RESOLUTION NO. PTC 2025-__

RESOLUTION OF THE PLANNING AND TRANSPORTATION COMMISSION OF THE CITY OF SAN CARLOS RECOMMENDING THAT THE CITY COUNCIL CERTIFY THE ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SAN CARLOS 2045 GENERAL PLAN RESET PROJECT

WHEREAS, in July 2023 the City Council of the City of San Carlos approved a Professional Services Agreement with PlaceWorks for consulting services to prepare an update to the 2030 General Plan and an Environmental Impact Report (EIR), altogether referred to as the "2045 General Plan Reset Project", to reset the development projections to the year 2045 for citywide commercial, office, industrial and residential uses in response to the continued development interest in the City's East Side and two new specific plans underway in the City; and

WHEREAS, the City prepared the revised development projections to the year 2045 to inform the General Plan update and on June 3, 2024 released a Notice of Preparation of EIR and solicited public input from June 3, 2024, to July 3, 2024 on the scope of EIR; and

WHEREAS, on June 17, 2024, the City conducted a Public Hearing at the Planning and Transportation Commission's regular meeting to present the development projections and solicit input on the scope of the environmental review of the project; and

WHEREAS, the City conducted stakeholder group meetings between September 2024 and October 2024 to solicit input on the project; and

WHEREAS, pursuant to a request from the Costanoan Rumsen Carmel Tribe on the scope of environmental review, a meeting was held on September 25, 2024 to receive their input; and

WHEREAS, amendments to the General Plan and Draft EIR were prepared for the proposed 2045 General Plan Reset Project and circulated for a 45-day public review from January 17, 2025, to March 3, 2025 to solicit agency and public input on the analysis of the potential environmental effects associated with the implementation of the project and amendments to the General Plan; and

WHEREAS, on February 3, 2025, the City conducted a public hearing at the Planning and Transportation Commission's regular meeting to present the proposed General Plan amendments and findings of the Draft EIR and solicit input from the public and Planning and Transportation Commission on the project; and

WHEREAS, on February 24, 2025, the City Council held a Study Session to review the proposed General Plan amendments and Draft EIR and provided comments to staff; and

WHEREAS, the 2045 General Plan Reset includes amendments to the Introduction, Land Use Element, Circulation and Scenic Highways Element, Environmental Management Element, Parks and Recreation Element, and Noise Element of the General Plan and the Draft EIR (Exhibit A) and Final EIR (Exhibit B) which together constitute the EIR for the project; and

WHEREAS, the Findings of Fact (Findings) and Statement of Overriding Considerations (SOC) presented herein address the environmental effects associated with the Project that are described and analyzed within the EIR. These Findings have been made pursuant to California Environmental Quality Act (CEQA; California Public Resources Code Section 21000 et seq.), specifically Public Resources Code Sections 21081 and 21081.6, as well as the CEQA Guidelines (14 CCR 15000 et seq.) Sections 15091 and 15093; and

WHEREAS, Further, in accordance with Public Resources Code Section 21081 and CEQA Guidelines Section 15093, whenever significant effects cannot be mitigated to below a level of significance, the City as the decision-making agency is required to balance, as applicable, the benefits of the project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse effects may be considered "acceptable," in which case the lead agency must adopt a formal Statement of Overriding Considerations; and

WHEREAS, the EIR identified potentially significant and unavoidable environmental effects that could result from the implementation of the project. Those effects are related to air quality, greenhouse gas emissions, transportation, and wildfire. Since potentially significant and unavoidable impacts associated with the project were identified, a Statement of Overriding Considerations is required; and

WHEREAS, pursuant to the California Environmental Quality Act ("CEQA"), on May 5, 2025, the City of San Carlos Planning and Transportation Commission held a duly noticed public hearing to consider the adopting a resolution recommending that the City Council certify the Environmental Impact Report ("EIR") for the San Carlos 2045 General Plan Reset project; make findings relating to significant impacts, mitigation measures and alternatives, and adopt a Statement of Overriding Considerations; and adopt a Mitigation Monitoring and Reporting Program.

NOW, THEREFORE, BE IT FOUND, DETERMINED AND RESOLVED BY THE PLANNING AND TRANSPORTATION COMMISSION THAT:

1. The above recitals and findings are hereby incorporated by this reference and are hereby approved.

2. Having received, reviewed, and considered the information in the EIR for this project, as well as the supporting administrative record, the City hereby makes the findings set forth herein pursuant to, and in accordance with, Sections 21081, 21081.5, and 21081.6 of the Public Resources Code.

