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February 25, 2025

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Subject: 2045 General Plan Reset, Draft Program Environmental Impact Report,
 SCH No. 2024060037, City of San Carlos, San Mateo County

Dear Akanksha Chopra:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) from the City of San Carlos (City) for the 2045 General Plan Reset (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted comments in response to the Notice of Preparation of the DPEIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by

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State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

California Endangered Species Act and Native Plant Protection Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA or NPPA, either during construction or over the life of the Project. Under CESA, take is defined as “to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill.” Issuance of an ITP is subject to CEQA documentation. If the Project will impact CESA or NPPA listed species, early consultation with CDFW is encouraged, as significant modification to the Project and mitigation measures may be required to obtain an ITP. Issuance of an ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. Fully protected species may not be taken or possessed at any time (Fish and Game Code, §§ 3511, 4700, 5050, and 5515.)

CEQA requires a Mandatory Finding of Significance if a Project is likely to substantially impact threatened or endangered species (Pub. Resources Code, §§ 21001(c), 21083, and CEQA Guidelines §§ 15380, 15064, 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency’s FOC does not eliminate the Project proponent’s obligation to comply with Fish and Game Code, § 2080 et. seq.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains are generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Any impacts to the mainstems, tributaries and floodplains or associated riparian habitat would likely require an LSA Notification. CDFW, as a responsible agency under CEQA, will consider the DPEIR for the Project. CDFW may not execute a final LSA Agreement until it has complied with CEQA as the responsible agency.

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Raptors and Other Nesting Birds

CDFW has authority over actions that may result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include §§ 3503 (regarding unlawful take, possession or needless destruction of the nests or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act (MBTA).

Fully Protected Species

Fully protected species, such as San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), California Ridgway's rail (*Rallus obsoletus obsoletus*, formerly California clapper rail) or California Black rail (*Laterallus jamaicensis coturniculus*) may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research;
- Efforts to recover a fully protected, endangered, or threatened species, live capture and relocation of a bird species for the protection of livestock; or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish & G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.

PROJECT DESCRIPTION SUMMARY

Proponent: City of San Carlos

Objective: The objective of the Project is to plan for the growth of San Carlos over a 20-year time horizon and to: 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 outlines in the 2023-2031 Housing Element and for future Housing Element cycles; and make minor updates to the 2030 General Plan to reference recent City initiatives, plans, or new State regulations.

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Location: City of San Carlos, San Mateo County, CA 94070.

Timeframe: 2025-2045

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Project Description and Related Impact Shortcoming

COMMENT 1: Program EIR Subsequent Project Review

The Project EIR has been prepared as a draft Program EIR pursuant to CEQA Guidelines Section 15168 but the Program EIR does not include a checklist for subsequent project review. While Program EIRs have a necessarily broad scope, CDFW recommends providing as much information related to anticipated future activities as possible. CDFW recognizes that, pursuant to CEQA Guidelines section 15152, subdivision (c), if a Lead Agency is using the tiering process in connection with an EIR or large-scale planning approval, the development of detailed, site-specific information may not be feasible and can be deferred, in many instances, until such time as the Lead Agency prepares a future environmental document. This future environmental document would cover a project of a more limited geographical scale and is appropriate if the deferred information does not prevent adequate identification of significant effects of the planning approval at hand. The CEQA Guidelines section 15168, subdivision (c)(4) states, "Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR." Based on CEQA Guidelines section 15183.3 and associated Appendix N Checklist, and consistent with other program EIRs, CDFW recommends creating a procedure or checklist for evaluating subsequent Project impacts on biological resources to determine if they are within the scope of the Program EIR or if an additional environmental document is warranted. This checklist should be included as an attachment to the EIR. Future analysis should include all special-status species and sensitive habitat including but not limited to species considered rare, threatened, or endangered species pursuant to CEQA Guidelines, section 15380.

When used appropriately, the checklist should be accompanied by enough relevant information and reasonable inferences to support a "within the scope" of the EIR conclusion. For subsequent Project activities that may affect sensitive biological

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resources, a site-specific analysis should be prepared by a Qualified Biologist to provide the necessary supporting information. In addition, the checklist should cite the specific portions of the EIR, including page and section references, containing the analysis of the subsequent Project activities' significant effects and indicate whether it incorporates all applicable mitigation measures from the EIR.

II. Environmental Setting and Mitigation Measure Related Impact Shortcomings

MANDATORY FINDING OF SIGNIFICANCE. Does the Project have potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species?

And,

Would the Project 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 CDFW or U.S. Fish and Wildlife Service (USFWS)?

COMMENT 2: Nesting Birds, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: Nesting birds, including American Peregrine falcon (*Falco peregrinus anatum*) and Alameda song sparrow (*Melospiza melodia pusillula*), have the potential to nest on the ground, in trees, on structures, or in vegetation within and in the vicinity of the EIR Study Area. The DPEIR states that "development in locations abutting or in the vicinity of open space lands or water resources, where special status species are more likely to occur, could potentially cause a significant impact to, or cause the inadvertent loss, of bird nests in active use." Though not mentioned in the DIER, the City of San Carlos General Plan Environmental Management Element contains an action item (Action EM-1.5) requiring "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." However, the DPEIR lacks specific avoidance, minimization and mitigation measures to protect nesting birds sufficient to reduce potential impacts to less-than-significant levels.

Specific impact, why the impact would occur, and evidence the impact would be significant: The federal MBTA and California Fish and Game Code protect migratory and nesting birds, including species with potential to occur in the Project area (e.g., American falcon and Alameda song sparrow). The nesting seasons for passerines, owls, and raptors range from February 15- August 30, January 15- September 15, and February 15- September 15, respectively.

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Recommendation 2: CDFW recommends the PEIR include avoidance and minimization measures to protect nesting birds by incorporating the mitigation measure below to reduce potential impacts to less-than-significant levels:

Recommended Nesting Bird Mitigation Measure: If Project grading or construction is scheduled to take place between January 15 – September 15, a preconstruction survey of the Project vicinity for nesting birds shall be conducted by a qualified biologist experienced with the nesting behavior of bird species of the region. The survey shall determine if active nests are present within the planned area of disturbance or within 250 feet for passerines, 500 feet for accipiters and 1,000 feet for buteos. The survey shall be performed no more than seven days prior to the commencement of construction activities, and a second focused survey shall be conducted within 48 hours prior to construction activities that would occur during the nesting/breeding season. If ground disturbance activities are delayed following a survey, then an additional preconstruction survey shall be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities. If a lapse of Project-related activities of seven days or longer occurs, another focused survey will be conducted before Project activities can be reinitiated.

If an active bird nest is found within the survey radii, species-specific measures shall be prepared by a qualified biologist and implemented to prevent abandonment of the active nest. A protective buffer distance shall be established by a qualified biologist based on the site conditions such as whether the nest is in a line of sight of the construction and the sensitivity of the birds nesting. Typical protective buffers are as follows: 1) 250 feet for passerines, 2) 500 feet for accipiters, and 3) 1,000 feet for buteos. No Project personnel or equipment shall be allowed to enter the protective buffer until the qualified biologist determines that the young have fully fledged and will no longer be adversely affected by the Project.

The qualified biologist shall observe any identified active nests prior to the start of any construction-related activities to establish a behavioral baseline of the adults and any nestlings, and the nest site(s) shall be monitored by the biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. The perimeter of the nest setback zone shall be fenced or adequately demarcated with stakes and flagging at 20-foot intervals, and construction personnel and activities restricted from the area. A survey report by the qualified biologist verifying that no active nests are present, or that the young have fledged, shall be submitted prior to initiation of grading in the nest-setback zone. The qualified biologist shall serve as a biological monitor during those periods when construction activities occur near active nest areas to

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ensure that no inadvertent impacts on these nests occur. All buffers shall be shown on all sets of construction drawings.

COMMENT 3: Bats, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: The DPEIR states that special-status bats such as the pallid bat (*Antrozous pallidus*) have the potential to occur within the EIR Study Area and that there exists potential for species loss or disruption “due to conversion of areas of natural habitat, removal of trees and other vegetation, increases in light and noise, and other modifications and disturbance,” a potentially significant impact under CEQA. The DPEIR does not include measures to avoid, minimize, and/or mitigate potentially significant impacts to roosting bats.

Specific impact, why the impact would occur, and evidence the impact would be significant: Bats play an important role in Bay Area ecosystems, through pest control, pollination and seed dispersal. Recent studies estimate that bat consumption of insect pests results in more than \$3 billion in agricultural production savings per year in the U.S. (USFWS 2025). Bats are known to roost under bridges, in caves and mines, on buildings, in cliff crevices, in tree foliage, bark, and hollows, and in riprap, with habitat use varying temporally and seasonally. Suitability of bat roosting habitat is dependent on temperature, protection from predators and inclement weather, and proximity to foraging sites. Habitat reduction and disruption of hibernation and maternity roosts due to human development and activity have contributed to steep population declines in California and across the globe. Many bat species are long lived, with most females birthing only one to two young per year. Due to low reproductive rates and sensitivity of breeding females to disruption, maternity colonies affected by human activities that temporarily reduce fecundity or mortality may require multiple years to recover following disturbance events (California Department of Transportation [Caltrans] 2019).

Recommendation 3: CDFW recommends including avoidance and minimization measures to protect bats that have the potential to occur within the PEIR Study Area, and recommends incorporating the following mitigation measure:

Recommended Bat Mitigation Measure: At any Project site where trees or abandoned buildings would be removed or heavily modified, prior to Project activities that would remove trees or modify buildings, a qualified biologist shall conduct a habitat assessment for bats. The habitat assessment shall be conducted a minimum of 30 to 90 days prior to the beginning of Project activities.

For tree removal, the habitat assessment shall include a visual inspection of potential roosting features (e.g., cavities, crevices in wood and bark, exfoliating bark for colonial species, suitable canopy for foliage roosting species). If suitable

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habitat is found, it shall be flagged or otherwise clearly marked. Trees shall be removed only if:

- a) Presence of bats is presumed or documented during surveys in trees with suitable habitat, and removal using the two-step removal process detailed below occurs only during seasonal periods of bat activity, from approximately March 1 through April 15, and September 1 through October 15, or;
- b) After a qualified biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats.

Two-step tree removal shall be conducted over two consecutive days. On the first day (in the afternoon), under the direct supervision and instruction by a qualified biologist with experience conducting two-step tree removal, limbs and branches shall be removed by a tree cutter using chainsaws only. Limbs with cavities, crevices, or deep bark fissures shall be avoided. On the second day the remainder of the tree shall be removed.

For modification of buildings, a qualified biologist shall conduct a survey for roosting bats. If roosting bats are detected, a bat avoidance and exclusion plan shall be implemented. The plan shall recognize that both maternity and winter roosting seasons are vulnerable times for bats and require exclusion outside of these times, generally between March 1 and April 15, or September 1 and October 15 when temperatures are sufficiently warm. Work operations shall cease if bats are found roosting within the Project area, and CDFW shall be consulted.

For loss of suitable bat habitat trees or impacts to buildings or structures occupied by bats subject to bat avoidance measures, the Project shall provide habitat mitigation in the form of:

- 1) Native tree planting at an appropriate ratio to offset canopy and temporal habitat loss and tree planting maintenance for a minimum of five years and until success criteria are met, or;
- 2) Establishing suitable bat habitat structures.

A qualified biologist shall prepare and submit a bat habitat mitigation plan to CDFW and obtain CDFW's approval of the plan prior to the start of Project activities, and shall implement the plan, unless otherwise approved in writing by CDFW.

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COMMENT 4: San Francisco Garter Snake, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: San Francisco garter snake (SFGS) has the potential to occur within the Project Study Area, but the DPEIR does not adequately discuss or evaluate to what extent Project development could cause direct and/or indirect impacts to SFGS individuals or habitat. Additional impact assessment information is needed for CDFW to confirm Project protective measures will avoid direct and/or indirect impacts to SFGS and their habitat Delineations of SFGS habitat components by a qualified expert are necessary to determine areas where these species may occur within the Project area.

Specific impact, why impact would occur, and evidence impact would be significant: SFGS is a State Fully Protected species and is listed as endangered under CESA. SFGS require a variety of habitats, including aquatic breeding habitat and upland dispersal habitat. SFGS have been documented to disperse up to half a mile from aquatic breeding sites. Far-dispersing individuals provide genetic diversity to distant breeding sites and thus aid the survival of small, disparate populations. Construction and maintenance activities in suitable habitat could result in direct and indirect take to SFGS. Project development could injure or kill SFGS if they occur on-site, potentially resulting in a substantial reduction of their populations. Indirect take may occur due to upland habitat loss and degraded site suitability for SFGS to complete all stages of their life cycle.

SFGS are endemic snakes with a highly limited range in the San Francisco Peninsula. They utilize a variety of habitats including upland sites for basking, rodent burrows for shelter and low-lying marsh for feeding and reproduction (USFWS 1985). In coastal areas, SFGS may hibernate during the winter in small mammal burrows (USFWS, 2007). SFGS are threatened by loss of habitat from agricultural, commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, California red-legged frog (*Rana draytonii*).

SFGS are CESA listed as endangered species and therefore are a threatened or endangered species pursuant to CEQA Guidelines section 15380. Therefore, if SFGS are injured or killed, or their habitat is removed as a result of Project development, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, which is considered a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommendation 4: CDFW recommends the PEIR include additional information to facilitate meaningful review and understanding of Project impacts on SFGS habitat and populations. Protective buffers should be identified in the PEIR and include migration corridors, breeding and non-breeding habitat, as well as adjacent

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land necessary to protect these areas. Establishing appropriately sized construction buffers and protected areas that consider both short- and long-range SFGS dispersal is essential to protect SFGS individuals, populations, and habitat. Specifically, the PEIR should describe the extent of temporary and permanent impacts that would occur to SFGS breeding and/or upland habitat. Additionally, CDFW recommends the PEIR incorporate the following mitigation measure:

Recommended San Francisco Garter Snake Mitigation Measure: The Project and all tiered projects shall be designed to avoid impacts to SFGS individuals and habitat. Protocol-level surveys for SFGS individuals and habitat shall be performed by an agency-approved qualified biologist prior to construction in or adjacent to potentially suitable SFGS aquatic and/or upland habitat, including wetlands, riparian areas, grasslands near ponds/wetlands, or other sensitive habitat, following survey protocols approved by USFWS and CDFW. An agency-approved qualified biologist, in consultation with USFWS and CDFW, shall determine appropriate, site-specific buffers to protect SFGS breeding and upland habitat prior to conducting grading or other construction activities.

COMMENT 5: Crotch's Bumble Bee, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: The DPEIR does not identify potential impacts to Crotch's bumble bee (*Bombus crotchii*, CBB). The current range of CBB encompasses the proposed EIR Study Area, and proposed Project activities could impact bumble bees if they are present on-site. The DPEIR does not include avoidance, minimization or mitigation measures to protect potential CBB that may occur within the Project area.

Specific impacts, why they may occur and be potentially significant: CBB is a candidate species under CESA and therefore should be considered a threatened, endangered, or rare species under CEQA pursuant to CEQA Guidelines section 15380. Many bumble bee species, including CBB, once common in the western United States, have undergone a dramatic decline in both distribution and abundance and are now extirpated from much of their historic ranges. Many bumble bees are threatened with extinction due primarily to reductions in habitat from urbanization, intensive agriculture, and invasive species introductions.

