

**Final**

SCH: 2024060037 | April 2025

# 2045 General Plan Reset Final EIR

for the City of San Carlos





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**Prepared by: PlaceWorks**

2040 Bancroft Way, Suite 400  
Berkeley, California 94704  
t 510.848.3815

**In Association With:**

Kittleson and Associates  
RSG  
W-Trans



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# 1. Executive Summary

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This Final Environmental Impact Report (EIR) has been prepared to provide an assessment of the potential environmental consequences of approving and implementing the proposed 2045 General Plan Reset, hereinafter referred to together as “proposed project.” This EIR has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21000, et seq.) and the CEQA Guidelines (Title 14 of the California Code of Regulations, Division 6, Chapter 3, Section 15000, et seq.) to determine if approval of the identified discretionary actions and related subsequent development could have a significant impact on the environment. This executive summary includes the conclusions of the environmental analysis contained in the Draft EIR and presents a summary of impacts and mitigation measures identified. The remainder of this Final EIR contains corrections and clarifications to the text and analysis of the Draft EIR, where warranted, along with a response to comments matrix and a list of commenters. For a complete description of the proposed project, see Chapter 3, *Project Description*, of the Draft EIR. For a complete discussion of alternatives to the proposed project, see Chapter 5, *Alternatives*, of the Draft EIR.

## 1.1 REPORT ORGANIZATION

This Final EIR is organized into the following chapters:

- **Chapter 1: Executive Summary.** Summarizes environmental consequences that would result from implementation of the project, recommended mitigation measures, and the level of significance of environmental impacts before and after mitigation. Underline text in Table 1-1, *Summary of Significant Impacts and Mitigation Measures*, represents language that has been added to the impacts and mitigation measures in the EIR; text in ~~strikethrough~~ has been deleted from the EIR.
- **Chapter 2: Introduction.** Provides an overview describing the use and organization of this Final EIR.
- **Chapter 3: Revisions to the Draft EIR.** Contains corrections to the text and graphics of the Draft EIR. Underline text represents language that has been added to the EIR; text in ~~strikethrough~~ has been deleted from the EIR.
- **Chapter 4: List of Commenters.** Lists the names of agencies, organizations, and individuals who commented on the Draft EIR.
- **Chapter 5: Comments and Responses.** Presents comments received from agencies and the public on the Draft EIR alongside responses to each comment.
- **Appendix:** The appendix for this Final EIR contains the following:
  - **Appendix E:** Revised Proposed General Plan Amendments
  - **Appendix F:** Comments Received on the Draft EIR

## EXECUTIVE SUMMARY

Appendices A through D are located within the Draft EIR and have not been revised. All appendices are available on the City's webpage for the proposed project.

The Draft EIR is available online and incorporated here by reference. It constitutes part of the Final EIR.

### 1.2 SUMMARY OF THE PROPOSED PROJECT

The proposed project would update the San Carlos 2030 General Plan to amend the future development projections.

The existing buildout capacity of General Plan 2030 would be amended and development projections for 2045 would be incorporated, thus moving the planning horizon forward by 15 years. Additionally, narrative text and specific policies and actions would be updated along with topics that are now required by State mandate or recent Citywide plans or regulations. Chapter 3, *Project Description*, of the Draft EIR includes a detailed description of the proposed project.

### 1.3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

As determined in the Draft EIR, the proposed project has the potential to generate significant environmental impacts in a number of areas. Pursuant to Section 15126.2(b) of the CEQA Guidelines, an EIR must describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As shown in Table 1-1, *Summary of Significant Impacts and Mitigation Measures*, all significant impacts would remain significant and unavoidable, even with adoption and implementation of the mitigation measures identified in the Draft EIR. As described in detail in Chapter 6, *CEQA-Required Assessment Conclusions*, of the Draft EIR, the proposed project would have no significant impact on agricultural and forestry resources or mineral resources, due to existing conditions in the project area. Accordingly, these topics were not analyzed further in the Draft EIR.

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft EIR and presents a summary of the significant impacts and mitigation measures identified. It is organized to correspond with the environmental issues discussed in Chapters 4.1 through 4.18 of the Draft EIR. The table is arranged in four columns: (1) significant environmental impacts, (2) significance without mitigation, (3) mitigation measures, and (4) significance with mitigation. For a complete description of the proposed project's potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.18.



## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
<b>AESTHETICS</b>			
<i>No significant impacts</i>			
<b>AIR QUALITY</b>			
<b>AQ-2.1:</b> Construction of development projects within the buildout horizon of the proposed project would generate emissions that <del>would could</del> exceed the Bay Area Air Quality Management District's (BAAQMD <del>Air District</del> ) regional significance thresholds and cumulative contribute to the nonattainment designations of the San Francisco Bay Area Air Basin.	<b>S</b>	<p><b>AQ-2.1:</b> Prior to discretionary approval by the City for development projects subject to CEQA (California Environmental Quality Act) review (i.e., discretionary, nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project construction-related air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with current BAAQMD <del>Air District</del> methodology for assessing air quality impacts identified in BAAQMD's <del>the Air District's</del> CEQA Air Quality Guidelines. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD <del>District</del>-adopted thresholds of significance, the City shall require feasible mitigation measures to reduce air quality emissions. Measures shall require implementation of current BAAQMD <del>Air District</del> Best Management Practices for construction-related fugitive dust emissions. At the time of preparation of this EIR, such practices include:</p> <ul style="list-style-type: none"> <li>Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) at least twice daily or as often as needed to control dust emissions.</li> <li>All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day.</li> <li>All vehicle speeds on unpaved roads shall be limited to 15 mph.</li> <li>All roadways, driveways, sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seedling or soil binders are used.</li> <li>All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</li> <li>All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</li> </ul>	<b>SU</b>

S = Significant; SU = Significant and Unavoidable

## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
		<ul style="list-style-type: none"> <li>Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compact layer of wood chips, mulch, or gravel.</li> <li>Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The <del>BAAQMD Air District</del> phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul> <p>Measures shall be incorporated into appropriate construction documents (e.g., construction management plans) and shall be verified by the City.</p>	
<b>AQ-2.2:</b> Operation of development projects under the proposed project could generate operational emissions that exceed the Bay Area Air Quality Management District's ( <del>BAAQMD Air District</del> ) regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO <sub>x</sub> ).	<b>S</b>	<p><b>AQ-2.2:</b> Prior to discretionary approval by the City for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), future project applicants shall prepare and submit a technical assessment evaluating potential project operational air quality impacts to the City for review and approval. The evaluation shall be prepared in conformance with <del>BAAQMD Air District</del> methodology in assessing air quality impacts identified in <del>BAAQMD's the Air District's</del> current CEQA Air Quality Guidelines at the time that the project is considered.</p> <p>If operation-related air pollutants are determined to have the potential to exceed the <del>BAAQMD District</del>-adopted thresholds of significance, the City shall require the project applicant(s) to incorporate mitigation measures to reduce air pollutant emissions <u>to comply with applicable significance threshold standards</u> during operational activities. The identified measures shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA review. Possible mitigation measures to reduce long-term emissions could include, but are not limited to the following:</p> <ul style="list-style-type: none"> <li>Implementing commute trip reduction programs.</li> <li>Unbundling residential parking costs from property costs.</li> <li>Expanding bikeway networks.</li> <li>Expanding transit network coverage or hours.</li> <li>Using cleaner-fueled vehicles.</li> <li>Exceeding the current Title 24 Building Envelope Energy Efficiency Standards.</li> </ul>	<b>SU</b>

S = Significant; SU = Significant and Unavoidable

## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
		<ul style="list-style-type: none"> <li>Establishing on-site renewable energy generation systems.</li> <li>Requiring all-electric buildings.</li> <li>Replacing gas-powered landscaping equipment with zero-emission alternatives.</li> <li>Implementing organics diversion programs.</li> <li>Expanding urban tree planting.</li> </ul>	
<b>AQ-3:</b> Construction emissions associated with future development projects could expose air quality-sensitive receptors to substantial toxic air contaminant concentrations and exceed the Bay Area Air Quality Management District's (BAAQMD Air District) project-level and cumulative significance thresholds.	<b>S</b>	<p><b>AQ-3:</b> Prior to discretionary approval by the City, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or Overburdened Community, as measured from the property line of the project site to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and BAAQMD the Air District. If the HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM2.5 exceeds the respective threshold, as established by BAAQMD the Air District (all areas of the City and Sphere of Influence), the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM2.5 to an acceptable level. T-BACTs may include but are not limited to:</p> <ul style="list-style-type: none"> <li>Restricting idling on-site beyond Air Toxic Control Measures idling restrictions</li> <li>Electrifying warehousing docks</li> <li>Requiring use of newer equipment</li> <li>Requiring near-zero or zero-emission trucks for a portion of the vehicle fleet based on opening year.</li> <li>Truck Electric Vehicle (EV) Capable trailer spaces.</li> <li>Restricting off-site truck travel through the creation of truck routes.</li> </ul>	<b>SU</b>

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## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
		T-BACTs identified in the HRA shall be included as part of the conditions of approval or a mitigation monitoring and reporting plan adopted for the project as part of the project CEQA (California Environmental Quality Act) review.	
<b>BIOLOGICAL RESOURCES</b>			
<i>No significant impacts</i>			
<b>CULTURAL RESOURCES</b>			
<i>No significant impacts</i>			
<b>ENERGY</b>			
<i>No significant impacts</i>			
<b>GEOLOGY AND SOILS</b>			
<i>No significant impacts</i>			
<b>GREENHOUSE GAS EMISSIONS</b>			
<b>GHG-1:</b> Implementation of the proposed project <del>would</del> <u>could</u> exceed the greenhouse (GHG) emissions threshold of no net increase from existing conditions and would therefore not make substantial progress toward the long-term GHG reduction goal under Senate Bill (SB) 32 or the carbon neutrality goal under Assembly Bill (AB) 1279.	<b>S</b>	<p><b>GHG-1:</b> The City of San Carlos shall prepare an update to its Climate Mitigation and Adaptation Plan (CMAP) to chart a trajectory to achieve the long-term GHG reduction goal set by AB 1279. The updated CMAP shall be completed within three years of certification of the General Plan EIR. The updated CMAP shall be updated every five years to ensure the City is monitoring the CMAP's progress toward achieving the City's GHG reduction target(s), and the City shall amend the CMAP if it is not achieving such targets. The CMAP update shall consider a trajectory consistent with the GHG emissions reduction goal established under AB 1279 for year 2045, and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CMAP update.</p> <p>The CMAP update shall include the following:</p> <ul style="list-style-type: none"> <li>■ GHG inventories of existing and forecast year GHG levels.</li> <li>■ Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal and carbon neutrality goal for year 2045 of AB 1279.</li> <li>■ Plan implementation guidance that includes, at minimum, the following components consistent with the CMAP update:</li> </ul>	<b>SU</b>