3. Environmental Effects Found Not to be Significant

   The subject program-level EIR is intended to serve as a public information and disclosure document identifying and analyzing those environmental impacts resulting from the project that are expected to be significant and describing mitigation measures

and alternatives that could avoid or reduce significant adverse impacts and increase beneficial effects. Through project scoping and the environmental analysis contained within the EIR, it was determined that the Project would not result in a potential significant effect on the environment with respect to aesthetics, biological resources, cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, parks and recreation, population and housing, public services, tribal cultural resources, and utilities and service systems. Therefore, no further findings are required for these subject areas.

4. Findings for Significant and Unavoidable Effects

Pursuant to Public Resources Code Section 21081 and California Environmental Quality Public Resources Code 21081 and 21081.5, and CEQA Guidelines Section 15093, require that the City balance the economic, legal, social, technological, or other benefit of a proposed project against its unavoidable environmental effects when determining to approve a project. And if specific economic, legal, social, technological, or other benefits outweigh the unavoidable adverse environmental effect, the adverse effects may be considered "acceptable."

Potential significant and unavoidable impacts related to air quality, greenhouse gas emissions, transportation, and wildfire were identified for the project. The Findings of Fact are included in Exhibit C.

5. Statement of Overriding Considerations

The Planning and Transportation Commission recommends the City Council of the City of San Carlos adopt and make the following Statement of Overriding Considerations regarding the significant, unavoidable impacts of the 2045 General Plan Reset and the anticipated benefits of the proposed project.

CEQA requires decision-makers to balance the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable impacts when determining whether to approve the project. If the specific benefits of a project outweigh the unavoidable adverse environmental effects, those effects may be considered acceptable, and the agency must state the specific reasons to support the action in a "statement of overriding considerations" supported by substantial evidence in the record (CEQA Guidelines §15093, Statement of Overriding Considerations). Pursuant to CEQA Guidelines §15093, the City Council must adopt a Statement of Overriding Considerations for the significant and unavoidable impacts of the proposed project in connection with approval of the proposed project. The City Council finds that even with mitigation, implementation of the project carries with it significant and unavoidable environmental effects, as identified in the EIR and summarized below.

Adoption of the proposed project would result in the following significant and unavoidable impacts:

Impact AQ-2.1: Construction of development projects within the buildout horizon of the proposed project could generate emissions that **could** exceed the Bay Area Air District's (Air District) regional significance thresholds and cumulative contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.

Impact AQ-2.2: Operation of development projects under the proposed project could generate operational emissions that exceed the Bay Area Air District's (Air District) regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO_X).

Impact AQ-3: Construction emissions associated with future development projects could expose air quality-sensitive receptors to substantial toxic air contaminant concentrations and exceed the Bay Area Air District's (Air District) project-level and cumulative significance thresholds.

Impact GHG-1: Implementation of the proposed project could exceed the greenhouse (GHG) emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under Senate Bill (SB) 32 or the carbon neutrality goal under Assembly Bill (AB) 1279.

Impact TRAN-2: The proposed project could exceed the City's VMT significance criteria by generating VMT per service, per capita, and per employee that exceeds a threshold of 15 percent less than the regional average and by increasing total countywide VMT.

Impact WILD-2: Future development during the buildout horizon of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

Impact WILD-5: Future development during the buildout horizon of the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas, Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface (WUI), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

<u>Overriding Considerations:</u>

The Planning and Transportation Commission Recommends the City Council carefully consider each significant, unavoidable project impact in reaching its decision to approve the proposed project. Even with mitigation, the City Council should recognize that implementation of the proposed project could carry with it unavoidable adverse environmental effects, as identified in the EIR. The City Council should specifically find that, to the extent that the identified significant adverse impacts for the proposed project have not been reduced to acceptable levels through feasible mitigation or alternatives, there are specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, that outweigh the project's significant unavoidable impacts and support approval of the proposed project. Any one of these benefits, as set forth below, is sufficient to justify approval of the proposed project. The substantial evidence supporting the various benefits is in the record as a whole.

The following statements identify the reasons why, in the City's judgment, specific benefits of the proposed project outweigh the possibility of the significant and unavoidable effects. The City finds that each of the proposed project benefits discussed below is a separate and independent basis for these findings. The reasons set forth below are based on the EIR and other information in the administrative record.

Economic Benefits:

1. The proposed project would support local shops, businesses, and services.
2. The proposed project would support and incentivize property investment and redevelopment, which would increase property values and revenue to support City services. This process would benefit the local shops, businesses, services, employees, and residents.
3. By extending the General Plan horizon to 2045, the proposed project would provide comprehensive environmental review for continued redevelopment and business development in the city, allowing for more efficient project-level environmental review.

Legal Benefits:

4. The proposed project would ensure that the City's General Plan is legally adequate and addresses topics required by State law.

