

# Summary Form for Electronic Document Submittal

**Form F**

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

SCH #: 2017072047

Project Title: 557 East Bayshore Road Project

Lead Agency: City of Redwood City

Contact Name: Ryan Kuchenig

Email: rkuchenig@redwoodcity.org

Phone Number: 650-780-7239

Project Location: Redwood City

*City*

San Mateo

*County*

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

The project proposes to construct two five-story multifamily residential buildings (Buildings A and B) with 480 apartment units on the northern portion of the site and a 151,423 square-foot (sf) fitness center that consists of a 97,101 sf indoor gym (Villasport Building) and 54,322 sf for outdoor fitness center uses on the southeastern portion of the site. The southwestern portion of the site would be developed with a paved parking area. All existing improvements on the site would be removed to accommodate the proposed development.

The 14.36-acre project site is located at 557 East Bayshore Road in Redwood City. A vacant movie theater complex is located on the northwestern portion of the site with the remainder of the site occupied by a paved parking area currently used for temporary vehicle storage. The site is bordered by East Bayshore Road and U.S. Route 101 to the south, Smith Slough and Bair Island to the north, and commercial and light industrial uses such as car dealerships and a mini storage

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

- Air quality impacts during construction: mitigation via implementation of best management practices and specified equipment emissions standards to reduce criteria pollutants and health risks
- Biological resources impacts: mitigation via pre-construction surveys and establishment of necessary avoidance buffers.
- Transportation impacts: mitigation via an approved transportation demand management and annual monitoring plan to reduce vehicle miles traveled associated with the fitness center.

See attached EIR Summary for additional details.

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

Comments received on the Notice of Preparation published on July 1, 2019 and the revised NOP published on January 29, 2020 related to the following general topics:

- Traffic & Parking
- Air Traffic Noise
- Demolition and Construction Noise and Dust
- Emergency access
- Water Supply & Quality
- Recreation
- Wildlife Habitat
- Wetlands
- Sea Level Rise

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

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

## SUMMARY

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The 14.36-acre project site is located at 557 East Bayshore Road in Redwood City. A vacant movie theater complex is located on the northwestern portion of the site with the remainder of the site occupied by a paved parking area currently used for temporary vehicle storage.

The project proposes to construct two five-story multifamily residential buildings (Buildings A and B) on the northern portion of the site and a 151,423 square-foot (sf) fitness center that consists of a 97,101 sf indoor gym (Villasport Building) and 54,322 sf for outdoor fitness center uses on the southeastern portion of the site. The southwestern portion of the site would be developed with a paved parking area. All existing improvements on the site would be removed to accommodate the proposed development.

### Significant Impacts and Mitigation Measures

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

The project would not result in any significant unavoidable impacts.

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#### Summary of Impacts and Mitigation Measures

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Impact	Mitigation Measures
	<b>Air Quality</b>
<b>Impact AIR-2:</b> The project would not 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. <b>(Less than Significant Impact with Mitigation Incorporated)</b>	<b>MM AIR-2.1:</b> During any construction period ground disturbance, the applicant shall ensure that the project contractor implements the following standard BAAQMD BMPs: <ul style="list-style-type: none"><li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li><li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li><li>• All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li><li>• All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</li><li>• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.</li></ul>

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Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five 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.
- 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.
- Post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**MM AIR-2.2:** All construction equipment larger than 25 horsepower used at the site for demolition and earthwork phases that operate for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM (PM10 and PM2.5), if feasible. Otherwise:

- If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 70 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).
- Use of electrical or non-diesel fueled equipment.

Alternatively, the applicant may develop another construction operations plan demonstrating that the

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**Summary of Impacts and Mitigation Measures**