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## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
		<ul style="list-style-type: none"> <li>Administration and Staffing</li> <li>Finance and Budgeting</li> <li>Timelines for Measure Implementation</li> <li>Community Outreach and Education</li> <li>Monitoring, Reporting, and Adaptive Management</li> <li>Tracking Tools</li> </ul>	
<b>HAZARDS AND HAZARDOUS MATERIALS</b>			
<i>No significant impacts</i>			
<b>HYDROLOGY AND WATER QUALITY</b>			
<i>No significant impacts</i>			
<b>LAND USE AND PLANNING</b>			
<i>No significant impacts</i>			
<b>NOISE</b>			
<i>No significant impacts</i>			
<b>PARKS AND RECREATION</b>			
<i>No significant impacts</i>			
<b>POPULATION AND HOUSING</b>			
<i>No significant impacts</i>			
<b>PUBLIC SERVICES</b>			
<i>No significant impacts</i>			
<b>TRANSPORTATION</b>			
<b>TRAN-2:</b> The proposed project could exceed the City's VMT significance criteria by generating VMT per service, per capita, and per employee that exceeds a threshold of 15 percent less than the regional average and by increasing total countywide VMT.	<b>S</b>	<b>TRAN-2:</b> The City of San Carlos shall amend its Transportation Demand Management program (San Carlos Municipal Code Chapter 18.25, <i>Transportation Demand Management</i> ) to increase the required trip reduction to the extent feasible.	<b>SU</b>

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## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES**

Environmental Impact	Significance without Mitigation	Mitigation Measures	Significance with Mitigation
<b>TRIBAL CULTURAL RESOURCES</b>			
<i>No significant impacts</i>			
<b>UTILITIES AND SERVICE SYSTEMS</b>			
<i>No significant impacts</i>			
<b>WILDFIRE</b>			
<b>WILD-2:</b> Future development during the buildout horizon of the proposed project could increase population, buildings, and infrastructure in wildfire-prone areas, thereby exacerbating wildfire risks.	<b>S</b>	None available.	<b>SU</b>
<b>WILD-5:</b> Future development during the buildout horizon of the proposed project could, in combination with other surrounding and future projects in the State Responsibility Areas, Very High Fire Hazard Severity Zones (FHSZ), or Wildland-Urban Interface (WUI), result in cumulative impacts associated with the exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors.	<b>S</b>	None available.	<b>SU</b>

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## 2. Introduction

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Pursuant to the California Environmental Quality Act (CEQA) Guidelines, Chapter 14, California Code of Regulations, Section 15378[a], the proposed 2045 General Plan Reset is considered a “project” subject to environmental review. The implementation is “an action [undertaken by a public agency] which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment.” The assessment in this Final Environmental Impact Report (EIR) is intended to inform the City’s decision-makers, other responsible agencies, and the public-at-large of the nature of the proposed project and its effect on the environment.

### 2.1 DRAFT EIR

Pursuant to Public Resources Code Section 21080(d)<sup>1</sup> and CEQA Guidelines Section 15063,<sup>2</sup> the City determined that the proposed project could result in potentially significant environmental impacts and that an EIR would be required. In compliance with CEQA Section 21080.4, the City circulated the Notice of Preparation (NOP) of an EIR for the proposed project to the Office of Land Use and Climate Innovation (formerly known as Office of Planning and Research) State Clearinghouse and interested agencies and persons on June 3, 2024, for a 30-day review period. The scoping period for this Draft EIR was between June 3 and July 3, 2024, during which interested agencies and the public could submit comments about the proposed project. The scope of the Draft EIR was established by the City of San Carlos through the EIR scoping process and includes an analysis of both the proposed project’s impacts and cumulative impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Parks and Recreation
- Population and Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- CEQA-Mandated Assessment Conclusions:
  - Significant Unavoidable Impacts
  - Impacts Found Not to Be Significant
  - Growth Inducement
  - Significant and Irreversible Changes

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<sup>1</sup> The CEQA Statute is found at California Public Resources Code, Division 13, Sections 21000 to 21177.

<sup>2</sup> The CEQA Guidelines are found at California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 to 15387.

## INTRODUCTION

The Draft EIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on January 17, 2025, and ending March 3, 2025. During the comment period, the public was invited to submit written comments on the Draft EIR via mail or e-mail to the City of San Mateo Community Development Department. Additionally, on February 3, 2025, a Public Hearing for the Draft EIR was held where public comments were received.

## 2.2 FINAL EIR

Upon completion of the 45-day review period for the Draft EIR, the City reviewed all comments received and prepared written responses for each comment. These letters are included in Appendix F, *Comments Received on the Draft EIR*, of this Final EIR. This Final EIR includes written responses for each comment received during the public review period. This Final EIR consists of the Draft EIR, the comments received on the Draft EIR, and the responses to those comments, and describes any changes to the Draft EIR that have resulted from the comments received.

Upon recommendations by the Planning and Transportation Commission at a public hearing, the City Council will review the Final EIR as the decision-making body for the proposed project. A City Council public hearing will be scheduled to concurrently consider certification of the Final EIR and a decision on the project. If the City Council determines that the project may be approved, the City Council will adopt and incorporate into the project all feasible mitigation measures identified in the EIR and may also require changes to the proposed project.

For impacts for which the City Council finds that certain mitigation measures are outside the jurisdiction of the City to implement, or for which there are no feasible mitigation measures, the City Council would have to adopt a statement of overriding considerations that determines that economic, legal, social, technological, or other benefits of the proposed project outweigh the unavoidable, significant effects on the environment.

The City Council may also find that the project does not satisfy the required findings for approval and decide to reject the project on that basis. Community input is encouraged at all Planning and Transportation Commission and City Council public hearings.

## 2.3 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that the lead agency adopt a monitoring or reporting program for any project for which it has made mitigation findings pursuant to Public Resources Code 21081. Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR. The Mitigation Monitoring and Reporting Program for the proposed project will be completed and available to the public prior to certification of this EIR.



### 3. Revisions to the Draft EIR

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This chapter presents changes to the Draft Environmental Impact Report (EIR) that resulted from preparation of responses to comments, or from staff-directed changes, including corrections and clarifications. In each case, the page and location on the page in the Draft EIR is presented, followed by the text or graphic revision. Underlined text represents language that has been added to the EIR; text with ~~striethrough~~ has been deleted from the EIR. The revisions in this chapter do not require recirculation of the Draft EIR because they do not constitute “significant new information” under Section 15088.5 of the California Environmental Quality Act (CEQA) Guidelines. All changes to Draft EIR Table 1-1, *Summary of Impacts and Mitigation Measures*, are included in Chapter 1, *Executive Summary*, of this Final EIR.

## REVISIONS TO PROPOSED GENERAL PLAN POLICIES

The following General Plan policy and actions in the proposed 2045 General Plan Reset is hereby amended as follows; this is a global revision to the Draft EIR:

- **Action LU-6.5:** Continue to implement the East Side Innovation District Vision Plan adopted on October 25, 2021 (Resolution 2021-107).
- **Policy EM-1.1:** Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications through the preparation of a biological resources assessment by a qualified biologist. Require such biological resource assessments as part of project approval for proposed development on sites that may support special-status plant and animal species, sensitive natural communities, important wildlife corridors, riparian habitat, or regulated wetlands and waters.
- **Action EM-1.5:** Require that ~~major~~ new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes.
- **Action EM-7.3:** Update the Climate Action Plan (CAP) every five years, including but not limited to:
  - a. A revised greenhouse gas (GHG) emissions inventory;
  - b. An overview of new knowledge of the causes and anticipated impacts of climate change;
  - c. Collaborate with stakeholders and volunteers to assist in the preparation and implementation of the effective CAP.
  - d. An assessment of the appropriateness and adequacy of San Carlos’ GHG reduction target;
  - e. A summary of the quantified cost per metric ton of carbon dioxide equivalent reduced per emission reduction measure;
  - f. An evaluation of the effectiveness of existing programs; ~~and~~

REVISIONS TO THE DRAFT EIR

- g. Considerations for the use of low-carbon and sustainable materials to reduce embodied carbon in construction and to meet GHG reduction target(s); and
- hg. Modifications to goals, policies and strategies as needed to achieve the GHG reduction target.

CHAPTER 3 PROJECT DESCRIPTION

Table 3-2, *Projected Net Change*, of the Draft EIR is hereby amended as follows:

TABLE 3-2 PROJECTED NET CHANGE					
Category	Net Change from Pipeline Development Projects	Net Change from Downtown Specific Plan	Net Change from Northeast Area Specific Plan	Additional Net Change	Total Projected Net Change (2024-2045)
Housing Units	242	1,565	1,890	<del>4,063</del> 4,603	8,300
Population	462	2,990	3,611	8,557	15,620
Non-Residential Square Footage	2,688,000	420,820	4,178,228	1,640,252	8,927,300
Jobs	8,525	908	12,990	4,107	26,530

Source: PlaceWorks, 2024.

CHAPTER 4.2 AIR QUALITY

Impact AQ-2.1 and Mitigation Measure AQ-2.1 on page 4.2-50, continuing onto page 4.2-51, of the Draft EIR are hereby amended as follows:

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

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

- Water all exposed surfaces (e.g., parking areas, staging areas, soil piles, grading areas, and unpaved access roads) at least twice daily or as often as needed to control dust emissions.

## REVISIONS TO THE DRAFT EIR

- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seedling or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compact layer of wood chips, mulch, or gravel.
- Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The ~~BAAQMD~~ Air District phone number shall also be visible to ensure compliance with applicable regulations.

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

**Impact AQ-2.2 and Mitigation Measure AQ-2.2 on page 4.2-55, continuing onto page 4.2-56, of the Draft EIR are hereby amended as follows:**

**Impact AQ-2.2:** Operation of development projects under the proposed project could generate operational emissions that exceed the Bay Area Air ~~Quality Management~~ District's (~~BAAQMD~~ Air District) regional significance thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>).

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

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

- Implementing commute trip reduction programs.
- Unbundling residential parking costs from property costs.

## REVISIONS TO THE DRAFT EIR

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

**Impact AQ-3 and Mitigation Measure AQ-3 on page 4.2-63, continuing onto page 4.2-64, of the Draft EIR are hereby amended as follows:**

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

**Mitigation Measure AQ-3:** Prior to discretionary approval by the City, project applicants for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes) or Overburdened Community, as measured from the property line of the project site to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City for review and approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and ~~BAAQMD~~ the Air District. If the HRA shows that the cumulative and project-level incremental cancer risk, noncancer hazard index, and/or PM<sub>2.5</sub> exceeds the respective threshold, as established by ~~BAAQMD~~ the Air District (all areas of the City and Sphere of Influence), the project applicant will be required to identify best available control technologies for toxics (T BACTs) and appropriate enforcement mechanisms, and demonstrate that they are capable of reducing potential cancer, noncancer risks, and PM<sub>2.5</sub> to an acceptable level. T-BACTs may include but are not limited to:

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

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

## REVISIONS TO THE DRAFT EIR

### CHAPTER 4.3 BIOLOGICAL RESOURCES

The first paragraph on page 4.3-12 of the Draft EIR is hereby amended as follows:

Known occurrences of sensitive species are documented nearby that are not in the CNDDDB. Specifically, the dusky footed woodrat (*Neotoma fuscipes annectans*) is known to be located on, or in the immediate vicinity of, an area at the western end of Devonshire Boulevard, and the highest concentrations of nests occur in riparian, coast live oak woodland, and chaparral dominated by chamise and toyon. In addition, the range of Crotch's bumble bee (*Bombus crotchii*), a candidate species under the CESA, encompasses the EIR Study Area.

