



**COUNTY OF SAN MATEO - PLANNING AND BUILDING DEPARTMENT**

**ATTACHMENT H**

# **2567 El Camino Real Hotel Project**

## **North Fair Oaks Plan EIR Consistency Analysis**



**Case No: PLN 2021-00081**

**Planning Commission Meeting: July 26, 2023**  
**Board of Supervisors Meeting: October 17, 2023**

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**June 2023**

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**2567 EL CAMINO REAL HOTEL PROJECT  
NFO PLAN EIR CONSISTENCY ANALYSIS**

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# 1 INTRODUCTION

**Project Title:** 2567 El Camino Real Hotel Project

**County File Number(s):** PLN 2021-00081

**Lead Agency Name and Address:** County of San Mateo  
455 County Center, 2<sup>nd</sup> Floor  
Redwood City, CA 94063

**Contact Person and Phone Number:** Kanoa Kelley, Project Planner; kkelley@smcgov.org

**Project Location:** 2567 El Camino Real, 2561 El Camino Real, 11 Northumberland Avenue, Redwood City

**Assessor's Parcel Number:** 054-261-230; 054-261-220; 054-261-210

**Size of Parcel:** 12,487 sq. ft. (0.32 acres)

**Project Sponsor's Name and Address:** Dazhi Chen, Owner  
Commons Hotels LLC  
1561 South Blaney Avenue  
San Jose, CA 95129

**Owners:** Commons Hotels LLC

## Parcel Information:

APN	Address	Parcel Size	General Plan Designation	Existing Zoning	Existing Land Use
054-261-230; 054-261-220; 054-261-210	APN 054-261-220: 2567 El Camino Real	12,487 sq. ft. (0.32 acres)	APN 054-261-230: Medium High Density, Commercial Mixed Use	APN 054-261-230: CMU-1 (Commercial Mixed Use-1), North Fair Oaks	General Commercial Businesses (Salon and Restaurant); Parking Lot
	APN 054-261-230: 2561 El Camino Real		APN 054-261-220: Medium High Density, Commercial Mixed Use	APN 054-261-220: CMU-1 (Commercial Mixed Use-1), North Fair Oaks	
	APN 054-261-210: 11 Northumberland Avenue		APN 054-261-210: Medium High Density Residential (8.8-17.4 du/ac)	APN 054-261-210: R-3/S-5 (Multiple Family Residential District/Residential Density District 5)	

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## 2 PROJECT DESCRIPTION

The proposed 2567 El Camino Real Hotel Project (project) is an urban project that involves the development of a new hotel building at the corner of El Camino Real and Northumberland Avenue in the North Fair Oaks Community Plan Area (NFO Plan Area) of unincorporated San Mateo County, California (Figure 2-1 Regional Location). The proposed project would involve:

- Removal of the existing commercial buildings and associated site features, including pavement, fencing, shrubs, and a trash enclosure at 2567 El Camino Real, 2561 El Camino Real, and 11 Northumberland Avenue;
- Grading and excavation for the construction of the building foundation;
- Excavation and installation of new utility connections and/or upscaled utility mains along El Camino Real and/or Northumberland Avenue; and
- Construction and operation of a new 69-room hotel building with a patio garden and ground-level interior parking garage.

The construction schedule for the proposed project is not yet determined but could start in spring 2024 and last up to approximately 12 to 15 months.

### 2.1 PROJECT LOCATION AND SITE DESCRIPTION

The project site at 2567 El Camino Real, 2561 El Camino Real, and 11 Northumberland Avenue is located in the NFO Plan Area in unincorporated San Mateo County. The site consists of three parcels (APN 054-261-230, APN 054-261-220, APN 054-261-210) totaling approximately 12,487 square feet (sq. ft.) (0.32 acres). It is bounded by El Camino Real to the south/southwest, Northumberland Avenue to the east, a parcel (APN 054-261-270) zoned R-3/S-5 (Multiple Family Residential District/Residential Density District 5) to the north, a parcel (APN 054-261-280) zoned CMU-1 (Commercial Mixed Use-1, North Fair Oaks) to the west, and a parcel (APN 054-112-220)(Redwood City incorporated) zoned MUC-ECR (Mixed-Use Corridor – El Camino Real) also to the west (Figure 2-2 Project Vicinity).

The existing development at the site includes two buildings (one one-story building and one two-story building), a parking lot and driveway, six-foot-high chain link fencing, six-foot-high and eight-foot-high wood fencing, a trash enclosure and block wall, concrete sidewalks, shrubs, and utilities infrastructure (Figure 2-3 Site Photos – Looking Toward Property). The one-story building currently contains a restaurant. The two-story building contains a salon and two apartment units on the first floor of the building and two apartment units on the second floor of the building. Land uses surrounding the project site consist of a mix of development, including commercial and multi-family residential development to the east; single-family residential development immediately to the north and single-family residential, multi-family residential, and commercial development further north; commercial development to the west; and commercial development to the south.

The NFO Plan Area encompasses 798 acres of unincorporated County land bounded by the City of Redwood City to the north, west, and southwest, the Town Atherton to the east, and Menlo Park to the northeast. The project site is located in the southwestern part of the NFO Plan Area, adjacent to the City of Redwood City. The project site is also located within the El Camino Real/5<sup>th</sup> Avenue Opportunity Area, one of five “Opportunity Areas” identified by the NFO Community Plan EIR (NFO Plan EIR) as having the most potential for change under the Plan.

There is no natural habitat or water features present at or near the project site. The site consists



of buildings, hardscape, and ornamental shrubs, which would be removed during project construction.

### **2.1.1 Existing Site Access**

The project site is situated at the corner of El Camino Real and Northumberland Avenue (Figure 2-2 Project Vicinity). Vehicular access is provided via a concrete driveway off Northumberland Avenue in the northeastern portion of the project site. Pedestrian access is provided via sidewalks along El Camino Real and Northumberland Avenue. Internal circulation on site is provided by the parking lot in the northern portion of the project site.

### **2.1.2 Existing Elevation and Topography**

The project site and vicinity are generally flat with surface elevations of approximately 29 to 32 feet above mean sea level (AMSL). The project site is not located within a Federal Emergency Management Agency (FEMA)-defined Special Flood Hazard Area (SFHA) (FEMA 2019).

### **2.1.3 Existing Utilities**

The project site is served by existing water, sanitary sewer, stormwater, electrical power, natural gas, and telecommunications utilities associated with the existing commercial uses on site. All existing utility mains are located off site along El Camino Real (fire service water) and Northumberland Avenue (storm drain, sanitary sewer, and domestic water). Existing overhead electrical power and telecommunications lines are located along El Camino Real and Northumberland Avenue.

The project vicinity is served by the California Water Service (Cal Water) (potable and non-potable water supply), Redwood City (stormwater collection), the Fair Oaks Sewer Maintenance District (FOSMD) (sanitary sewer service), and the Pacific Gas and Electric Company (PG&E) (electrical power and natural gas).

## **2.2 PROJECT COMPONENTS**

The proposed project would construct a four-story hotel building with a ground level interior parking garage, landscaping, frontage improvements, and new utility connections and infrastructure (Figure 2-4 Ground Floor and Second Floor Site Plan and Figure 2-5 Third/Fourth Floor and Roof Plan). The proposed building would consist of one (1) floor of parking garage plus hotel lobby and lounge area and three (3) floors of guest rooms. The parking garage would be located partially below the second through fourth floors of the building and partially exposed (i.e., not located below upper portions of the building).

