, as follows:

Areas nearest to the Project site are heavy industrial/commercial and construction equipment business uses, railroad tracks, and freeway and access to the Port of Redwood City via Seaport Boulevard. The industrial character to the north and east of the Project site includes large heavy industry facilities associated with Graniterock, Peninsula Building Materials, railroad tracks, and the Cargill salt evaporation ponds further east. The main east-west roadway along the northern frontage of the site is Blomquist Street, which is improved with consistent paving, curbs and sidewalks on the south side of the street. Uses along Blomquist Street include industrial and commercial businesses and associated heavy truck traffic, as well as the closed and demolished Malibu Golf and Grand Prix recreational facilities. Well-maintained fencing (chain link and wire/wood types) exists in front of the building materials storage uses along this road. A solid stone wall is present along the Blomquist Street frontage of the Graniterock concrete operation. Some landscaping and street trees are present along Blomquist Street, with decorative treatments and wider landscaped buffers between the sidewalks and property fencing/walls nearing Seaport Drive.

This modification does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR or add any new significant information. No additional analysis is required.

14-2                      Per the comment, the following additional polices with which the Project is considered consistent have been added to Table 4.9-1, as shown in Chapter 4 of this Final EIR:

• <u>BE-21.1: Allow for growth and intensification of industrial uses in the Port Industrial Center.</u>
• <u>BE-21.4: Maintain railroad rights-of-way for materials transport and potential transit use.</u>
• <u>Program BE-22: Land Use/Neighborhood Transitions: Through design guidelines, strive to attain development in Waterfront Neighborhoods that minimize potential conflicts with the Port area's industrial uses.</u>
• <u>Policy BE-22.2: Apply the following performance criteria and standards, as applicable, to all new development projects, with the level of application commensurate with the scale of development. [The policy lists a variety of performance criteria.] Uses proposed must clearly be compatible with surrounding established and planned uses.</u>
• <u>Policy BE-30.1: Minimize potential conflicts between trucks and pedestrian, bicycle, and transit access and circulation on streets designated as truck routes.</u>

- |   |
|---|
| <ul style="list-style-type: none"> <li>• <u>Policy BE-30-2: Minimize potential conflicts between truck loading and unloading and pedestrian, bicycle, and transit access and circulation.</u></li> </ul>  |
| <ul style="list-style-type: none"> <li>• <u>Policy BE-32.4: Maintain the Port of Redwood City as a critically important use, and protect long-term Port, Port-related, and surrounding industrial uses from the encroachment of incompatible land uses as appropriate.</u></li> </ul> |

This modification does not alter the conclusions of the Draft EIR, nor does it raise any additional environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.

- 14-3 The findings of less-than-significant impacts for land use compatibility were based on specific design criteria that has been incorporated into the Project to mitigate against potential conflicts. Building setbacks, landscaping shielding, and additional shielding provided by the Project's parking garages will provide buffers between the occupants of the Project site and the nearby industrial operations. Extensive areas of similar non-industrial development are also present adjacent to existing industrial and Port operations further north of the site along Seaport Boulevard. No additional analysis is required.
- 14-4 Refer to Master Response 4 in Chapter 5 of the Final EIR. This comment conveys the opinion of the commenter as to how the Project should be developed, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.
- 14-5 The traffic analysis evaluated the one-hour periods when traffic (including automobiles and trucks, classified separately) on the entire roadway system reaches its peak volumes, not just the roadways adjacent to the site. The peak traffic hours for the Project occur during the same hours, between 7 and 9 am and between 4 and 6 pm, and were therefore selected for analysis. April is considered a typical month to conduct counts because area schools are in session. Conducting counts in the summer would result in lower than typical volumes at many of the study locations. The Notice of Preparation (NOP) was posted in 2017, and the counts were conducted shortly thereafter. The cumulative analysis includes projections to 2040 and would account for growth in traffic from the Port and industrial businesses. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.
- 14-6 For many impacts identified in the Draft EIR, as noted by the commenter, the mitigation measure is listed as contribution towards the construction of the 101/84 interchange. Since the proposed Project is only responsible for paying its fair share contribution towards the interchange improvements and additional funding is uncertain, the impacts remain significant and unavoidable. This

comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.





Sequoia Audubon Society  
PO Box 620292  
Woodside, CA 94062-0292  
<http://www.sequoia-audubon.org>

February 8, 2019

Mayor Bain and Members of the Redwood City City Council  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063  
Via email: [council@redwoodcity.org](mailto:council@redwoodcity.org)

**RE: Harbor View Proposal - Study Session February 11, 2019**

Dear Mayor Bain and Redwood City Council Members:

Sequoia Audubon Society is the San Mateo County chapter of the National Audubon Society. I comment on behalf of our 1500 members. Our mission is to "protect native birds and other wildlife and their ecosystems in San Mateo County...".

We have had an opportunity for a preliminary review of the draft environmental impact report (DEIR) on the Harbor View Project. We are concerned about the many negative impacts cited for this project, not the least of which is the impact of increased traffic at an already heavily impacted intersection.

Our major concern, however, is the potential **environmental impact**. Adding a huge office development north of 101 re-opens the issue of filling in the adjacent Cargill Salt ponds for high density housing development instead of Bay restoration and needed resilience against sea level rise as restored wetlands.

The Cargill Salt ponds are an important roosting and foraging habitat for shorebirds and waterfowl. eBird data has been collected on the Cargill Salt ponds since 2012. During that time 61 species of birds have been reported including western snowy plover. This population is federally listed as threatened under the Endangered Species Act and a Bird Species of Special Concern in California. While we realize that this property is not under consideration at this time, to repeat, we believe that the Harbor View project would put pressure on the issue of developing the Salt Works project, which Sequoia Audubon and Redwood City residents have resisted.

15-1

Sequoia Audubon joins with many other environmental organizations in encouraging the council to reconsider its prior decision and express opposition to a General Plan Amendment and to **not move forward** with this project.

Thank you for giving our comments your careful consideration.

Sincerely,

*Leslie Flint*

Leslie Flint  
Chair, Conservation Committee  
Sequoia Audubon Society  
(650) 619-0836 (cell)

**Letter 15**      **Sequoia Audubon Society**  
**Response**      February 8, 2019

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- 15-1            The commenter is speculating about potential effects that could occur to an offsite property that is not associated with the proposed Project. The comment is therefore outside of the scope of the Draft EIR. The comment is noted, but the comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, and no additional analysis is required.



Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties

February 8, 2019

Mayor Bain and Members of the Redwood City City Council  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063  
Via email: council@redwoodcity .org

**Re: Harbor View Proposal - Study Session Feb 11, 2019**

Dear Mayor Bain and Redwood City Council Members

The Sierra Club has had an opportunity for a preliminary review of the draft environmental impact report (DEIR) on the Harbor View project.

We offer the following early observations in the hope that they may be timely for the study session this coming Monday February 11, 2019.

*At this point, we only raise a few major concerns rather than going into details of the various environmental impacts.*

- It is clear from the draft environmental impact report, that the proposed development provides no or few positive environmental impacts
- It is also clear that this massive office development would have many negative impacts that will be **significant and unavoidable for Redwood City**

A preliminary review reveals that the DEIR appears to have some important inconsistencies and weaknesses in its approach, therefore delivering possibly misleading conclusions

Questions on traffic assumptions:

- **Conflicting assumptions that understate traffic:** Traffic VMT analysis is based on an estimate of 3434 employees at the site, however the jobs housing analysis clearly assumes 4579 employees. This implies the traffic is understated possibly by 25 to 33%.
- **If tech jobs, employee count is closer to 8,000 employees:** The traffic VMT analysis is based on 3434 employees. In reality, the project could have tech jobs at 150 sf/employee, as currently assumed in other peninsula cities and **1.2 million sf actually generates closer to 8,000 employees**. This was pointed out in some comments last year, however the DEIR does not address this very real possibility.
- **If tech jobs, traffic could be greatly understated:** If actual estimate is 8,000 employees, assuming tech jobs, instead of 3434 employees, traffic could be vastly understated by a factor as high as 250%. This understates the problem significantly.

16-1

Problems with Housing assumptions:

- Housing impact demand is shown as **2043 units**, which is not reflective of the projects assumed 4579 employees. If the employee estimate should be 8,000 employees, assuming tech jobs, the impact is obviously greater. This is a serious undercount.
- It assumes there is no jobs/housing problem as 3333 new housing units would be supplied In Redwood City by 2023. However, it **fails to point out demand created by the various other office projects** that will be built in the next 5 years
- It also, significantly, fails to point out that, of these 3333 units, **2000 have already been completed (or are being built) and should, therefore, not be counted on for the project.**

16-2

Hydrology and Sea Level Rise questions:

- In the event of anticipated Sea level rise, it fails to analyze where the all project’s site drainage water will possibly be collected in the future.

16-3

Liquefaction

- While the project buildings can be built to survive seismic liquefaction, using piers to support the structures, it fails to note that the surrounding infrastructure, safety and access for the site will be compromised, as the entire area is very poorly compacted fill land.

16-4

We therefore have the following General Observations for your consideration

1. The EIR appears to base its findings on some **flawed assumptions.**
2. There is **no positive environmental impacts and no feasible way to lessen or avoid the negative significant effects** of the project. Also, expected **public benefits do not outweigh** the significant environmental impacts of the project.
3. **This 1.2 million sf proposal will move the focus of office development from downtown to north of 101:** The Downtown Precise Plan was based on about 1 million sf commercial office. The downtown area is where office development needs to be aggregated to provide access to transit and reduce auto use and also to support future improvements in transit options.
4. **Changing the General Plan, zoning and raising the height limits** on a large parcel along the light industrial corridor could have a domino effect, **generating further land speculation** in the light industrial area along Seaport Boulevard. Over the years this would affect the viability of the Port and its supporting heavy and light industry
5. **Cargill Salt Ponds should not be developed.** Adding a huge office development north of 101 re-opens the issue of filling in the adjacent Cargill Salt ponds for high density housing development, instead of Bay restoration and needed resilience against sea level rise as restored wetlands.
6. **There is a social and economic component**, as the Port and related businesses provide economic diversity in jobs with stable well paying blue-collar jobs. These provide **long term economic resilience** that the short-term construction jobs, generated by the project, will not be able provide.

16-5

16-6

16-7

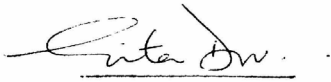
16-8

16-9

16-10

For these preliminary reasons, we request that the Redwood City Council consider **not moving forward** further with this proposal as it is the wrong project in the wrong place for Redwood City.

Respectfully submitted:

A handwritten signature in black ink, appearing to read "Gita Dev", written over a horizontal line.

Gita Dev  
Sierra Club Loma Prieta- Sustainable Land Use Committee

Cc James Eggers, Exec. Director, Sierra Club Loma Prieta  
Gladwyn D'Souza, Conservation Committee SCLP

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**Letter 16**      **Sierra Club, Loma Prieta Chapter**  
**Response**      February 8, 2019

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- 16-1            Refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project's employment density.
- 16-2            Refer to Master Response 1, of this Final EIR, which addresses the Project's employment density, as well as Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.
- 16-3            With respect to the comment for the treatment of sea level rise related impacts, refer to Master Response 2 in Chapter 5 of the Final EIR, which addresses the EIRs treatment of flooding impacts related to sea level rise. With respect to the commenters concern for impacts related to stormwater runoff, see the response to comment 5-4, above, which addresses the Draft EIRs consideration of stormwater related impacts.
- 16-4            A review of impacts to offsite infrastructure from liquefaction is outside the scope of this EIR, and of CEQA generally. Effects on future Project users due to existing geological, soils, or seismic conditions that would be not exacerbated by the proposed Project are outside the scope of CEQA [see *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4<sup>th</sup> 369.]. While of interest to planners and service providers, CEQA is not the appropriate forum to address these types of topics. This comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.
- 16-5            This comment provides no specific examples of the assumptions in the Draft EIR that the commenter believes to be flawed. As such, no response can be provided.
- 16-6            Refer to Master Response 4 in Chapter 5 of the Final EIR. This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project. No additional analysis is required.
- 16-7            This comment conveys the opinion of the commenter as to where office development should be located. The comment does not raise any new environmental issues that have not already been adequately addressed in the Draft EIR, and no further response is required.
- 16-8            This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that

have not been adequately addressed in the Draft EIR. No additional analysis is required.

16-9 See the response to comment 16-8, above.

16-10 This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis is required.

**From:** [Elizabeth Adam](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#); [Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Saturday, February 09, 2019 7:14:44 AM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

As a resident of Oakland that has neighbors commuting to the Peninsula to work, adding that many jobs without housing, in a flood plain, makes no sense for the health of the region. If the region becomes too cumbersome for employees to live in, talented people will not live here. Residents eventually give up when faced with high housing costs, impossible traffic that makes childcare difficult, the inability to find schools close to work and housing. This project would further inconvenience Bay Area families.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Elizabeth Adam  
Oakland 94619



**Letter 17**      **Elizabeth Adam**  
**Response**      February 9, 2019

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17-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the Project’s proposed employment, see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the comments related to traffic impacts, refer to Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to this environmental impact topic.

**From:** [Ellen Alberstat](#)  
**To:** [GRP-City Council](#)  
**Date:** Thursday, February 07, 2019 9:04:07 AM

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Please do not do the study on soil  
Fondly  
Dearmorgan @att.net

Sent from my iPhone

**Letter 18**      **Ellen Alberstat**  
**Response**      February 7, 2019

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- 18-1              This comment request preparation of a soils study. As described in Section 4.5, *Geology and Soils*, of the Draft EIR, the analysis of the Project was based on the conditions likely present based on nearby geotechnical investigations. Most notable, the site is in a seismically active region, and all Project construction would meet the latest standards of the California Building Code (CBC) and applicable City ordinances and policies and consistent with the most recent version of the CBC. Located in an area with soils deemed highly susceptible to liquefaction hazards, a site-specific geotechnical investigation would identify geotechnical design measures to minimize hazards related to such soil conditions and ensure less-than-significance impacts. See Impacts GEO-1.HV through GEO-4.HV.

From: Mari Aldridge  
To: GRP-City Council  
Subject: Save Our Precious Local Baylands  
Date: Monday, February 11, 2019 11:31:14 AM

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Mari Aldridge  
North Fair Oaks, CA



Virus-free. [www.avast.com](http://www.avast.com)

**Letter 19**      **Mari Aldridge**  
**Response**      February 10, 2019

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19-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Nabeel Al-Shamma](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Development  
**Date:** Sunday, February 10, 2019 9:47:49 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted.

In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

Yet another major concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, requires over 2,000 homes to support it. Developing massive offices north of 101, will put pressure on providing housing on the north side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community in the recent past.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Nabeel Al-Shamma  
Mountain View

**Letter 20**      **Nabeel Al-Shamma**  
**Response**      February 10, 2019

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20-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** Carol Bartlett <[carolbart@hotmail.com](mailto:carolbart@hotmail.com)>  
**Subject:** Harbor View Project  
**Date:** February 8, 2019 at 1:50:03 AM PST  
**To:** "[council@redwoodcity.org](mailto:council@redwoodcity.org)" <[council@redwoodcity.org](mailto:council@redwoodcity.org)>

To the Planning Commission and Council of Redwood City:

As I am unable to attend the upcoming public meeting regarding the Harbor View project, I wish to express my views.

The proposed complex on the old Malibu Grand Prix site is terrible & would do harm to the wetlands, Redwood City, and other mid-Peninsula commuters. It's irresponsible to consider allowing construction of such a big commercial development that would generate the projected amount of vehicular traffic.

The Whipple Ave intersection @ E. Bayshore & 101 is already congested & has become problematic for residents of Bair Island. Traffic generated by the Courtyard Marriott increased to their traffic problems and adding a huge business complex would make things worse. The prospect of another 5,000 cars using the already crowded ramps for 101 access @ Whipple is frightening. Nothing that big should be considered unless 101 gets about 3 more lanes in each direction, which won't happen in our lifetimes. Excessive local commercial & residential development has made traffic a nightmare.

I've lived in downtown Redwood City for 11 years and seen the negative changes in traffic congestion on both local streets & 101 increase to a very unpleasant level. It's easy to say, "Take public transportation, bicycle, walk, etc," but we well know that those options can't always meet our needs. It's a long way from the CalTrain station to the site of this ill-advised behemoth. I frequently see emergency vehicles terribly slowed by clogged traffic, causing what may be life-threatening delays for help from first-responders.

Redwood City has, frankly, gone nuts in allowing so many large apartment buildings downtown since the streets are still as narrow as ever. Daylight planes have changed on Jefferson and other streets. It's getting tough to move around town. It often takes a couple of signal cycles to get through major intersections on El Camino even when it isn't rush hour. The newest apartments (Indigo, 229 Franklin, Hoxton, & the 3 - 4 year never-ending construction at Jefferson & Franklin, plus the new one where Williams & Burroughs was) are all under-parked. The new commercial building in the 800 block of Main Street was approved with less parking than is realistically needed for the expected number of employees.

I suspect that municipal greed for developer fees has allowed excessive construction here with little regard for the overall effect on the residents and our environment. If the Harbor View proposal, which offers no housing to moderate its negative traffic impact, gets a green light, I'll be convinced that greed or, worse, undisclosed business/personal relationships or interests of some decision makers is a factor in allowing it to go forward.

A better use of that land might be expanding the harbor area & building a marina which can accommodate larger vessels. Coyote Point Marina has only 3 slips for 40 ft boats (one of which



is always kept free for visitors) & one end-of-dock space for anything bigger. Coyote Point, Oyster Point, West Point, and Brisbane marinas all have waiting lists, so there's many local residents are presently able to enjoy.

Yours truly,

Carol Bartlett

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**Letter 21**      **Carol Bartlett**  
**Response**      February 8, 2019

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21-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to traffic, land use and zoning, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. No additional analysis or response is required.

**From:** [Gail Barton](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Monday, February 11, 2019 3:05:41 PM

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I am opposed to the Harbor View plan. The developers think they can do anything they want, ignoring the established general plan. I attended their presentation & found them to brush off the consequences. We have so many already approved projects, with future impacts still unknown. Voters are now paying more attention to climate change/chaos & sea level rise. The City should not be considering this type of development in a flood zone. thank you

**Letter 22**      **Gail Barton**  
**Response**      February 11, 2019

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22-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to floodplains and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.

**From:** [Gary Bea](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harborview Project  
**Date:** Saturday, February 09, 2019 2:12:31 PM

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As a Sunnyvale resident, I have a very real feel for what can happen when similar projects on the bay side of highway 101 are approved. A virtual island of towering buildings appears. This has resulted in a great increase of jobs in the area but at the expense of very little increase in nearby housing. Unless studies indicate existing housing and timely projects in the vicinity will provide appropriate housing, schools and transportation, this project should not be approved. Gary Bea

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**Letter 23**      **Gary Bea**  
**Response**      February 10, 2019

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23-1            To the extent this comment addresses housing supply, refer to Master Response 3 in Chapter 5 of this Final EIR, which addresses the Draft EIR’s consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Jeanne Benioff](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Sunday, February 10, 2019 7:09:24 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Jeanne Benioff  
Redwood City 94062

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**Letter 24**      **Jeanne Benioff**  
**Response**      February 10, 2019

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24-1            The commenter notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Diane Bigler](#)  
**To:** [GRP-City Council](#)  
**Subject:** Do NOT Amend General Plan to Accommodate Harbor View Project  
**Date:** Sunday, February 10, 2019 7:48:53 AM

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We urge you not to approve the General Plan Amendment and Zoning Change to allow the Harbor View Project proposal for the following reasons:

The Whipple and Woodside/Seaport interchanges At 101 already have some of the worst traffic congestion in the Bay Area. Why make it worse?

Rising sea levels due to climate change will need to be remediated with marsh lands to protect the rest of Redwood City. Why build more near the shoreline?

Adding 5,000 jobs without comparable housing will increase commuting into Redwood City, thereby increasing air pollution and traffic congestion.

Redwood City has the only deep water port in the South Bay. That is Redwood City's most unique and valuable asset. Changing the zoning from light industrial to commercial would permanently compromise that asset.

Please do NOT approve a change to the general plan nor zoning!!!

Diane and Mike Bigler

Sent from my iPhone

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**Letter 25**      **Diane Bigler**  
**Response**      February 10, 2019

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25-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Patricia Blevins](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Monday, February 11, 2019 12:25:38 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Patricia Blevins  
San Jose 951181808

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**Letter 26**      **Patricia Blevins**  
**Response**      February 11, 2019

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26-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. The commenter also notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** Barbara Bonilla  
**Sent:** Thursday, February 14, 2019 2:59 PM  
**To:** GRP-City Council <[council@redwoodcity.org](mailto:council@redwoodcity.org)>  
**Subject:** Support Letter for Jay Paul Harbor View Capus

My name is Barbara Bonilla, ED of the San Mateo County Sheriff's Activities League. I am writing in support of the Jay Paul Harbor View project in its current form. SAL serves about 11,000 county youth annually; most of them at-risk and living in low income neighborhoods. Our participants included many youth and families from Redwood City proper, who can't afford the high cost of other soccer clubs and other programs.

One of our largest and most impactful programs are youth soccer and rugby. To participate, players are required to maintain their grades or attend tutoring, uphold behavioral standards, attend workshops and give back to their community. The program has changed many lives and offered the opportunity for college for many students who otherwise would not attend.

An ongoing challenge is finding enough field space to accommodate practice and games. This has a direct effect on our ability serve youth. The current proposed Harbor View campus plan includes a potential field for public use along with 5 acres of public park. These amenities reflect the public input that the developer has taken into consideration.

I would also like to encourage the council to consider the \$12 million affordable housing commitment and \$8 million commitment to youth services that the developer has committed to under the current project plan. The communities we serve will directly benefit from these commitments.

Thanks  
Barbara Bonilla

**Letter 27**      **Barbara Bonilla**  
**Response**      February 14, 2019

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- 27-1              Please see Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Helga Boyle](#)  
**To:** [Council-Ian Bain](#)  
**Cc:** [GRP-City Council](#)  
**Subject:** Regarding Harbor View Project  
**Date:** Friday, February 08, 2019 2:10:52 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration,

Helga Boyle

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**Letter 28**      **Helga Boyle**  
**Response**      February 8, 2019

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28-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [mabraude@aol.com](mailto:mabraude@aol.com)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project Comment  
**Date:** Sunday, February 10, 2019 4:50:36 PM

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Dear Mayor Bain and City Council Members,

I am writing today to urge you to end your consideration of the massive Harbor View project. This project will add more than 4,500 employees in Redwood City and significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange. Major new office developments should be located near transit centers to reduce driving, not out by the Redwood City Port, where it's important to keep port-related industries viable.

In addition, the development site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Michael Braude  
Menlo Park

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**Letter 29**      **Michael Braude**  
**Response**      February 10, 2019

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29-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Jordan Briskin](#)  
**To:** [GRP-City Council](#)  
**Subject:** Protect the Bayfront  
**Date:** Thursday, February 07, 2019 8:58:55 AM

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Dear Mayor Bain and City Council members,

Do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

It behooves you to not continue forward with this project, which is the wrong project in the wrong place.

Sincerely,  
Jordan Briskin  
Palo Alto, CA

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**Letter 30**      **Jordan Briskin**  
**Response**      February 7, 2019

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30-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Laura Brown](#)  
**To:** [CD-Steven Turner](#); [GRP-City Council](#)  
**Subject:** Opposition to Harbor View project  
**Date:** Tuesday, February 12, 2019 2:11:52 PM

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City Council Members and Planning Manager Turner,

I'm writing to voice my opposition to changing the General Plan to allow development of the proposed Harbor View office campus. I attended last night's City Council meeting, and I appreciate the opportunity to see a presentation of the EIR and hear public comment. I agree with many of the comments from members of the public in opposition to the project. I'm concerned about the impact on traffic, our jobs/housing imbalance, and the economic diversity we could lose by putting office/tech space in a previously industrial zone.

Most of all, I'm extremely concerned about the impact that sea level rise will have on any development east of 101 in Redwood City. As Alice Kaufman and Carol Cross said, adding more development to what will most certainly be a flood zone in the future is not a good idea. I ask the council to seriously look at any development in this area, but particularly those as large as Harbor View. Allowing such a large development, with so many potential new commuters, in this area would be to simply ignore the plain fact that sea level rise is coming, and coming quickly.

Please reject Jay Paul's proposal to change the zoning for this area, and reject the Harbor View project development.

Thank you,  
Laura Brown, Redwood City resident

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**Letter 31**      **Laura Brown**  
**Response**      February 7, 2019

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31-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Pascal Bruyere](#)  
**To:** [GRP-City Council](#)  
**Subject:** review process for the Harbor View project.  
**Date:** Thursday, February 07, 2019 8:49:29 AM

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Dear Mayor Bain and City Council members,

I am a long time resident of Sunnyvale and regular user of the Redwood City harbor: sailing, kayaking, canoeing...

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration

Pascal Bruyere,  
Sunnyvale

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**Letter 32**      **Pascal Bruyere**  
**Response**      February 7, 2019

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32-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Fred Butts](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 7:46:26 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Fred Butts  
Mountain View 94040

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**Letter 33**      **Fred Butts**  
**Response**      February 8, 2019

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33-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. The commenter also notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Docktown-Lee Callister](#)  
**To:** [GRP-City Council](#); [MGR-Melissa Stevenson Diaz](#)  
**Subject:** Harbor View Project  
**Date:** Sunday, February 10, 2019 1:28:27 PM

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Dear Council Members

I want to add my voice to the many people and organizations urging you to reject this EIR and stop any further attempts to push the proposed Harbor View Development down our throats. Please make it clear once and for all that Redwood City is not for sale, and that you won't let developers generate huge profits on the backs of the people you represent by degrading the city we love.

To be sure, many of the perks J. Paul and his minions are offering are worth having. The Blomquist extension has been on the city's wish list for years. We all know housing is woefully inadequate. 10 Million to improve the 101/Woodside interchange would certainly help. And it's nice that he has tossed a few million dollars into pots for children's playgrounds and soccer fields. But at what cost?

None of the benefits offered individually or in the aggregate can begin to make up for the short- and long-term damage this project would inflict upon the City.

The Gridlock it would create on freeways and city streets alone is horrific enough to reject it, and the solutions offered are only crumbs compared to the additional needs it would create, exacerbating traffic problems and our housing imbalance rather than helping solve these problems.

The project would further degrade the natural environment, not lead us into the future, polluting and further clogging the Seaport corridor.

Revising the General Plan and zoning to allow this to happen would set a dangerous precedent for other developers looking to profit from similar tactics,

We are trusting you to do the right thing for us and future generations. Please reject this EIR as inadequate, misleading, and unworthy, and close the door to any further attempts by J. Paul to buy approval for this monstrous mistake.

Best regards

Lee Callister

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**Lee Callister**  
415.883.0449

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**Letter 34**      **Lee Callister**  
**Response**      February 10, 2019

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34-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to traffic impacts, refer to Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic.

**From:** [Monty Cleeves](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Friday, February 08, 2019 9:54:15 AM

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I'm a 40 year resident of Redwood City. I've have not been enthused about the dramatic changes to downtown, but I understand that focusing development around transit resources makes sense as the population continues to grow. Please continue that work by putting the jobs by the transit also. Put the 4500 jobs proposed by the Harbor view project within walking distance of the train station, otherwise you are wasting the good start you've made on fixes to our growing transportation problems

Thank you  
Monty Cleeves

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**Letter 35**      **Monty Cleeves**  
**Response**      February 8, 2019

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35-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to traffic impacts, refer to Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental topic. With respect to the project's employment density, see Master Response 1.

**From:** MaryAnn Clifford <[msmarimac@gmail.com](mailto:msmarimac@gmail.com)>  
**Subject:** Harbor View Project  
**Date:** February 7, 2019 at 9:41:08 PM PST  
**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and Redwood City Council,

I am writing to ask you to say NO to the proposed Harbor View Project at the former Lyngso-Malibu Grand Prix site.

I am very familiar with this area as I walk my dog at the end of Seaport Blvd. This proposed development will seriously impact Bayshore/101 and the Woodside Road interchange. Currently, without Harbor View, the traffic at the interchange spills onto Bayshore/101 twice a day. Have you thought what the additional 4,000 plus employees impact will be on the region. Plus the development of the CVS area just across Bayshore/101 from this project will increase the traffic on the interchange.

As a resident of Redwood City for almost 50 years I have observed the city allow the over development of the greater downtown area with no apparent concern for reasonable housing. For example teachers of the Redwood City School district cannot afford to live in our city, low income persons and families struggle to find housing in RWC, small businesses are moving out because of increased rents. Where are the persons who will work at Harbor View or the CVS development live? The council has a responsibility to think about all our citizens and persons who work in our city.

The Harbor View Project is not a good fit for Redwood City. Please do not allow it to go forward.

Thank you,  
MaryAnn Clifford  
1103 Connecticut Drive  
Redwood City

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**Letter 36**      **MaryAnn Clifford**  
**Response**      February 7, 2019

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36-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Joe Cocoa](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View site  
**Date:** Saturday, February 09, 2019 2:40:14 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill salt ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Mark Kokoletsos  
Redwood City

Sent from [Outlook](#)

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**Letter 37**      **Joe Cocoa**  
**Response**      February 9, 2019

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37-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Patti Colevas](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Sunday, February 10, 2019 11:50:57 AM

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Dear Council,

I oppose the Harbor View project and I urge you to do so also.

This massive office project is not appropriate for the site north of 101 and Woodside Road. The number of employees expected at the proposed offices will substantially increase traffic congestion, auto emissions and exacerbate the affordable housing crisis.

In addition this is an area which is likely to be affected by rising sea level.

Please oppose the change in the general plan needed to approve this project.

Sincerely,

Patti Allen Colevas, MD

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**Letter 38**      **Patti Colevas**  
**Response**      February 10, 2019

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38-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Courtney Courtney](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Thursday, February 7, 2019 4:03:17 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.  
Courtney Courtney  
Redwood City

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**Letter 39**      **Courtney**  
**Response**      February 7, 2019

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39-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Heather Cowans](#)  
**To:** [GRP-City Council](#)  
**Subject:** Opposition to Harbor View Project  
**Date:** Sunday, February 10, 2019 8:54:33 AM

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City Council members,

Please do not continue forward with the review process for the Harbor View project.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you,  
Heather Cowans  
Redwood City Resident 13 years

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**Letter 40**      **Heather Cowans**  
**Response**      February 10, 2019

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40-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [David Crabbe](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Thursday, February 07, 2019 11:02:26 AM

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February 7, 2019

Mayor Bain and members of the Redwood City Council:

Re: Harbor View Development

Do not rezone the bay wetlands for the Harbor View project.

This development with 4,500 employees and no housing will only exacerbate the current jobs / housing imbalance in the county and massively increase traffic congestion on Hwy. 101.

New commercial development needs to be near transit as you have encouraged in your downtown plan, not in a potential flood plain due to sea level rise and isolated from the rest of the city by Hwy 101.

The bay wetlands should be left open for future sea level rise mitigation, not for commercial or housing development.

To allow this development will not only have a negative impact on Redwood City, but on every other community on the Peninsula. It's time to stop approving massive commercial growth without also considering where the new employees will live and how they will commute to and from work. To do otherwise is irresponsible planning.

Yours Truly:

David Crabbe

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**Letter 41**      **David Crabbe**  
**Response**      February 7, 2019

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41-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [judy.cronin](mailto:judy.cronin)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project.  
**Date:** Thursday, February 7, 2019 1:31:10 PM

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To RWC Council Members,

I'm concerned about the Harbor View Project.

This has been rejected by the Planning Commission

Our General Plan should NOT be ammended to help one developer.

I'm worried about the negative impact it will have on housing, traffic and air pollution.

Thank you for listening,  
Judy Cronin

Sent from my T-Mobile 4G LTE Device

**Letter 42**      **Judy Cronin**  
**Response**      February 7, 2019

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- 42-1              This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. See Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

From: [Carol Cross](#)  
To: [GRP-City Council](#)  
Cc: [Fossil Free Midpeninsula](#)  
Subject: The Harbor View project: What a horrible idea!!  
Date: Thursday, February 07, 2019 12:36:41 PM

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You do realize that even as you're contemplating the Harbor View project, Dave Pine, Kevin Mullin, and Don Horsley are taking steps to form a brand new government agency to manage flooding, sea level rise, coastal erosion and storm-water infrastructure in SMCo, yes?

To commit to putting up four 7-story office towers for 4,500 employees on the former Malibu Grand Prix and Lyngso site runs completely counter to what we already know and what the new agency will tell us: Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone, period!

Even without the concerns re: increased traffic, exacerbation of the housing shortage, and pressure created for more and more bay-front development ~ all valid concerns in and of themselves ~ the mere thought of a massive new development on what will become flooded on a regular basis runs counter to common sense.

Please reject the proposal.

Thank you,  
Carol Cross,  
Co-Convenor, Fossil Free Mid-Peninsula.

*Re: climate change: Building a world that works for everyone is exactly what we should refocus our efforts on doing when we read scientific studies that scare the hell out of us. As the researchers point out, there's still time that we have to take advantage of. **That's why it's so damn important to act boldly. Now.** ~ Eric Holthaus*

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**Letter 43**      **Carol Cross**  
**Response**      February 7, 2019

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43-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.

**From:** [DONNA CZARNECKI](#)  
**To:** [Council-Ian Bain](#)  
**Cc:** [Council-Diane Howard](#); [GRP-City Council](#)  
**Subject:** Retail needed at Harbor View  
**Date:** Saturday, February 09, 2019 8:26:07 AM

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To: Mayor Bain, Vice Mayor Howard and all City Council members,  
If you are still adding Retail to Redwood city, I would like to see either in the Downtown or in the new Harbor View plan to include these money makers: Marugame Udon restaurant...line is out the door everyday at Stonestown Galleria and Dave & Buster's is also a big hit at Serramonte. Providing those Harbor View employees over on their side of Highway 101 with very desirable food for lunch meetings out of their offices but within a walking distance, as well as, entertainment will help keep cars parked. Starbucks too.

I would also hope you take a look at ending the use of ERAF money for paying off Docketown lawsuits or any other City expenses and pass it on to the Elementary School District which is in serious financial trouble trying to meet residents demands for keeping popular programs and their necessary teachers. Help stabilize your Redwood City School District.

Thank you.  
Donna Czarnecki  
650-364-0815h

**Letter 44**      **Donna Czarnecki**  
**Response**      February 9, 2019

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- 44-1              This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Mali Dahl](#)  
**To:** [GRP-City Council](#)  
**Subject:** Public Comment about Harbor View project  
**Date:** Thursday, February 07, 2019 9:44:58 AM

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Hi,

I have worked in Redwood City since 1986 and am horrified at the prospect of this monstrously sized project in such an area. Has someone lost their minds? The access in and out of RWC has been terrible ever since Redwood Shores was developed, even before Oracle was fully built. Nothing has improved the infrastructure in terms of access and traffic since then.

The thought of putting that many people on that side of 101 on what is still, essentially, landfill is just asking for trouble. What happens to the quality of life? How can public services be maintained? What about the wetlands? What about the bay itself? This could be an ecological disaster, let alone thinking about rising sea levels thanks to climate change. And don't get me started on seismic activity. I worked in Redwood Shores in 1989 and was stuck behind the railroad crossing guards for over two hours after the Loma Prieta quake hit. (This was before the train tracks were moved at the Belmont crossing.

This is a zoning request that has no real thought, other than, as I speculate, pure greed, behind it. The Climate Test by Government Test city needs to put the kibosh on this and turn away from a project that will be a black mark on this city (if it goes forward) for years to come. God help us!