The first paragraph on page 4.3-19 of the Draft EIR is hereby amended as follows:

As indicated in Table 4.3-1, *CNDDDB Plant Occurrences in the EIR Study Area*, seven special-status plant species are reported to occur within or in the vicinity of the EIR Study Area. These consist of Franciscan onion, San Francisco collinsia, western leatherwood, Hillsborough chocolate lily, arcuate bush-mallow, woodland woollythreads, and chaparral ragwort. As indicated in Table 4.3-2, *CNDDDB Animal Occurrences in the EIR Study Area*, seven special-status animal species are reported to occur within or in the vicinity of the EIR Study Area. These consist of pallid bat, western snowy plover, Santa Cruz kangaroo rat, American peregrine falcon, Alameda song sparrow, Edgewood Park micro-blind harvestman, and San Francisco garter snake. As shown in Table 4.3-1 and Table 4.3-2, these species have varied legal status or are considered Species of Special Concern or Fully Protected by the CDFW. A few have no special status but are monitored by the CDFW because of recent declines and abundance. In addition, as noted in Section 4.3.1.2, Existing Conditions, the dusky footed woodrat (*Neotoma fuscipes annectans*) is known to be located in the EIR Study Area, and the range of Crotch's bumble bee (*Bombus crotchii*), a candidate species under the CESA, encompasses the EIR Study Area.

### CHAPTER 4.6 GEOLOGY AND SOILS

The following impact discussion GEO-3 on page 4.6-16 of the Draft EIR is hereby amended as follows:

Unstable geologic units are known to be present within the EIR Study Area. As previously discussed, landslides have historically occurred and could continue to occur in areas with steeper slopes and less stable soil types. These include areas with steep slopes on the western half of the EIR Study Area and hilly areas of the EIR Study Area. Additionally, liquefaction potential is mapped where the eastern half of the EIR Study Area has ranging medium to very high liquefaction potential. While no known fault traces are located within the EIR Study Area due to certain parts of the EIR Study Area having a high liquefaction potential, and would not result in lateral spreading as a result of fault rupture is a possibility.

### CHAPTER 4.7 GREENHOUSE GAS EMISSIONS

Impact GHG-1 on page 4.7-31 of the Draft EIR is hereby amended as follows:

**Impact GHG-1:** Implementation of the proposed project ~~would~~ could exceed the greenhouse (GHG) emissions threshold of no net increase from existing conditions and would therefore not make

## REVISIONS TO THE DRAFT EIR

substantial progress toward the long-term GHG reduction goal under Senate Bill (SB) 32 or the carbon neutrality goal under Assembly Bill (AB) 1279.

## CHAPTER 4.9 HYDROLOGY AND WATER QUALITY

**The following text is hereby added to the section “State Regulations” on page 4.9-7 of the Draft EIR:**

### Senate Bill 272

This bill requires a local government within the coastal zone or within the jurisdiction of the San Francisco Bay Conservation and Development Commission to develop a sea level rise plan as part of either a local coastal program that is subject to approval by the California Coastal Commission, or a subregional San Francisco Bay shoreline resiliency plan that is subject to approval by the San Francisco Bay Conservation and Development Commission, on or before January 1, 2034.

**The following paragraph is hereby added to the end of the section “San Francisco Bay Conservation and Development Commission” on page 4.9-8 of the Draft EIR:**

BCDC recently adopted in 2024 the Regional Shoreline Adaptation Plan, which was created to provide minimum standards that must be used in subregional shoreline adaption plans, as regulated by Senate Bill 272. These guidelines would require adaption strategies that respond to coastal flood hazards by sea level rise.

## CHAPTER 4.15 TRANSPORTATION

**The text under “California Department of Transportation” subheading on pages 4.15-2 of the Draft EIR is hereby amended as follows:**

Caltrans is the owner and operator of the state highway system, which includes US Highway 101 and El Camino Real within San Carlos. In its 2020 Vehicle Miles Traveled-Focused Transportation Impact Study Guide (TISG), Caltrans developed an approach for evaluating the transportation impacts of land use projects and plans on state highway facilities; this document does not address the impacts of transportation projects. In accordance with ~~current~~ the California Environmental Quality Act (CEQA) requirements, the TISG does not consider vehicle delay in its evaluation of transportation impacts, instead focusing on vehicle miles traveled (VMT). The purposes of the TISG include providing guidance to lead agencies regarding when they should analyze potential impacts to the state highway system; to aid Caltrans staff in reviewing projects; and to ensure consistency in the assessment of impacts and identification of non-capacity increasing mitigation measures.

Caltrans also has two plans associated with walking and biking within the Bay Area: the Caltrans District 4 Pedestrian Plan and the Caltrans District 4 Bike Plan. The Caltrans District 4 Pedestrian Plan was adopted in 2021 and identifies challenges and needs related to walking along and across Caltrans roadways. The Caltrans District 4 Bike Plan was adopted in 2018 and identifies infrastructure improvements that can enhance bicycle safety and mobility throughout District 4 and remove some of the barriers to bicycling in the region.

## REVISIONS TO THE DRAFT EIR

### CHAPTER 5 ALTERNATIVES

Table 5-2 on page 5-5 the Draft EIR is hereby amended as follows:

TABLE 5-2 COMPARISON OF IMPACTS OF THE PROPOSED PROJECT AND PROJECT ALTERNATIVES

Topic	Proposed Project <sup>a</sup>	No Project Alternative	Reduced Non-Residential Buildout Alternative
Aesthetics	LTS	=	=
Air Quality	SU	<	<
Biological Resources	LTS/M	>	=
Cultural Resources	LTS	<	<
Energy	LTS	<	=
Geology and Soils	LTS	<	<
Greenhouse Gas Emissions	SU	=	<
Hazards and Hazardous Materials	LTS	=	=
Hydrology and Water Quality	LTS	=	=
Land Use and Planning	LTS	=	=
Noise	LTS	=	<
Parks and Recreation	LTS	=	=
Population and Housing	LTS	=	=
Public Services	LTS	=	=
Transportation	SU	<	=
Tribal Cultural Resources	LTS	>	<
Utilities and Service Systems	LTS	=	=
Wildfire	SU	=	=

Notes:

<sup>a</sup>. The impacts listed in this column represent the highest significance determination for each respective standard of significance.

LTS Less than Significant

LTS/M Less than Significant with Mitigation

SU Significant and Unavoidable

< Lessened impact in comparison to the proposed project

= Similar impact in comparison to the proposed project

> Greater impact in comparison to the proposed project

## REVISIONS TO THE DRAFT EIR

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## 4. List of Commenters

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Comments on the Draft Environmental Impact Report (EIR) were received from the following agencies and individuals. Letters are arranged by category, name, and date received. Each comment letter has been assigned a number, as indicated below. These letters are included in and responded to in Table 5-1, *Responses to Comments Received on the Draft EIR*, in Chapter 5, *Response to Comments*, of this Final EIR. Comments are presented in their original format in Appendix F, *Comments Received on the Draft EIR*, along with annotations that identify each individual comment number.

### 4.1 GOVERNMENTAL AGENCIES

AG1	California Geological Survey, January 1, 2025
AG2	OneShoreline, February 3, 2025
AG3	California Department of Transportation, February 19, 2025
AG4	California Department of Fish and Wildlife, February 25, 2025
AG5	San Mateo Local Agency Formation Commission, February 25, 2025
AG6	Sequoia Union High School District, March 3, 2025

### 4.2 PUBLIC HEARING ORAL COMMENTS

PH1	Public Comments at the Planning and Transportation Commission, February 3, 2025
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## LIST OF COMMENTERS

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## 5. Response to Comments

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This chapter includes a reproduction of, and responses to, each comment letter received during the public review period on the Draft Environmental Impact Report (EIR). Comments are presented in their original format in Appendix F, *Comments Received on the Draft EIR*, along with annotations that identify each individual comment number.

Responses to comments are provided in this chapter alongside the text of each corresponding comment. Letters are categorized by:

- Governmental Agencies
- Public Hearing Oral Comments

Letters are arranged by category, date received, and name. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to the Draft EIR, these revisions are shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR. Table 5-1, *Responses to Comments Received on the Draft EIR*, presents comments received on the Draft EIR and responses to each of those comments. Table 5-1 includes figures and tables included in the comment letters at a reduced image resolution. To view the images at full resolution, please refer to the original comment letters in Appendix F, *Comments Received on the Draft EIR*.

All comments included in this document are formally acknowledged for the record and will be forwarded to the decision-making bodies as part of this Final EIR for their consideration in reviewing the project.

## RESPONSE TO COMMENTS


**TABLE 5-1 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR**

Comment #	Comment	Response
<b>Governmental Agencies</b>		
<b>AG1</b>	<b>California Geological Survey, 1/31/2025</b>	
AG1-1	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.	This comment serves as an introduction to the comments that follow. Please see Responses AG1-2 through AG1-3.
AG1-2	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: <a href="https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/">https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/</a> <a href="https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/">https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/</a>	As discussed in Chapter 4.6, Geology and Soils, on page 4.6-9 of the Draft EIR, liquefaction potential within the EIR Study Area ranges from very low to very high.
AG1-3	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.	As shown in Chapter 3, <i>Revisions to the Draft EIR</i> , of this Final EIR, impact discussion GEO-3 on page 4.6-16 of the Draft EIR has been revised to clarify that certain parts of the EIR Study Area have a high liquefaction potential and that therefore lateral spreading is a possibility.


## RESPONSE TO COMMENTS

Comment #	Comment	Response
	If you have any additional comments or questions, please feel free to call or email.	
<b>AG2</b>	<b>OneShoreline, 2/3/2025</b>	
AG2-1	<p>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.</p> <p>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.</p>	This comment serves as an introduction to the comments that follow. Please see Responses AG2-2 through AG2-4.
AG2-2	<p>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.</p> <p>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 <a href="https://Oneshoreline.org/planningguidance">Oneshoreline.org/planningguidance</a>).</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> 	
AG2-3	<p>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.</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

## RESPONSE TO COMMENTS

Comment #	Comment	Response
		
AG2-4	<p><b>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.</b></p> <p><b>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.</b></p> <p>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.</p>	<p>The General Plan's Environmental Management Element and Environmental Safety and Public Services Element include policies and actions related to climate change adaptation, including planning for resilience against flooding from storms and sea level rise. The policies under Environmental Safety and Public Services (Goal ESPS -11) also promote coordination with State, regional, and local agencies, including OneShoreline, in planning for sea level rise and developing response options. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>
<b>AG3</b>	<b>California Department of Transportation (Caltrans), 2/19/2025</b>	
AG3-1	<p>Dear Akanksha Chopra:</p> <p>Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 2045 General Plan Reset. The Local</p>	<p>This comment serves as an introduction to the comments that follow. Please see Responses AG3-2 through AG3-9.</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p>Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.</p> <p>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.</p>	
AG3-2	<p>Travel Demand Analysis</p> <p>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.</p> <p>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</p>	<p>The City will take into account the 2023 Caltrans Transportation Demand Management (TDM) Toolbox and the Final Report for the VMT/Greenhouse Gas (GHG) Model Mitigation Program as part of future TDM Program updates. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>



## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p>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.</p>	
AG3-3	<p>Mitigation Strategies</p> <p>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.</p> <p>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:</p>	Please see Response AG3-2.