### **2.2.1 Project Construction**

Project construction could commence in spring 2024 and would occur over a period of approximately 12 to 15 months. Construction staging is anticipated to be located within the footprint of the existing commercial buildings and in the location of the proposed parking garage entrance; the construction staging area would be accessed from Northumberland Avenue. Approximately 79 cubic yards (CY) of cut and 172 CY of fill are proposed to demolish the existing buildings and hardscape, grade for the new building and driveway, excavate the bio-retention areas, and improve the lot frontage (Figure 2-8 Grading Plan). All cut material would be hauled off site.

## **2.2.2 On- and Off-Site Utility Improvements**

New utility laterals and connections for fire water service, potable and non-potable (including irrigation) water, sanitary sewer, storm drain, electrical power, natural gas, and telecommunications would be installed to connect the project site and proposed building to the utility main lines along El Camino Real and Northumberland Avenue (Figure 2-9 Utility Plan).

Stormwater collection improvements would include roof drains, a self-treating area with permeable pavement, a self-retaining area with permeable pavement, on-site and off-site storm drain pipes connecting the self-retaining area to an existing off-site storm drain manhole on Northumberland Avenue, two bioretention areas, a catch basin installed in the bioretention area proposed in the northwest corner of the site, a catch basin/pump station installed in the bioretention area nearest the City's storm drain main on Northumberland Avenue, and an on-site/off-site retention pipe directing runoff from the bioretention areas to the City's storm drain system. The two bioretention areas (measuring 232 sq. ft. and 360 sq. ft.) would be constructed along the northern property line to collect on-site runoff, which would be treated on site before being conveyed to the storm drain main on Northumberland Avenue through the new storm drain lateral (Figure 2-10 Stormwater Treatment Plan). The self-retaining area, measuring 561 sq. ft., would be constructed at the hotel building pedestrian entrance and topped with a permeable pavement. The self-treating area, measuring 370 sq. ft. and topped with permeable pavement, would be located along the southern building frontage and serve as a portion of the sidewalk on El Camino Real.

New water supply laterals would connect the water supply main along Northumberland Avenue to the project site and proposed building to provide domestic water to the guest rooms and building amenities and to provide irrigation water for the site landscaping. A new fire water service lateral would connect one new fire hydrant to a water main line along El Camino Real. The project would abandon an existing water line off of El Camino Real.

A new sanitary sewer lateral would connect the project building to the sanitary sewer main located along Northumberland Avenue. According to the Fair Oaks Sewer District, although there is sufficient sewer capacity to serve the proposed project, the project would be required to replace approximately 400-1,000 linear feet of pipes within the Sewer District (North Fair Oaks Community Council 2022).

Existing overhead powerlines serving the project site would be undergrounded per the request of the Menlo Park Fire Protection District (MPFPD).

## **2.2.3 Proposed Residential Building Description and Features**

The proposed 69-room hotel building would consist of three (3) stories of hotel guestrooms over one (1) floor of partially exposed parking garage and the hotel lobby and lounge area (Figure 2-4 Ground Floor and Second Floor Site Plan and Figure 2-5 Third/Fourth Floor and Roof Plan). The proposed building would total 18,715 sq. ft. of gross floor area (all floor space aggregated). The project would incorporate amenities such as a lounge area and 745-sq.ft. podium-level, open air patio garden. Amenities would be secured and available only for private use.

### **2.2.3.1 Layout and Facilities**

The new building layout would include the following rooms and areas:

- Floor 1 (patio entry): Pedestrian entry, bicycle parking, exterior stairwell.
- Floor 1 (non-parking): Hotel lobby, lounge area, elevator vestibule, restroom, trash room, electrical and mechanical equipment room, and two stairwells.

- Floor 1 (partially exposed parking garage): Vehicle parking spaces, including electrical vehicle parking, clean air vehicle parking, ADA-accessible parking, and valet parking.
- Floor 2: Hotel guestrooms, service areas, elevator vestibule, two interior stairwells, one exterior stairwell, open-air patio garden, and podium-level landscaping.
- Floor 3 and 4: Hotel guestrooms, elevator vestibule, electrical and mechanical equipment room, service area, and two stairwells.
- Roof: Mechanical equipment, stairwell penthouse, and elevator vestibule.

All common use and public areas would be accessible per the requirements of the 2019 California Building Code (CBC) or the code in effect at the time of issuance of building permit(s).

### **2.2.3.2 Amenities**

The proposed project would include a podium-level, open-air, 745-sq. ft. patio garden and an additional landscaped area with planters, both of which would be accessed from the second floor of the building, and a lounge area at the ground-level entrance to the building.

### **2.2.3.3 Building Design**

The proposed hotel building would measure 48 feet tall from grade to the top of the roof; rooftop walls to screen mechanical equipment and the elevator vestibule/stairwell penthouse would exceed the height of the roof, measuring 48 to 50 feet from grade (Figure 2-6 Building Elevations). The exterior design of the building would utilize varying roof heights, window sizes (fenestration), colors, and natural material choices to articulate the façade and break up parts of the building to appear less linear. The building design uses large vertical elements with differing heights and materials to break up the massing of the building (Figure 2-7 Building Perspectives).

Per County Code requirements, the project would provide at least 10-foot-wide sidewalks along El Camino Real, measured from back of curb, and at least 8-foot-wide sidewalks on Northumberland Avenue, measured from back of curb. The project proposes sidewalks measuring 11 feet, 8<sup>3/8</sup> inches measured from back of curb to the hotel building along Northumberland Avenue and sidewalks measuring approximately 12 feet, 2 inches from back of curb to the hotel building along El Camino Real. The project proposes a rear setback (measured from closest point of the building to the property line) varying from 15 feet to 22 feet for the portion of building above 25 feet along the northern property line (Figure 2-4 Ground Floor and Second Floor Site Plan). The project proposes a front setback (measured from the closest point of the building to the property line) along El Camino Real that measures 7 feet, 11<sup>3/4</sup> inches along the southern property line. The project proposes side setbacks of zero feet along the western property line and two feet along the eastern property line on Northumberland Avenue.

### **2.2.3.4 Landscaping**

The proposed project would include landscaping and frontage improvements (Figure 2-4 Ground Floor and Second Floor Site Plan). Landscaping improvements would include raised street trees planted along El Camino Real and Northumberland Avenue, a narrow, landscaped strip between the building and the sidewalk along Northumberland Avenue, two landscaped bioretention areas (one located in the northeastern corner of the property and one located in the northwestern corner of the property), planter boxes in the patio garden and a second, podium-level landscaped area along the southern building frontage, and a six-foot masonry wall that would run along the rear property line and a portion of the eastern property line to screen the project from adjacent multi-family residential parcels. The project would replace existing concrete sidewalks, curbs, and gutters along El Camino Real and Northumberland Avenue with

new concrete sidewalks, curbs, and gutters. The project would install permeable pavement at the ground-level entry into the hotel building and along the southern building frontage along El Camino Real. Bike racks would be installed in the patio at the ground-level hotel entrance.

## **2.2.4 Access, Circulation, and Parking**

The proposed project includes one new driveway that would provide vehicular ingress and egress via Northumberland Avenue (Figure 2-4 Ground Floor and Second Floor Site Plan). The new Northumberland Avenue driveway would lead directly into the ground-level parking garage. The existing driveway in the northwestern portion of the project site off Northumberland Avenue would be removed. The new driveway would provide guest and employee access to the building's parking garage. Vehicle circulation throughout the site would be limited to the ground-level parking garage, as the proposed building would occupy the majority of the project site. In addition, a new wheelchair ramp would be constructed at the corner of El Camino Real and Northumberland Avenue.

