

# Summary Form for Electronic Document Submittal

**Form F**

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2021080447

Project Title: 505 E. Bayshore Road Project

Lead Agency: City of Redwood City

Contact Name: Curtis Banks

Email: cbanks@redwoodcity.org Phone Number: (650) 780-7363

Project Location: Redwood City San Mateo  
*City* *County*

Project Description (Proposed actions, location, and/or consequences).

The project proposes to demolish the existing development on the site to construct 56 townhouses, of which 51 would be base density units and five would be bonus density units. Eight of the units would be sold below market rate at a price point affordable to moderate income households. The townhouses would consist of two-, three-, and four-bedroom units, ranging from roughly 1,200 square feet to roughly 1,700 square feet in size. The units would be divided between nine buildings which would be three-story wood-framed structures on top of at-grade concrete foundations. In total, the buildings would provide 89,674 square feet of gross floor area.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

- Air quality impacts during construction: mitigation via implementation of best management practices and specified equipment emissions standards to reduce criteria pollutants and health risks
- Biological resources impacts: mitigation via pre-construction surveys and compensatory mitigation.
- Hazardous materials impacts: mitigation via preparation and implementation of a Site Management Plan
- Transportation impacts: mitigation via an approved transportation demand management and annual monitoring plan to reduce vehicle miles traveled, and incorporation of a bike land along the project frontage.

See attached EIR Summary for additional details.

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Concerns raised in responses to the NOP included aesthetics, biological resources, hydrology and water quality, hazards and hazardous materials, greenhouse gas emissions, transportation, and tribal cultural resources.

Provide a list of the responsible or trustee agencies for the project.

California Department of Fish and Wildlife  
California Department of Transportation  
San Francisco Bay Conservation and Development Commission  
Airport Land Use Committee  
San Francisco Bay Regional Water Quality Control Board

## SUMMARY

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The 2.54-acre project site is located at 505 E. Bayshore Road in Redwood City. The site is currently developed with several corrugated metal warehouse buildings and outdoor storage facilities associated with an existing industrial facility. The remainder of the site is an undeveloped vacant lot.

The project proposes to demolish the existing development on the site to construct 56 townhouses, of which 51 would be base density units and five would be bonus density units. Eight of the units would be sold below market rate at a price point affordable to moderate income households. The townhouses would consist of two-, three-, and four-bedroom units, ranging from roughly 1,200 square feet to roughly 1,700 square feet in size. The units would be divided between nine buildings which would be three-story wood-framed structures on top of at-grade concrete foundations. In total, the buildings would provide 89,674 square feet of gross floor area. The buildings would reach maximum heights of 38 feet and would be setback at least 29 feet from the northern property line, 10 feet from the eastern property line, and 11 feet from the southern and western property lines. The project proposes 28,714 square feet of common open space, including an amenity area for residents on the eastern portion of the site.

The City's General Plan designates the project site as Commercial Regional, and the site is zoned CG – Commercial General. The project proposes a General Plan Amendment to Mixed Use – Waterfront Neighborhood and a rezoning to MUWF – Mixed Use Waterfront. Development standards for the Mixed-Use Waterfront Neighborhood designation permit a maximum residential density of 40 dwelling units per acre.

### Significant Impacts and Mitigation Measures

The following table is a brief summary of the significant environmental impacts of the project identified and discussed within the text of the Environmental Impact Report (EIR), and the mitigation measures proposed to avoid or reduce those impacts. Refer to the main body text of the EIR for detailed discussions of the environmental setting, impacts, and mitigation measures. Alternatives to the proposed project are also summarized at the end of this section.

The project would not result in any significant unavoidable impacts.

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#### Summary of Impacts and Mitigation Measures

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| Impact   | Mitigation Measures  |
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| <b>Air Quality</b>   |  |
| <b>Impact AIR-1:</b> Construction activities associated with the proposed project would expose sensitive receptors near the project site to Toxic Air Contaminant emissions in excess of the BAAQMD cancer risk threshold of >10 cases per million and annual PM2.5 concentration threshold of 0.3 µg/m <sup>3</sup> . | <b>MM AIR-1.1:</b> Prior to issuance of any demolition, grading, and/or building permits (whichever occurs earliest), the project applicant shall submit a construction operations plan to the Director of Community Development & Transportation or the Director's designee that includes specifications of the equipment to be used during construction. The plan shall be accompanied by a letter signed by an air quality specialist, verifying that the equipment |

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## Summary of Impacts and Mitigation Measures