Bumble bees, including CBB, are found in a wide variety of natural, agricultural, urban and rural habitats, and require suitable nesting and overwintering sites as well as availability of nectar and pollen from floral resources (Hatfield et al. 2018). Potential nest habitat utilized from late February to late October includes underground abandoned small mammal burrows, perennial bunch grasses and/or thatched annual grasses, brush piles, old bird nests, dead trees, or hollow logs. Overwintering sites are utilized from November through early February by mated queens in self-excavated hibernacula, and could be present in soft, disturbed soil,

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sand, well-drained or loose soils, under leaf litter or other debris with ground cover requisites such as barren areas, tree litter, and bare patches within short grass in areas lacking dense vegetation. Any near-surface or subsurface ground disturbance within Project sites could result in the direct take of bumble bee colonies or overwintering queens. Bumble bees are generalist foragers, and do not depend on any one flower type, often visiting native and non-native flowering plants alike to collect the pollen and nectar resources needed to sustain their colonies and provision nest cells. Vegetation removal, including removal of any flowering plants or trees within the EIR Study Area, could impact bumble bee habitat.

If CBB are injured or killed, or their habitat is removed as a result of Project development, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommendation 5: CDFW recommends the PEIR provide an assessment of the potential for the Project to impact CBB, and to incorporate the following mitigation measure to avoid, minimize, and mitigate potential impacts on CBB.

Recommended Crotch's Bumble Bee Mitigation Measure: CBB habitat assessments shall be performed in Project sites that may provide suitable CBB habitat and that could be impacted by Project development. The habitat assessment shall be conducted by a qualified biologist knowledgeable with the life history and ecological requirements of CBB, and include all areas of suitable overwintering, nesting, and foraging habitats within 100 feet of proposed work areas.

In areas with potential CBB habitat, pre-construction surveys for CBB individuals shall be conducted by a qualified biologist between March to August. Surveys shall include a minimum of three survey efforts, over a three-day period within a temperature range of 15C and 30C. If the qualified biologist suspects CBB detection or occupancy, CDFW shall be consulted immediately. CBB survey results shall be considered valid for one year at a given site, but additional surveys shall be performed prior to ground-disturbing activities at the discretion of the qualified biologist in consultation with CDFW. If surveys document the presence of CBB within Project sites, the City shall consult with CDFW prior to construction to determine if a CESA ITP authorization is required.

Further, if CBB are detected during surveys, the qualified biologist shall identify the location of all nests in or adjacent to Project sites. If nests are identified, a minimum 45-foot no-disturbance buffer zones shall be established around nests.

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The qualified biologist shall expand buffer zones as necessary to prevent disturbance and avoid take.

Bumble bee floral resources shall be mitigated at a 3:1 ratio for any permanent impacts to CBB habitat. Floral resources shall be replaced as close to their original location as is feasible. If active CBB nests have been identified and floral resources cannot be replaced within 600 feet of their original location, floral resources shall be planted in the most centrally available location relative to identified nests. This location shall be no more than 4,900 feet (1.5-kilometers) from any identified nest. Replaced floral resources may be split into multiple patches to meet distance requirements for multiple nests.

COMMENT 6: California Ridgway's Rail and California Black Rail, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: The DPEIR depicts the Study Area as occurring adjacent to and upstream of northern coastal salt marsh habitat that supports populations of California Ridgway's rail (CRRA) and California black rail (BLRA). The extent of the Study Area contains coastal creeks that drain into San Francisco Bay through a series of sloughs along Bair Island and may serve as wildlife movement corridors for species that are known to occur in the vicinity. Though the DPEIR identifies CRRA and BLRA as occurring in the vicinity of the EIR Study Area, it does not include analysis of the potential for Project development to impact these species, nor does it include measures to avoid, minimize or mitigate potentially significant impacts to CRRA or BLRA.

Specific impact, why impact would occur, and evidence impact would be significant: CRRA is a state and federally endangered and state fully protected species, and BLRA is a state threatened and state fully protected species. These species are at great conservation risk and are experiencing serious population declines or range retractions. Project activities could include impacts such as generation of noise, groundwork, and operation and movement of equipment and workers that would have the potential to disturb CRRA or BLRA foraging, roosting, and nesting. Direct mortality of CRRA or BLRA could occur through nest abandonment, loss of potential foraging habitat resulting in reduced reproductive success (loss or reduced health or vigor of eggs or young), inadvertent entrapment or entrapment, or impingement.

If CRRA or BLRA are injured or killed, or their habitat is removed as a result of Project development, the Project may result in a substantial reduction in the number or restriction in the range of a threatened species or endangered species, a Mandatory Finding of Significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

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Recommendation 6: CDFW recommends the PEIR provide an assessment of the potential for the Project to impact CRRA and BLRA, and incorporate the following mitigation measure to avoid, minimize, and mitigate potential impacts on these species.

Recommended CRRA and BLRA Mitigation Measure: A CDFW and USFWS-approved biologist shall conduct protocol-level surveys of CRRA and BLRA in all suitable habitats adjacent to the Project using the 2017 California Clapper Rail Survey Protocol to determine where CRRA or BLRA are present in each year of construction (Wood et al. 2017). CDFW staff are available to collaborate to incorporate calls of BLRA into the protocol to ensure that both species are sufficiently surveyed.

If CRRA or BLRA are found in suitable habitat near the Project site, appropriate buffers shall be incorporated to avoid and minimize impacts to CRRA and BLRA. A 700-foot no-work buffer shall be implemented between construction activities and any current-year breeding CRRA and BLRA detections if construction cannot be avoided during the rail breeding season (January 15- August 31 for CRRA, February 1- August 31 for BLRA). If establishing a 700-foot buffer around, breeding rail detections is not feasible, noise reducing modifications to equipment as well as portable acoustic barriers/blankets placed near noise sources may be appropriate to reduce auditory and visual impacts to breeding rails. Note that these noise reduction features may be appropriate regardless of time of year to minimize impacts to foraging rails as well. A qualified avian biologist shall advise and support buffer establishment in consultation with CDFW.

Fully protected species such as CRRA and BLRA may not be taken or possessed at any time. In the event a fully protected species is found within or adjacent to the Project site, an agency-approved qualified biologist shall implement an appropriate no-disturbance buffer and allow the individual to leave the Project site of its own volition. The qualified biologist shall also be on-site during all Project activities to ensure that fully protected species are not being disturbed by Project activities.

COMMENT 7: Special-Status Plants, Section 4.3.3, Page 4.3-18- 4.3-20

Issue: The DPEIR identifies the potential for special-status plant species to occur within the Study Area, including Franciscan onion (*Allium peninsulare* var. *franciscanum*), San Francisco collinsia (*Collinsia multicolor*), western leatherwood (*Dirca occidentalis*), Hillsborough chocolate lily (*Fritillaria biflora* var. *ineziana*), arcuate bushmallow (*Malacothamnus arcuatus* var. *arcuatus*), woodland woolleythreads (*Monolopia gracilens*), chaparral ragwort (*Senecio aphanactis*), alkali milk-vetch (*Astragalus tener* var. *tener*), San Joaquin spearscale (*Extriplex*

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joaquinana), and Contra Costa goldfields (*Lasthenia conjugens*), yet the DPEIR does not provide avoidance, minimization or mitigation measures to address potential temporary or permanent impacts to these species due to Project development.

Specific impact, why impact would occur, and evidence impact would be significant: Hillsborough chocolate lily and Contra Costa goldfields have a California Rare Plant Rank (CRPR) of 1B.1, and Franciscan onion, San Francisco collinsia, western leatherwood, arcuate bushmallow, woodland woolleythreads, alkali milk-vetch, and San Joaquin spearscale all have a CRPR of 1B.2. Plants with a CRPR of 1B are rare throughout their range, endemic to California, and are seriously or fairly threatened. Most plants that are ranked 1B have declined significantly over the last century. The additional threat rank of 0.1 and 0.2 indicates that over 80 percent, and 20 to 80 percent of their occurrences are threatened, respectively. Chaparral ragwort has a CRPR of 2B.2, and is threatened in California but more common elsewhere, with 20 to 80 percent of its occurrences threatened.

The conservation of special-status native plants is essential to maintaining biodiversity in the California Bay Area. Native plants are better adapted to the local environment, allowing them to grow more efficiently, require less maintenance, and provide habitat resources for other native species (Berthon et al. 2020). Industrial land development is a leading threat to endangered plant communities, causing resource depletion through direct habitat replacement and increased input of pollutants into the environment (Czech et al. 2000). Limited distribution and small population sizes of special-status plants can increase the difficulty in species detection, and robust survey efforts are imperative to determine whether plant species protected under the CESA and NPPA occur within the Project area. Robust and timely survey efforts are a necessary first step in avoiding take of listed species.

Consistent with CEQA Guidelines, section 15380, the status of special-status plants as CRPR 1 or 2 species qualifies them as endangered, rare, or threatened species under CEQA (see: <https://www.cnps.org/rare-plants/california-rare-plant-ranks>). If special-status plants occur within or adjacent to Project sites and would be directly or indirectly impacted by Project development, the Project may result in a substantial reduction in the number or restriction in the range of endangered, rare, or threatened species, a mandatory finding of significance pursuant to CEQA Guidelines section 15065, subdivision (a).

Recommendation 7: CDFW recommends the PEIR incorporate the following mitigation measure to avoid, minimize, and mitigate potential impacts on special-status plants.

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Recommended Special-Status Plant Mitigation Measure: Prior to construction at all Project sites not composed of hardscape or ornamental vegetation, a qualified biologist shall conduct botanical surveys during the appropriate blooming period and conditions for all special-status plants that have the potential to occur at or adjacent to each site where plants could be indirectly impacted. Surveys shall be conducted following CDFW's *Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (<https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants>) and include checking reference sites for target special-status plant species. Per this protocol, more than one year of surveys may be necessary if, for example, lack of rain inhibits growth of annual plants. If any special-status plant species are observed, the Project shall fully avoid direct and indirect impacts to all individuals and provide an avoidance plan to CDFW and obtain CDFW written approval of the plan. If full avoidance is not possible, Project activities may not commence until the Project has consulted with CDFW and obtained CDFW's written approval prior to the start of construction, which may include salvaging topsoil, transplanting and monitoring individuals, compensatory habitat mitigation, or other measures, based on the life history of the species and other relevant factors.

Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by CDFW or USFWS?

COMMENT 8: Riparian Delineation and Setbacks, Section 4.3.3, Page 4.3-21

Issue: The DPEIR describes existing conditions and includes a figure depicting vegetation and habitat types that are found within the extent of the Project Study Area. The DPEIR states that "although mostly urbanized, Pulgas, Brittan, Belmont and Cordilleras Creeks support areas of riparian habitat." Though the DPEIR references goals and policies within the 2045 General Plan Reset that would be protective of riparian areas, those areas of riparian habitat adjacent to Pulgas, Brittan, Belmont and Cordilleras Creeks are not depicted in the map of vegetation and habitat types in the DPEIR, nor is their extent described elsewhere. Additionally, the DPEIR states that future development would be required to comply with SCMC Section 18.144.040, which requires a 25-foot setback from the top of bank on each side of the creek to protect waterways.

Per CEQA Guidelines section 15125 (a), EIRs must include descriptions of the physical environmental conditions in the vicinity of the Project, and this environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant, the purpose of which is to give the public and decision makers the most accurate and

Akanksha Chopra, Associate Planner
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understandable picture practically possible of the Project's likely near-term and long-term impacts. The DPEIR does not provide sufficient information on the location, extent, or species composition of riparian areas adjacent to Cordilleras, Belmont, Brittan or Pulgas Creeks, in order to facilitate meaningful review of potential significant impacts of future development within the EIR Study Area. Further, in the absence of sufficient information to establish baseline physical conditions, it is unclear whether 25-foot riparian setbacks as prescribed in SCMC Section 18.144.040 would be sufficient to reduce potentially significant impacts of Project development on riparian habitat to less-than-significant levels. Lastly, Streambank armoring (e.g., with riprap and other hardscape materials) has the potential to result in significant impacts to stream resources and is commonly needed and reasonably foreseeable where riparian buffer distances are not sufficiently wide.

Specific impact, why impact would occur, and evidence impact would be significant: Riparian vegetation, and associated floodplains, provide many essential benefits to stream and aquatic species habitat (Moyle 2002, CDFW 2007). As stated in the DPEIR, "riparian habitat is a distinct plant community found along the margins of creeks and rivers," and "has a very high value to wildlife and generally exhibits a rich and diverse animal community." Development adjacent to the riparian zone can result in fragmentation of riparian habitat and decreases in native species abundance and biodiversity (Davies et al. 2001, Hansen et al. 2005, CDFW 2007). Riparian buffers help keep pollutants from entering adjacent waters, benefiting species who rely on those waters for habitat and drinking water. Narrow riparian buffers are considerably less effective in minimizing the effects of adjacent development than wider buffers (Castelle et al. 1992, Brosofske et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).

Riparian habitats also contribute to bank stability and provide flood protection. Development, including increases in impervious surfaces and installation of stormwater systems and storm drain outfalls, can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows (Hollis 1975, Konrad and Booth 2005). Riparian habitat and adjacent wetlands and floodplains are critical to lessening these impacts because they store and meter floodwaters, recharge groundwater aquifers, trap sediment, filter pollution, help minimize erosion, lessen peak flow velocities, and protect against storm surges. In doing so, they protect adjacent upland, down-stream, and coastal properties from loss and damage during flooding and help maintain surface and groundwater during summer months.

One goal of the 2045 General Plan Reset Environmental Management Element is to "promote healthy streams and riparian corridors." Policy LU-1.9 of the 2045 General Plan Reset is to "retain the channels, floodplains, riparian corridors (including suitable setbacks from the top of bank) and closely associated upland areas of

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Cordilleras, Brittain and Pulgas Creeks and their tributaries as significant open space areas” to “function as appropriate open space areas, greenbelt and to support a riparian habitat.”

Recommendation 8: CDFW recommends the PEIR include sufficient information to facilitate meaningful review of potentially significant impacts of Project development within riparian habitat. Specifically, CDFW recommends conducting habitat assessments to determine the location, extent, and vegetation composition of riparian areas in the EIR Study Area and include this information in detailed map depictions in the PEIR. CDFW also recommends the PEIR include supporting technical analysis to demonstrate the proposed 25-foot riparian buffer distance is protective of stream resources. In addition to establishing a minimum riparian buffer such as the proposed 25-foot distance, the following site-specific mitigation measure is recommended for inclusion in the PEIR to protect riparian areas:

Recommended Riparian Setback Mitigation Measure: Prior to project development in the vicinity of streams, wetlands, or other aquatic areas, an agency-approved qualified biologist shall conduct habitat surveys to identify riparian boundaries and determine the size of **site-specific buffers** necessary to protect riparian areas. Consideration for appropriate riparian buffer widths shall depend on site-specific characteristics such as the area and type of habitat to be buffered, the presence of habitat for sensitive species and their potential habitat use, site topography, slope, slope stability, and soils present at a particular site.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final.

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(Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Shannon Husband, Environmental Scientist, at (707) 337-1364 or Shannon.Husband@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

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California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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February 19, 2025

SCH #: 2024060037
GTS #: 33077
GTS ID: 04-SM-2024-00653
Co/Rt/Pm: SM/VAR/VAR

Akanksha Chopra, Associate Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070

Re: 2045 General Plan Reset — Draft Environmental Impact Report (DEIR)

Dear Akanksha Chopra:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 2045 General Plan Reset. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the January 2025 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project is an update to the City of San Carlos's 2030 General Plan to amend the buildout capacity. Citywide development projections for growth through 2045 include estimates of up to 8,300 new housing units, 15,620 new residents, 8,927,300 new nonresidential square footage, and 26,530 new employees. Sections of U.S. Route 101 (U.S. 101) and State Route (SR) 82 are within the San Carlos City limits and are likely to be impacted by future developments under the General Plan.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City's adopted Transportation Significance Criteria. Under these criteria any development that produces 15 percent less than the regional average VMT per service population, per capita, and per employee is considered less than significant.

Per the DEIR, the proposed project VMT impacts were determined to be significant and unavoidable. Caltrans acknowledges that the DEIR has identified Mitigation Measure TRAN-2 to help mitigate potential VMT impacts from future developments by amending the City's Transportation Demand Management (TDM) program to increase the required trip reduction to the extent feasible. The City is encouraged to review the 2023 Caltrans Transportation Demand Management Toolbox ([link](#)), which may contain additional TDM requirements and incentives not already discussed in the City's TDM program and General Plan.

