



Planning and Transportation Commission STAFF REPORT

MEETING DATE: January 17, 2023

ITEM TITLE: 808 Alameda de las Pulgas Townhome Development - Public
Comment Hearing on the Draft Environmental Impact Report

FISCAL IMPLICATIONS:

None for this action.

BACKGROUND:

. The project site is the former location of the Black Mountain Spring Water Company. It contains remnants of the bottling facility, including a tunnel used to harvest the natural spring at the eastern boundary of the site. The site is one of three hillside properties west of Alameda de las Pulgas and between Madera Avenue and Melendy Drive that the City sought to preserve through Measure V in 2015. Following failure of Measure V, the land was purchased by project applicant.

The site consists of 4 parcels with the following Assessor's Parcel Numbers (APNs) and street addresses:

1. APN 049-360-060 at 800 Alameda de las Pulgas
2. APN 050-220-020 at 804 Alameda de las Pulgas
3. APN 050-220-170 at 806 Alameda de las Pulgas
4. APN 050-220-160 at 808 Alameda de las Pulgas

The four parcels that comprise the site total approximately 11.4 acres of hillside terrain with an average 28.5 percent slope.

The San Carlos 2030 General Plan designates the majority of the project site as Single Family while the far western portion of the site is designated as Single-Family, Low-Density. The project site is zoned RS-6: Single-Family on the City of San Carlos zoning map. It is also within the Neighborhood Hub and Hillside Overlay Districts.

Following is a chronology of project history:

Event	Date
Pre-application review	2017 - 2018
Community workshop	November 14, 2018
Application filed	December 11, 2018
First Notice of Preparation (NOP) review period	February 11 – March 11, 2019
Public Scoping Meeting	March 4, 2019

Revised application	September 25, 2019
Revised application	September 15, 2020
Second Notice of Preparation review period	January 8 – February 8, 2021 ⁽¹⁾
Revised application	March 8, 2021
Application deemed complete	April 12, 2021 ⁽²⁾
First Non-Compliance Letter	May 7, 2021 ⁽³⁾
Revised application	January 28, 2022
Second Non-compliance Letter	February 28, 2022 ⁽³⁾
Draft EIR review period	December 1, 2022 – January 30, 2023
Public Hearing on the Draft EIR	January 17, 2023

1. The City determined that a second NOP reflecting the revised September 15, 2020, project should be circulated to allow responsible agencies and the public to comment on the revised project.
2. Application deemed complete means that all the information required by the City's application checklist was submitted.
3. Pursuant to Government Code 65589.5, the City provided a detailed list of items where the resubmitted project does not comply with City plans, policies, ordinances, standards, and code requirements, or where submitted information is insufficient to determine compliance.

Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the first and second NOP, as well as the comments received by the City in response to both NOP.

PROJECT DESCRIPTION:

The proposed project includes the components outlined below: ts. A complete project description can be found starting on page 3-1 of the DEIR.

Townhomes: The project includes construction of 87 attached townhome units consisting of 2, 3 and 4-bedroom units between 2,525 to 2,950 square feet in area on 11.4 acres. The townhomes would be organized into 17 clusters ranging from two to eight units per cluster. The townhomes include rooftop patios. The applicant requests a density bonus to achieve 87 units over the 68 units allowed by the RS-6 zone, a density bonus of 28 percent. A total of 10 units will be below market rate deed-restricted units.

Parking: The proposed project would include 206 total vehicular parking spaces on-site. Each townhome would have a two-car garage for a total of 174 covered parking spaces for residents. There would be 32 on-site, on-street parking spaces for townhome guests distributed along the main roadway throughout the site. There are 11 street parking spaces on Alameda de las Pulgas available for guests and public parking.

Open Space: The proposed project would disturb approximately 10.1 acres and leave approximately 1.4 acres in a natural state with no grading or disturbance. A total of 3.6 acres (31.5 percent of the project site) would be common open space area including undisturbed area and disturbed area restored with landscaping.