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| Impact   | Mitigation Measures  |
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| <b>(Less than Significant Impact with Mitigation Incorporated)</b> | <p>included in the plan meets the standards set forth below.</p> <ul style="list-style-type: none"><li>• All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall, at a minimum, meet U.S. EPA Tier 4 final emission standards for particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).<ul style="list-style-type: none"><li>○ If Tier 4 equipment is not available, all construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 70 percent or greater reduction in particulate matter exhaust in comparison to uncontrolled equipment.</li></ul></li><li>• Use of alternatively fueled or electric equipment.</li></ul> <p>Alternatively, the project applicant could develop a plan that reduces on- and near-site construction emissions by a minimum 60 percent or greater. The construction operations plan shall be reviewed and approved by the Director of Community Development &amp; Transportation or the Director's designee prior to the issuance of any demolition, grading, or building permits (whichever occurs earliest).</p> |

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**Impact AIR-C:** The project would not result in a cumulatively considerable contribution to a significant air quality impact.

**(Less than Significant Cumulative Impact with Mitigation Incorporated)**

See **MM AIR-1.1** above.

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**Summary of Impacts and Mitigation Measures**

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| <b>Impact</b>  | <b>Mitigation Measures</b>   |
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|  | <b>Biology</b>   |
| <p><b>Impact BIO-1:</b> Construction activities could impact common native nesting birds and special-status birds such as Alameda Song Sparrow and White-Tailed Kite.</p> <p><b>(Less than Significant Impact with Mitigation Incorporated)</b></p>  | <p><b>MM BIO-1.1:</b> For the protection of special-status birds and native nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF), future project construction activities shall occur from September 1 – January 31 (inclusive) outside of the nesting season, to the extent feasible.</p> <p>If work cannot be scheduled to occur outside of the nesting season, and project construction activities (grading, staging, etc..) are initiated during the nesting season (February 1 – August 31, inclusive), a qualified wildlife biologist shall conduct a nesting bird survey no more than 14 days prior to the start of project construction activities, such as grading or staging, and prior to issuance of any grading permit. If no active nests are identified during the surveys, no impacts will occur to birds and work shall progress without restriction. If active nests are identified, a no-disturbance buffer around the nest shall be implemented to avoid impacts to nesting birds. Buffers shall be determined by a qualified biologist, and typically range from 25 feet to 500 feet depending on the species, nest location, and protection status of that species. After an active nest is determined to no longer be active, because of young fledging or predation, the buffer around the nest shall be removed and work shall progress without restriction.</p> |
| <p><b>Impact BIO-2:</b> Artificial lighting could have a potentially significant impact on local wildlife populations due to the high ecological value of these adjacent habitat areas and the rarity of some of the species inhabiting these areas.</p> <p><b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p><b>MM BIO-2.1: <u>Shielding of Lights.</u></b> All exterior lighting on the project site will be shielded to block illumination from shining upward, or northward into the muted tidal drainage ditch, unnamed tidal slough, and Inner Bair Island to the north. The lit portion of light fixtures (i.e., the illuminants) shall be shielded from view to fish, birds, or mammals in the tidal marsh or muted tidal ditch. The project’s lighting plan shall be reviewed and approved by the Redwood City Planning Division for compliance prior to issuance of a building permit.</p> <p><b>MM BIO-2.2: <u>Orientation of Lights.</u></b> Lights installed will be directed downward and, in the northern part of the project site, inward toward the project site (away from marsh habitats to the north), in order to limit the amount of light spilling into natural areas outside of the project site and preventing animals in those</p>  |

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## Summary of Impacts and Mitigation Measures

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| Impact   | Mitigation Measures  |
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|  | <p>sensitive habitats from being exposed to glare/luminance from the light fixtures. The project's lighting plan shall be reviewed and approved by the Redwood City Planning Division for compliance prior to issuance of a building permit.</p> <p><b>MM BIO-2.3: <u>Minimize Exterior Lighting.</u></b> All exterior lighting used on the project site shall be Dark Sky Approved<sup>1</sup> lighting. The project shall include the installation of motion-sensor lighting and automatic light shut-off mechanisms. No red exterior lighting shall be used on the project site.</p>  |
| <p><b>Impact BIO-3:</b> Project activities may result in the injury or mortality of salt marsh harvest mice and salt marsh wandering shrews.</p> <p><b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p><b>MM BIO-3.1: <u>Worker Environmental Awareness Program.</u></b> Before any construction activities begin, a qualified biologist will conduct a training session for all construction personnel. At a minimum, the training will include descriptions of the salt marsh harvest mouse and salt marsh wandering shrew, their habitats, the laws protecting them, the general measures that are being implemented to conserve these species as they relate to the project, and the boundaries within which the project may be accomplished.</p> <p><b>MM BIO-3.2: <u>Exclusion Barrier.</u></b> Prior to the start of construction activities below top of bank, a barrier will be installed along the northernmost limits of the work area to exclude salt marsh harvest mice and salt marsh wandering shrews from the project site. This barrier, which will be shown on the project plans and will be constructed under the guidance of a qualified biologist, will consist of a three-foot tall, tight cloth, smooth plastic, or sheet-metal (or similar material approved by the USFWS) fence toed into the soil at least three inches deep and supported with stakes placed on the inside of the barrier. A qualified biologist will conduct a preconstruction survey of the area where vegetation was removed prior to construction access, and will monitor the installation of the barrier. Following the installation of the barrier, designated construction personnel will check its integrity each morning that construction activities occur, and will initiate repairs immediately as needed.</p> |