Please additionally note that the City and County Association of Governments of San Mateo County (C/CAG) recently published its Final Report for the VMT/Greenhouse Gas (GHG) Model Mitigation Program ([link](#)). The VMT/GHG Model Mitigation Program was awarded through Caltrans' Sustainable Transportation Planning Grant Program and intends to assist project sponsors and developers in identifying feasible options for mitigating VMT and GHG emission impacts of land use and VMT-inducing transportation projects in the County. The City is encouraged to collaborate with Caltrans and C/CAG to explore more citywide or regional VMT mitigation options where feasible.

Mitigation Strategies

Caltrans Smart Mobility Framework Guide defines a place type based on four physical elements: built form, land use, mobility options, and people. Based on the Smart Mobility Framework 2022, the proposed project area is identified as an urban community that typically consists of moderately dense urban design, that are mostly residential but with mixed-use centers. Housing is varied in density and type. Transit is available to connect neighborhoods to multiple destinations. Street networks are fine-grained with good connectivity for pedestrians and limited connectivity for bicyclists.

Please also consider the measures listed below, which are quantified by the California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies in reducing regional VMT:

- Integrate Affordable and Below Market Rate Housing
- Locate Developments in Area with High Destination Accessibility
- Improve Destination Accessibility in Underserved Areas
- Implement Transit-Supportive Roadway Treatments
- Dedicate Land for Bike Trails
- Construct or Improve Bike Boulevards
- Provide Secure Bike Parking, especially near transit
- Create Urban Non-motorized zones
- Provide Electric Vehicle Charging Infrastructure
- Implement Shared Vehicle Program (car/bike/E-bike/scooter)
- Limit Residential Parking Supply

- Implement Market Price Public Parking (On-Street)

Lead Agency

As the Lead Agency, the City is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Fair Share Contributions

We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Caltrans recommends the City encourage fair share contributions from future development projects to the following Plan Bay Area 2050 projects:

RTP ID	Title	Scope	Open Period	Funding* (millions)
21-T06-027	Corridor & Interchange Improvements US-101 San Mateo County	This program includes funding to implement interchange improvements at SR-92, 3rd Ave, Holly St, Peninsula Ave, Produce Ave, Sierra Point Pkwy, University Ave, Willow Rd, and Woodside Rd; and funding for a planning study to scope interchange improvements at Candlestick.	2021 – 2035	\$901
21-T10-078	BRT Modernization SamTrans El Camino Real	This program includes funding to implement BRT improvements to existing bus service along El Camino Real from Daly City BART to Palo Alto Caltrain Station. Improvements include frequency upgrades (15-minute peak headways), dedicated lanes (45% of route), transit priority infrastructure and transit signal priority.	2036 - 2050	\$352
21-T12-119	Express Bus Service Expansion SamTrans	This program includes funding to implement new express bus service along US-101 and I-280 (on express lanes where available) from Foster City, San Mateo and Burlingame to Downtown San Francisco; from San Mateo and Palo Alto to Western San Francisco; and from San Bruno to	2021 - 2035	\$478

		Sunnyvale. Improvements include park-and-ride facilities, ramp improvements and bus stop improvements (20-minute peak headways).		
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Multimodal Transportation Planning

Please review and include reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the STN in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' right-of-way (ROW) requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity,

and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Flowchart, Figure 1.2 in Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval may take 30 days to 6 months or more depending on the project scope, size, complexity, completeness, compliance with policies and quality of the permit package submitted. Projects requiring exceptions to design standards or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). When the applicant is ready to pursue a Caltrans encroachment permit, please contact D4Permits@dot.ca.gov to initiate the process.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



Llisel Ayon
Acting Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse



2045 General Plan Reset - SCH no. 2024060037

From Zachariasen, Judith@DOC <Judith.Zachariasen@conservation.ca.gov>

Date Fri 1/31/2025 2:49 PM

To Akanksha Chopra <achopra@cityofsancarlos.org>

Cc OLRA@DOC <OLRA@conservation.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>

External Sender - From: ("Zachariasen, Judith@DOC"
<Judith.Zachariasen@conservation.ca.gov>)

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Dear Akanksha Chopra,

The California Geological Survey (CGS) has received the Draft Environmental Impact Report (DEIR) for the City of San Carlos 2045 General Plan Reset. This email conveys recommendations from CGS concerning geologic issues related to the project area as addressed in the DEIR.

1. Liquefaction Hazards

The project area is located within an earthquake zone of required investigation (ZORI) for liquefaction mapped by CGS in accordance with the 1990 Seismic Hazards Mapping Act. The DEIR and supporting documents, in addressing this hazard, should mention the ZORI, include a map showing their extent in the project area, and explicitly address the regulatory implications of the zone for future development.

Additional information regarding liquefaction and ZORI is available at the links below:

<https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>

<https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>

2. Lateral Spreading Hazards

The DEIR states "No known fault traces are located within the EIR Study Area and would not result in lateral spreading as a result of fault rupture." CGS notes that lateral spreading is a secondary effect of earthquake shaking associated with liquefaction and is not, in general, directly related to surface fault rupture. Thus, the absence of mapped fault traces does not imply the absence of a lateral spreading hazard, especially in an area with a significant liquefaction hazard. Lateral spreading should be addressed independently of fault rupture.

If you have any additional comments or questions, please feel free to call or email.

Thank you,
Judy Zachariasen



Judith Zachariasen, PhD, PG, CEG

Senior Engineering Geologist

Fault Zoning Unit Supervisor

Seismic Hazards Program

California Geological Survey

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March 3, 2025

By E-Mail: achopra@cityofsancarlos.org

Akanksha Chopra, Associate Planner
Community Development Department
City of San Carlos
600 Elm Street
San Carlos, CA 94070

Re: 2045 General Plan Reset Draft EIR

Dear Ms. Chopra:

This office represents Sequoia Union High School District ("District"). I am following up on the correspondence this office sent on October 18, 2024, on the District's behalf, and providing additional comments and input regarding the school facilities impacts related to the City of San Carlos to Environmental Impact Report ("EIR") for the 2045 General Plan Reset ("General Plan").

The District's primary concern is to ensure that the General Plan does not create significant impacts on the student population it serves, their families, District staff and teachers, and the school facilities in which they are housed. The District wishes to emphasize that this General Plan has the potential to have a profound negative effect on the students of San Carlos. To that end, the District first wishes to briefly touch on some of the concerns that do not appear to have been adequately addressed in the EIR.

First, the EIR appears to maintain the position that under Government Code section 65995 and Senate Bill 50 ("SB 50"), payment of statutory developer fees constitutes full mitigation of the General Plan's impact on the District. In our letter dated October 18, 2024, we provide a thorough explanation as to why the District disagrees with that overall position. Bottom line, statutory developer fees do not fully address the felt impact of development on the District and the community.

Next, the District remains concerned that the EIR does not adequately address the General Plan's potential impact on Carlmont High School, *where enrollment currently exceeds capacity*, and on Sequoia High, located in neighboring Redwood City. The EIR seems to erroneously assume that the students generated in San Carlos could simply attend Sequoia High School. Even though Sequoia High might *currently* have capacity to receive *some* of the students generated by

Limited Liability Partnership

2001 North Main Street, Suite 500 Walnut Creek, California 94596 Tel 925-953-1620 Fax 925-953-1625

development in San Carlos, that does not take into account the rapid rate of development that is currently occurring in Redwood City. The District already anticipates that Sequoia High will have difficulty serving students generated by development in Redwood City, and cannot guarantee such service to students. Further, most students generated by development in San Carlos would most logically feed into Carlmont High, which currently exceeds its capacity. There would be other potential impacts to consider here, such as facilities and budgetary impacts, as well as indirect impacts, such as increased traffic, noise, pollution, safe paths to school, etc.

Third, the EIR assumes that increased demand on school facilities will “occur incrementally.” However, the basis for that assumption is unclear based on the recent rapid growth in San Carlos. Also, whether increased demand occurs incrementally or not, the District still has the need to plan for it in advance of when those increased demands come.

In addition to these and other concerns of the District related to the EIR, the District wishes to put forth some actionable items for the City’s consideration:

1. Meet and Confer Requirements. The District requests a firm commitment from the City that when it considers approval of specific developments, the City will meet and confer in good faith with the District to consider whether the project raises school-related impacts (including indirect impacts such as traffic, pollution, noise, etc.) under the California Environmental Quality Act (“CEQA”). This could be incorporated into the EIR, or take form in a separate agreement with the City.

The District further requests that the EIR incorporate the following language applicable to developers:

The City will require developers to meet and confer with the impacted school districts prior to approval of their specific development proposals within the General Plan regarding impacts of their development on school-related issues, and further CEQA analysis shall be undertaken as needed to address these impacts, including indirect school-related impacts.

The purpose of this language is to make abundantly clear that these issues must be considered as specific projects come up, since they have not been fully considered and addressed at the General Plan stage.

2. School-Related Community Benefits. The District understands that the City negotiates certain community benefits through baseline requirements for developers or as part of community benefit negotiations in development agreements. See: City of San Carlos Website, Community Amenities, available at: https://www.cityofsancarlos.org/city_hall/departments_and_divisions/community_development/planning/community_benefits.php. The District would like to work with the City to create a project category of items that benefit District schools and students. Although the District has not yet consulted with its feeder district San Carlos School District on this topic, in theory this category could include projects that benefit both school districts.

Examples of school-related community benefit projects could potentially include:

- Workforce Housing: The District would like to explore with the City some of the ways that community benefit projects could serve District employee housing needs. The District has interest in a variety of workforce housing projects that would assist the District in retaining qualified employees to serve District students.

One example could involve a dedication by developers of a certain number or percentage of units within their project that are deed-restricted; the restriction could require that, before sale is opened to other potential buyers, there is a mandatory period in which the unit is first offered at fair market value to District employees for use as their primary residence. Such a restriction would help District employees in a competitive market, who might otherwise have difficulty competing against higher bidders and all-cash offers. Providing a path for District employees to local homeownership has a clear benefit of helping the District retain qualified employees with strong ties within the community.

Another example would be development of affordable housing projects that give priority to District employees. The affordable units could be for rent, purchase, or both. These affordable housing projects would similarly allow the District to attract and retain employees who cannot otherwise afford to live in the community where they work due to the high cost of living.

- Safe walking paths and safety features: Another idea to be explored would be sidewalk improvement projects, signage and crossing lights, bike lanes, and other transportation-related improvements designed to facilitate safe transportation corridors to and from school, with an emphasis on safe walking and biking paths.
- Other District-focused amenities: The District would like to explore other amenities that support District schools and students.

Akanksha Chopra
City of San Carlos
March 3, 2025
Page 4

We would be happy to schedule a meeting between the City of San Carlos, developers, and their respective consultants to speak about these issues, and discuss a path forward that addresses the District's needs and concerns. Let us know if that would be helpful.

Sincerely,

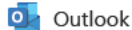
LOZANO SMITH

A handwritten signature in blue ink that reads "Kelly M. Rem". The signature is fluid and cursive, with the first name "Kelly" being the most prominent part.

Kelly M. Rem

KMR/KRB/mg

cc: Crystal Leach, Superintendent (cleach@seq.org)
Christine Gong, Assistant Superintendent, Admin. Services/CBO (cgong@seq.org)



FW: Comment on the Feb. 3, 2025 Meeting Agenda Item 6.a. - General Plan Reset



Andrea Mardesich, AICP
Assistant Community Development Director
City of San Carlos | 600 Elm Street | San Carlos, CA 94070
Phone: (650) 802-4258 | www.cityofsancarlos.org

From: Len Materman <Len@oneshoreline.org>
Sent: Monday, February 3, 2025 2:22 PM
To: Kristen Clements <kclements@cityofsancarlos.org>; Twisha Anand <tanand@cityofsancarlos.org>; Summer Bundy <sbundy@cityofsancarlos.org>; Janet Castaneda <jcastaneda@cityofsancarlos.org>; Ellen Garvey <egarvey@cityofsancarlos.org>
Cc: Andrea Mardesich <amardesich@cityofsancarlos.org>
Subject: Comment on the Feb. 3, 2025 Meeting Agenda Item 6.a. - General Plan Reset

External Sender - From: (Len Materman <Len@oneshoreline.org>).
This message came from outside your organization.

[Learn More](#)

Dear Planning and Transportation Commissioners:

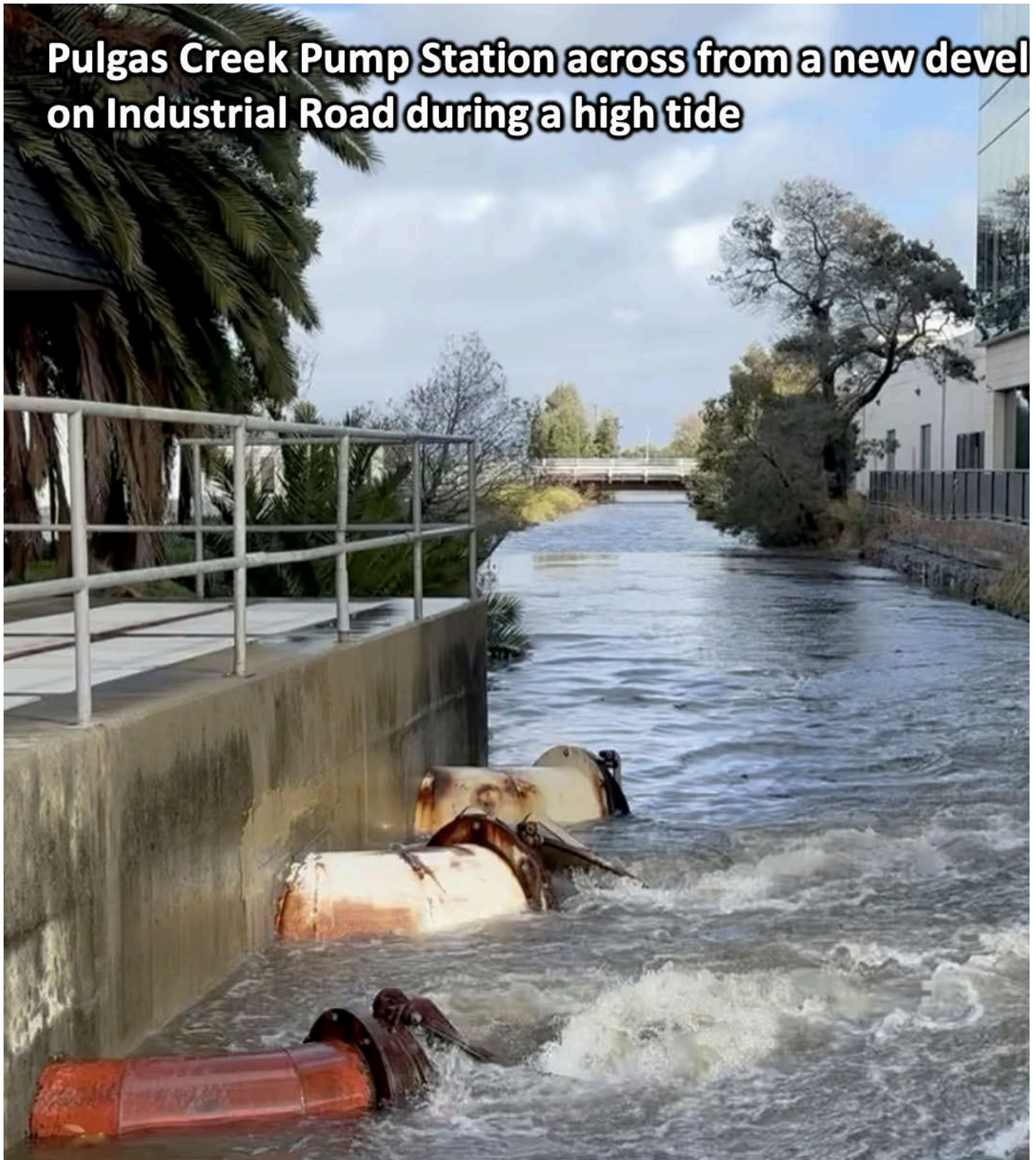
I had hoped to make a public comment in person this evening but unfortunately, I'm unable to attend so please consider the following as you discuss this topic, which is very important to the future of this City.

