INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

888 BRANSTEN ROAD PROJECT

PREPARED FOR:

City of San Carlos

PLANNING DIVISION
600 ELM STREET
SAN CARLOS, CA 94070

PREPARED BY:

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INTRODUCTION TO THIS DOCUMENT

This document serves as the Initial Study/Mitigated Negative Declaration for the 888 Bransten Road project ("project"). Full project application materials are available from the City of San Carlos Planning Division for review upon request.

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

This document is organized in three sections as follows:

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

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

Standard Conditions

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

PUBLIC REVIEW

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

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

PROJECT INFORMATION

All figures for the project information are included together on pages 5 through 10.

PROJECT ENTITLEMENTS

Development of the project will require the following approvals from the City of San Carlos: Design Review Permit, Lot Merger, Grading and Dirt Haul Certificate, Exception to Loading Space Requirement to allow two rather than 3 loading spaces, Minor Use Permit for Shared Off-Site Parking, Removal of 6 "Significant" Trees, Conditional Use Permit for Height Exceptions for Roof Features, and acceptance of a Transportation Demand Management Plan.

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

LEAD AGENCY

City of San Carlos
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San Carlos, CA 94070

CONTACT PERSON

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PROJECT SPONSOR

ARE-San Francisco No. 93, LLC
Contact: Terezia Nemeth/Dan Tsang
26 N. Euclid Avenue, Pasadena, CA 91101
Phone: 1-650-759-2859
Email: dtsang@are.com

PROJECT LOCATION

The approximately 2.26-acre project site is located at 814 – 870 Bransten Road and 797 Industrial Road, in the City of San Carlos, in San Mateo County. The assessor's parcel numbers (APNs) are 046-100-060, -270, and -280. **Figure 1** shows the project location.

GENERAL PLAN DESIGNATION / ZONING

Planned Industrial / Heavy Industrial (IH)

EXISTING USES

The project site is currently developed with three industrial buildings, 814 - 870 Bransten Road (49,485 square feet) and 797 Industrial Road (7,415 square feet), totaling 56,900 square feet. The two buildings located at 814 - 870 Bransten consist of various multi-tenant spaces (currently or recently occupied by retail, fabrication, auto stereo repair and installation, and wholesale sales and distribution uses). 797 Industrial Road is a single tenant that specializes in auto body repair and restoration. 797 Industrial is a two-story building and the business center at 814 - 870 Bransten consists of two single-story buildings. Surface parking is located around the perimeter of the site to serve each building. The existing landscaping at the site includes several street trees and shrubs along Bransten Road and a small area consisting of grass and shrubs in the northeast portion of the site. **Figure 2** shows the existing site plan.

SURROUNDING LAND USES

The project site is located adjacent to U.S. 101 to the east, by industrial and warehousing uses to the west, life science/research and development buildings (R&D) to the south, and an under-construction office/ R&D building to the north at the former Honda site. The surrounding industrial uses range from one to three stories with setbacks from the street and surface parking. The neighboring office/R&D building at 825/835 Industrial Road is 6 stories (100 feet to top of the roof screen and 106 feet 2 inches to the top of the exhaust fan stacks).

The Greater East San Carlos neighborhood includes the closest residential uses, beginning approximately 460 feet to the west/northwest of the project site. The San Carlos Airport is located to the north of the site, across U.S. 101.

PROJECT DESCRIPTION

Overview

The proposed project would involve the demolition of all existing buildings and site improvements and the construction of a new office / R&D 3-story, 105,416 square foot building with a height of approximately 50 feet. Project site improvements would also include public and private outdoor amenities, landscaping, sidewalks, and lighting along Bransten Road and Industrial Road.

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

The buildings would be setback approximately 77 feet at ground level along Industrial Road, and approximately 13 feet along Bransten Road. The main building entrance would be on the Bransten Road side. The architectural design is intended to respect the San Carlos innovation and industrial character, as well as match the design of the existing facilities by the same developer at 825 - 845 Industrial Road on the opposite side of Bransten Road, with the outer walls comprised mostly of glass. Upper-level balconies would be incorporated to increase active outdoor spaces that can be used by the tenants. In coordination with City staff, to reduce the mass and bulk of the building, the applicants have omitted a roof screen and instead setback all rooftop equipment so that it is not visible from the street.

A Conditional Use Permit is being requested for roof top elements due to the height of equipment (hydronic accessories and air handling unit), to increase the elevation of lab exhaust to meet relevant industry standards from the code specified 8.00 feet above the roof to 20.14 feet. Other rooftop elements that are within code specifications (no exception needed) would include the east stair tower and decorative elements that enhance the overall design (all under 10 feet).

The building would have a footprint of approximately 37,841 square feet. Vehicular access to the site would be provided via a proposed full-access driveway from Bransten Road to the surface parking lot with 86 spaces. The majority of the required parking would be met with excess parking in the existing structured parking in the applicant's adjacent project at 825 - 845 Industrial Road located across Bransten Road. A Parking Agreement would be executed guaranteeing maintenance and use of the off-site parking facilities for as long as such uses are in operation. In addition to the on-site vehicular spaces, 14 motorcycle parking spaces and 27 long term/14 short term bicycle parking spaces are proposed. A loading dock with two loading spaces would be provided at the rear of the building and a service yard would be located at the northern corner of the site. Trees and landscaping is proposed throughout the site including along the Industrial Road frontage and property boundaries, in the surface parking lot, and around the business/professional building.

The project proposes to include elements of the East Side Innovation District Vision Plan, including a segment of the Green Boulevard along Industrial Road and an Activity Hub at the intersection of Industrial and Bransten Roads. This is reflected on this project's plans as an increased and landscaped setback from Industrial Boulevard of 25 feet and inclusion beyond that of a public outdoor amenity space. Private outdoor amenity space for tenants is also provided in a landscaped patio area on the north side of the building and on third floor balconies.

The new building would be all electric, with no natural gas hookups. The project would redevelop a site already provided with utilities and services. Localized lines may need to be extended or relocated within the project site.

Figure 3 shows the illustrative site plan. **Figure 4** shows the shared parking plan. **Figure 5** and **Figure 6** show the proposed building elevations.

Project Construction

On-site construction work is expected to span approximately 14 months. The first month would consist of building demolition followed by approximately 3 weeks of site preparation and grading, which would include import of fill to raise the grade of the site to address future sea level rise from approximately 10-11 feet above mean sea level to a finish floor level of approximately 13.5 feet. Approximately 4,900 cubic yards of fill would be imported and approximately 1,500 of cut redistributed at the site. The haul route is proposed from southbound U.S. 101 to Brittan Avenue, right on Industrial Road, then take a right onto Bransten Road to the site. Trucks from northbound U.S. 101 will exit at Holly Street to Industrial Road, then take a left on Bransten Road to the site. Trucks exiting the site will use Bransten Road, left on Industrial Road, and left onto Brittan Avenue to southbound U.S. 101. If trucks need to travel northbound, they would utilize Industrial Road to Holly Street. Building construction and finishing would fill the remaining approximately 12 months, including about a month for paving.