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<sup>1</sup> Exterior lighting fixtures that meet the International Dark-Sky Association's standards for artificial lighting minimize glare while reducing light trespass and skyglow, and are required to be fully shielded and minimize the amount of blue light in the nighttime environment (Source: International Dark-Sky Association. 2020)

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## Summary of Impacts and Mitigation Measures

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| Impact   | Mitigation Measures  |
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|  | <p><b>MM BIO-3.3: <u>Environmentally Sensitive Area Fencing.</u></b> Within the banks of the muted tidal drainage ditch, the project limits will also be clearly demarcated with Environmentally Sensitive Area fencing to avoid inadvertent disturbance of any habitat outside of the designated construction area during construction activities. This fencing can be combined with the exclusion barrier but must not be outside that barrier.</p> <p><b>MM BIO-3.4: <u>Immediate Work Stoppage.</u></b> If a salt marsh harvest mouse or salt marsh wandering shrew, or an animal that could be a harvest mouse or wandering shrew (e.g., a similar species of mouse or shrew), is observed on the project site during project activities, all work that could result in the injury or death of the individual will stop immediately and the qualified biologist will be immediately notified. The animal will be allowed to leave the area on its own and will not be handled.</p>  |
| <p><b>Impact BIO-4:</b> Project activities may result in the introduction of invasive weeds during and following project construction which could lead to degradation of muted tidal marsh habitat. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p><b>MM BIO-4.1: <u>Implement Invasive Weed Best Management Practices.</u></b> The invasion and/or spread of noxious weeds will be avoided by the use of the following invasive weed best management practices:</p> <ul style="list-style-type: none"><li>• The use of moderate or highly invasive and/or noxious weeds (as defined by California Department of Food and Agriculture) for landscaping is prohibited.</li><li>• During project construction, all seeds and straw materials used on-site will be weed-free rice (or similar material acceptable to the City), straw, and all gravel and fill material will be certified weed-free to the satisfaction of the City. Any deviation from this will be approved by the City.</li><li>• During project construction, vehicles and all equipment will be washed (including wheels, undercarriages, and bumpers) before entering the proposed project footprint. Vehicles coming to the site will be cleaned at existing construction yards or legally operating car washes.</li><li>• Following construction of the project, a standard erosion control seed mix (acceptable to the City) from a local source will be planted</li></ul> |

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**Summary of Impacts and Mitigation Measures**

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| <b>Impact</b>   | <b>Mitigation Measures</b>  |
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|   | within the temporary impact zones on any disturbed ground that will not be under hardscape, landscaped, or maintained. This will minimize the potential for the germination of the majority of seeds from non-native, invasive plant species.   |
| <b>Impact BIO-5:</b> The project would result in the permanent loss of muted tidal marsh habitat, which is potential habitat for salt marsh harvest mice and salt marsh wandering shrews.<br><b>(Less than Significant Impact with Mitigation Incorporated)</b> | <b>MM BIO-5.1: <u>Compensatory Mitigation.</u></b> For permanent impacts to 0.04 acres of muted tidal marsh, the project applicant will provide compensatory migration for impacts to habitat of the salt marsh harvest mouse. Mitigation may be satisfied through project-specific conservation and management of suitable habitat occupied by these species and/or the purchase of credits at a conservation bank that has been approved by the City and CDFW. The conservation bank does not necessarily need to be approved for salt marsh harvest mouse mitigation as long as it provides suitable habitat for the species in an area expected to support the species (e.g., the San Francisco Bay Tidal Wetlands Bank in Redwood City would be appropriate).<br><br>If compensatory mitigation is provided through project-specific conservation and management of suitable habitat, the project applicant will provide the mitigation at a 2:1 (mitigation: impact) ratio on an acreage basis for permanent impacts to suitable habitat. If compensatory mitigation is provided through the purchase of credits at an approved conservation bank, mitigation will be provided at a 1:1 (mitigation: impact) ratio for permanent impacts.<br><br>If the project applicant provides mitigation through project-specific conservation and management of suitable habitat, the project applicant will prepare a Habitat Mitigation and Monitoring Plan describing the proposed mitigation lands for conservation/management, and monitoring that will occur to ensure that those lands continue to provide suitable habitat conditions. If the mitigation lands are suitable for multiple species and habitats, then the project applicant may rely on such lands to mitigate impacts to multiple species and habitats. The Habitat Mitigation and Monitoring Plan will be prepared by a qualified ecologist and will include the following: |