Social Benefits:

5. The proposed project would plan for adequate housing capacity to accommodate the City's Regional Housing Needs Allocation (RHNA) now and into the future.
6. The proposed project would encourage new businesses that residents need and enjoy, while fostering a sense of place within the community where residents and visitors can socialize.
7. The proposed project would promote the creation of guidance for the protection of areas of archeological sensitivity.

Technological Benefits:

8. The proposed project would guide redevelopment in a manner consistent with up-to-date California Building Code Standards, Energy Efficiency Standards, and Cal Green requirements.

Environmental Benefits:

9. The proposed project would promote an update to the Climate Action Plan to meet the GHG reduction targets.
10. The proposed project would protect open spaces and natural habitats, increase the planting and maintenance of street trees, maintain the City's urban forest, invest in natural infrastructure, and expand access to parks and open space.
11. The proposed project would encourage a modal shift to reduce vehicular trip generation from new development.
12. The proposed project would continue to implement the City's adopted Bicycle and Pedestrian Master Plan adopted on June 9th, 2020 and update the Master Plan as needed.

13. The proposed project would continue to implement the City's adopted East Side Innovation District Vision Plan adopted on October 25, 2021.
14. The proposed project would implement and enforce the Transportation Demand Management Ordinance and support Transportation Demand Management measures in new development to reduce traffic impacts.
15. The proposed project would establish clear actions to protect the community from flooding, wildfires, and earthquakes by reinforcing the City's emergency readiness and response capabilities, increasing power system resilience, maintaining a state-of-the art emergency notification system, providing community training programs, and planning ahead for disaster recovery.
16. The proposed project would require that major new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes.
17. The proposed project would continue to support trail connections as identified in the City's Potential Trail Connections Plan.

6. Mitigation Monitoring and Reporting Program

    a. As referenced in the Findings (Exhibit C), a MMRP has been prepared for the project and is to be adopted concurrently with these findings and statement of overriding considerations pursuant to Public Resources Code Section 21081. The MMRP is a separate stand-alone document that will be used by the City to track compliance with the project mitigation measures. The MMRP will remain available for public review during the compliance period, which includes pre-construction coordination, construction, and post-construction documentation for future development projects. (Exhibit D).

7. Adoption

    a. The Planning and Transportation Commission recommends that the City Council certify the Environmental Impact Report for the City of San Carlos's 2045 General Plan Reset project (Exhibit A and B).

Passed and adopted as Resolution of the Planning Commission of the City of San Carlos at a regular meeting thereof held on the 5th day of May, 2025, by the following vote:

AYES, PLANNING AND TRANSPORTATION COMMISSION MEMBERS: _____
NOES, PLANNING AND TRANSPORTATION COMMISSION MEMBERS: _____
ABSENT, PLANNING AND TRANSPORTATION COMMISSION MEMBERS: _____

_____
CHAIR, Planning and Transportation Commission

ATTEST:

_____

PLANNING MANAGER, City of San Carlos

Exhibit A

City of San Carlos
2045 General Plan Reset Project

Draft Environmental Impact Report

Found at the following site:

cityofsancarlos.org/2045GeneralPlanReset

The Draft EIR contains the following documents:

- Draft Environmental Impact Report (DEIR)
- Appendix A: Notice of Preparation and Scoping Comments
- Appendix B: Air Quality and Greenhouse Gas Emissions Data
- Appendix C: Noise Data
- Appendix D: Transportation Data
- Appendix E: Proposed General Plan Policy Amendments

Exhibit B

City of San Carlos
2045 General Plan Reset Project

Final Environmental Impact Report

Found at the following site:

cityofsancarlos.org/2045GeneralPlanReset

The Final EIR contains the following documents:

- Final EIR
- Appendix E: Revised Proposed General Plan Amendments
- Appendix F: Comments Received on the Draft EIR

EXHIBIT C: FINDINGS OF FACT

Findings Regarding Significant Impacts and Mitigation Measures

Pursuant to Public Resources Code Section 21081 and California Environmental Quality Act (CEQA) Guidelines Section 15091, the City of San Carlos hereby makes these findings with respect to the potential for significant environmental impacts from approval and implementation of the proposed 2045 General Plan Reset ("proposed project") and the means for mitigating those impacts. For the purpose of these findings, the term “Environmental Impact Report” (EIR) refers to the Draft EIR and Final EIR documents collectively, unless otherwise specified.

These findings do not attempt to describe the full analysis of each environmental impact contained in the EIR. Instead, the findings provide a summary description of each impact, describe the applicable mitigation measures identified in the EIR and adopted by the City, and state the findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the EIR. These findings hereby incorporate by reference the discussion and analysis in the EIR that support the EIR’s determinations regarding significant project impacts and mitigation measures designed to address those impacts. The facts supporting these findings are found in the record as a whole for the project.