Figure 1: Project Location
Source: W-Trans, 2022

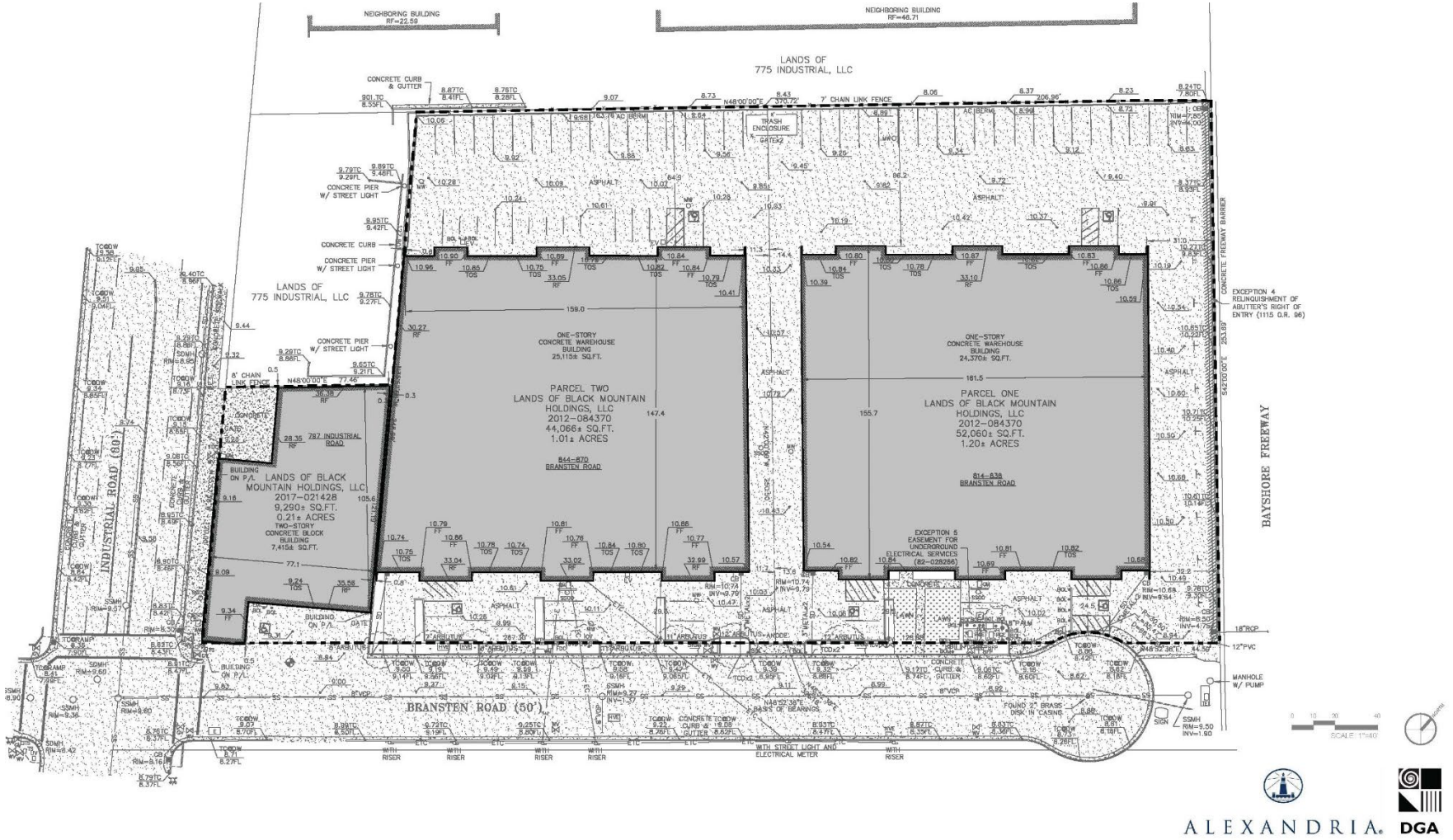

Figure 2: Existing Site Plan
Source: Project Plan Set, dated July 15, 2022

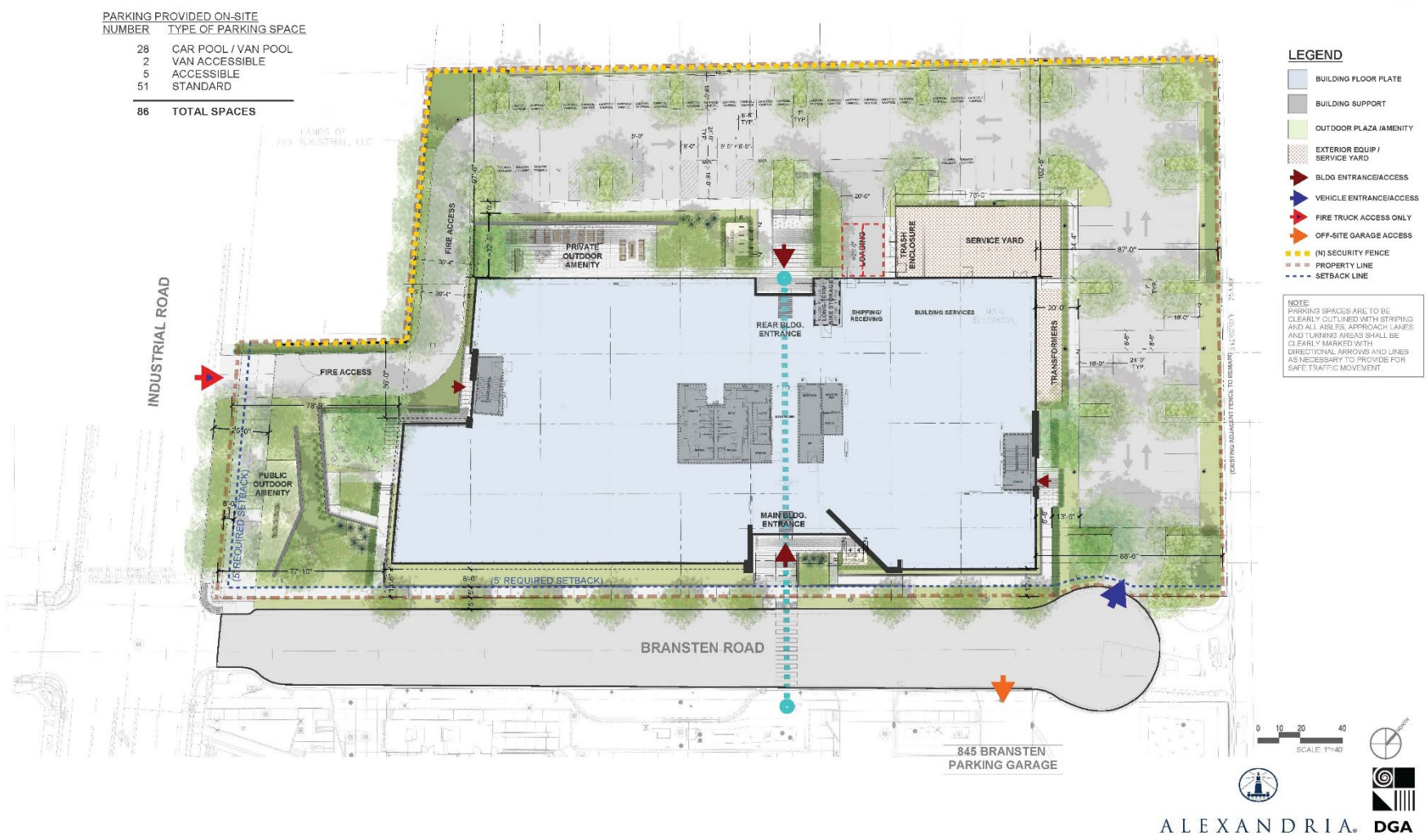

Figure 3: Illustrative Site Plan
Source: Project Plan Set, dated July 15, 2022

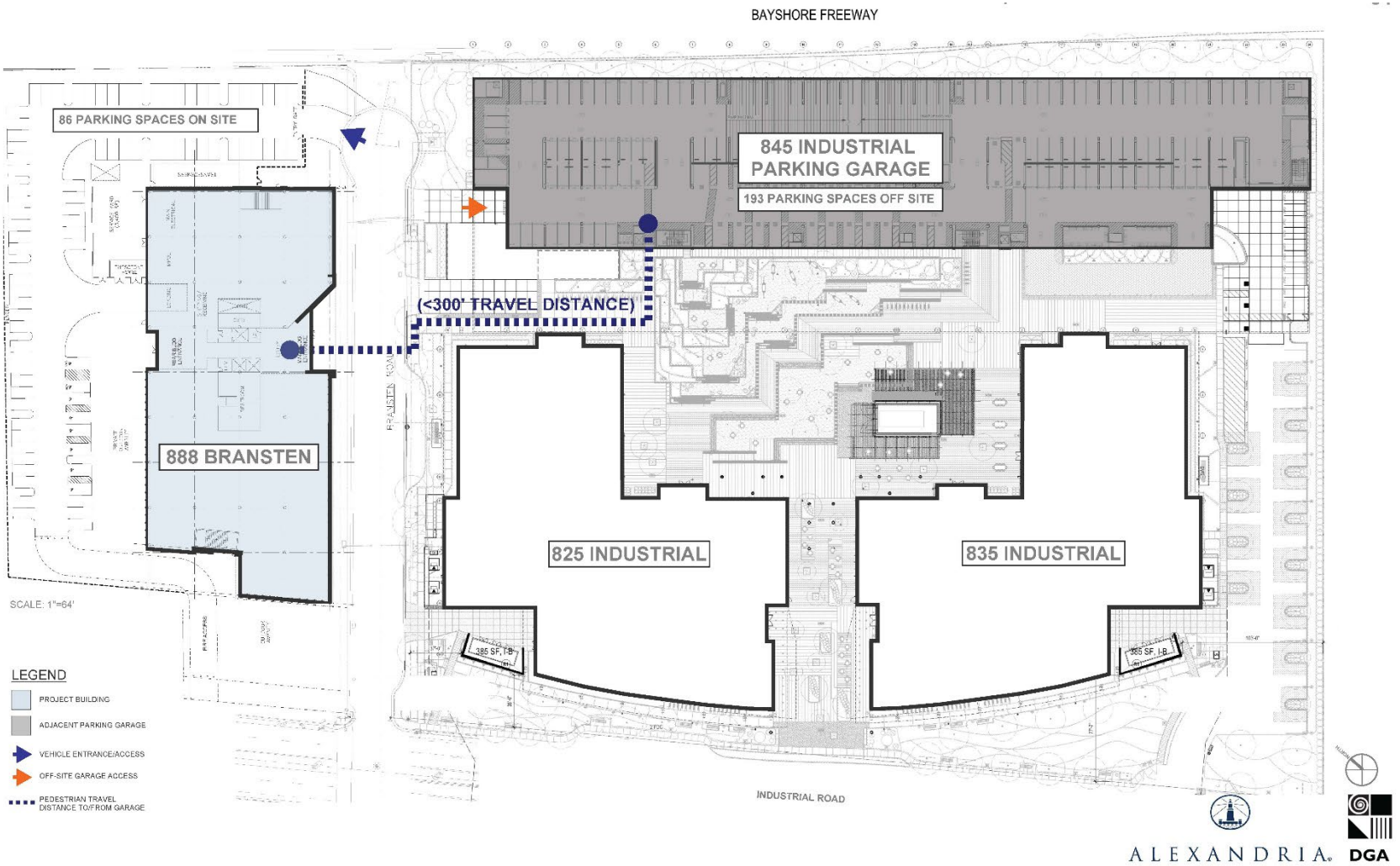

Figure 4: Shared Parking Plan
Source: Project Plan Set, dated July 15, 2022

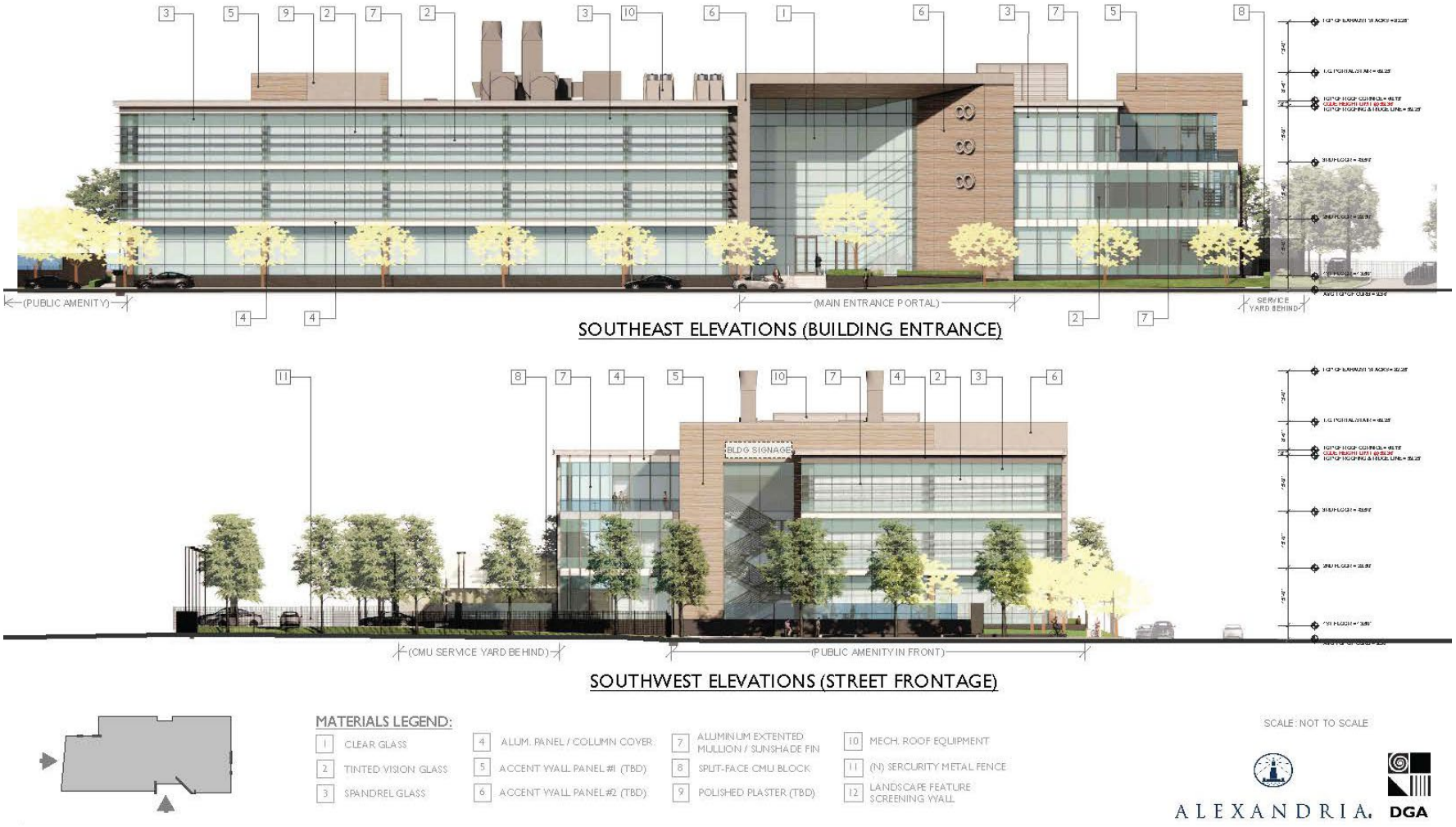

Figure 5: Building Elevations, Southeast and Southwest
Source: Project Plan Set, dated July 15, 2022