In addition to being a long-time resident of San Carlos, I run the San Mateo County Flood and Sea Level Rise Resiliency District, also known as OneShoreline, which was established by State legislation five years ago as the first independent government agency in California focused on planning for and building regional resilience to the impacts of climate change. We have several efforts that benefit San Carlos, from funding restoration and stormwater detention projects along Belmont Creek upstream of where it forms the San Carlos boundary, to removing debris along that Creek and along Cordilleras Creek in the areas that flood our City, to shoreline adaptation projects with San Carlos and its neighboring cities.

Today, I write about another major OneShoreline effort: to provide uniform guidance and template language for general plans, specific plans, zoning ordinances, and development agreements so that private developments and public infrastructure can function for their intended lifespan and contribute to community resilience without having to undergo costly retrofits in the future.

Related to private developments, of which there are several proposed in San Carlos, in June 2023 the OneShoreline Board adopted Policy Planning Guidance to Protect and Enhance Bay Shoreline Areas of San Mateo County (available at OneShoreline.org/planning-guidance). The picture below taken six weeks ago in an area affected by tides today provides an example for why requirements for long-term resilience, such as setbacks from, and no underground parking / key infrastructure immediately adjacent to, creeks and shorelines should be part of our zoning and enforced.

Pulgas Creek Pump Station across from a new devel on Industrial Road during a high tide



OneShoreline is now working on a similar effort related to the public infrastructure that makes our communities livable (stormwater and wastewater systems, roads, parks, marinas, and utilities).

Here is an image of Laurel Street in San Carlos, which is not generally thought of as a floodway.



We applaud the City of San Carlos for its work thus far to incorporate climate resilience language into its key documents. Today, in the document before you, I encourage you to ensure that this is done at every opportunity and is unambiguous.

Please ask yourselves: am I confident that the proposed text regarding commercial and housing developments, transportation, or parks will lead to specific City requirements — soon — to ensure that a new asset being proposed will function for its lifespan during increasingly large storms and higher tides and groundwater? If the answer is no, please add language to the General Plan document that will give you that confidence.

While a General Plan, and certainly a Climate Action Plan, will not by itself make us resilient to the impacts of climate change, a zoning ordinance that includes strong resilience requirements can make a difference. OneShoreline has seen the benefits of this in the cities we work with, so please add this to the San Carlos General Plan to help us achieve that goal for us and future generations.

Thank you for your consideration,

Len Materman

Chief Executive Officer

San Mateo County Flood and Sea Level Rise Resiliency District

[OneShoreline.org](https://www.oneshoreline.org)





February 25, 2025

Sent Via Email

City of San Carlos
 Attn: Akanksha Chopra, Associate Planner
 600 Elm Street
 San Carlos, California, 94070

Subject: Draft Environmental Impact Report (DEIR) for the 2045 General Plan Reset

Dear Ms. Chopra,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) and the 2045 General Plan Reset for the City of San Carlos.

The Local Agency Formation Commission (LAFCo) is a state mandated agency established in every county to oversee the boundaries of cities and special districts. San Mateo LAFCo has jurisdiction over the boundaries of the 20 cities, 22 independent special districts, and many of the 33 active county and city governed special districts serving San Mateo County.

The DEIR states that the scope of the study area includes land both within the existing City limits as well as lands within the LAFCo designated Sphere of Influence (SOI) of the City. LAFCo support the inclusion of the City's SOI area within the study area.

San Mateo LAFCo has the following comments on the DEIR and the 2045 General Plan Reset:

- The DEIR notes that the City is not proposing any changes to the current City general plan land use designations for lands in the SOI. The SOI is the plan for the probable physical boundaries and service areas of a local agency. The LAFCo designated SOI for the City includes the unincorporated areas of Palomar Park, Devonshire, the Hassler area. In the 2009 General Plan, the lands within the City's SOI did not have City land use designations. The DEIR and proposed General Plan 2045 amendments do not include any extension of City land use designations into the SOI. LAFCo encourages the City to evaluate potential land use designations for the parcels within the City's SOI along with the development potential of the SOI areas as part of the EIR and General Plan Reset. In addition, if there are future annexations to the City from areas within the SOI, a General

COMMISSIONERS: RAY MUELLER, CHAIR, COUNTY ▪ VIRGINIA CHANG KIRALY, VICE CHAIR, SPECIAL DISTRICT ▪ KATI MARTIN, SPECIAL DISTRICT
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ALTERNATES: KATHRYN SLATER-CARTER, SPECIAL DISTRICT ▪ GREG WRIGHT, CITY ▪ JAMES O'NEILL, PUBLIC ▪ NOELIA CORZO, COUNTY

STAFF: ROB BARTOLI, EXECUTIVE OFFICER ▪ SARAH FLAMM, MANAGEMENT ANALYST ▪ TIM FOX, LEGAL COUNSEL ▪

DIANE ESTIPONA, CLERK

Plan amendment will be required for each annexation under both the current and proposed Plan, as there is no City land use designation.

- Senate Bill 244 (2011) requires the cities and counties identify fringe, island, and legacy communities that are disadvantaged unincorporated communities. As part of SB 244, the land use element of a city or county must analyze the water, water supply, wastewater, stormwater drainage, and structural fire protection needs or deficiencies for each identified disadvantaged unincorporated community. Under this law, Palomar Park, Devonshire, the Hassler area are considered to be fringe communities, but do not meet the definition of disadvantaged. However, as Palomar Park and portions of Devonshire rely on on-site septic systems for wastewater disposal, LAFCo encourages the City to analyze wastewater needs in these two communities as part of the General Plan Reset in a similar fashion to SB 244. Recently, the City approved a sewer connection to a parcel in the SOI to address a failing septic system. It is likely that additional septic systems within the SOI area will fail within the lifespan of the 2045 General Plan Reset. The City should consider evaluating the City's sewer treatment capacity and sewer infrastructure capacity for both future development and the extension of sewer infrastructure to properties within the City's SOI as the City is the logical provider of sewer services in these areas.
- Regarding the Buildout Projects for 2024-2045, LAFCo encourages the City to also evaluate the development projections for lands within the SOI under the current County of San Mateo General Plan and Zoning regulations. and the potential of annexation of those lands to the City as part of the EIR and General Plan Update.

San Mateo LAFCo looks forward to reviewing all future documents related to the General Plan reset process and the Environmental Impact Report.

Sincerely,

Rob Bartoli

Rob Bartoli
Executive Officer
rbartoli@smcgov.org
650-363-4224



NATIVE AMERICAN HERITAGE COMMISSION

June 4, 2024

Akanksha Chopra
City of San Carlos
600 Elm Street
San Carlos CA 94070-3085

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Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

Re: 2024060037, 2045 General Plan Reset Project, San Mateo County

Dear Ms. Chopra:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines § 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

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

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

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at:

https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
- b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

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

If you have any questions or need additional information, please contact me at my email address:

[REDACTED]

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

cc: State Clearinghouse



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



July 2, 2024

Akanksha Chopra, Associate Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070
AdvancePlanning@cityofsancarlos.org

Subject: 2045 General Plan Reset, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2024060037, City of San Carlos, San Mateo County

Dear Akanksha Chopra:

The California Department of Fish and Wildlife (CDFW) has reviewed the City of San Carlos's Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the 2045 General Plan Reset (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City of San Carlos (City) as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the EIR (See: Cal. Code Regs., tit. 14, § 15082, subd. (b).).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Akanksha Chopra, Associate Planner
City of San Carlos
July 2, 2024
Page 2

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by state law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In

Akanksha Chopra, Associate Planner
City of San Carlos
July 2, 2024
Page 3

addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: 2045 General Plan Reset

Objective: The objective of the Project is to update the City of San Carlos 2030 General Plan. Primary Project activities include amending the City of San Carlos 2030 General Plan to address land use and development objective components related to buildout capacity.

Location: City of San Carlos (Citywide)

Timeframe: 2030-2045

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description including, but not limited to, the below information.

- Land use changes resulting from, for example, rezoning certain areas.
- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.
- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.

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ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream or wetland set back distances the City may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project site, include, but are not limited to the species listed in Attachment A.

Habitat descriptions and species profiles included in the draft EIR should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; Habitat Conservation Plans; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the City adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§15126.2) necessitate the draft EIR discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

Akanksha Chopra, Associate Planner
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- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Potential for impacts to special-status species;
- Loss or modification of breeding, nesting, dispersal and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g., snags, roosts, overhanging banks);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence;
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features;
- Water quality impacts as a result of the Project;
- Impacts to the bed, channel, and bank, in lakes and streams as a result of the Project; and
- Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat.

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, §15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

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July 2, 2024
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Fully protected species such as California black rail (*Laterallus jamaicensis coturniculus*) or salt-marsh harvest mouse (*Reithrodontomys raviventris*) may not be taken or possessed at any time except in limited circumstances (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the draft EIR should include measures to completely avoid take of fully protected species.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDB/Submitting-Data>. The types of information reported to CNDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES


CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP in order to assist the City of San Carlos in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jason Teichman, Environmental Scientist at [REDACTED] or [REDACTED]; or Wesley Stokes, Senior Environmental Scientist, (Supervisory), at [REDACTED] or [REDACTED].

Sincerely,

DocuSigned by:

Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

Akanksha Chopra, Associate Planner
City of San Carlos
July 2, 2024
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Attachments: Attachment A: Biological resources, City of San Carlos, California, June 26, 2024.

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2024060037)

Attachment A: Biological Resources, City of San Carlos

Common Name	Scientific Name	Federal Status	State Status	Rare Plant Rank	CDFW Status
Alameda song sparrow	Melospiza melodia pusillula	None	None		SSC
American peregrine falcon	Falco peregrinus anatum	Delisted	Delisted		
arcuate bushmallow	Malacothamnus arcuatus var. arcuatus	None	None	1B.2	
Bay checkerspot butterfly	Euphydryas editha bayensis	Threatened	None		
bent-flowered fiddleneck	Amsinckia lunaris	None	None	1B.2	
California black rail	Laterallus jamaicensis coturniculus	None	Threatened		FP
California least tern	Sternula antillarum browni	Endangered	Endangered		FP
California red-legged frog	Rana draytonii	Threatened	None		SSC
California Ridgway's rail	Rallus obsoletus obsoletus	Endangered	Endangered		FP
chaparral ragwort	Senecio aphanactis	None	None	2B.2	
Choris' popcornflower	Plagiobothrys chorisianus var. chorisianus	None	None	1B.2	
coastal marsh milk-vetch	Astragalus pycnostachyus var. pycnostachyus	None	None	1B.2	
Crystal Springs lessingia	Lessingia arachnoidea	None	None	1B.2	
double-crested cormorant	Nannopterum auritum	None	None		WL
Edgewood blind harvestman	Calicina minor	None	None		
Edgewood Park micro-blind harvestman	Microcina edgewoodensis	None	None		
foothill yellow-legged frog - central coast DPS	Rana boylei pop. 4	Threatened	Endangered		
fountain thistle	Cirsium fontinale var. fontinale	Endangered	Endangered	1B.1	
fragrant fritillary	Fritillaria liliacea	None	None	1B.2	
Franciscan onion	Allium peninsulare var. franciscanum	None	None	1B.2	
great blue heron	Ardea herodias	None	None		
green sturgeon - southern DPS	Acipenser medirostris pop. 1	Threatened	None		SSC
hoary bat	Lasiurus cinereus	None	None		
Kings Mountain manzanita	Arctostaphylos regismontana	None	None	1B.2	
Marin western flax	Hesperolinon congestum	Threatened	Threatened	1B.1	
northern harrier	Circus hudsonius	None	None		SSC
pallid bat	Antrozous pallidus	None	None		SSC
Point Reyes salty bird's-beak	Chloropyron maritimum ssp. palustre	None	None	1B.2	
Ricksecker's water scavenger beetle	Hydrochara rickseckeri	None	None		
saline clover	Trifolium hydrophilum	None	None	1B.2	
saltmarsh common yellowthroat	Geothlypis trichas sinuosa	None	None		SSC
salt-marsh harvest mouse	Reithrodontomys raviventris	Endangered	Endangered		FP
salt-marsh wandering shrew	Sorex vagrans halicoetes	None	None		SSC
San Francisco champion	Silene verecunda ssp. verecunda	None	None	1B.2	
San Francisco collinsia	Collinsia multicolor	None	None	1B.2	
San Francisco dusky-footed woodrat	Neotoma fuscipes annectens	None	None		SSC
San Francisco gartersnake	Thamnophis sirtalis tetrataenia	Endangered	Endangered		FP
San Francisco owl's-clover	Triphysaria floribunda	None	None	1B.2	
San Mateo thorn-mint	Acanthomintha duttonii	Endangered	Endangered	1B.1	
Santa Cruz kangaroo rat	Dipodomys venustus venustus	None	None		
Serpentine Bunchgrass	Serpentine Bunchgrass	None	None		
short-eared owl	Asio flammeus	None	None		SSC
western bumble bee	Bombus occidentalis	None	Candidate Endangered		
western leatherwood	Dirca occidentalis	None	None	1B.2	
western pond turtle	Emys marmorata	Proposed Threatened	None		SSC
western snowy plover	Charadrius nivosus nivosus	Threatened	None		SSC
white-rayed pentachaeta	Pentachaeta bellidiflora	Endangered	Endangered	1B.1	
woodland woollythreads	Monolopia gracilens	None	None	1B.2	
yellow rail	Coturnicops noveboracensis	None	None		SSC

Biological resources that may occur in the City of San Carlos, California, California Natural Diversity Database (CNDDDB), June 26, 2024



July 2, 2024

Lisa Porras, Planning Manager
City of San Carlos
600 Elm Street
San Carlos, CA 94070-3085

c/o: Akanksha Chopra, Associate Planner, AdvancePlanning@cityofsancarlos.org

RE: Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the 2045 General Plan Reset [2045 General Plan Reset EIR]

The City of Redwood City appreciates the opportunity to review the Notice of Preparation for the Draft EIR for San Carlos' 2045 General Plan Reset.

Redwood City understands the City of San Carlos no longer uses Level of Service as a CEQA impact and now uses Vehicle Miles Travelled (VMT) as the adopted CEQA metric to analyze transportation impacts. While not required by CEQA, Redwood City would like to know if San Carlos would be undertaking a Local Transportation Analysis (LTA) and if so, what intersections bordering Redwood City/San Carlos would be included in the LTA.

Redwood City is currently in the process of designing a Transportation Management Association (TMA) for Redwood City, one of the goals which is to coordinate Transportation Demand Management (TDM) efforts of individual development projects to reduce VMT in Redwood City. Redwood City wanted to identify our work on the TMA as an opportunity for collaboration and future cross participation between our cities. If you have any questions about Redwood City's TMA efforts, please feel free to contact Christian Hammack, Parking/TDM Manager, Engineering & Transportation Department, at [REDACTED] or [REDACTED].

Thank you again for your continued outreach and coordination with Redwood City. If you have any questions or concerns about these comments, please feel free to contact me at [REDACTED] or [REDACTED].