The impact on the Bay Area traffic (101 and 280 and surface streets) would be just a nightmare and I do not look forward this in the least.

Respectfully, Mali Dahl

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**Letter 45**      **Mali Dahl**  
**Response**      February 7, 2019

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45-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

To the extent this comment addresses biological resources, land use, and traffic impacts, refer to Section 4.3, *Biological Resources*, Section 4.9, *Land Use and Planning* and Section 4.14, *Transportation and Traffic* of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 2 in Chapter 5, which addresses sea level rise.

**From:** Janet Davis [<mailto:jadjad@sbglobal.net>]  
**Sent:** Wednesday, January 16, 2019 1:57 PM  
**To:** CD-Steven Turner <[sturner@redwoodcity.org](mailto:sturner@redwoodcity.org)>  
**Subject:** Objection to the Harbor view Project

This contemplated project is ill conceived. In addition to the problems of sea level rise, sewers, water, and traffic, it is going to add thousands of employees to a totally inadequate supply of housing that will have a deleterious impact especially on North Fair Oaks.

**Letter 46**      **Janet Davis**  
**Response**     January 16, 2019

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- 46-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** Keith DeBrine <[keith@SKYLINEPARTNERSCM.COM](mailto:keith@SKYLINEPARTNERSCM.COM)>  
**Subject:** Harbor View Project  
**Date:** February 8, 2019 at 5:48:46 AM PST  
**To:** "[council@redwoodcity.org](mailto:council@redwoodcity.org)" <[council@redwoodcity.org](mailto:council@redwoodcity.org)>

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Keith DeBrine  
Redwood City Native

Keith DeBrine  
**Skyline Partners, Inc.**  
570 El Camino Real, Suite # 150-406  
Redwood City, CA 94063

Office 650-367-9657  
Cell 650-400-6441  
[www.skylinepartnerscm.com](http://www.skylinepartnerscm.com)

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**Letter 47**      **Keith DeBrine**  
**Response**      February 8, 2019

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47-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [jdquarterhorses](#)  
**To:** [GRP-City Council](#)  
**Subject:** Re: Harbor View Project  
**Date:** Sunday, February 10, 2019 12:15:31 PM

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Dear Mayor Bain and City Council members,

**Help Save Our Precious Local Baylands.**

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill Sal Ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

John Delgado  
San Martin, California

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**Letter 48**      **John Delgado**  
**Response**      February 10, 2019

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48-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Gita Dev](#)  
**To:** [GRP-City Council](#); [CD-Steven Turner](#); [MGR-Aaron Aknin](#)  
**Cc:** [James Eggers](#); [Sierra Club Chair Trans Gladwyn d'Souza](#)  
**Subject:** Sierra Club comments for Harbor View Study Session Feb 11, 2019  
**Date:** Friday, February 08, 2019 11:52:59 AM  
**Attachments:** [Sierra Club- Harbor View comments 2-11-19.pdf](#)

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Dear Mayor Bain and Redwood City Council Members

- The Sierra Club has had an opportunity for a preliminary review of the draft environmental impact report (DEIR) on the Harbor View project.
- We offer the following early observations in the hope that they may be timely for the study session this coming Monday February 11, 2019.

Please find our attached brief letter on this subject.

Respectfully submitted,

*Gita Dev, FAIA*  
*Sierra Club Loma Prieta*  
*Sustainable Land Use Committee*  
*415-722-3355*

**Letter 49**      **Gita Dev**  
**Response**     February 8, 2019

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49-1              This comment refers to a letter that was submitted by the Sierra Club's Loma Prieta chapter. Please refer to the responses to Letter 16, earlier in this chapter.

**From:** [Loretta Dipboye](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Projecty  
**Date:** Saturday, February 09, 2019 1:08:27 PM

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Dear City Council Members,

I am writing to express my serious concerns with the proposed development at Harbor View which calls for over 1 million square feet of office space, 4,500 employees and 3,500 parking places. (So maybe 1,000 of the employees will be carpooling, biking or walking to work?)

This is a huge project which will negatively impact the quality of life in a significant way by increasing (already bad) traffic and creating more demand for housing. These demands in turn will cause increased air pollution at a time when we are all supposed to be decreasing the use of fossil fuels, as well as the need for more water, which we do not have. As an example of just current traffic problems, a few weeks ago my boyfriend and I were driving south on 101 on the way to San Carlos and there was a huge line of cars, almost stopped, waiting to get off the freeway at an exit--about 2-3 blocks in length ON THE FREEWAY--and it was not even rush hour. It was a weekend afternoon. So, if you are going to pretend that all these new people will not be using cars, you are mistaken.

Furthermore, in the letter sent to you from the Sierra Club, they point out some significant flaws in the Draft EIR which could underestimate the traffic impacts and housing demand by a very large margin.

This site is much better suited for light industrial development, which would diversify job opportunities for local citizens and cause much less traffic and congestion. For these reasons, I urge you to reject a General Plan Amendment to allow Harbor View, and only consider projects that conform to the existing General Plan and Zoning regulations. The current plan was carefully thought out to support in-fill development along transit corridors, allow for some new office space in the downtown area and maintain a decent quality of life for the people who live here.

Thank you for your consideration of my remarks.

Respectfully,  
Loretta Dipboye  
(member, Redwood City Neighbors United)  
[lldipboye@yahoo.com](mailto:lldipboye@yahoo.com)

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**Letter 50**      **Loretta Dipboye**  
**Response**      February 9, 2019

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50-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on air quality, land use and traffic, refer to each Section 4.4, *Air Quality*, Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance. No additional analysis or response is required.

**From:** [Kkayvt](#)  
**To:** [GRP-City Council](#)  
**Subject:** Save the baylands  
**Date:** Thursday, February 07, 2019 8:51:09 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Save our environment, there is so little left to save!

Thank you for your consideration.

Kathleen Djordjevich

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**Letter 51**      **Kathleen Djordjevich**  
**Response**      February 7, 2019

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51-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** Joan Donovan <[donvanbj@gmail.com](mailto:donvanbj@gmail.com)>

**Subject:** Harbor View Project

**Date:** February 7, 2019 at 9:25:18 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and City Council Members,

Please do not move forward with the review process for the Harbor View Project.

Changing the zoning of this area, for a commercial office project can result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will make traffic congestion on Highway 101 worse, particularly at the Woodside Road interchange. Most important the Harbor View site is in the path of sea level rise!! Redwood City should **not** be approving further development in the **flood zone**.

A huge new commercial office, with 4,500 employees can also add to our housing woes as will as traffic concerns.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Joan Donovan  
San Mateo

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**Letter 52**      **Joan Donovan**  
**Response**      February 7, 2019

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52-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Lisane Drouin](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project (against) - City Council study session  
**Date:** Thursday, February 07, 2019 9:10:18 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

My husband and I have lived, worked, patronized local businesses, and participated in social and cultural events in and around Redwood City for over 18 years. Our son will attend Sequoia High School this fall. We are well familiar with the area being considered for the short sighted Harbor View project. We use to enjoy family time and friends at Malibu Grand Prix and were quite saddened of its closing. When the weather allows, my husband Patrick bikes to his office on East Bayshore, otherwise he must use his car to commute which usually takes him twenty minutes despite our home being five minutes away. There is not public transit available.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill salt ponds, a project that has divided the Redwood City Community.

With so much at stake, will Redwood City uphold its General Plan and reject the Harbor View proposal, or will we be approving a project that may pave more of the already shrunken Bay? Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Lisane Drouin,  
167 F Street, Redwood City, CA 94063  
[l.drouin@live.com](mailto:l.drouin@live.com)

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**Letter 53**      **Lisane Drouin**  
**Response**      February 7, 2019

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53-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Gladwyn D'Souza](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Thursday, February 7, 2019 2:47:56 PM

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Re: Harbor View Development

Do not rezone the bay wetlands for the Harbor View project.

This development with 4,500 employees and no housing will only exacerbate the current jobs / housing imbalance in the county and massively increase traffic congestion on Hwy. 101.

New commercial development needs to be near transit as you have encouraged in your downtown plan, not in a potential flood plain due to sea level rise and isolated from the rest of the city by Hwy 101.

The bay wetlands should be left open for future sea level rise mitigation, not for commercial or housing development.

To allow this development will not only have a negative impact on Redwood City, but on every other community on the Peninsula. It's time to stop approving massive commercial growth without also considering where the new employees will live and how they will commute to and from work. To do otherwise is irresponsible planning.

Yours Truly:

Gladwyn d'Souza  
Belmont

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**Letter 54**      **Gladwyn D'Souza**  
**Response**      February 7, 2019

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54-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Kenneth Dulaney](#)  
**To:** [GRP-City Council](#)  
**Subject:** We are bombarded with anti harbor project emails  
**Date:** Friday, February 08, 2019 10:21:38 AM

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They are pushing us to convince you the project is wrong. I don't know if its wrong for Redwood City. That is your job. Please do not bow to political outside and look at the project for its merits or non-merits.

Ken

[[+]]

name: Ken Dulaney

title: Aragon Fellow

mobile: 650-483-5444

phone: 888-650-2586

email: [ken@aragonresearch.com](mailto:ken@aragonresearch.com)

[[+]]

**Letter 55**      **Ken Dulaney**  
**Response**      February 8, 2019

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- 55-1              See Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Elizabeth Duncan](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Thursday, February 07, 2019 8:20:53 AM

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Please do not approve this. Employees would not have affordable places to live, and it would contribute to spoiling this lovely wild area that we hike in. Elizabeth Duncan

**Letter 56**      **Elizabeth Duncan**  
**Response**      February 7, 2019

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56-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the housing see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Contact-Kaia Eakin](#)  
**To:** [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#); [Council-Shelly Masur](#); [Council-Giselle Hale](#); [Council-Diana Reddy](#)  
**Cc:** [MGR-Melissa Stevenson Diaz](#); [CLK-Pamela Aguilar](#); [MGR-Aaron Akin](#); [BCC-Kevin Bondonno](#); [BCC-Ernie Schmidt](#); [BCC-Nancy Radcliffe](#); [BCC-Michael Smith](#); [CD-Steven Turner](#); [BCC-Rick Hunter](#); [BCC-Bill Shoe](#); [Contact-Kaia Eakin](#)  
**Subject:** RE: 7C Public Hearing to receive comments on Draft EIR Harbor View  
**Date:** Friday, February 08, 2019 3:07:00 PM

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Honorable Mayor Bain and Members of the City Council,

Thank you for your tireless work to represent all the citizens of Redwood City. I appreciate your service.

I am writing today regarding the Study Session on Monday, February 11 on the Harbor View Project. I do not support moving forward with the process of amending the general plan to accommodate this massive project.

I have reviewed the Draft Environmental Impact Report on the City's web site and I am startled by how many of the impacts described are unable to be mitigated. The location and size of this project will create traffic congestion on an entirely new level. The impact will be felt along east-west thoroughfares in residential neighborhoods as drivers seek to escape to 280 because 101 will be at a stand-still.

Our fragile jobs/housing imbalance will be thrown further off kilter. Currently our neighbors are experiencing terrible challenges affording their rented apartments. Young families are challenged to buy homes here.

In the 75-page report on *Air Quality and Energy Detail (Appendix C)* the word "unmitigated" appears again, and again, and again.

At some point, our community needs to ask about quality of life considerations. Do we need a project that is so massive that it will impact our traffic, our home affordability, our air quality, our water usage, our energy usage, our port, and our longstanding industries alongside the port, to name just a few?

The question of whether to allow a Draft Environmental Impact Report came before the Planning Commission over a year ago. Then Chair Nancy Radcliffe noted that the Inner Harbor Area (which includes

Harbor View) had been studied at great length when the community approved its general plan in October, 2010. She noted that during that process, there was extensive community outreach and discussion of community visioning for the area. Commissioner Radcliffe suggested the area had already been fully studied and the community had already rendered its opinion on the area. Her colleagues agreed and voted to deny Harbor View's request to study a Draft EIR at that time.

I respectfully request that you follow your Planning Commission's recommendation and the recommendation of your community members when they voted to approve the General Plan.

Further study at this juncture, particularly with the clear indication that there will be many, many unmitigated adverse impacts to the entire community, is not in the best interests of the residents of Redwood City.

The additional adverse impact that goes unmentioned is the way it is sapping city resources that could be put to better use on projects without adverse impacts, without controversy. Every day that we continue to study this proposal is another day that city staff are side-lined from working on other projects that comply with the General Plan.

Best practices in urban planning allow for the community to envision the desired contours of their city and then allow developers to submit proposals that manifest that vision. If Redwood City continues to allow a developer with deep pockets who promises local non-profit organizations millions of dollars to subvert the general plan process, then it ceases to be a leader in community engagement.

Thank you for reading this letter and considering the points reflected. I appreciate your careful deliberative process.

Respectfully submitted,

Kaia Eakin  
Redwood City Resident

**Letter 57**      **Kaia Eakin**  
**Response**      February 8, 2019

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57-1              With respect to the comment on air quality and traffic impacts, refer to Section 4.4, *Air Quality* and Section 4.14, *Transportation and Traffic* of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the project's employment density, see Master Response 1, also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Karin Eckelmeyer](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Thursday, February 07, 2019 10:33:57 AM

---

Sirs:

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Karin Eckelmeyer  
Portola Valley, CA

**Letter 58**      **Karin Eckelmeyer**  
**Response**      February 7, 2019

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58-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Howard Eisenberg](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Thursday, February 7, 2019 2:18:41 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

**Howard Eisenberg**  
**810 Wilmington Rd.**  
**San Mateo**

**Letter 59**      **Howard Eisenberg**  
**Response**      February 7, 2019

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59-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Contact-Veronica Escamez](#)  
**To:** [GRP-City Council](#)  
**Cc:** [Contact-Tammie Barbero](#); [Contact-Connie Guerrero](#)  
**Subject:** Support of Harbor View Project  
**Date:** Friday, February 08, 2019 4:21:06 PM

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Dear Mayor and Council members,

As you know, our grassroots, non-profit organization serves youth and adults in our community and celebrates Latino culture and heritage through programming in arts, dance, theater music, scholarships and more. This includes our flagship event Dia de Los Muertos here in Redwood City. Since 2009 we have worked to enriched the lives of some of the most vulnerable in our community. This is why Casa Circulo Cultural supports the proposed Harbor View campus in our city. The developer, Jay Paul, has proven time and again to be a dedicated community partner. This is not required and yet they step up on behalf of organizations like ours without hesitation. More importantly, however, the long term funds this project will generate for the city must not be ignored. This includes long overdue improvements to roads and Woodside Road/101, access to bay lands, a new public park, increased revenue to struggling small businesses, funds for our schools and services and \$12 million for affordable housing units here in Redwood City.

These are the concerns many members of Casa Circulo's community care about and it is why our organization supports the Jay Paul Harbor View project as it is proposed.

As elected officials responsible for ensuring that our city and all of its residents thrive, we hope you will consider the many positive economic impacts this project will offer our community for years to come.

Thank you

**Verónica Escámez**

Founder

**Casa Círculo Cultural**

1757 East Bayshore Rd. Suite 23

Redwood City, CA 94063

650 346-8468

[www.circulocultural.org](http://www.circulocultural.org)



**Letter 60**      **Veronica Escamez**  
**Response**      February 8, 2019

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- 60-1              See Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Luci Evanston](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please conserve local baylands  
**Date:** Thursday, February 07, 2019 9:24:04 AM

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Hello, I would like to weigh in against the Harbor View project for environmental reasons.

Thank you

Luci Evanston

Sent from [Mail](#) for Windows 10

**Letter 61**      **Luci Evanston**  
**Response**      February 7, 2019

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61-1              See Master Response 4 in Chapter 5 of this Final EIR. This comment does not present information on specific environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** Pauline Facciano <[pfacciano@yahoo.com](mailto:pfacciano@yahoo.com)>  
**Subject:** Save our Bayfront in Redwood City  
**Date:** February 7, 2019 at 8:52:12 PM PST  
**To:** <[council@redwoodcity.org](mailto:council@redwoodcity.org)>  
**Reply-To:** Pauline Facciano <[pfacciano@yahoo.com](mailto:pfacciano@yahoo.com)>

NO WAY to four 7-story office towers at the Bayfront in Redwood City.

Maybe 3-4 stories.

BE REASONABLE.

The traffic is already so much more than I ever dreamed.

Sincerely,

Pauline Facciano

**Letter 62**      **Pauline Facciano**  
**Response**      February 7, 2019

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- 62-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Kyla Farrell](#)  
**To:** [GRP-City Council](#)  
**Subject:** NO on the Harbor View project  
**Date:** Thursday, February 07, 2019 11:51:35 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

My primary concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

I would be in full support of a development that included housing for 4,500 people, however, the peninsula and Redwood City DO NOT NEED MORE OFFICES. There are plenty of jobs in the area. Our city needs to focus on creating sustainable housing and transit solutions, not adding more workers.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Kyla Farrell

Redwood City Resident

**Letter 63**      **Kyla Farrell**  
**Response**      February 7, 2019

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63-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to the project's jobs/housing balance, see Master Response 1, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Blondie](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Saturday, February 09, 2019 2:07:48 PM

---

Dear Council Members,

I'm sending this to ask you NOT to advance the Harbor View Project at this time. Also, I would ask that you not change the zoning/land use in this area of the City especially for the Jay Paul project.

Thank you for your time and consideration,

Regards,

Patricia Ferrando

64 Fulton St.

RWC



**Letter 64**      **Patricia Ferrando**  
**Response**      February 9, 2019

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- 64-1              See Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Leslie Flint](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Proposal - Study Session February 11, 2019 - comments  
**Date:** Saturday, February 09, 2019 10:42:41 AM  
**Attachments:** [letter to RC re Harbor View.doc](#)

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Attached please find a letter from Sequoia Audubon Society with comments regarding the Harbor View Proposal - Study Session Feb. 11, 2019

65-1

Leslie Flint  
Conservation Committee  
Sequoia Audubon Society

**Letter 65**      **Leslie Flint**  
**Response**      February 9, 2019

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65-1              This comment refers to a letter that was submitted by the Sequoia Audubon Society. Please refer to the responses to Letter 13, earlier in this chapter.

**From:** [Patricia Fuenzalida](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Friday, February 08, 2019 9:11:21 AM

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Hello,

I write with great concern regarding the proposed commercial development, The Harbor View Project. We all must share in the responsibility of making the best choices for our community and the overall quality of life in the amazing Bay Area. This project creates far more problems than benefits and I am hoping that short term greed does not sway your decision in this matter.

Traffic congestion is a huge issue already and this only adds to the problem. There also is simply not enough housing for all the new offices being created. And we would be truly shortsighted to ignore the tragic mistake of overdeveloping our Bay Front knowing we face rising sea levels. Finally, one of our most treasured landmarks is our beautiful Bay... which many cities are overbuilding on ... heartbreaking.

Please consider what kind of future your decision will be shaping.

Thank-you,

Patricia Fuenzalida

**Letter 66**      **Patricia Fuenzalida**  
**Response**      February 8, 2019

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66-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Daniela Gasparini](#)  
**To:** [Council-Ian Bain](#); [Diane Howard](#); [Council-Shelly Masur](#); [Council-Janet Borgens](#); [Council-Diana Reddy](#); [aaguire@redwoodcity.org](mailto:aaguire@redwoodcity.org); [Council-Giselle Hale](#)  
**Cc:** [MGR-Melissa Stevenson Diaz](#); [CD-Steven Turner](#); [MGR-Aaron Akin](#)  
**Subject:** DEIR Harbor View  
**Date:** Monday, February 11, 2019 3:05:14 PM

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Rather than add three minutes to your public comment tonight I thought I would simply submit my comments for the record! I'm sure it will be a late night for everyone already.

I had one question and perhaps staff will cover this in the summary of the findings. I know the project was studied at various densities? Was a "no development" studied? If the property owner chose to not build not even what is allowed within the current zoning and we studied proposed or projected commercial (office) growth in SF, SC and SJ Counties what happens to our community. In other words what happens to 101, 280, jobs housing imbalance to Redwood City and there was NO development on that site? No option for mitigations to help current transportation congestion, housing imbalance, schools etc.

Would we not have all the impacts North and South of us (congestions and lack of housing) and no opportunity for mitigation or improvements in Redwood City?

I have appreciated our past councils and how hard they have fought for community benefit far beyond our normal fees i.e. housing impact fees, school fees, park fees, public art fees...past councils have worked very close with property owners to understand their responsibility goes beyond what our fee schedule is...and I believe projects are better for it, our community is better for it.

We know what the Draft EIR says as far as impacts and what is mitigable and what would not be. It is my hope you will think like past councils and understand the community benefit if we do allow for a zoning change and or higher density. With a project like this we can finally complete Blomquist extension, we can envision a future for the Woodside road interchange project, we can really build affordable housing and not just put money into a fund that can't be used, we can build community partners and deliver affordable housing AND the services necessary to support our families.

I read a post this weekend written by a community member that simply made me angry. This person tried to minimize the decades of public service of Jeff Gee and John Seybert to simply stating they were "developer cheerleaders". These people continue to try and put you in a development or no development bucket. I know you all know this to be different and can appreciate the complexity of development, supporting the economy so that we can deliver safer roads, better roads, more housing, better parks, more parks and create a quality of life we are all proud of. Projects like Harbor View can get us there. Tonight, I hope we will all adhere to project facts and the elements of the draft EIR.

Thanks for your leadership. I understand the crossroads you face and hope that once we are through the comment phase of the EIR we can get to the real conversations about what this project could bring to our community far beyond the development itself.

I will be in the audience tonight but again hoping my comments might be entered into the record without having to lengthen your meeting by another 3 minutes tonight.

BTW- while this comment is not within any response to the draft EIR, I also disagree with a few of our community members who might say community involvement shouldn't be a consideration for a project. You bet it should. We have worked hard to develop a culture of community and have spent much time raising the land owner and developer bars in understanding they must be a part of this community, contribute to the fabric of this community, be a part of our non-profits, employees should be involved, their corporate culture should match our culture of philanthropy and community. So yes, we should continue to expect folks who come into Redwood City, give back to Redwood City. And I believe we have achieved that. We all can look at projects, developments and companies that contribute well beyond an ordinance or zoning mandate. That is something I thank you as council members, our chamber, our school boards and schools and our community members for valuing the relationship vs. the transaction!

Good Luck tonight...More to come I am sure.

Dani Gasparini  
GB Consulting

842 Edgewood Rd.  
Redwood City, CA 94062

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3975 West Dry Creek Rd.  
Healdsburg, CA 95448

m: 650.296.6959

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**Letter 67**      **Daniela Gasparini**  
**Response**      February 11, 2019

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67-1      With respect to the comment on alternatives, specifically the No Project Alternative, which was analyzed, refer to Chapter 5, *Alternatives*, of the Draft EIR, as well as Chapter 3 of this Final EIR which provides the analysis related to an additional No Project alternative.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Alec Gellrich](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Comment on Harbor View Project  
**Date:** Friday, February 08, 2019 6:19:36 PM

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Dear City Council Members,

The Harbor View Project should not continue. The environmental impacts are too severe. Since it is cut off from downtown Redwood City, the people that would work there would not come visit our shops and join our community. As a Redwood City lifelong resident, I do not see how the benefits of this project outweigh the disadvantages.

Thank you for listening to my voice,

Alec Gellrich

**Letter 68**      **Alec Gellrich**  
**Response**      February 8, 2019

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- 68-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Contact James Gernand](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Proposal - Study Session Feb 11, 2019  
**Date:** Sunday, February 10, 2019 9:07:18 PM  
**Attachments:** [2.10.17 CITY INTRODUCES LEGISLATION TO ADVANCE PROTECTIONS FOR INDUSTRIAL BUSINESSES.pdf](#)

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Dear Mayor Bain and Council Members,

I am a resident of Redwood City and I actively participated in the General Plan Update process and the Downtown Precise Plan process. I appreciated that both of these efforts were done with the broad public input that provided clear direction regarding the types of growth and locations for growth our community desires.

The General Plan Update process made clear that our community desires a robust and mixed economy, and a mixed economy includes light-industrial uses. The kinds of jobs provided by the Port of Redwood city and its supporting industries are a key part of the effort to broaden Redwood City's economic base and provide economic resiliency. Providing jobs for all skill and education levels is an essential component in addressing our housing affordability crisis. Light industrial businesses provide well paying jobs that do not require a four-year degree. It is exactly these kinds of jobs that are necessary to create a shared prosperity economy.

It is a fact light industrial business are under enormous pressure in the Bay Area, in part due to displacement and conversion of light industrial districts into new office and housing projects such as this one proposed by the Jay Paul Company. Other bay area cities, such as San Francisco, have identified the protection of industrial-zoned districts is such an important issue, they have recently introduced legislation specifically designed to enhance zoning protections for industrial business. See link and the attachment to this email for information regarding the San Francisco findings regarding this problem.

<http://oewd.org/sites/default/files/News/Press%20Release/2.10.17%20CITY%20INTRODUCES%20LEGISLATION%20TO%20ADVANCE%20PROTECTIONS%20FOR%20INDUSTRIAL%20BUSINESSES.pdf>

The Redwood City General Plan established policies and programs expressly intended to preserve and expand the Port of Redwood City and its supporting business and at the same time to focus the development of new office spaces in the downtown so they will be close to housing and public transit. The Jay Paul Company purchased the site as currently zoned with the intent to develop the site in direct contradiction to the City's General Plan. This is not an "as of right" issue, this is a zoning-busting project proposed for a site that is identified in the General Plan as an ideal location for industrial uses. Changing the General Plan and zoning within our current light industrial corridor will almost certainly generate further land speculation in similar light industrial areas, eroding the availability of light industrial land in Redwood City is a negative impact to the long term economic resilience that is provided by a mixed economy.

There is no compelling reason why the City should be investing time and resources pursuing a non-conforming developer proposal when there already is a significant amount of similar development proposals in the pipeline that conform to current zoning and do not require general plan amendments. I urge the City Council to exercise its right to decide now if this project should even be considered and deny the request by Jay Paul Company to allow the General Plan Amendment process to go forward.

Regards,

Jim Gernand

Redwood City Resident

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**Letter 69**      **James Gernand**  
**Response**      February 10, 2019

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69-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and zoning, refer to Section 4.9 *Land Use and Planning* of the Draft EIR, which provide the analysis related to the environmental impact topic.

**From:** [Diana Hall](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Friday, February 08, 2019 9:53:08 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Diana Hall  
Mountain View

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**Letter 70**      **Diana Hall**  
**Response**      February 8, 2019

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- 70-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Trish Hallenbeck](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor view project  
**Date:** Thursday, February 07, 2019 12:56:11 PM

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Dear Council Members,

As a resident of Redwood City, and with my home several blocks off of Woodside Road, I am writing to strongly object to the rezoning of the harbor land and the possibility of adding new high-rise office structures. I strongly object on many counts. This would be a horrible misuse of this land.

Please add me to the email list to receive any updates about this issue.

Sincerely,

Patricia Hallenbeck  
370 Alexander Avenue  
Redwood City, CA 94061

**Letter 71**      **Trish Hallenbeck**  
**Response**      February 7, 2019

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- 71-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Cynthia Hanson](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 11:27:50 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Cynthia Hanson  
Mountain View 94043

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**Letter 72**      **Cynthia Hanson**  
**Response**      February 8, 2019

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72-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Further, the commenter notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR.

With respect to the comment on floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Linda Hayward](#)  
**To:** [GRP-City Council](#)  
**Subject:** OPPOSITION TO HARBOR VIEW PLACE  
**Date:** Wednesday, February 06, 2019 11:27:49 AM

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PLEASE ... PLEASE ... PLEASE ... listen to the residents of Redwood City.

We are **over-built, over-populated and over-congested**. Our air quality already sucks because of traffic, and you are presenting this photo as if the traffic was from the 60's!

Wake up! That is NOT realistic in any way!!!

This is realistic!



Stop the pressure !!! It seems nobody is listening to any of us.

You have over-built our city to the max.  
You've made it impossible to park downtown.  
Can't drive down El Camino due to more BUILDING, more congestion.  
Can't drive down Woodside Road due to 101 TRAFFIC.  
STOP and GO traffic on 101 daily.  
And you keep building and building and building and building !

How many more ways to the citizens of this city/county have to ask you to STOP! We keep telling you we DON'T want to live like this!

We are now using all of the residential streets to cut across town to try maneuver 2 and 3 exits away to beat traffic at 84 and 101. Residents didn't buy homes in this city to have their residential streets a thoroughfare!

We simply can't take on this massive project that produces AT LEAST 6,000 more cars, as well as taking away our beautiful wetlands. **WHAT ARE YOU THINKING!**  
**NO NO NO NO NO .....**

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**Letter 73**      **Linda Hayward**  
**Response**      February 6, 2019

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73-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to traffic, refer to Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic.

**From:** [Diane Heditsian](#)  
**To:** [GRP-City Council](#)  
**Subject:** One Citizen's Voice  
**Date:** Friday, February 08, 2019 6:03:13 PM

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Dear Council,

I will be out of town on business when the Harbor View project will be discussed at a public hearing on Feb. 11. I would like to go on record as being against the project for Redwood City based on the impact of the recently released Draft Environmental Impact Report, many of the elements of which cannot be mitigated. The existing land use and zoning should not be changed for this project. Also the traffic impact from this project cannot be mitigated, even with an updated 101/84 interchange. Everyone wants to see a thriving Redwood City, but at what cost? Please consider.

Sincerely,  
Diane Heditsian

**Diane Heditsian**  
**Chief Executive and Creative Officer**  
**deClarity**  
**Brings the Life Sciences to Life**  
[www.declarity.com](http://www.declarity.com)

650 361-8061 office  
650 888-1970 cell

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**Letter 74**      **Diane Heditsian**  
**Response**      February 8, 2019

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74-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment regarding traffic, refer to Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic.

**From:** [Rita Hester](#)  
**To:** [GRP-City Council](#)  
**Subject:** Letter against the Harbor View Project  
**Date:** Friday, February 08, 2019 3:00:06 PM

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Dear Mayor Bain and City Council members,

The following letter is one that has been written by my friends. I have Parkinsons and it is very hard for me to write on the compiter. But do not be mistaken. I am a firm believers in ALL the points made in this letter  
Rita Hester

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the *path of sea level rise*. *Redwood City should not be approving further development in the flood zone with no plan for how to protect it.*

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Rita Hester

Palo Alto

**Three things in human life are important: The first is to be kind. The second is to be kind. The third is to be kind.**

~Henry James (1843-1916)

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**Letter 75**      **Rita Hester**  
**Response**      February 8, 2019

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75-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



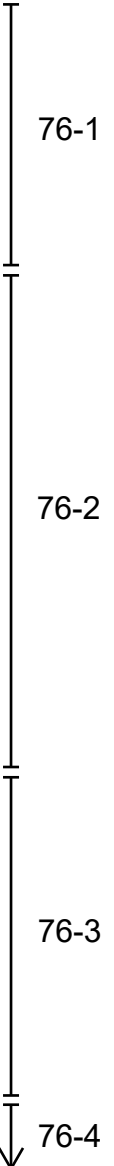
**From:** [Lisa Hicks-Dumanske](#)  
**To:** [GRP-City Council](#)  
**Subject:** comment on the Harbor View project draft EIR (DEIR)  
**Date:** Sunday, February 10, 2019 6:58:13 PM

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I live less than two miles from the proposed Harbor View site. I commute most days through the Woodside Road/Hwy 101 intersection. I therefore encourage the City Council to not move forward with this project (Harbor View) and to only consider projects that conform to existing land use and zoning codes. Please reconsider your prior decision and not move forward with a General Plan Amendment. Rather than move forward with this proposal, the Council should instead encourage the developer to return with a project that conforms to the existing General Plan and Zoning Code regulations for the site.

Below are some reasons why the General Plan should not be changed for Harbor View. Amending the General Plan for this project will:

1. **Bring thousands of more cars daily to an area that does not have the infrastructure to support the increase.** Traffic impacts will be significant and unavoidable according to the draft EIR; they will negatively impact the ability of businesses on Seaport Blvd. to efficiently transport goods and significantly lengthen commute times for thousands of Peninsula commuters. The draft EIR projects that the average vehicle miles traveled per day per employee will be 26 miles, indicating that many, if not most, employees will be living far from Harbor View and traveling to work by car.
2. **Exacerbate the City’s current housing shortage and housing affordability crisis by significantly driving up housing demand.** The draft EIR underestimates this effect by claiming that the City's capacity to build more than 3300 additional housing units will partially mitigate this effect. In fact, the available capacity estimate used in the DEIR is outdated, as more than 1000 units have been built or are under construction since that evaluation was made. Furthermore, the DEIR fails to consider that there is already more than 2.8 million square feet of office space approved, proposed, or under construction in Redwood City - all in areas approved for office development in the General Plan. These offices will more than use up available capacity, even if the Harbor View site remains vacant. The City cannot continue to approve large office-only development - in particular amending the General Plan to do so - otherwise, drastic land use changes in the future will be required to increase housing capacity within the city limits (such as developing existing parks or open space, such as the Cargill salt ponds).
3. **Erode the capacity for Redwood City to broaden its economic base via light-industrial activities.** The site is perfectly suited for industrial uses, being adjacent to the port, rail and freeway, and far from residences. Industrial activities provide economic diversity to the City which will help mitigate the negative effects of economic downturns. Furthermore, industrial operations provide well-paying, long term jobs for blue collar workers. Developer and trade association/union claims of the benefit to construction jobs for this project are short term only. Office construction can occur elsewhere in the City (with union labor) without the need to amend the General Plan.
4. **Potentially hinder the ability to preserve and expand the Port of Redwood City and its supporting industries.** A major goal of the



General Plan is to preserve and enhance Port operations, which is an asset critical to the regional economy. Upzoning the Harbor View site will raise land values and potentially encourage redevelopment of adjacent industrial facilities critical to Port operations. The current General Plan land use for the Port area resulted from an extensive community visioning process. If the City wishes to now encourage high density office development northeast of 101, it should do so as part of a new community visioning process that looks at all areas of the city likely to redevelop in the future - not do so in an ad hoc fashion via parcel-specific General Plan amendments.

↑  
76-4  
cont.

There is no intrinsic need for or benefit to a large office project north of 101, especially with recent and ongoing office construction. Overriding considerations to accept significant and unavoidable environmental impacts should be considered where broad scale economic benefit to the city as a whole is anticipated, or where a project fills a community-wide need. No clear benefits like those from the Downtown Precise Plan (e.g. significant downtown revitalization, high-density housing, restaurants and entertainment venues) can be anticipated for Harbor View. Instead, proposed project "benefits" consist largely of required impact fees, and contributions toward infrastructure projects that are already planned by the City (eg. Blomquist extension and 101/Woodside Road interchange improvements). Many of the "community benefits" are designed to primarily make the project more attractive to project tenants and allow the developer to maximize rents. Housing impact fees and proposed donations for construction of affordable housing will likely produce no more than a few dozen units - far less than the nearly 1000 units of affordable housing that would be necessary to accommodate the project's demands. Tax revenues from office construction can be acquired elsewhere without a General Plan amendment. In fact, a significant number of the proposed benefits could be reasonably expected from development of the site under the General Plan, as evidenced by other projects such as Broadway Plaza, which proposes significant benefits and site improvements while not requiring a General Plan Amendment.

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76-5

In summary, I encourage the City Council to not move forward with this project (Harbor View) and to only consider projects that conform to existing land use and zoning codes.