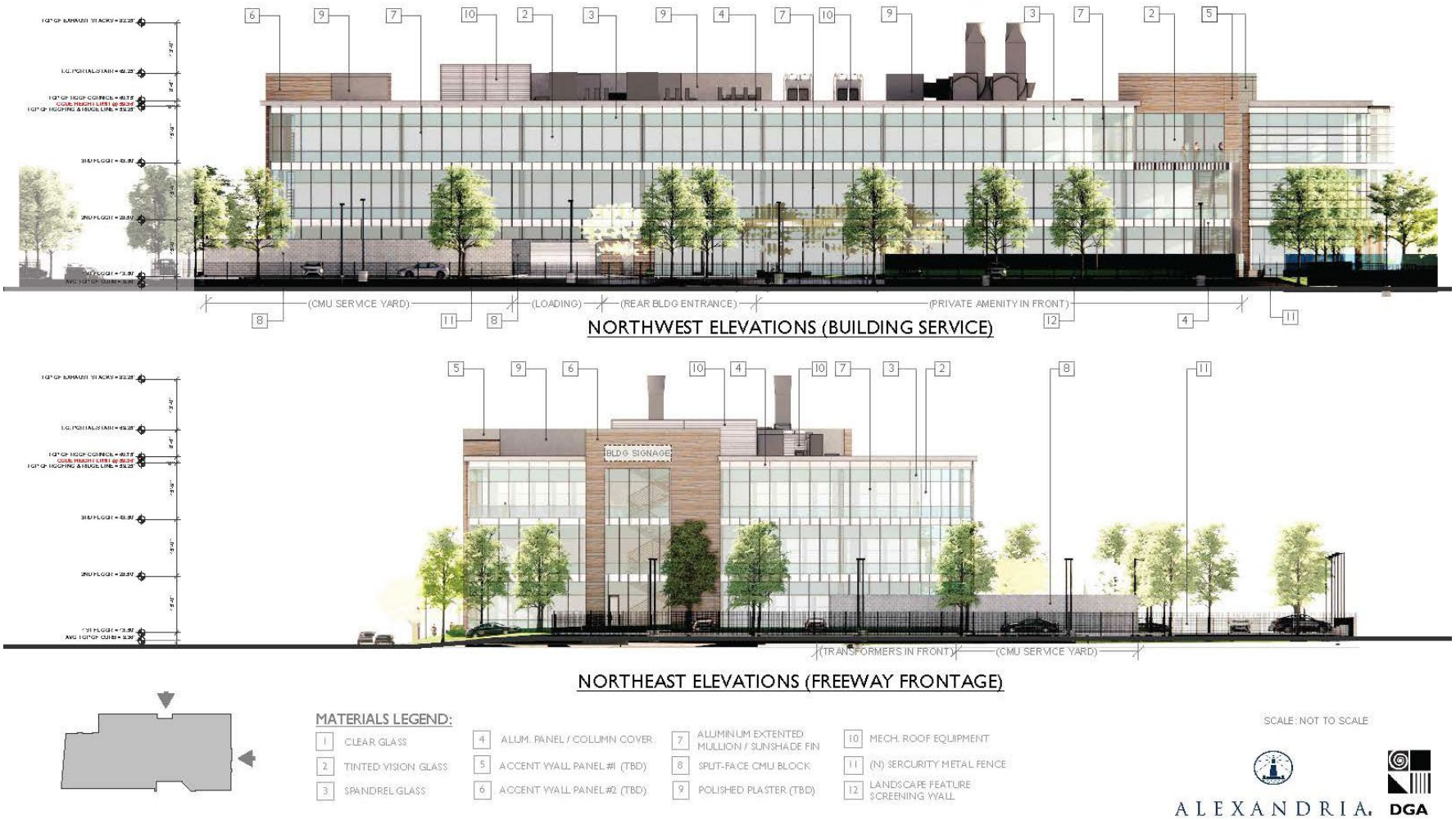

Figure 6: Building Elevations, Northwest and Northeast
Source: Project Plan Set, dated July 15, 2022

MITIGATED NEGATIVE DECLARATION

PROJECT DESCRIPTION, LOCATION, AND SETTING

This Mitigated Negative Declaration has been prepared for the 888 Bransten Road project. See the Introduction and Project Information section of this document for details of the project.

STANDARD CONDITIONS

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

Table 1: Applicable Standard Conditions

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

Resource Area/Topic	Standard Condition
	excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. (c) If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. [In which case, section 5097.98 of the California Public Resources Code would apply.]
Hydrology/ Water Quality	**Stormwater Control Plan.** A stormwater and drainage control plan shall be prepared and implemented in compliance with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), Provision C.3 of the County's Municipal Regional Stormwater NPDES Permit and any other required provisions of the City of San Carlos Municipal Code. The plan shall specify best management practices for the control and prevention of stormwater pollution. The plan shall address both construction-phase and post-construction pollutant impacts from development. Construction-phase measures shall include: erosion control measures such as installing fiber rolls, silt fences, gravel bags, or other erosion control devices around and/or downslope of work areas and around storm drains prior to earthwork and before the onset of any anticipated storm events; monitoring and maintaining all erosion and sediment control devices; designating a location away from storm drains when refueling or maintaining equipment; scheduling grading and excavation during dry weather; and removing vegetation only when absolutely necessary. Post-construction drainage controls shall be specified to capture and treat stormwater onsite.
Geology and Soils	**Compliance with design-level Geotechnical Investigation and Structural Design Plans.** Consistent with plan check procedures for Building Permit consideration, proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.

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

POTENTIALLY SIGNIFICANT IMPACTS REQUIRING MITIGATION

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

Table 2: Project Impacts and Mitigation Measures

Potential Impact	Mitigation Measures
Air Quality, Construction Emissions: Construction of the project would result in emissions and fugitive dust. While the project would be below threshold levels, the Bay Area Air Quality Management District (BAAQMD) considers dust generated by grading and construction activities to be a significant impact associated with project development if uncontrolled and recommends implementation of construction management practices to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds.	

Potential Impact	Mitigation Measures
	Mitigation Measure **Air-1: Basic Construction Management Practices.** The project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures". 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
Biological Impact: Trees on the project site or in the vicinity could host the nests of common birds that are protected under the federal Migratory Bird Treaty Act and the California Fish and Wildlife Code, so the following mitigation would be applicable to prevent a "take" of these species under these regulations related to disturbance during nesting.	
	Mitigation Measure **Bio-1: Pre-Construction Nesting Bird Survey.** Pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 30 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place.

Potential Impact	Mitigation Measures
	The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The buffer shall be maintained until after the nestlings have fledged and left the nest. If there is a complete stoppage in construction activities for 30 days or more, a new nesting survey shall be completed prior to re-initiation of construction activities.
Cultural and Tribal Cultural Resources Impact: There are no known cultural, tribal cultural, or paleontological resources at the site. However, given the moderate potential for unrecorded archeological resources and Native American resources at a currently developed site, mitigation measures Culture-1, -2, and -3 shall be implemented.	
	Mitigation Measures **Culture-1: Further Site Assessment.** Prior to ground disturbance, a qualified consultant shall conduct archival research to determine the appropriate locations for cultural resource (historic/ archaeological/ paleontological/ Native American) monitoring during removal of asphalt or concrete, fill, vegetation, or structures. Following the exposure of the original soils, a qualified consultant shall conduct a field inspection and prepare a report containing "next-step" recommendations to be implemented by the project sponsor, if the potential presence of cultural resources in certain locations is considered to be moderate or high based upon the research and field inspection of the uncovered site. Next steps could include additional exploration prior to construction, monitoring of site disturbance by a qualified professional, or no additional action other than that specified in Culture-2 and Culture-3. **Culture-2: Archaeological Sensitivity Training.** In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance. The training shall include suitable photographic materials showing the kinds of artifacts and evidence of prehistoric archaeological sites likely to be found in the area, as well as written and verbal descriptions for archaeological resources and signs of potential archaeological discovery. The training shall also include written materials describing what to do in the event of a discovery, or suspected discovery of archaeological resource. **Culture-3: Protection of Accidentally Discovered Cultural Resources**. In the event that any previously undiscovered cultural resource (historic/archaeological/ paleontological/Native American) are uncovered during ground disturbing activities, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific

Potential Impact	Mitigation Measures
	measures can be implemented to protect these resources in coordination with the City and in accordance with sections 21083.2 and/or 21084.1 of the California Public Resources Code.
Hazardous Site Impact: The project site contains known soil contamination from previously removed gasoline underground storage tanks and groundwater contamination from off-site sources consisting of Volatile Organic Compounds, specifically tetrachloroethylene (PCE). There is also the potential for unknown contamination due to the presence of undocumented fill. The project applicants will need to coordinate with appropriate regulatory authorities to complete any necessary further action as detailed in the following measure:	
	Mitigation Measure **Haz-1: Coordination with Regulatory Agencies.** The applicant shall coordinate with the appropriate regulatory agency (which is anticipated to be the San Mateo County Environmental Health Department) to identify and implement any actions required to address identified concerns related to contaminated soils and groundwater at the site. Due to the limited proposed disturbance of existing site soils, no actions may be required.
Hazardous Building Materials Impact: Because of the age of the existing buildings, there is the possibility for hazardous material from asbestos-containing materials and lead-based paint that could be released during demolition activities if not appropriately abated.	
	Mitigation Measure **Haz-2: Lead-Based Paint and Asbestos Abatement.** Prior to demolition, the applicant shall demonstrate that buildings have been assessed for asbestos-containing materials and lead-based paint and that any suspected such materials have been abated by a licensed abatement contractor and disposed of according to all state and local regulations.