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<b>Impact</b>	<b>Mitigation Measures</b>
	<p>construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 70 percent or greater across all construction phases. Elements of the plan could include a combination of some of the following measures:</p> <ul style="list-style-type: none"> <li>• Use Tier 4 or alternatively fueled equipment,</li> <li>• Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors,</li> <li>• Use of electrically-powered equipment,</li> <li>• Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,</li> <li>• Change in construction build-out plans to lengthen phases, and</li> <li>• Implementation of different building techniques that result in less diesel equipment usage.</li> </ul> <p>Such an alternative construction operations shall be prepared by an air quality professional and submitted to the Community Development and Transportation Department for review and approval prior to issuance of grading permits.</p>
<p><b>Impact AIR-C:</b> The project would not result in a cumulatively considerable contribution to a significant air quality impact. <b>(Less than Significant Cumulative Impact with Mitigation Incorporated)</b></p>	<p>See <b>MM AIR-2.1</b> and <b>MM AIR-2.2</b> above</p>
<b>Biology</b>	
<p><b>Impact BIO-1:</b> The project would not 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 CDFW or USFWS. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p style="text-align: center;"><u>Impacts on Congdon’s Tarplant</u></p> <p><b>MM BIO-1.1:</b> <u>Pre-Activity Survey for Congdon’s Tarplant.</u> Prior to initial ground disturbance and during the appropriate blooming period (June through November), a focused survey for Congdon’s tarplant shall be conducted by a qualified plant ecologist within suitable habitat on the project site (i.e., areas of ruderal grassland and ruderal ditch bank grassland) and a 50-foot buffer around the project site. This buffer may be increased by the qualified plant</p>

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ecologist depending on site-specific conditions and activities planned in the area, but must be at least 50 feet wide for permanent impacts. Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust that cannot be effectively mitigated, such as grading; potential for project activities to alter hydrology supporting the habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away. The purpose of the survey will be to assess the presence or absence of Congdon's tarplant. If the target species is not found in the impact area or the identified buffer, then no further mitigation will be warranted. If Congdon's tarplant individuals are found within the survey area, then Mitigation Measures MM BIO-1.2 and MM BIO-1.3 shall be implemented.

**MM BIO-1.2: Avoidance Buffers.** To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent shall design and construct the project to avoid and minimize impacts on all populations of Congdon's tarplant on the project site or within the identified buffer of the impact area. Avoided Congdon's tarplant populations shall be protected by establishing and observing the identified buffer between plant populations and the impact area. If a reduced buffer is needed for temporary impacts, the qualified plant ecologist shall work with the project construction team to minimize temporary indirect impacts (e.g., watering of construction areas periodically during construction to minimize dust mobilization). All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, shall be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around Congdon's tarplant individuals to be avoided shall be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site). This marking shall be maintained intact and in good condition throughout project-related construction activities.

If complete avoidance is not feasible and more than 10 percent of a population (by occupied area or individuals) would be impacted as determined by a

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qualified plant ecologist then MM BIO-1.3, discussed below, shall be implemented.

**MM BIO-1.3: Preservation or Creation and Management of a Mitigation Population.** If avoidance of Congdon's tarplant is not feasible and more than 10 percent of the population would be impacted, compensatory mitigation shall be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To compensate for impacts on Congdon's tarplant, off-site habitat occupied by the species shall be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant affected, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10 percent significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to Congdon's tarplant beyond the 10 percent significance threshold) or establish an entirely new population in suitable habitat.

Areas proposed to be preserved as compensatory mitigation for impacts on Congdon's tarplant must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas shall be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat shall be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist in consultation with the City, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and shall contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands shall be ensured through an appropriate mechanism, such as a conservation

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easement or fee title purchase. A habitat mitigation and monitoring plan (HMMP) shall be developed and implemented for the mitigation lands. That plan shall include, at a minimum, the following information:

- a summary of habitat impacts and the proposed mitigation;
  - a description of the location and boundaries of the mitigation site and description of existing site conditions;
  - a description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for Congdon's tarplant;
  - a description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist);
  - proposed management activities to maintain high-quality habitat conditions for Congdon's tarplant;
  - a description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria shall include demonstration that any plant population fluctuations over the monitoring period of a minimum of five years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management);
  - if a new population is established, the new population must contain at least 200 individuals or the same number of impacted individuals, whichever is greater, by year five. This is to ensure the created population will be large enough to expect to persist and gain sufficient
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dedicated pollination services. If year five is a poor weather year for summer and fall-blooming annual plants and reference populations show a decline, this criteria can be measured in the next year occurring with average or better rainfall; and

- contingency measures for mitigation elements that do not meet performance criteria.

The HMMP shall be prepared by a qualified plant or restoration ecologist. Approval of the HMMP by the City will be required before project impacts on Congdon's tarplant occur.