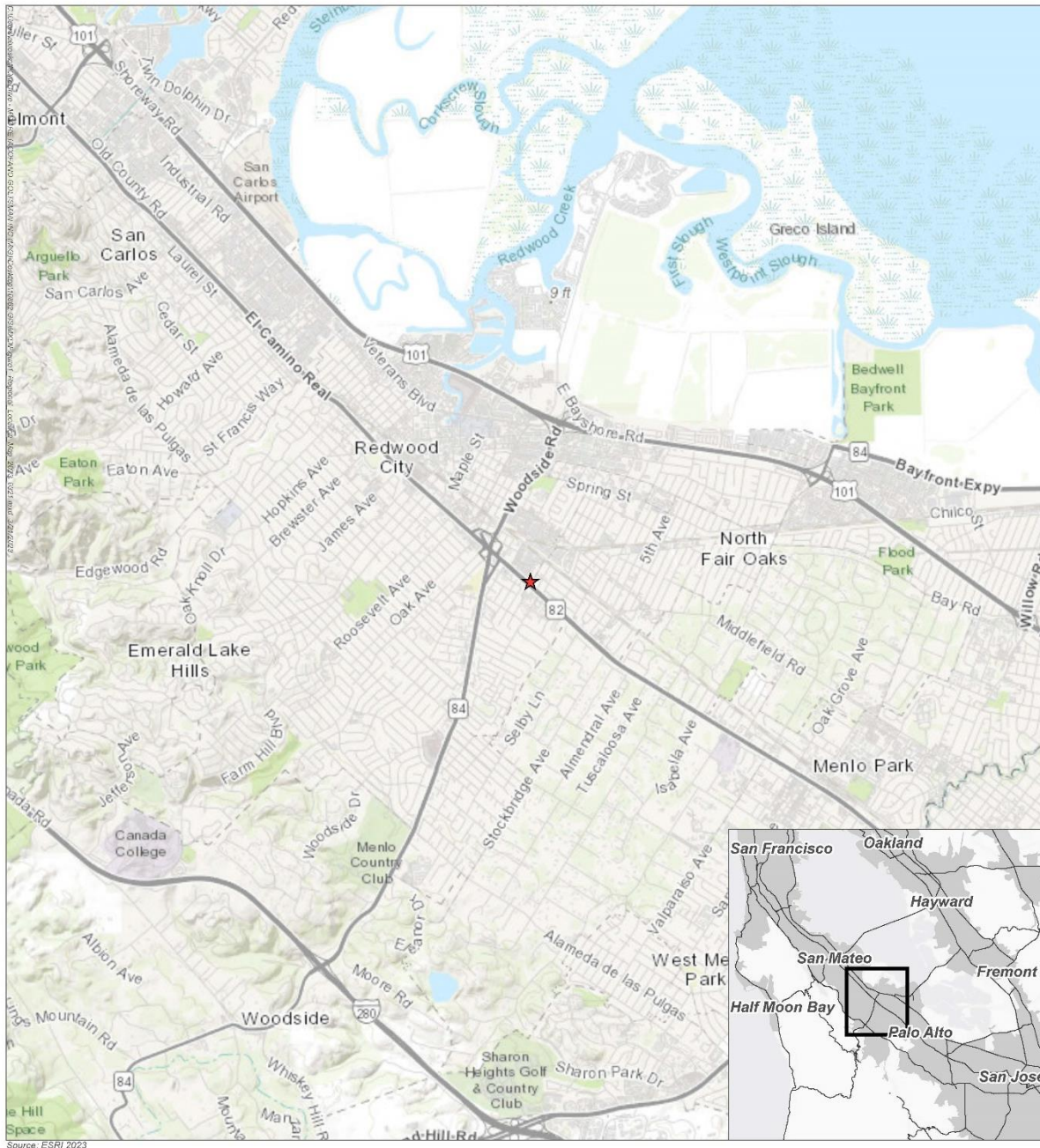
As discussed above, the proposed building would contain a ground-level parking garage, a portion of which would be enclosed within the building and a portion of which would be "exposed" (i.e., not located underneath upper floors of the building). Parking spaces located on what is now parcel APN 054-261-210 would be maintained as a parking lot with car lifts. The parking garage would contain a total of 48 vehicle parking spaces, including four clean air vehicle spaces, four electrical vehicle charge spaces, two Americans with Disabilities Act (ADA)-accessible spaces, and eight valet spaces. All parking spaces except for the ADA accessible spaces would be car lift spaces to meet the CMU-1 district's parking requirements. The project would also provide racks for 10 bicycles in the building entry patio.

Emergency access to the building would be provided along El Camino Real and Northumberland Avenue. A new fire hydrant would be installed on the sidewalk along El Camino Real. The building would be fully protected with an automatic fire sprinkler system per County Fire Code requirements.

## **2.3 POTENTIAL PROJECT PERMITS AND APPROVALS**

The project would require the following actions by the County and other agencies:

- San Mateo County Use Permit;
- San Mateo County Zoning Amendment and General Plan Amendment;
- San Mateo County Building Permit(s);
- San Mateo County Grading Permit for approximately 251 CY of grading (79 CY of cut and 172 CY of fill);
- San Mateo County Design Review approval;
- San Mateo County Encroachment Permit for work (e.g., sanitary sewer, water, storm drain, electrical power, natural gas, and telecommunications) in the public ROW;
- Fair Oaks Sewer Maintenance District (sewer connection permits/authorizations); and
- California Water Service Company (water system improvements).