Best,

Melinda Hue

Melinda Hue, Principal Planner - CEQA Coordinator
Redwood City Community Development Department, Planning Division

cc: Jeff Schwob, Community Development Director; Sue Exline, Assistant Community Development Director; Christian Hammack, Parking/TDM Manager; Malahat Owrang, Senior Transportation Planner

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



July 3, 2024

SCH #: 2024060037
GTS #: 04-SM-2024-00580
GTS ID: 33077
Co/Rt/Pm: SM/VAR/VAR

Akanksha Chopra, Associate Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070-3085

Re: 2045 General Plan Reset — Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Akanksha Chopra:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 2045 General Plan (GP) Reset. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2024 NOP.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project is an update to the City of San Carlos' 2030 GP to amend the buildout capacity. Citywide development projections for growth through 2045 include the estimated net addition of 7,300 housing units, 14,000 new residents, 6,570,500 non-residential square footage, and 19,000 jobs. Sections of U.S. Route 101 (U.S. 101) and State Route 82 (SR-82) are within the San Carlos city limits.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

Per the Initial Study, this project may have a potentially significant VMT impact which will be further evaluated in the DEIR. Caltrans looks forward to reviewing the VMT analysis when the DEIR is available.

Multimodal Transportation Planning

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the GP development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via [REDACTED]. For future early coordination opportunities or project referrals, please contact [REDACTED].

Sincerely,

Akanksha Chopra, Associate Planner
July 3, 2024
Page 3

A handwritten signature in black ink, appearing to read 'Luo Yunsheng'.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse



July 3, 2024

Sent Via Email

City of San Carlos
 Attn: Akanksha Chopra, Associate Planner
 600 Elm Street
 San Carlos, California, 94070

Subject: Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the 2045 General Plan Reset

Dear Ms. Chopra,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the 2045 General Plan Reset for the City of San Carlos.

The Local Agency Formation Commission (LAFCo) is a state mandated agency established in every county to oversee the boundaries of cities and special districts. San Mateo LAFCo has jurisdiction over the boundaries of the 20 cities, 22 independent special districts, and many of the 33 active county and city governed special districts serving San Mateo County.

The NOP states that the scope of the study area includes land both within the existing City limits as well as lands within the LAFCo designated Sphere of Influence (SOI) of the City. LAFCo support the inclusion of the City's SOI area within the study area.

San Mateo LAFCo has the following comments on the NOP for the proposed 2045 General Plan Reset:

- LAFCo encourages the City to review current City general plan land use designations for lands in the SOI. In the 2009 General Plan, the lands within the City's SOI do not have City land use designations. The City could evaluate potential land use designations for the parcels within the City's SOI along the development potential of the SOI areas as part of the EIR and General Plan reset.
- The NOP notes the Draft Citywide Net New Development Projections for 2024-2045. LAFCo encourages the City to also evaluate the development projections for lands

COMMISSIONERS: KATI MARTIN, CHAIR, SPECIAL DISTRICT ▪ RAY MUELLER, VICE CHAIR, COUNTY ▪ VIRGINIA CHANG-KIRALY, SPECIAL DISTRICT ▪ HARVEY RARBACK, CITY ▪ TYGARJAS BIGSTYCK, CITY ▪ WARREN SLOCUM, COUNTY ▪ ANN DRAPER, PUBLIC

ALTERNATES: CHRIS MICKELSEN, SPECIAL DISTRICT ▪ ANN SCHNEIDER, CITY ▪ JAMES O'NEILL, PUBLIC ▪ NOELIA CORZO, COUNTY

STAFF: ROB BARTOLI, EXECUTIVE OFFICER ▪ VACANT, MANAGEMENT ANALYST ▪ TIM FOX, LEGAL COUNSEL ▪

DIANE ESTIPONA, CLERK

within the SOI and the potential of annexation of those lands to the City as part of the EIR and General Plan Update.

- Several areas within the City's SOI such as Palomar Park and portions of Devonshire rely on on-site septic systems for wastewater disposal. In the EIR and the General Plan reset, the City should consider evaluating the City's sewer treatment capacity and sewer infrastructure capacity for both future development and the extension of sewer infrastructure to properties within the City's SOI.

San Mateo LAFCo looks forward to reviewing all future documents related to the General Plan reset process and the Draft Environmental Impact Report.

Sincerely,

Rob Bartoli

Rob Bartoli
Executive Officer





Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 20, 2024

Akanksha Chopra
Associate Planner
City of San Carlos
600 Elm Street
San Carlos, CA 94070-3085

AdvancePlanning@cityofsancarlos.org

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE 2045 GENERAL PLAN RESET DATED JUNE 3, 2024 STATE
CLEARINGHOUSE NUMBER [2024060037](#)

Dear Akanksha Chopra,

The Department of Toxic Substances Control (DTSC) received a Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the 2045 General Plan Reset (project). The proposed project is an update to the City of San Carlos 2030 General Plan to amend the buildout capacity of the City of San Carlos General Plan.


DTSC requests consideration of the following comments:

1. The proposed project encompasses multiple active and nonactive mitigation and clean-up sites where DTSC has conducted oversight that may be impacted as a result of this project. This may restrict what construction activities are permissible in the proposed project areas in order to avoid any impacts to human health and the environment.
2. Due to the broad scope of the project, DTSC is unable to determine the

locations of the proposed sites, whether they are listed as having documented contamination, land use restrictions, or whether there is the potential for the sites to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, DTSC recommends providing further information on the proposed project and areas that may fall under DTSC's oversight within future environmental documents. Once received, DTSC may provide additional comments on future environmental documents as further information becomes available. Please review the project area in [EnviroStor](#), DTSC's public-facing database.

DTSC believes the City of San Carlos must address these comments to determine if any significant impacts under the California Environmental Quality Act (CEQA) will occur and, if necessary, avoid significant impacts under CEQA. DTSC recommends the department connect with our unit if any hazardous waste projects managed or overseen by DTSC are discovered.

Please refer to the [City of San Carlos EnviroStor Map](#) for additional information about the areas of potential contamination. If further concerns or impacts surface in light of the forthcoming EIR, DTSC reserves the right to provide applicable comments at that time.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the 2045 General Plan Reset. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via  for additional guidance.

Akanksha Chopra

June 20, 2024

Page 3

Sincerely,

Dave Kereazis

Dave Kereazis

Associate Environmental Planner

HWMP - Permitting Division – CEQA Unit

Department of Toxic Substances Control

[REDACTED]

cc: (via email)

Governor's Office of Planning and Research

State Clearinghouse

State.Clearinghouse@opr.ca.gov

Tamara Purvis

Associate Environmental Planner

HWMP – Permitting Division - CEQA Unit

Department of Toxic Substances Control

[REDACTED]

Scott Wiley

Associate Governmental Program Analyst

HWMP – Permitting Division - CEQA Unit

Department of Toxic Substances Control

[REDACTED]



Lozano Smith

ATTORNEYS AT LAW

Kelly M. Rem
Attorney at Law

E-mail: [REDACTED]

October 18, 2024

By E-Mail: [REDACTED]

Madeline Miller
Project Planner
Placeworks

Re: Response of Sequoia Union High School District to Questions Regarding School Facilities Impacts and City of San Carlos to Notice of Preparation for the 2045 General Plan Reset

Dear Ms. Miller:

This office represents Sequoia Union High School District ("District"). Thank you for reaching out and providing the District with the opportunity to provide comments and input regarding the school facilities impacts related to the City of San Carlos to Environmental Impact Report ("EIR") for the 2045 General Plan Reset ("General Plan"). This letter supplements the information the District sent you in its September 27, 2024 e-mail correspondence.

We look forward to working with the City of San Carlos to ensure that the General Plan's anticipated impacts are fully analyzed, understood, and ultimately mitigated. We understand that the General Plan includes an inventory of housing sites with a projected capacity for up to 8,300 new homes. The implementation of the General Plan's programs to facilitate development of housing sites would have an impact on the District's schools, particularly Sequoia High School and Carlmont High School.

Before addressing the specific questions you have raised, we'd like to clarify that there are a wide variety of potential impacts posed by large scale commercial and residential development projects within District boundaries. The questionnaire you have provided seeks information primarily related to the District's current and projected enrollment, capacity, developer fees, and facilities planning.

Generally speaking, there are two different types of development impacts on schools: (1) impacts on the District's budget for the education of students, and (2) impacts related to District school facilities, including indirect impacts such as traffic, safe paths to school, noise, and air pollution.

Limited Liability Partnership

2001 North Main Street, Suite 500 Walnut Creek, California 94596 Tel 925-953-1620 Fax 925-953-1625

The first type of impact interferes with the District's need for or ability to obtain revenue received through property taxes that goes toward the overall operation of schools, staff salaries, and into the classroom. These funds are generally not used for facilities.

The second type of impact creates a need for new, expanded, or modernized school facilities in order to maintain safe and acceptable district service and performance objectives. Developers and lead agencies often assume that the only impact development can have on school district facilities is through the introduction of more students. Developers then build on this assumption to conclude that a development's introduction of new students will either create a need for new school facilities (if a district is over capacity), or it will not (if the district is under capacity). In any event, developers typically rely on Government Code section 65996 and Senate Bill 50 ("SB 50"), for the assertion that all demands placed on school district facilities can be mitigated simply by the payment of statutory developer fees.

The above assumptions are both practically and legally incorrect. First, development projects can impose a wide variety of impacts related to school facilities beyond the simple need to acquire more or expand existing facilities to accommodate increased enrollment. For example, new residential and commercial projects often introduce hundreds of new cars into neighborhoods where there are existing schools, or along paths of travel that are frequently used by students and their families to get to school. These increases in traffic pose numerous other impacts on the District and District families, including dangerous traffic conditions caused by an increase in vehicles on roads that are not equipped to handle heavy traffic levels; increased commute times; increased vehicle exhaust and pollution; increased noise from construction; and a reduction in available parking for District staff, students, and families. These impacts, in turn, necessitate that the District take action to continue safely and effectively providing its education program by diverting students from one school to another, acquiring more land to use as parking or other school facilities, and/or modernizing existing facilities or intersections to mitigate the above impacts.

The payment of statutory developer fees is not adequate to resolve all of the above impacts. Many developers and lead agencies assert that if a school district will have enough seats to house additional students generated by development, Government Code section 65996 allows for the conclusion that "payment of the applicable school impact fee is deemed to be full and complete mitigation under CEQA for impacts on school facilities." **This approach is inconsistent with California law, as California courts have acknowledged that developer fees do not constitute full and complete mitigation for school-related impacts other than school overcrowding.** (*Chawanakee Unified Sch. Dist. v. Cty. of Madera* (2011) 196 Cal.App.4th 1016 ("Chawanakee").) In other words, California courts have held that developer fees serve as complete mitigation only for certain impacts on school facilities caused by overcrowding. Developer fees do not, however, serve as complete mitigation for all other impacts on school districts or related to school district facilities, including those related to traffic, noise, air quality, and pedestrian safety, which impacts must be analyzed during the CEQA process.

Additionally, from a practical perspective, the amount of developer fees received by school districts typically fall woefully short of alleviating the wide variety of impacts caused by development. This is due largely to the facts that: (1) statutory developer fee amounts fail to acknowledge the differences in costs of school construction from one district to another, which

particularly burdens school districts in the Bay Area, where both land and construction costs exceed other parts of the state; (2) the developer fee amounts fail to contemplate the special facilities needs of those districts experiencing rapid growth, such as the need for portables; and (3) the adjustment formula for developer fees is based on a “construction cost index” and does not include indexing related to the increases in land costs, resulting in the actual costs of facilities (i.e., land and improvements) increasing at a greater rate than the adjustment.

The inadequacy of developer fees as a source of funding for school facilities has forced school districts to rely increasingly on other sources of funding, primarily including local bond funds and State bond funds administered under the School Facilities Program (SFP). However, these sources of funds can be equally unreliable. Local bond funds are difficult to generate, as local bonds are subject to school district bonding capacity limitations and voter approval. State funds are also unreliable and take considerable time to obtain. Either way, the funding formula was never intended to require the State and local taxpayers to shoulder a disproportionate share of the cost of school facilities.

In sum, the interplay between new development and the wide variety of resulting impacts on schools presents unique and complex issues, all of which must be analyzed through the CEQA process. Impacts that do not initially present as “fiscal impacts” to the District, like traffic impacts that affect a student population, often end up having significant fiscal impacts on the District. Many of these impacts can be reduced or even avoided by ensuring that the developers work with the District in order to ensure the availability of facilities or other appropriate mitigation in the Project area in a timely fashion.

Within the context of this information, below you will find the District’s responses to your inquiries:

1. *Please confirm that the Existing Conditions information below is accurate, or update as needed.*

Most of the students within San Carlos would attend Carlmont High, with some of the students attending Sequoia High. It is confirmed that total enrollment is 9,741 students.

2. *Does the school district identify Developer Impact Fees for new development? If so, please describe the fees.*

The District’s September 27, 2024, response should be corrected to accurately reflect the developer fees the District imposes. The District is subject to a fee-sharing agreement with its feeder elementary school districts that only authorizes the District to levy forty percent (40%) of the total fees authorized by Government Code section 65995, subdivision (b)(3), for development in areas which the District provides school services. The remaining permitted fees are allocated to feeder elementary school district(s) within whose boundaries the residential, commercial, or industrial development will occur.

Based on the fee-sharing agreement, the District currently imposes statutory “Level 1” developer fees in the amount of **\$2.07 per square foot for residential development** (40% of \$5.17 per

square foot) and **\$0.34 per square foot of commercial or industrial development** (40% of \$0.84 per square foot).

3. *What is the capacity of the schools serving San Carlos? Does the School District currently exceed its student capacity and, if so, by how much?*

The capacity of Carlmont High School is 2,343. Its current enrollment is 2,360 students, so it is currently exceeding its capacity by seventeen (17) students. Therefore, the District's prior response indicating that it does not exceed its student capacity should be corrected to reflect that ***Carlmont High currently exceeds its capacity.***

The capacity of Sequoia High School is 2,515. Its current enrollment is 1,903. Although there is some capacity at Sequoia High School that could be used to house students generated by new development in San Carlos, as mentioned, the majority of students in San Carlos would likely attend or wish to attend Carlmont High. Adding students to Sequoia High would not be a long-term solution and would result in negative impacts, such as increased traffic (see discussion above). Further, Sequoia High will be needed to house students resulting from development in Redwood City.

4. *What are the student enrollment projections for SUHSD? Does the School District anticipate that enrollment will exceed capacity at any of its schools?*

Enrollment projections are uncertain, as enrollment depends on a variety of factors, both known and unknown. Addition of 8,300 new homes to San Carlos, as anticipated in the General Plan, will undoubtedly have an impact on District enrollment.

As stated above, Carlmont High is already exceeding its capacity. The General Plan's projected level of development may exacerbate this issue.

5. *What are the student generation rates the District uses to determine enrollment projections?*

As stated above, enrollment projections are uncertain. However, the Residential Development Research Report prepared by PowerSchool for Fall 2024, dated September 15, 2023, identified student generation rates of .14 for single family detached units, .09 for single family attached units, and .10 for multi-family units. A copy of the report is enclosed with this letter.

We note that the PowerSchool report was submitted on September 23, 2023, when anticipated potential development was 3,805 residential units in the *entire* District over the next ten (10) years. Given that the General Plan is anticipating 8,300 homes in San Carlos *alone* over the next twenty (20) years, the District may need to reevaluate projections based on the aggressive growth that the City of San Carlos now anticipates.

6. *Are there any plans for new or expanded school facilities? If so, where, to what extent, and when are the expanded or new facilities expected to commence?*

The District's 2023 Facilities Master Plan identifies plans for a new T-Wing, Terrace Building, and Administrative/Student Support Building at Carlmont High, as well as renovation, modernization, and other site projects for that site. For Sequoia High, the Master Plan anticipates a new classroom building and modernization of existing buildings. (See: <https://www.seq.org/DEPARTMENTS/Administrative-Services/Construction/Facilities-Master-Plan/index.html>.) Construction is still in the planning stage.