### Impacts on Nesting Birds

**MM BIO-1.4:** Avoidance of the Nesting Season. To the extent feasible, commencement of demolition and construction activities shall be scheduled to avoid the nesting season. If demolition and construction activities are scheduled to take place outside of the nesting season, all potential demolition/construction impacts on nesting birds protected under the MBTA and California Fish and Game Code shall be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.

**MM BIO-1.5:** Pre-Activity/ Pre-Disturbance Surveys. If it is not possible to schedule demolition and construction activities between September 1 and January 31, then pre-activity surveys for nesting birds shall be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of demolition or construction activities. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, and buildings) in and immediately adjacent to the impact areas for nests.

**MM BIO-1.6:** Non-Disturbance Buffers. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300

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feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during the project implementation.

**MM BIO-1.7: Inhibition of Nesting.** If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1). This will preclude the initiation of nests in this vegetation, and minimize the potential delay of the project due to the presence of active nests in these substrates.

#### Impacts on Wildlife from Lighting

**MM BIO-1.8: Shielding of Lights.** All exterior lighting on the project site shall be shielded as needed to block illumination from shining upward, or outward into the muted tidal drainage ditch, Smith Slough, and Inner Bair Island to the north.

**MM BIO-1.9: Orientation of Lights.** Where lights are installed, they shall be directed downward and, in the northern part of the project site, inward toward the project site, away from marsh habitats to the north, thus limiting the amount of light spilling into natural areas outside of the project site.

**MM BIO-1.10: Minimize Exterior Lighting.** All exterior lighting used on the project site shall be Dark Sky Approved<sup>1</sup> lighting. To the extent consistent with the normal and expected operations of the project, take appropriate additional measures to avoid use of unnecessary lighting at night, especially during the bird migration season (February through May and August through November). Such measures may include the installation of motion-sensor lighting, automatic light shut-off mechanisms, participation in a lights-out program, and others. No red exterior lighting shall be used on the project site.

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

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#### Impacts due to Bird Collisions

**MM BIO-1.11: Implement Bird-Safe Building Design.** Due to the potential for certain facades of Buildings A and B to result in high numbers of bird collisions, the project shall implement the following bird-safe building design considerations for these facades (indicated in red in Figure 3.4-2):

- No more than 10 percent of the surface area of the combined red-outlined facades of Buildings A and B shall have untreated glazing between the ground and 60 feet above ground. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Vertical elements of the window patterns shall be at least 0.25 inches wide at a maximum spacing of four inches or have horizontal elements at least 0.125 inches wide at a maximum spacing of two inches. Any remaining untreated glazed areas shall be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.
- Reduce or eliminate the visibility of landscaped areas behind glass.
- Avoid free-standing clear glass walls, skywalks, transparent building corners, glass enclosures (e.g., greenhouses) on rooftops, and balconies with unbroken glazed segments 24 square feet and larger where feasible. If any such features are included in the façade areas of Buildings A and B indicated in red on Figure 3.4-2, all glazing used in any such features shall be 100 percent treated.
- Landscaping, including planted vegetation and water features, shall be designed to minimize the potential for collisions adjacent to the red-outlined facades. For example, vegetation providing particularly valuable resources to birds (such as fruits) shall be planted away from the facades, and vegetation in general shall be planted in such a way that is not clearly reflected in windows. Water features shall be located away from building exteriors to reduce the attraction of birds toward glazed facades.

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**Summary of Impacts and Mitigation Measures**

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**Impact**

**Mitigation Measures**

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Impacts to the Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew

**MM BIO-1.12: Worker Environmental Awareness Program.** Before any construction activities begin, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include descriptions of the salt marsh harvest mouse and salt marsh wandering shrew, their habitats, the laws protecting them, the general measures that are being implemented to conserve these species as they relate to the project, and the boundaries within which the project may be accomplished.