LEAD AGENCY DETERMINATION

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

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation measures to reduce these impacts will be required of the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

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

EVALUATION OF ENVIRONMENTAL EFFECTS

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

1. A "no impact" response indicates that no action that would have an adverse effect on the environment would occur due to the project.

2. A "less than significant" response indicates that while there may be potential for an environmental impact, there are standard procedures or regulations in place, or other features of the project as proposed, which would limit the extent of this impact to a level of "less than significant."

3. Responses that indicate that the impact of the project would be "less than significant with mitigation" indicate that mitigation measures, identified in the subsequent discussion, will be required as a condition of project approval in order to effectively reduce potential project-related environmental effects to a level of "less than significant."

4. A "potentially significant impact" response indicates that further analysis is required to determine the extent of the potential impact and identify any appropriate mitigation. If any topics are indicated with a "potentially significant impact," these topics would need to be analyzed in an Environmental Impact Report.

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

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

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

1. The project is in a transit priority area. CEQA Section 21099(a)(7) defines a "transit priority area" as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in CEQA Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the a.m. and p.m. peak commute periods.

2. The project is on an infill site. CEQA Section 21099(a)(4) defines an "infill site" as either (1) a lot within an urban area that was previously developed; or (2) a vacant site where at least 75 percent of the site perimeter adjoins (or is separated by only an improved public right-of-way from) parcels that are developed with qualified urban uses.

3. The project is residential, mixed-use residential, or an employment center. CEQA Section 21099(a)(1) defines an "employment center" as a project situated on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

The proposed project meets all three of the above criteria because the project (1) is in a transit priority area due to the location of the El Camino Real transit corridor (a major transit stop) within 0.5 miles from the project site; (2) is on an infill site that has been previously developed and is fully adjoined by urban uses and public rights-of-way within San Carlos; and (3) is an employment center with a projected FAR of 1.0. Thus, this section does not consider aesthetics, including the aesthetic impacts of light and glare, in determining the significance of project impacts under CEQA.

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

a) Scenic Vistas

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

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

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

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

b) Scenic Highways

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

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

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

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

c) Visual Quality and Character

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

The project site, as well as the adjacent properties, are all marked by the City as potential sites for redevelopment and are being guided by the new East Side Innovation District Vision Plan. The design review process required by Chapter 18.29 of the Zoning Code requires design review for all new development in San Carlos prior to the issuance of a building permit. This review process ensures that all new development is aesthetically appropriate in scale and design, and that new buildings maintain the character of the surrounding district. Policy LU-6.6 of the General Plan encourages new development on the East Side to feature high quality architecture that reinforces the character of the area. As detailed in **Standard Condition: Exterior Materials**, included in Table 1, any significant changes to colors or materials used on the exterior of the project from those included in the application materials must be reviewed and approved by the Planning Commission. Also as included in Table 1, **Standard Condition: Signage,** any proposed signage must comply with Municipal Code Chapter 18.22, along with approval by the Planning Commission if the signage is visible from U.S. Highway 101.

The project applicants would coordinate with the City to follow the East Side Innovation District Vision Plan in regards to the required green elements of Industrial Road, including stormwater planters, plantings for a consistent tree canopy, and signage and lighting elements.

While the project would increase the height of development at the site – from one- and two-stories to three-stories with rooftop projections – increased height would not of itself be considered necessarily negative or a substantial degradation under CEQA. Additionally, the design review process required by Section 18.116.130 of the Zoning Code requires architectural review for all new development in San Carlos prior to the issuance of a building permit. This review process ensures that all new development is aesthetically appropriate in scale and design. The rooftop equipment would be setback so that it is not visible from the street.

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

d) Light and Glare

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

The project would result in development and lighting treatments typical of the existing commercial and industrial urban settings and consistent with lighting standards to minimize lighting on adjacent areas and would therefore not result in new sources of substantial adverse light or glare. A photometric plan is included in the project application, as detailed in **Standard Condition: Exterior Lighting Plan**, included in Table 1, which demonstrates that the project would meet the City's

standards that limit the amount of light that can spill over to other properties through the use of downcast lighting fixtures. As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

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

a-e) Agriculture and Forestry Resources

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

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

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

This section utilizes information from the Air Quality and Greenhouse Gas Assessment prepared for this analysis by Illingworth & Rodkin, Inc. and dated September 2, 2022, included in full as Attachment A.

a) Air Quality Plan

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

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

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

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

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

Many of the Clean Air Plan's control measures are targeted to area-wide improvements, large stationary source reductions, or large employers and these are not applicable to the proposed project. Despite this, the proposed project would not conflict with the latest Clean Air planning efforts since 1) the project would have construction and operational emissions below the BAAQMD thresholds (see criteria b/c below), 2) the project would be considered urban infill, 3) the project would be located near employment centers, and 4) the project would be located near transit with regional connections.

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

b, c) Air Quality Standards/Criteria Pollutants

Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation and include ozone precursors (NOx and ROG), carbon monoxide (CO), and suspended particulate matter (PM_{10} and $PM_{2.5}$). The Bay Area is considered "attainment" for all of the national standards, with the exception of ozone. It is considered "nonattainment" for State standards for ozone and particulate matter.

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

BAAQMD updated their Guidelines for air quality analysis in coordination with adoption of new thresholds of significance on June 2, 2010.[5] The most recent version of the Guidelines is dated May 2017.

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

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

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

Construction Emissions

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

Construction emissions for the project were modeled using the California Emissions Estimator Model ("CalEEMod"). Project details were entered into the model including the proposed land uses, demolition/earthwork volumes, and construction equipment list and schedule. Model defaults were otherwise used. The CalEEMod inputs and results are included in Attachment A. Emissions from construction are summarized in **Table 3**.

Table 3: Daily Regional Air Pollutant Emissions for Construction

Description	ROG	NOx	PM_{10} *	$PM_{2.5}$*
Average Daily Emissions (lbs/day)	5.51	14.84	0.67	0.59
BAAQMD Thresholds (lbs/day)	54	54	82	54
Exceeds Threshold?	*No*	*No*	*No*	*No*

* Applies to exhaust emissions only

Source: Illingworth & Rodkin, 2022, Table 4 in Attachment A.

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

Mitigation Measure

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

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California

airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

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

Operational Emissions

Emissions from operation of the project could cumulatively contribute to air pollutant levels in the region. These air pollutants include ROG and NOx that affect ozone levels (and to some degree – particulate levels), PM_{10} and $PM_{2.5}$. Emissions of air pollutants associated with the project were predicted using CalEEMod. This model predicts daily emissions associated with development projects by combining predicted daily traffic activity, including reductions for existing uses and the required Transportation Demand Management (TDM) plan (see Section 17, Transportation and Attachment D), associated with the different land use types, with emission factors from the State's mobile emission factor model (i.e., EMFAC2021). Emissions associated with vehicle travel depend on the year of analysis because emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates utilized by CalEEMod. The earliest full year of operation would be 2025 if construction begins in 2023. Other inputs considered for operational emissions include the project's emergency diesel generator, solid waste generation use and water/wastewater use.

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

As shown in Table 4, the project is below relevant significance thresholds established by BAAQMD for operational air pollutant emissions.

Additionally, BAAQMD presents traffic-based criteria as screening criteria for carbon monoxide impacts. As vehicular emissions have improved over the years, carbon monoxide hotspots have become less of a concern. BAAQMD presents traffic-based criteria as screening criteria for carbon monoxide impacts, as follows.[11] The project would implement a Transportation Demand Management Plan per San Carlos Municipal Code to reduce project trips. The applicant has submitted the TDM form in compliance with the Land Use Impact Analysis Program Policy of the 2019 Congestion Management Program (CMP). The project is therefore consistent with the

[11] Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, pp. 3-2, 3-3.

Congestion Management Plan of the San Mateo City/County Association of Governments (C/CAG), which is the first threshold. The other two screening thresholds are whether the project would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (such as a tunnel or underground parking garage, which are not relevant to this project). These hourly traffic volumes are very high and much higher than those in the vicinity. For example, as reported in the emissions analysis (Attachment A), traffic volumes on nearby segments of U.S. 101 would be anticipated reach up to about 6,100 vehicles per hour. Industrial Road is the highest volume local roadway in the immediate vicinity, and would be anticipated reach traffic levels of up to about 1,200 vehicles per hour. These volumes would be substantially less than 44,000 vehicles per hour. Therefore, conditions around the project would be well below screening levels and the project would not result in individually or cumulatively significant impacts from CO emissions.

Table 4: Regional Air Pollutant Emissions for Operational Period

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2025 Annual Emissions (tons/year)	0.84	0.58	0.76	0.20
2022 Existing Use Emissions (tons/year)	0.41	0.24	0.27	0.07
Net Total Operating Emissions (tons/year)	0.42	0.34	0.48	0.13
BAAQMD Thresholds (tons/year)	10	10	15	10
Exceeds Threshold?	*No*	*No*	*No*	*No*
2025 Net Daily Emissions (lbs/day)	2.33	1.87	2.66	0.69
BAAQMD Thresholds (lbs/day)	54	54	82	54
Exceeds Threshold?	*No*	*No*	*No*	*No*

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

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

d) Sensitive Receptors

For the purpose of assessing impacts of a proposed project on exposure of sensitive receptors to risks and hazards, the threshold of significance is exceeded when the project-specific cancer risk exceeds 10 in one million, the non-cancer risk exceeds a Hazard Index of 1.0 (or cumulative risk of 100 in one million or a Hazard Index of 10.0 respectively is exceeded), and/or the annual average $PM_{2.5}$ concentration would exceed 0.3 $\mu g/m^3$ (or 0.8 $\mu g/m^3$ cumulatively). Examples of sensitive receptors are places where people live, play, or convalesce and include schools, hospitals, residential areas, and recreation facilities. The project itself is not considered a sensitive receptor. The closest sensitive receptors to the project site are the single-family residences approximately 500 feet northwest of the project site opposite Industrial Road.

Construction activities that use traditional diesel-powered equipment result in the emission of diesel particulate matter including fine particulate matter, which is considered a toxic air contaminant (TAC) and potential health risk. The generation of these emissions would be temporary, confined to

the construction-period. Operational emissions from the proposed emergency generator would also contribute to community risk.

Community risks assessments from project construction and operations were performed using the recommended EPA dispersion model AERMOD to determine the potential health risks related to diesel exhaust from construction equipment and the routine testing of the diesel generator, as summarized in **Table 5**.