Lisa Hicks-Dumanske  
[dumanske@astound.net](mailto:dumanske@astound.net)

**Letter 76**      **Lisa Hicks-Dumanske**  
**Response**      February 10, 2019

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76-1              This comment restates the findings of the Draft EIR with respect to traffic impacts, and therefore does not present additional environmental issues that have not been addressed in the Draft EIR. No additional analysis or response is required.

76-2              See Master Response 3 in Chapter 5 of this Final EIR, relating to jobs and housing.

76-3              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use, refer to Section 4.9 *Land Use and Planning* of the Draft EIR, which provide the analysis related to that environmental impact topic.

76-4              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use, refer to Section 4.9 *Land Use and Planning* of the Draft EIR, which provide the analysis related to that environmental impact topic.

76-5              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Bill Hilton](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project--No  
**Date:** Thursday, February 07, 2019 8:51:47 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

The proposed project will worsen the jobs-housing imbalance, already a serious problem in the Bay Area.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

*Bill Hilton*  
*Sunnyvale*



**Letter 77**      **Bill Hilton**  
**Response**      February 7, 2019

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77-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Mary Lou Holding](#)  
**To:** [GRP-City Council](#)  
**Subject:** Do not approve Harbor View Project  
**Date:** Friday, February 08, 2019 9:27:34 AM

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Dear Council Members,

We need to solve the housing crisis in Redwood City *before* more office space is built in our city. An increase of 8090 daily car trips is unacceptable. The potential impact on the port, the only one left on the peninsula or in the South Bay is also unacceptable. Stop this project now!

Sincerely,  
Mary Lou Holding  
1015 Connecticut Drive  
Redwood City, CA 94061

**Letter 78**      **Mary Lou Holding**  
**Response**      February 8, 2019

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78-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance. No additional analysis or response is required.

**From:** [Rachel Holt](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Monday, February 11, 2019 9:24:50 AM

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Mayor Bain and Councilmembers,

Unfortunately I am unable to attend tonight's meeting due to other obligations. I am writing to voice my strong opposition to an amendment to the General Plan to allow for the Harbor View proposed development, or any other development like it.

The community has spoken loudly about requiring more of developers- both in terms of direct benefits to the community AND indirect by way of better quality construction, massing, and character. Now is your opportunity to show the community that you are listening.

The Harbor View project does not belong on the bay in Redwood City. Now that the developer, the Jay Paul Company, has completed their Environmental Impact Report (EIR) it could not be more clear that there are a substantial number of significant impacts which cannot be mitigated.

Fundamentally, this is the wrong project in the wrong place. Despite proposed mitigations, Harbor View will:

1.  
  
exacerbate the City's current jobs-housing imbalance by significantly driving up housing demand (~5,500 jobs and no housing),
  
2.  
  
erode the capacity for Redwood City to broaden its economic base via light-industrial uses,
  
3.  
  
hinder the ability to preserve and expand the Port of Redwood City and its supporting industries,
  
4.  
  
bring thousands of more cars daily to an area that does not have the infrastructure to support so much traffic, and
  
5.  
  
center a significant portion of Redwood City's office growth away from Downtown



and mass transit.

The Harbor View project is asking for zoning and land use changes that are not warranted, and which you should deny, given their vastly unsuitable nature for this location. It is currently zoned as light-industrial, which is very appropriate for this area and already allows for a significant amount of diversified development.

Lastly, given such extreme adverse and unmitigated impacts, there will be no real benefits brought to the community by this project. I hope that in the discussion on Monday night, you will clarify that Jay Paul's donations to community-based organizations and non-profits do not make up for the project's overall depletion of the City's coffers to pay for the tens of millions of infrastructure that is needed to absorb the added population density that will be a byproduct of this project. Let us not confuse impact fees with true community benefits.

Thank you for your consideration.

Rachel Holt

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**Letter 79**      **Rachel Holt**  
**Response**      February 11, 2019

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79-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** Mike Holubar [<mailto:mholubar@gmail.com>]  
**Sent:** Sunday, January 20, 2019 9:22 PM  
**To:** CD-Steven Turner <[sturner@redwoodcity.org](mailto:sturner@redwoodcity.org)>  
**Subject:** RWC Plan & Jay Paul Co

Dear Mr. Turner,

I was dismayed and alarmed that Redwood City might, for even a minute, consider changing the city plan to allow Jay Paul Co. to develop the area east of Bayshore in their proposed manner.

I attended 2 neighborhood info sessions sponsored by J. Paul Co. They both were blatant attempts to sway local neighbors with abundant wine and tons of food to see their way regarding their development plan.

You must agree that we already have reached gridlock. On Woodside Road, I find it backed up from Bayshore all the way to Lucky Plaza and 8:30 or 9am during the week! I have to take back streets like Roosevelt, Oak or even Palm to get downtown!

How can it make sense to add offices for 4,000+ workers and not add corresponding local housing nor expand the other aspects of the infrastructure?

I was interested to see Gov Newsome's recent idea to tie revenue from gas taxes to the degree that the local counties build sufficient housing for workers so they don't have to commute so far. I think this a very reasonable proposal, and I think something similar should be required of the J. Paul Co: equal numbers of housing units to accommodate equal numbers of workers intended for the office development. AND, J Paul Co should be required to foot the entire bill for any necessary infrastructure expansion, e.g., sewers, waste treatment, roads, interchange expansion.

I understand also that Sobrato has proposed more office space where the CVS shopping center is by 101/Woodside Rd. They too should be required to provide equal numbers of housing units for the corresponding numbers of workers they expect to occupy these new offices. And ditto the pre-requisite of bearing the cost of infrastructure expansion.

If you want to see a comic rendering of J Paul's future vision of the development, just look on their website and the artistic rendering; *only add 50x the autos on 101 in both directions!*

Please DO NOT change the city plan to enable J Paul to choke our lifestyle and skip away to the bank leaving local residents holding his bag of garbage.

Sincerely,  
Michael Holubar  
1587 Fernside St.  
RWC resident of 35 years.  
650.255.1003 (cell)

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**Letter 80**      **Michael Holubar**  
**Response**      January 20, 2019

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80-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Cheerie Howse](#)  
**To:** [GRP-City Council](#)  
**Subject:** General Plan amendment  
**Date:** Friday, February 08, 2019 4:22:00 PM

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Dear Council Members,

Please **DO NOT approve a General Plan amendment and zoning change for the Harbor View Draft.** Our General Plan has been very responsible in meeting current housing needs as quickly and effectively as possible. This new office space takes opportunities for light industry away from land that is perfect for industrial use. We don't need more workers in office buildings creating burgeoning housing needs and using up limited water resources and adding to the enormous traffic congestion we already have in Redwood City. **Instead we should be encouraging clean light industrial companies perfectly suited to this land space to come in and provide training and jobs for our unemployed and homeless right here in Redwood City.**

**PLEASE DO NOT MODIFY OUR GENERAL PLAN FOR THIS PROJECT.**

It will open the door for others to flood in and fill in the salt flats for housing and more offices ignoring the problem of increasing water levels and future flooding which ultimately will cost our city millions of needless law suits and waste our tax money.

I am counting on you to hold strong on NOT modifying the General Plan.

Thank you for you efforts in behalf of the residents of Redwood City.

Sincerely,  
Cheerie Howse  
967 Johnson Street  
Redwood City, CA 94061

**Letter 81**      **Cheerie Howse**  
**Response**     February 8, 2019

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81-1                To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Carol Hubenthal](#)  
**To:** [GRP-City Council](#)  
**Subject:** Office towers  
**Date:** Thursday, February 7, 2019 2:24:17 PM

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This is horrible news and I certainly hope you will turn down such a massive project. I am a Sierra Club member and a Committee for Green Foothills member. I understand the need for housing (but not that massive in that spot) BUT more office buildings just make our housing crisis worse. Tall buildings need to be near public transportation not near the bay!

Sincerely,  
Carol Hubenthal

Sent from my iPhone

**Letter 82**      **Carol Hubenthal**  
**Response**     February 7, 2019

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- 82-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Hitesh Jadav](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project... It just doesn't make sense!  
**Date:** Saturday, February 09, 2019 2:05:02 PM

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Dear Council Members,

Hello. I'm a Redwood City resident for 5+ years. I live at One Marina, the development on the other side of the highway behind Courtyard by Marriott. I'm reaching out to you today to express my concern about the environmental impact of the 1.2M s.f. Harbor View office project by Jay Paul Company.

As you know, even now the Woodside Rd, Veterans Blvd & Highway 101 intersection can't handle existing traffic. I traverse that intersection on a regular basis going to and from my home to 24 Hour Fitness and the US Post Office and I'm regularly caught in traffic congestion.

On top of an already bad situation, more traffic will hit the same intersection from Council approved Broadway Plaza project at 1055 Broadway & Woodside Rd that consists of 500+ housing units, 420,000 s.f. office and 26,000 s.f. of retail. That's a big project as it is and one that got approved despite the expected increase in traffic.

Given the current and expected increased traffic from Kaiser Permanente hospital expansion and Broadway Plaza, it just doesn't make sense to add another project that can only exacerbate an already bad traffic situation.

Beyond traffic, why are we approving a project on the other side of the highway where you don't have amenities such as restaurants and no public transit? I feel Redwood City is already overdeveloped and I urge Council to not approve entitlements for the Harbor View project. Thank you.

Tesh

PS. I've already seen Jay Paul Company's dog and pony show about Harbor View extolling all the tax benefits and down playing all the negative impacts of the project. I don't buy it! Council shouldn't buy it. This project just doesn't make sense

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Tesh Jadav  
(415) 517-7769

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**Letter 83**      **Hitesh Jadav**  
**Response**      February 9, 2019

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83-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics.

**From:** [Brian Jaffe](#)  
**To:** [GRP-City Council](#)  
**Subject:** Resending VOCA polls about Harbor View  
**Date:** Monday, February 11, 2019 12:13:16 PM  
**Attachments:** [VOCA RWC Harbor View responses.pdf](#)  
[VOCA RWC Harbor View #2.pdf](#)

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Dear Redwood City City Council Members,

As you consider the Harbor View project at this evening's meeting, I'd like to resend you the results of two different polls VOCA has run about the project. The first poll was asked 7/20/2017, and the second was asked 5/10/2018.

Best regards,

Brian Jaffe



Like us on [Facebook](#), follow us on [Twitter](#)  
Sign up for VOCA today at <http://voca.vote>

**Letter 84**      **Brian Jaffe**  
**Response**      February 11, 2019

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- 84-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Allyson Johnson](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please do not allow office towers to be built on bay frontage land!  
**Date:** Thursday, February 07, 2019 12:48:55 PM

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Dear Sirs:

I am dismayed to hear about projected development of office space for 4500 workers off of Woodside Road on the bay side of 101.

One key question is: where are these 4500 workers going to live? Redwood City is already facing a critical housing shortage, and the traffic getting on and off Woodside Road to access the existing office park is already congested. Unless the development includes housing for 4500 workers, the net impact on the community will be very bad.

A second key question is: how will such a development be impacted by climate change? We need our bay lands as a buffer against rising bay levels.

A third key question is: How will workers (and residents, if the project is changed to accommodate them) be able to reach safety in case of a natural disaster? I was working in the Woodside Road office complex at the end of Woodside Road at the time of the Loma Prieta earthquake. That development had only one way in and out - along Woodside Road. It was at least 2 hours before I was able to leave the office park and get on the road to find out what had happened to my family and home. Adding another 4500 people in high-rise towers would be a logistical nightmare in case of another earthquake.

Please stick to current zoning and refuse this ill-thought development project.

Cordially,  
Allyson Johnson  
855 Arroyo Road  
Los Altos, CA

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Check out my blog at [www.allysonjohnson.com](http://www.allysonjohnson.com) - and don't forget to comment if you visit!

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**Letter 85**      **Allyson Johnson**  
**Response**      February 7, 2019

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85-1            The comment asks how Project occupants will safely evacuate the Project site during a natural disaster, which is not an environmental consideration under CEQA. Refer to Section 4.5, *Geology and Soils* and Section 4.7, *Hazards and Hazardous Materials*, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's jobs/housing balance, also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR.

**From:** [Mona Jones-Romansic](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 9:21:59 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Mona Jones-Romansic

Vancouver 98664

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**Letter 86**      **Mona Jones-Romansic**  
**Response**      February 8, 2019

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86-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Further, the commenter notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project. Also see Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Marty Jordan](#)  
**To:** [GRP-City Council](#)  
**Subject:** Save the Baylands!!!  
**Date:** Thursday, February 07, 2019 8:44:31 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill salt ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Marty  
Climate Change Activist  
Concerned Citizen of San Mateo County



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**Letter 87**      **Marty Jordan**  
**Response**      February 7, 2019

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87-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. See Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** Darren K <[darren2dream@gmail.com](mailto:darren2dream@gmail.com)>  
**Subject:** **Opposition to Harbor View Project.**  
**Date:** February 8, 2019 at 7:44:48 AM PST  
**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

City Council members,

Please do not continue forward with the review process for the Harbor View project.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you,  
Darren Karopczyc  
Redwood City resident for 10 years.

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**Letter 88**      **Darren Karopczyc**  
**Response**      February 8, 2019

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88-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Judith Kirk](#)  
**To:** [GRP-City Council](#)  
**Subject:** Council Meeting, Monday evening, Feb. 11, 2019  
**Date:** Sunday, February 10, 2019 8:04:40 PM

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I had planned to attend the meeting and to speak on the Harbor View issue, but illness has prevented my attendance. However, I want to register my vehemently strong protest to this development.

First, this is for more offices, of which we have too many already. Adding 2000 more workers who need housing is clearly absurd; we already have a severe housing shortage. Also, office developments of this kind need to be built close to transportation hubs, not across the freeway where already there are inadequate ways to cross it to get to downtown.

It is VERY significant that the planning commission (known for approving almost anything, unlike that of other cities around us) said NO to this development, and that there are significant and serious obstacles to this development cited in required reports. One does wonder why the previous Council approved this development in light of the above information... Actually, it isn't just this one who is wondering; many, many Redwood City citizens are wondering this as well. And many of them voted for a new Council in the last election— which I hope and believe we did achieve.

I realize how strident I sound, and this is a reflection of the frustration so many of us have felt for years now. We know that we have not been listened to or even considered, as the many developments were approved and built. The apartments that have been built are clearly not for middle class citizens or those who need even more assistance with housing than middle class citizens need.

In closing, just the fact that Harbor View is for offices should easily bring a NO vote from the Council. There is no way to rationalize building this development. So many of us hope and trust that this Council of 2019 will be one of caring for everyone in the city, one that carefully researches the required reports regarding all proposed developments, one that sees the big picture for the city and what the future is projected to bring to us in terms of stronger storms and rising seas— and the even greater increased need for affordable housing. We do have great hope for this Council; I attended the swearing in of the members and could see the talent and experience on this council, and the humanity of its members.

Thank you and sincerely,

Judith S. Kirk  
272 Nevada St., RC, 94062

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**Letter 89**      **Judith Kirk**  
**Response**      February 10, 2019

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89-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to jobs/housing balance, see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Ko Kim](#)  
**To:** [GRP-City Council](#)  
**Subject:** Port Meeting  
**Date:** Thursday, February 07, 2019 12:08:23 PM

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Thank you for studying this matter over zoning and for hosting a meeting.

The housing crunch is a real concern for us all, so this step to study the impact of a commercial building near the port—with repercussion on Woodside Road and in our neighborhood—is key.

**Letter 90**      **Kim Ko**  
**Response**      February 7, 2019

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- 90-1              See Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Bill Korbholz](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 4:31:45 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Bill Korbholz  
Emerald Hills 94062

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**Letter 91**      **Bill Korboholz**  
**Response**      February 8, 2019

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91-1                      To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Further, the commenter notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR. Also see Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Mel Kronick](#)  
**To:** [GRP-City Council](#)  
**Subject:** Why the Harbor View Development Should Be Stopped  
**Date:** Thursday, February 7, 2019 3:48:20 PM

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Dear Mayor Bain and City Council members,

Redwood City has been very impressively developing both housing and office space over the past few years. A key feature of this has been the proximity of housing to office space and transportation (especially Caltrain). The new Harbor View Project takes Redwood City in a different and bad direction. Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sincerely,

Mel Kronick  
Palo Alto Resident

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**Letter 92**      **Mel Kronick**  
**Response**      February 7, 2019

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92-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Wendie Lash](#)  
**To:** [GRP-City Council](#)  
**Subject:** Objection to Harbor View Project  
**Date:** Friday, February 08, 2019 11:15:59 AM

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Dear Redwood City Council Members,

I have lived in Redwood City for the past 20 years. I teach at the Redwood City YMCA. I participate in various community volunteer projects and love the new court house space that allows us to be part of the larger civic discourse of our country in our own community. I am a proud resident of Redwood City.

The city has changed and grown over the time we have lived here and raised our son. I am in support of the changes that include more housing, better non-car transportation options, and revitalizing the downtown area. But not all growth and change is responsible.

I wish to register my objection to the new Harbor View project and the rezoning in this area to accommodate this massive office project. There is already not enough housing and too many vehicles on our roads. We need to build businesses along transit routes like the Caltrain or El Camino, not in the baylands area.

How would increasing traffic on Highway 101, near the already congested Woodside Road interchange, be a step in the right direction for the city and to combat climate change? If this project was for more housing, I would likely support it, even with the increased traffic as the housing shortage is making living in the area unaffordable for so many. But to support this massive commercial enterprise on our bay, how can you think this is a good idea?

I'm also worried about our port, which is a unique recreational and educational resource. And how it would be impacted by this development.

I ask you to vote against changing the zoning in this area and for not moving forward with this project.

Thank you for your consideration,

Wendie

Wendie Bernstein Lash, M.S.  
spiritual guidance and supervision ~ meditation ~ chanting  
[www.wendielash.com](http://www.wendielash.com) ~ 650-365-6093

*It's our insides that make us who we are, that allow us to dream and wonder and feel for others. That's what's essential. That's what will always make the biggest difference in our world. - Fred Rogers*

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**Letter 93**      **Wendie Lash**  
**Response**      February 8, 2019

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93-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Mary Lasley](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Wednesday, February 06, 2019 11:41:49 AM

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Dear Mayor Bain and City Councilmembers,  
Re: Harbor View Development  
Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that

supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the

Woodside Road interchange, which is already very seriously impacted.

In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

Yet another major concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, requires over 2,000 homes to support it. Developing massive offices north of 101, will put pressure on providing housing on the north side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community in the recent past.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Mary Lasley

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**Letter 94**      **Mary Lasley**  
**Response**      February 6, 2019

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94-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Jennifer LeBlanc](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please oppose Harbor View project  
**Date:** Friday, February 08, 2019 10:53:39 AM

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Dear Mayor Bain and City Councilmembers,

Please halt the review process for the massive Harbor View project. We strongly urge you to discontinue this project for economic, traffic, and environmental reasons.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it. Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

Yet another major concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, requires over 2,000 homes to support it. Developing massive offices north of 101, will put pressure on providing housing on the north side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community in the recent past.

Perhaps most importantly, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

Finally, I am deeply concerned about worsening traffic congestion, which is already terrible.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Jennifer LeBlanc & Roch LeBlanc  
Burlingame, California

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**Letter 95**      **Jennifer LeBlanc**  
**Response**      February 8, 2019

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95-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Kim](#)  
**To:** [GRP-City Council](#)  
**Subject:** Against Harbor View Project  
**Date:** Thursday, February 7, 2019 1:59:32 PM

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Please don't move forward with the Harbor View project. The jobs-housing imbalance and overcrowded traffic alone should prevent any new offices to be built. But this project will also have a negative effect on the environment at the port.

Thank you,  
Kim Lemmer  
Palo Alto

**Letter 96**      **Kim Lemmer**  
**Response**      February 7, 2019

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96-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Susan Lessin](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor view Development  
**Date:** Wednesday, February 06, 2019 4:46:40 PM

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Dear Mayor Bain and City Councilmembers,

**Re: Harbor View Development**

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted.

In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

Yet another major concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, requires over 2,000 homes to support it. Developing massive offices north of 101, will put pressure on providing housing on the north side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community in the recent past.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Susan Lessin  
Foster City

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**Letter 97**      **Susan Lessin**  
**Response**      February 6, 2019

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- 97-1      With respect to the comment to land use, and traffic impacts, refer to Section 4.9, *Land Use and Planning* and Section 4.14, *Transportation and Traffic* of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1; also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.
- Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. However, all comments will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Rose Linn](#)  
**To:** [GRP-City Council](#)  
**Subject:** Towers project  
**Date:** Thursday, February 07, 2019 1:17:56 PM

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It doesn't make any sense thinking about putting any building project on land that would be affected by raising water from climate change. In San Francisco the concern is the deteriorating sea wall on the Embarcadero. Why disregard scientific evidence and then create problems in the future.

Rose Linn

**Letter 98**      **Rose Linn**  
**Response**     February 7, 2019

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98-1                To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.



**From:** [Thalia Lubin Lubin](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 3:03:22 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. It really is a stupid idea. Thank you for your consideration.

Thalia Lubin Lubin  
Redwood City 94062

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**Letter 99**      **Thalia Lubin**  
**Response**      February 8, 2019

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99-1            The comment notes the air quality and traffic impacts in Section 4.4, *Air Quality* and Section 4.14, *Transportation and Traffic* of the Draft EIR. With respect to the comments related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment, see Master Response 1; also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Valerie Lui](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 5:10:36 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Valerie Lui  
Redwood City 94061

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**Letter 100**     **Valerie Lui**  
**Response**     February 8, 2019

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100-1            The comment notes the air quality and traffic impacts in Section 4.4, *Air Quality* and Section 4.14, *Transportation and Traffic* of the Draft EIR. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1; also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Susan MacDonald](#)  
**To:** [GRP-City Council](#)  
**Subject:** Lyngso site  
**Date:** Saturday, February 09, 2019 4:56:53 PM

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Office towers in our bay. What are your priorities?

The tides, the winds, wildlife, not to mention the view over water - all are a precious commodity that is being squandered by the greed of developers of hi rise buildings. are we short of office space?

Is the city looking for income?

El Camino is becoming a tunnel through Redwood City. The Bay should not follow suit.

Keep it low. Tides will rise!

Susan MacDonald (longtime resident)

Sent from my iPhone

**Letter 101**     **Susan MacDonald**  
**Response**     February 9, 2019

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- 101-1            To the extent that this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Chris MacIntosh](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Thursday, February 07, 2019 10:09:57 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted, and is about to become more impacted when Stanford Redwood City opens. Not least, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community and which I vehemently oppose.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Chris MacIntosh  
Redwood City

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Chris MacIntosh

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**Letter 102**      **Chris MacIntosh**  
**Response**      February 7, 2019

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102-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14 *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** Emerald Hills <[emeraldhills@gmail.com](mailto:emeraldhills@gmail.com)>

**Subject:** Harbor View Project

**Date:** February 7, 2019 at 8:49:17 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Redwood City Council members,

Please do not allow the Harbor View project to be built as it does not appear to be environmentally sound and would contribute to degrading the experience of living in Redwood City. Do not let greed and shortsightedness prevail. Thanks.

Khorshed Madan

Sent from my iPhone

**Letter 103**     **Khorshed Madan**  
**Response**     February 7, 2019

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- 103-1            See Master Response 4 in Chapter 5 of this Final EIR. This comment does not present information on specific environmental issues, and generally conveys the opinion of the commenter as to how the Project should or should not be developed. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Patricia Mahoney](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Friday, February 08, 2019 7:20:56 PM

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Dear City Council,

As a concerned long-time resident, homeowner and native of San Mateo County,

I oppose the current proposal for the project known as Harbor View.

This site, currently zoned for light-industrial use should remain as such. That designation brings a diversity of productivity and innovation in a reasonable scale to our community.

The over-sized proposal, bringing many thousands of commuters and possible new residents would burden our infrastructure beyond its already strained capacity.

Please consider carefully.

Thank you  
Patricia Mahoney

**Letter 104**     **Patricia Mahoney**  
**Response**     February 8, 2019

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- 104-1            See Master Response 4 in Chapter 5 of this Final EIR. This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** Tim [<mailto:paragon007@comcast.net>]  
**Sent:** Thursday, February 07, 2019 8:05 AM  
**To:** CD-Steven Turner <[sturner@redwoodcity.org](mailto:sturner@redwoodcity.org)>  
**Subject:** Harbor View Place (Jay Paul Company)

Dear Mr. Turner;

I received notification in my North Fair Oaks community blob about the upcoming meeting about the old Malibu Raceway and Golf Course project and unfortunately cannot make the meeting. However I do wish to comment.

I have watched the Peninsula transform at a very rapid pace over the last several years. It is becoming a dense megalopolis of multi-story buildings at the expense of all the small buildings and businesses that have made the peninsula what it is today. The arts in particular are getting squeezed out along with everything else that is not about the dollar. Affordable space is difficult to find for artistic endeavor. The dance community among other arts and indoor sports require a lot of open area that can be monetized for other more profitable enterprises. To be clear, the arts are not about dollars per square foot, and bottom line return investment return. The arts are about quality of life and well being.

Loosing the Malibu Raceway and Golf Course was not exactly an artistic loss but it was a clearly a great community loss. I believe in capitalism but not at the expense of quality of life. In an ideal world the proposed project would carve out a community space.

"The proposal would redevelop the 27.08 acre site at 320–350 Blomquist with the development of a high tech office campus consisting of 1.2 million square feet of office space within four seven-story buildings and a 35,000 square foot two-story amenity building including surface parking, two parking structures, and landscape improvements. The project includes a request for General Plan and Zoning Map Amendments."

I would expect that out of 1.2 million square feet of office space there would be something in it for the tax paying community that supports the government that approves projects like this to ask for a modest 1/2 of one percent, 6,000 square feet for a community center like the Cubberly Center at 4000 Middlefield Road in Palo Alto.

Thank you, Tim Makovkin

415.730.9933

**Letter 105**     **Tim Makovkin**  
**Response**     February 7, 2019

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- 105-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Kent Manske](#)  
**To:** [GRP-City Council](#)  
**Subject:** Public Comments on the Harbor View Draft EIR  
**Date:** Monday, February 11, 2019 12:10:09 PM

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In the 1800's, we were not looking ahead and we cut down the ancient redwood trees West of our city. A resource sadly depleted by lack of vision.

Consideration of turning our Bay coast properties east of 101 into massive office complexes would be just as foolish. Who would bear the loss– future generations. Who would make such a selfish decision– public officials and citizens not in tune with the reality of cultural loss.

Please DO NOT rezone this property and destroy this coastal area of Redwood City. Leave the current General Plan alone.

Please think beyond this Century. If we had had visionary leaders in the 1800's our 2000 year old redwood trees would be visible from our proud city and our proud Redwood City Hall.

Keep us proud. Do not be tempted by greed.

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**Kent Manske**  
33 Dexter Ave, Redwood City

**Letter 106**     **Kent Manske**  
**Response**     February 11, 2019

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- 106-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Pat Marriott](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please say NO to Harbor View  
**Date:** Friday, February 08, 2019 12:13:49 PM

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Honorable City Council Members:

I hope you will recognize the significant negative impacts this project would bring to Redwood City and surrounding areas.

- It will significantly worsen the jobs/housing imbalance at a time when we already have a housing crisis.
- It will substantially increase traffic congestion in what is already a highly congested stretch of Highway 101.
- It will move commercial and office growth to an area with no mass transit.
- The infrastructure will not support this project and the increased population it brings.
- The proposed impact fees and donations are in no way adequate to mitigate the downsides of this massive development.

Please just say NO.

Thank you,

Patricia Marriott

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**Letter 107**     **Pat Marriott**  
**Response**     February 8, 2019

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107-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

                    With respect to the comment related to infrastructure and traffic impacts, refer to both Section 4.13, *Utilities and Service Systems* and Section 4.14 *Transportation and Traffic* of the Draft EIR, which provide the analysis related to the environmental impact topic. With respect to the project's employment density, see Master Response 1, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Shannon McEntee](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 5:44:49 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Shannon McEntee

Palo Alto 94306

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**Letter 108**     **Shannon McEntee**  
**Response**     February 8, 2019

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108-1            The comment notes the impacts associated with air quality and traffic as discussed in Section 4.4, *Air Quality* and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Zeke Mead](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Friday, February 08, 2019 9:24:20 AM

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RWC Council,

I cannot attend Monday nights meeting, but wanted to share my thoughts on the Harbor View project.

With unemployment at 2-3%, we don't need more jobs. More jobs will only exacerbate the lack of housing in the area, at all levels.

This location is NOT where we need to add anything due to the Woodside / 101 traffic congestion already difficult and increasing with the expanding Stanford development. If anyone wants to add 5000 jobs/housing they need to do it on a mass transportation artery that can handle the traffic.

Redwood City needs to diversify its industry mix by supporting light industrial (which is what this area is zoned for). If/when we have another .com bust or sub prime mortgage bust or \_\_\_\_\_ bust, we'll be happy to have an unaffected industry chugging along.

There was a time when Redwood City needed developers of any kind more than they needed us, but that time has passed and the relationship has changed, they need us more than we need them.

Let's look at the facts and make decisions in the best interest of RWC as a whole.

Thanks

Zeke

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**Letter 109**     **Zeak Mead**  
**Response**     February 8, 2019

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109-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, Land Use and Planning, and Section 4.14 Transportation and Traffic, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [naturemend@sbcglobal.net](mailto:naturemend@sbcglobal.net)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Sunday, February 10, 2019 7:26:37 PM

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Council Members,

Quality of life, sea level rise, infrastructure overload, uncontrollable traffic are some of the many reasons that the proposed Harbor View project SHOULD BE REJECTED.  
Please consider the lives of those already living and working here.

Sincerely,  
Debbie Mendelson  
*Sent from my MetroPCS 4G LTE Android device*

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**Letter 110**     **Debbie Mendelson**  
**Response**     February 10, 2019

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110-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that topic. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.



**From:** [Bill Michel](#)  
**To:** [GRP-City Council](#)  
**Subject:** Nix Harbor View  
**Date:** Thursday, February 07, 2019 12:07:22 PM

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Dear Councilmembers,

This project will exacerbate the jobs/housing problem, and put a bunch of jobs far from transit. With the predicted sea level rise, and the known issues with building on this sort of geology, there's just no up-side here.

I hope you will oppose this project.

Yours truly,

Bill Michel  
337 Lowell ST.

**Letter 111**     **Bill Michel**  
**Response**     February 7, 2019

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111-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.

**From:** [Martha Moga](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Thursday, February 07, 2019 9:25:45 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Martha Moga, Sierra Club Loma Prieta chapter member  
Foster City

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**Letter 112**     **Martha Moga**  
**Response**     February 7, 2019

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112-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment on land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Robin Montoya](#)  
**To:** [GRP-City Council](#)  
**Subject:** No to the Harbor View Project!  
**Date:** Thursday, February 07, 2019 8:57:19 AM

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Please do not continue forward with the review process for the massive Harbor View Project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

There are multiple, important reasons to not move forward with the project: affect on the current industries, it will worsen traffic congestion, and it will contribute to the jobs/housing imbalance.

Please do not continue with the Project.

Thank you for your consideration.

Robin  
Burlingame (work near the yacht harbor Redwood City)

[Sent from Yahoo Mail on Android](#)

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**Letter 113**     **Robin Montoya**  
**Response**     February 7, 2019

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113-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Beverly Morgan](#)  
**To:** [GRP-City Council](#)  
**Subject:** Save Our Baylands!  
**Date:** Thursday, February 07, 2019 10:05:20 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

**PLEASE SCRAP** this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Beverly Morgan  
Redwood City, CA 94062

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**Letter 114**     **Beverly Morgan**  
**Response**     February 7, 2019

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114-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [pattie](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Friday, February 08, 2019 10:03:41 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Patricia Murphy-Kracht  
Redwood City, CA

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**Letter 115**     **Patricia Murphy-Kracht**  
**Response**     February 8, 2019

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115-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Christine Nagel](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 3:02:34 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Christine Nagel

San Jose 95126

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**Letter 116**     **Christine Nagel**  
**Response**     February 8, 2019

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116-1            The comment notes the air quality and traffic impacts, discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the projects employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Sandra Nyholm](#)  
**To:** [Council-Ian Bain](#)  
**Cc:** [GRP-City Council](#)  
**Subject:** Re: Opposition for Harbor View project  
**Date:** Thursday, February 07, 2019 9:02:25 AM

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Hi Mayor Bain,

I greatly appreciate your consideration.

Sincerely

Sandra Nyholm-Goncalves

On February 7, 2019 at 8:48 AM Ian Bain <[ibain@redwoodcity.org](mailto:ibain@redwoodcity.org)> wrote:

Dear Ms. Nyholm-Goncalves,

On behalf of the City Council, thank you for writing to express your views on the proposed Harbor View project. We will discuss the draft environmental impact report next Monday's meeting, and your thoughts will be considered.

Respectfully,

Ian Bain



IAN BAIN

Mayor

City of Redwood City

Phone: (650) 780-7565

E-mail: [ibain@redwoodcity.org](mailto:ibain@redwoodcity.org)

[www.redwoodcity.org](http://www.redwoodcity.org)



On Thu, Feb 7, 2019 at 8:42 AM Sandra Nyholm <[sandranyholm@comcast.net](mailto:sandranyholm@comcast.net)>

wrote:

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sandra Nyholm-Goncalves  
316 Capstan Court  
Redwood City, CA 94065

**Letter 117**     **Sandra Nyholm**  
**Response**     February 7, 2019

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117-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 2 regarding sea level rise, and see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance. Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Kit O'Doherty](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View vs View of Cement Project  
**Date:** Thursday, February 07, 2019 8:08:14 AM

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Dear Mayor Bain and City Council members,

When I read about the Harbor View project a song popped into my mind: "Don't it always seem to go, that you don't know what you've got till its gone. Paved paradise, put up a parking lot".

Let's be forward thinking, forgo our fixation on the dollar, realize the treasure we've got and resist the urge to pave over it.

Thank you for your consideration.

Kit O'Doherty  
330 Mirada Rd  
Half Moon Bay, CA 94019  
(650) 560-9798



**Letter 118**     **Kit O'Doherty**  
**Response**     February 7, 2019

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- 118-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Julie Pardini](#)  
**To:** [GRP-City Council](#)  
**Subject:** RE: Feb 11, 2019 City Council Meeting: Harbor View Place (Jay Paul Company) General Plan Amendment, Update  
**Date:** Saturday, February 09, 2019 4:01:42 PM

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February 8, 2019

RE: Feb 11, 2019 City Council Meeting: Harbor View Place (Jay Paul Company)  
General Plan Amendment, Update

Dear Mayor Ian Bain,  
V. Mayor Diane Howard,  
Council Members

The last time someone promised you, “It won’t be so bad”,...was it true?

Those who are in favor of this Jay Paul Company project have attempted to provide assurances to us that:

1. The many and serious negative impacts of the project are “not as bad as they seem”.
2. And, even IF that bad,...IF we will just wait 20 years, they may be corrected by then.
3. To that end, this company is actually requesting a General Plan Amendment to be approved, so that they can go forward with the Harbor View Place Project—even though it will be harmful to Redwood City.

Twenty years is a very long time.

Too long to have to live in the kind of mess this project will create for Redwood City and nearby cities, for years to come—in traffic impacts and in housing, (to name just two impacts).

So, a question: just what do we do in the meantime, for those 20 years?  
An obvious and a justifiable question, if I do say so myself.  
With just as obvious an answer.

The developer’s visionary dream of a “Harbor View Place” development, may well become Redwood City’s continuing nightmare.

I hope the Council will use their legitimate right to deny this project going forward, based on the overwhelming evidence of identified long-term, serious, unmitigatable negative impacts to Redwood City.