**MM BIO-1.13: Herbaceous Cover Removal.** Prior to the start of project activities below the top of bank of the muted tidal drainage ditch, herbaceous vegetation shall be removed from impact areas to eliminate cover for salt marsh harvest mice and salt marsh wandering shrews, thereby discouraging them from occurring in impact areas. Vegetation removal shall start where the habitat intersects the project site in its northeastern corner, and shall proceed gradually northwest towards the open marsh habitat to the west. Vegetation shall not be removed during a high tide or king tide event that temporarily inundates the drainage ditch, as these are the conditions in which salt marsh harvest mice and salt marsh wandering shrews are most likely to be present on the project site. A qualified biologist familiar with the biology of these species shall conduct a pre-construction survey prior to vegetation removal, and shall monitor the vegetation removal process. Vegetation shall be removed using hand-held equipment (e.g., weed-whackers). This will allow any small mammals, including salt marsh harvest mice and salt marsh wandering shrews, to escape the project impact area under the cover of vegetation, and will encourage movement of such small mammals towards available vegetated habitat to the north outside the project site. All herbaceous vegetation that could potentially conceal a salt marsh harvest mouse or salt marsh wandering shrew within the project impact area shall be removed. All vegetation that is removed shall be hauled off-site the day it is removed, and shall not be left on the site to provide potential cover for small mammal species.

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**MM BIO-1.14: Exclusion Barrier.** The area of vegetation removal shall extend to the boundary of the work area (i.e., the edge of ruderal ditch bank grassland habitat) along the muted tidal drainage ditch, and shall not extend into the marsh vegetation. After removal of the vegetation and prior to the start of construction activities below top of bank, a barrier shall be installed at the easternmost, westernmost, and northernmost limits of the work area below the top of bank within the muted tidal drainage ditch to exclude salt marsh harvest mice and salt marsh wandering shrews from the project site. This barrier, which shall be shown on the project plans and shall be constructed under the guidance of a qualified biologist, shall consist of a three-foot tall, tight cloth, smooth plastic, or sheet-metal (or similar material approved by the USFWS) fence toed into the soil at least 3 inches deep and supported with stakes placed on the inside of the barrier. A qualified biologist shall conduct a preconstruction survey of the area where vegetation was removed prior to construction access, and shall monitor the installation of the barrier. Following the installation of the barrier, designated construction personnel shall check its integrity each morning that construction activities occur, and shall initiate repairs immediately as needed.

**MM BIO-1.15: Environmentally Sensitive Area Fencing.** Within the banks of the muted tidal drainage ditch, the project limits shall also be clearly demarcated with Environmentally Sensitive Area fencing to avoid inadvertent disturbance of any habitat outside of the designated construction area during construction activities. This fencing can be combined with the exclusion barrier but must not be outside that barrier.

**MM BIO-1.16: Immediate Work Stoppage.** If a salt marsh harvest mouse or salt marsh wandering shrew, or an animal that could be a harvest mouse or wandering shrew (e.g., a similar species of mouse or shrew), is observed on the project site during project activities, all work that could result in the injury or death of the individual shall stop immediately and the qualified biologist shall be immediately notified. The animal shall be allowed to leave the area on its own and shall not be handled.

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**MM BIO-1.17: Planting of High Tide Refugial Habitat.** Following project grading, 0.3 acre of habitat within the muted tidal drainage ditch shall be planted with California native plants. Existing conditions within this area provide 0.4 acre of relatively low-quality habitat for salt marsh harvest mice and salt marsh wandering shrews, consisting of nonnative ruderal grasses and weeds that are maintained by mowing. To ensure that habitat conditions following project construction provide equivalent or better functions and values compared to existing conditions, the project shall implement the following measures:

- No trails or hardscape features shall be constructed within the 0.3-acre temporary impact area (as depicted on Figure 3.4-1) below the top of the bank of the muted tidal drainage ditch; a low (i.e., two to three foot tall) fence and signage shall be installed along the southern edge of this area to exclude people and dogs from this area.
- The 0.3-acre landscape area below the top of the bank of the muted tidal drainage ditch shall be vegetated exclusively with low-growing, non-woody California native vegetation (e.g., the California native grasses, vines, and forbs shown on the project plans).
- The project shall implement a three-year maintenance plan that includes irrigation and weed control to prevent further spread or introduction of invasives, and ensure that 100 percent cover of low-growing, non-woody vegetation is achieved within the 0.3-acre landscape area below the top of the bank of the muted tidal drainage ditch.

The extent of high-tide refugial and foraging habitat for salt marsh harvest mice and salt marsh wandering shrews below the top of bank of the muted tidal drainage ditch will be reduced from 0.4 acre to 0.3 acre following project construction. However, the quality of the existing habitat in this area is very low, nonnative, invasive plant species that are maintained by mowing. Following construction, the 0.3-acre area below the top of bank will be planted with low-growing, non-woody California native grasses and forbs at a density of 100 percent cover. As a result,

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although the overall habitat area will be slightly smaller, the improved quality of the vegetative community will be higher and will provide more suitable refugial and foraging habitat for salt marsh harvest mice and salt marsh wandering shrews compared to the current habitat.