Table 5: Construction and Operation Risk (Unmitigated)

Source	Cancer Risk (per million)	Annual PM_{25} ($\mu g/m^3$)	Hazard Index
Project Construction (Years 0-2)	2.43	0.02	<0.01
Project Generator Operation (Years 3-30)	0.14	0.01	<0.01
Total/Maximum Project Risk (Years 0-30)	2.57	0.02	<0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Exceed Threshold?	*No*	*No*	*No*

Notes: Risks in this table are reported for the maximally exposed individual, factoring in age-sensitivity. See Attachment A for additional detail.

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

As shown in Table 5, project-specific construction-period and operational risk would be below applicable BAAQMD thresholds.

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

The project vicinity includes two high volume roadways with average daily traffic (ADT) about 10,000 (U.S. 101 and Industrial Road), nine stationary sources of air pollution, and the site of the proposed Alexander Center for Life Science (ACLS), which would be anticipated to undergo simultaneous construction with this project and introduce an additional twelve stationary sources in the form of diesel-fired emergency generators. Therefore, an additional cumulative community risk analysis is warranted. The cumulative cancer risk, hazard index, and annual $PM_{2.5}$ concentrations are summarized in **Table 6**.

As shown in Table 6, the cumulative source threshold for $PM_{2.5}$ is exceeded for the maximally exposed individual due largely to proximity to vehicular emissions from U.S. 101 and Industrial Road, which represent 73% of the cumulative $PM_{2.5}$ volumes. However, because the project-specific risk would not exceed the single source thresholds, per BAAQMD guidance, the project would not be considered to have a cumulatively considerable contribution to this impact.

Table 6: Cumulative Community Risk (Unmitigated)

Source	Cancer Risk (per million)	Annual PM_{25} ($\mu g/m^3$)	Hazard Index
Total/Maximum Project Risk (Years 0-30)	2.57	0.02	<0.01
Additional Cumulative Sources			
U.S. 101, ADT 179,520	5.22	0.26	<0.01
Industrial Road, ADT 29,760	8.34	0.54	<0.01
ACLS project generators	0.21	<0.01	<0.01
ACLS project Construction Emissions	7.03	0.19	<0.03
Other stationary sources	<1.54	<0.07	<0.09
Combined Sources	<24.91	**<1.09**	<0.16
BAAQMD Cumulative Source Threshold	100	**0.8**	10.0
Exceed Threshold?	*No*	***Yes***	*No*

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

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

As discussed above, project-specific exposure risks for the maximally exposed individual are below threshold levels and the project would not have a considerable contribution to cumulative impacts. Therefore, the project's impact related to exposure of sensitive receptors would be ***less than significant***.

e) Objectionable Odors

The proposed use is consistent with the type of development in the area and is not a use type considered by BAAQMD to be a source of substantial objectionable odors.[6]

During construction, diesel-powered vehicles and equipment would create odors that some may find objectionable. However, these odors would be temporary and not likely to be noticeable much beyond the project site's boundaries. Therefore, the potential for objectionable odor impacts is considered ***less than significant***.

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

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

a, b) Special Status Species and Habitat

The General Plan EIR identified no biological habitat or occurrences of sensitive species on or adjacent to the project site.[7] The project site is characterized by an urban setting and is entirely surrounded by like development. The site and its vicinity have little or no habitat value and would not have a substantial adverse effect, either directly or through habitat modifications, on special status species, except for possibly migrating birds, as discussed below.

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

The federal Migratory Bird Treaty Act and Fish and Game Code of California protect special-status bird species year-round, as well as their eggs and nests during the nesting season. The list of migratory birds includes almost every native bird in the United States. On-site or adjacent trees could be used by protected birds. Construction activities could adversely affect nesting birds protected by the Migratory Bird Treaty Act and/or Fish and Game Code of California.

Mitigation Measure

Bio-1: **Pre-Construction Nesting Bird Survey.** Pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 30 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place. The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The buffer shall be maintained until after the nestlings have fledged and left the nest. If there is a complete stoppage in construction activities for 30 days or more, a new nesting survey shall be completed prior to re-initiation of construction activities.

With implementation of mitigation measure Bio-1, which requires a nesting survey close to initiation of construction activities, the impacts on special status species or their habitat would be ***less than significant with mitigation***.

c, d) Wetlands and Wildlife Corridors

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

e,) Local Policies and Ordinances

The project would have a significant environmental impact if it were to conflict with any local policies or ordinances protecting biological resources. San Carlos Municipal Code Sections 18.18.070 and 18.41.020 related to protected trees are applicable to the site, as detailed in **Standard Condition: Protection of Trees**, included in Table 1.

The San Carlos Municipal Code sets forth regulations for “protected trees” which are defined as “heritage” or “significant” trees. Removal of any protected tree requires approval by the Community Development Director. In granting a tree removal permit, the Director may attach reasonable conditions to ensure compliance with the content and purpose of this chapter, such as, but not limited to, requiring replacement of trees removed with plantings acceptable to the Director.

There are currently 9 trees on the project site, located along Bransten Road, 7 of which would be removed during demolition activities. These include 5 strawberry trees (Arbutus unedo) and two California fan palms (Washingtonia filifera). Based on trunk size, 6 of the trees would be

considered significant trees under the City's Municipal. A total of 55 new trees are proposed to be planted on site as part of the proposed development.

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

f) Conservation Plans

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

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

This section utilizes information from the Historic Resource Evaluation prepared for this analysis by Preservation Architecture, Inc. and dated May 31, 2022, included in full as Attachment B.

a) Historic Resources

The site historically operated as a contractors' storage yard beginning in the 1950s, and subsequently as workshops for engineering and general contractors. Of the three site buildings at 797 Industrial Road, and 814-838 and 844-870 Bransten Road, one was constructed in 1956 and added to in 1962, and the other two were constructed in 1973, making all three existing buildings historic age (50 years). This historic resource evaluation (included in full as Attachment B) concludes that the existing structures do not qualify as historic resources per the California Register of Historical Resources criteria as demonstrated by the following conclusions:

1. No historically important persons have been identified as individually associated with these properties and buildings.

2. The subject parcels and their buildings are not directly associated with any events of historic significance as no individual discoveries, innovations or inventions of importance are identifiably associated.

3. The buildings do not individually or collectively embody distinctive design or construction characteristics while no or limited evidence of the buildings' origins has been located and no original architects, engineers, etc. are identifiable.

Therefore, although the project would remove historic-age structures, these would not be considered historic resources under CEQA and the project would have a ***less than significant*** impact related to historic resources.

b-c) Archaeological/Human Remains

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

There are only a few known archaeological sites in the city, located primarily near the banks of Cordilleras and Pulgas Creeks (away from the project site), with no known recorded cultural resources at the project site.[8] A records search of the Northwest Information Center (included in Attachment B) confirmed the lack of recorded resources. Due to the proximity to the former Bay margin (now covered by artificial fill) and Pulgas Creek, the potential for unrecorded archeological resources and Native American resources is considered moderate. Native American resources are discussed further in the Section 18, Tribal Cultural Resources.

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

Given the moderate potential for unrecorded archeological resources and Native American resources at a currently developed site, mitigation measures Culture-1, -2, and -3 shall be implemented.

Mitigation Measures

Culture-1: **Further Site Assessment.** Prior to ground disturbance, a qualified consultant shall conduct archival research to determine the appropriate locations for cultural resource (historic/archaeological/paleontological/Native American) monitoring during removal of asphalt or concrete, fill, vegetation, or structures. Following the exposure of the original soils, a qualified consultant shall conduct a field inspection and prepare a report containing "next-step" recommendations to be implemented by the project sponsor, if the potential presence of cultural resources in certain locations is considered to be moderate or high based upon the research and field inspection of the uncovered site. Next steps could include additional exploration prior to construction, monitoring of site disturbance by a qualified professional, or no additional action other than that specified in Culture-2 and Culture-3.

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

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

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

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

Implementation of requirements in Standard Condition: Protection of Human Remains and mitigation measures Culture-1, -2, and -3 would reduce the impacts associated with possible disturbance of unidentified cultural resources (historic/ archaeological/ paleontological/ Native American) at the project site to a level of ***less than significant with mitigation***.

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

a, b) Energy

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

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

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

Table 7 shows the project's estimated total construction energy consumption and annual energy consumption.

As shown in Table 7, project construction would require what equates to 5,867 MMBtu of energy use. The project would implement construction management practices per mitigation measure Air-1 (See Air Quality Section). While focused on emissions and dust reduction, the construction management practices would also reduce energy consumption through anti-idling measures and proper maintenance of equipment. The project would comply with the 2019 requirements of the California Green Building Standards Code (CALGreen) to divert a minimum of 65 percent of construction and demolition debris. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the project's construction energy consumption.

As also shown in Table 7, project annual energy consumption would equate to 12,240 MMBtu of energy use. Consistent with the City's Reach Code, the project has proposed all-electric construction with no gas connections. The project's required TDM plan (see Section 17, Transportation) will also include various measures designed to reduce total vehicle trips.

Table 7: Construction and Operational Energy Usage

Source	Energy Consumption	
	Amount and Units	Converted to MMBtu
Construction Energy Use (Total)		
Construction Worker Vehicle Trips (Gasoline)	5,240 gallons	575 MMBtu
Construction Equipment and Vendor/Hauling Trips (Diesel)	38,520 gallons	5,292 MMBtu
Total Construction Energy Use		***5,867 MMBtu***
Operational Vehicle Fuel Use (Gross Annual)		
Gasoline	50,418 gallons	5,535 MMBtu
Diesel	10,191 gallons	1,400 MMBtu
Operational Built Environment (Gross Annual)		
Electricity	1.55 GWh	5,304 MMBtu
Natural Gas Usage	0 kBtu	0 MMBtu
Total Gross Annual Operational Energy Use		***12,240 MMBtu***

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

Source: Energy Calculations included as Attachment C

When subtracting existing operational fuel and built environment energy use from the project totals above, the total net increase in annual operational energy use would be 6,338 MMBtu (see Attachment C for additional detail.)

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

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

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

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

7. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)			☒	
ii) Strong seismic ground shaking?		☒		
iii) Seismic-related ground failure, including liquefaction?		☒		
iv) Landslides?			☒	
b) Result in substantial soil erosion or the loss of topsoil?			☒	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		☒		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		☒		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		☒		

a, c, d) <u>Geologic Hazards</u>

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

The following information is based on a geotechnical assessment prepared by the applicants and included in the project application. Surface pavements generally consisted of 3 to 5 inches of asphalt concrete over 6 to 7 inches of aggregate base. Below the surface pavements and aggregate

base is undocumented fill to depths ranging from 5 to 8½ feet below the existing ground surface. The fill consisted of sandy lean clay and clayey sand with variable amounts of gravel. Below the fill is Bay Mud (very soft to soft fat clay) to depths of 7½ to 8½ feet below the existing ground surface. The Bay Mud is generally underlain by very soft to very stiff lean clay with variable amounts of sand interbedded with medium dense to very dense clayey sand and medium dense silty sand. Stabilized ground water level is generally considered to be at or near the top of the Bay Mud. Given the characteristics of the soils, the site was concluded to have the following characteristics:

- low to moderate expansion potential to wetting and drying cycles,
- liquefaction with potential for differential settlements of less than ¼-inch over a horizontal distance of about 30 feet,
- low potential for lateral spreading to affect the site,
- low potential for significant differential seismic settlement affecting the proposed structures.