★ Project Location

0 0.5 1 2 Miles



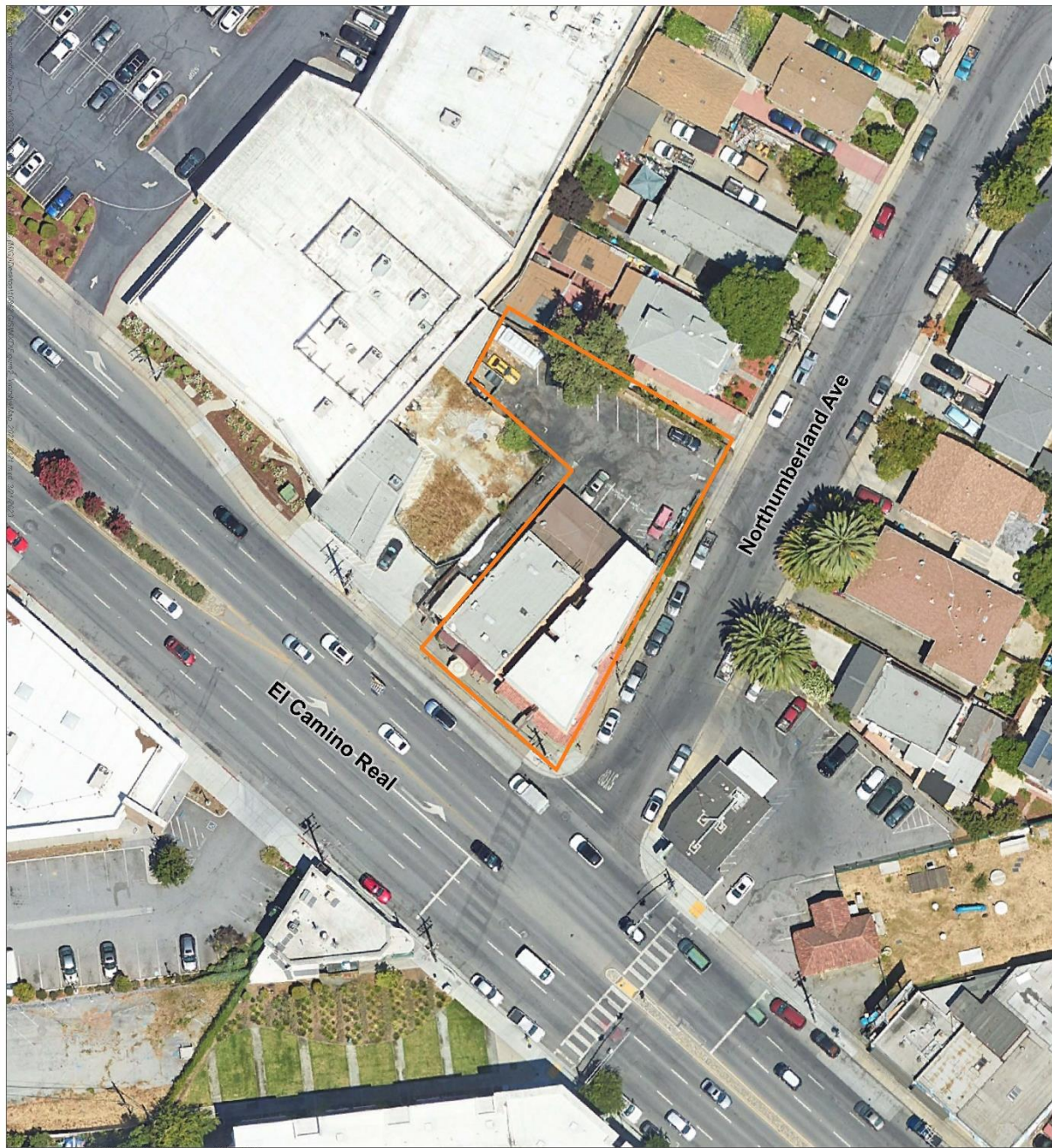
**Figure 2-1 Regional Location**

2567 El Camino Real Hotel Project NFO Plan EIR Consistency Analysis



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Source: Google Earth 4/5/2022; SMC Assessors Office 2023

 Project Site



**Figure 2-2 Project Vicinity**

2567 El Camino Real Hotel Project NFO Plan EIR Consistency Analysis

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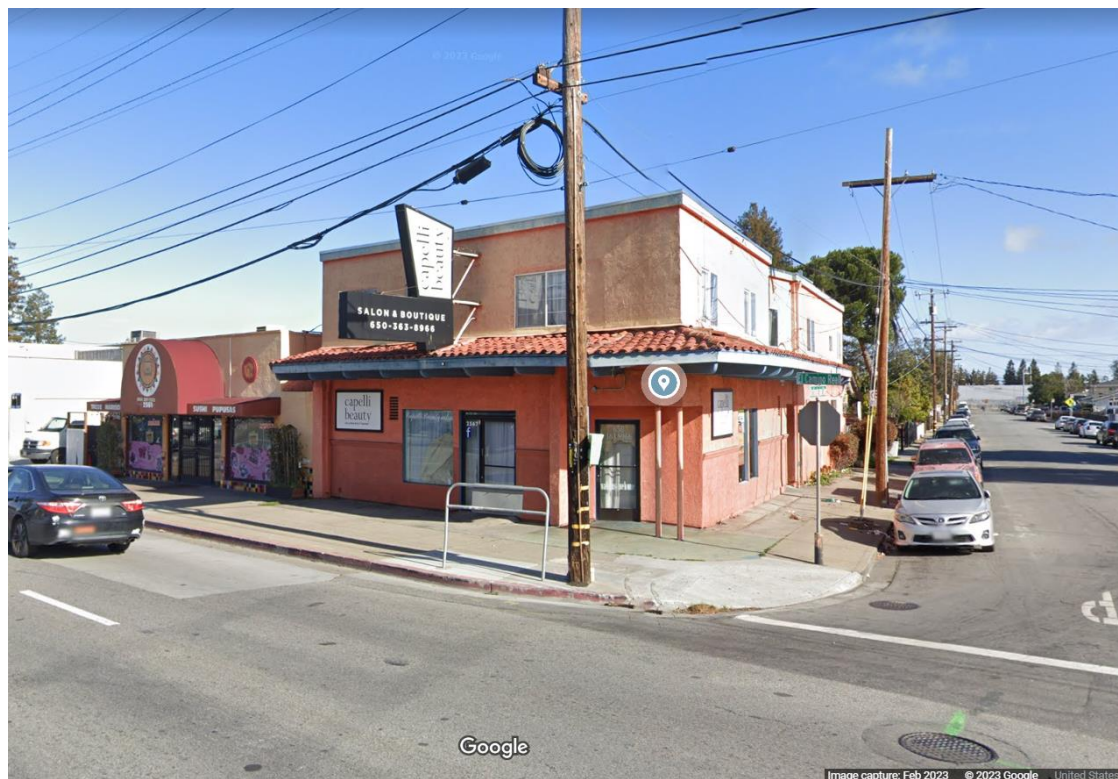
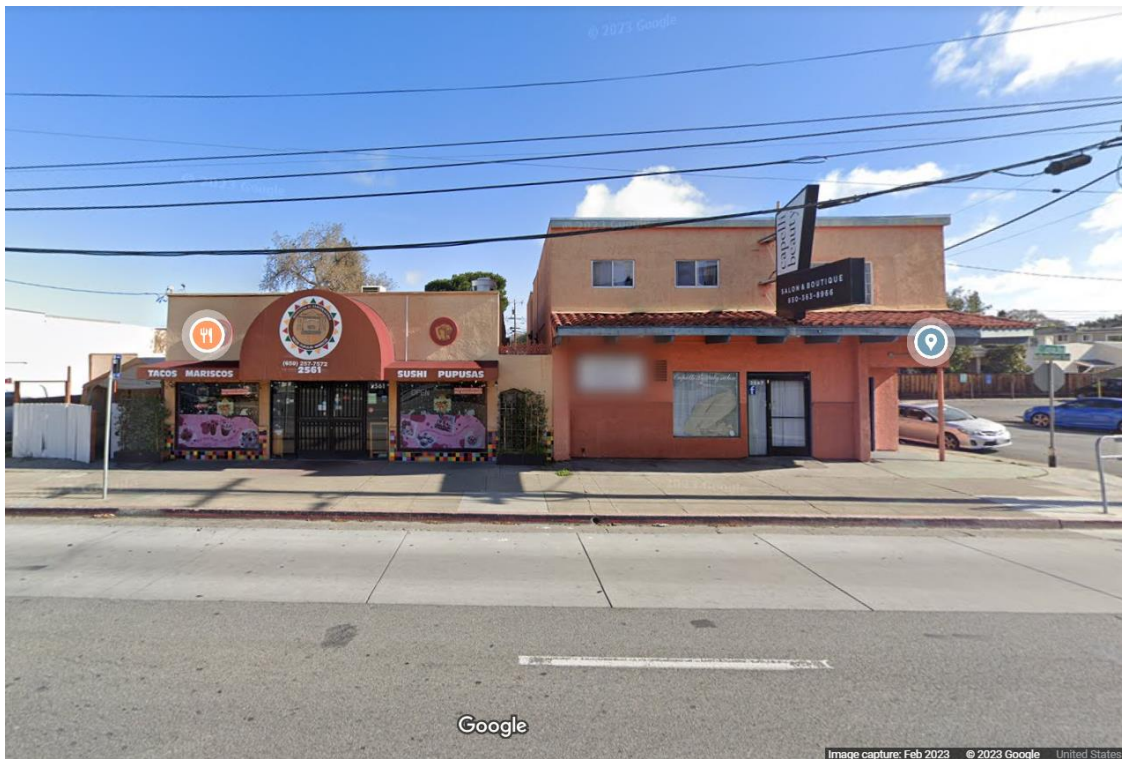
**Figure 2-3 Site Photos – Looking Toward Property**

Figure 2-3. Top (Photo 1): View of project site from El Camino Real, looking northeast (Google Maps 2023). Bottom (Photo 2): View of project site from intersection of El Camino Real and Northumberland Avenue, looking north (Google Maps 2023).