In making these findings, the City ratifies, adopts, and incorporates into these findings the analysis and explanation in the EIR, and ratifies, adopts, and incorporates into these findings the determinations and conclusions of the EIR relating to environmental impacts and mitigation measures, except to the extent that any such determinations and conclusions are specifically and expressly modified by these findings. As shown below, all impacts would have a significant and unavoidable impact.

AIR QUALITY

Impact AQ-2.1: Construction of development projects within the buildout horizon of the proposed project could generate emissions that could exceed the Bay Area Air District’s (Air District) regional significance thresholds and cumulative contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.

Impact AQ-2.1: Construction of development projects within the buildout horizon of the proposed project could generate emissions that could exceed the Bay Area Air District’s (Air District) regional significance thresholds and cumulative contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.

Mitigation Measure AQ-2.1: Prior to discretionary approval by the City for development projects subject to CEQA (California Environmental Quality Act) review (i.e., discretionary, nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with current Air District methodology for assessing air quality impacts identified in the Air District’s *CEQA Air Quality Guidelines*. If construction-related criteria air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require feasible mitigation measures to

reduce air quality emissions. Measures shall require implementation of current Air District Best Management Practices for construction-related fugitive dust emissions. At the time of preparation of this EIR, such practices include:

- Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) at least twice daily or as often as needed to control dust emissions.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seedling or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compact layer of wood chips, mulch, or gravel.
- Prior to the commencement of construction activities, individual project proponents shall 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. The Air District phone number shall also be visible to ensure compliance with applicable regulations.

Measures shall be incorporated into appropriate construction documents (e.g., construction management plans) and shall be verified by the City.

Finding: Potential future development projects (individually or cumulatively) could still exceed the Air District significance thresholds for construction. Therefore, implementation of the proposed project could result in significant and unavoidable construction-related regional air impacts from construction equipment exhaust. This finding does not preclude a finding of less-than-significant impacts at the project level.

Rationale for Finding: Mitigation Measure AQ-2.1 contains the Air District's "Basic Construction Mitigation Measures Recommended for All Proposed Projects" in the bullet points listed above and contained in the Air District's 2023 CEQA Air Quality Guidelines, which are recommended by the Air District to ensure construction fugitive dust emissions are less than significant. As such, fugitive dust emissions would be reduced with implementation of Mitigation Measure AQ-2.1. While Mitigation Measure AQ-2.1 has the potential to reduce construction emissions, potential future development projects (individually or cumulatively) could still exceed the Air District significance thresholds for construction. Therefore, implementation of the proposed project could result in significant and unavoidable construction-related regional air impacts from construction equipment exhaust. This finding does not preclude a finding of less-than-significant impacts at the project level.

Resulting Significance: Significant and Unavoidable

Impact AQ-2.2: Operation of development projects under the proposed project could generate operational emissions that exceed the Bay Area Air District's (Air District) regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NOX).

Mitigation Measure AQ-2.2: Prior to discretionary approval by the City for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operational air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with Air District methodology in assessing air quality impacts identified in the Air District's current CEQA Air Quality Guidelines at the time that the project is considered.

If operation-related air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require the project applicant(s) to incorporate mitigation measures to reduce air pollutant emissions to comply with applicable significance threshold standards during operational activities. The identified measures shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA review. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:

- Implementing commute trip reduction programs.
- Unbundling residential parking costs from property costs.
- Expanding bikeway networks.
- Expanding transit network coverage or hours.
- Using cleaner-fueled vehicles.
- Exceeding the current Title 24 Building Envelope Energy Efficiency Standards.
- Establishing on-site renewable energy generation systems.
- Requiring all-electric buildings.
- Replacing gas-powered landscaping equipment with zero-emission alternatives.
- Implementing organics diversion programs.
- Expanding urban tree planting.

Finding: Implementation of the proposed project could generate emissions that would exceed the Air District's regional significance thresholds for VOC and NOX. Due to the programmatic nature of the proposed project, no additional mitigating measures are available, and the impact is considered significant and unavoidable.

Rationale for Finding: Mitigation Measure AQ-2.2 would reduce air pollutant emissions to the extent practicable. The proposed 2045 General Plan Reset contains goals and policies covering topics such as expansion of the pedestrian and bicycle networks, promotion of public and active transit, and support to increase building energy efficiency and energy conservation would also reduce criteria air pollutants within the EIR Study Area. However, at the programmatic level, it is

not feasible to quantify the increase in toxic air contaminants (TAC) from stationary sources associated with the proposed project or meaningfully correlate how regional criteria air pollutant emissions above the Air District's significance thresholds correlate with basin wide health impacts.