**MM BIO-1.18:** Development of Integrated Invasive Weed Management Program for Maintenance of the Landscaping Along the Muted Tidal Ditch. The applicant shall develop an Integrated Invasive Weed Management Program for the maintenance of the landscaping along the muted tidal drainage ditch on the project site. The Program shall identify alternatives to biocides and prioritize the use of non-chemical techniques to control weed and landscaping pests. If herbicides are required for use in this area, only those approved for use near aquatic habitats would be allowed, and all herbicides would be applied by a licensed Pest Control Advisor. The project shall provide a reporting and monitoring program for pest management, and require that the Program be adopted as part of any development transfer or management agreement.

**MM BIO-1.19:** Prohibit Outdoor Cats and Off-Leash Dogs. Outdoor cats and off-leash dogs shall be prohibited on the property following project construction. This measure shall be enforced by the property owner.

**MM BIO-1.20:** Food Waste Management. The following measures shall be implemented to minimize impacts on salt marsh harvest mice and salt march wandering shrews due to the attraction of nuisance predators to the project site:

- Any bins used for food waste shall include lids that seal tightly to prevent access by animals and incorporate a mechanism to prevent them from being inadvertently left open when not in active use.
  - Outdoor trash and recycling receptacles shall be routinely emptied throughout the day by the janitorial service, thus ensuring that cans do not fill up and allow food waste to spill out.
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**Summary of Impacts and Mitigation Measures**

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<b>Impact</b>	<b>Mitigation Measures</b>
	<ul style="list-style-type: none"> <li>• The janitorial service shall ensure that any litter on the site is picked up daily, and no food trash is left on-site overnight.</li> <li>• Signs shall be placed on trash receptacles reminding users to close lids so that they will not be inadvertently left open.</li> <li>• Residents and visitors shall be prohibited from feeding feral or wild mammals, including feral cats, on the property.</li> <li>• Educational signs shall be posted explain the importance and sensitivity of nearby marsh habitats, prohibiting feeding wildlife (including feral cats) on the property, and prohibiting outdoor cats and off-leash dogs. In addition, signs shall advise residents and visitors to dispose of food waste in outdoor areas appropriately to avoid attracting and subsidizing nuisance species.</li> </ul>
<p><b>Impact BIO-2:</b> The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p><b>MM BIO-2.1:</b> <u>Implement Invasive Weed BMPs.</u> The invasion and/or spread of noxious weeds will be avoided by the use of the following invasive weed BMPs:</p> <ul style="list-style-type: none"> <li>• The use of moderate or highly invasive and/or noxious weed for landscaping (from the planting plan, asparagus fern [<i>Asparagus</i> sp.], rated moderately invasive) is prohibited.</li> <li>• During project construction, all seeds and straw materials used on-site will be weed-free rice (or similar material acceptable to the City) straw, and all gravel and fill material will be certified weed-free to the satisfaction of the City. Any deviation from this will be approved by the City.</li> <li>• During project construction, vehicles and all equipment will be washed (including wheels, undercarriages, and bumpers) before and after entering the proposed project footprint. Vehicles will be cleaned at existing construction yards or legally operating car washes.</li> <li>• Following construction of project, a standard erosion control seed mix (acceptable to the City) from a local source will be planted within the temporary impact zones on any disturbed ground that will not be under hardscape, landscaped, or maintained. This will minimize the potential for</li> </ul>



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## Summary of Impacts and Mitigation Measures