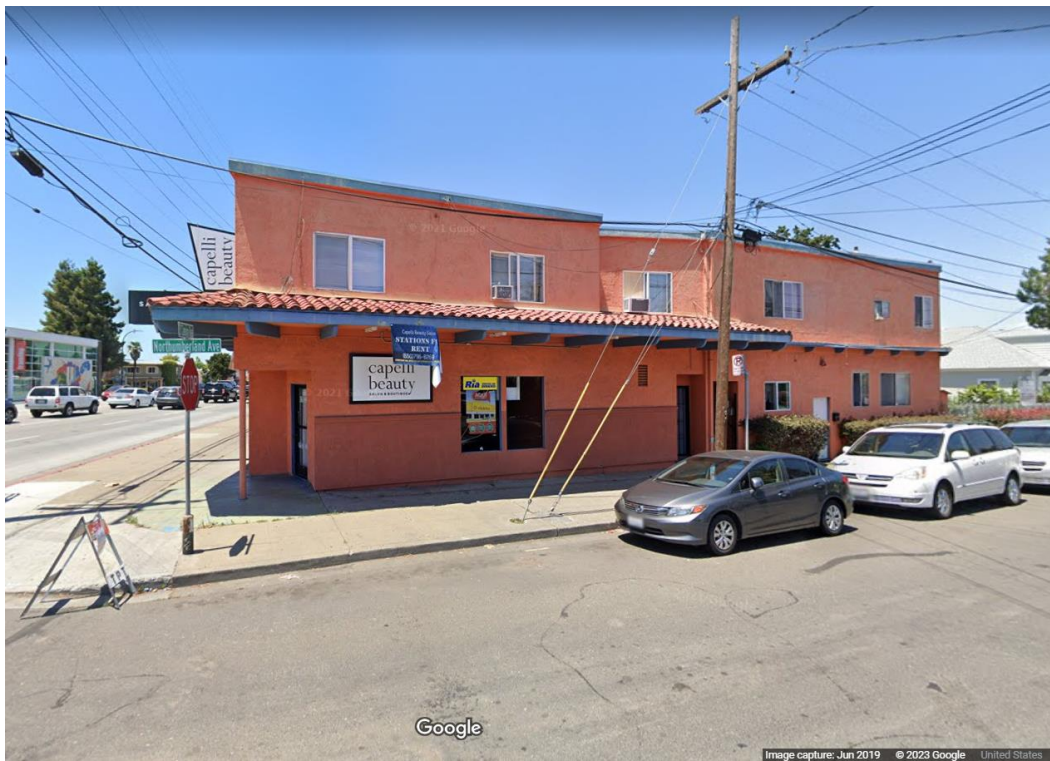
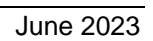
**Figure 2-3 Site Photos – Looking Toward Property**

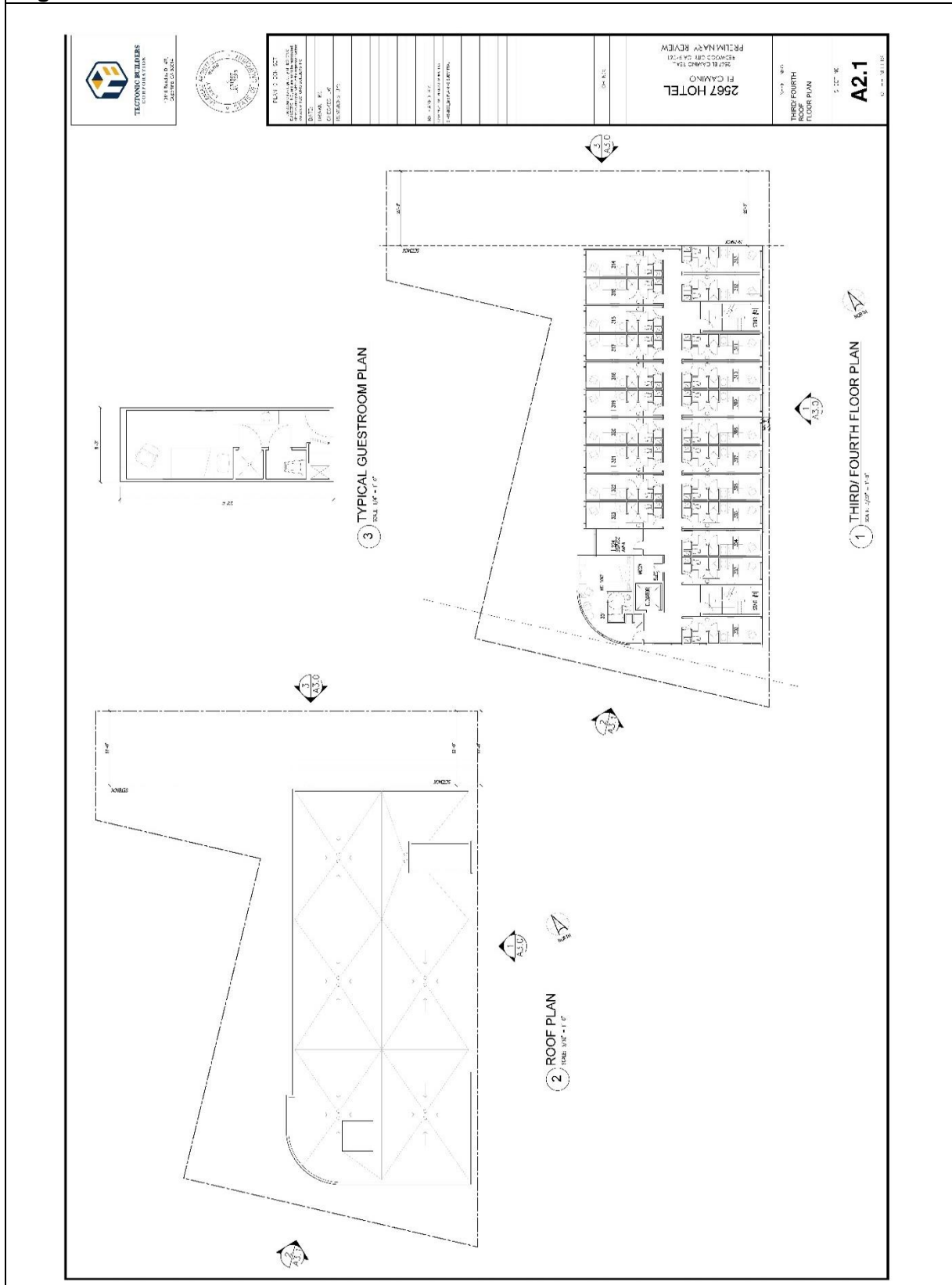
Figure 2-3. Top (Photo 3): View of project site from Northumberland Avenue, looking northwest (Google Maps 2019). Bottom (Photo 4): View of project site from Northumberland Avenue, looking west (Google Maps 2022).