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**Summary of Impacts and Mitigation Measures**

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| <b>Impact</b>   | <b>Mitigation Measures</b>   |
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|   | <ul style="list-style-type: none"> <li>• A summary of habitat impacts and proposed acres of habitat conservation;</li> <li>• The location of habitat conservation and enhancement site(s), and description of existing site conditions;</li> <li>• A monitoring plan (including performance criteria, methods, data analysis, reporting requirements, and schedule). At a minimum, performance/success criteria will include demonstration of the presence of suitable habitat for the salt marsh harvest mouse, and no more than five percent invasive species by cover by year five.</li> </ul> <p>The project applicant will also ensure adequate resources, including funding to implement the mitigation, maintenance, and monitoring of the mitigation lands.</p> <p>If compensatory mitigation is provided through a purchase of mitigation credits, the project applicant will purchase the credits from a conservation bank in consultation with the appropriate resource agencies prior to commencement of project construction.</p> |
| <p><b>Impact BIO-6:</b> The project could result in an impact to salt marsh harvest mice and salt marsh wandering shrews from an increase in predation due to increased available food waste, an increase in outdoor pets, and/or the presence of one or more feral cat feeding station(s).<br/> <b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p><b>MM BIO-6.1:</b> <u>Prohibit Outdoor Cats and Off-Leash Dogs.</u> Outdoor cats and off-leash dogs will be prohibited on the property following project construction. This measure will be incorporated into the covenants, conditions &amp; restrictions (CC&amp;Rs) for the project and enforced by the property’s homeowners association.</p> <p><b>MM BIO-6.2:</b> <u>Food Waste Management.</u> The CC&amp;R’s for the project shall include the following measures to minimize impacts on salt marsh harvest mice and salt marsh wandering shrews due to the attraction of nuisance predators to the project site:</p> <ul style="list-style-type: none"> <li>• Any bins used for food waste shall include lids that seal tightly to prevent access by animals and incorporate a mechanism to prevent them from being inadvertently left open when not in active use.</li> <li>• Outdoor trash and recycling receptacles shall be routinely emptied throughout the day by the janitorial service, thus ensuring that cans</li> </ul> |

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## Summary of Impacts and Mitigation Measures

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| Impact | Mitigation Measures  |
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|        | <p>do not fill up and allow food waste to spill out.</p> <ul style="list-style-type: none"><li>• The homeowners association shall ensure that any litter on the site is picked up daily, and no food trash is left on-site overnight.</li><li>• Signs shall be placed on trash and recycling receptacles reminding users to close the lids so that they will not be inadvertently left open.</li><li>• Signs shall be placed informing residents and visitors to not feed feral or wild mammals, including feral cats, on the property.</li><li>• Educational signs shall be posted explaining the importance and sensitivity of nearby marsh habitats, prohibiting feeding wildlife (including feral cats) on the property, and prohibiting outdoor cats and off-leash dogs. In addition, signs will advise residents and visitors to dispose of food waste in outdoor areas appropriately to avoid attracting and subsidizing nuisance species.</li></ul> <p>This measure will be incorporated into the covenants, conditions &amp; restrictions (CC&amp;Rs) for the project and enforced by the property's homeowners association. The homeowners association would provide an annual report documenting the project's compliance with this mitigation measure to the Department of Community Development and Transportation for approval. The report will include photo documentation with timestamps and written documentation.</p> |

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**Impact BIO-C:** The project would not result in a cumulatively considerable contribution to a significant biological resources impact.

**(Less than Significant Cumulative Impact with Mitigation Incorporated)**

See **MM BIO-1.1 – 6.2** above.