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<ul style="list-style-type: none"> <li>• Integrate Affordable and Below Market Rate Housing</li> <li>• Locate Developments in Area with High Destination Accessibility</li> <li>• Improve Destination Accessibility in Underserved Areas</li> <li>• Implement Transit-Supportive Roadway Treatments</li> <li>• Dedicate Land for Bike Trails</li> <li>• Construct or Improve Bike Boulevards</li> <li>• Provide Secure Bike Parking, especially near transit</li> <li>• Implement Market Price Public Parking (On-Street)</li> <li>• Create Urban Non-motorized zones</li> <li>• Provide Electric Vehicle Charging Infrastructure</li> <li>• Implement Shared Vehicle Program (car/bike/E-bike/scooter)</li> <li>• Limit Residential Parking Supply</li> <li>• Implement Market Price Public Parking (On-Street)</li> </ul>	
AG3-4	<p>Lead Agency</p> <p>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.</p>	As part of its consideration of certification of this EIR, the City of San Carlos will consider adoption of a Mitigation Monitoring and Reporting Program that will outline the implementation responsibilities of the lead agency.
AG3-5	<p>Fair Share Contributions</p> <p>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.</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

## RESPONSE TO COMMENTS

Comment #	Comment					Response
	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 Sunnyvale. Improvements include park-and-ride facilities, ramp improvements and bus stop improvements (20-minute peak headways).	2021 - 2035	\$478	

AG3-6

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.

As shown in Chapter 3, *Revisions to the Draft EIR*, of this Final EIR, Chapter 4.15, *Transportation*, of the Draft EIR has been revised to include discussion of the Caltrans District 4 Pedestrian Plan (2021), the Caltrans District 4 Bike Plan (2018), and the Caltrans Director's Policy 37.

## RESPONSE TO COMMENTS

Comment #	Comment	Response
AG3-7	<p>Construction-Related Impacts</p> <p>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 (<a href="#">link</a>). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG3-8	<p>Equitable Access</p> <p>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.</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG3-9	<p>Encroachment Permit</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>- TR-0416 Applicant's Checklist (<a href="#">link</a>)</li> <li>- Flowchart, Figure 1.2 in Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (<a href="#">link</a>)</li> </ul> <p>The permit approval may take 30 days to 6 months or more</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p>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.</p> <p>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.</p>	
<b>AG4</b>	<b>California Department of Fish and Wildlife (CDFW), 2/25/2025</b>	
AG4-1	<p>Dear Akanksha Chopra:</p> <p>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.</p> <p>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</p>	<p>The comment serves as an introduction to the comments that follow. Please see Responses AG4-2 through AG4-27.</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
AG4-2	<p>exercise of its own regulatory authority under the Fish and Game Code.</p> <p><b>CDFW ROLE</b> 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 &amp; G. Code, §§ 711.7, subd. (a) &amp; 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.</p> <p>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 &amp; G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish &amp; G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>
AG4-3	<p>California Endangered Species Act and Native Plant Protection Act</p> <p>Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the Project has the potential to result in</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>

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	<p>“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.)</p> <p>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.</p>	
AG4-4	<p>Lake and Streambed Alteration</p> <p>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</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>

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	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.	
AG4-5	<p>Raptors and Other Nesting Birds</p> <p>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).</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG4-6	<p>Fully Protected Species</p> <p>Fully protected species, such as San Francisco garter snake (<i>Thamnophis sirtalis tetrataenia</i>), California Ridgway's rail (<i>Rallus obsoletus obsoletus</i>, formerly California clapper rail) or California Black rail (<i>Laterallus jamaicensis coturniculus</i>) may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:</p> <ul style="list-style-type: none"> <li>•Take is for necessary scientific research;</li> <li>•Efforts to recover a fully protected, endangered, or</li> </ul>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.



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	<p>threatened species, live capture and relocation of a bird species for the protection of livestock; or</p> <ul style="list-style-type: none"> <li>•They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish &amp; G. Code, §§ 3511, 4700, 5050, &amp; 5515).</li> </ul> <p>Specified types of infrastructure projects may be eligible for an ITP for unavoidable impacts to fully protected species if certain conditions are met (Fish &amp; G. Code §2081.15). Project proponents should consult with CDFW early in the Project planning process.</p>	
AG4-7	<p>PROJECT DESCRIPTION SUMMARY</p> <p>Proponent: City of San Carlos</p> <p>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.</p> <p>Location: City of San Carlos, San Mateo County, CA 94070.</p> <p>Timeframe: 2025-2045</p>	<p>The comment correctly summarizes the proposed project. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>
AG4-8	<p>COMMENTS AND RECOMMENDATIONS</p> <p>CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating</p>	<p>This comment provides information on the recommendations that follow. Please see Responses AG4-9 through AG4-16.</p>

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	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.	
AG4-9	<p>I. Project Description and Related Impact Shortcoming</p> <p>COMMENT 1: Program EIR Subsequent Project Review</p> <p>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</p>	<p>The commenter's recommendation is noted. There is no requirement to have such a checklist at this time in the General Plan or CEQA process. Where future specific development projects qualify for the CEQA streamlining options described by the commenter, the City will continue to use its standard process and rely on the CEQA Guidelines Appendix G checklist, as is or as modified, to determine which potential impacts have been adequately addressed in this program-level EIR and which require additional analysis and project-specific mitigation. Please see Section 3.6, <i>Intended Uses of the EIR</i>, in Chapter 3, <i>Project Description</i>, of the Draft EIR, for a description of how the City will use the programmatic analysis in this EIR when a new development project is filed with the City.</p>

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	<p>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.</p> <p>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 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.</p>	
AG4-10	<p>II. Environmental Setting and Mitigation Measure Related Impact Shortcomings</p> <p>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?</p> <p>And,</p> <p>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</p>	<p>Table 4.3-2, <i>CNDDDB Animal Occurrences in the EIR Study Area</i>, in Chapter 4.3, <i>Biological Resources</i>, of the Draft EIR, lists the American peregrine falcon and the Alameda song sparrow occurring in the EIR Study Area. These two species are also discussed in impact discussion BIO-1. Within impact discussion BIO-1 on page 4.3-19 the Draft EIR states: "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, conflicting with both the MBTA and CFGC." The commenter incorrectly states that the Draft EIR does not mention Action</p>

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	<p>in local or regional plans, policies, or regulations, or by CDFW or U.S. Fish and Wildlife Service (USFWS)?</p> <p>COMMENT 2: Nesting Birds, Section 4.3.3, Page 4.3-18- 4.3-20</p> <p>Issue: Nesting birds, including American Peregrine falcon (<i>Falco peregrinus anatum</i>) and Alameda song sparrow (<i>Melospiza melodia pusillula</i>), 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.</p> <p>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</p>	<p>EM-1.5; it is discussed in impact discussion BIO-5 for its potential to prevent interference with the movement of wildlife species.</p> <p>The proposed 2045 General Plan Reset is a policy-level document that does not include any development projects. The certification of the EIR or the approval of the proposed project does not approve or deny any potential future development in the City of San Carlos or the EIR Study Area.</p> <p>As described in Section 3.6, <i>Intended Uses of the EIR</i>, in Chapter 3, <i>Project Description</i>, of the Draft EIR, this EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed project and determine corresponding mitigation measures, as necessary. This EIR is a program-level EIR and does not evaluate the impacts of specific, individual developments that may occur under the buildout horizon of the proposed project. Each specific future project will conduct separate environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the City for consistency with the 2045 General Plan Reset and this EIR. Because the General Plan is a program-level document, the specific details of future projects and the conditions at the time they are proposed are not known. It would be speculative to estimate any potential long-term or permanent changes, including those to the regulatory setting, and CEQA does not allow for speculation (CEQA Guidelines Section 15145). When a new development project is filed with the City, it is reviewed for completeness and consistency with</p>

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	<p>raptors range from February 15- August 30, January 15- September 15, and February 15- September 15, respectively. 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:</p> <p>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</p>	<p>the General Plan goals, policies, and actions, and City codes and practices. Because City policies, actions, and codes, presented in this program EIR will minimize impacts, development projects will inherently implement these measures to: (a) mitigate environmental impacts and (b) achieve consistency with the General Plan and compliance with City codes. Pursuant to CEQA and the CEQA Guidelines, where the “project” subject to CEQA is a “plan, policy, regulation, or other public project,” the obligation to mitigate impacts can be effectuated “by incorporating the mitigation measures into the plan, policy, regulation, or project design” (CEQA Statute Section 21081.6(b); CEQA Guidelines, Section 15126.4(a)(2)).</p> <p>As described in impact discussion BIO-1 in the Draft EIR, the proposed General Plan includes Policy EM-1.1 to ensure that potential impacts to biological resources are carefully evaluated as part of specific development applications. In response to the commenter's comments, Policy EM-1.1 has been amended and expanded, as shown in Chapter 3, <i>Revisions to the Draft EIR</i>, of this Final EIR, to specify that a biological resources assessment is required for any development sites that support habitat special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters. The purpose of a site-specific biological resource assessment prepared by a qualified biologist is to identify special-status species that may be impacted by potential future development and identify site- and species-specific mitigation measures. The project-specific biological resource assessments would determine what site- and project-specific mitigation measures would be required for sensitive natural communities at the time of the proposed development throughout the 20-year buildout horizon (2025</p>

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	<p>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.</p> <p>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 ensure that no inadvertent impacts on these nests occur. All buffers shall be shown on all sets of construction drawings.</p>	<p>to 2045) of the proposed project, to ensure sensitive resources identified at the time of future project developments are adequately protected or appropriate project-specific compensatory mitigation is provided as part of new development to reduce impacts to a less-than-significant level; this approach is appropriate for this citywide, program-level EIR. Site-specific biological resources assessments and field surveys prepared by qualified biologists would follow agency-promulgated protocols and recommended methods and standards of review—including consultation with the California Department of Fish and Wildlife and the United States Fish and Wildlife Service—and would rely on standard protocol sources. This revision does not affect any conclusions or significance determinations in the Draft EIR. Therefore, no recirculation of the Draft EIR is required pursuant to CEQA Guidelines Section 15088.5(a), <i>Recirculation of an EIR Prior to Certification</i>. While the City appreciates the recommended mitigation measures provided by the commenter, these mitigation measures include specific controls and requirements that could be subject to considerable revision over the 20-year buildout horizon, may in fact not be applicable to conditions found on a particular site, or may not be appropriate for each specific development application received by the City.</p>
AG4-11	<p>COMMENT 3: Bats, Section 4.3.3, Page 4.3-18- 4.3-20</p> <p>Issue: The DPEIR states that special-status bats such as the pallid bat (<i>Antrozous pallidus</i>) 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</p>	<p>Pallid bat is listed in Table 4.3-2, <i>CNDDDB Animal Occurrences in the EIR Study Area</i>, in the Draft EIR as an animal with occurrences in the EIR Study Area. Pallid bat is also discussed as a special-status species in impact discussion BIO-1 in the Draft EIR. Regarding the commenter's recommendations, please see Response AG4-10.</p>