NFO Plan EIR Consistency Analysis  
2567 El Camino Real Hotel Project



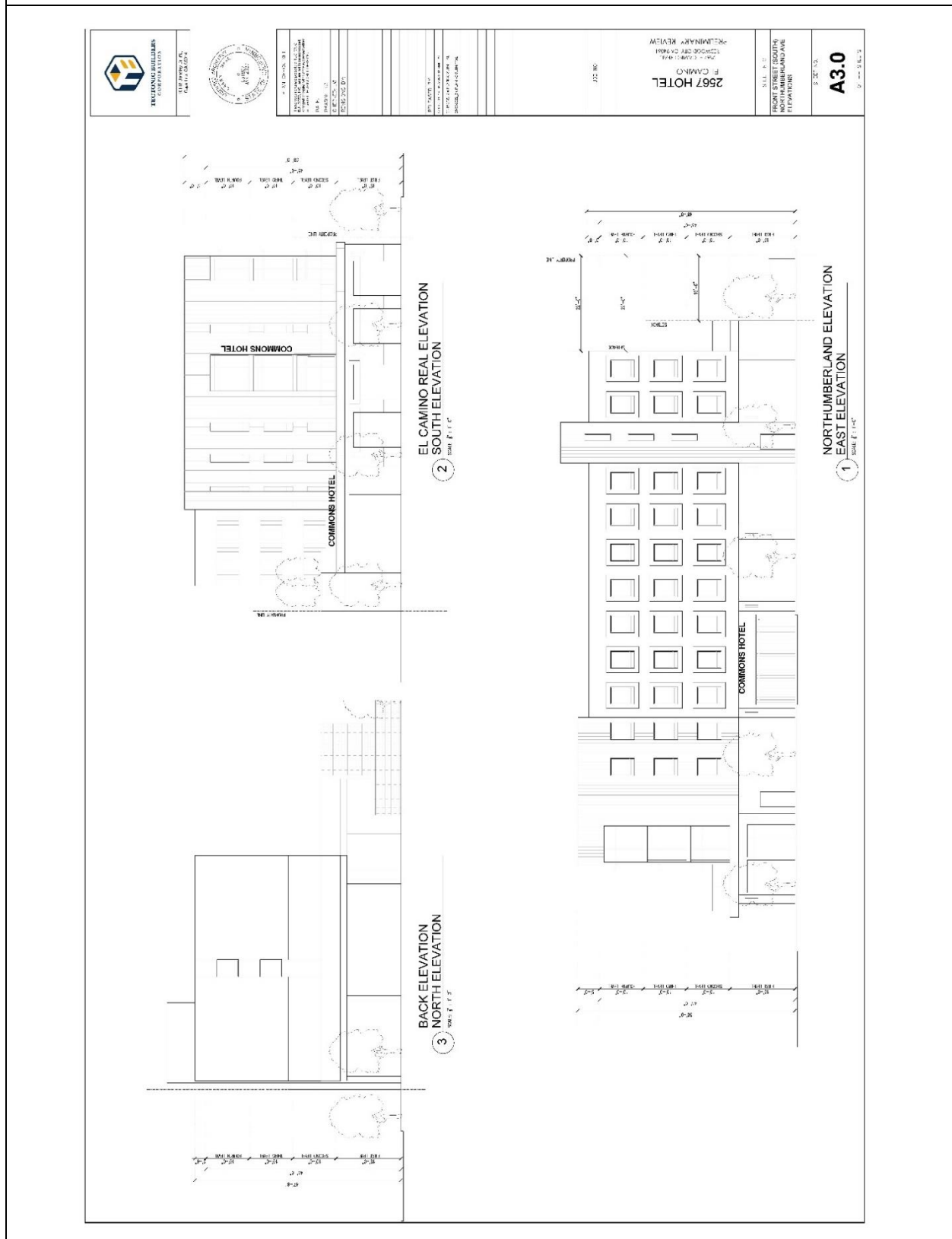
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**Figure 2-5 Third/Fourth Floor and Roof Plan**



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### Figure 2-6 Building Elevations



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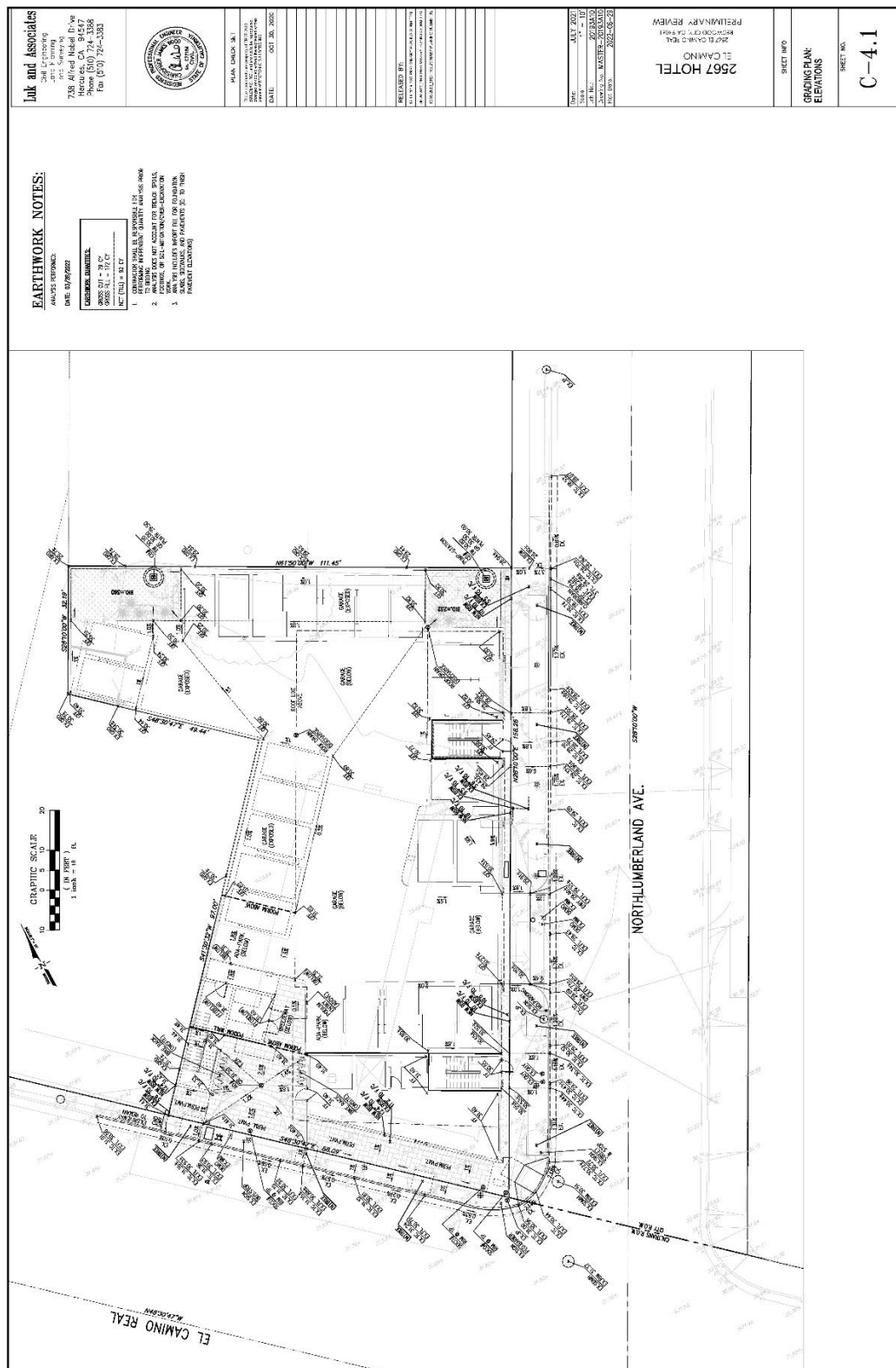