In order to accommodate students generated by 8,300 new homes, it is likely that the District will be required to construct new facilities or expand existing facilities, and also to modernize existing facilities to maintain the existing level of service.

7. *Please provide any current documents on school services including background reports, policy documents, and facility plans that you think would help with preparing the environmental review analysis for impacts to school facilities as a result of the proposed 2045 General Plan Reset.*

In addition to the link to the Board Agenda on item for March 6, 2024, that was previously provided, the following documents are identified:

- Facilities Master Plan, Sequoia Union High School District (updated September 18, 2023), available at:
https://drive.google.com/file/d/14TDfrmql5JL_hyY5rvijXM0bR7_9yC6A/view
- Sequoia Union High School District, Resolution No. 011, Increase in School Facilities Fees and Adoption of CEQA Notice of Exemption, available at:
<https://www.seq.org/documents/Departments/Admin%20Services/Maintenance%20and%20Operations/Resolutions%20and%20Justification%20Reports/RESOLUTION-No.-011-INCREASE-IN-SCHOOL-FACILITIES-FEES-AND-ADOPTION-OF-CEQA-NOTICE-OF-EXEMPTION-3-6-24.pdf>
- Level I Developer Fee Study for Sequoia Union High School District, prepared by Jack Schreder & Associates on January 29, 2024, available at:
<https://www.seq.org/documents/Departments/Admin%20Services/Maintenance%20and%20Operations/Resolutions%20and%20Justification%20Reports/Developer-Fee-Justification-Study-March-2024.pdf>
- Residential Development Research Report prepared by PowerSchool for Fall 2024, dated September 15, 2023 (enclosed)

Madeline Miller
October 18, 2024
Page 6

Thank you for your consideration of the District's concerns. While we appreciate your effort to collect information from the District, the issues you are investigating are complex. Rather than exchanging emails and answering lists of questions, we suggest that it would be far more beneficial if we could have a meeting with the City of San Carlos, developers, and their respective consultants to speak about these issues and develop a fuller understanding of the District's needs and the effects of the General Plan. We would be happy to coordinate such a meeting.

Sincerely,

LOZANO SMITH

A handwritten signature in blue ink that reads "Kelly M. Rem". The signature is fluid and cursive, with the first name "Kelly" being more prominent.

KMR/KRB/mag

cc: Alexis Mena ([REDACTED])
Akanksha Chopra ([REDACTED])
Lisa Porras ([REDACTED])
Crystal Leach, Superintendent ([REDACTED])
Christine Gong, Assistant Superintendent, Admin. Services/CBO ([REDACTED])

Enclosure: Residential Development Research Report

RESIDENTIAL DEVELOPMENT RESEARCH REPORT

FALL 2024

PREPARED FOR:
SEQUOIA UNION HIGH SCHOOL DISTRICT

PREPARED BY:
The logo for PowerSchool, featuring a stylized blue 'P' icon followed by the word 'PowerSchool' in a blue sans-serif font.

SUBMITTED: SEPTEMBER 15, 2023

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SEQUOIA UNION HIGH SCHOOL DISTRICT

EXECUTIVE SUMMARY

NEW RESIDENTIAL DEVELOPMENT – FALL 2024

Predictive Enrollment Analytics is pleased to present this report of findings to the Sequoia Union High School District. Based on information collected from the local planning department(s) and developer(s) as of Sep-23, it is anticipated that the district could potentially experience the construction and occupation of 3,805 new dwelling units over the next 10 years. This total unit count includes 103 Single Family Detached units, 421 Single Family Attached units, and 3,281 Multifamily units.

STUDENT GENERATION RATE ASSUMPTIONS

The student generation rates applied to these projections are our default rates, which have been prepared based on a comprehensive review of recently-constructed dwelling units with similar characteristics. The total across all grade ranges for the district (9-12), is 0.14 for Single Family Detached units, 0.09 for Single Family Attached units, and 0.10 for Multifamily units.

ANTICIPATED IMPACT OF NEW RESIDENTIAL DEVELOPMENT

Both a Moderate and Conservative Dwelling Unit ("DU") Scenario have been generated for the district. The 10-year projection of 9-12 students generated by proposed new residential development for the Moderate and Conservative DU Scenarios are shown in the tables below. The "Annual" row projects the number of students new to the district from these units, in a given year. The "Aggregate" row reflects both new students in a given year plus the matriculation of previous years' students from one grade to the next (this number removes students who will have matriculated out of the district).

Students Generated by Residential Development (Moderate DU Scenario)										
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Aggregate		142	234	272	312	336	351	346	343	349
Annual	55	93	116	87	110	101	104	85	89	90

Students Generated by Residential Development (Conservative DU Scenario)										
	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Aggregate		122	202	251	297	326	340	348	346	349
Annual	45	82	100	92	107	102	99	96	88	90

MORE INFORMATION

A richer and more comprehensive review is contained in the Residential Development Research Report accompanying this Executive Summary. A wealth of more detailed information and analysis is also quickly and easily accessible online.

Respectfully Prepared and Submitted by:

The **Predictive Enrollment Analytics** Team

September 15, 2023

SEQUOIA UNION HIGH SCHOOL DISTRICT

RESIDENTIAL DEVELOPMENT RESEARCH METHODOLOGY AND DATA

RESEARCH METHODOLOGY

The residential research team works with the school district's local planning department(s) to compile a list of all active residential development projects within the district. When putting together this list of projects, we include only active, non-senior residential projects larger than 10 units. We believe this to be the most efficient way to build a picture of the district's future residential changes, since smaller projects would generally have a negligible impact on the district. These active projects would include developments either currently under construction, those with active entitlements, or any proposed future projects.

We then follow up with developers to gather as much information as possible on the project's unit type(s), planned build-out unit counts, construction schedules, etc. From these data, we create two scenarios. The Moderate DU Scenario is directly based on information provided by the planning departments and developers regarding anticipated construction schedules and unit occupancies. The Conservative DU Scenario is derived from the Moderate's by assuming occupancies will occur over a longer period. Because of this, the unit totals in the Conservative DU Scenario may be less than those of the Moderate DU Scenario if they are pushed out beyond the next 10 years. Similarly, because of these adjustments, in any given year it may also be possible for the annual number totals of the Conservative DU Scenario to exceed those of the Moderate DU Scenario.

DWELLING UNIT TYPES

New dwelling units are categorized into the following three (3) housing types:

- **Single Family Detached ("SFD")** – Units are stand-alone structures on their own lot with a unique Assessor's parcel number.
- **Single Family Attached ("SFA")** – Units share common walls, usually on both sides of the property, where each is assigned a unique Assessor's parcel number (e.g., townhomes, condominiums, duplexes).
- **Multifamily ("MF")** – Units share common walls in a building or structure designed to house several families in separate housing units. All units are on the same lot with one Assessor's parcel number (e.g., apartments).

ACTIVE RESIDENTIAL DEVELOPMENT PROJECTS WITHIN THE DISTRICT

Based on information collected from the local planning department(s) and developer(s) as of Sep-23, it is anticipated that the district could potentially experience the construction and occupation of 3,805 new dwelling units over the next 10 years. The total unit count included in the Moderate DU Scenario is broken out as shown in the table below.

New Dwelling Units by Unit Type	
Unit Type	# of Units
Single Family Detached	103
Single Family Attached	421
Multifamily	3,281
Totals:	3,805

FIGURE 1

The two tables below provide the project name, unit type, and anticipated occupancy data for all active, non-senior residential development projects greater than 10 units planned to be occupied over the next 10 years.

This table shows the Moderate DU Scenario which is directly based on information provided by the planning departments and developers regarding anticipated construction schedules and unit occupancies.

Proposed Dwelling Units within the Sequoia Union High School District (Moderate DU Scenario)												
Project Name	Unit Type	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
11 El Camino Rea	MF	0	109	133	0	0	0	0	0	0	0	242
111 Independence Dr.	MF	0	0	50	55	0	0	0	0	0	0	105
1383 Laurel Street	MF	0	15	0	0	0	0	0	0	0	0	15
201 El Camino Real	MF	0	0	12	0	0	0	0	0	0	0	12
560 El Camino Real	MF	0	24	0	0	0	0	0	0	0	0	24
60 Vista Del Grande	SFA	0	0	89	0	0	0	0	0	0	0	89
808 Alameda de Las Pulgas	SFD	0	87	0	0	0	0	0	0	0	0	87
847 Woodside	MF	0	0	0	0	22	22	0	0	0	0	44
Broadway Plaza	MF	0	260	260	0	0	0	0	0	0	0	520
Charter Street	MF	0	36	36	0	0	0	0	0	0	0	72
Laurel Way Subdivision	SFD	0	0	0	16	0	0	0	0	0	0	16
Menlo Flats	MF	0	0	0	0	50	50	50	0	0	0	150
Menlo Portal	MF	75	75	75	35	0	0	0	0	0	0	260
Menlo Uptown	SFA	14	14	0	0	0	0	0	0	0	0	28
Menlo Uptown	MF	221	0	0	0	0	0	0	0	0	0	221
MidPen	MF	90	0	0	0	0	0	0	0	0	0	90
Parkline	SFA	0	0	0	0	50	50	0	0	0	0	100
Parkline	MF	0	0	0	0	100	100	100	0	0	0	300
Sobrato	SFA	0	0	0	0	60	56	0	0	0	0	116
Sobrato	MF	0	0	0	0	100	100	116	0	0	0	316
South Main Mixed-Use	MF	110	110	110	100	0	0	0	0	0	0	430
Strada	SFA	43	45	0	0	0	0	0	0	0	0	88
Syufy Site	MF	0	0	160	160	160	0	0	0	0	0	480
Totals:		553	775	925	366	542	378	266	0	0	0	3805

FIGURE 2

This table shows the Conservative DU Scenario which is derived from the Moderate's by assuming occupancies will occur over a longer period.

Proposed Dwelling Units within the Sequoia Union High School District (Conservative DU Scenario)												
Project Name	Unit Type	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	Total
11 El Camino Rea	MF	0	99	113	30	0	0	0	0	0	0	242
111 Independence Dr.	MF	0	0	40	44	21	0	0	0	0	0	105
1383 Laurel Street	MF	0	12	3	0	0	0	0	0	0	0	15
201 El Camino Real	MF	0	0	10	2	0	0	0	0	0	0	12
560 El Camino Real	MF	0	20	4	0	0	0	0	0	0	0	24
60 Vista Del Grande	SFA	0	0	79	10	0	0	0	0	0	0	89
808 Alameda de Las Pulgas	SFD	0	77	10	0	0	0	0	0	0	0	87
847 Woodside	MF	0	0	0	0	18	18	8	0	0	0	44
Broadway Plaza	MF	0	208	208	104	0	0	0	0	0	0	520
Charter Street	MF	0	29	29	14	0	0	0	0	0	0	72
Laurel Way Subdivision	SFD	0	0	0	13	3	0	0	0	0	0	16
Menlo Flats	MF	0	0	0	0	40	40	40	30	0	0	150
Menlo Portal	MF	60	60	60	60	20	0	0	0	0	0	260
Menlo Uptown	SFA	11	11	6	0	0	0	0	0	0	0	28
Menlo Uptown	MF	177	44	0	0	0	0	0	0	0	0	221
MidPen	MF	80	10	0	0	0	0	0	0	0	0	90
Parkline	SFA	0	0	0	0	40	40	20	0	0	0	100
Parkline	MF	0	0	0	0	80	80	80	60	0	0	300
Sobrato	SFA	0	0	0	0	48	48	20	0	0	0	116
Sobrato	MF	0	0	0	0	80	80	93	63	0	0	316
South Main Mixed-Use	MF	88	88	88	88	78	0	0	0	0	0	430
Strada	SFA	34	36	18	0	0	0	0	0	0	0	88
Syufy Site	MF	0	0	128	128	128	96	0	0	0	0	480
Totals:		450	694	796	493	556	402	261	153	0	0	3805

FIGURE 3

The graph below shows the anticipated occupancy data accumulated by year for all active, non-senior residential development projects greater than 10 units planned to be occupied over the next 10 years.

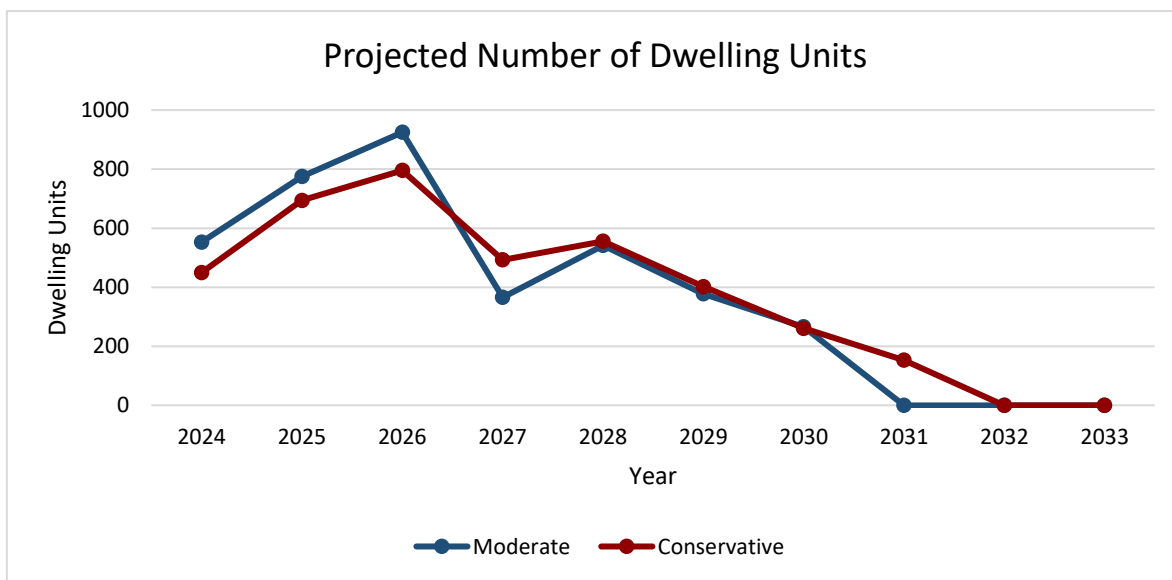


FIGURE 4

The locations of each of these future residential development projects is shown in the map below. Please note that the exact location of these new development projects may be refined as additional information is made available.