Circulation: The primary roadway extending from Alameda de las Pulgas (Public Street A) would be a public street designed to connect to the property to the north and ultimately to Coronado Ave. The remainder of the streets are private.

Trails, Pedestrian and Bicycle Facilities. The project includes a series of publicly accessible walking trails through the open space areas. The public street would have sidewalks on both sides and bicycle lanes, and the private streets would have sidewalks on at least one side. The project includes a new crosswalk across Alameda de las Pulgas with flashing beacons.

Tree Removal. Of the existing 384 trees on the site, 272 trees would be removed for development, 159 of which are considered protected. A total of 124 new trees would be planted resulting a total of 236 trees including the 112 preserved trees.

Grading. Because of the slope restraints, a cut-and-fill strategy will be used to create developable sites, resulting in an export of 35,200 cubic yards of soil. Earthwork is not expected for the Natural State Area.

Demolition: The existing residences will be demolished, and the four parcels would be combined into a single parcel.

Figure 1: Proposed Site Plan



Figure 3-13
Overall Landscape Planting Plan

Figure 2: Proposed Renderings



Source: Zapir Visualizations, 2022.

Figure 3-8
Townhome Rendering, Looking Northwest

Project plans are available on the City's website:

<https://www.cityofsancarlos.org/Home/Components/FlexPlanningZoningProjects/PlanningZoningProjects/59805/407>

PURPOSE OF MEETING:

The purpose of this meeting is to receive public testimony on the contents of the Draft EIR. While CEQA itself does not require a public hearing to receive verbal comments on a Draft EIR, prevailing practice is to hold a hearing to enhance opportunities for public participation in the CEQA process. Speakers are encouraged to express their views on the adequacy of the Draft EIR, rather than on the merits of the project itself. Comments should focus on:

- Sufficiency of the Draft EIR in discussing potentially significant environmental impacts;
- Feasibility and effectiveness of identified mitigation measures;
- Additional ways in which potentially significant impacts might be minimized; and
- Sufficiency of the range of Project Alternatives considered in the Draft EIR.

Following the conclusion of public comments, Planning Commissioners may choose to make their own individual comments on the Draft EIR but are under no obligation to do so. No formal decisions by the Planning Commission will be made at this meeting.

SUMMARY OF DRAFT EIR FINDINGS:

The Draft EIR concludes that with mitigation, all potentially significant environmental impacts would be reduced to a less-than-significant level. Potential impacts involve Air Quality, Biological

Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Noise, Transportation, Tribal Cultural Resources and Wildfire.

A summary of the mitigation measures can be found as Attachment 1, and in Table 1-1, *Summary of Significant Impacts and Mitigation Measures*, starting on page 1-7 of the Draft EIR. Most are prevailing "best practices", including noise/dust requirements for construction activity, nesting bird surveys, wetland protection, asbestos removal, and procedural requirements should cultural artifacts and/or human remains be found. Project-specific mitigation measures pertain to aesthetics, biological resources, hazards and hazardous materials, noise, transportation, and wildfire.

The tree evaluation in the Arborist Report prepared by the applicant's arborist indicates that an estimated 272 trees of the 384 included in the inventory would be removed to accommodate proposed development, 159 of which are considered protected. This represents roughly 71% of the trees on the project site and adjacent lands. Of these trees proposed for removal, a total of 150 or roughly 55% are native species.

Given the magnitude of anticipated tree loss associated with the proposed project, potential impacts are considered *significant*. Policy EM-1.5 of the San Carlos 2030 General Plan calls for promoting the preservation of native species, habitat, and vegetation types and overall natural diversity, and Policy EM-3.1 calls for maintaining and expanding the urban canopy with special emphasis on protection of heritage trees; the project, as currently proposed, would conflict with these General Plan policies. Similarly, the proposed project would conflict with Section 18.18.070 of the landscape provisions of the San Carlos Municipal Code, including regulations related to the removal of trees which qualify as "protected," "significant," and "heritage" and would therefore need to provide adequate replacement plantings.