The geotechnical analysis concluded that the potential geological hazards can be addressed through appropriate design and construction[9], which would occur as part of the standard design-level geotechnical recommendations and structural plans specified in mitigation measure Geo-1.

Mitigation Measure

Geo-1: **Compliance with a design-level Geotechnical Investigation report prepared by a Registered Geotechnical Engineer and with Structural Design Plans as prepared by a Licensed Professional Engineer.** Proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.

Compliance with a design-level Geotechnical Investigation and Structural Design Plans, as required by mitigation measure **Geo-1** would reduce the potential impact of seismic hazards including liquefaction to a level of ***less than significant with mitigation***.

b) Soil Erosion

The project site is generally flat, with elevations ranging from about 9 to 11 feet above mean sea level. The project would be subject to a National Pollution Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board (RWQCB). The construction contractors would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and an Erosion Control Plan. The SWPPP must describe the site, the project, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, control of post-construction sediment and erosion control measures, maintenance responsibilities, and management controls. All construction activities would be required to comply with Chapters 12 and 18 of the City Municipal Code, and Appendix J of the California Building Code, which regulate the construction of foundations and retaining walls, and grading activities, including drainage and erosion control. Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. With required implementation of a SWPPP and Erosion Control Plan to prevent erosion,

[9] Cornerstone Earth Group, Geotechnical Investigation, Life Science Office Space Development, 797 Industrial Road, 814-838 and 844-870 Bransten Road, San Carlos, California, dated July 5, 2019

sedimentation, and loss of topsoil during and following construction, the soil erosion impacts of the project would be ***less than significant***.

e) Septic Tanks

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

f) Unique Geologic Feature or Paleontological Resources

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

Mitigation Measures Culture-1, Culture-2, and Culture-3 would also reduce the potential impact related to unknown paleontological resources.

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

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

a) Greenhouse Gas Emissions

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

State Assembly Bill 32 (AB 32) required California state and local governments to reduce greenhouse gas emissions to 1990 levels by 2020. State Senate Bill 32 was subsequently adopted to require that there be a further reduction in GHG emissions to 40% below the 1990 levels by 2030. The additional 40% reduction by 2030 identified in SB 32 equates to a 2030 efficiency standard of 2.8 metric tons CO_2e per year per service population.

In April 2022, BAAQMD issued new GHG emissions thresholds, revising the quantified threshold to a checklist of compliance, requiring consistency with either criterion A or B as follows:

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

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

i. Residential projects: 15 percent below the existing VMT per capita

ii. Office projects: 15 percent below the existing VMT per employee

iii. Retail projects: no net increase in existing VMT

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

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

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

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

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

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

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

Assumed conformance – Current plans do not include the level of detail appropriate to determine how many EV parking spaces are proposed but compliance with City regulations can be assumed. The project would need to 18 EV parking spaces out of the 88 proposed on-site parking spaces to be in compliance with this requirement, or demonstrate overall compliance when factoring in the shared parking at 825 - 845 Industrial Road.

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

Assumed conformance – The project proposes to incorporate this project into the TDM Plan for the associated 825 - 845 Industrial Road development. While the updated TDM Plan was not available for review for this analysis, it is assumed that the TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code. With this required TDM Plan reduction, VMT per service population would be reduced by at least 15 percent over regional average (see Section 17 Transportation).

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

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

On September 27, 2021, the San Carlos City Council adopted a new Climate Mitigation and Adaptation Plan (CMAP) to reduce GHG emissions. The CMAP aims to reduce emissions 40% by 2030 and 80% by 2050 relative to 1990 levels. This CMAP is an update to the 2009 Climate Action Plan (2009 CAP) that provides updated information, an expanded set of GHG reduction strategies,

climate adaptation strategies and a planning horizon out to 2050. There is not currently a checklist for development project, but the following goals and strategies found in the CMAP would be relevant to this project:

Goal 1: Reduce energy use

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

  Conforms – The project would be required to meet the CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficacy standards.

Goal 2: Transition to carbon-free energy sources

- Strategy 4: Electrification. Transition to electricity as the primary energy source citywide.

- Strategy 5: Building Codes. Advance electrification through local amendments to the California Building Code.

- Strategy 7: Peninsula Clean Energy. Continue to support and promote PCE as the community's official electricity provider with a goal to provide 100 percent carbon-free renewable energy by 2025.

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

Goal 4: Promote sustainable development that reduces vehicle miles traveled

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

  Assumed conformance – The proposal is to incorporate this project into the TDM Plan for the associated 825 - 845 Industrial Road development. While the updated TDM Plan was not available for review for this analysis, it is assumed that the TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code (see Section 17 Transportation).

Goal 7: Become a zero-waste community

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

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

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

To further support conclusions related to the qualitative criteria above, GHG emissions were modeled quantitatively using CalEEMod, as discussed in the Air Quality section, and are included here as an informational item. To meet 2020 reduction targets, BAAQMD had recommended threshold of significance for operational GHGs of 1,100 metric tons carbon dioxide equivalent (CO_2e) per year or, if the project was too large to meet that threshold, an efficiency threshold of 4.6 metric tons CO_2e per service population (residents and employees) per year. Because this is a relatively large office/R&D project, the efficiency threshold would be most applicable to this analysis. While BAAQMD did not update recommendations to address 2030 reduction targets, industry standard is to assume an additional 40% reduction per State directives, which equates to a standard of 2.8 metric tons CO_2e per year per service population. A summary of the results is included in **Table 8**.

Table 8: Greenhouse Gas Emissions

Description	GHG in metric tons CO_2e per year [1]
Project Emissions, Operational	604
Project Emissions, Construction (averaged over 40 years) [2]	11
Project Emissions, Total	615
Project Service Population [3]	351
Project Emissions, Total (per Service Population) [4]	1.75
Project Service Population Extrapolated Significance Threshold	2.8 in 2030
Exceeds Threshold?	*No*

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

1 CO_2e is carbon dioxide equivalent units, the standard measure of total greenhouse gasses.

2 Standard practice is to divide the construction emissions by 40 years (an average building life) and add that to the operational emissions for comparison to thresholds.

3 Service Population was calculated at approximately 300 square feet per employee for office/R&D.

4 The emissions in this table are gross emissions for the proposed project with no reduction to account for existing uses and emissions.

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

b) Greenhouse Gas Reduction Plans

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

BAAQMD thresholds and the City's CMAP and would therefore be consistent with the GHG emissions reduction goal of the Clean Air Plan.

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

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

a) Routine Use of Hazardous Materials

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

While specific tenants have not yet been identified, office uses would involve household hazardous waste such as vehicle components and cleaners. R&D laboratories additionally are likely to handle materials considered to be biological hazards and/or chemical hazards. The San Mateo County Environmental Health Division (SMCEHD) enforces certain regulations pertaining to safe handling and proper storage of hazardous materials to prevent or reduce the potential for injury to health

and the environment. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials.

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

b, d) Hazardous Materials Site and Accidental Release

A Phase I Environmental Site Assessment and a Subsurface Investigation Report were prepared for the project by AllWest Environmental (Oct 1, 2019, and March 7, 2017) and are available as part of the project application. The following conclusions are informed by those documents.

The project site includes the following concerns related to hazardous materials:

A 2,000-gallon, concrete wastewater neutralization underground storage tank (UST) associated with the former printed circuit board plating operations was removed from the 844 Bransten Road parcel in 1986. The SMCEHD documented the property was "relatively clean", with the exception of solvent impact from an off-site source, and stated they were satisfied with the facility closure and would require no further action. No further assessment or action is recommended at this time related to this former UST.

Two 550-gallon gasoline USTs and one 25- to 55-gallon drum previously containing waste oil were removed from beneath the parking area along Industrial Road in 1992. Due to the proximity of the UST excavation to the existing building foundation, excavating all significantly impacted soil was infeasible. An estimated 28.7 cubic yards of soil impacted with significant concentrations of petroleum hydrocarbons remains present between the excavation walls and the building. The SMCEHD issued case closure for the USTs in 1999, with specification that additional work could be required if redevelopment/renovation was conducted in the future. Residual contaminant concentrations are expected to have been reduced due to naturally occurring biodegradation since that time, but further action may be required.

Volatile Organic Compounds (VOCs), specifically tetrachloroethylene (PCE), from off-site sources have been documented in subject property ground water and Industrial Road parcel sub-slab soil vapor at concentrations exceeding current vapor intrusion Environmental Screening Levels (ESLs). Based on the testing results, the likelihood of a vapor intrusion concern within the buildings on the subject property has been determined to be low but further action may be required.

As the subject property was reclaimed from the San Francisco Bay prior to the late-1930s through placement of undocumented fill, the potential for residual contaminants, such as metals, petroleum hydrocarbons, polynuclear aromatic hydrocarbons (PNAs) and polychlorinated biphenyls (PCBs), to remain present in near-surface soils cannot be discounted.[10]

[10] AllWest Environmental, Environmental Site Assessment, 797 Industrial Road and 814-838 and 844-870 Bransten Road, San Carlos, CA 94070, dated October 1, 2019

No active site remediation is currently required or planned. Due to the site history and consistent with standard methodologies for development in formerly industrial areas, it is anticipated that pockets of impacted soil may be discovered during construction activities, and these would be handled for off-site disposal per standard procedures.[11]

Given the site is currently developed and any remediation efforts would be required to coordinate with SMCEHD and occur during demolition/excavation activities, mitigation measure Haz-1 shall be implemented.

Mitigation Measure

Haz-1: **Coordination with Regulatory Agencies.** The applicant shall coordinate with the appropriate regulatory agency (which is anticipated to be the San Mateo County Environmental Health Department) to identify and implement any actions required to address identified concerns related to contaminated soils and groundwater at the site. Due to the limited proposed disturbance of existing site soils, no actions may be required.

Based on the presence of volatile organic compounds (VOCs) in soil vapor and groundwater at the site (at least some of which are related to off-site contamination that has migrated beneath the site), a chemical vapor intrusion mitigation system (VIMS) is proposed to be incorporated beneath the foundation of the new building, which will be designed and installed in accordance with state guidance.[12]

Additionally, because of the age of the existing buildings, there is also the possibility for hazardous material from asbestos-containing materials and lead-based paint that could be released during demolition activities.