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**Summary of Impacts and Mitigation Measures**

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**Impact**

**Mitigation Measures**

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**Hazards and Hazardous Materials**

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**Impact HAZ-1:** The project could expose construction workers to hazardous materials associated with contaminated fill on the site. **(Less than Significant Impact with Mitigation Incorporated)**

**MM HAZ-1.1:** Prior to the issuance of a demolition permit and before any substantial ground disturbance, the applicant shall hire a qualified environmental professional to prepare a Site Management Plan (SMP) for the project site. The SMP, and any remedial actions required as part of it, shall be implemented by the applicant and its contractors to the satisfaction of the relevant oversight agencies (City of Redwood City Fire Department, San Francisco Bay Regional Water Quality Control Board (RWQCB), and/or San Mateo County or State Department oversight agency, or other appropriate agency having jurisdiction) to ensure sufficient minimization of risk to human health and the environment is completed. At a minimum, the SMP shall:

1. Establish minimum requirements for worker training and site-specific health and safety plans, to protect the general public and workers in the construction area (note: these requirements and all previous environmental sampling results shall be provided by the applicant to all contractors, who shall be responsible for developing their own construction worker health and safety plans and training requirements).
  2. Establish appropriate site-specific cleanup targets for site soils that are protective of human health and the environment, based on the proposed future land uses(s). At a minimum, these targets shall be equal to, or more protective than the RWQCB ESLs for Residential Use; or in the case of contaminants that have naturally occurring background levels that exceed the residential ESLs, the target shall be equal to, or more protective than, the regional background level for that contaminant.
  3. Identify and implement measures such as excavation, containment, or treatment of the contaminated soils to achieve the plan's cleanup targets, and/or to provide protection of future site users from exposure to
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## Summary of Impacts and Mitigation Measures

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### Impact

### Mitigation Measures

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remaining soil (if any) that exceed the plan's clean-up targets, including:

- a. Description of post-excavation confirmation sampling requirements. If residual contamination remains at the site above the site-specific cleanup targets, include appropriate controls, including institutional controls where and if necessary, to assure that activities by future users do not expose them to unacceptable health and safety risks. Such controls may include, but are not limited to, visual barriers over contaminated soil, followed by a cap of clean soil or hard surface materials; operation and maintenance protocols for any disturbance of contaminated soils; and recording of deed restrictions, such as activity and use limitations, with the San Mateo County Recorder's Office to assure that the remedy is maintained.
  - b. If excavated soils are to be reused on-site, characterization shall be undertaken to determine that such materials do not exceed the established cleanup targets for the site, or that such reused materials are subject to appropriate controls, as described in the bullet point above for addressing residual contamination.
  - c. If excess materials are off-hauled, waste profiling of the material shall be completed and documented. Materials classified as nonhazardous waste shall be transported under a bill of lading. Materials classified as hazardous waste shall be transported under a hazardous waste manifest. All materials shall be disposed of at an appropriately licensed landfill or facility.
  - d. Trucking operations shall comply with the California Department of Transportation and any other applicable regulations, and all trucks shall be
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## Summary of Impacts and Mitigation Measures

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| Impact | Mitigation Measures  |
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|        | <p>licensed and permitted to carry the appropriate waste classification. The tracking of dirt by trucks leaving the project site shall be minimized by cleaning the wheels on exiting and cleaning the loading zone and exit area as needed.</p>   |
|        | <ol style="list-style-type: none"><li data-bbox="797 543 1414 821">4. Establish procedures for dewatering of construction excavations and/or dewatering of excavated sediments prior to off-hauling (if required), consistent with federal, state, and local regulations, specifying methods of water collection, handling, transport, treatment, discharge, and disposal for all water produced by dewatering activities.</li><li data-bbox="797 848 1403 1157">5. Identify measures to protect future site users from contact with contaminants in groundwater. Such measures may include operation and maintenance protocols for any disturbance of groundwater, and recording of deed restrictions, such as activity and use limitations, with the San Mateo County Recorder's Office to assure that the implemented remedy(ies) is maintained.</li><li data-bbox="797 1184 1414 1948">6. Include contingency measures to address unanticipated conditions or contaminants encountered during construction and development activities. The contingency measures shall establish and describe procedures for responding in the event that unanticipated subsurface hazards or hazardous material releases are discovered during construction, including appropriately notifying nearby property owners, schools, and residents, and following appropriate site control procedures. Control procedures would include, but not be limited to further investigation; and if necessary, remediation of such hazards or releases, including off-site removal and disposal, containment, or treatment. If unanticipated subsurface hazards or hazardous material releases are discovered during construction, the contingency measures addressing unknown contaminants shall be followed. The contingency measures shall be amended as necessary if new information</li></ol> |