Resulting Significance: Significant and Unavoidable

Impact AQ-3: Construction emissions associated with future development projects could expose air quality-sensitive receptors to substantial toxic air contaminant concentrations and exceed the Bay Area Air District's (Air District) project-level and cumulative significance thresholds.

Mitigation Measure AQ-3: Prior to discretionary approval by the City, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or Overburdened Community, as measured from the property line of the project site to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the Air District. If the HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM2.5 exceeds the respective threshold, as established by the Air District (all areas of the City and Sphere of Influence), the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM2.5 to an acceptable level. T-BACTs may include but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions
- Electrifying warehousing docks
- Requiring use of newer equipment
- Requiring near-zero or zero-emission trucks for a portion of the vehicle fleet based on opening year.
- Truck Electric Vehicle (EV) Capable trailer spaces.
- Restricting off-site truck travel through the creation of truck routes.

T-BACTs identified in the HRA shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA (California Environmental Quality Act) review.

Finding: Due to the proposed project potentially contributing to cumulative health risks in the area that could affect sensitive populations, impacts would be significant and unavoidable.

Rationale for Finding: Future development could result in new sources of TAC emissions or particulate matter (PM2.5) near existing or planned sensitive receptors. Review of development projects by the Air District for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gas stations), in addition to goals, policies, and actions in the proposed 2045

General Plan Reset, would ensure that health risks are minimized. Individual development projects would be required to achieve the incremental risk thresholds established by the Air District, and TAC and PM2.5 project-level impacts would be less than significant. However, these projects could contribute to significant cumulative risk in the Bay Area that could affect sensitive populations and Overburdened Communities. As a result, the proposed project's contribution to cumulative health risk is considered significant and unavoidable.

Resulting Significance: Significant and Unavoidable

GREENHOUSE GAS EMISSIONS

Impact GHG-1: Implementation of the proposed project could exceed the greenhouse (GHG) emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under Senate Bill (SB) 32 or the carbon neutrality goal under Assembly Bill (AB) 1279.

Mitigation Measure GHG-1: The City of San Carlos shall prepare an update to its Climate Mitigation and Adaptation Plan (CMAP) to chart a trajectory to achieve the long-term GHG reduction goal set by AB 1279. The updated CMAP shall be completed within three years of certification of the General Plan EIR. The updated CMAP shall be updated every five years to ensure the City is monitoring the CMAP's progress toward achieving the City's GHG reduction target(s), and the City shall amend the CMAP if it is not achieving such targets. The CMAP update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CMAP update.

The CMAP update shall include the following:

- GHG inventories of existing and forecast year GHG levels.
- Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.
- Plan implementation guidance that includes, at minimum, the following components consistent with the CMAP update:
    - Administration and Staffing
    - Finance and Budgeting
    - Timelines for Measure Implementation
    - Community Outreach and Education
    - Monitoring, Reporting, and Adaptive Management
    - Tracking Tools

Finding: Even with the Mitigation Measure GHG-1, the proposed project would cause a significant and unavoidable effect identified in the EIR.

Rationale for Finding: Implementation of Mitigation Measure GHG-1 would ensure that the City prepares a CMAP update to chart a trajectory to achieve the long-term year 2045 GHG reduction goal and State's carbon neutrality goal set by AB 1279. However, given the growth in

population and employment within the EIR Study Area and the magnitude of GHG emissions reductions needed to achieve the GHG reduction target, it is unknown at this time whether targets contained in the future CMAP update will be achieved and, therefore, GHG emissions are considered significant and unavoidable.

Resulting Significance: Significant and Unavoidable

TRANSPORTATION

Impact TRAN-2: The proposed project could exceed the City's VMT significance criteria by generating VMT per service, per capita, and per employee that exceeds a threshold of 15 percent less than the regional average and by increasing total countywide VMT.

Mitigation Measure TRAN-2: The City of San Carlos shall amend its Transportation Demand Management program (San Carlos Municipal Code Chapter 18.25, Transportation Demand Management) to increase the required trip reduction to the extent feasible.

Finding: Even with the Mitigation Measure TRAN-2, the proposed project would cause a significant and unavoidable effect identified in the EIR.

Rationale for Finding: With the amendment of the City's TDM program to include a more stringent trip reduction requirement, the City would reduce vehicle miles traveled (VMT) from future development projects to the extent deemed feasible by the City. The City has already begun the process of updating its TDM program, as part of the Citywide Transportation Demand Management and Parking Reform Project. However, the City has not yet determined the precise amount by which the trip reduction requirement will be amended. Until such time that the TDM program is amended, this impact remains significant and unavoidable at the programmatic level, and it is unknown if the amended program would be able to achieve a VMT reduction sufficient to reduce this impact to a less-than-significant level. This finding does not preclude future projects from identifying less-than-significant VMT impacts, or from screening out of the City's detailed VMT analysis requirements.