Mitigation Measure

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

Implementation of mitigation measures Haz-1 and Haz-2 would reduce the impact related to a hazardous materials site and upset or accidents involving the release of hazardous materials into the environment to a level of ***less than significant with mitigation*** through further action as appropriate to address contaminated site soils and groundwater and assessment/abatement of hazardous building materials.

c) Hazardous Materials Near Schools

No schools are located within a quarter mile of the site. As discussed above, soil and groundwater contamination at the site and any hazardous materials used during construction and operations would be handled according to applicable regulations and safety standards. With compliance with existing regulations, the project would represent a ***less than significant*** impact relative to the

[11] DGA, *Response to Deemed Incomplete*, dated July 15, 2022, included as part of project files at the City.

[12] Ibid

potential exposure of the public including students at nearby schools to hazardous materials at the project site.

e) Airport Hazards

The closest airport is the San Carlos Airport, a small county airport, located less than ¼ mile to the east of the project site.

According to the Airport Land Use Compatibility Plan, the project site is not within a primary flight path, but is within the traffic pattern zone. Office and R&D uses are identified as compatible uses in this zone. Development on the project site is limited to maximum heights between 105 and 155 feet above mean sea level, but could be modified through consultation with the Federal Aviation Administration (FAA). Factoring in the height of the site, the highest rooftop elements would reach maximum heights of approximately 82.25 feet above mean sea level, which would be below the FAA height limits. Because of the location within the Airport Land Use Compatibility Plan area, the project would be required to submit Form 7460-1 with the FAA for a hazard determination to confirm that the proposed building is compatible with height constraints and would not include elements dangerous to aircraft such as blinking lights, smoke columns, or attraction of birds. [13] The project appears to be in conformance with the applicable rules. There are no other airports, either public or private within the vicinity of the project. There would be a ***less than significant*** impact related to airport hazards.

f) Emergency Response Plan

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

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

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

g) Wildland Fire

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

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

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

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

a, e) <u>Water Quality and Discharge</u>

Construction Period Water Quality

Any development project that would disturb an area larger than one acre is required to obtain an NPDES General Construction Permit from the State Water Resources Control Board (SWRCB). The terms of this permit require applicants to prepare a SWPPP to demonstrate that project development would not cause any increase in sedimentation, turbidity, or hazardous material concentrations within downstream receiving waters. Design requirements and implementation measures for erosion and sedimentation controls would be set forth in the applicant's SWPPP, in accordance with SWRCB design standards, and with the City's Grading and Erosion Control

Ordinance (Sections 12.08.160 through 12.08.230 of the San Carlos Municipal Code). During construction, the RWQCB would monitor implementation of the project's approved SWPPP.[15]

Water Quality During Occupancy and Operation

Federal Clean Water Act regulations require municipalities to obtain NPDES permits which outline programs and activities to control surface stormwater pollution. Municipalities, such as the City of San Carlos, must eliminate or reduce "non-point" pollution, consisting of all types of substances generated as a result of urbanization (e.g., pesticides, fertilizers, automobile fluids, sewage, litter, etc.), to the "maximum extent practicable" (as required by Clean Water Act Section 402(p)(3)(iii)). Clean Water Act Section 402(p) and USEPA regulations (40 CFR 122.26) specify a municipal program of "best management practices" to control stormwater pollutants. Best Management Practices (BMP) refers to any kind of procedure or device designed to minimize the quantity of pollutants that enter the storm drain system. To comply with these regulations, each incorporated city and town in San Mateo County joined with the County of San Mateo to form the San Mateo County Water Pollution Prevention Program (SMCWPPP) in applying for a regional NPDES permit.[16]

The RWQCB adopted a Municipal Regional Permit (MRP) on October 14, 2009, as updated in May 2022, as the NPDES permit for all Bay Area municipalities, which includes Provision C.3. The C.3 requirements are intended to protect water quality by minimizing pollutants in runoff, and to prevent downstream erosion by: designing the project site to minimize imperviousness, detain runoff, and infiltrate runoff where feasible; treating runoff prior to discharge from the site; ensuring runoff does not exceed pre-project peaks and durations; and maintaining treatment facilities. Project applicants must prepare and implement a Stormwater Control Plan, as detailed in **Standard Condition: Stormwater Control Plan**, included in Table 1, containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the SMCWPPP C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

Currently, there are no storm water management facilities onsite that provide treatment or detention, and runoff from the site travels overland across the parking areas and in curb and gutter until it reaches existing catch-basins connecting to storm drain lines that ultimately discharge to Pulgas Creek.

The project has prepared stormwater treatment plans and C.3 and C.6 worksheets demonstrating the change in impervious area at the site and appropriateness of stormwater system elements. The site is currently covered almost entirely with impervious surfaces (98.7% of the site). The proposed project would reduce the impervious surfaces by 21,694 square feet to 84,961 square feet, representing approximately 81% of the site. Runoff generated at the site would be directed to catch-basins, storm drainpipe, and bio-retention areas to capture, treat, and discharge runoff from the entire site to the 30-inch storm drain in Industrial Road, with the exception of approximately 1 acre of the project site that would be redirected to Bransten Road.

Through compliance with post-construction requirements in Standard Conditions: Stormwater Control Plan related to implementation of the NPDES permit C.3 requirements, including project preparation and implementation of a Stormwater Control Plan and Stormwater Facility Operation

[15] Construction General Permit Order 2009-0009-DWQ.

[16] Regional Water Board, 2007, Order No. R2-2007-0027, NPDES Permit No. CAS0029921.

and Maintenance Plan, the long-term volume of water and water quality impacts from project operation would be ***less than significant*** and the project would comply with applicable water quality control regulations.

b) Groundwater Recharge and Supplies

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

c) Drainage Pattern Alteration

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

d) Inundation

Flooding

A portion of the project site is located within Federal Emergency Management Agency (FEMA) Flood Zone AE, which is a special flood hazard area (SFHA) subject to inundation by the 1% annual chance flood with base flood elevation of 10 feet above mean sea level.[17] The remainder of the site is in Zone X, which is not a substantial flood hazard. The site elevation is between 9 and 11 feet above mean sea level, so could be expected to be partially subject to flooding in the event of a 100-year flood. The grading plan has taken this into account, with the ground floor of buildings proposed higher than the 10-foot level, at approximately 13.5 feet above mean sea level, and grading of the remainder of the site planned to direct any surface water into lower bioretention areas. All utilities and sanitary facilities below the 10-foot level would be flood proofed to be watertight, as required by City floodplain ordinance section 15.56.150.C.

As discussed under item a, the site is currently fully developed (98.7% impervious) and the proposed project would increase pervious areas and improve drainage at the site such that it would not substantially change flood flows. The impact with relation to flooding would be ***less than significant***.

Failure of a Levee or Dam

The project site is not located within an area subject to inundation in the event of a failure of any dam.[18] The project site is not located in an area that is protected by levees. There would be ***no impact*** on the project related to dam or levee failure inundation.

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[17] Federal Emergency Management Agency (FEMA), April 2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0169G.

[18] City of San Carlos, *San Carlos 2030 General Plan*, p.194.

Other Inundation

A tsunami or seiche originating in the Pacific Ocean would lose much of its energy passing through San Francisco Bay. Areas most likely to be inundated are those at or below sea level and within 1½ miles of the shoreline. The site is approximately 2¾ miles inland from the San Francisco Bay shoreline and is approximately 9 to 11 feet above mean sea level, with plans to raise the grade to approximately 13.5 feet above mean sea level at the location of the building. Relatedly, the site is mapped by the State of California Tsunami Inundation Map as not being within an inundation area.[19] The site elevation is also more than 66 inches above mean sea level, which is the projected potential sea-level rise by 2100.[20] Additionally, the site is not located proximate to a hillside that could generate mudflow. Therefore, the potential for inundation due to tsunami, seiche, sea level rise, or mudflow would be ***less than significant***.

[19] California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, Redwood Point/Palo Alto Quadrangle, June 15, 2099, available at http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps.

[20] California Department of Water Resources, California Climate Science and Data for Water Resources Management, June 2015.

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

a) Physical Division of a Community

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

b) Conflict with Land Use Plan

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

The site is currently zoned IH (Heavy Industrial), under which R&D use is explicitly allowed and office use is allowed with a conditional use permit. The project complies with the development standards of the IH zoning district with the issuance of a Conditional Use Permit to allow additional height for a tower feature.

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

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

a, b) Mineral Resources

San Carlos, including the project site, contains no known mineral resources.[21] The project would have ***no impact*** with regard to mineral resources.

[21] City of San Carlos, *San Carlos 2030 General Plan*, p.111.

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

a-b) Excessive Noise or Vibration

Noise and vibrations from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise sensitive receptors. Construction noise impacts primarily occur when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise sensitive land uses, or when construction involves particularly noisy techniques, such as driven piles. The closest sensitive receptors to the project site are the single-family residences approximately 500 feet northwest of the project site opposite Industrial Road.

As detailed in **Standard Condition: Construction Noise**, included in Table 1, the San Carlos Noise Ordinance (Chapter 9.30 of the Municipal Code) restricts construction activities to the hours of 8:00 AM to 5:00 PM on weekdays, 9:00 AM to 5:00 PM on Saturdays. The project is not anticipated to require pile driving and the project's construction activities would comply with the Noise Ordinance. With compliance with requirements in Standard Condition: Construction Noise, temporary construction-period noise and vibration impacts are considered ***less than significant***.

Operation of an office/R&D use would not be considered a noise-sensitive receptor and does not produce substantial levels of off-site vibration or noise. Rooftop equipment would be required to comply with the City's Noise Ordinance, would be shielded as appropriate, and in any case, would not have the potential to generate noise levels above ambient levels at sensitive receptors 500 feet away. Traffic-related noise impacts generally have the potential to occur with at least a doubling of traffic volumes on roadways adjacent to areas with noise sensitive uses that are already at or above acceptable noise conditions. The project is located proximate to U.S. 101 and would not require

substantial trips to pass by noise sensitive uses other than on high-volume roadways such as U.S. 101 and Industrial Road, which carries substantially more than the volume of project traffic under existing conditions and would therefore not have the potential to experience a doubling in volume with the addition of project traffic. Therefore, noise and vibration impacts from operation of the project would be ***less than significant***.

c) Airport Noise

The closest airport to the project site is the San Carlos Airport, located less than ¼ mile to the east of the project site. The project site is within the boundary of the Airport Land Use Compatibility Plan, is not within a primary flight path, but is within the traffic pattern zone, in an area with project airport noise levels between 60 to 65 dBA.[22] Impacts related to excessive aircraft noise exposure would be ***less than significant***.