**Figure 2-7 Building Perspectives**



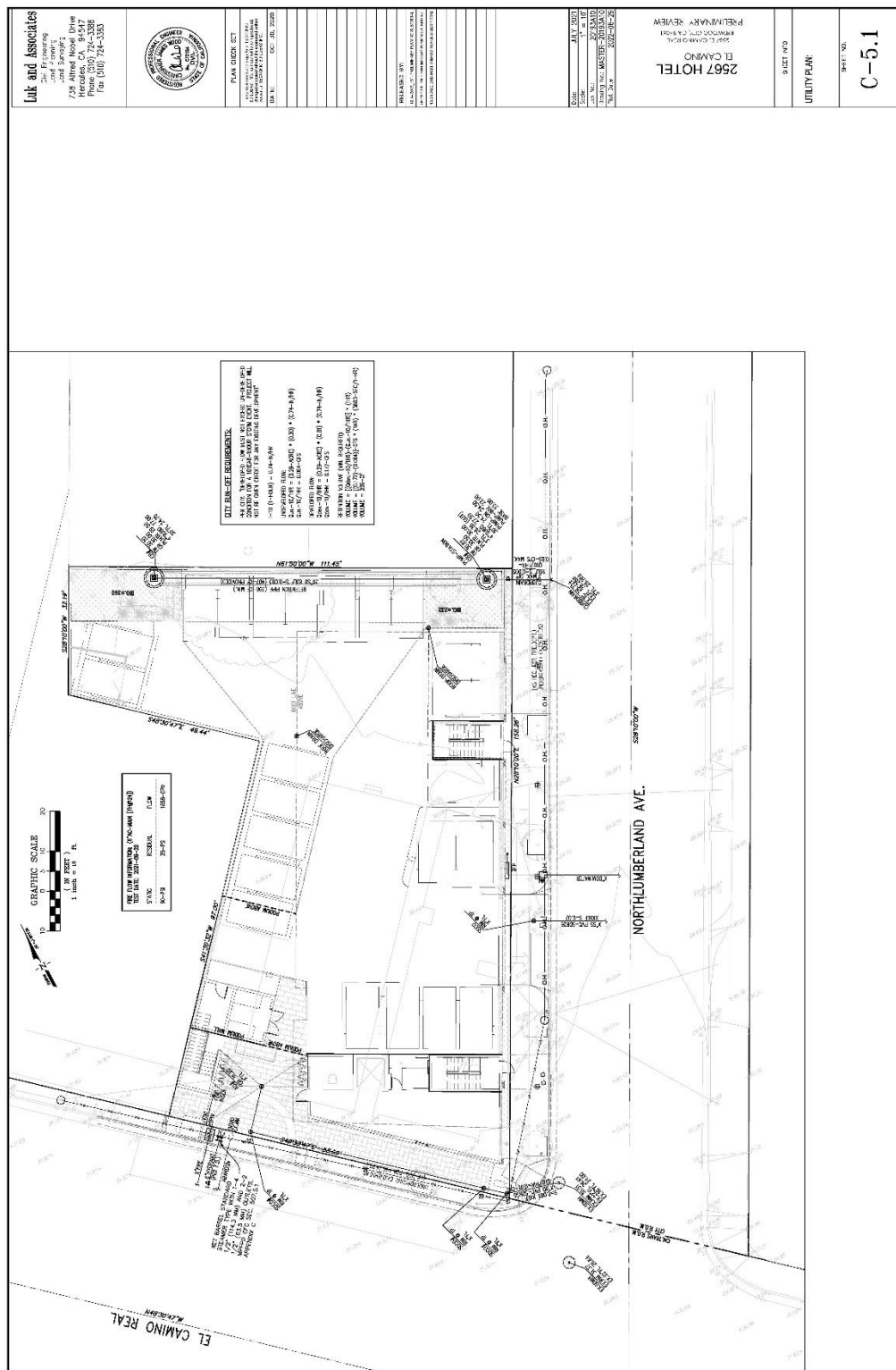
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### Figure 2-8 Grading Plan



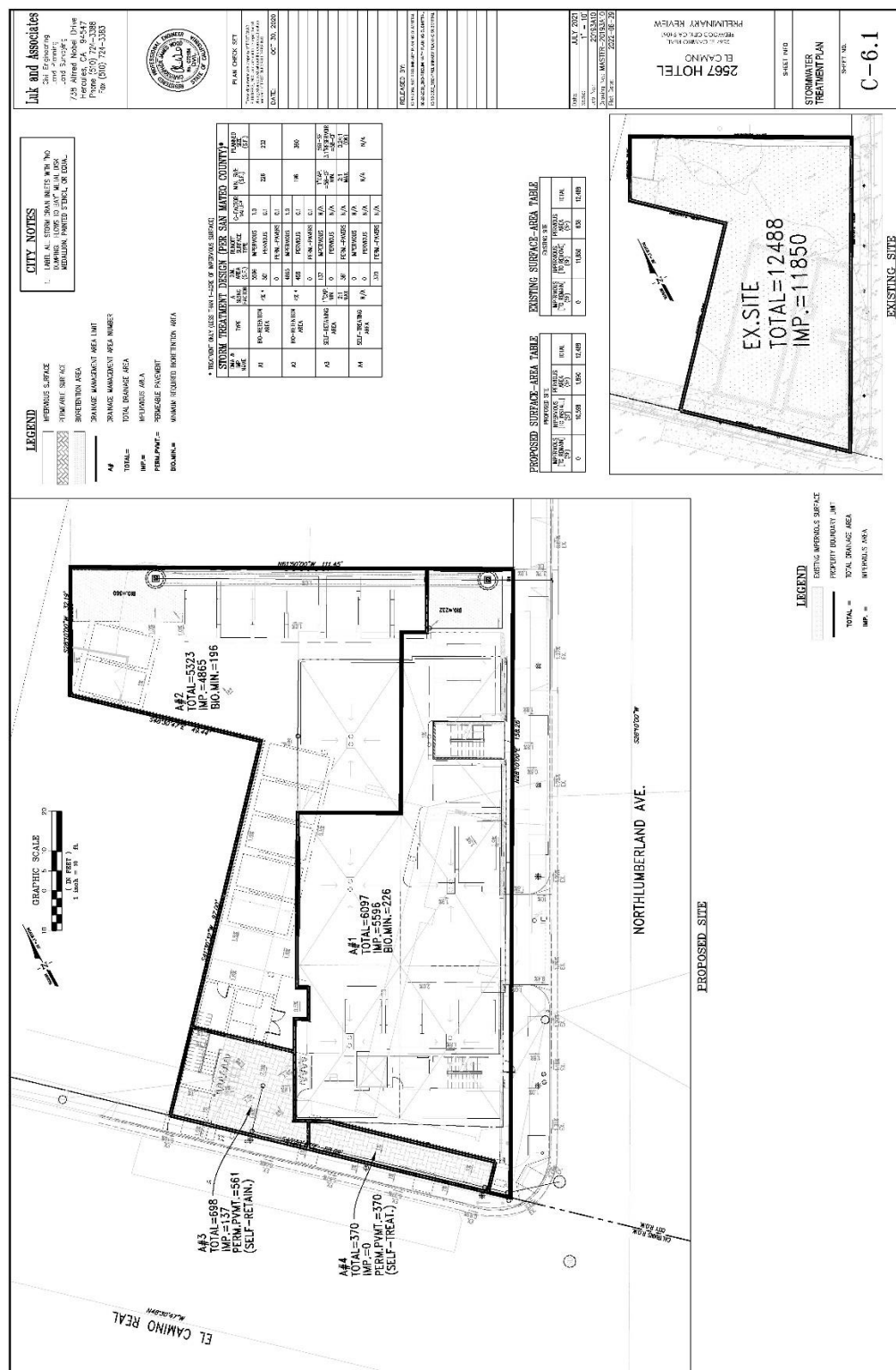
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### Figure 2-9 Utility Plan