Resulting Significance: Significant and Unavoidable

WILDFIRE

Impact WILD-2: Future development during the buildout horizon of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.

Mitigation Measure WILD-2: None available.

Finding: Due to the City having a responsibility to meet other, conflicting obligations, under different State and federal laws, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires, there are no feasible mitigation measures beyond the relevant laws and the policies and plans identified in the EIR. As a result, the proposed project would cause a significant and unavoidable impact.

Rationale for Finding: The implementation of the proposed project could increase population, buildings, and infrastructure in areas prone to wildfires. Although the goals, policies, and actions

outlined in the Environmental Safety and Public Services (ESPS) Element of the proposed 2045 General Plan Reset, along with mandatory State wildfire hazard reduction measures, reduce risks in these wildfire-prone areas, some impacts related to the potential increase in pollutant concentrations and the uncontrolled spread of wildfire would be reduced, but not to a less-than-significant level.

There are numerous preventative measures the City considers in wildfire-prone areas, from defensible space requirements to wildland urban interface building code requirements. The proposed 2045 General Plan Reset includes specific policies and actions that require both existing developments and new projects to establish and maintain fire-safe vegetation around structures and roadways, enforce fire-safe standards, and create fuel breaks. Additionally, new developments will be mandated to prepare Fire Protection Plans, ensuring comprehensive measures are in place to address wildfire hazards. These strategies represent the most effective wildfire hazard reduction measures available. However, to eliminate the risks associated with wildfires, it would be necessary to prohibit development in areas designated as very high fire hazard severity zones or in the wildland urban interface. Prohibiting new development in this portion of San Carlos is not feasible or practical because the City has a responsibility to meet other, conflicting obligations, under different State laws, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires. Therefore, this measure is considered and rejected, and there are no feasible mitigation measures beyond the policies and plans described above. Given the potential unknown impacts related to future development under the proposed project, impacts at the programmatic level are expected to remain significant and unavoidable. This conclusion does not rule out the possibility of finding less-than-significant impacts at the project-specific level.

Resulting Significance: Significant and Unavoidable

Impact WILD-5: Future development during the buildout horizon of the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas, Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface (WUI), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.

Mitigation Measure WILD-5: None available.

Finding: Due to the City having a responsibility to meet other, conflicting obligations, under different State laws, including increasing the number and type of housing available and allowing reconstruction of homes burned by wildfires, there are no feasible mitigation measures beyond the policies and plans identified in the EIR and the proposed project would cause a significant and unavoidable impact.

Rationale for Finding: Even with implementation of the goals, policies, and actions in the proposed 2045 General Plan Reset, the only way to fully avoid the cumulative wildfire impact is to prohibit development in the Very High FHSZs and wildland urban interface throughout the region. As a full prohibition of development in these areas is not feasible in the region, as described for Impact WILD-2, this impact is significant and unavoidable.

Resulting Significance: Significant and Unavoidable

Findings Regarding Project Alternatives

The CEQA Guidelines require that an EIR describe a reasonable range of alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant environmental effects of the project, and then evaluate the comparative merits of such alternatives (CEQA Guidelines Section 15126(a)). For the purpose of these findings, the term "EIR" refers to the Draft EIR and Final EIR documents collectively, unless otherwise specified.

SIGNIFICANT IMPACTS

Based on the analyses in Chapter 4 of the Draft EIR, the City has determined that the proposed project's potentially significant environmental effects may not be avoidable or reduced to less-than-significant levels through implementation of the mitigation measures described in the EIR.

ALTERNATIVES CONSIDERED

Through the environmental review process, the City identified two (2) potential project alternatives for consideration. The following alternatives are evaluated in Chapter 5, *Alternatives*, of the Draft EIR:

- **No Project Alternative.** Under the No Project Alternative, future development in San Carlos would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing General Plan 2030. The No Project Alternative assumes development of projects already in the development pipeline only and no additional non-residential growth or adoption of the Downtown Specific Plan (DTSP) or the Northeast Area Specific Plan (NEASP). Overall residential growth would be the same as under the proposed project but, because the NEASP would not be adopted, new housing would not be introduced in the Northeast area.
- **Reduced Non-Residential Buildout Alternative.** The Reduced Non-Residential Buildout Alternative includes full buildout of development projects already in the pipeline plus 50 percent of the remaining non-residential buildout included in the proposed project. The Reduced Non-Residential Buildout Alternative would involve the same proposed General Plan goals, policies, and actions that would occur under the proposed project. The alternatives analysis assumes that all applicable mitigation measures and General Plan policy amendments recommended for the proposed project would apply to the Reduced Non-Residential Buildout Alternative.