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	<p>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.</p> <p>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</p>	

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	<p>recommends incorporating the following mitigation measure:</p> <p>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.</p> <p>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 habitat is found, it shall be flagged or otherwise clearly marked. Trees shall be removed only if:</p> <p>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;</p> <p>b) After a qualified biologist conducts night emergence surveys or completes visual examination of roost features that establish absence of roosting bats.</p> <p>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</p>	



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	<p>fissures shall be avoided. On the second day the remainder of the tree shall be removed.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> <li>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;</li> <li>2) Establishing suitable bat habitat structures.</li> </ol> <p>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.</p>	
AG4-12	<p>COMMENT 4: San Francisco Garter Snake, Section 4.3.3, Page 4.3-18- 4.3-20</p> <p>Issue: San Francisco garter snake (SFGS) has the potential to occur within the Project Study Area, but the DPEIR does not</p>	<p>The San Francisco Garter Snake is listed in Table 4.3-2, <i>CNDDDB Animal Occurrences in the EIR Study Area</i>, in the Draft EIR as an animal with occurrences in the EIR Study Area. The San Francisco Garter Snake is also discussed as a special-status species in impact discussion BIO-1 in the Draft EIR. Regarding</p>

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	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.	the commenter's recommendations, please see Response AG4-10.
	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,	

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	<p>commercial, and urban development, illegal collection by reptile breeders, and decline of their prey species, California red-legged frog (<i>Rana draytonii</i>).</p> <p>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).</p> <p>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 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:</p> <p>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</p>	

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	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.	
AG4-13	<p>COMMENT 5: Crotch's Bumble Bee, Section 4.3.3, Page 4.3-18- 4.3-20</p> <p>Issue: The DPEIR does not identify potential impacts to Crotch's bumble bee (<i>Bombus crotchii</i>, 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.</p> <p>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.</p> <p>Bumble bees, including CBB, are found in a wide variety of</p>	<p>As shown in Chapter 3, <i>Revisions to the Draft EIR</i>, of this Final EIR, mention of the range of Crotch's bumble bee has been added to Chapter 4.3, <i>Biological Resources</i>, of the Draft EIR. Regarding the commenter's recommendations, please see Response AG4-10.</p>

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	<p>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, 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.</p> <p>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.</p> <p>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).</p>	

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	

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	<p>nests. The qualified biologist shall expand buffer zones as necessary to prevent disturbance and avoid take.</p> <p>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.</p>	
AG4-14	<p>COMMENT 6: California Ridgway's Rail and California Black Rail, Section 4.3.3, Page 4.3-18- 4.3-20</p> <p>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.</p> <p>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</p>	<p>The California black rail is listed in Table 4.3-2, <i>CNDDDB Animal Occurrences in the EIR Study Area</i>, and California Ridgway's rail is mapped on Figure 4.3-2, <i>Special-Status Animals and Critical Habitats</i>, in the Draft EIR as animals with occurrences in the EIR Study Area. Regarding the commenter's recommendations, please see Response AG4-10.</p>

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	<p>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 entrainment, or impingement.</p> <p>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).</p> <p>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.</p> <p>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</p>	



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	<p>protocol to ensure that both species are sufficiently surveyed.</p> <p>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.</p> <p>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.</p>	
AG4-15	COMMENT 7: Special-Status Plants, Section 4.3.3, Page 4.3-18- 4.3-20	Special-status plants are listed in Table 4.3-1, <i>CNDDDB Plant Occurrences in the EIR Study Area</i> , and are also discussed in

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	<p>Issue: The DPEIR identifies the potential for special-status plant species to occur within the Study Area, including Franciscan onion (<i>Allium peninsulare</i> var. <i>franciscanum</i>), San Francisco collinsia (<i>Collinsia multicolor</i>), western leatherwood (<i>Dirca occidentalis</i>), Hillsborough chocolate lily (<i>Fritillaria biflora</i> var. <i>ineziana</i>), arcuate bushmallow (<i>Malacothamnus arcuatus</i> var. <i>arcuatus</i>), woodland woolleythreads (<i>Monolopia gracilens</i>), chaparral ragwort (<i>Senecio aphanactis</i>), alkali milk-vetch (<i>Astragalus tener</i> var. <i>tener</i>), San Joaquin spearscale (<i>Extriplex joaquinana</i>), and Contra Costa goldfields (<i>Lasthenia conjugens</i>), 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.</p> <p>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.</p>	<p>impact discussion BIO-1 in the Draft EIR. Regarding the commenter's recommendations, please see Response AG4-10.</p>

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	<p>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.</p> <p>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: <a href="https://www.cnps.org/rare-plants/california-rare-plant-ranks">https://www.cnps.org/rare-plants/california-rare-plant-ranks</a>). 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).</p> <p>Recommendation 7: CDFW recommends the PEIR incorporate the following mitigation measure to avoid, minimize, and mitigate potential impacts on special-status plants.</p>	

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	<p>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 (<a href="https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants">https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants</a>) 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.</p>	
AG4-16	<p>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?</p> <p>COMMENT 8: Riparian Delineation and Setbacks, Section</p>	<p>Riparian habitats are discussed in the existing conditions section of the Draft EIR on page 4.3-8. Riparian habitats are also discussed in impact discussion BIO-2 in the Draft EIR. Regarding the commenter's recommendations, please see Response AG4-10.</p>

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	4.3.3, Page 4.3-21	
	<p>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.</p> <p>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 understandable picture practically possible of the Project’s likely near-term and long-term impacts.</p> <p>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.</p>	

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	<p>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.</p> <p>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.”</p> <p>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, Brososke et al. 1997, Dong et al. 1998, Kiffney et al. 2003, Moore et al. 2005).</p> <p>Riparian habitats also contribute to bank stability and provide flood protection. Development, including increases in impervious surfaces and installation of stormwater</p>	

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	<p>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.</p> <p>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 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.”</p> <p>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</p>	

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	<p>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:</p> <p>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.</p>	
AG4-17	<p>ENVIRONMENTAL DATA</p> <p>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: <a href="https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data">https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data</a>. The types of information reported to CNDDDB can be found at the following link: <a href="https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals">https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals</a>.</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>



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AG4-18	<p>ENVIRONMENTAL DOCUMENT FILING FEES</p> <p>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. (Cal. Code Regs, tit. 14, § 753.5; Fish &amp; G. Code, § 711.4; Pub. Resources Code, § 21089.)</p>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG4-19	<p>CONCLUSION</p> <p>CDFW appreciates the opportunity to comment on the DPEIR to assist the City in identifying and mitigating Project impacts on biological resources.</p> <p>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.</p>	The comment serves as a conclusion to the comments that proceed. Please see Responses AG4-2 through AG4-18.
<b>AG5</b>	<b>San Mateo Local Agency Formation Commission, 2/25/2025</b>	
AG5-1	<p>Dear Ms. Chopra,</p> <p>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.</p> <p>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</p>	The comment serves as an introduction to the comments that follow. Please see Responses AG5-2 through AG5-5.

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	county and city governed special districts serving San Mateo County.	
AG5-2	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.	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG5-3	<p>San Mateo LAFCo has the following comments on the DEIR and the 2045 General Plan Reset:</p> <ul style="list-style-type: none"> <li>•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 Plan amendment will be required for each annexation under both the current and proposed Plan, as there is no City land use designation.</li> </ul>	The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG5-4	<ul style="list-style-type: none"> <li>• 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,</li> </ul>	The commenter's recommendation is noted. The wastewater projections evaluated in Chapter 4.17, <i>Utilities and Services Systems</i> , of the Draft EIR consider buildout within both the city limit and the sphere of influence. While no net increase in development is anticipated within the sphere of influence

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	<p>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 Rest 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.</p>	<p>during the buildout horizon of the proposed 2045 General Plan Reset, the commenter correctly notes that sewer demand within the city could increase as properties in the sphere of influence are annexed to the city or for other reasons added to the City's sewer service area. Impact discussions UTIL-4, UTIL-5, and UTIL-6 in the Draft EIR consider potential net increase of sewer service demand from net new development in the city limit in the context of total wastewater service and treatment demand for the City of San Carlos collection system and Silicon Valley Clean Water treatment plant capacity. Specifically, impact discussion UTIL-5 considers both treatment capacity within the city as well as existing and future demands from areas outside of the city limit. In addition, as sites within the sphere of influence are annexed to the City's service area, they would become subject to policies in the proposed General Plan, such as Policy EM-5.9, which states: "Sewer service may be extended outside the city limit only as required to protect public health due to failing septic systems in accordance with the following policies:</p> <ul style="list-style-type: none"> <li>▪ Extension of sewer service would be denied if there is insufficient capacity in the wastewater collection system.</li> <li>▪ No change to the land use would occur.</li> <li>▪ The extension of sewer service could not be used to enable further subdivision.</li> <li>▪ The property owner would be required to annex as such time as a complete consolidation of properties could be annexed.</li> <li>▪ The property owner would be required to complete all improvements necessary to meet City building and engineering standards.</li> </ul>

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		<p>▪ Applicant to assure payment of all sewer connection, plan checking and inspection fees."</p> <p>Therefore, no revisions to the Draft EIR are necessary.</p>
AG5-5	<p>• 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.</p> <p>San Mateo LAFCo looks forward to reviewing all future documents related to the General Plan reset process and the Environmental Impact Report.</p>	<p>The Draft EIR evaluates impacts within the entire EIR Study Area, which includes the City's sphere of influence. As shown in Table 3-1, <i>Proposed 2045 General Plan Reset Buildout Projections in the EIR Study Area</i>, buildout projections evaluated in the Draft EIR do not assume any net change within the City's sphere of influence. While the buildout projections in the Draft EIR do not assume any net change within the sphere of influence, this does not mean that no change or redevelopment is anticipated within the sphere of influence; rather, it means that such changes or redevelopment projects are not anticipated, in total, to result in a net increase or decrease in the overall amount of development in the sphere of influence as a whole. Therefore, no revisions to the Draft EIR are necessary.</p>
<b>AG6-1 Loxano Smith Attorney on behalf of Sequoia Union High School District, 3/3/2025</b>		
AG6-1	<p>Dear Ms. Chopra:</p> <p>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").</p>	<p>The comment serves as an introduction to the comments that follow. Please see Responses AG6-2 through AG6-7. Please note that the October 18, 2024 comment letter referenced by the commenter was received after the close of the scoping period for the Notice of Preparation of the Draft EIR but was nevertheless included in Appendix A, <i>Notice of Preparation and Scoping Comments</i>, of the Draft EIR. In response to this comment letter, the City of San Carlos invited the commenter to consult regarding preparation of the Draft EIR; as of the time of publication of this Final EIR, the City has not received a response to this invitation.</p>