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**Summary of Impacts and Mitigation Measures**

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| <b>Impact</b> | <b>Mitigation Measures</b>  |
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|               | becomes available that could affect implementation of the measures. |

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| <p><b>Impact HAZ-2:</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.</p> <p><b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p>See <b>MM HAZ-1.1</b> above.</p> |
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| <p><b>Impact HAZ-C:</b> The project would not result in a cumulatively considerable contribution to a significant hazards and hazardous materials impact.</p> <p><b>(Less than Significant Cumulative Impact with Mitigation Incorporated)</b></p> | <p>See <b>MM HAZ-1.1</b> above.</p> |
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**Transportation**

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| <p><b>Impact TRN-1:</b> The project would conflict with adopted plans for bicycle lanes on E. Bayshore Road.</p> | <p><b>MM TRN-1.1:</b> The project shall redesign proposed on-street improvements along the project frontage to incorporate the planned bicycle lanes on E. Bayshore Road. The revised plans shall be submitted to the Director of the Community Development and Transportation Department for review and approval prior to issuance of the first building permit for the project.</p> |
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| <p><b>Impact TRN-2:</b> The project generated home-based VMT per capita is 13.4, which is greater than the threshold of 10.5 for residential uses. Without measures to reduce VMT, the project would have a significant impact based on the project generated VMT. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p> | <p><b>MM TRN-2.1:</b> The project shall develop and implement a TDM plan sufficient to demonstrate that VMT associated with the project is reduced to a level less than or equal to 10.5 miles per capita. The following measures represent a feasible method for achieving the required VMT reduction:</p> <ol style="list-style-type: none"> <li>1. On-site information</li> <li>2. New resident orientation</li> <li>3. Annual promotion of TDM measures</li> <li>4. Bike racks for visitors</li> <li>5. Indoor bike parking for residents</li> <li>6. Land/facilities for pedestrian/bike connections</li> <li>7. Free annual Caltrain/SamTrans passes</li> </ol> |
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**Summary of Impacts and Mitigation Measures**

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**Impact**

**Mitigation Measures**

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The TDM plan shall be submitted to and approved by the Community Development and Transportation Department, and shall be monitored annually to gauge its effectiveness in meeting the required VMT reduction. A transportation professional working at the City's direction and pursuant to a scope of work approved by the City Engineer shall conduct traffic counts annually to measure the daily and peak-hour entering and exiting vehicle volumes. The volumes will be compared to benchmarks established by the transportation professional and the City Engineer to determine whether the necessary reduction in vehicle trips is being met. In addition to monitoring driveway volumes, a survey will be developed by the transportation professional to determine actual mode splits for employees and patrons of the fitness center. The survey will also gather information on usage of individual TDM plan components. The results of the annual vehicle counts and survey will be reported in writing by the transportation professional to the Community Development and Transportation Department.

If TDM plan monitoring results show that the trip reduction targets are not being met, the TDM plan shall be updated to identify replacement and/or additional feasible TDM measures to be implemented. The updated TDM plan shall be subject to the same approvals and monitoring requirements listed above.

If monitoring and reporting demonstrates that the project is non-compliant (i.e, did not fulfill the requirements of the TDM plan, meet the drive-alone reduction targets, etc.), the City as the enforcing agency may impose penalties including fines and/or permit limitations.

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**Impact TRN-C:** The project would not result in a cumulatively considerable contribution to a significant transportation impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

See **MM TRN-2.1** above.

## Project Alternatives

The California Environmental Quality Act (CEQA) requires that an EIR identify alternatives to a project as it is proposed. The CEQA Guidelines specify that the EIR should identify alternatives which “would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project.” The purpose of this section is to determine whether there are alternatives of design, scope, or location which would substantially lessen the significant impacts, even if those alternatives “impede to some degree the attainment of the project objectives” or are more expensive (Section 15126.6).

While CEQA does not require that alternatives be capable of meeting all of the project objectives, their ability to meet most of the objectives is considered relevant to their consideration. The stated objectives of the project applicant are to:

- Redevelop the 2.54-acre site to allow for the creation of a residential waterfront project.
- Construct up to 56 residential units, including eight moderate below market rate units, in nine buildings.
- Provide pedestrian and bicycle circulation around and through the site.
- Enhance public connectivity to the Bay Trail by providing a new public trail segment.
- Provide a high-quality residential project to help improve the regional and Redwood City jobs/housing balance.
- Include sustainability features that help meet Redwood City sustainability goals.
- Provide for-sale housing (with affordable for-sale housing) to create opportunities for home ownership and community building.
- Locate housing outside of the Downtown area.
- Provide active recreation area, paths, boardwalk and amenities along the waterfront to increase Bay Trail resiliency.