This time, Jay Paul Company has asked too much of Redwood City.

This company is not entitled to expect approval of a project that not only does not conform to the General Plan, but more: will exacerbate present existing problems that this city’s leaders have been actively searching for the ways and means to remedy.

It is in Redwood City's best interest to deny this project.

We need projects which will be beneficial to the City of Redwood City, ones that will safeguard our future, ones that provide remedies for current, ongoing, and predictable future challenges; and ones that protect and enhance our quality of life.

Harbor View Place is not that kind of development. And it never will be, regardless of minor "plan revisions" that may be offered as a solution.

It will place the city in the untenable and unavoidable position of damage control for years to come.

Sincerely,

Julie Pardini

**Letter 119**     **Julie Pardini**  
**Response**     February 11, 2019

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- 119-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Carol Park](#)  
**To:** [GRP-City Council](#)  
**Subject:** RWC resident view on Harbor View project draft EIR  
**Date:** Monday, February 11, 2019 1:28:10 PM

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Dear Council Members,

I urge you to reject the Council's 2017 decision to amend the General Plan so as to allow the Harbor View project. Why?

I am deeply concerned about:

- the impact on traffic. The intersection of 101 and Woodside Road is ALREADY awful at key times. Today as I drove on Woodside Rd from the YMCA at 8:30 AM, the traffic was backed up event before the 82 overpass. This proposal, if implemented, would mean this bad situation would become terrible. The proposed ways to deal with the increased traffic - if this project is accepted - are not enough.
- the impact on air pollution. Residents will likely not work in the same area as they live and access to train will be difficult. With traffic worsening, in commuter time periods, even if someone desired to use Cal Train, it would take 20-40 minutes to reach the station.
- additional housing should be placed near mass transit - preferably within a half mile of the Cal Trains station which also serves as a bus hub and gives easy access to groceries and eateries. This kind of housing would not be nearly as like to increase traffic congestion and worsen air quality.
- Our Planning Commission already rejected this proposal because of it will induce or increase gridlock and will NOT contribute to affordable housing
- Development on the site needs to be done withIN the General Plan.

Please don't let commercial developers sweet talk you into what will harm our quality of lives and the ability of the young people and other worker to live here.

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Carol L. Park  
Writer, Editor, ESL tutor  
<http://carolpark.us/>

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**Letter 120**      **Carol Park**  
**Response**      February 11, 2019

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120-1              With respect to the comment related to air quality and traffic impacts, refer to Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [collin](#)  
**To:** [GRP-City Council](#)  
**Subject:** RC resident comments on proposed Harbor View project Draft EIR  
**Date:** Sunday, February 10, 2019 8:13:59 PM

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Council Members,

I'm writing today to urge you to reconsider Council's 2017 decision to amend the General Plan to accommodate Harbor View. As I understand from the Staff report dated Feb 11, 2019, the project's impact on traffic will be considerable, even with any and all proposed mitigations. The Woodside/101 interchange is already terrible, as I expect you know. The report also notes other environmental impacts, such as air pollution.

In addition to the considerable environmental impacts, this project would exacerbate our region's terrible jobs/housing imbalance. Can your kids afford to buy a home here?

We need housing near mass transit (within half a mile of Sequoia Station, say), \*not\* a gridlock-inducing, housing-affordability-destroying project that our Planning Commission already rejected. If we develop on that site, let's do it within what the General Plan and current zoning allow! Let's not make Woodside/101 even worse, and make it even less likely that our kids can afford to live here.

Thanks for reading

Collin Park

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**Letter 121**      **Collin Park**  
**Response**      February 10, 2019

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121-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.



**From:** [Susan Pellizzer](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 4:34:12 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Susan Pellizzer  
Redwood City 94063

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**Letter 122**     **Susan Pellizzer**  
**Response**     February 8, 2019

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122-1            The comment notes the air quality and traffic impacts, discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Lonnyangel](#)  
**To:** [GRP-City Council](#)  
**Subject:** Regarding Harbor View/J.Paul Project  
**Date:** Friday, February 08, 2019 3:38:34 PM

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Dear City Council Members:

This is a short and humble plea to urge you to carefully consider the negative impacts of the J. Paul Harbor View Project on the entirety of our city and our precious, truly fragile, environment.

Simply, please *please* do **not** approve or allow the Harbor View Project to advance nor allow changes to zoning and land use in this fragile area of Redwood City. This is a terrible plan only in the works to benefit the pockets of the developer and those who are invested in building yet one more office park in our area. The entire peninsula is inundated with office parks. And this is a terrible idea that would overwhelm our town by creating more inbound traffic, more pollution, overcrowding, et al.

With respect toward all those who are submitting to you their thoughts on this plan and those many letters that may come before your perusal, we wish to keep our plea short and in the company of those others who also know that this is not a project we want, or need, in Redwood City.

Thank you for your consideration and contemplation,

Lonny and Richard Pini  
Redwood City, CA

**Letter 123**     **Lonny Pini**  
**Response**     February 8, 2019

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123-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Diana Post](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 4:26:06 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Diana Post  
Redwood City 94061

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**Letter 124**     **Diana Post**  
**Response**     February 8, 2019

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124-1            The comment notes the air quality and traffic impacts, discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Thomas Pressburger](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#); [Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Saturday, February 09, 2019 5:21:36 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. In short, it is too far from mass transit and too close to the bay given inevitable sea level rise. It seems to me it'll further jam up 101 and exacerbate the lack of housing. Redwood City already has a city plan, is this project really consistent?

The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Thomas Pressburger  
Redwood City 94061

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**Letter 125**     **Thomas Pressburger**  
**Response**     February 9, 2019

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125-1            The comment notes the air quality and traffic impacts, discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [audrey q](#)  
**To:** [GRP-City Council](#)  
**Subject:** Massive Harbor View Project  
**Date:** Thursday, February 07, 2019 8:07:52 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill Salt Ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Audrey Quintero  
Redwood City

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**Letter 126**     **Audrey Quintero**  
**Response**     February 7, 2019

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126-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the project's employment, see Master Response 1. Refer to Master Response 2 to address sea level rise, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance. Also see Master Response 3, which addresses the Draft EIR's consideration of housing demand.

**From:** [Sonia Rackelmann](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Friday, February 08, 2019 6:51:05 PM

---

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill salt ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sonia Rackelmann  
205 Stambaugh St.  
Redwood City, CA  
[sonia.rackelmann@gmail.com](mailto:sonia.rackelmann@gmail.com)

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**Letter 127**     **Sonia Rackelmann**  
**Response**     February 8, 2019

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127-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. See Master Response 2 regarding sea level rise, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Rachelle Rasmussen](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Friday, February 08, 2019 7:44:40 PM

---

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Rachelle Rasmussen  
Belmont, CA

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**Letter 128**      **Rachel Rasmussen**  
**Response**      February 8, 2019

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128-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. See Master Response 2 regarding sea level rise, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Will Risseuw](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Tuesday, February 05, 2019 9:35:51 PM

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Dear Council,

Please don't approve this huge development. It will severely impact Redwood City traffic, it isn't near any public transportation, it will add thousands of cars to already very congested 101 and it is being built on what will, one day, be under water.

Thank you for doing the right thing,  
William Risseuw  
817 Seminole Way  
Redwood City, CA 94062

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**Letter 129**     **William Risseuw**  
**Response**     February 5, 2019

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129-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that topic. Regarding comments about being “underwater,” see Master Response 2 regarding sea level rise in Chapter 5 of this Final EIR.



**From:** [Merrily Robinson](#)  
**To:** [GRP-City Council](#)  
**Subject:** Our Redwood City!  
**Date:** Thursday, February 7, 2019 1:44:29 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.  
Merrily Robinson  
952 Ruby St  
Redwood City, CA 94061  
Sent from my iPhone

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**Letter 130**      **Merrily Robinson**  
**Response**      February 7, 2019

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130-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Aviva Rochester](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Saturday, February 09, 2019 9:24:51 AM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Aviva Rochester  
Redwood City 94061

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**Letter 131**     **Aviva Rochester**  
**Response**     February 9, 2019

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131-1            The comment notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the Project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Marc Roddin](#)  
**To:** [CD-Lisa Costa-Sanders](#)  
**Subject:** Comment Letter: Harbor View Project DEIR  
**Date:** Saturday, January 19, 2019 12:21:05 PM

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Thank you for providing the public an opportunity to review this important document.

I have one comment, relating to the transportation analysis. Given that Table 4.14-20 shows that north of Whipple, NB 101 PM freeway level of service deteriorates from E to F under to Cumulative Impacts, corresponding mitigation measure TRANS-28A needs to be enhanced. Specifically, the applicant should develop and present to the City an implementation and funding plan, which includes a cost estimate for the proposed mitigation, as well as a funding plan, including identification of any new revenues that are necessary and the steps required in order to secure those funds. This should all be in addition and supplemental to the draft language that has been presented for mitigation measure TRANS-28A.

Thank you for your consideration.

Marc Francis Roddin  
1432 Ernestine Ln, Mountain View, CA 94040

**Letter 132**    **Marc Roddin**  
**Response**    January 19, 2019

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132-1            See response to comment 10-3 regarding modification to Mitigation Measure TRANS-28A.

**From:** [sandy.roos](#)  
**To:** [GRP-City Council](#)  
**Date:** Thursday, February 07, 2019 8:03:37 AM

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Please do not go ahead with the Harbor View Project. We need our wet lands and nature areas.

Sandy Roos

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**Letter 133**     **Sandy Roos**  
**Response**     February 7, 2019

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133-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Cindy Rosinski](#)  
**To:** [GRP-City Council](#)  
**Subject:** Malibu Gran Prix property  
**Date:** Friday, February 08, 2019 8:17:33 AM

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Good Morning Council,

I have just learned some important information regarding this new development land area at Malibu Gran Prix and became highly concerned with the number of employees that will work at the site. Firstly, where will the thousands of new employees live?? Housing in Redwood City is so full of tech and software workers they have filled the spaces.

Secondly, I'm sure all of you have tried to drive around town during commute times, and find it extremely aggravating. How will our roads be improved and made to handle the thousands of extra drivers?

**Please don't advance this project and do not change the zoning/land use in this area of the City for the Jay Paul project.**

Thank you for reading my valid concerns.

Cindy Rosinski  
190 Iris St.  
25 year residency

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**Letter 134**     **Cindy Rosinski**  
**Response**     February 8, 2019

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134-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [jon RUSTEEN](#)  
**To:** [GRP-City Council](#)  
**Subject:** Stop the harbor view project  
**Date:** Saturday, February 09, 2019 9:41:50 PM

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Rwc needs to stop this, 35 year resident and tax paying home owner.

Get [Outlook for Android](#)

**Letter 135**     **Jon Rusteen**  
**Response**     February 9, 2019

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135-1            To the extent this e opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [steve.rutledge](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please protect the precious baylands from the Harbor View Project  
**Date:** Thursday, February 07, 2019 1:07:04 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sincerely,

Julie Beer  
334 College Ave. Apt. E  
Palo Alto, CA 94306

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**Letter 136**     **Steve Rutledge**  
**Response**     February 7, 2019

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136-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [J Schlock](#)  
**To:** [GRP-City Council](#)  
**Subject:** No Office Project at Malibu Grand Prix  
**Date:** Thursday, February 07, 2019 8:12:58 AM

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Dear Members,  
Stop developing in this area!  
Develop in higher areas! I am not against developing high density housing or business; just not here!  
Thanks,  
Jeff Schlocker

**Letter 137**     **Jeff Schlocker**  
**Response**     February 7, 2019

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- 137-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [kathy segura](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View  
**Date:** Friday, February 08, 2019 11:06:15 AM

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Dear Redwood City Council Members,

I am writing to share with you that I am opposed to any zoning or land use changes to potentially accomodate the Jay Paul Harbor View project. I would like to see this precious land resource used to expand on the opportunities for industrial businesses or possibly more supportive uses regarding the Port of Redwood City.

This is my home town, and as it continues to expand and develop I'd like to not see more housing built away from public transit. I'd not like to see so little benefit in terms of the citizens themselves when new housing does happen to be built. The city needs to make a much stronger commitment to affordability for renters. I'm a long term childcare provider, Montessori teacher for 28 years now Nanny, and with the increase in rent I can barely hold on much longer. I already work so much that my idea of a "good time" is a free two hours to enjoy a book in my living room before I fall exhausted into bed. I work and hustle so much to afford rent I feel like I'm just a cog in the wheel. Mine is a noble, important job and yet all it affords me in finances is the ability to live in CONSTANT housing anxiety due to ever increasing housing costs.

Enough is enough. My own Five Year Plan is to leave the city, after a lifetime here. I just hope I can hold on til my youngest is out of high school. Please look to the needs of your constituents, and the best use of land for ALL purposes before ever approving a project like Jay Paul's proposed Harbor View. So many of us simply cannot afford to Eat Cake anymore and the prospect of your body of city government approving Harbor View with its demands and lack of benefit to the city other than more but very expensive housing, well, it's frankly disheartening.

Please look to promote diversity of business for the city, and diversity of who can afford to live in Redwood City when you ponder your choices. Please stop approving an agenda that continues to all but force the long term and/or working class people out.

Thank you for your time,  
Kathy L. Segura

[Sent from Yahoo Mail on Android](#)

**Letter 138**     **Kathy Segura**  
**Response**     February 8, 2019

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138-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Matthew Self](#)  
**To:** [GRP-City Council](#)  
**Subject:** Opposed to General Plan Amendment for Harbor View  
**Date:** Monday, February 11, 2019 9:23:11 AM

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I'll keep this short!

I have been a big supporter of development in Downtown Redwood City for the following reasons:

1. The Downtown plan includes a **balance** of office, housing, and retail
2. The development is close to **transit**, so it minimizes traffic
3. There was a **public-led process** to develop the DTPP plan

However, Harbor View has NONE of these things in its favor!

1. Harbor View is **100% office space**
2. It is not near transit -- it will be **100% car-oriented**
3. The project is not part of any publicly-led plan -- it's **developer-led**

I would opposed this project even if it conformed to current land use and zoning. But it is completely inappropriate to change the land use or zoning in order to allow this project where it wouldn't otherwise be allowed.

I ask that you please review the "**significant and unavoidable impacts to transportation**" in detail. The impacts of this land use and zoning change substantially outweigh any benefits to the community.

Respectfully,

--Matthew Self

**Letter 139**     **Matthew Self**  
**Response**     February 11, 2019

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- 139-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Eric Set](#)  
**To:** [GRP-City Council](#)  
**Subject:** Opposition for Harbor View project  
**Date:** Thursday, February 07, 2019 8:31:30 AM

---

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Eric Set  
311 Quay Lane  
Redwood City, CA 94065

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**Letter 140**     **Eric Set**  
**Response**     February 7, 2019

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140-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [donna.silverberg@sbcglobal.net](mailto:donna.silverberg@sbcglobal.net)  
**To:** [GRP-City Council](#)  
**Subject:** Bayfront changes  
**Date:** Thursday, February 07, 2019 9:06:52 AM

---

Please do not approve large business buildings without including housing people can afford for all new workers.  
Thank you  
Donna Silverberg

Sent from my iPhone

**Letter 141**     **Donna Silverberg**  
**Response**     February 7, 2019

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141-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Virginia Smedberg Smedberg](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#); [Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Monday, February 11, 2019 1:38:03 AM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Do any of you drive the local commute routes? Do we need MORE commuters from distant lands?? I think not. And do you really want to be responsible for the damages to buildings that would be gradually drowned? I think not.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Virginia Smedberg Smedberg  
Palo Alto 94301

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**Letter 142**     **Virginia Smedberg**  
**Response**     February 11, 2019

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142-1            The comment noted the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Christy Smith](#)  
**To:** [GRP-City Council](#)  
**Subject:** Please do not continue with the Harbor View project  
**Date:** Thursday, February 07, 2019 8:26:08 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

[Your Name]  
[Your City]

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**Letter 143**      **Christy Smith**  
**Response**      February 7, 2019

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143-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

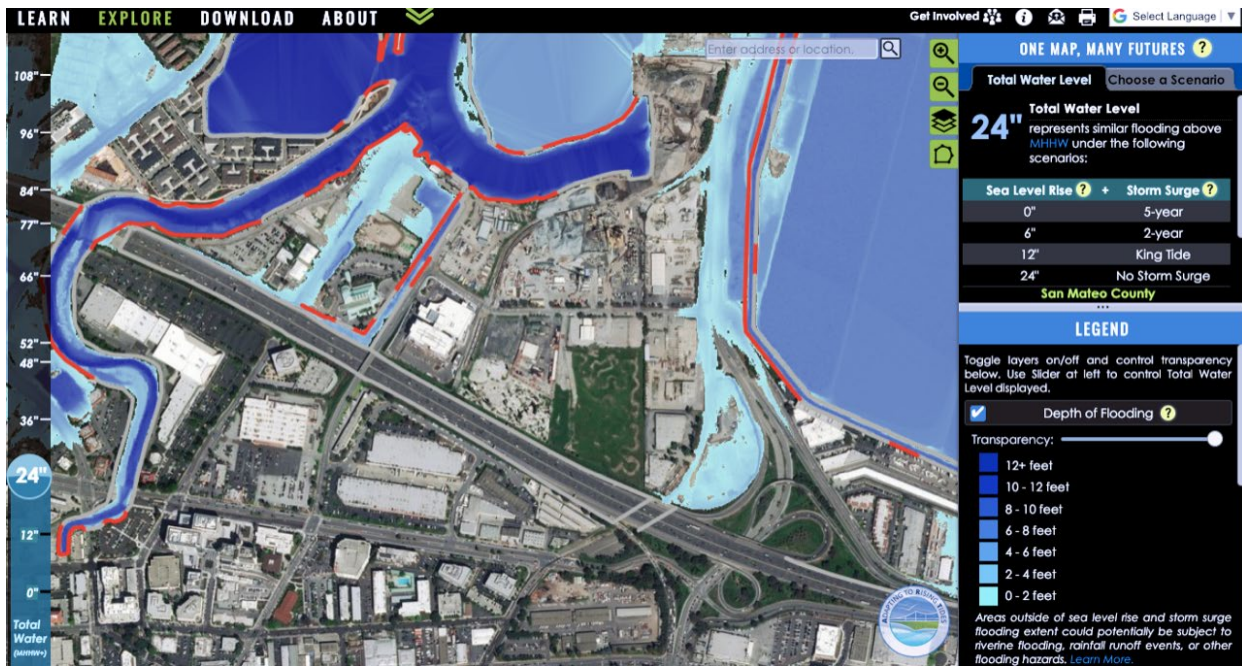
With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

From: [Jeremy Smith](#)  
To: [CD-Steven Turner](#)  
Subject: Harbor View Draft EIR  
Date: Monday, February 11, 2019 9:31:51 PM  
Attachments: [Screen Shot 2019-02-11 at 9.24.12 PM.png](#)

Hello,

I've noticed the projects Draft EIR addresses sea level rise on the property itself, for which mitigation efforts are to raise the BFE. Please consider the impacts of sea level rise to the surrounding transportation network. Mitigation efforts could include increasing flood resilience of surrounding transportation network, allowing for retreat of critical marsh and near-marsh habitat where possible. Noting work done by BCDC through their Adapting to Rising Tides efforts here:

Thank you,  
Jeremy Smith



**Letter 144**     **Jeremy Smith**  
**Response**     February 11, 2019

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144-1            With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.

**From:** [Oscar Smith](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 2:46:52 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Oscar Smith  
Redwood City 94065

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**Letter 145**     **Oscar Smith**  
**Response**     February 8, 2019

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145-1            The comment notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** [Rebecca Smith](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project -- PLEASE DO NOT APPROVE!!!  
**Date:** Thursday, February 07, 2019 10:40:11 AM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Rebecca Smith  
Redwood City

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**Letter 146**     **Rebecca Smith**  
**Response**     February 7, 2019

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146-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Joan Smithline](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Sunday, February 10, 2019 2:26:35 PM

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I am asking you to discontinue your pursuit of more development in RWC's port, specifically the ***Harbor View project***. Our highways are a nightmare, our treasured Bayfront Park and the Baylands would be negatively impacted by a looming tower. The housing crisis with this massive new development would endanger our port, environmentally, not to mention it would be in the path of sea level rise! Changing the General Plan to allow office towers on an industrial site is preposterous!

We already have out of control building across from Bayfront Park, and with the Facebook campus already causing gridlock in the Bay Area especially MP and RWC, it's time to start saying NO to big developers.

Thank you for hearing my pleas.

Joan Smithline

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**Letter 147**     **Joan Smithline**  
**Response**     February 10, 2019

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147-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Jennifer Sneddon](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 4:20:49 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Jennifer Sneddon  
Redwood City 94062

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**Letter 148**     **Jennifer Sneddon**  
**Response**     February 8, 2019

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148-1            This comment notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Scott Sneddon](#)  
**To:** [GRP-City Council](#); [Council-Ian Bain](#); [Council-Diane Howard](#); [Council-Alicia Aguirre](#); [Council-Janet Borgens](#);  
[Council-Giselle Hale](#); [Council-Shelly Masur](#); [Council-Diana Reddy](#)  
**Subject:** Please don't move forward with Harbor View  
**Date:** Friday, February 08, 2019 4:24:52 PM

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Dear Mayor Bain and City Councilmembers,

Please do not continue forward with the review process for the Harbor View project. The Draft EIR has found 20 separate traffic and air quality impacts that are significant and unavoidable even with mitigation measures. In addition, the Harbor View project would add over 4,500 new employees at this site with no additional housing, which would worsen the jobs/housing imbalance by over 2,000 homes. Furthermore, Redwood City should not be locating additional development in areas that are vulnerable to sea level rise until there is a plan in place for how to protect it.

Please do not spend any further staff time or resources on this project, which is wrong for Redwood City. Thank you for your consideration.

Scott Sneddon  
Redwood City 94062

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**Letter 149**     **Scott Sneddon**  
**Response**     February 8, 2019

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149-1            This comments notes the impacts discussed in Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.



**From:** Naida Sperling <[naidasperling@sbcglobal.net](mailto:naidasperling@sbcglobal.net)>  
**Subject:** Please reject the Harbor View Project  
**Date:** February 8, 2019 at 12:34:02 AM PST  
**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. Frankly, traffic is already a nightmare. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Naida Sperling  
Palo Alto

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**Letter 150**     **Nadia Sperling**  
**Response**     February 8, 2019

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150-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Sherry Stack](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project - opinion  
**Date:** Thursday, February 07, 2019 11:33:23 AM

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Dear City Council members,

I understand that you are considering having a massive commercial project put in at Redwood City's port area. I have many concerns about this. We have seen such massive building around Redwood City and adding so many more new employees with so little housing doesn't make sense. There just isn't enough housing.

Further, this location is not close to mass transportation options. The amount of traffic it would increase will be untenable in the Woodside Road area.

The Redwood City Port and its industry is a resource both historical and current that we must keep intact.

I ask, as a citizen of San Mateo County, that you do not continue with this project in the Redwood City Harbor location.

With respect,

Sherry Stack  
Menlo Park, Ca

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**Letter 151**     **Sherry Stack**  
**Response**     February 7, 2019

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151-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project

With respect to the comment related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Georgianne Stephen](#)  
**To:** [GRP-City Council](#)  
**Subject:** Draft EIR - Harbor View Project - Comments  
**Date:** Sunday, February 10, 2019 10:09:30 PM

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Dear Mayor Bain and Redwood City Council Members:

I am writing to give you my thoughts about the use of the land previously occupied by Malibu Grand Prix. First off let me say, as a person who grew up on the Peninsula, I was saddened to see the Malibu Grand Prix facility go. Growing up here in the 1970's and 1980's young people and families were able to go mini-golfing, bowling, and roller and ice skating without putting our parents in the poor house. Even going to the SF Giant's at Candlestick was an affordable family past time. With the closing of the Malibu Family Fun center the Peninsula residents have little if any affordable opportunities for family entertainment.

That being said the one thing for certain that the Peninsula does not need is another high tech office park loading up 101 in Redwood City so that the average speed during commute hours goes from 10 mph to 1 mph. I have lived in Redwood City for thirty years and have seen the downtown go from the aptly named Deadwood City to a thriving, bustling downtown with housing, office buildings and restaurants and shops. For my taste it is sometimes too crowded and I would have thought with that much development approved there would have been some open space added but that is another discussion. My point is that, for the most part, the plan has been effective. There are apartments and high tech offices, Box for example, near public transit and services. That makes sense and I am sure that there are more office buildings proposed under the downtown plan.

The land where Malibu sat is designated for Light Industrial and Industrial Port Related for the most part. This is what it is zoned for and the new owner's knew this when they purchased the land. Based on these facts it is unclear to me why the Council would even be considering the proposal for a massive high tech office complex. The Peninsula is losing light industrial districts by the acre. Just look up and down El Camino and Industrial Boulevard in San Carlos. There are industrial parks being mowed down in favor of hotels which will employ people in low paying jobs and these people can't afford any of the new housing going up in the same areas. I worked in manufacturing in industrial parks along the Peninsula for years but my company moved to Hayward as industrial parks were demolished for high rise offices employing biotech and high tech workers leaving everyone else out in the cold.

Remember the tech bust when these companies took over Burlingame's auto row and left buildings vacant for years until recently. A well rounded economy encompasses all types of employment including office, construction, services, retail, etc. We need to plan for everyone and I think that the intent of the original plan is the correct one.

Use the old Malibu land for light industrial and support of the thriving economy at the Port of Redwood City. We are one of the lucky cities that have such an asset and the area around our Port should be dedicated to serving the needs of the Port and what

may be needed in the future. Once you vote to take that away it is gone for good. The vision of Industrial Port Related zoning as part of the development designation was the right call. Don't reverse a smart decision and replace it with a foolhardy one.

Last but not least I challenge you to actually talk to your constituents and see what they think. Tell them that the plan will result in 8,000 tech workers clogging up 101 and Woodside Road. What do you think they would say? Light industrial areas, like where my company started up, are the type of places that people can afford to start businesses, have their workshops, small businesses and light manufacturing and supply. This is what we need to try and keep a well rounded work force on the Peninsula.

Thank you for your consideration.

Georgianne Stephen  
Redwood City

**Letter 152**      **Georgianna Stephen**  
**Response**      February 10, 2019

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152-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Bruce Storms](#)  
**To:** [CD-Steven Turner](#)  
**Cc:** [GRP-City Council](#)  
**Subject:** Harbor View DEIR comments  
**Date:** Thursday, March 7, 2019 3:47:42 PM

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Dear Mr. Turner,

As a NASA engineer, it is challenging to find time to review such a lengthy document as is the Harbor View Draft EIR. However, I see that the EIR process is often one-sided, so I am hoping that my comments below will provoke additional review and analysis. Thank you for the opportunity to submit additional information for consideration in advance of the deadline at 5p on March 8, 2019.

Regards,

Bruce Storms  
 3618 Highland Ave  
 Redwood City, CA 94062

Comments on Harbor View DEIR:

Impact GEO-1: Per the USGS, the Harbor View site will indeed expose people to significantly amplified earthquakes. The soil type is classified as “E” which is described as “Includes water-saturated mud and artificial fill. The strongest amplification of shaking due is expected for this soil type.” See link below:

153-1

<https://earthquake.usgs.gov/hazards/urban/sfbay/soiltype/>

Impact GHG-2.CU: This project specifies that the new buildings will be LEED Silver and, as such, do not conflict with local policy associated with energy standards. However, a recent peer-reviewed journal article concludes that LEED Silver buildings use as much or more energy as non-certified buildings and that LEED Gold or above is required to show significant energy savings. In light of this analysis, the EIR should be re-evaluated for the resulting environmental impacts. See the link below for the peer-reviewed paper comparing many buildings of various certifications.

153-2

<https://www.sciencedirect.com/science/article/pii/S037877881300529X>

Impact LU-1.CU: This project will have a significant effect on land use and planning because it occupies an area close to the Port of Redwood City. Per the Precise Plan, this land should continue to be zoned Light Industrial in support of the deepest port in the south bay which has experience significant growth in recent years. See link below documenting another record breaking year for our port:

153-3

[https://www.smdailyjournal.com/news/local/record-breaking-year-for-port-of-redwood-city/article\\_8619e6f6-1a19-11e9-aa8a-975c95097a39.html](https://www.smdailyjournal.com/news/local/record-breaking-year-for-port-of-redwood-city/article_8619e6f6-1a19-11e9-aa8a-975c95097a39.html)

Impact POP-1 & POP-1.CU: A office development with as many as 5000 employees will indeed create a demand for more homes in local area. It is unrealistic to think that all workers will commute from outside Redwood City, so this project will aggravate the existing housing shortage and place demands for local housing development (as many as 2000 new homes). Nearby housing development (e.g., on Cargill land) would be within the 100-year flood plane and voter sentiment has already shown that there is public support for preserving bay-front property in it’s natural state. More specifically, over 70% of voters in San Mateo County voted for Measure AA with the desire to restore bay wetlands. In summary, I do not believe that population growth and future housing demands generated by the project are adequately addressed in the EIR.

153-4



Section 4.14 Transportation and Circulation

The EIR identifies numerous traffic impacts as “Significant and Unavoidable” which is definitely true. The intersections near Woodside Rd and Hwy 101 are already saturated, and, even with significant redesign, the area will be irreversibly impacted by an additional traffic associated with roughly 5000 new employees at the Harbor View location. Highway 101 will also be adversely affected with long backups at off ramps and increased traffic. I won’t waste another syllable as I know everybody agrees this is a major issue that deserves careful consideration.

153-5

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**Letter 153**     **Bruce Storms**  
**Response**     **March 7, 2019**

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- 153-1     See Section 4.5, *Geology and Soils*, in the Draft EIR, which addresses existing soil condition and the Project’s requirements with respect to placing structures on the site. As discussed there, since the Project site has soils deemed highly susceptible to liquefaction hazards, a site-specific geotechnical investigation would identify geotechnical design measures to minimize hazards related to such soil conditions and ensure less-than-significance impacts.
- 153-2     As discussed in Section 4.6, *Greenhouse Gas Emissions and Energy*, of the Draft EIR, the Project would be required to comply with all applicable energy-related regulations and building codes. These include the Redwood City Green Building Ordinance and current Title 24 standards that promote energy efficiency. The Project would also construct energy efficient buildings; and use recycled water for approximately 82 percent of its total water usage.
- The Project sponsor has specified that Project will be designed to a LEED silver standard, which according to the US Green Building Council in 2018 would support buildings that consume 25 percent less energy and 11 percent less water than traditional building construction (USGBC, 2018). Overall, the Project would meet all new state energy requirements for both buildings and site design components (Impact GHG-2) and would not exceed a CEQA significance threshold in terms of wasteful energy use (Impact GHG-3); the Project’s energy use would not be wasteful, inefficient and unnecessary. To the extent that the commenter believes that a different standard should be applied, this comment will be noted and made available to applicable decision-makers as they consider the Project. Also see in Chapter 2 of this Final EIR the discussion of *Greenhouse Gases / Climate Change* for the Applicant’s Revised Project, which addresses all energy-related measures and requirements the Project sponsor incorporates into the Project.
- 153-3     The comment opines that the Project has a significant land use impact because it will change land that the City has zoned Light Industrial in support of the nearby Port activities. The proposed zoning change does not, in and of itself, result in a significant impact but instead ensures consistency of the Project with its applicable zone or land use classification. Further, the Project as proposed would be consistent with the General Plan vision for “a Redwood Creek/Harbor Center neighborhood that is a vibrant new area with a strong connection between Downtown and the Bay that attracts new residents, businesses, and visitors to the area,” as detailed in Draft EIR Table 4.9-1. As discussed under *Land Use and Planning* for the Revised Project in Chapter 2 of this Final EIR, like the Draft EIR Project, the Revised Project continues to be a compatible with the mix of

nearby industrial uses, with proposed buildings and parking structures sited to provide some level of buffer between the surrounding heavier uses and the new office campus. The Project does not propose any offsite changes that would prohibit operations or access at the nearby port.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

- 153-4 See Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.
- 153-5 The comment notes the impact determinations in Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that topic. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Bruce Storms](#)  
**To:** [GRP-City Council](#)  
**Subject:** NO on Harbor View  
**Date:** Saturday, February 09, 2019 1:39:30 PM

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Dear Redwood City Council members,

I urge you to vote NO on the approval of the Harbor View project for the following reasons:

1. Port of Redwood City: The Harbor View project would occupy an area currently zoned light industrial (per the Precise Plan). This area should be preserved for its intended purpose in support of the only deep-water port in the south bay. As noted in the article below, the Port has reported record cargo tonnage which indicates the success of ongoing operations. Furthermore, repurposing this light-industrial area near the Port will reduce the resilience of Redwood City's economy should we experience another tech downturn.
2. Housing shortage: The Harbor View project includes over 1 million square feet of office space which corresponds to roughly 5000 new employees and a need for 2000 new homes. This project will further exacerbate the jobs/housing imbalance that we are suffering in Redwood City.
3. Public opinion: In 2016, over 70% of voters in San Mateo County voted for Measure AA with the desire to restore bay wetlands. Additional office development, especially at the Harbor View location, will create pressure for development on neighboring salt flats and other wetland areas.

Please consider these issues in your upcoming votes on the project. Also know that your voting records will be of particular interest to us residents at the time of future elections.

Thank you for your time,

Bruce Storms  
3618 Highland Ave  
Redwood City, CA

Published: 1 February 2018

## Construction boom boosts Redwood City

The US Port of Redwood City has reported a 41% increase in cargo tonnage in the first-half of its 2017-18 fiscal year.

The port handled a record 1,213,042t (metric) in H1 (ending 31 December 2017) of the fiscal year, which runs from 1 July 2017 to 20 June 2018.



Mike Giari, the port's executive director, said the continuing construction boom in Redwood City and Silicon Valley is creating high demand for construction materials shipped to the port, mostly from British Columbia.

The mid-year tonnage of 1.2 Mt is only 600,000t from the port's budget projection of 1.8 Mt for the entire fiscal year. The port authority said it is on track to beat its record tonnage in modern times – 1,833,022t in 2006 and 1,908,172t in 2005.

CEMEX led the banner period, importing 985,528 tons of sand and other construction materials. Other bulk cargo, bauxite and gypsum, totalled 91,700t. Exports by Sims Metal of scrap iron metal totalled 135,800t.

Total vessel calls for the six months reached 79, up from 49 for the same period last year. These included 35 cargo ships, 27 barges, and 17 other vessels.



**Letter 154**     **Bruce Storms**  
**Response**     February 9, 2019

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154-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project

Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Christopher Alan Sturken](#)  
**To:** [GRP-City Council](#)  
**Subject:** Public Comment on Item 7C: the Harbor View Project  
**Date:** Monday, February 11, 2019 8:33:01 AM

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Honorable Mayor and City Council,

My comment is regarding the Harbor View Project Draft Environmental Impact Report (DEIR).

"Appendix F" or the "Transportation and Traffic Detail" of the DEIR suggests several effective Transportation Demand Management (TDM) strategies.

I echo the suggestions of the Complete Streets Advisory Committee made on December 11 which included but were not limited to employer incentive programs, subsidized transit passes, and a commuter shuttle.

How would these strategies be enforced? How would Harbor View affect your commute if these strategies were not implemented?