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AG6-2	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.	The comment is noted. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
AG6-3	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.	The comment incorrectly states that the Draft EIR considers the payment of school fees under Government Code Section 65995 to constitute full mitigation of the proposed project's impact on the school district. Rather, page 4.14-16 of the Draft EIR states that such fees constitute "full and complete <u>school facilities</u> [emphases added] mitigation." This statement is consistent with Government Code Section 65995(h), which states: "The payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 and, if applicable, any amounts specified in Section 65995.5 or 65995.7 are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, <u>on the provision of adequate school facilities</u> [emphasis added]." Chapter 4.14, <i>Public Services</i> , of the Draft EIR, evaluates potential impacts to school services consistent with Appendix G of the CEQA Guidelines, which states that a proposed project would have a significant impact if it would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the

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Comment #	Comment	Response
		<p>construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. The impact discussion in Chapter 4.14 does not discuss the payment of school fees alone but, rather, also considers the consistency of future development projects with proposed General Plan policies, and future project-level environmental review of future school facility improvements, as well as the potential secondary effects associated with increased school enrollment. Page 4.14-17 of the Draft EIR states: "Potential secondary effects associated with increased school enrollment, such as vehicle traffic and associated air quality and noise concerns, are addressed in Chapter 4.2, Air Quality; Chapter 4.11, Noise; and Chapter 4.15, Transportation, of this Draft EIR." Therefore, no revisions to the Draft EIR are necessary.</p>
AG6-4	<p>Next, the District remains concerned that the EIR does not adequately address the General Plan's potential impact on Carlmont High School, <b>where enrollment currently exceeds capacity</b>, 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 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</p>	<p>Carlmont High School's existing capacity exceedance is noted on page 4.14-14 of the Draft EIR. Contrary to the statement of the commenter, the Draft EIR does not assume that future students will attend Sequoia High School. Rather, as stated on page 4.14-16 of the Draft EIR, the Draft EIR acknowledges that "increased student enrollment associated with the buildout projections for the proposed project could exacerbate and increase the need for facility expansions." As described in Response AG6-3, Government Code Section 65995 states that school impact fees are considered full mitigation for potential impacts to school facilities, and the Draft EIR considers the secondary effects such as those noted by the commenter.</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	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.	
AG6-5	<p>Third, the EIR assumes that increased demand on school facilities will “occur incrementally.”</p> <p>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 <u>in advance</u> of when those increased demands come.</p>	<p>The comment refers to “recent rapid growth” in San Carlos. Recent residential and population development trends are described in Chapter 4.13, <i>Population and Housing</i>, of the Draft EIR. As shown in Table 4.13-1, <i>Total Population, 2014 to 2024</i>, of the Draft EIR, the population of San Carlos increased by 1,182 persons, or 4 percent, in this 10-year time period. As shown in Table 4.13-2, <i>Housing Units, 2014 to 2024</i>, of the Draft EIR, the housing stock of San Carlos increased by 1,270 housing units, or 10 percent, in this 10-year time period. As described in Response AG6-4, the Draft EIR acknowledges that future growth under the buildout horizon of the proposed project would exacerbate the need for school facilities expansions. However, as noted on page 4.14-17 of the Draft EIR, “The estimated timing or location of future additional facility improvements are not known at this time, so project-specific environmental impacts that could occur from their construction and operation cannot be determined at this time. It would be speculative to assess the physical effects of those future construction projects and the project’s potential contribution to those effects. Pursuant to Section 15145 of the State CEQA Guidelines, if a particular impact is too speculative for evaluation, no further evaluation is required.” Therefore, no revisions to the Draft EIR are necessary.</p>
AG6-6	<p>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:</p> <p>1. Meet and Confer Requirements. The District requests a</p>	<p>As stated on page 4.14-16 of the Draft EIR, the City’s proposed General Plan includes the following policies:</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p><b><i>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.</i></b></p> <p>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.</p>	<ul style="list-style-type: none"> <li>▪ <b>Policy ESPS-13.4:</b> Work with all special districts, including the school districts, to ensure that development within the city is coordinated with provision of services.</li> <li>▪ <b>Policy ESPS-14.5:</b> Participate in the long-range planning activities with San Carlos Unified School District and Sequoia Union High School District.</li> </ul> <p>Future specific development projects within the city will be subject to project-level CEQA review as applicable, which would require evaluation of potential impacts to school services, including potential secondary impacts. The District will have the ability to comment on future CEQA documents and project applications.</p>
AG6-7	<p>2. <u>School-Related Community Benefits.</u> 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: <a href="https://www.cityofsancarlos.org/city_hall/departments_and_divisions/community_development/planning/community_benefits.php">https://www.cityofsancarlos.org/city_hall/departments_and_divisions/community_development/planning/community_benefits.php</a>. The District would like to work with the City to create a project category of items that benefit District</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>



## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p>Examples of school-related community benefit projects could potentially include:</p> <ul style="list-style-type: none"> <li>•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.</li> </ul> <p>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.</p> <p>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</p>	

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	<p>to attract and retain employees who cannot otherwise afford to live in the community where they work due to the high cost of living.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Other District-focused amenities: The District would like to explore other amenities that support District schools and students.</li> </ul> <p>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.</p>	
<b>Public Hearing Comments</b>		
PH1-1	<p><b>Vice Chair Garvey</b></p> <p>I looked at a letter from LAFCO the local agency formation commission, and they suggested that this EIR evaluate the sewer treatment capacity of future development and when I looked at the EIR I think I read that the EIR contemplates that the sewer infrastructure is fully built out. Then I was remembering some of the study sessions we had for the Northeast Plan and it didn't seem to me that all of the infrastructure for that part of the city had been fully built out. My comment is if that part of the EIR could talk about that a little bit more, if we need to build out infrastructure for parts of the city that are not fully developed, then the EIR should contemplate that in some way.</p>	<p>This comment is noted. Chapter 4.17, <i>Utilities and Services</i>, of the Draft EIR relies in part on existing plans already in place that project future service expansion in the EIR Study Area. This Draft EIR is also a program-level document, and does not analyze specific areas within San Carlos. The Northeast Area Specific Plan EIR would analyze the buildout of the sewer infrastructure within the Northeast Area in more depth.</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
PH1-2	<p><b>Vice Chair Garvey</b></p> <p>VTM impacts under CEQA would need mitigation but I was reading in the findings from Kittleson that when you look at the 2045 projected VMT as compared to the 2024 Baseline for the City there's a citywide decrease in VMT. This suggests that the buildout and land uses are performing better than existing land uses by shortening the trip length. My comment is we as a city seem to be on a good path and while we will still need to have traffic mitigation measures it was encouraging for me to see these findings that that we on a good trend line.</p>	<p>The comment is noted. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>
PH1-3	<p><b>Vice Chair Garvey</b></p> <p>I was reading the comment letter from Redwood City and they're designing a transportation management association and offered collaboration with us as a City on transportation related issues. This seemed a good idea for me for a couple of reasons and I think the EIR touches on this. Redwood City is of course a much larger city and they're our next door neighbor and I recall us as a commission talking about possibly forming a transportation management association as we get larger and bigger developments happen in the city. So this seemed like a good idea to me and to highlight that a little bit more in the EIR as a possibility for the future.</p>	<p>Forming a transportation management association is one of the recommended measures in the ongoing Citywide Transportation Demand Management and Parking Reform project. As the project gets finalized, this measure will be expanded upon more.</p>
PH1-4	<p><b>Commissioner Anand</b></p> <p>Thank you for the report its very encouraging to see that we are planning for the future as always. The one thing that I would like to see advancement in is science and technology in terms of climate change mitigation. We are looking at a lot of self-driving vehicles and electric vehicles and how they will factor in now that we have Waymo, so these are self-driving taxis,maybe they will reduce the number of parking spaces required, like there's a lot of tech advancement</p>	<p>The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.</p>

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	which I did not see as an assumption in the plan laid out in detail. So if we could have something to that effect or think about it as we think for our future I think we will have a more contemporary plan in our hands but thank you all for the work.	
PH1-5	<p><b>Commissioner Castaneda</b></p> <p>In reading through the Draft EIR I thought that there are really some excellent mitigation ideas and methods and materials that that are in the plan so I'm encouraged about all the work that we've done. I'm also assuming that we have addressed all of the issues that we needed to address in the letters that we received from the people that we have contacted, which also makes me quite pleased because they had some very good suggestions and I also share what commissioner Clements said about the idea of collaborating with Redwood City, I also agree that would be an excellent idea so thank you.</p>	The comment is noted. Comments from the Notice of Preparation have been compiled and can be viewed in Appendix A of the Draft EIR. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.
PH1-6	<p><b>Commissioner Bundy</b></p> <p>I really appreciated reading this document. I thought it was really well organized and very accessible so thank you staff and Consulting team for putting that effort in. I wanted to make one comment about the greenhouse gas mitigation, our general plan currently lacks any actions that are focused on building sector embodied carbon, so the concrete and steel the carbon that comes with those products. I would like to see an action evaluate policy approaches to targeting embodied carbon or you know including that in the CMAP mitigation measure just so we're really explicit that this is something that's on the table. I think given the scale of construction that we need in the Bay Area to meet our Regional Housing deficit that there's potential for regional approaches to lower cost or lower carbon concrete and so I</p>	As shown in Chapter 3, <i>Revisions to the Draft EIR</i> , of this Final EIR, Action EM-7.3 within the General Plan has been revised to include considerations for the use of low-carbon and sustainable materials to reduce embodied carbon in construction and to meet GHG reduction target(s).

## RESPONSE TO COMMENTS

Comment #	Comment	Response
	just wanted to encourage that consideration.	
PH1-7	<p><b>Commissioner Bundy</b></p> <p>Flooding item: if the text could be updated to reflect the Senate Bill 272 sea level rise adaptation planning requirements and BCDC's December adoption of the Regional Shoreline Adaptation Plan and possibly including an action associated with participating in a multi-jurisdictional RSAP. I would like to see that as well.</p>	As shown in Chapter 3, <i>Revisions to the Draft EIR</i> , of this Final EIR, mention of the Senate Bill 272 and BCDC's Regional Shoreline Adaptation Plan have been added to Chapter 4.9, <i>Hydrology and Water Quality</i> , of the Draft EIR.
PH1-8	<p><b>Chair Clements</b></p> <p>I really like what commissioner Bundy just said and I'm not sure if the EIR is the place to note that or if it's within the CMAP but wherever the appropriate places to note lower carbon growth if we can. All of the regional efforts that will be going on around climate change and adaptation would be important. This was very interesting to me thank you for the presentation and all the help understanding what goes into what is a fairly prescribed process of how you do an EIR for a program like this and an update for the general plan. It's very interesting to learn all the details that go into it and the assumptions so thank you for the high quality report.</p>	Additional, more detailed climate change and adaption planning will be conducted as part of the CMAP update following the 2045 General Plan Reset.
PH1-9	<p><b>Chair Clements</b></p> <p>I want to make sure that we think through the jobs housing balance. I know housing and population was one of the areas not deemed to have a significant impact but as we adopt new capacity numbers I want to make sure that we think through if anything needs to be adjusted to make sure that we ourselves are growing in a sustainable manner. Even if some of the jurisdictions in the area are not either growing in that ratio or perhaps intending to grow in that way, I'm happy to see that we are and I just want to be mindful that the numbers reflect that work.</p>	The comment is noted. The comment does not address the adequacy of the analysis in the Draft EIR; therefore, no further response is warranted.