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Impact	Mitigation Measures
	the germination of the majority of seeds from non-native, invasive plant species.
<b>Impact BIO-C:</b> The project would not result in a cumulatively considerable contribution to a significant biological resources impact. <b>(Less than Significant Cumulative Impact with Mitigation Incorporated)</b>	See <b>MM BIO-1.1 – 1.20 and MM BIO-2.1</b> above.
<b>Transportation</b>	
<b>Impact TRN-2:</b> The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). <b>(Less than Significant Impact with Mitigation Incorporated)</b>	<b>MM TRN-2.1:</b> The project shall incorporate additional TDM measures into the proposed TDM plan sufficient to demonstrate that VMT associated with the fitness center would be reduced to 15.0 or less per employee. The following is a feasible method for achieving the required VMT reduction: <ul style="list-style-type: none"><li data-bbox="755 955 1430 1165">• Provide financial incentives for employees and/or patrons that utilize alternative modes of transportation to travel to and from the site (i.e., parking cash outs, carshare/bikeshare memberships and/or subsidies, transit subsidies, etc.).</li></ul> <p>The TDM plan shall be submitted and approved by the Community Development and Transportation Department, and shall be monitored annually to gauge its effectiveness in meeting the required VMT reduction. A transportation professional working at the City’s direction and pursuant to a scope of work approved by the City Engineer shall conduct traffic counts annually to measure the daily and peak-hour entering and exiting vehicle volumes. The volumes will be compared to the trip thresholds to determine whether the reduction in vehicle trips is being met. In addition to monitoring driveway volumes, a survey will be developed by the transportation professional to determine actual mode splits for employees and patrons of the fitness center. The survey will also gather information on usage of individual TDM plan components. The results of the annual vehicle counts and survey will be reported in writing by the transportation professional to the Community Development and Transportation Department.</p>

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## Summary of Impacts and Mitigation Measures

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Impact	Mitigation Measures
	<p>If TDM plan monitoring results show that the trip reduction targets are not being met, the TDM plan shall be updated to identify replacement and/or additional feasible TDM measures to be implemented. The updated TDM plan shall be subject to the same approvals and monitoring requirements listed above.</p> <p>If monitoring and reporting demonstrates that the project is non-compliant (i.e, did not fulfill the requirements of the TDM plan, meet the drive-alone reduction targets, etc.), the City as the enforcing agency may impose penalties including fines and/or permit limitations.</p>
<b>Impact TRN-C:</b> The project would not result in a cumulatively considerable contribution to a significant transportation impact. <b>(Less than Significant Cumulative Impact with Mitigation Incorporated)</b>	See <b>MM TRN-2.1</b> above.

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## Project Alternatives

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

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

1. Redevelop the 14.36-acre site to allow for the creation of a mixed-use waterfront project.
2. Construct up to 480 residential units including 85 below market rate in two buildings.
3. Construct a commercial use fitness center with up to 97,101 square feet of indoor uses and 51,209 square feet of outdoor uses.
4. Provide pedestrian and bicycle circulation around and through the site.
5. Enhance public connectivity to the Bay Trail as neighboring properties redevelop by providing a new walkway.

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

1. Meet the City’s strategic priority to increase housing supply (480 units) and affordable rental housing (85 BMR units)
2. Create an attractive link and gateway to the bayfront area as intended by the General Plan designation for the area.
3. Allow for a mixed-use redevelopment of an underutilized commercial site within a transitional neighborhood of more walkable and residential uses.
4. Ensure development accounts for climate change, sea level rise and complies with BCDC requirements.
5. Provide public access along water edges, to public open spaces and trails, and to vista points as integral parts of neighborhood development.

### Project Alternatives Considered but Rejected

The following alternatives were considered for the project but rejected.

#### *Residential Development Only Alternative*

A residential development only would eliminate the commercial use, and just provide housing. This alternative would assume additional residential development would occur in the southeastern portion of the site where commercial uses are currently proposed. The location of the residential building cannot change due to the Mixed-Use Waterfront designation of the parcel adjacent to the water which allows for residential development within the project site. This alternative would eliminate Impact TRN-2. The mitigation measures required to bring Impact AIR-2, Impact BIO-1, and Impact BIO-2

to a less than significant level would still be required. Therefore, a residential development only alternative was considered but rejected.

#### *Commercial Development Only Alternative*

A commercial development only would eliminate the residential use, and just provide commercial uses. This alternative would assume additional commercial development would occur in the northern portion of the site where residential uses are currently proposed. This alternative would not reduce the need for any of the proposed mitigation measures. Additionally, this alternative would not be in compliance with the General Plan land use designations for the site. In addition to not meeting the Mixed-Use Waterfront designation, a project without residential development would not address RHNA needs or address the City Council’s strategic priority for housing. Therefore, a commercial development only alternative was considered but rejected.