155-1

Sincerely,

Chris Sturken  
(650) 454-7907  
Pronouns: He/Him/His

**Letter 155**      **Christopher Sturken**  
**Response**      February 11, 2019

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- 155-1      The commenter refers to the TDM strategies and asks about implementation and enforcement. See response to comment 9-2 regarding estimating the amount of vehicle trip reduction associate with a TDM Plan, particularly without knowing the future tenant. For CEQA purposes, trip reductions are based on reasonable and substantiated estimates based on what is proposed rather than speculative future tenant investments. Also, when describing trip reduction goals, it is important to identify what constitutes the baseline. For example, the trip reduction goal may be based on a percentage reduction in vehicle trips based on a rate developed from local surveys of comparable building. The Site TDM Plan proposed for the Applicant's Revised Project (Appendix B to this document) would reduce vehicle trips to achieve at least a 20.7 percent reduction in VMT and associated GHG emissions; see the comparative analyses (*GHG/Climate Change* and *Transportation/Traffic*) in Chapter 2, and see Table 5-2 in Chapter 5 of this document. As required prior to building occupancy, the Site TDM Plan includes a monitoring program to verify vehicle trip reduction is achieved and maintained. However, the actual amount of vehicle trip reduction cannot be known prior to implementation of the Site TDM Plan, and impacts are not reduced to less-than-significant based on its anticipated efficacy.

**From:** [ataborek@aol.com](mailto:ataborek@aol.com)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View Project  
**Date:** Friday, February 08, 2019 5:18:25 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill salt ponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sincerely,

Allison Taborek  
Redwood City, CA 94061



**Letter 156**     **Allison Taborek**  
**Response**     February 8, 2019

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156-1            With respect to the comment related to air quality and traffic impacts, refer to Section 4.4, *Air Quality*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. With respect to the project's employment density, see Master Response 1, and also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

Lastly, to the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Carol Taras](#)  
**To:** [GRP-City Council](#)  
**Subject:** Save the Redwood City Bayfront  
**Date:** Friday, February 08, 2019 5:08:52 PM

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Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

This is another massive commercial office project, in place of industrial, and will add more problems with the zoning change. It is the only Port in the region and will lose a lot of economic and usage diversity that sustains our region.

The development will worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange. The Harbor View site is also in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. The main part of town is getting too large already with multiple offices and housing that take away the charm of the business district.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration

Carol Taras  
San Mateo, CA  
Sierra Club Member

**Letter 157**      **Carol Taras**  
**Response**      February 8, 2019

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157-1              To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Annie Tate](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View project  
**Date:** Thursday, February 07, 2019 12:59:58 PM

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Dear Mayor Bain and City Council members,

I would attend the meeting on 2/11, but I will be out of town on important personal business. Please *do not* continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region -- it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project (out of sync with current land use), will inevitably have a negative domino effect on all the heavy and light industry that supports the Port and makes it viable. It will very likely result in more land speculation, with more land owners request a zoning change to commercial office use. This could kill the only Port in the region and result in a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office north of 101, with 4,500 employees, will put pressure to provide housing on the North side of 101. This could in turn put pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community. That project **MUST NOT** be allowed to resurface. Our US president is willfully blind to the issues of climate change, but we **CANNOT** follow that lead!

Please do not continue forward with this project, -- it's the wrong project in the wrong place.

Thank you for your consideration.

Annie Tate  
Redwood City

**Letter 158**     **Annie Tate**  
**Response**     February 8, 2019

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158-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Francine](#)  
**To:** [GRP-City Council](#)  
**Subject:** Harbor View item on 2/11 Agenda  
**Date:** Sunday, February 10, 2019 9:56:02 PM

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Mayor Bain, Vice Mayor Howard, and Council,

The impacts of Harbor View, as identified in the EIR, are not able to be mitigated.

I do not pretend to understand all the pages of the EIR, but I know that an office park with no link to public transportation, no new infrastructure in RWC for 101 access, no real timeline/funding for the Woodside/101 interchange makes this project not something Redwood City should be approving.

The additional housing demand this will cause, particularly lack of affordable housing is also not able to be mitigated.

Please do not amend our General Plan for this project.

Thank you for your consideration.

Francine and Greg Taylor

**Letter 159**      **Francine Taylor**  
**Response**      February 10, 2019

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159-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment that the lack of housing cannot be mitigated, see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance.

**From:** [Jane Taylor](#)  
**To:** [GRP-City Council](#)  
**Subject:** No on Harbor View Project!!!  
**Date:** Monday, February 11, 2019 1:57:41 PM

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Dear Redwood City City Council members,

I am writing to express my opinion to you that I feel that the Harbor View project is a bad idea for Redwood City. The residents and people that work and visit our city do not deserve to have more gridlock from unmitigated traffic imposed on us, nor more pressure on our already hyper-inflated housing market. Please do not allow the zoning to change. Please do not advance the project forward. Please send Jay Paul back to the drawing board!

Thank you,

...Jane

Jane Taylor  
Cell 650-996-2321

"Life is like riding a bicycle. To keep your balance, you must keep moving!"



**Letter 160**     **Taylor**  
**Response**     February 11, 2019

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160-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Jeanie Treichel](#)  
**To:** [GRP-City Council](#)  
**Cc:** [Jeanie Treichel](#)  
**Subject:** No -- on Harbor View project  
**Date:** Sunday, February 10, 2019 9:28:44 PM

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Dear Mayor Bain and City Council members,

I was raised in Redwood City and my family still lives there. We're talking about 90 years altogether. (I am now in Portola Valley.) We used to be able to see the Bay. We used to be able to go to Pete's and walk along the edge of the marsh. We used to be able to tie up our boats and walk on the marshes. Pete's Harbor could have been a great place for people of Redwood City to be near the waters.

This new project will push Redwood City further inland. Why not be a courageous Council and respect the people in the town and allow them to have a relationship with their environment - instead of bringing in another multi-story project.

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustainThe development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Jeanie Nieri Treichel  
180 Fawn Lane, Portola Valley, CA 94028

Family in Redwood City  
114 Somerset Street, Redwood City, CA 94062

**Letter 161**     **Jeanie Treichel**  
**Response**     February 10, 2019

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161-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** <[terryt1011@aol.com](mailto:terryt1011@aol.com)>

**Subject:** Save our Bayfront in Redwood City

**Date:** February 7, 2019 at 8:32:00 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Members of the Council:

**On Monday, February 11**, you will hold a study session on the Harbor View project -- four 7-story office towers for 4,500 employees on the former Malibu Grand Prix and Lyngso site, north of 101 at Woodside Road. This project would worsen the housing crisis, endanger our regional port and put a massive new development in the path of sea level rise. Please do not continue forward with the approval process.

Terry Trumbull, Lecturer  
Environmental Law and Policy  
Santa Clara and San Jose State Universities

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**Letter 162**     **Terry Trumbull**  
**Response**     February 7, 2019

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162-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use, refer to Section 4.9, *Land Use and Planning*, of the Draft EIR, which provide the analysis related to that environmental topic. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR's consideration of jobs/housing balance.

**From:** [Ron Vane](#)  
**To:** [CD-Steven Turner](#)  
**Subject:** Comments on Harbor View Project in Redwood City.  
**Date:** Monday, March 4, 2019 4:27:02 PM

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## **Comments on Proposed Harbor View Project on Blomquist Street Redwood City**

By Ronald Vane March 4, 2019

Ronald Vane is a 45 year resident and house owner residing at 3124 Wessex Way, Redwood City, CA 94061

Ronald Vane owns a business  
XEI Scientific, 1755 East Bayshore Rd, Suite 17 Redwood City CA 94063  
[www.Evactron.com](http://www.Evactron.com) [RVane@Evactron.com](mailto:RVane@Evactron.com)

He Commutes to work past the Project site via Maple and Bloomquist Street and is very familiar with the existing conditions at the project site.

### **Ronald Vane is against approving the draft EIR and the project for the following reasons:**

- A. Too many employees for this location. No way to transport this many people to work here.
  - a. Woodside road interchange is congested beyond capacity
  - b. Maple Street bridge over 101 is only two lanes without bike lanes and with a narrow walk way on only one side.
  - c. Bloomquist street would need room for 6 lanes of traffic for cars, busses, bicycles, Concrete, paving, and aggregate trucks plus pedestrians lanes to accommodate this many new workers here.
  - d. The freeway and bridges are at capacity.
  - e. The Railroad CalTrain service and shuttle busses cannot handle this much extra load as proposed
  - f. There is not enough local housing.
  - g. Downtown RC would become more congested.
- B. Too many other office towers are being built now on Peninsula. Big risk of “see through” towers like Redwood Shores had in 2003.

- c. Redwood City would lose light industrial space which businesses like mine and my suppliers need. Manufacturing pays sales taxes.
- d. Offices do not usually pay enough sales taxes to pay for the additional services.

**In Conclusion I say just say NO!**

**Ronald Vane**

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**Letter 163**     **Ron Vane**  
**Response**     March 4, 2019

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163-1            To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these topics.



**From:** Sandra Wallace <[insight.sandra@gmail.com](mailto:insight.sandra@gmail.com)>

**Subject:** Harbor View Project

**Date:** February 7, 2019 at 8:36:48 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and City Council members,

As a voting resident of Redwood City for many years, I have enjoyed the Port of Redwood City and the surrounding Baylands. I am not able to attend this meeting as I am recuperating from surgery. I strongly object to the massive scale of this project. Please do not continue forward with the review process for the massive Harbor View project. Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accommodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region. Expansion in this area should be modest and support the industrial businesses. The environmental impact of this project also concerns me. Water levels are rising due to global warming. We shouldn't be doing major construction on the waterfront. The Harbor View site is directly in the path of the sea level rise. Redwood City should not be developing property in a flood zone with no plan to protect it.

The traffic congestion on Highway 101, particularly at the Woodside Road interchange, is already very seriously impacted. The additional car traffic for this project would create permanent gridlock. This area also does have not public transit options to support this project.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Sandra Wallace  
Redwood City

***Sandra Wallace***

Insight Memory Care Choices

Cell: 650 208-8809

Fax: 510 764-2436

E-mail: [insight.sandra@gmail.com](mailto:insight.sandra@gmail.com)

[www.InsightMemoryCareChoices.com](http://www.InsightMemoryCareChoices.com)

**Letter 164**     **Sandra Wallace**  
**Response**     February 7, 2019

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164-1            With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** Janet Walworth <[walworthjanet@gmail.com](mailto:walworthjanet@gmail.com)>

**Subject:** Harbor View

**Date:** February 7, 2019 at 9:11:31 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and City Council Members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area to accommodate a massive commercial office project, in place of industrial uses, will inevitably have a negative domino effect on all the heavy and light industries that support the Port and make it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

This development would significantly worsen congestion on Highway 101, particularly at the Woodside Road interchange, which is very severely impacted already.

In addition, the Harbor View site is in the path of projected sea level rise. Redwood City should not be approving further developments on the flood zone with no plan for how to protect it.

An additional concern is that of the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure to provide housing on the north side of 101. This creates pressure to develop the old Cargill saltponds, a project that has divided the Redwood City community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration of the above.

Sincerely,

Janet Walworth  
Palo Alto

Sent from my iPhone

**Letter 165**     **Janet Walworth**  
**Response**     February 7, 2019

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165-1            With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** [Dawn M. Ward](#)  
**To:** [GRP-City Council](#)  
**Subject:** NO on Harbor View Project  
**Date:** Thursday, February 07, 2019 9:41:39 AM

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Dear Mayor Bain and City Council:

I am writing to express my opposition to the proposed development on the old Malibu Grand Prix site and surrounding area.

As a resident of Redwood City for nearly 15 years, I have witnessed the extreme overdevelopment of downtown and the very negative impact it has had on both the traffic and housing crisis. It is also frustrating that the City did not secure benefits from the developers that would have helped our low income residents and provided additional funding for our schools.

This proposed Harbor View development would not only greatly exacerbate the existing and escalating problems of overcrowding, traffic, and housing, it would impact our open spaces. This is absolutely not appropriate -- we need to preserve the open spaces we have left, especially given what has gone on in the rest of the city.

Please deny any application to proceed with the Harbor View Project.

Thank you.

Dawn M. Ward, CFLS  
Attorney at Law  
303 Twin Dolphin Drive, Suite 600  
Redwood City, CA 94065  
(650)473-0227  
(650)618-1447 - fax

**Letter 166**      **Dawn Ward**  
**Response**      February 7, 2019

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166-1              With respect to the related to traffic, refer to Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to that environmental impact topic. Also see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

**From:** Ann Willard <[annwillard1@comcast.net](mailto:annwillard1@comcast.net)>

**Subject:** Harbor View Project

**Date:** February 7, 2019 at 9:06:27 PM PST

**To:** [council@redwoodcity.org](mailto:council@redwoodcity.org)

Dear Mayor Bain and City Council members,

Please do not continue forward with the review process for the massive Harbor View project.

Redwood City's Port is a regional asset that is critical for our region and it is supported by the heavy and light industrial companies around it.

Changing the zoning of this area, to accomodate a massive commercial office project, in place of industrial, will inevitably have a negative domino affect on all the heavy and light industry that supports the Port and makes it viable. It will result in more land speculation as more land owners request a zoning change to commercial office resulting in killing the only Port in the region and a loss of economic diversity that sustains our region.

The development will significantly worsen traffic congestion on Highway 101, particularly at the Woodside Road interchange, which is already very seriously impacted. In addition, the Harbor View site is in the path of sea level rise. Redwood City should not be approving further development in the flood zone with no plan for how to protect it.

An additional concern is the jobs-housing imbalance. Building a massive commercial office, with 4,500 employees, north of 101, will put pressure on providing housing on the North side of 101. This puts pressure on developing in the old Cargill saltponds, a project that has divided the Redwood City Community.

Please do not continue forward with this project, which is the wrong project in the wrong place.

Thank you for your consideration.

Ann Willard  
Portola Valley, CA



**Letter 167**     **Ann Willard**  
**Response**     February 7, 2019

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167-1            With respect to the comment related to land use and traffic, refer to both Section 4.9, *Land Use and Planning*, and Section 4.14, *Transportation and Traffic*, of the Draft EIR, which provide the analysis related to these environmental impact topics. With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR. Also see Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing balance.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

# CHAPTER 7

## Responses to Comments Received at the Public Hearing on the Draft EIR

This chapter presents the comments made at the public hearing on the Draft EIR, with the responses to each speaker’s comments immediately following each comment. The public hearing was held at the February 11, 2019 meeting of the City Council of Redwood City. The comments (designated in this chapter as “PH-#”) are shown verbatim, excerpted from the public hearing transcript and in the order that they occurred. The focus of each comment is shown in **bold text** for ease of review. **Table 7-1** below lists all speakers.

In addition to comments received during the public hearing segment of the meeting, City Council members’ comments and questions made after the Council’s close of the public comment period and that pertain to the Draft EIR are also presented and responded to in this chapter (designated in this chapter as “CC-#). Where City staff responded to City Council members’ questions during the meeting, those responses are shown in *bold italic text* for clarity.

**TABLE 7-1  
PUBLIC SPEAKERS ON THE HARBOR VIEW PROJECT DRAFT EIR**

Comment #	Entity	Commenter
<b>Individual Commenters at the City Council Public Hearing on the Draft EIR – February 11, 2019</b>		
PH-1		Lee Callister
PH-2 and PH-3		Jim Gernand
PH-4		Carol Cross
PH-5 and PH-6		Jimmy Hedges
PH-7		Sister Christina
PH-8 thru PH-11		Bob Wilson
PH-12 thru PH-15	Sierra Club Sustainable Land Use Committee	Gita Dev
PH-16 thru PH-18		Jim Burke
PH-19 thru PH-21		Marilee Robinson
PH-22 thru PH-24		Annaloi Nickum
PH-25 thru PH-27		Forrest King Elliott
PH-28		Forrest King Elliott

**TABLE 7-1  
PUBLIC SPEAKERS ON THE HARBOR VIEW PROJECT DRAFT EIR**

<b>Comment #</b>	<b>Entity</b>	<b>Commenter</b>
PH-29		Michael Pierce
PH-30		Dan Ponti
PH-31 thru PH-34		Kris Johnson
PH-35 thru PH-38	Redwood City Neighborhood United	Gail Rabe
PH-39 and PH-40	Committee for Green Foothills	Alice Coffman
<b>City Council Member Commenters at its Public Hearing on the Draft EIR – February 11, 2019</b>		
CC-1 thru CC-3		Vice Mayor Howard
CC-2 thru CC-9		Councilmember Borgens *
CC-10 thru CC-21		Councilmember Masur *
CC-22 thru CC-34		Councilmember Hale
CC-34 thru CC-38		Mayor Bain *

\*Prior tenure.

## 7.1 Responses to Comments Received at the Public Hearing on the Draft EIR

### Lee Callister

PH-1: Good evening, Mayor Bain, Councilmembers and members of the public. I have put my thoughts down on paper and I don't really think it's necessary for me to go through them again tonight. Lots of other people have additional things to say. What I do want to focus on, however, is one issue that is – that I think is important and I haven't really seen much attention paid to it thus far.

As a lot of you know, I have lived for the last few years down at Docketown, which means that I've gone up and down Blomquist on an almost a daily basis. And one thing that has always stood out to me because I'm always confronted with it is that **there's about six entrances to the Graniterock property off that road that are constantly [unintelligible] and continually filled up with big trucks, dust, dirt, slowing down traffic, people waiting to get in, people waiting to go around, big loads of aggregates and concrete. It's a very difficult situation. Now obviously, if this project were to go forward that wouldn't remain, it would have to be moved, but that's the point. Where does these new entrances go?** My good friend Adam Alberte was quoted in a recent San Mateo Journal article saying it would have -- that this project would have no real impact on businesses on down the road. Well, excuse me, you're going to have to move the entrances -- all those entrances, all that traffic is going to have to move around right over on Seaport or intrude into that office park, perhaps impact Ferrari Pond's property. Yes, **it most certainly is going to have an impact on all of those businesses all the way down to the end of it of the road**, all of the office parks, the port, the companies that are already there, the companies that are projected will be impacted if this project goes through. **They're being impacted in terms of the air quality, they'll be impacted in terms of the dust and the dirt**, and it's going to be the big mess that's currently on Blomquist is now going to be on Seaport. Thank you very much.

**RESPONSE TO COMMENT PH-1:** As responded to in Response to Comment 7-2 in Chapter 6 of this document, with respect to the Project's potential to create hazards concerning site access, the Draft EIR considered site access and circulation related to construction and operation under Impact TRANS-16, and Impact TRANS-30. Figure 4.14-9 in the Draft EIR shows the proposed site plan with recommendations to improve site circulation. These circulation recommendations were based on a review of the proposed site plan in context of the surrounding area, including the existing Graniterock operations and existing driveways along Blomquist Street. A traffic simulation of the proposed site driveways was prepared and resulted in no additional recommendations to the site plan beyond those identified in Figure 4.14-9. Access to existing driveways along Blomquist Street would be maintained with implementation of the Proposed Project. Regarding dust / dirt impacts to nearby businesses, the analysis is presented under Impact AIR-1, and Mitigation Measures AIR-1A and AIR-1B

are identified to address the impacts to nearby uses and facilities, including those within the port corridor, to less than significant.

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### **Jim Gernand (Also written letter #69 in Chapter 6)**

PH-2: Dear Mayor Bain and Councilmembers, I'm -- tonight I'm commenting on the General Plan Amendment this project requires. My name's Jim Gernand and I'm a resident of Redwood City and I actively participated in the 2010 General Plan update process, and in that update process made clear that **our community desires a robust and mixed economy**. And a mixed economy includes light industrial uses. The kinds of jobs provided by the Port of Redwood City and its supporting industries are a key part of that effort to broaden Redwood City's economic base and provide economic resiliency, as these provide jobs for all skill and education levels, that's an essential component in addressing our housing affordability crisis. Light industrial businesses provide well-paying jobs that do not require a 4-year degree and it is exactly these kinds of jobs that are necessary to create a shared prosperity economy. Currently light industrial businesses are under enormous pressure in the Bay Area in part due to displacement and conversion of existing light industrial districts into new office projects such as this one proposed by the Jay Paul Company. The Redwood City General Plan established policies and programs expressly intended to preserve and expand the Port of Redwood City and its supporting businesses, and at the same time to focus the development of new office space in the downtown so they will be close to housing and public transit. **The Jay Paul Company purchased the site as currently zoned with the intent to develop the site in direct contradiction to the City's General Plan.**

So this is not an as of right issue, **this is a zoning busting project proposed for a site that is identified in the General Plan as an ideal location for industrial uses.**

Changing the General Plan and zoning within our current light industrial corridor will almost certainly generate further land speculation for similar projects in other light industrial areas.

**RESPONSE TO COMMENT PH-2:** This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. See Master Response 4 in Chapter 5 of this Final EIR, which explains how these types of comments are acknowledged in this document. All comments will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and zoning, refer to Section 4.9, *Land Use and Planning*, which presents the analysis related to this impact topic.

PH-3: **Eroding the availability of light industrial land in Redwood City is a negative impact to the long-term economic resilience that is provided by a mixed economy.**

There already is a significant amount of similar development proposals in the pipeline that conform to current zoning that do not require General Plan amendments, so there is no compelling reason why the City should be investing time and resources pursuing a non-conforming developer proposal. So **I urge the City Council to exercise its right to decide now if this project should even be considered and deny the request to allow the General Plan amendment process to go forward.** Thank you.

**RESPONSE TO COMMENT PH-3:** This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. Therefore, see Master Response 4 in Chapter 5 of this Final EIR. All comments will be noted and made available to applicable decision-makers as they consider the Project.

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### **Carol Cross (also written letter #43 in Chapter 6)**

PH-4: Hi. Thank you. You now I was going to – First I want to express my sympathy for the Council because I know that your budget is being hammered by your [unintelligible] obligations. I’ve attended enough board meetings to know that. And I’m sorry because I know that this kind of project would bring in a lot of tax revenue, and that’s an important consideration.

I was going to mention the traffic. 4,500 jobs, let’s say all of those people carpool, that would still be what 2,250 something like that **extra cars on Whipple, Woodside and 101** every single morning and every single – and all of us who have traveled in on those corridors know that it’s already a nightmare during traffic time.

I was also going to say the pressure on housing, but you know, as I was listening to Ms. Brown and her – and her report and it was thorough and good and I appreciate it, I realized that the talk is about what the project -- how the project would impact the environment, but what it’s missing is how the environment is going to impact that project. I’ve looked at [unintelligible] maps of **projected sea level rise. We’re in big trouble and that area is going to be inundated in just really basically a few short years. We are going to either have to provide extensive or intense mitigation to keep the water out, and I don’t think in the long run it’s going to be possible, so I think that it’s just really folly to build something this beautiful and big in a place that will be under the water in 20 or 25 more years.** So I would urge you not to change your **General Plan** and to keep that light industrial. Thank you.

**RESPONSE TO COMMENT PH-4:** Regarding the comment that applies to congestion related impacts and overall trip volumes, there are numerous impacts addressed under Section 4.14, *Transportation and Traffic*, that address congestion under Criterion b related impacts, and to address those impacts, appropriate mitigation measures are identified where feasible. See response to comment 10-6 that addresses necessary clarifications and updates to certain

mitigation measures addressing the roadways cited by the comment. Also see Master Response 1 in Chapter 5, *Master Responses*, of this Final EIR that describes the transition to VMT instead vehicle delay and LOS to determine environmental impacts for transportation.

Regarding the comment concerning sea level rise, see Master Response 2 in Chapter 5 of this Final EIR.

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## Jimmy Hedges

PH-5: I think this is the first me speaking twice in one night. Generally speaking, I'm against the project, and part of the reason being **Maple Street overpass and Blomquist is not going to be able to handle the traffic**. If you've been down to Maple going over to the police department at 7:00 in the morning, there's backed up traffic as far as you can see.

Second, as we've had happen, we build apartments or homes at Pete's Harbor. After they all sold people decided that they didn't like the airplanes, and that should never have been even considered by anybody to make them deviate their flight plan. Now I get ones coming in from the west flying over my neighborhood because they can't fly out far enough to come into the airport normally. With Graniterock out there, and I'm assuming it's going to stay, **you're going to have a dust problem and anybody working or buying those properties are going to be raising hell about the dust**. As you know, the wind blows there pretty good.

**RESPONSE TO COMMENT PH-5:** Regarding the capacity of the Maple Street overpass and Blomquist to be able to handle future traffic associated with the Project, the analysis of traffic congestion in Section 4.14, *Transportation and Traffic*, under Criterion b, conducts a thorough analysis of those impacts and identifies appropriate mitigation measures, where feasible and necessary.

The comment also alludes to land use compatibility issues and experiences where non-industrial uses (namely residential / mixed use) were introduced to such an area resulting in complaints from the newly-introduces users. The compatibility of uses is evaluated in Impact LU-2. Regarding comments raised about a potential dust problem for properties close to Graniterock, the analysis is presented under Impact AIR-1, and Mitigation Measures AIR-1A and AIR-1B are identified to reduce the impacts to nearby uses and facilities, including those within the port corridor, to less than significant.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-6: The other thing, **notice of preparation, I don't know how we're supposed to receive those.** I've never seen anything in any newsletter from the City about planned projects or hearings on projects. **It seems like it never shows up until we're here, but I don't think we can handle the traffic;** it's bad enough the way it is. That's my reasons for objecting to it. Thank you.

**RESPONSE TO COMMENT PH-6:** With respect to the City's circulation of the Notice of Preparation (NOP), Section 1.4, *NOP and EIR Scoping* of the Draft EIR provides details to the steps taken to solicit public comment. The comment addresses the Project's effect on existing traffic conditions, but offers no specific issue. There are numerous impacts addressed under Section 4.14, *Transportation and Traffic*, that address congestion under Criterion b related impacts. To address those impacts, appropriate mitigation measures are identified where feasible.

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## Sister Christina

PH-7: Good evening, Mr. Mayor, Vice Mayor and members of the Council. My name is Sister Christina and it is my privilege to be the executive director of the St. Francis Center. I'm here this evening because I'm driven by our mission to serve the economically poor. One significant piece of that mission, especially in the face of rents that have become exorbitant, is to find, build, rehab, create and scrounge for every possible unit of housing that will provide safe, dignified and clean spaces for our families. Here in one of the most affluent communities in America, we find more and more families struggling with the burden of poverty. The St. Francis Center delivers food, clothing and other basic services to thousands of individuals in Redwood City and Menlo Park and has for 33 years. With the approval of this project \$12 million will come to the Center and I can easily guarantee that every penny would be stretched and used for housing. In the last three years the St. Francis Center has added 93 units of housing. Jay Paul Corporation already assisted with the purchase of 48 of those units. The St. Francis Center has in the pipeline a possibility for 51 more desperately needed units in Redwood City that would be forever designated for lower income families. I don't need to tell you the need is critical.

There is not one work that we do at the St. Francis Center that is not directly related to the challenge of housing and its costs. The struggles that housing insecurity cause are traumatic and perverse and devastate families and communities, especially the least economically able among us. That is why the St. Francis Center has embarked on providing affordable housing. This is not something we do lightly. It is an ambitious effort and requires a great deal of energy and resources, but the need is too great and impact of our housing crisis too big to ignore. We are here tonight because we know that these complex projects bring many challenges and there is need to work together to balance and mitigate those challenges. We need to balance impacts with benefits. We are happy to be here tonight to be part of that balancing. **We do not have any technical comments about the EIR, but we're here to say that Jay Paul has committed to**



**partner with us as a term of their development agreement.** After the Jay Paul team met with us and learned about our efforts and our needs they put forward a conditional promise of \$12 million for the mission of housing. Thank you.

**RESPONSE TO COMMENT PH-7:** This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. Refer to Master Response 4 in Chapter 5 of the Final EIR, which explains how these types of comments are acknowledged in this document. All comments will be noted and made available to applicable decision-makers as they consider the Project. No additional analysis or response is required.

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## Bob Wilson

PH-8: Thank you. You know, sometimes in adversity something good can happen. We have an example happening right now as a result of the **loss of our beloved Ampex sign** this summer. There's a group working on a way of mitigating that problem. I thank Councilwoman Borgens for leading that.

**RESPONSE TO COMMENT PH-8:** The comment does not pertain to environmental issues in the Draft EIR. Refer to Master Response 4 in Chapter 5 of the Final EIR, which explains how these types of comments are acknowledged in this document. No additional analysis or response is required. However, all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-9: I sent you a letter earlier today which provides much more detailed analysis on this project, and **there are three major shortcomings** that are deeply flawed in that – that make this draft deeply flawed. I'll comment on those in a moment,

**RESPONSE TO COMMENT PH-9:** The comment introduces three topics about the analysis in the Draft EIR, which are discussed in PH-11.

PH-10: [b]ut first I'd like to offer a bold **new initiative to address our massive infrastructure deficit, which I call the Sequoia plan.** The Sequoia plan enlists the private sector and harnesses the talent we have locally to address our massive deficit in infrastructure. As Sister just mentioned, housing is at the top. The Sequoia plan has five steps. First, stop the Harbor View EIR review now. Hit the pause button on any further office development projects that require your approval. Third, create a focus taskforce of residents and businesses to provide creative solutions and deliver creative funding plans to address our critical infrastructure deficit. Four, invite other peninsula cities and counties to participate in pausing office development until these solutions are both agreed to, then funded and realistic execution plans are in place, and then move fast to implement the solutions recommended by the Sequoia plan taskforce. We have an

infrastructure crisis now; it's getting worse. We have the people. We have the resources within a 30-mile area of these chambers those resources exist to address these urgent needs, but we need your leadership to help that action to start today.

**RESPONSE TO COMMENT PH-10:** The comment does not pertain to environmental issues in the Draft EIR. Refer to Master Response 4 in Chapter 5 of the Final EIR, which explains how these types of comments are acknowledged in this document. No additional analysis or response is required, however all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-11: Now on to the report. Jay Paul have issued a misleading report full of errors. Even so, it identifies many issues that have significant and unavoidable negative impacts in our community. Some were identified tonight. It's a huge report; however, it can't paper over the detrimental and material adverse impacts on our community. Based on the conclusions in the report as issued, they **identified major problems that cannot be mitigated, you should stop further consideration of this project now.** However, I'll focus on three areas where the report is flat out wrong. **First, the number of workers are severely understated. Second, there really is no housing plan. And third, the trends of data that's used in this report, 12 years old.**

Jay Paul would have you believe that the project will host 4,500 workers. They use 250 square feet per person to come to that number. Facebook just down the road in their Menlo Park headquarters published a report saying 153 square feet per person. Other Bay Area companies are now at less than 100 square feet per person. **So the workers and support people hosted on this site won't be 4,500, there will be over 8,000. They could approach over 16,000 or 17,000.** The rest of it's in my report. Thank you.

**RESPONSE TO COMMENT PH-11:** The comment acknowledges significant and unavoidable impacts identified in the Draft EIR. Regarding the comments on employment numbers and housing, refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project's employment density, as well as Master Response 3, which addresses the Draft EIR's consideration of jobs/housing.

To the extent this comment conveys the opinion as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR, which explains how these types of comments are acknowledged in this document. All comments will be noted and made available to applicable decision-makers as they consider the Project.

**Gita Dev (Sierra Club Sustainable Land Use Committee; also written letter #16 in Chapter 6)**

PH-12: Good evening, Mayor Bain and Councilmembers. I'm Gita Dev and am here representing the Sierra Club Sustainable Land Use Committee. The Sierra Club has been very supportive of Redwood City's development plans, specifically in the downtown area of El Camino and along Broadway. **We're very concerned about a very large commercial development on the other side of 101 for a variety of reasons. One is obviously that it is not close to transit and will not be supportive of the robustness that we need to develop in our transit systems** which are focused around downtown.

**RESPONSE TO COMMENT PH-12:** This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. Refer to Master Response 4 in Chapter 5 of the Final EIR, which explains how these types of comments are acknowledged in this document. No additional analysis or response is required. However, all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-13: We're also concerned about the fact that putting a large office development brings on **pressure to provide housing to support it. The jobs housing balance** has been brought up and **that is a concern of ours, particularly since as in other cities we have seen that once the office goes in there is a tendency to ask for housing near the office, and that would put pressure on putting housing on the other side of 101.** We've all remembered the battles over the **Cargill salt ponds** and we are not looking forward to going into that again. While we do hear rumblings of that coming up alive again in Washington, and therefore this project is of great concern because it plays into that whole scenario which we have just been through in North Bayshore in Mountain View. Some people have said the Council is dead set against development in the Cargill salt ponds. I'm here to tell you councils can change and that could become an issue again. I also – that's one set of issues.

**RESPONSE TO COMMENT PH- 13:** Refer to Master Response 3 in Chapter 5 of this Final EIR, which addresses the Project's consideration of jobs/housing. No additional analysis or response is required.

PH-14: I would very much like to agree with the gentleman who just spoke before me that the count of the employees is vastly understated. Their count of 3.5 persons per 1,000 square feet comes to 270 square feet per employee, which is very, very high for today's tech jobs. And therefore, in fact, the **population is of employees could be double**, and that would double the traffic, double the mitigation, double all the environmental impacts.

**RESPONSE TO COMMENT PH-14:** Regarding the comments on employment numbers and housing, refer to Master Response 1 in Chapter 5 of this Final EIR,

which addresses the Project's employment density, as well as Master Response 3, which addresses the Draft EIR's consideration of jobs/housing.

PH-15: For these reasons I would say that the environmental impacts are much more serious than are even articulated in the Environmental Impact Report. These are some of the reasons why we would really ask the Council to consider whether this is really a project that we should be aggressively pursuing to make it happen or whether we should actually be saying we should take a step back here and stay with the General Plan the way it is. Thank you.

**RESPONSE TO COMMENT PH- 15:** The comment opines on the adequacy of certain analyses in the Draft EIR, as raised in comments PH-12 through PH-14.

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## Jim Burke

PH-16: Thank you, Mayor Bain and Councilmembers. It's a pleasure to speak here. My wife Catherine and I have been living in San Carlos for 13 years and now in Redwood City for 13 years, where we've raised our families. We've been very impressed with the job that the City Council in Redwood City has been doing for many years. And that's one of the reasons why we would encourage you to not allow this amendment to go forth, because the planning has been done. As Jim Gernand mentioned before, we have a perfectly good General Counsel – **General Plan update process, perfectly good downtown precise plan process** that took into account a broad support – broad input from a number of people, number of groups, and went through the long-term impacts and they balanced their approach. So why don't we just follow that plan? **Why are we thinking about allowing an amendment** for an opportunistic land developer to come in and build something out in the boonies of 101 instead of building where wise corporations build like Box in the center next to transportation we already have. They're putting a tremendous burden on our area. **The area is zoned for light industrial business use**, and as Jim said, that is a unique type of component of our society here. It was determined in the General Plan that we want that balance in our community. And what this project is talking about is changing the nature of our community. We would like it to go through the general process and for people to agree upon what our community should look like instead of granting de

**RESPONSE TO COMMENT PH- 16:** This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. See Master Response 4 in Chapter 5 of this Final EIR, which explains how these types of comments are acknowledged in this document. No additional analysis or response is required, however all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-17: It's about **opportunity cost** as well. I think the EIR did not look at the opportunity cost of what will be there if it continues as it is, and those are all the **small businesses** that we love to patronize. We love to go around – if you're doing a remodel like we did in the last year, these are all those wonderful small business we can go to here in our own community. Are we going to go visit the business down there? The other thing I'd say is I worked for 9 years at Cisco and Cisco developed along Tasman corridor and at nighttime, on weekends, there's nothing there. I don't understand why we'd be allowing someone to follow that old model.

**RESPONSE TO COMMENT PH- 17:** Opportunity costs is not a topic that pertains to CEQA and conveys the opinion of the commenter as to how the Project should or should not be developed. See Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required, however, all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-18: I thank you, I urge City Council to exercise its right to decide to reinforce the extensive planning process that brings the best, the wisest decisions and to **deny the request of the Jay Paul Company for an amendment to the General Plan**. Thank you very much, Mayor and Councilmembers.