## RESPONSE TO COMMENTS

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2040 Bancroft Way, Suite 400  
Berkeley, California 94704  
t 510.848.3815

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APPENDIX E:  
REVISED PROPOSED GENERAL  
PLAN AMENDMENTS



## Appendix E: Revised Proposed General Plan Amendments

This document presents proposed amendments to the San Carlos 2030 General Plan. Underlined text represents language that has been added to the General Plan; text with ~~striketrough~~ has been deleted from the General Plan. Text that is highlighted is text that has been revised following publication of the Draft EIR. This document focuses on non-formatting changes to the policies and actions of the General Plan and does not include changes to the General Plan format, background information, or narrative language.

### Front Matter

**Land Acknowledgement:** The City of San Carlos acknowledges that our lands are located on the ancestral homeland of the Ohlone peoples, and that, as the original stewards of this land, the Ohlone understood the interconnectedness of all things and maintained harmony with nature for millennia.

### Chapter 3 – Land Use Element

- **Action LU-1.1:** Continue to evaluate the Transportation Demand Management Ordinance to encourage mode shift ~~Amend the Zoning Ordinance to create a Transportation Demand Management Ordinance that contains strategies to enhance travel patterns and to reduce vehicular trip generation from new development by 20 percent.~~
- **Policy LU-4.3:** Annexation of undeveloped parcels shall be in substantial compliance with the following criteria:
  - a. The parcels are contiguous to parcels located in the City of San Carlos and contiguous or provisions have been made to become contiguous to city streets.
  - b. Require minimum lot size in hillside areas considered for subdivision or annexation to be larger than lots on flat areas to minimize slope instability, erosion and drainage impacts. Lots shall meet, or shall be merged to meet, the minimum lot size established in the subdivision ordinance.
  - c. Parcels with development potential of five or more lots shall cluster single-family detached homes ~~utilizing the Planned Community PC zone~~ to the degree feasible. In such cases the density may not exceed the density permitted by the lot size standards of the San Carlos Subdivision Ordinance. Further, the provisions related to portions of the development which must remain ungraded shall apply. Only the lot size requirements may vary. In such cases, the minimum lot size shall be 10,000 square feet.
- **Policy LU-4.6** Parcels proposed for annexation to the City shall be prezoned.
  - a. Undeveloped Residential Parcels. Parcels with development potential of five or more lots shall be zoned to Planned Community ~~(with minimum R-1 LD Development Standards)~~ Development with minimum RS-3 development standards prior to approval of a Tentative Subdivision Map. Parcels with development potential of less than five lots shall be prezoned RS-3.
  - b. ~~Other parcels proposed for annexation shall be prezoned R-1 LD Low Density, Single Family Residential District.~~ Developed residential parcels and parcels with development potential for

## Appendix E: Revised Proposed General Plan Amendments

nonresidential use shall be rezoned consistent with surrounding and/or like zoning district classifications which represent uses intended for the property.

- **Policy LU-5.16:** Identify, develop and implement ~~Redevelopment Agency-sponsored~~ programs and other public/private partnership developments to help facilitate economic development.
- **Action LU-6.5:** Continue to implement the East Side Innovation District Vision Plan adopted on October 25, 2021 (Resolution 2021-107).
- **Policy LU-5.17:** Encourage the development as well as improvements to the ingress and egress on the following public parking lots ~~plazas~~: South Plaza, Williams Plaza, Wheeler Plaza and Clark Plaza. Encourage the consolidation and acquisition of parcels when opportunities become available to expand the public parking lots ~~plazas~~, provide improved ingress and egress and improve the efficiency of design.
- **Action LU-7.1:** Continue to implement the City's adopted Bicycle and Pedestrian Master Plan adopted on June 9<sup>th</sup>, 2020 and update the Master Plan as needed. ~~Prepare a community study to seek new ways to enhance walkability and connect all areas of the community. The current Bicycle Transportation Plan could be expanded to be a Bicycle and Pedestrian Transportation Plan.~~
- **Policy LU-8.19:** Residential structures shall be de- signed to be compatible with existing structures in the vicinity, avoid obstructing views from adjacent structures or views of community importance, avoid interference with the right or ability to use solar energy and be consistent with the Objective Design Standards ~~community design principles~~.
- **Policy LU-12.1:** Evaluate historical, cultural, and tribal cultural resources early in the development review process through consultation with interested parties.
- **Action LU-12.1:** Ensure thorough compliance with the provisions of the California Environmental Quality Act (CEQA) relating to potential impacts to cultural, ~~and~~ historical, and tribal cultural resources.
- **Action LU-12.6:** The City of San Carlos shall develop mapping to indicate areas in the City with archaeological sensitivity and guidance documentation for public and private construction projects that involve ground disturbance activities in areas with archaeological sensitivity. The requirements may include 1) an archeological records search, 2) construction training for cultural sensitivity, and 3) procedures if archaeologic resources are discovered.

## Chapter 5 – Circulation and Scenic Highways Element

- **Policy CSH-3.1:** Strive to reduce baseline and development-related traffic by implementing and enforcing the Transportation Demand Management Ordinance ~~20 percent through public private partnership efforts~~.
- **Policy CSH-3.3:** Support the incorporation of Transportation Demand Management measures in new development to reduce traffic impacts.

## Appendix E: Revised Proposed General Plan Amendments

- **Policy CSH-3.7:** Public sidewalks and walkways shall be designed to accommodate access in accordance with the Americans with Disabilities Act, and including any other applicable State and federal laws, regulations and guidelines, and shall be kept clear of obstruction.
- **Policy CSH-3.8** The City shall ~~strive to maintain intersection~~ continue to evaluate service levels ~~above the mid-range of level D (not to exceed a Volume to Capacity Ratio (V/C) of .85 or a total average delay time at intersections of 45 seconds whenever V/C Ratio is not available)~~ metrics as provided by the City's Transportation Impact Analysis (or Transportation Study) Guidelines as adopted November 12, 2024, Resolution 2024-118. The City recognizes that certain development project(s) may cause ~~this level of service goal~~ these thresholds to be exceeded. The City may approve such development project(s) if specific economic, legal, social, technological, or other benefits outweigh the ~~adverse~~ effects of exceeding the ~~mid-range level D goal~~ thresholds as set forth in the Transportation Study Guidelines.
- **Action CSH-3.2:** The City shall consider adoption of a Transportation Impact Fee for new development to support city-wide Transportation Demand Management measures.
- **Policy CSH-4.2:** Reduce potential conflicts, safety hazards and physical obstacles between bicyclists, automobiles and pedestrians and ensure compliance with the Americans with Disabilities Act, and including any other applicable State and federal laws, regulations and guidelines.

## Chapter 6 – Environmental Management

- **Policy EM-1.1:** Ensure that potential impacts to biological resources and sensitive habitat are carefully evaluated when considering development project applications through the preparation of a biological resources assessment by a qualified biologist. Require such biological resource assessments as part of project approval for proposed development on sites that may support special-status plant and animal species, sensitive natural communities, important wildlife corridors, riparian habitat, or regulated wetlands and waters.
- **Action EM-1.5:** Require that major new buildings and taller structures that extend above the existing surrounding urban fabric and height of the tree canopy be designed to minimize the potential risk of bird collisions using input from the latest bird-safe design guidelines and best management practice strategies to reduce bird strikes.
- **Action EM-7.3:** Update the Climate Action Plan (CAP) every five years, including but not limited to:
  - a. A revised greenhouse gas (GHG) emissions inventory;
  - b. An overview of new knowledge of the causes and anticipated impacts of climate change;
  - c. Collaborate with stakeholders and volunteers to assist in the preparation and implementation of the effective CAP.
  - d. An assessment of the appropriateness and adequacy of San Carlos' GHG reduction target;
  - e. A summary of the quantified cost per metric ton of carbon dioxide equivalent reduced per emission reduction measure;
  - f. An evaluation of the effectiveness of existing programs; ~~and~~

g. Considerations for the use of low-carbon and sustainable materials to reduce embodied carbon in construction and to meet GHG reduction target(s); and

hg. Modifications to goals, policies and strategies as needed to achieve the GHG reduction target.

## Chapter 7 – Parks and Recreation

- **Policy PR-2.3:** Continue to support implementation of trail connections as identified in the City's Master Plan for Parks, Open Space, Buildings and other Recreation Facilities Potential Trail Connections Plan.
- **Policy PR-3.7:** Protect the Youth Center as a valuable venue ~~exclusively for giving priority to~~ youth activities and programs as subject to the terms in the Youth Center Use Policy adopted by City Council.

## Chapter 9 – Noise

- **Policy NOI-1.8:** ~~During all phases of construction activity, reasonable noise reduction measures shall be utilized to minimize the exposure of neighboring properties to excessive noise levels.~~  
~~a. Construction~~ All construction activities shall comply with the City's noise ordinance. Development projects that require an acoustical study shall incorporate reasonable noise and vibration reduction measures and best management practices to minimize excessive noise levels during all phases of construction activity. Reduction measures and best management practices may include, but are not limited to, noise control techniques for construction tools and equipment, construction site management techniques, temporary noise barriers, noise monitoring and reporting, and/or construction traffic management.
- **Policy NOI-1.12:** Ensure consistency with the noise compatibility policies and criteria contained in the San Carlos Airport Land Use Plan Comprehensive Airport Land Use Compatibility Plan for the Environs of San Carlos Airport.