The primary purpose of an EIR's alternative analysis is to identify and evaluate possible alternatives to the proposed project that can avoid or substantially lessen the project's significant environmental effects while still achieving the basic objectives of the project. The City has developed the following project objectives:

- Allow for a mix of development to support the City's economic resiliency and to sustain a robust local economy.
- Preserve, protect, and promote industrial, commercial, and office uses to maintain a thriving ecosystem of local businesses and to provide for local jobs.

- Provide a mix of housing that meets the needs of a diverse community, as outlined in the 2023-2031 Housing Element and for future Housing Element cycles.
- Make minor updates to the 2030 General Plan to reference recent City initiatives, plans or new State/federal regulations.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative is the alternative that would be expected to generate fewer significant impacts. In addition to the discussion and comparison of impacts of the project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be identified. Identification of the environmentally superior alternative is an informational procedure and the alternative identified may not be the alternative that best meets the goals or needs of the City of San Carlos.

The Reduced Non-Residential Buildout Alternative would result in lessened environmental impacts related to air quality, cultural resources, geology and soils, GHG emissions, noise, and tribal cultural resources, and would not result in greater impacts for any resource categories.

FINDINGS REGARDING ALTERNATIVES

As further set forth below, the City has considered the possible alternatives identified and analyzed in the EIR and has elected to approve the proposed project described in Chapter 3, *Project Description*, of the Draft EIR. None of the alternatives would meet all the project objectives and the City finds that the alternatives would be infeasible for specific economic, social, or other considerations pursuant to CEQA Sections 21002 and 21081(a)(3), and CEQA Guidelines Section 15091(a)(3). Based on the evaluation and analysis of project alternatives set forth in Chapter 5 of the Draft EIR, and on the entire record of proceedings for the proposed project, the City hereby makes the following findings:

- **Findings Relating to the No Project Alternative.** The City considered a No Project Alternative and declines to adopt it because it is inconsistent with the project objectives. Under the No Project Alternative, the proposed project would not be implemented. This alternative would not allow for a mix of development to support the City's economic resiliency and to sustain a robust local economy; preserve, protect, and promote industrial, commercial, and office uses to maintain a thriving ecosystem of local businesses and to provide for local jobs; provide a mix of housing that meets the needs of a diverse community, as outlined in the 2023-2031 Housing Element and for future Housing Element cycles; or make minor updates to the 2030 General Plan to reference recent City initiatives, plans or new State regulations. For these reasons, this alternative is infeasible as it fails to meet half of the project's objectives, as supported by the administrative record for the proposed project.
- **Findings Relating to the Reduced Non-Residential Buildout Alternative.** The City considered a Reduced Non-Residential Buildout Alternative. As most of the project components would remain the same under the Reduced Non-Residential Buildout Alternative, this alternative would fulfill almost all of the project objectives and would result in an overall lower level of impact compared to the proposed project for the environmental topic areas of air quality, cultural resources, geology and soils, GHG emissions, noise, and tribal cultural resources. However, the Reduced Non-Residential Buildout Alternative would

not meet the project objectives of allowing for a mix of development to support the City's economic resiliency and to sustain a robust local economy, and of preserving, protecting, and promoting industrial, commercial, and office uses to maintain a thriving ecosystem of local businesses and to provide for local jobs. For these reasons, this alternative is rejected as it fails to meet key project's objectives, as supported by the administrative record for the proposed project.

EXHIBIT D: MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the 2045 General Plan Reset, herein referred to as the "proposed project" or "project." The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the proposed project. The MMRP includes the following information:

- The full text of the mitigation measures;
- The party responsible for implementing the mitigation measures;
- The timing for implementation of the mitigation measures;
- The agency responsible for monitoring the implementation; and
- The monitoring action and frequency.

The City of San Carlos must adopt this MMRP, or an equally effective program, if it approves the proposed project with the mitigation measures that were adopted or made conditions of project approval.

MITIGATION MONITORING AND REPORTING PROGRAM

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
AIR QUALITY					
AQ-2.1: Prior to discretionary approval by the City for development projects subject to CEQA (California Environmental Quality Act) review (i.e., discretionary, nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with current Air District methodology for assessing air quality impacts identified in the Air District's *CEQA Air Quality Guidelines*. If construction-related criteria air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require feasible mitigation measures to reduce air quality emissions. Measures shall require implementation of current Air District Best Management Practices for construction-related fugitive dust emissions. At the time of preparation of this EIR, such practices include: ▪ Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) at least twice daily or as often as needed to control dust emissions. ▪ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ▪ All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. ▪ All vehicle speeds on unpaved roads shall be limited to 15 mph. ▪ All roadways, driveways, sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seedling or soil binders are used.	Project applicants for development projects subject to CEQA	Prior to discretionary approval by the City	City of San Carlos Building Division, Planning Division	Review and approve technical assessment and mitigation measures, if required; Verify mitigation measures, if required, are incorporated into construction documents	Once for review; Once for verification