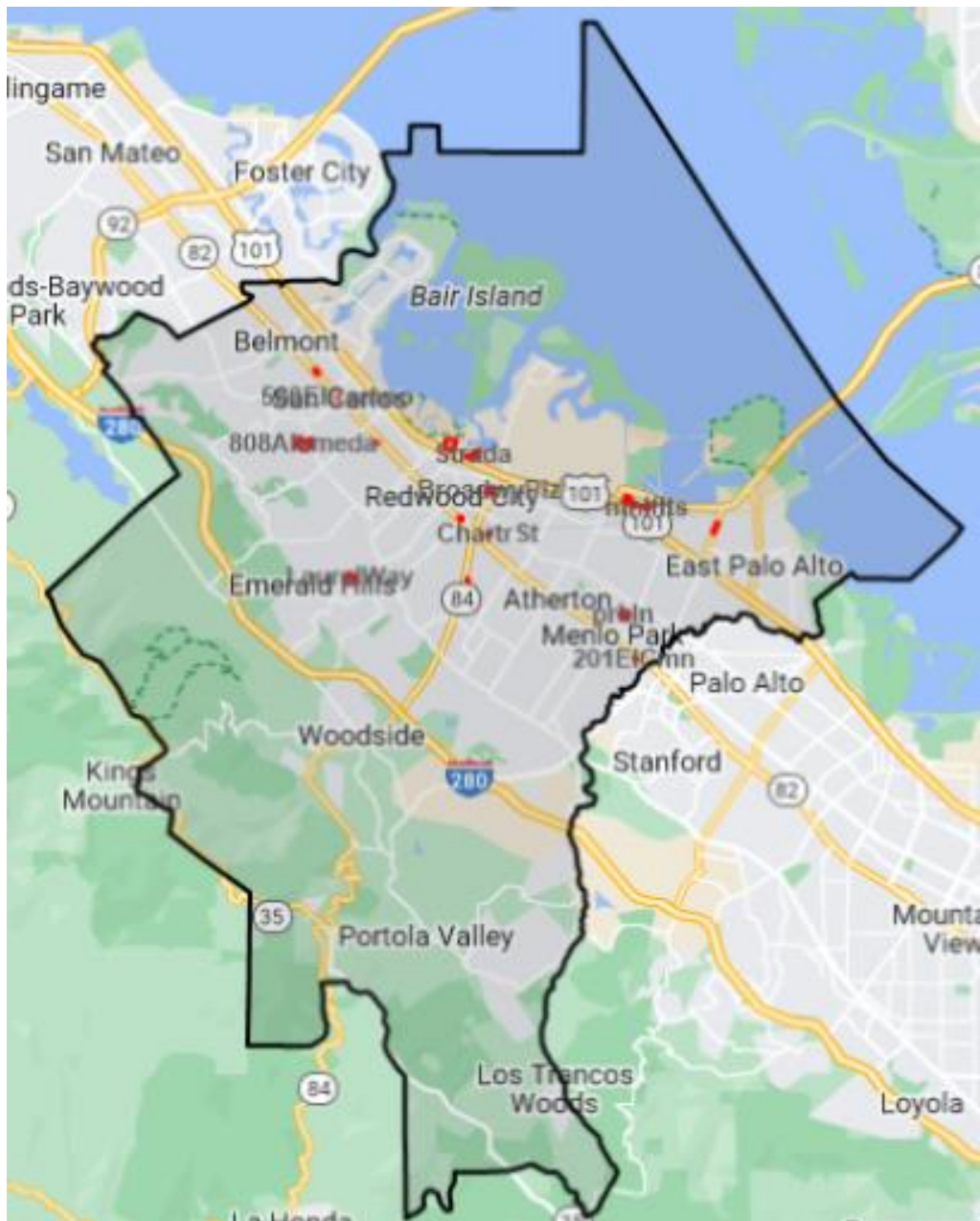


FIGURE 5

STUDENT GENERATION RATE ASSUMPTIONS

Student generation rates are determined for each dwelling unit type for each school level (elementary, middle, and high where applicable). The student generation rates applied to these projections are our default rates, which have been prepared based on a comprehensive review of recently-constructed dwelling units with similar characteristics. The table below shows the student generation rate assumptions by unit type. Although these student generation rates are broken out by a 9-12 grade configuration, the calculated student impact from new development within the enrollment projection studies will be aligned with each school's defined grade configurations.

Student Generation Rates by Unit Type & School Level			
School Level	SFD Units	SFA Units	MF Units
High School (9-12)	0.14	0.09	0.10
Totals:	0.14	0.09	0.10

FIGURE 6

Typically, the Conservative rates are calculated as a slight adjustment down from the Moderate rates to anticipate a diminution in family size over an extended period. A full list of the student generation rates applied over the next 10 years within the Moderate and Conservative DU Scenarios is shown in Appendix A.

PROJECTED STUDENTS FROM NEW RESIDENTIAL DEVELOPMENT

To calculate the projected student enrollment from the new residential development planned within the district, the number of each unit type was multiplied by the appropriate student generation rates for each of the next 10 years. The geographical location of each project is utilized to calculate the student impact by studyblock, which ultimately determines which schools we would anticipate being impacted. For each school level, students generated by new residential development are distributed across grade levels. These percentages are based on historical patterns where they exist; otherwise, default percentages are used. Furthermore, student matriculation is considered to accurately model the student impact over the enrollment projections studies' 10-year timeframe. The results of these operations for the Moderate and Conservative DU Scenarios are shown in the tables below.

Projected Students from New Residential Development (Moderate DU Scenario)										
Grade	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
9	16	37	58	61	73	76	85	85	89	90
10	16	41	62	69	77	84	84	85	85	89
11	16	41	66	73	85	88	92	84	85	85
12	5	24	49	69	78	89	91	92	84	85
High:	55	142	234	272	312	336	351	346	343	349
Total:	55	142	234	272	312	336	351	346	343	349

FIGURE 7

Projected Students from New Residential Development (Conservative DU Scenario)										
Grade	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
9	13	32	50	58	69	74	81	86	88	90
10	13	35	53	64	74	81	82	86	86	88
11	13	35	57	68	81	86	88	87	86	86
12	4	21	42	61	73	85	89	90	87	86
High:	45	122	202	251	297	326	340	348	346	349
Total:	45	122	202	251	297	326	340	348	346	349

FIGURE 8

The graph below shows the projected student enrollment from the new residential development within the Moderate and Conservative DU Scenarios. More detailed information on the projected numbers of students generated by project and by studyblock can be accessed online.

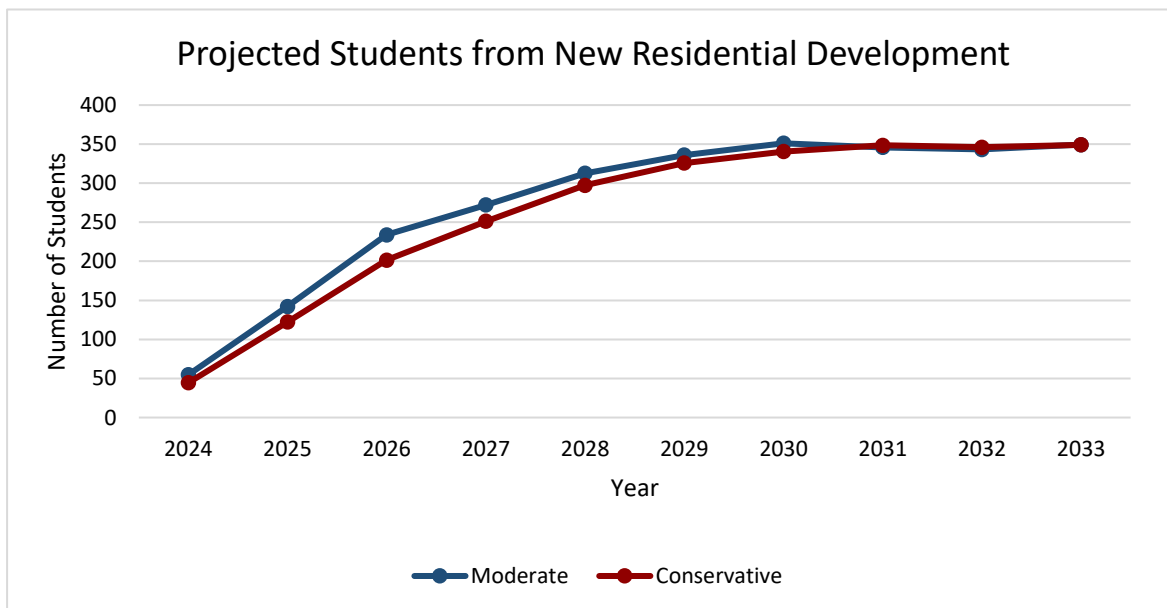


FIGURE 9

ANALYZING/STUDYING/REVIEWING THE RESIDENTIAL DEVELOPMENT RESEARCH REPORT

The projections of district and school enrollment are based on a complex mix of historical data, recent trends, and specific assumptions regarding the future, including new residential development as outlined in this report. At Predictive Enrollment Analytics, we strongly encourage our clients to actively engage with the data with the aim of better understanding, further refining, and using the results to inform decisions about to be made. We believe increased effectiveness for both the district and Predictive Enrollment Analytics comes with increased and welcome dialogue.

Graphs or tables may be copied from the PDF version of this document using the Snapshot Tool inside PDF Reader.

Please do not hesitate to contact Predictive Enrollment Analytics regarding any questions or suggestions that may arise regarding this report.

Respectfully Prepared and Submitted by:

The **Predictive Enrollment Analytics** Team

September 15, 2023

APPENDIX A

STUDENT GENERATION RATE ASSUMPTIONS

Student Generation Rates (Moderate DU Scenario)											
Unit Type	School Level	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
SFD	Elementary	0.33	0.33	0.33	0.33	0.33	0.33	0.33	0.33	0.33	0.33
SFD	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
SFD	High	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.14
SFA	Elementary	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23	0.23
SFA	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
SFA	High	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09
MF	Elementary	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.15
MF	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
MF	High	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10

Student Generation Rates (Conservative DU Scenario)											
Unit Type	School Level	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
SFD	Elementary	0.33	0.33	0.33	0.32	0.32	0.32	0.32	0.32	0.32	0.31
SFD	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
SFD	High	0.14	0.14	0.14	0.14	0.14	0.14	0.14	0.13	0.13	0.13
SFA	Elementary	0.23	0.23	0.23	0.23	0.23	0.22	0.22	0.22	0.22	0.22
SFA	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
SFA	High	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09
MF	Elementary	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.14	0.14	0.14
MF	Middle	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05	0.05
MF	High	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10

- a. Approval of the June 17, 2024 Planning and Transportation Commission Meeting Minutes



San Carlos City Planning and Transportation Commission
Regular Meeting
Council Chambers, City Hall
600 Elm Street, San Carlos, CA 94070
February 3, 2025 7:00 PM

APPROVED MINUTES

1. CALL TO ORDER – Call to order at 7:00 pm
2. ASSEMBLY BILL 2449 TELECONFERENCE REQUESTS - None
3. PLEDGE OF ALLEGIANCE
4. ROLL CALL

Commissioners Present:
Kristen Clements (Chair)
Ellen Garvey (Vice-Chair)
Janet Castaneda
Twisha Anand
Summer Bundy

Staff Present:
Andrea Mardesich, Assistant Community Development Director
Lisa Porras, Planning Manager
Hanieh Houshmandi, Senior Traffic Engineer
Akanksha Chopra, Associate Planner

5. APPROVAL OF MINUTES

MOTION:	Approve the Minutes from the Planning and Transportation Commission Meeting of January 21, 2024.
MOVER:	Janet Castaneda
SECONDER:	Twisha Anand
AYES:	Bundy, Anand, Castaneda, Garvey, Clements
NAYS:	None
ABSENT:	None
RESULT:	Motion Passed 5 – 0 – 0

6. PUBLIC HEARING

- a. 2045 General Plan Reset Public Comment Hearing on the Draft Environmental Impact Report (EIR) and Presentation on Proposed General Plan Amendments.

Akanksha Chopra, Associate Planner, and Steve Noack, Principal at PlaceWorks presented the item and responded to the Commissioners' questions.

The Commissioners provided the following feedback and direction to staff:

- highlight safety actions that serve as mitigation measures. Incorporate fire-safe codes, fuel management, and emergency response into the EIR and summary tables.

- the EIR should address the sewage infrastructure capacity more explicitly. If additional infrastructure is needed for undeveloped areas, the EIR should take that into account.
- highlight the future collaboration with Redwood City on transportation related issues, leveraging the possibility that Redwood City is forming a Transportation Management Association.
- incorporate technological advancements, such as self-driving vehicles, as an assumption in the EIR, as they could help address environmental impacts.
- include an action to evaluate policy approaches for targeting embodied carbon or explicitly incorporating it into the Climate Mitigation Action Plan (CMAP) mitigation measures.
- update the text to reflect the Senate Bill 272 sea level rise adaptation planning requirements and Bay Conservation and Development Commission's (BCDC) December adoption of the Regional Shoreline Adaptation Plan (RSAP). Additionally, consider including an action related to participating in a multi-jurisdictional RSAP to ensure a coordinated regional approach.
- consider the jobs-housing balance as the City adopts new capacity figures to ensure sustainable growth. Even if neighboring jurisdictions do not follow the same approach, the City's numbers should accurately reflect their commitment to balanced development

Public Comment – None

MOTION:	Close Public Hearing
MOVER:	Ellen Garvey
SECONDER:	Janet Castaneda
AYES:	Bundy, Anand, Castaneda, Garvey, Clements
NAYS:	None
ABSENT:	None
RESULT:	Motion Passed 5 – 0 – 0

7. REPORTS, CORRESPONDENCE AND GENERAL INFORMATION

a. Report on Recent City Council Actions - None

b. Planning and Transportation Commission comments or reports

Commissioner Castaneda shared that she attended the **Community Corner Open House** on **January 30**, which was well attended and showcased various projects the City is currently working on.

c. Correspondence – None

d. Planning Staff comments, reports, and updates on current projects

Andrea Mardesich provided the following updates.

- At the next Planning and Transportation Commission (PTC) meeting there will be a review of the Pulgas Creek Watershed plan presented by Public Works.

- Design options of the 700 block Laurel as well as Harrington Park will be presented to the City Council on February 10, where they will make a final selection.
- In March, the PTC will be reviewing the Streetscape Master Plan for the Downtown and be considered by the Commission for the recommendation to the City Council.
- The January 30 Open House, hosted by the Planning Department, was well attended and covered many Advance Planning topics. It provided a valuable opportunity to connect with the community.

8. PUBLIC COMMENTS – None

9. ADJOURNMENT – The meeting was adjourned at 8:24 pm



Andrea Mardesich, Assistant
Community Development Director



San Carlos City Planning and Transportation Commission
Regular Meeting
Council Chambers, City Hall
600 Elm Street, San Carlos, CA 94070
June 17, 2024 7:00 PM

APPROVED MINUTES

1. CALL TO ORDER – Call to order at 7:00 pm
2. ASSEMBLY BILL 2449 TELECONFERENCE REQUESTS - None
3. PLEDGE OF ALLEGIANCE

4. ROLL CALL

Commissioners Present:

Ellen Garvey (Acting Chair)
Janet Castaneda
David Roof

Commissioners Absent

Jim Iacoponi, Chair
Kristen Clements, Vice Chair

Staff Present:

Andrea Mardesich, Assistant Community Development Director
Lisa Porras, Planning Manager
Rucha Dande, Principal Planner
Akanksha Chopra, Associate Planner
Lisa Costa Sanders, Consultant Principal Planner
Greg Rubens, City Attorney

5. APPROVAL OF MINUTES

- a Approval of the June 3, 2024 Planning and Transportation Commission (PTC) Meeting Minutes.

MOTION:	Approve the Minutes from the Planning and Transportation Commission Meeting of June 3, 2024.
MOVER:	Ellen Garvey
SECONDER:	Janet Castaneda
AYES:	Roof, Garvey, Castaneda
NAYS:	None
ABSENT:	Kristen Clements, Jim Iacoponi
RESULT:	Motion Passed 3 – 0 – 2

6. PUBLIC HEARING

- a. 642 Quarry Road (APN:046-041-038) – Public Hearing to Consider approving the Design Review Modification, to modify the design of an approved but not yet built life science research and development buildings.

Lisa Costa Sanders, Consultant Principal Planner and Applicant Rex Crabb from OTJ Architects presented the item.

Commissioners asked clarifying questions.

City staff and Consultant Team addressed the Commission's inquiries.

Public Comment

Nels Delander (in-person), representative of Carpenters Local 217, emphasized that workers on this project should receive fair wages, proper training through apprenticeships, and healthcare benefits.

Debbie Baldocchi (via Zoom), a San Carlos resident, sought the Commissioners' perspectives on the parking lot structure before and after the proposed design changes.

MOTION:	Close Public Comment
MOVER:	Janet Castaneda
SECONDER:	David Roof
AYES:	Roof, Castaneda, Garvey
NAYS:	None
ABSENT:	Kristen Clements, Jim Iacoponi
RESULT:	Motion Passed 3 – 0 – 2

Commission Comment

Commissioner Garvey invited the applicant to respond to the caller's question regarding the art wall on parking lot structure.

The Commission was supportive of the design changes and liked the simplified design and planter boxes.