The City of Redwood City has developed the following project objectives:

- Provide a high-quality residential project to help improve the regional and Redwood City jobs/housing balance.
- Include sustainability features that help meet Redwood City sustainability goals.
- Provide for-sale housing (with affordable for-sale housing) to create opportunities for home ownership and community building.
- Locate housing outside of the Downtown area.
- Provide active recreation area, paths, boardwalk and amenities along the waterfront to increase Bay Trail resiliency.

## Project Alternatives Considered but Rejected

The following alternative was considered for the project but rejected.

### *Location Alternative*

There is no rule requiring an EIR to explore off-site project alternatives in every case. As stated in the Guidelines: "An EIR shall describe a range of reasonable alternatives to the project, or (emphasis added) to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." (Guidelines, § 15126.6, subd. (a), italics added.) As this implies, "an agency may evaluate on-site alternatives, off-site alternatives, or both." (Mira Mar, supra, 119 Cal.App.4th at p. 491.). The Guidelines thus do not require analysis of off-site alternatives in every case. Nor does any statutory provision in CEQA "expressly require a discussion of alternative project locations." (119 Cal.App.4th at p. 491 citing §§ 21001, subd. (g), 21002.1, subd. (a), 21061.)

In considering an alternative location in an EIR, the CEQA Guidelines advise that the key question is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location". The proposed project is a high-residential development on East Bayshore Road. It is not likely that an alternative location within this area of Redwood City would substantially lessen the identified impacts, other than those related to biological resources. A site not near the bay and tidal habitats would likely avoid the project's impacts to biological resources and avoid the need for mitigation noted above. As a private development project proposed by a private applicant, the consideration of alternative locations is tempered by the fact the applicant has control over the current proposed site, and may not be able to obtain control of another location, unlike a public agency, which may employ eminent domain to acquire a site. For these reasons, an alternative location is not considered further.

## Project Alternatives Considered for Further Analysis

### *No Project Alternative*

The CEQA Guidelines [Section 15126(d)4] require an EIR specifically include a "No Project" alternative. The purpose of including a No Project alternative is to allow decision-makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project alternative is "what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistent with available infrastructure and community services." [Section 15126.6(e)(2)] The Guidelines emphasize that an EIR should take a practical approach, and not "...create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment [Section 15126.6(e)(3)(B)]."

*No Project – No Development Alternative:* The No Project – No Development Alternative would retain the existing industrial development on the site. If the project site were to remain as is, there would be no new impacts.

Implementation of the No Project – No Development alternative would avoid the less than significant impacts with mitigation identified in this EIR. The No Project No-Development alternative would not, however, allow for new waterfront residential development to be constructed on the project site. A project without residential development would not address RHNA needs or address the City Council’s strategic priority for housing. This alternative does not meet any of the objectives of the proposed project.

*No Project- Existing Plans and Policies Alternative:* The No Project-Existing Plans and Policies Alternative would assume the currently proposed project is not approved, and a different project is proposed based on what the General Plan currently allows.

The project site is designated as *RC-Commercial Regional* under the City of Redwood City’s General Plan adopted in 2010. The *RC-Commercial Regional* designation provides opportunities for general retail, commercial services, restaurants, lodging, vehicle sales and service, commercial recreation, professional offices, medical and financial institutions, and other similar business activities. Representative development forms include large retail centers anchored by one or more major tenants, large stand-alone retail stores, hospitality uses, and automobile dealerships. Uses specifically prohibited include commercial warehousing, mini-storage, trucking and transportation-related uses, and heavy manufacturing. The maximum FAR is 1.0, and the maximum height is five stories within the U.S. 101 corridor and three stories in all other locations.

An alternative project that is consistent with the General Plan would allow for commercial development on the property. The alternative project could potentially be similar in scale to or larger than the proposed development, as allowed under the General Plan. Based on allowed development capacities on the site, an alternative project could construct up to 110,640 square feet of commercial uses, which would result in a greater level of development than the proposed project.

The environmental effects of redevelopment the site with a different development project consistent with the General Plan would likely result in similar construction and operational effects as the proposed project. To the extent more intense development were to be proposed beyond what is currently pending with the subject project application, construction and operational effects could be increased. Additionally, this alternative would not provide affordable housing to the City.

Implementation of the existing plans and policies “No Project” alternative would not avoid the less than significant impacts with mitigation identified in this EIR.