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
▪ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. ▪ All trucks and equipment, including their tires, shall be washed off prior to leaving the site. ▪ Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compact layer of wood chips, mulch, or gravel. ▪ Prior to the commencement of construction activities, individual project proponents shall 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. The Air District phone number shall also be visible to ensure compliance with applicable regulations. Measures shall be incorporated into appropriate construction documents (e.g., construction management plans) and shall be verified by the City.					
AQ-2.2: Prior to discretionary approval by the City for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operational air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with Air District methodology in assessing air quality impacts identified in the Air District's current CEQA Air Quality Guidelines at the time that the project is considered. If operation-related air pollutants are determined to have the potential to exceed the District-adopted thresholds of significance, the City shall require the project applicant(s) to incorporate mitigation measures to reduce air pollutant	Project applicants for development projects subject to CEQA	Prior to discretionary approval by the City	City of San Carlos Building Division, Planning Division	Review and approve technical assessment and mitigation measures	Once

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
emissions to comply with applicable significance threshold standards during operational activities. The identified measures shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA review. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following: ▪ Implementing commute trip reduction programs. ▪ Unbundling residential parking costs from property costs. ▪ Expanding bikeway networks. ▪ Expanding transit network coverage or hours. ▪ Using cleaner-fueled vehicles. ▪ Exceeding the current Title 24 Building Envelope Energy Efficiency Standards. ▪ Establishing on-site renewable energy generation systems. ▪ Requiring all-electric buildings. ▪ Replacing gas-powered landscaping equipment with zero-emission alternatives. ▪ Implementing organics diversion programs. ▪ Expanding urban tree planting.					
AQ-3: Prior to discretionary approval by the City, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or Overburdened Community, as measured from the property line of the project site to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City for review and approval. The HRA shall be	Project applicants for projects subject to discretionary approval by the City	Prior to discretionary approval	City of San Carlos Planning Division, Building Division	Review health risk assessment and control technologies, if required; Verify incorporation into conditions or approval or mitigation	Once for review; Once for verification

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the Air District. If the HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM2.5 exceeds the respective threshold, as established by the Air District (all areas of the City and Sphere of Influence), the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM2.5 to an acceptable level. T-BACTs may include but are not limited to: ▪ Restricting idling on-site beyond Air Toxic Control Measures idling restrictions ▪ Electrifying warehousing docks ▪ Requiring use of newer equipment ▪ Requiring near-zero or zero-emission trucks for a portion of the vehicle fleet based on opening year. ▪ Truck Electric Vehicle (EV) Capable trailer spaces. ▪ Restricting off-site truck travel through the creation of truck routes. T-BACTs identified in the HRA shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA (California Environmental Quality Act) review.				monitoring and reporting plan	

MITIGATION MONITORING AND REPORTING PROGRAM

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
GREENHOUSE GAS EMISSIONS					

GHG-1: The City of San Carlos shall prepare an update to its Climate Mitigation and Adaptation Plan (CMAP) to chart a trajectory to achieve the long-term GHG reduction goal set by AB 1279. The updated CMAP shall be completed within three years of certification of the General Plan EIR. The updated CMAP shall be updated every five years to ensure the City is monitoring the CMAP's progress toward achieving the City's GHG reduction target(s), and the City shall amend the CMAP if it is not achieving such targets. The CMAP update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CMAP update.
 	
The CMAP update shall include the following:
▪ GHG inventories of existing and forecast year GHG levels.
▪ Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.
▪ Plan implementation guidance that includes, at minimum, the following components consistent with the CMAP update:
  ▪ Administration and Staffing
  ▪ Finance and Budgeting
  ▪ Timelines for Measure Implementation
  ▪ Community Outreach and Education
  ▪ Monitoring, Reporting, and Adaptive Management
  ▪ Tracking Tools
	City of San Carlos	Within three years of certification of the 2045 General Plan Reset EIR; Prepare subsequent updates every five years	City of San Carlos Community Development Department	Confirm Climate Mitigation and Adaptation Plan (CMAP) updates	Once after three years for initial update; Once every five years for subsequent updates

TABLE 1 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
TRANSPORTATION					
TRAN-2: The City of San Carlos shall amend its Transportation Demand Management program (San Carlos Municipal Code Chapter 18.25, *Transportation Demand Management*) to increase the required trip reduction to the extent feasible.	City of San Carlos	Within one year following certification of the 2045 General Plan Reset EIR	City of San Carlos Planning Division	Confirm amendment	Once