APPENDIX F:  
COMMENTS RECEIVED ON THE  
DRAFT EIR





**From:** [Zachariasen, Judith@DOC](mailto:Zachariasen.Judith@DOC)  
**To:** [achopra@cityofsancarlos.org](mailto:achopra@cityofsancarlos.org)  
**Cc:** [OLRA@DOC](mailto:OLRA@DOC); [OPR State Clearinghouse](#)  
**Subject:** 2045 General Plan Reset - SCH no. 2024060037  
**Date:** Friday, January 31, 2025 2:49:09 PM  
**Attachments:** [image001.png](#)

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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

**California Department of Conservation**

715 P Street, MS 1900, Sacramento, CA 95814  
T: (916) 879-2844

AG1-1

AG1-2

AG1-3

E: [judith.zachariasen@conservation.ca.gov](mailto:judith.zachariasen@conservation.ca.gov)

From: [Mickie Miller](#)  
To: [Mickie Miller](#)  
Subject: FW: Comment on the Feb. 3, 2025 Meeting Agenda Item 6.a. - General Plan Reset  
Date: Tuesday, March 11, 2025 1:50:05 PM  
Attachments: [Pulgas Creek Pump Station across from a new development on Industrial Road during a high tide.jpg](#)  
[Email](#)  
 [outlook.officeapps](#)

From: Len Materman <[Len@oneshoreline.org](mailto:Len@oneshoreline.org)>  
Sent: Monday, February 3, 2025 2:22 PM  
To: Kristen Clements <[krclements@cityofsanctos.org](mailto:krclements@cityofsanctos.org)>; Twisha Anand <[tanand@cityofsanctos.org](mailto:tanand@cityofsanctos.org)>; Summer Bundy <[sbundy@cityofsanctos.org](mailto:sbundy@cityofsanctos.org)>; Janet Castaneda <[jcastaneda@cityofsanctos.org](mailto:jcastaneda@cityofsanctos.org)>; Ellen Garvey <[egarvey@cityofsanctos.org](mailto:egarvey@cityofsanctos.org)>  
Cc: Andrea Mardesch <[amardesch@cityofsanctos.org](mailto:amardesch@cityofsanctos.org)>  
Subject: Comment on the Feb. 3, 2025 Meeting Agenda Item 6.a. - General Plan Reset

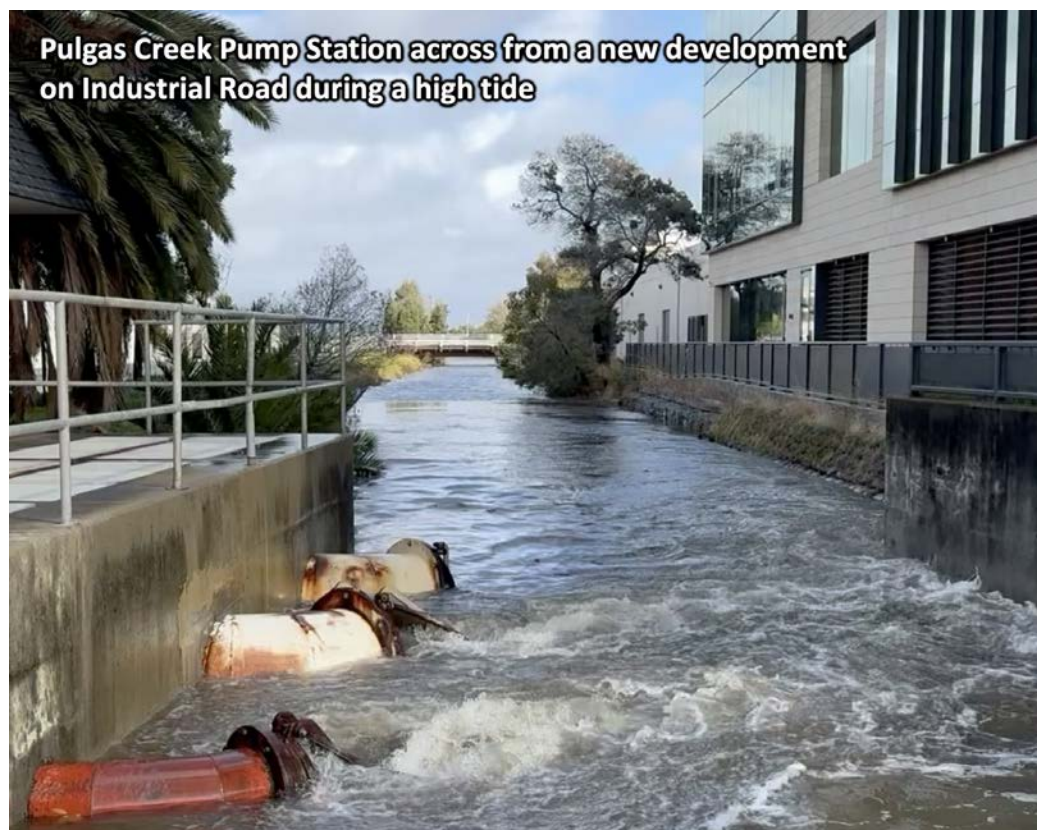
Dear Planning and Transportation Commissioners:

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](https://www.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.



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.

AG2-1

AG2-2

AG2-3



AG2-3  
cont.

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)



AG2-4

## 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](http://www.dot.ca.gov)



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.

AG3-1

AG3-2

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.

AG3-2  
Cont.

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:

AG3-3

- 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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AG3-5  
cont.

### 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.

AG3-6

### 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.

AG3-7

### 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.

AG3-8

### 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.

AG3-9

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](#))

AG3-9  
cont.

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](mailto: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](mailto: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](mailto:LDR-D4@dot.ca.gov).

Sincerely,



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

c: 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](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



February 25, 2025

Akanksha Chopra, Associate Planner  
 City of San Carlos  
 600 Elm Street  
 San Carlos, CA 94070  
[AChopra@cityofsancarlos.org](mailto:AChopra@cityofsancarlos.org)

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.

AG4-1

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.

AG4-2

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 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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 City of San Carlos  
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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.

AG4-2  
 cont.

### **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.)

AG4-3

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).

AG4-5

## 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:

AG4-6

- 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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cont.

AG4-8

AG4-9

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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.

AG4-9  
 cont.

## 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.

AG4-10

**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.

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 cont.

**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).

AG4-11

**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.

AG4-11  
cont.

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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.

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**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.

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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.

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**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.

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**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 entrainment, 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.

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**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.

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**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.

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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



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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:

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**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>.

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## 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.)

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cont.

## CONCLUSION

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

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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](mailto:Shannon.Husband@wildlife.ca.gov); or Wesley Stokes, Senior Environmental Scientist (Supervisory), at (707) 339-6066 or [Wesley.Stokes@wildlife.ca.gov](mailto: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

## REFERENCES

Berthon, K., Thomas, F., and Bekessy S. 2020. The role of 'nativeness' in urban greening to support animal biodiversity. *Landscape and Urban Planning* 205 (2021) 103959.

Brosofske, K.D., J. Chen, R.J. Naiman, and J.F. Franklin. 1997. Harvesting effects on microclimatic gradients from small streams to uplands in western Washington. *Ecological Applications* 7:1188-1200.

California Department of Transportation. 2019. Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions.

Castelle, A.J., C. Conolly, M. Emers, E.D. Metz, S. Meyer, M. Witter, S. Mauermann, T. Erickson, and S.S. Cooke. 1992. Wetlands buffers use and effectiveness. Adolfson Associates, Inc., Shorelands and Coastal Zone Management Program, Washington Department of Ecology, Olympia, WA. Pub. No. 92-10.

CDFW. 2007. California wildlife: conservation challenges. California Department of Fish and Game, Sacramento, CA.

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Czech, Brian & Krausman, Paul & Devers, Patrick. (2000). Economic Associations Among Causes of Species Endangerment in the United States. *Bioscience*. 50. 10.1641/0006-3568(2000)050[0593:EAACOS]2.0.CO;2.

Davies, K.F., C. Gascon, and C.R. Margules. 2001. Habitat fragmentation: consequences, management, and future research priorities. Pages 81-97 in: M.E. Soule and G. H. Orians, (eds.) *Conservation Biology: Research Priorities for the Next Decade*. Island Press, Washington, DC.

Dong, J., J. Chen, Brososke, K.D., and R.J. Naiman, 1998. Modeling air temperature gradients across managed small streams in western Washington. *Journal of Environmental Management* 53:309-321.

Hatfield, R., S. Jepsen, S. F. Jordan, M. Blackburn, and A. Code. 2018. A petition to the state of California Fish and Game Commission to list the Crotch bumble bee (*Bombus crotchii*), Franklin's bumble bee (*Bombus franklini*), Suckley cuckoo bumble bee (*Bombus suckleyi*), and western bumble bee (*Bombus occidentalis occidentalis*) as endangered under the California Endangered Species Act. Xerces Society for Invertebrate Conservation, Defenders of Wildlife, and Center for Food Safety. Sacramento, CA.  
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161902&inline>.

Hollis, G. 1975. The effect of urbanization on floods of different recurrence interval. *Water Resources Research* 11:431-435.

Kiffney, P. M., J. S. Richardson, and J. P. Bull. 2003. Responses of periphyton and insects to experimental manipulation of riparian buffer width along forest streams. *Journal of Applied Ecology* 40:1060-1076.

Konrad, C.P. and D.B. Booth. 2005. Hydrologic changes in urban streams and their ecological significance, paper presented at American Fisheries Society Symposium, American Fisheries Society.

Moore, R. D., D. L. Spittlehouse, and A. Story. 2005. Riparian microclimate and stream temperature response to forest harvesting: a review. *Journal of the American Water Resources Association* 41:813-834.

Moyle P.B. 2002. *Inland fishes of California*. University of California Press. Berkeley, CA.

U.S. Fish and Wildlife Service. 1985. Recovery Plan for the San Francisco Garter Snake (*Thamnophis Sirtalis Tetrataenia*). U.S. Fish and Wildlife Service, Portland, Oregon. 77 pp.

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U.S. Fish and Wildlife Service. 2007. Species Account San Francisco Garter Snake (Thamnophis Sirtalis Tetrataenia). U.S. Fish and Wildlife Service, Sacramento, California.

U.S. Fish and Wildlife Service. 2025. Bats are one of the most important misunderstood animals. Available online at: Bats are one of the most important misunderstood animals, <https://www.fws.gov/story/bats-are-one-most-important-misunderstood-animals>.

Wood, J.K., Nur, N., Salas, L. and O.M.W. Richmond. 2016. Site-specific Protocol for Monitoring Marsh Birds: Don Edwards San Francisco Bay and San Pablo Bay National Wildlife Refuges. Prepared for the U.S. Fish and Wildlife Service, Pacific Southwest Region Refuge Inventory and Monitoring Initiative. Point Blue Conservation Science. Petaluma, CA.



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

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AG5-2

AG5-3

**COMMISSIONERS:** RAY MUELLER, CHAIR, COUNTY ▪ VIRGINIA CHANG KIRALY, VICE CHAIR, SPECIAL DISTRICT ▪ KATI MARTIN, SPECIAL DISTRICT  
▪ DEBBIE RUDDOCK, CITY ▪ STEPHEN RAINALDI, CITY ▪ JACKIE SPEIER, COUNTY ▪ ANN DRAPER, PUBLIC

**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.

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cont.

- 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.

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AG5-5

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](mailto:rbartoli@smcgov.org)  
650-363-4224



Kelly M. Rem  
Attorney at Law

E-mail: krem@lozanosmith.com

March 3, 2025

**By E-Mail: [achopra@cityofsancarlos.org](mailto: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”).

AG6-1

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.

AG6-2

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.

AG6-3

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

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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.

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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.

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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.

AG6-6

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](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.

AG6-7

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.

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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.

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cont.

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)