#### *Design Alternative – Removal of Cantilevered Portions of Public Trail*

The project proposes to construct a public trail along the northern boundary of the site, providing access between E. Bayshore Road and a planned public trail segment to be located on the adjacent property to the east. As described in Section 3.4 Biological Resources, portions of the trail would be cantilevered to overhang 0.04 acres (or roughly 1,742 square feet) of muted tidal marsh habitat. Although these portions of the trail would not result in direct impacts to the habitat from grading or construction activities, shading from the cantilevered structures would result in long-term degradation of this habitat, which provides potential foraging habitat for salt marsh harvest mice and salt marsh wandering shrews. This habitat is of low quality due to its small size and isolation from higher quality marsh habitats to the north, but it is possible that individual salt marsh harvest mice

and salt marsh wandering shrews occur here. Due to the rarity of the salt marsh harvest mouse and salt marsh wandering shrew, project impacts to their habitat would be considered significant, even though the existing habitat is of low quality.

This project alternative would redesign the proposed public trail to eliminate any cantilevered structures overhanging the muted tidal marsh habitat. The cantilevered structures are primarily associated with two “nodes” intended as observation areas or other passive recreational use by trail users, as well as a small portion of the trail itself near the project’s western boundary (refer to Figures 2.0-4 and 3.4-1). Eliminating the cantilevered structures would avoid the impact to muted tidal marsh habitat. It should be noted that this impact would be reduced to a less than significant level under the currently proposed project with implementation of mitigation measures (MM BIO-5.1).

This alternative would still meet all project objectives, but would reduce passive recreational opportunities for users of the trail by eliminating areas for resting, gathering, and viewing the San Francisco Bay. Additionally, removing the cantilevered portions of the trail may require a reduction to the width of the trail in some locations, which could result in inconsistencies with BCDC requirements for trail design.

Implementation of the Design Alternative – Removal of Cantilevered Portions of the Public Trail would avoid the need to mitigate impacts to muted tidal marsh habitat. All other impacts of the project would remain the same.

#### *Reduced Scale Alternative*

The majority of the project’s impacts are a result of general development activity that would occur with nearly any project on the site, regardless of size (Impacts BIO-1 through BIO-4, Impact BIO-6, and Impacts HAZ-2 and HAZ-2). However, impacts related to VMT (Impact TRN-2) and construction air quality emissions (Impact AIR-2) could potentially be reduced by reducing the scale of the project. To reduce these impacts and potentially avoid the need for mitigation, a reduced scale alternative is considered.

The Redwood City Transportation Analysis Manual identifies certain projects that would be assumed to have a less than significant VMT impact based on suggestions from the State of California’s Office of Planning and Research (OPR) Technical Advisory (December 2018, pages 13-15). “Small projects”, defined as generating 150 or fewer average daily vehicle trips, can be assumed to result in a less than significant VMT impact. The City’s Transportation Analysis Manual identifies the screening threshold for multi-family residential projects as roughly 20 units. Reducing the scale of the project to 20 or fewer units, therefore, would place the project below the City’s screening threshold, avoiding the need to mitigate the project’s VMT impacts. It should be noted that this impact would be reduced to a less than significant level under the currently proposed project with implementation of mitigation measures (MM TRN-2.1).

While reducing the scale of the project would reduce construction activity to a certain extent, the phases of construction requiring the heaviest equipment (therefore resulting in the greatest emissions), such as site grading, would still be required to a similar extent as the proposed project. Mitigation measures similar to those identified for the proposed project (MM AIR-2.1), which

require the use of low-emitting construction equipment, would still be required to reduce impacts to less than significant levels.

Because less space would be needed to accommodate the lower number of proposed units, reducing the scale of the project would likely allow for a redesign of the proposed public trail in a manner that would remove the need for cantilevering, therefore avoiding the impact to 0.04 acre (or roughly 1,742 square feet) of muted tidal marsh habitat.

Implementation of Reduced Scale Alternative would avoid the need for mitigation for project-related VMT impacts and may avoid impacts to muted tidal marsh by allowing for a redesign of the proposed public trail. However, this alternative would still be required to implement mitigation measures for all other identified impacts on the site. This alternative would meet most of the project objectives, albeit to a lesser degree than the proposed project. However, this alternative would reduce the amount of housing to be provided in the City, including a potential reduction in the amount of proposed affordable housing.

### **Known Views of Local Groups and Areas of Controversy**

Concerns raised in responses to the NOP included aesthetics, biological resources, hydrology and water quality, hazards and hazardous materials, greenhouse gas emissions, transportation, and tribal cultural resources.