A total of 20 native trees were identified by the EIR biologist as warranting further consideration for preservation through adjustments in the limits of grading and development. Mitigation measure BIO-5b calls for trees near the limits of grading to be preserved and protected to the greatest extent possible where feasible from an engineering and geotechnical standpoint, and warranted based on their fair to good health and structure. At minimum, these shall include consideration of preservation of heritage trees #1, 2, 3, 4, 5, 22, 23, 24, 26, 34, 35, 36, 69, 86, 228, 328, 332, 333, 334, and 335. Where it is determined that preservation is feasible, the project applicant shall revise project grading and development plans to reflect adjustments to the limits of grading and improvements, use of retaining walls, and other methods.

In addition, mitigation measure BIO-5d calls for a Tree Replacement Program to be prepared as part of the Landscape and Vegetation Management Program (LVMP) to provide for replacement of oak woodlands and individual native trees removed by proposed development. The Tree Replacement Program shall provide for replacement of individual native heritage trees at a minimum 1:1 ratio and shall preferably be accomplished on-site in areas to be retained as undeveloped open space.

PROJECT ALTERNATIVES:

As required by CEQA, the Draft EIR analyzes a reasonable range of alternatives to the proposed project. The purpose of the alternatives analysis is to determine whether there is a feasible way to achieve the basic objectives of the project, while avoiding or substantially lessening the project's significant effects. The Draft EIR also evaluates the comparative merits of the alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be

discussed; however, an EIR is not required to consider alternatives which are infeasible or unreasonable. The Draft EIR considered and rejected three alternatives related to Alternate Location, Reduced Housing, and Multi-Family Housing.

The Draft EIR evaluates two alternatives:

- **No Project Alternative:** Under the No Project Alternative, the proposed project would not be developed, and conditions on-site would remain on the project site and would be occupied. No new development or site improvements associated with the proposed project would occur.
- **Tree Preservation Alternative:** The Tree Preservation Alternative is intended to reduce impacts to biological resources by reducing the number of trees removed for development. Under the Tree Preservation Alternative, the overall development footprint would be similar to the proposed project, and the same number of housing units would be developed, but the project site plan would be adjusted (including relocation of units, reduced unit size for some units, and rerouting of the proposed trail) to preserve approximately 17 heritage trees on-site, selected due to notable size and conditions.

In addition to the discussion and comparison of project-related impacts versus alternatives related impacts, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. The environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the selected alternative may not be the alternative that best meets the goals or needs of the project applicant or the City of San Carlos.

As discussed in the Draft EIR, the No Project Alternative would, in comparison to the proposed project, result in fewer impacts. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the No Project Alternative, the Draft EIR shall also identify an environmentally superior alternative among the other alternatives. In the case of this analysis, the Tree Preservation Alternative would be the next environmentally superior alternative. In comparison to the proposed project, the Tree Preservation Alternative would result in a slight reduction to the extent of the project’s significant-but-mitigable impact associated with tree removal.

As described above, mitigation measure BIO-5b largely accomplishes the objectives of the Tree Preservation Alternative.

PUBLIC NOTICE:

This public hearing and the Notice of Availability (NOA) was noticed on December 1, 2022 to property owners and occupants within 500 feet of the project site, as well as to various State and local agencies, and other interested parties. In addition, all persons previously requesting notification on the project received the NOA. The NOA was also posted with the State Clearinghouse and County Clerk to begin the 60-day public comment period. Email notices were sent to interested parties with known email addresses. The NOA and DEIR is also posted on the City’s webpage at:

<https://www.cityofsancarlos.org/Home/Components/FlexPlanningZoningProjects/PlanningZoningProjects/59805/407>

Respectfully submitted by:

Lisa Costa Sanders, Principal Planner Consultant

ATTACHMENT(S):

1. Summary of Mitigation Measures
2. 808 Alameda de las Pulgas Townhome Development Draft EIR:
<https://www.cityofsancarlos.org/Home/Components/FlexPlanningZoningProjects/PlanningZoningProjects/59805/407>