**RESPONSE TO COMMENT PH- 18:** The comment conveys the opinion of the commenter as to how the Project should or should not be developed and therefore does not pertain to environmental issues. See Master Response 4 in Chapter 5 of this Final EIR, which explains how these types of comments are acknowledged in this document. No additional analysis or response is required. However, all comments will be noted and made available to applicable decision-makers as they consider the Project.

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## Marilee Robinson

PH-19: Hi. My name's Marilee Robinson and welcome to the new year and new election because I haven't been here since the election, so welcome, and welcome and good job the rest of you. So here we are with our elections and we're looking at the same project and we kind of have some people that were elected by the people to consider the pause that we've been -- the citizens have been waiting for, and here we are trying to change the General Plan. When Jay Paul Corporation bought these properties **they knew that it didn't fit into the General Plan**, so here they want special privileges to develop and...

**RESPONSE TO COMMENT PH- 19:** The comment does not pertain to environmental issues. See Master Response 4 in Chapter 5 of this Final EIR, which explains how these types of comments are acknowledged in this document. All comments will be noted and made available to applicable decision-makers as they consider the Project.

With respect to the comment related to land use and zoning, refer to Section 4.9, *Land Use and Planning*, which provides the analysis related to this impact topic.

PH-20: In my opinion, **not in a very good location climate change sea level rise**. I have spoken here about me being the Lorax and I speak for the trees, but I also speak for the wetlands. This is not only about traffic; this is about housing.

**RESPONSE TO COMMENT PH-20:** With respect to the comment related to floodplain and sea level rise, refer to Master Response 2 in Chapter 5 of this Final EIR.

PH 21: We already have a **shortage of affordable housing** in all terms of affordable and we're adding, **even if these numbers are correct, 6,000 people. There's no housing in this project**. That's a problem. I know you guys are up to date in looking at our housing shortage. Maybe while Jay Paul Corporation comes back with a project within the parameters of the General Plan, they can loan out the property for tiny homes for our homeless so Sister Christina can do some actual work in the future. And I do appreciate your article and what you do for our community and I do appreciate what you guys do for our community, and I know it's time for that pause and reconsideration in stopping the developers ruling our town. Thank you.

**RESPONSE TO COMMENT PH-21:** Refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project's employment density, as well as Master Response 3, which addresses the Draft EIR's consideration of jobs/housing. Moreover, since the closer of the public review period for the Draft EIR, the Project Applicant has committed to provide St/ Francis Center with 64 units for low income households and will pay the City's required affordable housing fee of \$13.5 million.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR about how these types of comments are acknowledged in this document. All comments will be noted and made available to applicable decision-makers as they consider the Project.

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## Annaloi Nickum

PH-22: I think everybody who spoke so far has pretty much expressed my concerns. This is my first Council meeting and I've lived in Redwood City just 3 years, and even in that short time **I have seen a lot of changes that have disturbed me and that I think are undermining the character of Redwood City. And I do think there is an**

**overbuilding**, there's a **massive development that I think it's been approved on the corner of Woodside and Broadway**. I assume that it's already been approved. That's taking a small shopping center and putting huge amounts of housing and retail. When I first heard of that project I thought oh my God **the traffic impact is going to be enormous just from that project on the Woodside Road corridor**.

**RESPONSE TO COMMENT PH-22:** The potential combined traffic effects of current known projects and the proposed Project on the Woodside Road Corridor are analyzed in the analysis in Section 4.14, *Transportation and Traffic*, in the Draft EIR, with mitigation measures identified where feasible.

PH-23: And I just heard about this project, so I don't know **how to get in the communication chain here**, so maybe somebody can tell me. But I saw it on the Redwood City Post. Someone told me about this meeting tonight.

**RESPONSE TO COMMENT PH-23:** With respect to the City's circulation of the Notice of Preparation (NOP), Section 1.4, *NOP and EIR Scoping* of the Draft EIR provides details to the steps taken to solicit public comment.

PH-24: I saw some pictures of the project and I thought oh my God this is just wrong; this is just not right for – it's just not good. Land use, **changing a General Plan is always problematic and opens the door for other General Plan requests**. The **traffic's** been talked about, the **housing imbalance** is talked about, and I'm going to read the EIR and I'm going to be looking most closely at the environmental impacts to see if they've really been closely looked at. It seems like just in the presentation they were a little bit underplayed, so I'd like to take a closer look than that. So, once again, I think this is a good point to pause, as people have suggested, and **not let this project go forward with the General Plan change**. Thank you.

**RESPONSE TO COMMENT PH-24:** See Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project's employment density, and Master Response 3, which addresses the Draft EIR's consideration of jobs/housing; see Response to Comment PH-22 regarding traffic.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

## Forrest King Elliott

PH-25: Good evening, Mayor, Vice Mayor, Councilmembers. It's Forrest King Elliott; I wish it was Forrest Kong, I'd probably be a little bit bigger and I'd just take over that development because I could. Last time I saw you folks was actually in opposition to the Stanford Hospital expansion and we all know how that ended up, but it is what it is. Councilmember Borgens, I want to take a moment and thank you for representing Friendly Acres, my home district, because we've always been a proverbial redheaded step child and you keep us in the family tree. Thank you.

Getting back to numbers, these numbers are derived from the Friday daily news, so I hope they're correct as in print. I like to think that things in print are still good no matter what the people in Washington DC say. We got 1.2 million square feet, average cost of 50 to 70 dollars per square foot. Let's say that's 60 to 84 million dollars they're putting out for the development. They're offering 50 million...plus 50 million in mitigation, mitigation they have to do because they want to make the development. They're offering 12.5 million to St. Francis Society, which is an excellent society, but **what's Council's idea of affordable housing.** Current average right now would be about 10 homes or maybe let's say 24 condos, not a lot. They're offering 24.5 million dollars in traffic improvements. Who benefits? I believe the [Jay] Paul development company does because it increases access to their property, doesn't help your average citizen, most people in this room. Twenty-three million dollars for shuttle benefits to a determined time. Again, it's self-serving, offers access for his employees to get to his -- or the employees of his [unintelligible] his property. Twenty-nine million dollar refund of the Blomquist Ridge extension, again benefits his interests, it increases value and access to his property and does not benefit the average citizen. Tax break for him, nothing for Redwood City.

**RESPONSE TO COMMENT PH-25:** The comment does not pertain to environmental issues and opines about the extent that the Project applicant's financial components of the proposed Project benefit the public or the project itself. See Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required.

PH-26: If the **land's too contaminated for residential development** how can it be safe to develop for commercial or office space? I don't understand that and I guess for reference we could look up north to Hunters Point [unintelligible] development because to be honest with you I'm reading my notes, I spent all day today in a public housing project doing mold remediation which balances off my working for Atherton, Los Altos Hills and all the mega tech types I work for on their properties. It's not working up there. It's already been addressed about the current zoning, which is light industrial; we need that.

**RESPONSE TO COMMENT PH-26:** As discussed in Response to Comments 2-2 and 2-3 in Chapter 6 of this document, the Draft EIR identifies impacts and feasible mitigation measures regarding development of Project site with



hazardous materials from previous uses. Specifically, Mitigation Measures HAZ-1 and HAZ-2 are primarily focused on encountering hazardous materials caused by releases and spills to soil from previous uses of the property. As discussed in Impact HAZ-2, the presence and proposed removal of hazardous building materials in existing structures (asbestos-containing materials, lead-based paint, and PCBs in electrical transformers) is addressed through compliance with numerous existing regulations, including existing land use covenants (LUCs) established by DTSC.

PH-27: I'm a small businessman, I can't afford a warehouse in Redwood City anymore because it's priced out. Doesn't work that way. Property is average rate value of \$450 a square foot through time, so my math says he's making about 600 million total, he's giving back 50. That's a 12 to 1 ratio. **I believe they're making a little more money than they should for what they're giving back. I think they can give more back to Redwood City to offset some of the other issues. The alternatives I saw that really caught my eye was the onsite public amenities.** Belmont has its sports park. A lot of parties are planned in that building itself as a group. Little league, soccer, we don't have that in Redwood City anymore. We have a little bit on Spring Street, I don't know anything else. And Mr. Burt and I were soccer dads in San Carlos back in the day. Thank you for your time.

**RESPONSE TO COMMENT PH-27:** The comment addressing the applicant's public benefits does not pertain to environmental issues. The comment also states its preferred alternative in the Draft EIR. No additional analysis or response is required.

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## Lydia Ramirez

PH-28: Good evening Council, community members. My name is Lydia Ramirez. I'm here representing. I am here to speak in favor of these planning that's being exposed today. We believe that in our point of view there's a lot of ways to help the community and developments are one of them. We believe that the labor that is being project for the Harbor View by **Jay Paul is going to bring benefits to the community.** Their offering to do improvements in the city and to do a park and have access for the public and that's not available on that specific area where the location is. We also believe that at the end of the day Jay Paul is offering improvements that are needed as helping the roads and helping to do funds for the community like schools or Sister Christina's project that are in need in our community and nobody else is going to bring it to us. In that location for the longest ...it's not been offering anything like that, so yeah there might be repercussions, but in the general point of view we believe that it's going to benefit in the long run by helping with the access and the roads and helping the parks and the access to the public that lives on that area, specifically on the East Bay Shores that has no access to any parks, they have no access to any other recreational environments, they are pretty much have

been forgotten for the rest of the expansion of the city because they are on the other side of the freeway. **So, I'm just here to do—to express my support to the Jay Paul Harbor View project** and I just want to thank you for your attention.

**RESPONSE TO COMMENT PH-28:** This comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues. Therefore, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

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## Michael Pierce

PH-29: Good evening, Mayor Bain and City Councilmembers. Thank you for the opportunity to speak this evening. My name is Michael Pierce. I serve on the Board of Directors of the St. Francis Center and have the pleasure of working with Sister Christina. **I'm here to speak in favor of this project**, primarily because of Jay Paul's efforts to provide assistance with the low income housing. If you look at the package that was provided with the City Council agenda they are going to be making a \$15.8 million affordable housing contribution based on impact fees plus the other discretionary contribution to the St. Francis Center of \$12.4 million. In all the research I've done no one else has made anything close to that as far as contributions toward low income housing. As we all know, we desperately need this. The St. Francis Center's been committed to that through its entire history. We continue to work very hard to acquire sites and hold them in perpetuity. Everything that we've acquired we've deed restricted and set aside as low income housing going forward and intend to do that. We had the pleasure of working with the City and with Stanford who helped us acquire a project downtown several years ago at 780 Bradford. As Sister Christina mentioned, we also worked with Sobrato Foundation and others to acquire a 48-unit project earlier – late last year. We continue to look for other projects like the 51-unit project that she mentioned and we will work with others who are willing to work with us to help those that are less fortunate and assemble funding to acquire and hold property in perpetuity. I ask that you consider this favorably and thank you for the opportunity to speak this evening.

**RESPONSE TO COMMENT PH-29:** This comment conveys the opinion of the commenter as to the merits of the proposed Project, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. Refer to Master Response 4 in Chapter 5 of the Final EIR. No additional analysis or response is required. All comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

## Dan Ponti

PH-30: Thank you, Mayor Bain and members of the Council. My name is Dan Ponti, I'm a resident of Redwood City. I like to say that I've been living here as long as – since cars have had fins. I'm also on the steering committee of Redwood City [unintelligible] united and you received a letter from us this afternoon that had some detailed numbers that I'll just briefly mention today.

Among many of the issues with Harbor View that I want to mention, one of the most glaring is that the draft EIR **doesn't really address the jobs/housing imbalance** in a way that makes a whole lot of sense. **It chooses to use 6-year-old [unintelligible] in the General Plan 30-year buildout projections instead of looking at our current job growth and housing demands and capacity.** As a result of that it's kind of a whitewash of the whole issue that we're facing. We detailed those numbers in a letter that I mentioned, but the bottom line is that we have nearly 2.7 million square feet of office development in the pipeline and we have up to 2.8 million more square feet available capacity in Redwood City under the current General Plan.

So we **don't need to change the General Plan to accommodate more offices. If we look at housing capacity we're talking about 2,000-3,000 available capacity units available in the city.** These are current numbers, these aren't projections. If you look at – take reasonable estimates for what those square footage turns into jobs, turns into houses, we're **looking at exceeding our demand our capacity by more than double.** So even if we don't develop any more than what's in the pipeline, by 2030 we will have doubled our – we will have exceeded – we would produce a housing demand that's our double our capacity to build it under the current General Plan. So by definition, approving office projects, especially changing the General Plan to do so when the City doesn't have any identifiable capacity to meet the corresponding housing demand, will result in housing displacement. It's not speculation, it's already happening. We're seeing low income people being displaced, we're having to sit on the freeways forever because people are having to travel from long distances.

This may not be a CEQA issue in terms of a threshold of significance, but it's a real impact and we need to look at it carefully. If we continue on this trajectory we can expect that the pressure to increase for developing in open space lands like the Cargill site will increase, if we don't act responsibly we may also put Redwood City neighborhoods at risk from upzoning from state mandates such as SB50 and other legislation that could strain what cities can do, that we won't have local control anymore. And so we need a community vision process. We can't continue to make ad hoc general plan amendments and zoning changes to address this problem, especially to address – to consider a project that's got significant impacts. So this is what I'm asking you to consider **don't move forward with any General Plan amendment until we've had an opportunity to revisit the General Plan in the context of our current job/housing dilemma.** The

Harbor View project should not be considered in isolation; we need to look at this carefully over the long-term.

**RESPONSE TO COMMENT PH-30:** Refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project’s employment density, as well as Master Response 3, which addresses the Draft EIR’s consideration of jobs/housing.

To the extent this comment conveys the opinion of the commenter as to how the Project should or should not be developed, and therefore does not pertain to environmental issues, see Master Response 4 in Chapter 5 of the Final EIR. No additional analysis or response is required. However, all comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

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## Kris Johnson

PH-31: Good evening, City Council, City Staff, members of the public. My name is Kris Johnson. I’ve been a Redwood City resident for 18 years. For members of the public new to this project it might help to understand why we are here tonight. **On July 24, 2017, there was a vote before Council to start the EIR process for this project.** Looking at our makeup of Council this evening, we had Councilmembers Aguirre and Masur vote to advance the EIR. Mayor Bain and Councilmember Borgens voted against starting the EIR process. Our Vice Mayor Diane Howard had a longstanding commitment which led to her being absent that evening. And finally, Councilmembers Hale and Reddy are new to City Council and have not chimed in publicly other than perhaps the candidate forum on the project. So given the new makeup of Council, I’d like to **thank Staff and Council for scheduling this interim step in the process that normally would have gone to the Planning Commission.**

**RESPONSE TO COMMENT PH- 31:** This comment conveys the opinion of the commenter as to the merits of the process, and therefore does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis or response is required.

PH-32: As we suspected all along, the EIR only confirmed the anticipated impacts, many of which are unavoidable and cannot be mitigated. First slide, please. Most of these impacts involve traffic. So the stars on the map indicate the intersections that will be negatively impacted by this project both from a project level impact as well as a cumulative level impact for the surrounding areas. And I quote from the EIR, **the project will add a substantial number of vehicles to the Woodside Road corridor, not just individual intersections like indicated on there, but the entire corridor, and cause vehicle delay to worsen substantially.**

**RESPONSE TO COMMENT PH- 32:** The applicant acknowledges the results of the traffic analysis in the Draft EIR. Specifically, there are numerous impacts addressed under Section 4.14, *Transportation and Traffic*, that address congestion under Criterion b related impacts. To address those impacts, appropriate mitigation measures are identified where feasible.

**PH-33: I've also indicated on three projects...very large projects, all which do not require a change to our General Plan.** We have Stanford with 1.5 million square feet as part of their development agreement, Sobrato, another large project in grade star five, which is 500,000 square feet of office and 252 housing units, three enormous projects that don't require a change to our General Plan. Next slide, please.

**RESPONSE TO COMMENT PH- 33:** This comment identifies other projects in the area that do not involve amendment to the General Plan. Therefore, the comment does not present any environmental issues that have not been adequately addressed in the Draft EIR. No additional analysis or response is required.

**PH-34: Another topic that the draft EIR only confirmed is the incredible jobs/housing imbalance that is an unavoidable byproduct of this project.** In the bottom right-hand corner of this slide is a cutout from our commercial linkage fee Nexus study. For those of you unfamiliar with the Nexus report, this Nexus study quantifies the connection between commercial development and affordable housing. So **this project is going to drive the need for 2,166 total housing units, according to our Nexus study that we commissioned. And almost half of those need to be affordable**, so 1,074 affordable housing units are being driven by that 1.179 million square feet of office space. So what **these numbers show is that even a community benefit of \$12 million to Sister Christina at St. Francis, who I personally know can work miracles with \$12 million, in no way even comes close to...**

**RESPONSE TO COMMENT PH-34:** Refer to Master Response 3 in Chapter 5 of this Final EIR, which addresses the Draft EIR's consideration of jobs/housing.

The comment opines on the inadequacy of the applicant's proposed public benefit and does not pertain to environmental issues that have not already been adequately addressed in the Draft EIR. See Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required, however, all comments, however, will be noted and made available to applicable decision-makers as they consider the Project.

## Gail Rabe, Redwood City Neighborhood United

PH-35: Mayor Bain and Councilmembers speaking on behalf of Redwood City Neighbors United and Dan Ponti mentioned that **we already submitted a letter to you** and we will **also be providing detailed comments** on the draft EIR before the March 8<sup>th</sup> deadline.

**RESPONSE TO COMMENT PH-35:** The City did not receive written comments from the Redwood City Neighbors United.

PH-36: Figure 3.6 in the draft EIR depicts a bird's eye view of the proposed Harbor View project, looking north across highway 101. So you're up in the air a little bit. This picture's also posted on the City's website, so many people may be familiar with it. In this **architect's rendering of the project mature trees planted on the project property**, they've grown up, **completely obscure Graniterock across Blomquist Street**. To block out this industrial site the trees appear to be taller than the office towers, but perhaps more significant and disturbing is that the **architect rendering completely obscures the distant huge piles of aggregates from the picture**.

**RESPONSE TO COMMENT PH-36:** The comment notes the architect's rendering of the Project. Throughout the Draft EIR, specifically in the Project Description (Chapter 3, sections 3.3.2 and 3.4.4) and Section 4.9, *Land Use and Planning*, the industrial mixed-use character of the Project vicinity, and the nature of the adjacent Graniterock operations is described. Further, as stated in Response to Comment 14-3 in Chapter 6 of this document, the specific design criteria, including landscaping and buffers, have been incorporated into the Project to mitigate against potential conflicts between the occupants of the Project site and the nearby industrial operations.

PH-37: In the Harbor View vision of Redwood City's future this industrial area is a level blank space. Perhaps it is property waiting to be developed. What changes might occur in this area if the proposed upzoning for Harbor View is approved and word gets out that Redwood City's industrial parcels and other area properties are now more valuable and are ripe for rezoning? With the **increase in property values that will follow Harbor View, pressure will mount for another saltworks proposal** for housing nearby office workers or maybe even for another high density office campus. And we can probably expect that the **effects of rising property values will extend down East Bayshore Road to the neighborhood of mobile homes. There are very real consequences to nearby industries, open space land and affordable housing if Council allows this developer to amend the City's General Plan and zoning**.

**RESPONSE TO COMMENT PH-37:** The comment generally questions potential consequences to other land uses in addition to affordable housing, if the Project is approved. The Draft EIR analyzes the potential for land use conflicts pursuant to CEQA thresholds. (Also see Response to Comment PH-36.)

To the extent this comment conveys the opinion of the commenter as to the merits of the Project, and therefore does not present any environmental issues, see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required, however, all comments will be noted and made available to applicable decision-makers as they consider the Project.

PH-38: You now have **documentation in the draft EIR of significant and unavoidable environmental impacts. Please ask the Jay Paul Company to submit a project that is consistent with our community's General Plan vision.** Thank you.

**RESPONSE TO COMMENT PH-38:** The comment acknowledges significant and unavoidable impacts identified in the Draft EIR. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR. See Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required, however, all comments will be noted and made available to applicable decision-makers as they consider the Project. No additional analysis or response is required.

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## Alice Coffman, Committee for Green Foothills

PH-39: Good evening, Mayor Bain and Councilmembers. My name's Alice Coffman, I'm with the Committee for Green Foothills. We're an environmental organization working to protect open space in San Mateo and Santa Clara counties. I want to focus on sea level rise because I didn't think anybody else was going to talk about it, but thank you, Carol, but I'll talk a little bit more about it. When we talk about sea level rise, people tend to picture a steady rise in water level, like filling a bathtub. The reality is more complex. **What we can expect with sea level rise is that long before the average water level gets high enough to overtop the shoreline we'll start to see seasonal impacts. We're already seeing water backing up through storm drains during king tides; this happens on Maple Street just down the road from the Harbor View site.** As sea levels rise that will happen not only during king tide but at every high tide, then it will happen in other low lying areas the water will be deeper, when storms happen rainwater will cause the same effect, and soon this will be the regular state in many of the low lying areas in Redwood City, and that is why just raising buildings up on fill won't solve the problem. **The roads will flood as well.** It's going to make a difference whether there are 1,800 or 4,500 workers trying to drive on those streets. 1,800 is the number workers you can expect under the General Plan, 4,500 is the number proposed under the project. And when we look how to adapt to sea level rise, it's not enough to just talk about levees, we also need to think about how to reduce our exposure to the threat of sea level rise. The more development we have that's in flood prone areas the greater our exposure. So, **before we decide to put new homes or jobs in the path of sea level rise, we should be asking can they go somewhere else.** We can't just say, well we already have a lot of development out there that we need to protect, so adding more won't make any

difference. The difference between some exposure and much higher exposure is a very real one. When heavy storms hit it will matter whether flooding causes \$1 million worth of property damage or \$5 million worth of property damage. We should not double down on the fact that we already have so much vulnerable development by making more of it.

**RESPONSE TO COMMENT PH-39:** The comment pertains to floodplain and sea level rise. Refer to Master Response 2 in Chapter 5 of this Final EIR.

PH-40: And finally, as I have a little more time, I agree with the previous speakers about the housing issue. As I'm sitting here listening to what everybody's saying I'm asking **why are we even considering adding extra office development when we know, we know that it will make our housing crisis worse.** We already have a jobs/housing imbalance and that means that we need to slow down office development and increase housing development. This project seems like going backwards and the affordable housing benefits that Jay Paul offers, while they are laudable they don't come close to mitigating the impact from this project. I would certainly **urge the Council to ask what would it take to entirely mitigate the housing impacts from this project and put that number on this project and say that's the community benefits that we need.** Thank you.

**RESPONSE TO COMMENT PH-34:** The comment opines on the inadequacy of the applicant's proposed public benefit to address affordable housing. See Master Response 3 regarding population growth and jobs/housing balance in Chapter 5 of this Final EIR. Moreover, this comment does not present any environmental issues that have not been adequately addressed in the Draft EIR, therefore see Master Response 4 in Chapter 5 of this Final EIR. No additional analysis or response is required, however, all comments will be noted and made available to applicable decision-makers as they consider the Project.

## Close of the Public Hearing

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## 7.2 City Council Members' Comments

### Vice Mayor Howard

CC-1: *Vice Mayor Howard:* I have, based on public comment I have just a couple questions and then I'll let others ask questions. It was mentioned that **in trying to figure fees it was based on a 3 either 300 or 250 square foot per person and one speaker said that Facebook was based on 150 and other business even 100 square foot per person, which gave more money to the cities in their impact fees. Could you comment on that, please?**



Previous Community Development Director Aaron Akinin's responded to the speaker during the Public Hearing and focused on the CEQA-related component of the comment: employment density. He stated examples of the range of employment densities per floor area for certain area offices, such as Facebook, Oracle and in downtown Redwood City. Mr. Akinin also explained that when overall traffic generation is being considered based on a building's occupancy, not all of the employees are in the building at one time. Therefore, the actual amount of traffic is going to be less than estimated assuming full occupancy.

**RESPONSE TO COMMENT CC-1:** The comment asking what employment density was factored into the City's calculation of impact fees does not pertain to an environmental issue and no further response is required. In further response to the CEQA-related aspect of the comment, refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses employment density for the Draft EIR Project and the Applicant's Revised Project. No additional analysis or response is required.

CC-2: *Vice Mayor Howard:* In the EIR, and we all spent hours reading through this, I think something that's not mentioned or referenced at all as far as I could find was childcare and I think, in the future, if we're going to work on doing a real environmental impact report that to me is a real missing piece in an environmental document. What is the impact of not having childcare? I understand that on this piece of property, which is 27 acres, **is it true that we cannot ask to have childcare anywhere on this property due to the way the laws are written at this time?**

Previous Community Development Director Aaron Akinin responded to the speaker during the Public Hearing, stating that it would be very difficult to have a childcare center on the site because of Graniterock as well as the freeway being right next door.

**RESPONSE TO COMMENT CC-2:** The proposed Project does not propose childcare. Generally, the Project site is located adjacent to US Highway 101, the Graniterock facility (which generates dust and particulates emissions), and diesel generators associated with the adjacent Correctional Center -- all of which are sources of toxic air contaminants (TACs). As indicated in Section 4.2, *Air Quality*, of the Draft EIR, the California Air Resources Board guidance recommends a minimum buffer of 500 feet from the edge of freeways to sensitive receptors, which includes childcare uses because children are more susceptible to respiratory distress and other air quality-related health problems than the general public.

CC-3: *Vice Mayor Howard:* So I'm guessing I could take the leap and presume that **someone who has children wouldn't be making one trip to the campus, they'd be making two trips into Redwood City because most likely they'd want to keep the childcare close to where they work, and so they'd be going to childcare and then to their office, and so that would actually increase the gridlock of traffic in Redwood City if they couldn't in fact put childcare on their campus.** And I thought that was a pretty important point and I'm hoping that there's a way we can influence our lawmakers that

**this should be included because it does increase the** traffic and it kind of skews the numbers a bit, because if you have even a fourth of the population who'd be projected to work there looking for childcare and the cars are all going around, they're going to be on 101 probably twice. **I'm real concerned about that and we don't have adequate childcare now in Redwood City to begin with.** So thank you, those were my two questions.

**RESPONSE TO COMMENT CC-3:** See Response to Comment CC-2 above regarding the relationship between onsite childcare in the Project and vehicle trips. The comment regarding the provision of childcare in the City does not address an environmental issue and no further response is required.

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## Councilmember Borgens

CC-4: *Councilmember Borgens:* Well I have several but I'll start with one. So the studies that were done on the traffic impacts, and you have them listed, I just lost my page, you took in the Woodside Road, you took in some neighborhood impacts which were direct streets like getting up to Edgewood and, and you took in Marsh and 101. Did it go – and Eastbay Shore and Seaport Boulevard – **did you take in the East Bayshore Boulevard from Seaport all the way to Marsh** where...? So would that – that's like the east side. Was that whole section studied? Because it said 101, it didn't say...

The reason I'm asking is because I live in that neighborhood, as you've heard tonight. I already know that it is heavily impacted trying to get onto Marsh from any of those directions, coming from Middlefield, coming from Stanford, coming from my neighborhood, trying to cross over onto Bayfront Expressway already. Now I know that's probably a Menlo Park location, so we have a little cross jurisdiction here, but the **impacts to adding one more car there**, considering Stanford's not built out yet, their employees aren't there yet, I really **hope that some type of look was given to that area because it's going to be impacted.** Eastbay Shore Boulevard is already a cut through street, and the people that live in the mobile parks cannot get out now. So I'm hoping that if it wasn't that there'd be an opportunity to look at that.

I would definitely add that because everyone that's traveling over there, even trying to get out from Seaport, they use Eastbay Shores to cut through to the Bayfront Expressway, which I might, too, if I had to get on Marsh Road, so um, but I feel sorry for people that are in that long line. But thank you for that; I'd like to see that looked at in the EIR.

Previous Community Development Director Aaron Aknin responded to the speaker during the Public Hearing, stating that it didn't look like that segment (East Bayshore Boulevard from Seaport all the way to Marsh) was looked at in particular, but staff could certainly add that to the analysis for the Final EIR.

**RESPONSE TO COMMENT CC-4:** As stated in Response to Comment 5-3 in Chapter 6 of this document, the process used to select the study intersections was based on the expected amount of added Project traffic; an intersection was included as a study intersection if the amount of added Project traffic could cause an intersection to operate at an unacceptable level of service or if it would add a substantial amount of traffic to an intersection already operating at an unacceptable level. The proposed list of intersections did not meet the selection criteria. Although some Project generated traffic may travel through the listed intersections, it is unlikely to cause a significant impact at intersections further from the Project site. In consultation with Redwood City staff and preliminary outputs from the C/CAG and City travel demand models during the EIR scoping phase, the list of study intersection included for analysis was expected to be comprehensive. The list of study intersections was confirmed by the City of Redwood City, the lead agency.

CC-5: *Councilmember Borgens:* I did listen to the comments; I did read most of them. We got an enormous amount of emails on this. I'm going to go on a limb and say there were over 350 maybe 400 letters from the community on this and I want to thank our Mayor for answering all of those. I appreciate it. It takes a lot of time to do that. That is incredible and he did. I think all of you that sent one in, if you didn't get an answer check when you get home today, it's there, because he did answer them all. And I'm sure people – everyone sitting up here looked at them and read them. So we have a general feeling of how the community feels moving forward and tonight our job is to look at the EIR and make comments on what the impacts of this project are if moving forward. So I do believe with some of the speakers and the work I've done that the traffic impacts, **if I counted the significant unavoidable there were over 19 of them.** That's huge for our community to have impacts that are significant and unavoidable. That means you can't do anything about it. That means that you can't mitigate them, so there isn't even a little wiggle room there. I don't know if we can look at those... I just I find that concerning.

**RESPONSE TO COMMENT CC-5:** The comment acknowledges comments received from the public and the significant and unavoidable impacts identified in the Draft EIR. However, this comment does not raise any new environmental issues or identify inadequate analysis conducted. No additional analysis or response is required.

CC-6: **Several speakers have alluded to the kind of skew in the traffic numbers and how we how we got those traffic numbers, so I'd like to have that really explained.** And as Vice Mayor Howard said, you know, **based on the square foot per person, we have seen EIRs where they were a little less than 250, so is that old data, is it comfortable data that we're using, can we look at a lower number and what those impacts would be.** Because I do think the new office space today is different than what it was and they get a lot more people in there. They want to get a bang for their buck, so they get a lot more people in there. So I would like to see if those numbers are correct because that changes all the numbers. **If we can look at a different number on that.**

**RESPONSE TO COMMENT CC-6:** Refer to Master Response 1 in Chapter 5 of this Final EIR, which addresses the Project’s employment density, and includes relevant comparative analysis considering different ratios.

CC-7: *Councilmember Borgens:* We don’t have any public works in the room. I was wondering with our infrastructure right now for our water treatment um. If I remember correctly there was a **not too long ago we had an issue with our pump facility that it needed to be repaired quickly because there were some repairs that needed to be done due to capacity.** So I would – I want to make sure that when we start putting anything in there – **offices today are different because they have gyms and they have all this, they have showers, there’s a different use here,** so I want to make sure we’re comparing apples and apples when we’re talking about environmental studies in the new office environment. So I want to **make sure we’re looking at the ability of you know what we think they’re going to use in utilities basis what they’re actually using.** And I get that we have you know solar and we’ve got you know some better ways of generating our electricity and our water, but I want to **make sure that we’re not underestimating that use.**

**RESPONSE TO COMMENT CC-7:** See Section 4.13, *Utilities and Service Systems*, of the Draft EIR, which includes an analysis of the Project’s effect on existing sanitary sewer facilities and capacity. All characteristics of the Project are considered in the *Utility Feasibility Study* (BKF Engineers, 2018), which estimates flows of the Project. Impact UTIL-1 discusses the Project’s less than significant impact on sewer capacity and infrastructure. As also described in the *Approach to Analysis* in Section 4.13, as is typical for major development projects, further engineering analyses will be required during the design phase of the Project, including use of the City’s computer model of the sanitary sewer system to verify the proposed sanitary sewer pipe sizes. It is not anticipated that the additional engineering analyses would be substantially different from the work conducted for the Draft EIR based on reliable information from City reports and qualified engineering consultants. Moreover, conditions and engineering estimates presented in the 2015 West Yost report and 2018 BKF study are suitable for determining the environmental effects in the Draft EIR. All improvements are assumed to be implemented in accordance with all applicable City Standards and Guidelines.

CC-8: *Councilmember Borgens:* I am concerned with the environmental impacts, so I want to make sure that when we talk about air quality and they’re significant, that’s air quality for all of us. You know we already have an air quality issue out there and I’m thankful for Graniterock. **I think Graniterock is an amazing business, but it’s dusty, it’s very dusty out there.** And I remember when Pacific Shores went in at the end. I clearly remember when we approved that development and they weren’t going to have a problem with the fact that we had the auto crusher out there – Sims Metal – and the first thing they complained about was the dust on the cars. Okay I mean it happens, okay, but you’re not

going to get away from that. **That is our light industrial area. I like the fact that our city is diverse.**

**RESPONSE TO COMMENT CC-8:** The comment acknowledges existing conditions of the industrial uses near the Project site and one instance of adverse dust effects occurring when non-industrial uses were introduced to such an area.

CC-9: *Councilmember Borgens:* We have a vibrant downtown, you know we have a port, we have an active port, and currently **our General Plan says that we should utilize, as much as we can, that space for the port resources.** So if we're going to look at something in the EIR, maybe a less impact. **There was the environmental superior project was you know a lower build, something that might support our port.** So I'm looking at that, but those are my thoughts for now.

**RESPONSE TO COMMENT CC-9:** As stated in Response to Comment 8-40 in Chapter 6 of this document, pursuant to CEQA, the alternatives analysis should consider variations to the Project or its location that “would avoid or substantially lessen any of the significant effects of the project” [CEQA Guidelines Section 15126.6(a)]. As stated in Chapter 5, *Alternatives*, of the Draft EIR, all of the Project alternatives, including both No Project alternatives, would result in significant and unavoidable traffic impacts. Therefore, only the implementation of a project that is substantially less intensive than that already considered and allowed under the General Plan would successfully reduce all impacts to less-than-significant levels.

In addition, the Applicant's Revised Project is included in Chapter 2, *Description and Analysis of the Applicant's Revised Project*, of this Final EIR as an additional alternative, and proposes similar office use as analyzed in the Draft EIR. Regarding an alternative that would not require an amendment to the General Plan, the various No Project alternatives in the Draft EIR consider the likely effects of what could happen if the proposed Project were not implemented and some future project was proposed that would conform to the site's existing land use and zoning designations.

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## Councilmember Masur

CC-10: *Councilmember Masur:* Thanks. I won't ask you all of my very detailed questions, but I do have a few additional questions. One of them is kind of a big one and I'm not sure that we can fully answer it now, so I guess I'd like it studied a little bit more, which is – my read of the EIR was that it **didn't show a significant impact on the jobs/housing imbalance**, and I think that was due to the buildout in our General Plan of the number of houses – the housing units that could be built under the General Plan. **Am I understanding it correctly?**

**Is there a way though to maybe do a little more granular analysis on that within an EIR that does sort of help us understand the number of housing units needed, you know like our Nexus study that did sort of give us an estimate of what are the housing units we need per square foot of office? Is that something else that we could look and as we go to the final EIR?**

I think that would be useful because it is a little bit hard to sort of reconcile you know all of the work that we've done around housing and all the studies that we've done around building of office versus the and creation of jobs, which has been great for our community, at the same time it has put us in a difficult situation around housing. **This Council spent a lot of time talking about the jobs/housing imbalance, but I think it would be helpful to have a little more understanding of that in the final EIR.**

Previous Community Development Director Aaron Aknin responded to the speaker during the Public Hearing and confirmed that the Draft EIR identifies a less-than-significant impact regarding jobs/housing imbalance due to the number of housing units that could be built under the General Plan. Specifically, Mr. Aknin explained that, looking at the overall buildout of the General Plan, in theory, the City will catch up with the housing needs.