Informational Item: Noise Compatibility

While not an impact of the project on the environment under CEQA, the following information related to the appropriateness of the noise environment for the proposed project is provided for informational purposes:

The General Plan indicates that for "Office Buildings, Business, Commercial and Professional" noise levels between 70 to 80 dBA are conditionally acceptable, whereas higher noise levels may result in a project unable to comply with noise element policies.[23] ("dBA" is the A-weighted decibel level, which gives greater weight to sounds to which the human ear is sensitive and is a standard measure of noise affecting humans.)

Roadway noise, specifically from U.S. 101 highway traffic and traffic along Industrial Road, is the greater noise source at the site. Based on modeling for the General Plan, the front half of the site is subject to noise levels between 70-75 dBA. The back half of the site is closer to the highway and would experience noise levels above 75 dBA. The City may desire to have the applicant provide project-specific acoustical assessment of the site and specific construction standards of the proposed building to demonstrate appropriateness of noise levels for the proposed uses.

[22] City/County Association of Governments of San Mateo County, Adopted October 2015, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport*, Exhibit 4-2.

[23] City of San Carlos, *San Carlos 2030 General Plan*, pp. 231, 236, and 238.

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

a) Substantial Population Growth

While neither housing nor population are directly created as a result of this project, employment opportunities can indirectly increase population and the demand for housing. The General Plan estimated job growth in San Carlos of 8,530 jobs between 2005 and 2035, which would raise the projected jobs-to-housing ratio from 1.4 in 2010 to 1.7 in 2035. The trends in job growth and jobs-to-housing ratio are similar to those county-wide and consistent with regional projections, and the General Plan EIR concluded the impact related to population growth would be less than significant.[24, 25] The proposed project represents a portion of the job growth identified in the General Plan and therefore consistent with local and regional increases. Therefore, the project would have a ***less than significant*** impact related to population growth.

b) Displacement of Housing or People

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

[24] City of San Carlos, San Carlos 2030 General Plan, Housing Element, pp.11, 12.

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

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

a-e) Public Services

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

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

a-b) Recreation

The proposed project would not construct or substantially increase the use of public recreational facilities. On-site public open space would be provided on the Industrial Road frontage. This area would be designed for pedestrian use and enhanced with landscaping in accordance with Municipal Code Chapter 18.18. The project would not otherwise construct or cause to be constructed parks or recreational facilities.

Some employees at the site could use public recreational facilities in the area. The use of public recreational facilities would not be anticipated to increase substantially due to use by project employees such that physical deterioration would occur or construction or expansion would be necessary. Therefore, the impact related to recreation would be ***less than significant***.

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

This section utilizes information from the CEQA Transportation Analysis prepared for this analysis by traffic engineers W-Trans and dated July 29, 2022, included in full as Attachment D.

a) Circulation System Facilities

The project proposes to add sidewalks to the Bransten Road frontage (not currently existing) and would provide bicycle parking to meet or exceed City requirements. Industrial Road has continuous sidewalks within the vicinity of the project site already. Sidewalks along each of the project frontages on Industrial Road and Bransten Road are included in the project site plan.

Cyclists share the proposed on-site roadways and Bransten Road with vehicles. Cyclists would access the City network of bicycle facilities via the existing bicycle lanes adjacent to the site on Industrial Road. The proposed project does not appear to impact the safety of cyclists or have any hazardous design features impeding the use of bicycles.

The San Carlos Caltrain Station is located approximately 0.6 miles to the west, which connects San Carlos with San Francisco to the north and San Jose and Gilroy to the south. The San Mateo County Transit District (SamTrans) provides bus service in San Carlos. Their buses are equipped with bicycle racks for three bicycles. The closest SamTrans stop is at the intersection of El Camino Real and Arroyo Avenue, which is approximately ½ mile from the project site. That stop is served by three routes: Route 397, providing service between San Carlos and San Francisco or Palo Alto; Route 398, providing service between San Carlos and San Francisco or Redwood City; and Route ECR, providing service between the Daly City BART station and Palo Alto with stops on El Camino Real near the project site.

As discussed in further detail under item b) below and in **Standard Conditions: Transportation Demand Management**, included in Table 1, a TDM plan is required for the proposed project to

meet the City of San Carlos' development guidelines, including a vehicle trip reduction rate of 20 percent. TDM plan measures further promote alternative modes, including pedestrian, bicycle, carpool, and transit options. In addition, the applicant has submitted the TDM form in compliance with the Land Use Impact Analysis Program Policy of the 2019 Congestion Management Program (CMP). Compliance will these TDM measures will be coordinated though C/CAG, the CMP Agency.

Given the size and location of the currently proposed project, any expected impacts to the current transit system would be considered minimal. Since the proposed project does not conflict with any adopted policies or plans related to pedestrian, bicycle, or transit activity, the proposed project would have a ***less than significant*** impact on pedestrian, bicycle, and transit service.

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

The proposed project would generate an average of 779 net new trips daily, with 106 new trips during the AM peak hour and 97 new trips during the PM peak hour. The Transportation Operations Analysis concluded that with implementation of improvements included in the City's Transportation Improvement Fee Program, the project would not cause any study intersections or freeway segments to degrade from acceptable operations to unacceptable operations. While some intersections / freeway segments operate at conditions considered unacceptable under existing and/or cumulative conditions, the project's contribution to those intersections would be below applicable threshold levels. Therefore, the project would be consistent with applicable circulation system roadway planning and policies and would have a ***less than significant*** impact on the circulation system.

b) <u>Vehicle Circulation and Congestion</u>

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

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

A TDM plan is required for the proposed project to meet the City of San Carlos' development guidelines, as detailed in **Standard Conditions: Transportation Demand Management**, included in Table 1, which would further reduce traffic generated by the project and contribute to use of alternate modes discussed above. The proposal is to incorporate this project into the TDM Plan for the associated 825 - 845 Industrial Road development. While the updated TDM Plan was not available for review for this analysis, it is assumed that the TDM plan would reduce vehicle trips by 20 percent to meet Section 18.25.030 of the City of San Carlos Municipal Code.

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

Table 9: VMT Estimation

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

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

Taking into account implementation of the requirements in Standard Conditions: Transportation Demand Management, the estimated VMT per Service Population for the project would be 12.2 miles, which is less than the 14.5 VMT threshold for office projects, resulting in a ***less than significant*** impact.

c) Hazards

The proposed project would reduce the number of existing driveways serving previous land uses from seven to one, plus one emergency-vehicle-only access on Industrial Road. The remaining driveway would be located in a cul-de-sac at the terminus of Bransten Road. Since Bransten Road is generally flat and straight, and the proposed buildings are set back from the roadway, the lines of sight in both directions from the driveways (including the emergency access drive) are adequate. (See Attachment D for additional detail.) The impact with respect to traffic hazards would be ***less than significant***.

As is standard practice, landscaping installed along the roadway frontage near driveways should be maintained to be either low-lying or trees with canopies that do not fall below seven feet and parking should be restricted within 25 feet of the driveways, including prohibiting parking in the cul-de-sac.

d) Emergency Access

Emergency response vehicles would be able to access the site via the project driveway on Bransten Road as well as a dedicated emergency-vehicle-only access on Industrial Road approximately 100 feet north of Bransten Road. Since the driveway and internal roadways would be designed and constructed to current City standards to accommodate both passenger and emergency vehicles. Ladder trucks could also access the project site while parked on Bransten Road. Since all roadway users must yield the right-of-way to emergency vehicles when deploying their sirens and lights, the

added project-generated traffic would not impact access for emergency vehicles. The project would have a ***less than significant*** impact on emergency access.

18. TRIBAL CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		☒		

a) Tribal Cultural Resources

The project area is previously disturbed, and a search of the Sacred Lands File (included in Attachment B) did not identify any Sacred Lands that could be impacted by the project. While no tribes have requested consultation for project in this area, notice was sent to listed tribes on April 29, 2022, per recommendation of the Native American Heritage Commission. No responses were received within the required 30 response period.

As discussed in more detail under the Cultural Resources section, the project location is previously disturbed, and a records search performed by the Northwest Information Center (included in Attachment B) confirmed there are no known Native American resources on the site and the potential for unrecorded resources is considered moderate. Construction of the project involves ground disturbance and if unknown tribal cultural resources or human remains are encountered, there is the potential for a significant impact.

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

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

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

a, c-e) Utilities

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

b) Water Supply

The size of the project does not trigger a need for a project-specific Water Supply Assessment under Senate Bill 610. Water service in San Carlos is managed by California Water Service Company (Cal Water) Bayshore District. The projected water use from the Cal Water Bayshore District for

2030 is 18.1 million gallons per day (MGD). San Carlos has a projected 2030 average demand of 4.8 MGD and Cal Water was determined at the time to have sufficient water supply to accommodate the future demand under the General Plan and the General Plan impact related to water supply was determined to be less than significant. Additionally, General Plan policies, including promotion of conservation and efficient use of water (Policy EM-5.3) and drought-resistant landscaping (Policy EM-5.5) have resulted in regulations aimed at increasing water efficiency and conservation with which the project would be required to comply. [26] The project would be required to comply with relevant fees intended to fund water supply and reduction measures. Therefore, the impact related to water supply would be ***less than significant***.

[26] City of San Carlos, *San Carlos 2030 General Plan EIR*, June 2009, p. 4.13-4, 4.13-7, and 4.13-8.

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

a-d) Wildfire Risk and Emergency Response

The project site is within the developed urban area of San Carlos, which has not been identified as a very high fire hazard severity zone.[27][28] The proposed project would have ***no impact*** related to wildfire.

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

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

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

a) Environmental Quality

With the implementation of mitigation measures Bio-1 to protect nesting birds during construction and Culture-1, -2 and -3 to address the potential discovery of currently unknown cultural or tribal cultural resources at the site, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. The project would not impact rare or endangered wildlife species, or eliminate important examples of the major periods of California history or prehistory.

b) Cumulative Impacts

All potential effects of the project were assessed in the context of area development, including specifically assessment of emissions impacts analyzed against cumulative thresholds per the Air district. The project would not result in adverse impacts that are individually limited but cumulatively considerable, including effects for which project-level mitigation were identified to reduce impacts to less than significant levels. Project-specific impacts would be less than significant with implementation of mitigation measures identified in this document, including mitigation

measure Air-1 to address construction period dust and emissions, and would not contribute in considerable levels to cumulative impacts.

c) Adverse Effects on Human Beings

The project would not result in substantial adverse effects on human beings, either directly or indirectly. Mitigation measures Air-1, Haz-1, and Haz-2 would minimize the potential for safety impacts related to construction-period emissions and disturbance of potentially hazardous materials. Mitigation measure Geo-1 requires appropriate foundation design and safe building construction. Therefore, the potential adverse effects on human beings would be less than significant with mitigation.

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City of San Carlos
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