#### *Location Alternative*

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

#### No Project Alternatives

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

#### *No Project – No Development Alternative*

The No Project – No Development Alternative would retain the existing commercial buildings and surface parking lots, with the buildings assumed under this alternative to continue to remaining vacant. Implementation of the No Project – No Development alternative would avoid the less than significant impacts with mitigation identified in this EIR. The No Project No-Development alternative would not, however, allow for new waterfront, high density, mixed-use development to be constructed on the project site consistent with the General Plan. A project without residential development would also not address RHNA needs or address the City Council’s strategic priority for housing. This alternative does not meet any of the objectives of the proposed project.

### *No Project - Existing Plans and Policies Alternative*

The No Project-Existing Plans and Policies Alternative would assume the currently proposed project is not approved, and a different project is proposed based on what the General Plan currently allows. An alternative project that is consistent with the General Plan would allow for commercial development on the southern portion of the property and for mixed-use development on the northern portion of the property. The alternative project could potentially be similar in scale to or larger than the proposed development, as allowed under the General Plan. Based on allowed development capacities on the site, an alternative project could construct up to 507 residential units (422 base units plus 85 bonus) and up to 111,064 square feet of commercial uses, which would result in a greater level of development than the proposed project. The alternative may or may not provide affordable housing to the City in the same amount proposed by the project.

The environmental effects of redevelopment the site with a different development project consistent with the General Plan would likely result in similar construction and operational effects as the proposed project. To the extent more intense development were to be proposed beyond what is currently pending with the subject project application, construction and operational effects could be increased.

### *No Project - Refurbishing Existing Development Alternative*

The No Project- Refurbishing Existing Development Alternative would assume the currently vacant movie theatre and parking lot are refurbished and reopened for use. Under this alternative, the existing vacant movie theater building could be re-occupied with a theater use or with another commercial use allowed by the current *CG – General Commercial* zoning. The existing development, based on its location on the site, does not comply with the underlying Mixed-Use Waterfront General Plan designation. Options to reuse or expand the existing development for commercial uses could be limited or restricted. Implementation of the No Project-Existing Development Refurbishing Alternative would avoid the less than significant impacts with mitigation identified in this EIR. The No Project-Existing Development Refurbishing Alternative would not, however, allow for new waterfront, high density, mixed-use development to be constructed on the project site consistent with the General Plan. This alternative does not meet any of the objectives of the proposed project.

### Design Alternative-Reduced Building Height of Residential Buildings

According to the Biological Resource Report, the greatest risk of bird collisions with buildings occurs in the area within 40-60 feet off the ground because this is the area in which most bird activity occurs. The project has a maximum proposed height of approximately 55 feet. The reduced building height alternative would reduce the number of floors within the residential buildings to four, reducing the building height to a maximum of 45 feet. Based on the currently proposed floor plans, removing the fifth floor from each residential building would result in a reduction of 102 residential units, leaving the project with a total of 378 units.

While this alternative would reduce the potential for bird strikes, it would result in similar impacts to other sensitive biological resources (Congdon's tarplant, nesting birds, the spread invasive weeds, reduction in proposed landscaping, nighttime lighting disturbance, and impacts to the salt marsh harvest mouse and salt marsh harvest shrew. This alternative may reduce construction NOx

emissions slightly, but not to the point where the identified mitigation would no longer be required. Additionally, the significant VMT impact associated with the proposed fitness center would still occur.

#### Design Alternative-Residential Building Connection

This design alternative would remove the walkway between Building A and Building B and connect the two residential buildings. The alternative would prevent birds from colliding into the facades between the two residential buildings, as it would close off the flight path between the two buildings.

While this design alternative would reduce the potential for bird strikes, it would result in similar impacts to other sensitive biological resources (Congdon's tarplant, nesting birds, the spread invasive weeds, nighttime lighting disturbance, and impacts to the salt marsh harvest mouse and salt marsh harvest shrew. Also, depending on the final design, this alternative may conflict with BCDC view corridor requirements. Additionally, the significant VMT impact associated with the proposed fitness center would still occur.

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

Concerns from local residents, property owners, organizations, or agencies about the project were related to biological resources, greenhouse gas emissions, noise, transportation, tribal cultural resources, and utilities.

Throughout the community outreach process, residents in the neighborhoods adjacent to the project voiced concerns about emergency access in the project area due to the limited number of roadway connections.