MOTION:	Approve the request for Design Review Modification, for the construction of construction of two research and development life science buildings, one 215,022 square feet and one 192,650 square feet, (both buildings with six floors), and one parking garage with nine floors above grade and one subsurface level at 642 Quarry Road based on the findings and for the reasons incorporated in the staff report and subsequent attachments.
MOVER:	David Roof
SECONDER:	Janet Castaneda
AYES:	Roof, Castaneda, Garvey
NAYS:	None
ABSENT:	Kristen Clements, Jim Iacoponi
RESULT:	Motion Passed 3 – 0 – 2

Commissioner Garvey stated that The Planning and Transportation Commission's action will be final unless appealed to the City Council within 10 days of the date of action. The deadline to file an appeal is 5:00 p.m. on Thursday, June 27, 2024.

- b. Scoping Meeting for the 2045 General Plan Reset Environmental Impact Report (EIR).

Akanksha Chopra, Associate Planner and Terri McCracken, Consultant Associate Principal from PlaceWorks presented the item.

Public Comment

Debbie Baldocchi (via Zoom) expressed her concerns about the numerous life science developments and requested that the EIR address hazardous materials, including biohazards, water quality and soil. She emphasized the need for the City to consider the energy and water usage and the risks associated with the concentrated use of biosafety labs.

MOTION:	Close Public Comment
MOVER:	Ellen Garvey
SECONDER:	Janet Castaneda
AYES:	Roof, Castaneda, Garvey
NAYS:	None
ABSENT:	Kristen Clements, Jim Iacoponi
RESULT:	Motion Passed 3 – 0 – 2

Greg Rubens clarified that the public comment period was for the evening only. He stated that there is still the public comment period for the scoping of the EIR and the public still has the opportunity to communicate with staff and provide input.

Commissioners asked clarifying questions.

Commissioner Garvey requested that the EIR thoroughly evaluate developments near creeks, especially in the Northeast area.

Commissioner Roof emphasized the need for review of wildfire related impacts with respect to potential congestion and evacuation from potential new development in San Carlos.

City staff and consultant addressed the Commission's inquiries.

7. NEW BUSINESS

- a. Consider Authorizing a Planning and Transportation Commission Summer Recess and Cancellation of the July 1, 2024 and July 15, 2024 Regular Meetings.

Public Comment

Debbie Baldocchi (via Zoom) thanked the Commission for their hard work throughout the year and supported the motion.

MOTION:	Approve a summer recess and authorizes cancellation of the July 1, 2024 and July 15, 2024 Regular Meetings.
MOVER:	Janet Castaneda
SECONDER:	Ellen Garvey
AYES:	Roof, Castaneda, Garvey
NAYS:	None
ABSENT:	Kristen Clements, Jim Iacoponi
RESULT:	Motion Passed 3 – 0 – 2

8. STUDY SESSION

- a. Study Session on Objective Design Standards for Multifamily (RM) and Mixed use (MU) Development Types.

Rucha Dande, Principal Planner and Rick Williams, Consultant Principal Architect and Urban Designer from Van Meter Williams Pollack presented the item.

Public Comment

Debbie Baldocchi (via Zoom) commented that the Multi-family Objective Design Standards process seems to be undoing the height restrictions, setbacks, and step backs established for single-family homes in the Housing Element. She urged City Staff to be meticulous when making required findings, particularly concerning sites with pre-existing restrictions, such as 1785 San Carlos Avenue due to its proximity to the creek.

Debbie Baldocchi also mentioned that the Greater East Side San Carlos neighborhood spoke in great numbers about step backs and setbacks for multifamily buildings facing their single-family homes. She asked if all their input would be disregarded and replaced by new standards that are less favorable to single-family homeowners.

Lisa Porras, Planning Manager addressed the public comment on the Housing Element.

Rick Williams followed up on the public comment

Commission Comment

Commissioners asked clarifying questions.

Commissioner Roof emphasized the need for proposed changes and implications to be openly discussed with the public.

Commissioner Garvey echoed Commissioner Roof's comment, stating the importance of making information available to the community for review and comment. She emphasized the need to invite the community to stay engaged with the subject through various outreach tools.

Commissioner Castaneda mentioned that while the market suggests a demand for larger units, there is also a trend in many areas towards smaller units. She urged City Staff to keep this in mind.

City staff and consultant addressed the Commission's inquiries.

9. REPORTS, CORRESPONDENCE AND GENERAL INFORMATION

a. Report on Recent City Council Actions

Andrea Mardesich, Assistant Community Development Director shared that the City Council provided feedback to staff on the Downtown Streetscape Plan and authorized to move forward with some technical studies. She also shared that the Council approved the mid-year budget.

b. Planning and Transportation Commission comments or reports

Commissioner Garvey noted that the evening was Commissioner Roof's last meeting and thanked him for his service.

c. Correspondence - None

d. Planning Staff comments, reports, and updates on current projects

Andrea Mardesich provided the following updates.

- There will be no meetings in July.
- Staff is determining if there is a quorum for the August 5, Planning and Transportation Commission (PTC) meeting.
- Thanked Commissioner Roof for his 6 years of service in PTC and Residential Design Review Committee.

10. PUBLIC COMMENTS

Debbie Baldocchi (via Zoom) thanked Commissioner Roof for representing the community.

11. ADJOURNMENT – The meeting was adjourned at 9:31 pm



Andrea Mardesich, Assistant
Community Development Director



**San Carlos City Council/Successor Agency to the
Redevelopment Agency/Housing Authority Regular Meeting
Council Chambers, City Hall
600 Elm Street, San Carlos, CA 94070
February 24, 2025 7:00 PM**

MINUTES

ROLL CALL

City Council Present: Sara McDowell, Mayor
Pranita Venkatesh, Vice Mayor
John Dugan, Councilmember
Adam Rak, Councilmember
Neil Layton, Councilmember

Staff Present: Nil Blackburn, Assistant City Manager
Akanksha Chopra, Associate Planner
Lisa Costa Sanders, Principal Planner Consultant
Paul Harris, Financial Services Manager
Hanieh Houshmandi, Senior Traffic Engineer
Steven Machida, Public Works Director
Jeff Maltbie, City Manager
Caitlyn Matoso, Recreation Supervisor
Tyler Muela, Recreation Supervisor
Crystal Mui, City Clerk
Amy Newby, Parks and Recreation Director
Lisa Porras, Planning Manager
Gregory Rubens, City Attorney
Al Savay, Community Development Director

1. CALL TO ORDER

Mayor McDowell called the meeting to order at 7:00 PM.

2. ASSEMBLY BILL 2449 TELECONFERENCE REQUESTS

None.

3. PLEDGE OF ALLEGIANCE

Mayor McDowell led the Pledge of Allegiance.

4. CHANGES TO THE ORDER OF THE AGENDA

None.

5. PRESENTATIONS

- a. Present a Proclamation Recognizing February 2025 as Black History Month.

Mayor McDowell presented a proclamation to Patti Brown, President of the Friends of the San Carlos Adult Community Center, in recognition of February as Black History Month.

Ms. Brown, thanked the Council for formally recognizing the significance of Black History Month.

6. COUNCIL COMMUNICATIONS AND ANNOUNCEMENTS

Councilmember Rak reported attending the City's Volunteer Recognition Dinner and expressed appreciation to the Parks and Recreation Department for organizing the event.

Councilmember Dugan provided an update from the recent County Emergency Services Council meeting, noting the adoption of a charter amendment and rebranding efforts.

Mayor McDowell reported attending the Volunteer Recognition Dinner and the Friends of the Adult Community Center's Crab Feed and participating in the Centennial StoryCorps interviews.

7. PUBLIC COMMENT

None.

8. CONSENT CALENDAR

MOTION:	Adopt City Council Consent Calendar items 'a' through 'k'.
MOVER:	Rak
SECONDER:	Layton
AYES:	Dugan, Layton, Rak, Venkatesh, McDowell
NAYS:	None
RESULT:	Motion Passed 5 – 0

- a. Motion to Waive Reading of All Ordinances.
- b. Approve the January 27, 2025 City Council Regular Meeting Minutes.
- c. Accept the Fiscal Year (FY) 2024-25 Second Quarter Financial Report for the Period Ending December 31, 2024.
- d. Accept the Fiscal Year (FY) 2024-25 Second Quarter Investment Report for the Period Ending December 31, 2024.
- e. Adopt a Resolution Appropriating an Additional \$150,000 from the General Capital Fund (Fund 25) Unassigned Fund Balance in Fiscal Year (FY) 2024-25 to the Traffic Signal Master Plan Implementation Project C2405. **Resolution 2025-010**
- f. Adopt a Resolution Approving the Specifications for the Corporation Yard and Library Roof Replacement Projects and Authorizing a Call for Bids. **Resolution 2025-011**
- g. Adopt a Resolution Awarding the Illuminated Street Name Sign Replacement Project C1712, Authorizing the City Manager to Execute an Agreement with Bear Electrical Solutions, LLC in the Amount of \$95,975, and Authorizing the Expenditure of a 10% Contingency in the Amount of \$9,600. **Resolution 2025-012**

- h. Adopt a Resolution Accepting the Big Canyon Park Landslide Project Behind 3144 Brittan Avenue C2319 and Authorizing the Public Works Director to Issue and Record a Notice of Completion. **Resolution 2025-013**
- i. Adopt a Resolution Accepting the Big Canyon Park Landslide Project Behind 3141-61 Melendy Drive C2320 and Authorizing the Public Works Director to Issue and Record a Notice of Completion. **Resolution 2025-014**
- j. Adopt a Resolution Accepting a Proposed Expanded Easement at 1005 Drake Court. **Resolution 2025-015**
- k. Adopt a Resolution Appointing Ron Collins as the City of San Carlos Representative to the San Carlos Development Corporation (the Elms) Board of Directors. **Resolution 2025-016**

9. STUDY SESSION

- a. Receive a Presentation and Provide Direction on the Parks and Recreation Master Plan.

Amy Newby, Parks and Recreation Director, introduced the item and turned the presentation over to Melonie Reynolds, Associate Principal Consultant with Gates + Associates, who provided an overview of their outreach efforts and findings.

The Council shared the following priorities for the Parks and Recreation Master Plan:

- Incorporate multigenerational programming and spaces
- Identify and implement short-term improvements
- Honor the city's history through park elements
- Include a theater as part of the community center
- Introduce unique, site-specific features at each park (such as stargazing platform at North Crestview Park)
- Enhance and expand existing parks and facilities to meet identified goals
- Establish and expand on centralized gathering points within parks to foster community engagement
- Design versatile spaces that accommodate multiple uses
- Consider developing a recreational pool within an existing facility to provide aquatic opportunities for all ages
- Ensure parks offer amenities and experiences for everyone

Ms. Reynolds responded to Council questions and then turned the presentation over to Susi Marzuola, Principal Consultant with Siegel & Strain, to present on the City's existing recreational facilities.

The Council provided additional feedback on existing facilities:

- Explore creative ways to maximize the use of current facilities
- Pursue strategic partnerships with schools and community organizations
- Consider potential enhancements at Laureola Park, as its proximity to commercial areas allows for improvements with minimal impact on the surrounding neighborhood
- Ensure walkability is a key consideration for facility accessibility
- Prioritize City Hall Dog Park as a central civic gathering space

The Council recessed at 8:10 PM and reconvened at 8:16 PM.

- b. Receive a Presentation and Provide Direction on the Draft Environmental Impact Report (EIR) and General Plan Amendments for the 2045 General Plan Reset.

Associate Planner Akanksha Chopra presented on the proposed amendments to the City's General Plan and turned the presentation over to Steve Noack, Principal from Placeworks, to present the Draft Environmental Impact Report (EIR).

Mr. Noack, Alexis Mena - Associate Principal Consultant with RSG, Brandon Fender - Senior Associate Consultant with RSG, Ms. Chopra, City Manager Jeff Maltbie, City Attorney Greg Rubens and Community Development Director Al Savay responded to Council questions.

The Council provided the following feedback to staff:

- Provide the rationale on why the reduced buildout scenario is not recommended
- Include a breakdown of how the Northeast Area and Downtown Specific Plans filtered into the development projections
- Include the net change from existing conditions to the 2030 General Plan

10. AGENDA SETTING

None.

11. ADJOURNMENT

Mayor McDowell honored former San Carlos Mayor and Councilmember Sylvia Nelson's contributions to the community and adjourned the meeting at 9:38 PM in her memory.



Crystal Mui,
City Clerk

2045 San Carlos General Plan Reset

Economic Development Advisory Commission (EDAC) Meeting

October 22, 2024 4:00 PM

Questions and Comments

- What do the numbers represent? A target for the City?
 - Answer provided: We are planning for capacity, and making sure that the General Plan and EIR are analyzing a certain umbrella that exceeds the market demand projections that have been prepared for the City.
- Why is the future residents-per-housing-unit number lower than in existing conditions?
 - Answer provided: The existing conditions include a lot of single-family development, whereas nearly all net new housing is anticipated to be multi-family development, which has a smaller household size.
- What does non-residential square footage include?
 - Answer provided: This includes everything considered “commercial” or non-public, including retail, office, industrial/light industrial, and research and development (R&D)/life sciences.

Stakeholder Meeting - 2045 San Carlos General Plan Reset

Agency Stakeholder Meeting

October 29th, 2024, 2:00 PM

Agencies:

San Carlos School District

C/CAG and Airport Land Use Commission

San Mateo County Transit District

MidPen Water District

CalWater

Questions and Comments

- SamTrans owns the building on Laurel & San Carlos Avenue (SamTrans HQ) and will be moving to a new building in Millbrae. They have been in touch Lisa and Andrea at the City about future plans for developing that space. Should any major changes be anticipated?
 - Answers provided: Land uses changes will be part of the Downtown Specific Plan and not the General Plan Reset. There are no transportation changes through the General Plan Reset but the Downtown Specific Plan includes streetscape changes; not sure if they also include any policies/program for transit providers.
- The Mid-Peninsula Water District (MidPen) is starting to look at updates from the State that ban watering of non-functional turf in 2027. Non-functional turf will likely include medians and MidPen will be creating an ordinance to prevent watering of those areas. The Downtown Specific Plan streetscape provisions may need to be aware of this.
 - Answers provided: These specific plans and the General Plan Reset do not get to that level of detail but it is good to be aware of this upcoming change. The Parks Master Plan is also underway and they will be made aware of this.
- MidPen will be starting the 2025 UWMP update by July 2026
 - Answer provided: The General Plan Reset will cite this in the EIR.

Stakeholder Meeting - 2045 San Carlos General Plan Reset

Economic Interest & Community Based Organizations

October 30, 2024, 6:30 – 7 :30 PM

Chamber San Mateo County

HIA (Harbor Industrial Association)

IABA (Industrial Arts Business Association)

Rotary Club of San Carlos

San Carlos Lions Club

San Carlos Community Foundation

Questions and Comments

- The population growth seems high, is that all from Northeast Area?
 - Answers provided: This includes the Northeast Area but also includes other areas in the city. The 6th cycle RHNA was used as basis for the projection. This is probably an aggressive number but since we are planning for capacity we want to be conservative. This is not a target, but rather a calculation for analysis and planning.
- The job numbers also seem high – is this through non-residential growth coming from the Northeast Area?
 - Answer provided: Yes, this is largely coming from the Northeast Area Specific Plan (NEASP), life sciences and research and development.
- This will change the nature of the community, the population/size of San Carlos has been stable for a long time.
- How housing in NEASP would accommodate people's social needs and gathering places. Are there plans for gathering spaces in the NEASP area?
 - Answer provided: Housing would be mainly multi-family residential, but we have a ratio of required open space. There is interest in one larger space rather than lots of small spaces. There is a community meeting on November 7th for the NEASP.
- People in certain demographics are locked into their homes because there is no space for seniors.
 - Answer provided: The City can't direct that housing be for seniors, but Pacific Hacienda ended up attracting people in that demographic, and Wheeler Plaza did the same thing.