**RESPONSE TO COMMENT CC-10:** See Master Response 3 in Chapter 5 of this document regarding population growth and jobs/housing balance. Also, see Response to Comment 8-17 in Chapter 6 of this document which clarifies possible housing demand of the Project in response to comments received on the Draft EIR.

CC-11: *Councilmember Masur:* I think the points about sea level rise are good. I understand that it isn't just rising incrementally, that when – as it rises we are having waves, etc. that are coming in, so it's not just like, oh the sea is two inches higher, and if you're five inches higher then you're good to go. That being said, all of the maps that I've looked at didn't show that property as much in the path of sea level rise+, maybe some properties right next to it which are already built, but that's a discussion for another day. So, I'm wondering if we could do a little bit more look at that and **what the developers propose to both mitigate the impacts of sea level rise on their own property, but also on the surrounding properties**, because I agree that the issues around flooding on the roads in that area are also significant. Even **when it rains right now a lot of that roadway is, not under water, but you do have big, giant puddles of water that you're driving through, so some analysis of that and some understanding of what that would like I think would be helpful for me to see as well.**

**RESPONSE TO COMMENT CC-11:** As explained in the Draft EIR and Master Response 2 in Chapter 5 of this Final EIR, pursuant to CEQA, sea level rise is addressed in terms of flooding, including storm surge. Under CEQA, a project could exacerbate existing or future coastal flood hazards if the project would increase the frequency or severity of flooding or cause flooding in an area that would not be subject to flooding without the project. The Project will incorporate strategies to ensure its resiliency to accepted projections of sea level

rise; no aspect of the Project would exacerbate the potential effect of future flooding or sea level rise to adjacent properties.

CC-12: *Councilmember Masur*: Another question I have is on the bridge, the proposed bridge across Blomquist, which we've been again talking about for quite some time. And it was brought to my attention and I just didn't know the answer to this question, is **what study has been done on the building of that bridge and what's the slope that we would need to make sure that the bridge also is taking into account sea level rise** and you know going from the road over the creek and then back to where it would eventually be a road, which is now sort of just like a dirt flat. So have we done some studying on that already or is that not yet completed?

We've already approved a housing project out there, just as a reminder for everybody, there is a housing project for – it's 131 units if I'm correct. So even just with that, and then the housing units that have been built on the other side of the Blomquist bridge (somebody referenced Blue Harbor, one Marina), **there is going to be a need to make it possible to get out of that area more than one way, and so I think – maybe not for this EIR, but just sort of in general – it would be good to understand the feasibility of doing that.** I know they've been talking about it in Mountain View, too, over at Stevens Creek, and so just a better understanding of that.

Previous Community Development Director Aaron Akin responded to the comment during the Public Hearing. He explained that the City had an older study that looked at the bridge conceptually, and that there hasn't been 65 percent design drawings done, so that is something staff would look into further. Mr. Akin also clarified that part of Blomquist is being extended essentially up to the creek itself, but not over yet.

**RESPONSE TO COMMENT CC-12:** The Blomquist Bridge project is not proposed as part of the Project analyzed in this EIR. See Response to Comment 8-2 in Chapter 6 of this document, which updates discussion of the bridge in the Draft EIR and the applicant's proposed partial funding of the bridge through the City's Transportation Impact Mitigation Fee Program (TIF).

CC-13: *Councilmember Masur*: The EIR talks about the **toxicity of the site** and what we've heard about it in a variety of different ways, and what I couldn't really understand was, in its current form, **if nothing happens, are the current toxins already leaching into the soil, leaching on into the bay. I thought I read in the EIR that the developer has to clean up the site either way no matter what – whether this project is built or not, but is that correct** or what's the what's the answer to that question?

I think it would be **helpful to know the current toxins that are there, what's happening with them now, are they contaminating the bay currently**, and if that's possible, I mean this may not be totally possible to understand, but if it's possible to understand I think that would be helpful to understand. And then if there was some building on there then **what would that cleanup look like and how extensive would it**

**need to be, and would it leave the site in a better place than it is right now just from the toxic standpoint.**

Community Development Director Aaron Aknin responded during the Public Hearing, stating that, in general, the type of land use determines the type of cleanup you have to do to the overall site, and that staff could look into that.

**RESPONSE TO COMMENT CC-13:** Previous See Response to Comments PH-26 regarding the analysis and mitigation measures of hazardous materials, which is discussed in detailed in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR. The Draft EIR, starting on page 4.7-3 of the Draft EIR and based on a site-specific Phase I Site Assessment by RPS (2018) concludes that some areas of the Project site will require remediation. Contaminants mentioned to potentially affect groundwater or Bay Mud are Total Petroleum Hydrocarbons (TPH) that may have spread from a 2011 offsite spill; the San Mateo County Environmental Health Department (SMCEH) is requiring further investigation to include areas of the Project site.

As mentioned in Response to Comment 2-1 in Chapter 6 of this document, approximately 115,000 cubic yards of clean materials is estimated for the Project. Presently, the Final Removal Action Work plan (RAW) has yet to be prepared and there are no estimates of quantities of off-hauled hazardous materials. However, the construction schedule indicates that on-site asbestos would be addressed via onsite containment over a two-month period and not exported off-site. Containment activities for hazardous materials may consist of encapsulation with concrete, asphalt, building foundations, or fill placed thick enough to prevent vapor intrusion modest amount of additional off-road equipment use and concrete truck trips. Conservatively, the analysis in the Draft EIR estimate a two-month period of two bulldozer and one backhoe operations and 100 additional concrete truck trips.

Overall, compliance with existing laws and regulations is required and the relevant regulatory agencies (e.g., the Bay Area Air Quality Management District) would continue to enforce laws and regulations pertaining to the development of this site, and compliance would be a condition of building permits.

CC-14: *Councilmember Masur*: A lot of the emails we got reference the port and port businesses. **I haven't heard from the port how they feel about this project.** Has anybody talked to them? I just think it's interesting because, you know, it was sort of like if you could pull out some themes from the emails, one of the big themes was like you're ruining the port businesses, but the port hasn't actually weighed in on this and **I trust the port mainly to tell us is this going to have a negative impact on the port operations**, as we certainly want our port to be strong, we certainly want the port businesses to be supportive. They are a great contributor to – somebody mentioned our tax revenue, and they are a great contributor to our budget and we appreciate all that has happened out there, so.



**RESPONSE TO COMMENT CC-14:** Previous Community Development Director Aaron Akin responded to the speaker during the Public Hearing, stating that staff had not received any official communication from the Port taking a stance on this Project for this particular site. He continued that the Port has been supportive of industrial uses in and around the Port area, and this Project is closer to the immediate Port area and the industrial uses there. Since the end of the public comment period, the City received a comment letter dated March 8, 2019, from the Port of Redwood City on the Draft EIR. See Letter 4 and its response in Chapter 6 of this document.

CC-15: *Councilmember Masur:* **It would be good to understand the tax impact of a project** like this what is **the contribution to our property tax** as it is now or as it would be in the future.

**RESPONSE TO COMMENT CC-15:** This comment does not pertain to environmental issues in the Draft EIR.

CC-16: *Councilmember Masur:* And I guess for me I'd like to see not just an analysis of a full buildout but an analysis of the environmentally superior recommendations. I would like to see some further study because, as apparently as I'm learning, **when you have the alternatives in an EIR, you don't get the full analysis, you get sort of a summary analysis.** For me I would like us to **see if we could consider something that encompasses that environmentally superior buildout.**

**RESPONSE TO COMMENT CC-16:** See Response to Comment CC-9 above.

CC-17: *Councilmember Masur:* You know, I would just say, you know to the **question about childcare**, there has been – there have been some additions to the project that did recognize some of the things that we said. One of them was a contribution – a proposed contribution of a million dollars to a childcare fund. We just in our retreat did list **children and youth as a priority** as one of the things that we wanted to see, so a **childcare fund would be useful, whether it outweighs the other aspects of the project**, I don't think we're here to make that determination tonight, but I just did want to raise that.

**RESPONSE TO COMMENT CC-17:** This comment does not pertain to environmental issues. See Response to Comment CC-2 above.

CC-18: *Councilmember Masur:* You know **another positive, I think, is that it does have a project labor agreement**, and for those of you who don't know, a lot of the building trades workers are people who live in Redwood City. And **so, a lot of our Redwood City residents would be working on a project like this** um, which is also a benefit, but, again, I'm not trying to weigh – I'm not trying to make a determination about the project,

I'm just recognizing that, as somebody pointed out, **you have to sort of balance things when you're sitting up here.**

**RESPONSE TO COMMENT CC-18:** This comment does not pertain to environmental issues, see Master Response 4 in Chapter 5 of this Final EIR.

CC-19: *Councilmember Masur:* And **fees for affordable housing I feel can't be discounted**, which, again, housing we put as a priority on our list at our retreat on Saturday, so I wouldn't want to discount that. That being said, **the traffic impacts are significant and unavoidable**, as we saw.

**RESPONSE TO COMMENT CC-19:** The comment also acknowledges that significant and unavoidable traffic impacts are identified for the Project, but does not raise questions or inadequacy in the Draft EIR.

CC-20: *Councilmember Masur:* And so I guess the other question I would want to understand is how – **the Woodside 101 interchange needs to be fixed whether we build something out there or not**, and we've been working on it as a city for quite some time, I think well before I got on the Council that project was started. So **I would like to understand sort of whether it's in conjunction with this project** the next time we see it or some update in the future. **How are we going to get that fixed** and what kinds of – what kinds of – **how were you thinking of putting that money together.** We all know, we've all tried to get off on Woodside at some point during the day, and we sit there for quite some time waiting for the light to change, and so I think that is critical. And when you look at further impacts out there, further impacts on 101, and then impacts in other parts of the city far away from the project, I do think it's something that we do need to understand better.

**RESPONSE TO COMMENT CC-20:** Impacts and mitigation measures identified in the Draft EIR were made independent of the 101/84 interchange being built. For many impacts identified in the Draft EIR, the mitigation measure is listed as contribution towards the construction of the 101/84 interchange. Due to the uncertainty surrounding funding and timing of the interchange's construction, and moreover since the proposed Project is only responsible for paying its fair share contribution towards the interchange improvements, the impacts remain significant and unavoidable. All significant impacts that would not be mitigated to less-than-significant with the interchange are considered significant and unavoidable.

At this time there is no mechanism in place, however, the City will work to establish a specific mechanism between the City and Caltrans to collect and transfer the 101/84 fair share contribution. If the 101/84 interchange improvement fails to materialize within a reasonable timeframe, fair share contributions would be returned to the Project applicant.

CC-21: *Councilmember Masur:* **What a reduced project might look like**, so I'll leave it at that.

**RESPONSE TO COMMENT CC-21:** See Response to Comment CC-9 above.

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## Councilmember Hale

CC-22: *Councilmember Hale:* Thank you, Mr. Mayor. Alright, I'm going to recap some of what Councilmember Masur covered that was actually on my list, mostly for emphasis, but I'll be brief there, and then cover some additional points. I had the **same question about the port**. We received almost 400 emails, so I actually thought maybe I had missed something from the port. **And we haven't heard from them?** So we could either take silence as an answer or we could reach out and just hear what they have to say, because I would personally be interested in hearing that and solidifying that as a legitimate concern or qualifying it more, perhaps.

**RESPONSE TO COMMENT CC-22:** The comment refers to Comment CC-14 above. The City received a comment letter dated March 8, 2019, from the Port of Redwood City on the Draft EIR. See Letter 4 and its response in Chapter 6 of this document.

CC-23: *Councilmember Hale:* I wanted to plus one on the **jobs/housing balance**. What I think about is accounting, right, and I think it's so tricky because it is really regional. But **we have over contributed relative to our peers on housing, so I want to understand where we are on that equation overall as a city** so that we're doing the right things. So it'd be interesting to look at that.

**RESPONSE TO COMMENT CC-23:** Refer to Master Response 3, which addresses the Draft EIR's consideration of jobs/housing. The comment requests information of City staff regarding status.

CC-24: *Councilmember Hale:* And then I certainly wanted to see the **tax impacts added to the full grid of proposed and alternates** because I think that that absolutely – it's just a factor not THE factor, but it's A factor and I think everybody should have all the information when these types of decisions are made. So then I wanted to get in some additional questions.

**RESPONSE TO COMMENT CC-24:** As stated in response to this topic in Response to Comment CC-15, this comment does not pertain to environmental issues in the Draft EIR.

CC-25: *Councilmember Hale:* So I think as a community **we're getting really used to mixed use projects; we're seeing a lot of them coming at us**. And **this project is different**, in that from my understanding **a lot of the uses that we would normally like to see in a mixed use development are not allowed on this project**. Can you speak more to that? I mean

**childcare would be a great example.** I personally don't understand this because it's like why can you work in a building for like 8 hours or 10 hours a day, but – so it's okay for you but it's not okay for a child, **but I think the state has something to say about that,** so could you clarify that?

Previous Community Development Director Aaron Akin responded to the speaker during the Public Hearing. First, staff explained that the state makes recommendations about what can be put within 500 feet of a freeway, what can be put within 500 feet of something like Graniterock, and that limits “sensitive receptors” and therefore limits people and children, for example, being in a childcare center. Staff further explained that zoning itself limits where certain uses can exist. The zoning for this area allows certain things like industrial uses and R&D uses. With the proposed amendment to the General Plan it would allow office parks, but it would not allow traditional mixed use development, in which you might have housing.

Mr. Akin stated that he did not see the Project site ever being used in the more traditional sense of mixed use of housing and commercial; there could be a different mixture of uses, like, some R&D and more traditional industrial, but you could not have mixed uses like those in downtown or along El Camino Real.

**RESPONSE TO COMMENT CC-25:** See Response to Comment CC-2 above.

CC-26: *Councilmember Hale:* I do want to commend you though, because I think one of the things that I've liked seeing from our planning staff this past year was that previously, for example, with housing we would just charge this impact fee and it would go into this fund, but without a shovel ready project it didn't equate to housing in the short-term, and you and your team have taken that and really put the onus on the developer to go find a project. So if it's not appropriate for housing on that site, and there certainly have been projects now we're seeing where they have worked the housing in and that's great, but in this case because it doesn't allow that use they've gone out and found a viable shovel ready project. **And so, with childcare, is that also – soccer fields came up and I know that is a huge interest in the community right now – does that also extend to the soccer fields,** because the children – it's children may be coming in contact with the soils?

And then **my understanding was there was also a community benefit around some sort of community or family center, but that would be permissible in the current conditions?**

Previous Community Development Director Aaron Akin responded to the speaker during the Public Hearing and stated that staff would assess the potential for soccer fields on the project site and how the state defines sensitive receptors – specifically “preferred” or “prohibited,” and that existing locations where there are sports fields along US 101 and Interstate 280.

**RESPONSE TO COMMENT CC-26:** Based on staff's further study to prepare this response to comment for this Final EIR, Section 5.5.6 of the Draft EIR analyzes the On-site Public Amenities Alternative, which would introduce outdoor recreational uses (in addition to ancillary child care for Project employee use), which is a sensitive receptor due to the greater exposure to ambient air quality conditions resulting during vigorous exercise that can place a high demand on the human respiratory system. The analysis determines that a TAC exposure impact with this alternative would be considered potentially significant, although a health risk screening analysis was not conducted nor required for the alternatives assessment the Draft EIR. A range of measures to address the potential impact are listed. Assuming that a community or family center would be located in or near the proposed amenities building, the same measures would likely apply, such as the incorporation of air filtration devices with specific minimum ratings to reduce cancer risks and Particulate Matter (PM) exposure, among others specified in the Draft EIR.

The Draft EIR fully assessed and disclosed the limitations of uses that would include a soccer field and community building that includes outdoor space, particularly as they relate to sensitive air quality receptors at the site.

CC-27: *Councilmember Hale:* So, most of the feedback that I've heard has been focused on the main proposal, **the main project, but then there are a series of alternates that are also proposed, and then there's always an NEIR, like nothing happens alternate. Could you speak to how likely is that?** Like something will be built here. Is that fairly accurate?

Previous Community Development Director Aaron Akin responded to the non-environmental comment by the speaker during the Public Hearing. Staff explained the land use process to develop property and responsibility of the lead agency, under the California Environmental Quality Act to perform an analysis of a development that is proposed, as well as City Council discretion to approve a proposal that is consistent with the zoning or existing General Plan but that triggers a significant and unavoidable impact.

**RESPONSE TO COMMENT CC-27:** This comment does not pertain to environmental issues. Also see Response to Comment CC-9 above.

CC-28: *Councilmember Hale:* I found Table 5-1 to be most fascinating; I classify in my mind is 5 buckets of impacts. The potential reduction in economic diversity, contribution to the jobs/housing imbalance, worsening of traffic, sea level rise implications, and potential impacts to the port. And if you look at the alternatives, for example, if you took sea level rise, there would be something there in all of these alternatives. So what I would love to better understand is what this is zoned for. Some of these projects are exactly the same; Discounting the proposed project, but then looking at all the alternates, for example under **light industrial that's actually a larger project than the environmentally superior project, which I found interesting.**

The reduced buildout and building height option is actually smaller than the existing General Plan scenario, so I think that's just interesting and something that we should discuss or think about. And **the service population certainly had a huge spike when you look at the proposed project, but it gets narrower once you get into the alternatives**, which was interesting.

So I guess my point there is something's going to be built here and **we need to consider all the tradeoffs because there are significant impacts across the board.**

Previous Community Development Director Aaron Akin responded to the speaker during the Public Hearing, clarifying that the term “environmentally superior project,” is the project that still meets the applicant’s overall goal for the type of project they’re doing; it does not necessarily mean the most environmentally superior project.

**RESPONSE TO COMMENT CC-28:** This comment recognizes that a larger development alternative may have lesser impacts than a smaller development alternative. This is due to several factors associated with a particular land use or facility (such as vehicle trip generation, employment or population ratios) that affect certain environmental effects differently. The alternatives analysis in the Draft EIR largely focuses on the physical environmental impacts when identifying an environmentally superior alternative (see section 5.7 in Chapter 5, *Alternatives*, of the Draft EIR).

CC-29: *Councilmember Hale:* I think the **alternatives are something we should also explore** and I hope that – I think Sister Christina said we need to **work together to balance impacts with benefits**, and if anything characterized tonight for me, it's that quote. It's that the reality is there is very likely something that is going to happen at this site and that we're hearing a lot of comment from the community that they are not happy with what is being proposed, that there are alternatives, **and we should be figuring out, as a community, which of those alternatives is the best possible use for our community and for our needs.**

**RESPONSE TO COMMENT CC-29:** As required under CEQA, Chapter 5, *Alternatives*, of the Draft EIR describes and presents a comparative analysis of a set of alternatives to the proposed project for consideration by decision-makers.

CC-30: *Councilmember Hale:* **I would also beseech the developer to keep the community benefits on the table** through that discussion. These are significant community benefits. I am relatively new at this job, **but I know that to get the Woodside 101 project built we need to first produce funding.** Before we can get funding from the state and there aren't many places that that kind of fund – seed funding can come from. So I do find that interesting.

**RESPONSE TO COMMENT CC-30:** This comment does not present any environmental issues.

CC-31: *Councilmember Hale*: I think **the family space needs better definition**, and I think you've spoken to some of what we need to define that, but I think it is helpful when people can completely wrap their arms around what a benefit looks like.

**RESPONSE TO COMMENT CC-31:** See Response to Comment CC-25 above.

CC-32: *Councilmember Hale*: And **I'm excited that the affordable housing is a shovel ready project with a partner that has a lot of credibility in the community.**

**RESPONSE TO COMMENT CC-32:** This comment does not present any environmental issues.

CC-33: *Councilmember Hale*: And I will add that childcare – if you saw in the Mercury News – has increased 41 percent in cost in the last 4 years. And so just like with housing, supply is part of that equation and **we definitely need more childcare so I also take that seriously.**

**RESPONSE TO COMMENT CC-33:** See Response to Comment CC-2 above.

CC-34: *Councilmember Hale*: **I'm interested in exploring some of the alternatives, the reduced buildout alternative in particular, and then having a very responsible tradeoff discussion with here are the benefits, here are the downsides and the risks and if something is going to happen there, you know, what do we want that to be. And I would say to the developer, too, I've been really impressed lately –** I know you're not supposed to compare developments, but where we've had projects come to us and there's been really significant community discussion and then we've really seen the projects change, where you can point to like I remember we made that comment, or I heard that comment from a community member, and then you saw the project change. And you can kind of flip through and see the evolution of a project to meet the needs of the community, and I would love to see that. **And I think for everybody that came tonight, because this is part of a process, take that energy and channel it into talking with this developer and staff,** because that's the rule that you – well not you anymore, but other people play is bringing us together around the conversation of what do we want this to be and what are we willing to live with and what are we not willing to live with, and we've certainly heard a lot of that feedback from the community and I want to be respectful of that, too.

You know, from everything from choosing 1 per 250 square feet, we could refine that in our traffic analysis to what the alternatives are overall. You know, one thing from a staff standpoint, **I think we would recommend that we look into more is the ratio of parking related to the number of people there.** It's something that the developer and I have debated for the last 4 years or so, that, you know, the biggest – **one of the biggest indicators of about how many people will drive to the site is the number of parking spaces that's available at that site.** So you know as councilmembers make comments, if you could think through that as well, you know, that's something we could also study

within an environmental document and the final study of what that correlation is and if we could reduce overall trips by putting less parking on the site.

Previous Community Development Aaron Akin responded to the speaker during the Public Hearing, clarifying that the City, the lead agency under CEQA, hired the CEQA consultant ESA and did the analysis; the Project applicant, Jay Paul, did not hire ESA.

**RESPONSE TO COMMENT CC-34:** This comment does not present any environmental issues. However, as introduced in Response to Comment CC-1 and Master Response 1 in Chapter 5 of this Final EIR, a comprehensive assessment and update of employment density conducted for the Draft EIR Project and the Applicant's Revised Project. Further, Master Response 1 includes updates to all population-based analyses (e.g., air quality, GHG emissions, noise, VMT) based on consistently applied employment population (250 square feet per employee) for comparative and informational purposes.

Also, as detailed in Chapter 2 of this Final EIR, the Project Applicant submitted a Revised Project that results in reduced impacts compared to the Draft EIR (see Table 2-2), as the Revised Project has notably less development (see Table 2-1). Regarding parking spaces, the Revised Project involves fewer parking spaces, but the parking ratio to office floor area is generally the same as with the Draft EIR Project.

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## Mayor Bain

**CC-35: Mayor Bain: In your experience how far does \$15 million go in terms of building housing units? Approximately how many either market rate or below market rate housing units do you think could be built for that amount of money?**

Previous Community Development Director Aaron Akin responded to the speaker during the Public Hearing, addressing the non-environmental topic of housing construction costs.

**RESPONSE TO COMMENT CC-35:** This comment does not address any environmental issues.

**CC-36: Mayor Bain: I have serious concerns about the project in its proposed state.** As everyone seems to be aware, I voted against initiating the General Plan process for precisely the reasons that have been outlined in terms of those impacts. I want to put a few things in perspective. Some of my colleagues mentioned that we did have an offsite meeting on Saturday where we discussed, among other things, our seven strategic priorities and whether they were the right priorities, and it became very clear during the course of that discussion of our strategic initiatives that we really do have three priorities that rose above everything else for 2019. Those were number one housing, number two transportation and number three childcare. We'll elaborate on those when we get to the



state of the City in terms of how we view those things going forward. **If we look at this from a housing impact standpoint, I can't help but think this is going to create more demand on our already strained housing market.** With all due respect to the great work that Sister Christina and others do, to acquire and deed restrict affordable units I believe is going to create a significant demand, not just on below market units, but on market rate units which we are already feeling right now in this area.

**RESPONSE TO COMMENT CC-36:** Refer to Master Response 3, which addresses the Draft EIR's consideration of jobs/housing. This comment does not present any environmental issues that have not been adequately addressed in the Draft EIR.

CC-37: *Mayor Bain:* The traffic impact is, to Vice Mayor Howard's point, the infrastructure's not there. **Taking away parking is not the answer to traffic management.** Unless you give people an alternative way to get there, they're going to drive anyway. I speak from experience because I've had to be a commuter most of my career and not that long ago I worked in a building that used that approach and the problem with parking spilled over into neighborhoods, it spilled over into neighboring businesses where cars got towed, the building manager and the office manager tried creative ways to solve that using shuttles and agreements with nearby businesses. It was a disaster and it was a disaster because it was not in a place where this office was accessible by public transportation. Unfortunately, I had no choice but to drive. If I could have taken public transportation to this office I would have done so, but the public transportation option would have taken me 2.5 hours versus half an hour in the car, so I chose to be one of those people who did park several blocks away in a residential neighborhood and walked about half a mile to work after that. **That's not a good solution. I don't think that's something we should seriously study until we get the infrastructure.** I know Vice Mayor Howard's been working very hard to try and bring **ferry service to our port.** If that happens it's a game changer, but honestly we're probably years away. Vice Mayor Howard has also been working very diligently on **shuttle service. We don't currently have a shuttle.** We've been talking with various businesses including Stanford about what they can do to provide citywide shuttle service. Getting around the city is a challenge, getting around the region is a challenge, which is why traffic is our number two priority.

**RESPONSE TO COMMENT CC-37:** See City Staff Response to Comment CC-33 encouraging discussions about parking limitation.

CC-38: *Mayor Bain:* Like my colleagues, **I have concerns about the mix of businesses,** too. I liked having Lyngso there. Lyngso was a great asset to our community; it's been there a very, very long time and now it's gone and in our neighbor San Carlos. That's their gain, it's our loss. **We need a diverse economy.** I was here for the 2010 General Plan. It was drafted in such a way to encourage a diverse mix of businesses. I believe that we are reaching the limits of our General Plan in some ways and we need to revisit that, so this

is one of the things that I brought up at the offsite meeting is we need a community visioning process where we bring the community in and we say what does our community look like in 10-15 years. We're not going to stand still, we're not going to freeze things the way we are, we're going to continue to change and grow, but we need to do it in a way that community can come along with and in a way that's environmentally responsible, and in a way that anticipates changing things such as sea level rise. I don't believe that we should do a series of general plan amendments, even if it's a project that we really, really like. **Doing a series of General Plan amendments is being on the back foot and being reactive. That's not a way to lead a city.** I don't want to do that. So, our General Plan doesn't need an update. That's one of the things that I propose that we do in the next two years because I know how long it takes and I know how much money it takes to do that. I think it's not just taking a look at this area, it's taking a look at a number of areas around our city where we want to focus growth in a way that makes sense near transportation corridors.

**Let me just say that the developer is entitled to build something and I fully expect that they will build something or somebody else will build something, but I would like to see that be consistent with our General Plan** because if a proposal comes to us that is not consistent, that requires a General Plan amendment, the position that puts us in is we have to weigh the benefits and the disadvantages, the impacts if you will, and then say do these benefits outweigh the impact so much that we can then explain to the public why we changed the General Plan to allow a development. That's a very high bar for me and I'm not there yet. **If it were just up to me I would not continue with the process of amending the General Plan, but it's not just up to me.** I have not seen anything to date that would change my position from my 2017 vote. With that, I think the developer will have some thinking to do.

**RESPONSE TO COMMENT CC-38:** This comment does not present any environmental issues and no further response is required.

## End of City Council Discussion

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# CHAPTER 8

## Mitigation Monitoring and Reporting Program

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### 8.1 Introduction

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires public agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring and Reporting Program (MMRP) for the Harbor View Project. The intent of the MMRP is to prescribe and enforce a means for properly and successfully implementing the mitigation measures identified within the Draft Environmental Impact Report (Draft EIR) for this project.

### 8.2 Mitigation Measures

The table below lists all mitigation measures for the project. The MMRP describes the actions that must take place to implement each mitigation measure, the timing of those actions, and the entities responsible for implementing and monitoring the actions.

### 8.3 MMRP Components

The components of the attached table, which contains applicable mitigation measures, are addressed briefly, below.

**Impact:** This column summarizes the impact stated in the Draft EIR.

**Mitigation Measure:** All mitigation measures that were identified in the Draft EIR are presented, and numbered accordingly.

**Action:** For every mitigation measure, one or more actions are described. The actions delineate the means by which the mitigation measures will be implemented, and, in some instances, the criteria for determining whether a measure has been successfully implemented. Where mitigation measures are particularly detailed, the action may refer back to the measure.

**Implementing Party:** This item identifies the entity that will undertake the required action, which is typically the project applicant or its designee.

**Action Timing:** Implementation of the action must occur prior to or during some part of project approval, project design or construction or on an ongoing basis. The timing for each measure is identified.

**Monitoring Schedule:** The general schedule for conducting each monitoring and reporting task, identifying where appropriate both the timing and the frequency of the action.

**Monitoring Party:** The City of Redwood City is primarily responsible for ensuring that mitigation measures are successfully implemented. Within the City, a number of departments and divisions would have responsibility for monitoring some aspect of the overall project.

**TABLE 8-1  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
<b>4.2 Air Quality and Climate Change</b>					
<p><b>Impact AIR-1:</b> Construction activities associated with the Project would generate fugitive dust and criteria air pollutants, and exceed the BAAQMD significance threshold for construction criteria air pollutant NOx.</p>	<p><b>Mitigation Measure AIR-1A:</b> Implement BAAQMD Basic Construction Mitigation Measures. The Project sponsor shall require construction contractors to implement the following applicable BAAQMD Basic Construction Mitigation Measures to reduce emissions of fugitive dust and equipment exhaust:</p> <ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>• 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.</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 mph.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.</li> <li>• 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 BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Measure is incorporated into construction specifications  Construction contractor carries out construction pursuant to contract specifications</p>	<p>City of Redwood City – Building Division to observe Project construction and respond to any dust complaints</p>	<p>Prior to issuance of demolition and/or building permits  During all Project site preparation and construction activities</p>
<p><b>Impact AIR-1.CU:</b> Development of the Project, combined with cumulative development citywide, would result in cumulative air quality impacts.</p>	<p><b>Mitigation Measure AIR-1B:</b> Implement BAAQMD additional construction mitigation measures.</p> <ul style="list-style-type: none"> <li>• The Project sponsor shall require construction contractors to implement the following measures, recommended for projects with construction emissions above significance thresholds to further reduce fugitive dust and exhaust emissions.</li> <li>• All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.</li> <li>• All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</li> <li>• Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.</li> <li>• Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.</li> <li>• The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.</li> <li>• All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</li> <li>• Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.</li> <li>• Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.</li> <li>• Minimizing the idling time of diesel powered construction equipment to two minutes.</li> </ul>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Develop plan demonstrating that the off-road construction equipment would achieve reductions specified in measure.  Implement emission reduction measures</p>	<p>City of Redwood City – Planning Division to review/confirm plan City of Redwood City – Building Division to confirm adherence to measure</p>	<p>Prior to issuance of demolition and/or building permits  During all Project site preparation and construction activities</p>

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
	<ul style="list-style-type: none"> <li>The Project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.</li> <li>Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</li> <li>Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. Compliance with this measure requires that constructors use off-road equipment that have engines that meet or exceed CARB Tier 4 off-road emission standards which have the lowest NOx and PM emissions of commercially available equipment.</li> </ul> <p>Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.</p> <p><b>Mitigation Measure AIR-1C:</b> Use of Renewable Diesel Fuel during Construction.</p> <p>The Project sponsor shall require construction contractors to ensure that all diesel powered off-road construction equipment shall be fueled with renewable diesel, which has been demonstrated to reduce NOx emissions by approximately 10 percent (Tanikawa, 2015).</p>	<p>Project Applicant or designee</p> <p>Construction contractor(s)</p>	<p>Develop plan demonstrating that the diesel powered off-road construction equipment would achieve reduction specified in measure</p> <p>Implement emission reduction measures</p>	<p>City of Redwood City – Planning Division to review/confirm plan</p> <p>City of Redwood City – Building Division to confirm adherence to measure</p>	<p>Prior to issuance of demolition and/or building permits</p> <p>During all Project site preparation and construction activities</p>
<b>4.3 Biological Resources</b>					
<p><b>Impact BIO-1:</b> The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service.</p>	<p><b>Mitigation Measure BIO-1c:</b> Nesting Bird Measures</p> <p>The Project applicant shall conduct pre-construction nesting bird surveys for areas containing, or likely to contain, habitat for nesting birds prior to any bridge construction, tree removal, grading or construction. The City shall require the Project applicant to implement specific measures to avoid and minimize impacts on nesting birds including, but not limited to those described below.</p> <ul style="list-style-type: none"> <li>To the extent practicable, construction activities including building demolition, vegetation and tree removal, and new site construction shall be performed between September 1 and January 31 in order to avoid the avian nesting season. If these activities cannot be performed during this period, a preconstruction survey for nesting birds shall be conducted by a qualified biologist.</li> <li>During the avian nesting season (February 1 through August 31), a qualified biologist shall survey construction areas within and in the vicinity of the Project site for nesting raptors and passerine birds not more than 14 days prior to any ground-disturbing activity or vegetation removal. Surveys shall include all potential habitats within 500 feet (for raptors) of activities and all on-site vegetation including bare ground within 250 feet of activities (for all other species). These buffer distances may also be modified if obstacles such as buildings or trees obscure the construction area from active bird nests, or existing disturbances create an ambient background disturbance similar to the proposed disturbance.</li> <li>If active nests are found either within the Project site or within the 500-foot survey buffer surrounding the Project site, no-work buffer zones shall be established around the nests in coordination with CDFW. No demolition, vegetation removal, or ground-disturbing activities shall occur within a buffer zone until young have fledged or the nest is otherwise abandoned as determined by the qualified biologist. If work during the nesting season stops for 14 days or more and then resumes, then nesting bird surveys shall be repeated, to ensure that no new birds have begun nesting in the area.</li> <li>Typically, the size of individual buffers ranges from a minimum of 250 feet for raptors to a minimum of 50 feet for other birds but can be adjusted based on an evaluation of the site by a qualified biologist in cooperation with the USFWS and/or CDFW.</li> <li>Birds that establish nests after construction starts are assumed to be habituated to and tolerant of the indirect impacts resulting from construction noise and human activity. However, direct take of nests, eggs, and nestlings is still prohibited and a buffer must be established to avoid nest destruction.</li> </ul>	<p>Project Applicant or designee</p> <p>Construction contractor(s)</p> <p>Qualified biologist during bird breeding season</p>	<p>if construction is during breeding season, conduct nesting bird surveys not more than 14 days prior to any ground-disturbing activity or vegetation removal</p> <p>Establish/adhere to buffer zones, if applicable</p>	<p>City of Redwood City – Planning Division to review/confirm plan</p> <p>City of Redwood City – Building Division to confirm preconstruction tree surveys</p>	<p>Prior to tree removal</p> <p>During all Project site preparation and construction activities</p>

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
<p>Results of any survey shall be forwarded to CDFW (if results are positive for nesting birds) and avoidance procedures shall be adopted, if necessary, on a case-by-case basis. These may include construction buffer areas (up to several hundred feet in the case of raptors) or seasonal avoidance.</p>	<p>•</p> <p><b>Mitigation Measure BIO-1d: Protection of Roosting Bats</b></p> <p>The Project applicant shall take the following steps to avoid direct losses of maternity roosts, winter roosts, or individual bats and indirect impacts to bat breeding success:</p> <ul style="list-style-type: none"> <li>• Prior to construction or demolition activities within 250 feet of trees/structures with at least a moderate potential to support special-status bats, a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with the CDFW allowing the biologist to handle and collect bats) shall survey for bats. If no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required.</li> <li>• If bats raising pups are present within 250 feet of the Project site during project construction activities (typically April 15 through August 15), the project sponsor shall create a no-disturbance buffer acceptable in size to the CDFW around the bat roosts. Bat roosts initiated within 250 feet of the Project site after construction has already begun are presumed to be unaffected by project-related disturbance, and no buffer would be necessary. However, the "take" of individuals (e.g., direct mortality of individuals, or destruction of their roost while bats are present) is prohibited.</li> <li>• Trees or buildings with evidence of bat activity shall be removed during the time that is least likely to affect bats as determined by a qualified bat biologist (in general, roosts should not be removed if maternity bat roosts are present, typically April 15 – August 15, and roosts should not be removed if present bats are in torpor, typically when temperatures are less than 40 degrees Fahrenheit). Non-maternity bat roosts shall be removed by a qualified biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.</li> </ul> <p>All special-status bat roosts that are destroyed shall be replaced at a 1:1 ratio with a roost suitable for the displaced species. The roost will be modified as necessary to provide a suitable roosting environment for the target bat species.</p>	<p>Project Applicant or designee</p> <p>Construction contractor(s)</p> <p>Qualified biologist during bat breeding season</p>	<p>Conduct nesting bird survey if construction is during breeding season</p> <p>Establish/adhere to buffer zones and/or replacement ratios, if applicable</p>	<p>City of Redwood City – Building Division and Planning Division to review and approve plans and measures, and if required, no-disturbance buffers</p>	<p>Prior to construction or demolition activities in areas that could support special-status bats</p> <p>During all Project site preparation and construction activities</p>
<p><b>Impact BIO-3:</b> The Project could substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.</p>	<p><b>Mitigation Measure BIO-3a: Bird-Safe Building Requirements.</b> <u>To the extent feasible, bird-safe glazing treatments (e.g., fritting, frosting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing, or ultraviolet patterns visible to birds) shall be used to reduce the extent of untreated glass to less than 10 percent on each of the Project buildings.</u></p> <p><b>Mitigation Measure BIO-3b: Lighting Requirements.</b> The Project shall implement Bird-Safe lighting design and operations, to include the following: 1) The built environment should be designed to minimize light pollution including: light trespass, over-illumination, glare, light clutter, and skyglow while using bird-friendly lighting colors when possible; 2) Unneeded interior and exterior lighting shall be turned off from dusk to dawn during migration periods, defined here as February 15 through May 31 and August 15 through November 30; 3) At all times, rooms where interior lighting is used at night should have window coverings that adequately block light transmission, and motion sensors or controls to extinguish lights in unoccupied spaces.</p>	<p>Project Applicant or designee</p> <p>Qualified biologist</p>	<p>Submit building, lighting, and structural plans to the City Building Division that meet the requirements of the bird-strike avoidance specifications as specified in the mitigation measure</p> <p>Peer review and approval of the above by a qualified biologist with appropriate expertise</p> <p>Submit documentation of all of the above as specified in the mitigation measure.</p>	<p>City of Redwood City – Planning Division to review and verify required measures prior to approval of construction-related permit</p> <p>City of Redwood City – Building Division to verify installation of physical measures</p>	<p>Prior to issuance of building permits for each project building</p> <p>Prior to issuance of final permit</p>
<p><b>Impact BIO-4:</b> The Project could conflict with the City of Redwood City's Tree Protection Ordinance (Redwood City Municipal Code Chapter 35.3) by removal of protected trees under certain circumstances.</p>	<p><b>Mitigation Measure BIO-4: Tree Protection Measures</b></p> <p>Adequate protection shall be provided by the Project applicant during the construction period for any trees which are to remain standing and deemed to be potentially endangered by said site work. The Project applicant will adhere to all tree protection measures applicable to the Project outlined in Section 5.0 Tree Protection Measures of the Harbor View Place Arborist Report (2018), which include but are not limited to the following:</p> <ol style="list-style-type: none"> <li>1) Before the start of any clearing, excavation, construction or other work on the Project Site, every tree to remain and deemed to be potentially endangered by said site work ('protected tree') shall be securely fenced off at a distance from the base of the tree to be determined by the City's Parks and Recreation Director or Project arborist. This will be considered the Tree Protection Zone (TPZ) and will be consistent with the measures provided in the project's Arborist Report. Such TPZs shall remain in place for duration of all such work. All trees to be</li> </ol>	<p>Project Applicant or designee</p> <p>Construction contractor(s)</p> <p>Qualified arborist</p>	<p>Submit plans to the City Building Division that meet the requirements of the tree protection measures specified in the mitigation measure</p> <p>Peer review and approval of the above by a qualified arborist with appropriate expertise</p>	<p>City of Redwood City – Planning Division to review and verify required measures prior to approval of construction-related permit</p> <p>City of Redwood City – City Arborist and Planning Division to verify installation of physical measures</p>	<p>Prior to issuance of building permits for each project building</p> <p>During all Project site preparation and construction activities</p>



**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
	<p>removed shall be clearly marked. A scheme shall be established for the removal and disposal of logs, brush, earth and other debris which will avoid injury to any protected tree.</p> <p>2) Where proposed development or other site work is to encroach upon the protected perimeter of any protected tree, special measures shall be incorporated to allow the roots to breathe and obtain water and nutrients. Any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter shall be minimized. No change in existing ground level shall occur within a distance to be determined by the City's Parks and Recreation Director or Project arborist from the base of any protected tree at any time. No burning or use of equipment with an open flame shall occur near or within the protected perimeter of any protected tree.</p> <p>3) No storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees shall occur within any protected tree TPZ, or any other location on the site from which such substances might enter the protected perimeter. No heavy construction equipment or construction materials shall be operated or stored within the TPZ of any protected tree. Wires, ropes, or other devices shall not be attached to any protected tree, except as needed for support of the tree. No sign, other than a tag showing the botanical classification, shall be attached to any protected tree.</p> <p>4) Periodically during construction, the leaves of protected trees shall be thoroughly sprayed with water to prevent buildup of dust and other pollution that would inhibit leaf transpiration.</p> <p>5) If any damage to a protected tree should occur during or as a result of work on the site, the Project applicant shall immediately notify the Parks and Recreation Department of such damage. If, in the professional opinion of the City's Parks and Recreation Director or Project arborist, such tree cannot be preserved in a healthy state, the Director shall require replacement of any tree removed with another tree or trees on the same site deemed adequate by the Director to compensate for the loss of the tree that is removed.</p> <p>6) All debris created as a result of any tree removal work shall be removed by the Project applicant from the property within two weeks of debris creation, and such debris shall be properly disposed of by the Project applicant in accordance with all applicable laws, ordinances, and regulations.</p>				
<b>4.4 Cultural Resources and Tribal Cultural Resources</b>					
<b>Impact CUL-2:</b> The Project could result in significant impacts to unknown archaeological resources.	<b>Mitigation Measure CUL-2:</b> Inadvertent Discovery of Archaeological Resources or Tribal Cultural Resources.	Construction contractor(s) Qualified archaeologist	Inspect the findings within 24 hours of discovery	City of Redwood City – Building Division to verify construction activities within 100 feet of find are stopped	During construction, if necessary, review and approve recommended avoidance measures, and/or suspension of construction.
<b>Impact CUL-5:</b> The Project could result in significant impacts to unknown tribal cultural resources.	If prehistoric or historic-period archaeological resources are encountered, all construction activities within 100 feet of the find shall halt and the City of Redwood City shall be notified. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones.			City of Redwood City – Building Division to verify inspection, if resources are discovered	
<b>Impact CUL-1.CU:</b> The Project, in combination with cumulative development in the vicinity of the Project site, would contribute to a significant adverse cumulative impact to cultural resources, but the contribution would not be considerable.	Historic-era materials might include deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist shall inspect the findings within 24 hours of discovery.				
	If it is determined that the project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines) or cause a substantial adverse change in the significance of a tribal cultural resource (defined in Public Resources Code Section 21074), mitigation shall be implemented in accordance with PRC Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. If preservation in place is feasible, this may be accomplished through one of the following means: (1) modifying the construction plan to avoid the resource; (2) incorporating the resource within open space; (3) capping and covering the resource before building appropriate facilities on the resource site; or (4) deeding resource site into a permanent conservation easement.	Construction contractor(s) Qualified archaeologist	If damage to resources is determined, implement mitigation per specified PRC and CEQA Guidelines	City of Redwood City – Building Division and Planning Division to verify adherence to applicable mitigation approach.	Throughout construction

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
	Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource to be impacted by the project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals.	Qualified archaeologist	Prepare /implement detailed treatment plan	City of Redwood City – Building Division and Planning Division to verify preparation and implementation of treatment plan.  City of Redwood City –Planning Division to confirm appropriate Native American representation for recovery, if applicable.	Prior to any excavation at the resource site
<b>Impact CUL-3:</b> The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<b>Mitigation Measure CUL-3:</b> Inadvertent Discovery of Paleontological Resources.  If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Redwood City.	Project Applicant or designee  Construction contractor(s)  Qualified paleontologist	Compliance if any paleontological resources are discovered	City of Redwood City – Building Division to approve avoidance measures recommended by qualified paleontologist	During all ground-disturbing activities
<b>Impact CUL-1.CU:</b> The Project, in combination with cumulative development in the vicinity of the Project site, would contribute to a significant adverse cumulative impact to cultural resources, but the contribution would not be considerable.					
<b>Impact CUL-4:</b> The Project could disturb human remains, including those interred outside of formal cemeteries.	<b>Mitigation Measure CUL-4:</b> Inadvertent Discovery of Human Remains.  In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease until the San Mateo County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission (NAHC) will be contacted within 24 hours if it is determined that the remains are Native American. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the City of Redwood City for the appropriate means of treating the human remains and any grave goods.	Project Applicant or designee  Construction contractor(s)	Incorporate requirements into the design and construction specifications; comply with mitigation if remains are found.	City of Redwood City – Building Division to approve avoidance measures recommended by qualified paleontologist	During all ground-disturbing activities
<b>Impact CUL-1.CU:</b> The Project, in combination with cumulative development in the vicinity of the Project site, would contribute to a significant adverse cumulative impact to cultural resources, but the contribution would not be considerable.					
<b>4.6 Greenhouse Gas Emissions and Energy</b>					
<b>Impact GHG-1:</b> The Project would produce greenhouse gas emissions that exceed 1,100 metric tons of CO2e per year, but would not exceed 2020 or 2030 CO2e per service population emission thresholds.	<b>Mitigation Measure GHG-1:</b> The Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement. The TDM Plan must achieve the emissions reduction and/or percent reduction in VMT specified in Table 4.6-8 for the Revised Project in the Final EIR.	Project Applicant or designee	Submit verification of emissions reduction specified in measure  Adhere to monitoring requirements of measure	City of Redwood City – Planning Division to review and confirm emissions reduction  City of Redwood City – Building Division to review and confirm emissions reduction	Prior to issuance of building permits for each project building  Throughout project operation per ongoing monitoring per measure
<b>4.7 Hazards and Hazardous Materials</b>					
<b>Impact HAZ-1:</b> The Project could create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.	<b>Mitigation Measure HAZ-1a:</b> Prior to the issuance of a grading permit, the Project applicant shall implement the recommendations contained in the Project-specific Phase I Assessment (RPS, 2018) and submit to the City evidence of approval of the Draft Removal Action Workplan (RAW) by the Department of Toxic Substances Control (DTSC) that contains a Site Management Plan (SMP), Health and Safety Plan stamped by a Certified Industrial Hygienist, a voluntary Dust Control Plan/Asbestos Dust Mitigation Plan/Asbestos Air Monitoring Plan, a Waste Transportation Plan, and Construction Quality Assurance Plan.	Project Applicant or designee	Submit appropriate plans to the satisfaction of the City Building Division.  Submit remediation verification to the satisfaction of the City Building Division, in compliance with applicable laws and regulations.	City of Redwood City – Building Division to review and confirm emissions reduction	Prior to issuance of grading permits
<b>Impact HAZ-4:</b> The Project would 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, create a significant hazard to the public or environment.					
<b>Impact HAZ-1.CU:</b> The Project, combined with cumulative development in the Project vicinity and citywide, could contribute considerably to cumulative impacts related to hazards and hazardous materials.	<b>Mitigation Measure HAZ-1b:</b> Prior to the issuance of an occupancy a grading permit, the Project applicant shall record a Land Use Covenant (LUC), in a form approved by the City, that requires that the SMP to be followed during future earthwork activities during and post-development. The LUC shall include conditional language describing when implementation of the SMP will be required for earthwork activities beneath either hardscaped areas or a beneath a specified thickness of clean fill or marker fabric required for non-hardscaped areas. The LUC shall also include language to prohibit the use of groundwater beneath the Project site.				

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
<b>4.8 Hydrology and Water Quality</b>					
<b>Impact HYD-5:</b> The Project could exceed the capacity of existing or planned stormwater infrastructure.	<b>Mitigation Measure HYD-5:</b> Pump Station Infrastructure Prior to issuance of a certificate of occupancy for the Project, the Project sponsor shall install a new redundant duty pump at the Oddstad Pump Station and a new redundant duty pump at the Seaport Pump Station, pursuant to the <i>Inner Harbor Specific Plan Utilities Engineering Report</i> prepared by West Yost for the City of Redwood City, April 2015, and new stormwater mains to connect to the Seaport Boulevard Public Station, both in accordance with all applicable City of Redwood City Engineering Standards, to the satisfaction of the City. <u>The Project sponsor shall receive a credit for costs of the infrastructure work above the proportionate share of potential new development attributable to the Project, as determined by City.</u>	Project Applicant or designee Construction contractor(s)	Install specified infrastructure	City of Redwood City – Engineering Division to review and inspect installation  City of Redwood City – Engineering Division to review post-Project conditions and determine if credit for cost is warranted.	Prior to issuance of a certificate of occupancy  Post Project operation
<b>4.10 Noise</b>					
<b>Impact NOI-1:</b> Construction activities associated with the Project would result in substantial temporary or periodic increases in ambient noise levels in excess of standards in the Project vicinity.	<b>Mitigation Measure NOI-1:</b> Throughout demolition, grading and construction, the Project applicant shall require construction contractors to limit standard construction activities as follows: <ul style="list-style-type: none"><li>Consistent with Section 24.32 of the Redwood City Noise Ordinance, construction activities shall be limited to the hours of 7:00 AM to 8:00 PM on weekdays; no construction shall take place at any time on Saturdays, Sundays, and holidays, if the construction generates noise levels exceeding the local ambient noise level measured at any point within a residential area.</li><li>Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds.</li><li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA.</li><li>Stationary noise sources shall be located as far from adjacent receptors as possible and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.</li></ul>	Project Applicant or designee Construction contractor(s)	Incorporate requirements into the project plans, construction contracts and/or construction bid solicitation materials  Comply with measures and limitations	City of Redwood City – Transportation to review and confirm incorporation of measures	Prior to issuance of building permits for each project building  During all Project site preparation and construction activities
<b>4.14 Transportation and Traffic</b>					
<b>Impact TRANS-1:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially.	<b>Mitigation Measure TRANS-1:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-2:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially.	<b>Mitigation Measure TRANS-2A:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  <del><b>Mitigation Measure TRANS-2B:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct geometric changes to the westbound (Middlefield) approach at Woodside Road / Middlefield Road to the satisfaction of the City, including two left turn pockets of 400 feet, one through lane, and a shared through right lane pocket of 100 feet.</del>	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-3:</b> The Project would add traffic to intersection #8 Blomquist Street / Seaport Boulevard / East Bayshore Road and would cause this intersection to degrade from acceptable operations of LOS C to unacceptable operations of LOS F in the PM peak hour under Existing Plus Project without Blomquist Extension Conditions.	<b>Mitigation Measure TRANS-3A:</b> Project, the Project applicant shall reconstruct the westbound approach of East Bayshore to accommodate two left-turn lanes with 225-foot pockets, one through lane, and an extended right-turn pocket (from 50 feet to 150 feet). In addition, the applicant shall install a second eastbound right-turn pocket on Blomquist Street. Improvements shall be constructed to the satisfaction of the City.	Project Applicant or designee Construction contractor(s)	Submit design and construction specifications	City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications	Prior to issuance of construction contracts and/or construction bid solicitation materials.

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
	<b>Mitigation Measure TRANS-3B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Project Applicant or designee Construction contractor(s)	Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City  Submit annual TDM monitoring reports	City of Redwood City – Transportation Division to review and approve plan  To conduct annual monitoring	Prior to issuance of first building permit for the Project  Ongoing, annually
<b>Impact TRANS-4:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane which currently operate at LOS F in the PM peak hour under Existing Plus Project Conditions without Blomquist Extension Conditions.	<b>Mitigation Measure TRANS-4:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection of Seaport Boulevard/Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee Construction contractor(s)	Submit design and construction specifications	City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation	Prior to issuance of first certificate of occupancy
<b>Impact TRANS-5:</b> The Project would add traffic to intersection #21 Edgewood Road / Alameda de Las Pulgas and would cause this intersection to degrade from acceptable operations of LOS D to unacceptable operations of LOS E in the AM peak hour under Existing Plus Project Conditions.	<b>Mitigation Measure TRANS-5:</b> Prior to receiving the first certificate of occupancy for the Project, improvements to signal operations shall be made by the Project applicant at the intersection of Edgewood Road/Alameda de Las Pulgas, to the satisfaction of City. The eastbound and westbound (Edgewood Road) signal phasing shall be reprogrammed from split phasing to concurrent permissive phases, allowing for eastbound and westbound through vehicles to travel concurrently. This phasing modification would also change the eastbound and westbound left-turn movements from protected to permissive. Additionally, appropriate signage (E.g. "Left turn yield on green") to support the change shall be added to the eastbound and westbound approaches.	Project Applicant or designee Construction contractor(s)	Submit design and construction specifications  Implement improvement	City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation	Prior to issuance of first certificate of occupancy
<b>Impact TRANS-6:</b> The Project would result in the addition of traffic to intersection #1 Veterans Boulevard / Whipple Road and would cause this intersection to degrade from LOS D to LOS E in the AM peak hour under Existing Plus Project Conditions	<b>Mitigation Measure TRANS-6:</b> The Project applicant shall install improvements to signal operations at the intersection of Veterans Boulevard/Whipple Road, prior to receiving the first certificate of occupancy for the Project. Green time shall be added to the southbound (Veterans Boulevard) through movement (phase 6) and southbound left-turn movement (phase 1) while the green time for the northbound through movement (phase 2) and northbound left-turn movement (phase 5) shall be reduced during the AM peak hour. The overall cycle length shall be shortened from 125 to 120 seconds	Project Applicant or designee Construction contractor(s)	Submit design and construction specifications  Implement improvement	City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation	Prior to issuance of first certificate of occupancy
<b>Impact TRANS-7:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially	<b>Mitigation Measure TRANS-7:</b> The Project applicant shall contribute its fair share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-8:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially	<b>Mitigation Measure TRANS-8A:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  <b>Mitigation Measure TRANS-8B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-9:</b> The Project would add traffic to intersection #8 Blomquist Street / Seaport Boulevard / East Bayshore Road and would cause this intersection to degrade from acceptable operations of LOS C to unacceptable operations of LOS F in the AM and PM peak hours under Existing Plus Project Condition.	<b>Mitigation Measure TRANS-9A:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall reconstruct the westbound (East Bayshore Road) approach at the intersection of Blomquist Street/Seaport Boulevard/East Bayshore Road to accommodate two left-turn lanes with 225-foot pockets, one through lane, and an extended right-turn pocket (from 50 feet to 150 feet). In addition, the applicant shall install a second eastbound (Blomquist Street) right-turn pocket. Improvements shall be constructed to the satisfaction of the City.  <b>Mitigation Measure TRANS-9B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Project Applicant or designee Construction contractor(s)	Submit design and construction specifications  Implement improvement	City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation	Prior to issuance of first certificate of occupancy
		Project Applicant or designee Construction contractor(s)	Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City	City of Redwood City – Transportation Division to review and approve plan	Prior to issuance of first building permit for the Project

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
<p><b>Impact TRANS-10:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane which currently operates at LOS F in the PM peak hour under Existing Plus Project Conditions with Blomquist Extension Conditions.</p>	<p><b>Mitigation Measure TRANS-10:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection of Seaport Boulevard/Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Submit annual TDM monitoring reports Submit design and construction specifications Implement improvement</p>	<p>To conduct annual monitoring City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation</p>	<p>Ongoing, annually Prior to issuance of first certificate of occupancy</p>
<p><b>Impact TRANS-11:</b> The Project would add traffic to intersection #21 Edgewood Road / Alameda de Las Pulgas and would cause this intersection to degrade from acceptable operations of LOS D to unacceptable operations of LOS E in the AM peak hour under Existing Plus Project Conditions with Blomquist Extension.</p>	<p><b>Mitigation Measure TRANS-11:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall make improvements to signal operations at the intersection of Edgewood Road/Alameda de Las Pulgas to the satisfaction of the City. The eastbound and westbound (Edgewood Road) signal phasing should be reprogrammed from split phasing to concurrent permissive phases. This phasing allows for eastbound and westbound through vehicles to travel concurrently. This phasing modification would also change the eastbound and westbound left-turn movements from protected to permissive. Additionally, appropriate signage (E.g. “Left turn yield on green”) to support the change shall be added to the eastbound and westbound approaches.</p>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Submit design and construction specifications Implement improvement</p>	<p>City of Redwood City – Transportation Division to ensure submittal and accuracy of design and construction specifications and implementation</p>	<p>Prior to issuance of first certificate of occupancy</p>
<p><b>Impact TRANS-12:</b> Project-generated traffic would cause the following mainline freeway segments to exceed their LOS standard:</p> <p>A. Southbound US 101 north of Whipple Avenue – AM peak hour</p> <p>C. Northbound US 101 south of Woodside Road – AM peak hour</p>	<p><b>Mitigation Measure TRANS-12A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 southbound north of Whipple and northbound south of Woodside Road should a feasible solution be identified prior to issuance of the final building occupancy permit.</p>	<p>Mitigation measure fully implemented by others, and no further related improvements are planned. Implementation or fair share contribution by the Project Applicant is no longer required.</p>			<p>Mitigation measure Completed.</p>
	<p><b>Mitigation Measure TRANS-12B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City Submit annual TDM monitoring reports</p>	<p>City of Redwood City – Transportation Division to review and approve plan To conduct annual monitoring</p>	<p>Prior to issuance of first building permit for the Project Ongoing, annually</p>
<p><b>Impact TRANS-13:</b> The Project would add traffic to the northbound US 101 off-ramp to Woodside Road and would cause this freeway ramp to exceed its capacity in the AM peak hour (V/C ratio = 1.03) under Existing Plus Project Conditions.</p>	<p><b>Mitigation Measure TRANS-13:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the northbound Woodside Road off-ramp and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans’s control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Contribute required fair-share contribution</p>	<p>City of Redwood City – Transportation Division to ensure submittal of required fair-share payment</p>	<p>Prior to issuance of first building permit for the Project</p>
<p><b>Impact TRANS-14:</b> Project-generated traffic would cause the following mainline freeway segments to exceed their LOS standard:</p> <p>A. Southbound US 101 north of Whipple Avenue – AM peak hour</p> <p>C. Northbound US 101 south of Woodside Road – AM peak hour</p>	<p><b>Mitigation Measure TRANS-14A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 southbound north of Whipple and northbound south of Woodside Road.</p>	<p>Mitigation measure fully implemented by others, and no further related improvements are planned. Implementation or fair share contribution by the Project Applicant is no longer required.</p>			<p>Mitigation measure Completed.</p>
<p>C.</p>	<p><b>Mitigation Measure TRANS-14B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the “Transportation Demand Management” section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.</p>	<p>Project Applicant or designee Construction contractor(s)</p>	<p>Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City Submit annual TDM monitoring reports</p>	<p>City of Redwood City – Transportation Division to review and approve plan To conduct annual monitoring</p>	<p>Prior to issuance of first building permit for the Project Ongoing, annually</p>

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Implementation Responsibility</b>	<b>Action</b>	<b>Monitoring Party</b>	<b>Monitoring Schedule</b>
<b>Impact TRANS-15:</b> The Project would add traffic to the northbound US 101 off-ramp to Woodside Road and would cause this freeway ramp to exceed its capacity in the AM peak hour (V/C ratio = 1.03) under Existing Plus Project Conditions.	<b>Mitigation Measure TRANS-15:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the northbound Woodside Road off-ramp and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-26:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM peak hour for intersection #4 Veterans Boulevard / Maple Street (Criteria a and b).	<b>Mitigation Measure TRANS-26:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall contribute its fair share contribution to geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet or to 250 feet or to the satisfaction of the City; and to optimize overall cycle length and adjust green split timing.	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-21:</b> Construction associated with development of the Project would increase traffic volumes at area intersections and on area freeways, potentially causing temporary increased congestion and/or disruption of vehicle, pedestrian, bicycle and transit circulation.	<b>Mitigation Measure TRANS-21:</b> The Project applicant shall develop and submit to the City for approval a construction management plans that specifies measures that would reduce impacts of construction-related traffic to motor vehicle, bicycle, pedestrian, and transit circulation. The City must approve the plans prior to issuance of a building permit. Construction management plans shall include the following: <ul style="list-style-type: none"> <li>• Location of construction staging areas for materials, equipment, and vehicles;</li> <li>• Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur;</li> <li>• Identification of haul routes for movement of construction vehicles that would minimize impacts on vehicular, bicycle, and pedestrian traffic, circulation, and safety; and provision for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the Project applicant;</li> <li>• Provisions for removal of trash generated by Project construction activity;</li> <li>• A process for responding to, and tracking complaints pertaining to construction activity, including identification of an on-site complaint manager; and</li> <li>• Provisions for pedestrian, bicycle, and transit circulation through the congestion zone, including maintaining pedestrian and bicycle access between the bridge over Redwood Creek and Blomquist Street sidewalks and bike lanes.</li> </ul> Implementation of this mitigation measure would improve temporary construction conditions and improve safety for all modes of transportation.	Project Applicant or designee Construction contractor(s)	Develop and submit to the City for approval a construction management plans	City of Redwood City – Transportation Division to confirm submittal and review plan	Prior to issuance of first building permit for the Project
<b>Impact TRANS-22:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially.	<b>Mitigation Measure TRANS-22:</b> Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<b>Impact TRANS-23:</b> The Project would add a substantial number of vehicles to the Woodside Road corridor and cause vehicle delay to worsen substantially.	<b>Mitigation Measure TRANS-23A:</b> Prior to issuance of the first building permit, the Project applicant shall contribute its fair share contribution, as determined by the City to provide additional capacity along the Woodside Road corridor and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project.  <b>Mitigation Measure TRANS-23B:</b> applicant shall implement geometric changes to intersection #10 Bay Road/Woodside Road to the satisfaction of the City. Changes are to convert the eastbound (Bay Road) approach to a left turn pocket of 100 feet, one through lane, and a shared through right lane, add a northbound (Woodside Road) through lane, and convert the westbound approach to a right turn pocket of 250 feet, a left turn pocket of 250 feet, and three westbound through lanes. Additionally, the overall cycle length shall be optimized while adding protected left turn phases for both the westbound and eastbound movements.  <b>Mitigation Measure TRANS-23C:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall implement geometric changes to intersection #11 Woodside Road/Middlefield Road to the satisfaction of the City. Changes are to modify the westbound (Middlefield Road) approach to two left turn lanes with 400-foot pockets, one through lane, and one shared through right lane with a 400-foot pocket.	Project Applicant or designee Construction contractor(s)	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
			Mitigation measure not applicable to the project; deleted in Final EIR (Ch.4, #21).		
			Mitigation measure not applicable to the project; deleted in Final EIR (Ch.4, #21).		

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Implementation Responsibility</b>	<b>Action</b>	<b>Monitoring Party</b>	<b>Monitoring Schedule</b>
	<del><b>Mitigation Measure TRANS-23D</b></del> <b>TRANS-23B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Project Applicant or designee Construction contractor(s)	Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City  Submit annual TDM monitoring reports	City of Redwood City – Transportation Division to review and approve plan  To conduct annual monitoring	Prior to issuance of first building permit for the Project  Ongoing, annually
<b>Impact TRANS-24:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM and PM peak hours for intersection #1 Veterans Boulevard / Whipple Avenue.	<b>Mitigation Measure TRANS-24:</b> Prior to receiving the certificate of occupancy, the Project sponsor shall implement improvements to signal operations at the intersection of Veterans Boulevard/Whipple Avenue to optimize overall cycle length and adjusting green split timing to the satisfaction of the City.	Project Applicant or designee Construction contractor(s)	Develop and submit to the City for approval a construction management plans	City of Redwood City – Transportation Division to confirm submittal and review plan	Prior to issuance of first building permit for the Project
<b>Impact TRANS-25:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the PM peak hour for intersection #3 Bair Island Road / East Bayshore Road.	<del><b>Mitigation Measure TRANS-25A:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall construct intersection geometry improvements at Bair Island Road / East Bayshore Road. The geometry improvements are widening the roundabout to two circulation lanes, and changing the westbound approach to one through lane and a 100-foot right turn pocket. In addition, the southbound approach would be widened into two lanes, one left turn and one right turn lane.</del>	Mitigation measure not applicable to the project; deleted in Final EIR (Ch.4, #22).			
	<del><b>Mitigation Measure TRANS-25B</b></del> <b>TRANS-25:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Project Applicant or designee Construction contractor(s)	Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City  Submit annual TDM monitoring reports	City of Redwood City – Transportation Division to review and approve plan  To conduct annual monitoring	Prior to issuance of first building permit for the Project  Ongoing, annually
<b>Impact TRANS-26:</b> The Project would contribute a considerable amount of traffic and increase intersection delay by more than five seconds in the AM peak hour for intersection #4 Veterans Boulevard / Maple Street.	<del><b>Mitigation Measure TRANS-26:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall contribute its fair share contribution to implement geometry improvements to the intersection at Veterans Boulevard / Maple Street by extending the westbound (Veterans Boulevard) left-turn pocket from 150 feet to 200 feet and the eastbound (Veterans) left-turn pocket from 150 feet to 250 feet or to the satisfaction of the City; and to, in addition, the applicant shall make signal improvements to optimize overall cycle length and adjust green split timing. Green time shall be added to the eastbound left turn movement (phase 1), westbound left turn movement (phase 5), and northbound and southbound through movements (phase 4), while overall cycle length shall extend from 116 second to 160 seconds. Project applicant shall also coordinate with the City to ensure that signal timing changes do not negatively affect adjacent coordinated signals along Veterans Boulevard.</del>	Project Applicant or designee Construction contractor(s)	Develop and submit to the City for approval a construction management plans	City of Redwood City – Transportation Division to confirm submittal and review plan	Prior to issuance of first building permit for the Project
<b>Impact TRANS-27:</b> The Project would add traffic to and would cause delay to worsen by more than five seconds at intersection #9 Seaport Boulevard / Lyngso Lane in the PM peak hour.	<b>Mitigation Measure TRANS-27:</b> Prior to receiving the first certificate of occupancy for the Project, the Project applicant shall install a new actuated traffic signal at the intersection at Seaport Boulevard / Lyngso Lane, to the satisfaction of the City. The new signal shall be designed with a cycle length of 90 seconds and coordinated phases with the adjacent signal at Seaport Boulevard/Blomquist Street. The intersection shall include a protected northbound left turn phase and prohibit eastbound left-turns.  (The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)	Project Applicant or designee	Develop and submit to the City for approval a construction management plans	City of Redwood City – Transportation Division to confirm submittal and review plan	Prior to issuance of first building permit for the Project
<b>Impact TRANS-28:</b> Under Cumulative Plus Project Conditions, the Project would add traffic volumes representing more than one percent of the segment's capacity to the following freeway segments exceeding their LOS standard and/or capacity without the Project:  A. Southbound US 101 north of Whipple Avenue – AM and PM peak hours A. Northbound US 101 north of Whipple Avenue – PM peak hour B. Southbound US 101 south of Whipple Avenue – AM and PM peak hours C. Northbound US 101 south of Woodside Road – AM peak hour D. Southbound US 101 south of Woodside Road	<del><b>Mitigation Measure TRANS- 28A:</b> The Project applicant shall exercise good faith efforts to work with Caltrans and the City to construct an additional mixed-flow and/or HOV lane on US 101 at Whipple Avenue and Woodside Road.</del>  <b>Mitigation Measure TRANS- 28B:</b> As a secondary mitigation measure, the Project would be responsible for developing and implementing the TDM Plan described in the "Transportation Demand Management" section. The TDM Plan must be approved by both the City of Redwood City and C/CAG prior to City approval of any development agreement.	Mitigation measure fully implemented by others, and no further related improvements are planned. Implementation or fair share contribution by the Project Applicant is no longer required.  Project Applicant or designee	Submit TDM Plan and annual TDM monitoring plan for review and approval by the City of Redwood City  Submit annual TDM monitoring reports	City of Redwood City – Transportation Division to review and approve plan  To conduct annual monitoring	Mitigation measure Completed.  Prior to issuance of first building permit for the Project  Ongoing, annually

**TABLE 8-1 (CONTINUED)  
HARBOR VIEW PROJECT MITIGATION MONITORING AND REPORTING PROGRAM**

Impact	Mitigation Measure	Implementation Responsibility	Action	Monitoring Party	Monitoring Schedule
– PM peak hour					
<p><b>Impact TRANS-29:</b> Under Cumulative Plus Project Conditions, the Project would result in the addition of traffic volumes representing more than five percent of the ramp's capacity to the northbound US 101 Off-Ramp to Woodside Road and southbound US 101 On-Ramp from Woodside Road, which already exceed the ramp capacity in the AM and PM peak hours, respectively under Cumulative Plus Project Conditions.</p>	<p><b>Mitigation Measure TRANS-29:</b> The Project applicant shall contribute its fair-share contribution to improvements to add capacity at the Woodside Road ramps and improvements to the US 101/SR 84 interchange pursuant to the US 101/SR 84 Interchange Improvement Project. The City shall ensure that the required fair-share payment has been submitted prior to issuance of the first building permit for the Project.</p> <p>(The US 101/SR 84 Interchange Improvement Project is under Caltrans's control with uncertain funding and is therefore not guaranteed to be constructed.)</p>	Project Applicant or designee	Contribute required fair-share contribution	City of Redwood City – Transportation Division to ensure submittal of required fair-share payment	Prior to issuance of first building permit for the Project
<p><b>Impact TRANS-33:</b> Under Cumulative Plus Project Conditions, the Project would considerably contribute to inadequate emergency access.</p>	<p><b>Mitigation Measure TRANS-33:</b> Prior to receiving the certificate of occupancy, the Project applicant shall install emergency vehicle pre-emption equipment at the intersection of Maple Street/Veterans Boulevard to the satisfaction of the City.</p>	Project Applicant or designee Construction contractor(s)	Develop and submit to the City for approval a construction management plans	City of Redwood City – Transportation Division to confirm submittal and review plan	Prior to issuance of first building permit for the Project