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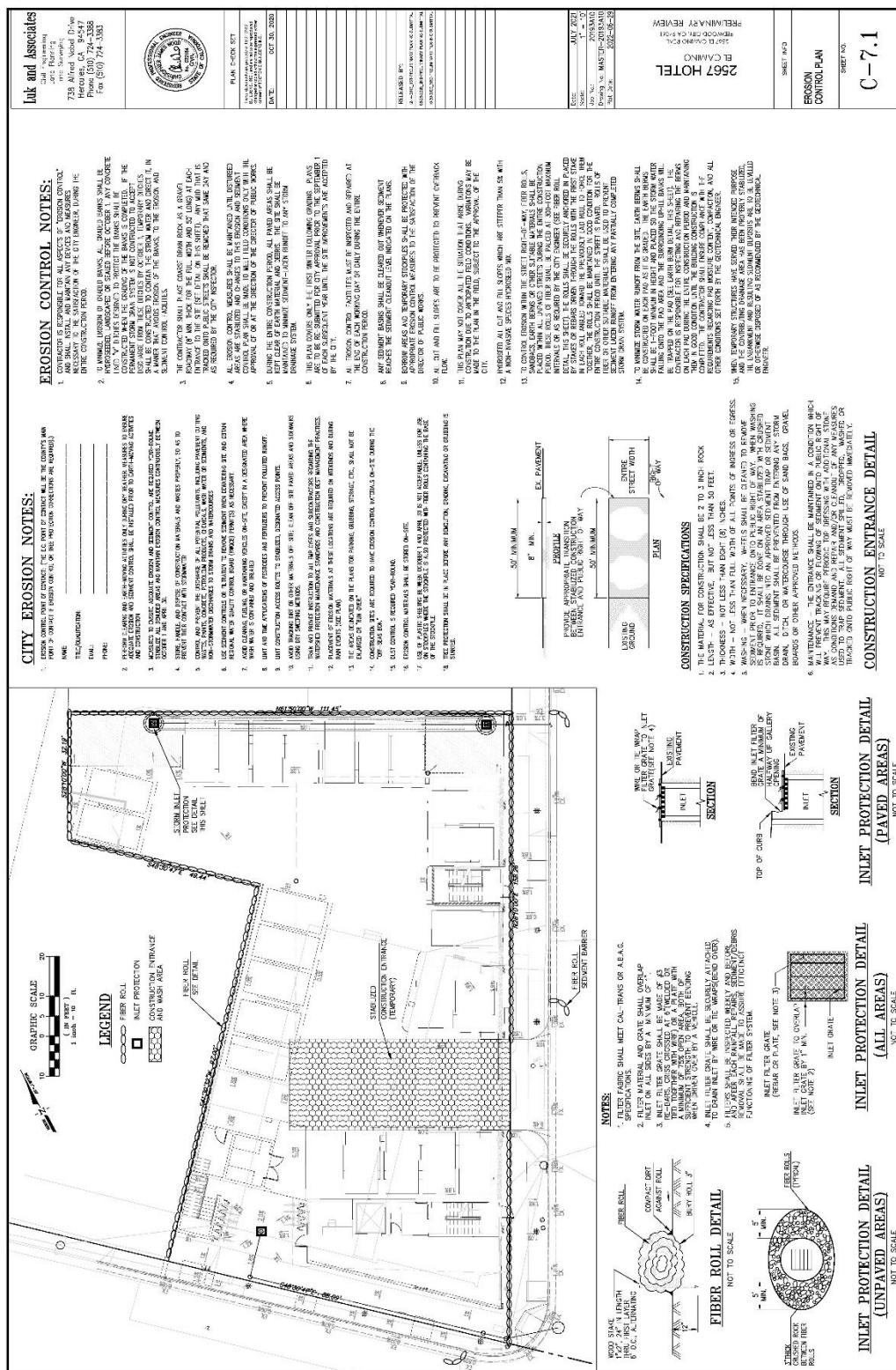
### Figure 2-10 Stormwater Treatment Plan



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### Figure 2-11 Erosion Control Plan



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### **3 SUPPLEMENTAL ENVIRONMENTAL REVIEW METHODOLOGY**

#### **3.1 NFO PLAN EIR BACKGROUND**

The North Fair Oaks Community Plan (NFO Plan) was first adopted in 1979. In 2011, the County adopted an update to the original plan and certified an EIR for the updated plan. The 2011 NFO Plan EIR was prepared at the program, “first-tier” level of environmental review consistent with California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15168 (County of San Mateo 2011). The program-level analysis considered the broad environmental impacts of the overall NFO Plan.

#### **3.2 PROGRAM EIR USE WITH LATER ACTIVITIES**

In accordance with CEQA Guidelines Section 15168(c), the County must examine proposed activities and projects within the NFO Plan Area to determine whether additional environmental documentation is required. Pursuant to CEQA Guidelines Section 15168(c)(1), if the County determines a proposed activity or project would have effects that were not examined in the NFO Plan EIR, the County could need to evaluate the potential impacts of that activity under Public Resources Code Section 21166, which only requires subsequent CEQA review in certain circumstances. If, however, the County determines, pursuant to CEQA Guidelines Section 15168(c)(2), that the proposed activity or project is within the scope of the scope of the NFO Plan EIR, no further CEQA would be required.

CEQA Guidelines Section 15162(a) sets forth that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of the previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR;
  - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant

effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

For projects proposed within the NFO Plan Area, such as the proposed project, the County must evaluate the entitlements/actions to determine if the project falls within the scope of the certified NFO Plan EIR and incorporates all applicable performance standards and mitigation measures identified therein or results in any of the conditions in CEQA Guidelines Section 15162(a) enumerated above. Pursuant to CEQA Guidelines Sections 15162 through 15164, additional environmental review through the subsequent review provisions of CEQA for changes to previously reviewed and approved projects may be warranted.

### **3.3 ENVIRONMENTAL REVIEW PROCESS AND FINDINGS**

Pursuant to CEQA Guidelines Section 15162(a), MIG, Inc., has reviewed the proposed project and the certified NFO Plan EIR to determine:

- 1) The extent to which the proposed project impacts has been addressed by the previously certified NFO Plan EIR.
- 2) Whether the proposed project could involve changes to the NFO Plan that create new significant or substantially more severe significant project impacts.
- 3) Whether new circumstances or new information create new significant or substantially more severe significant impacts or require new analysis beyond that identified in the NFO Plan EIR.
- 4) Whether any identified new significant or substantially more severe significant impacts are adequately addressed by previously approved project mitigation.

As described in Chapter 4, Environmental Checklist, of this document, the proposed project would result in similar environmental impacts as those described in the certified NFO Plan EIR. The project would not result in new significant environmental impacts or substantially more severe previously identified significant impacts. Therefore, the proposed project is within the scope of the NFO Plan EIR and does not require preparation of a subsequent EIR or Mitigated Negative Declaration. A description of the environmental checklist used to reach this determination is provided in Section 3.4, below.

#### **3.3.1 Proposed Project Impacts**

The proposed project, as described in Chapter 2, would not result in new significant impacts or substantially more severe significant impacts. The environmental impacts associated with the project would remain substantially the same as, or less than, the levels described in the certified NFO Plan EIR. No new mitigation is required for the project. A full discussion of the proposed project's potential environmental effects is presented in Chapter 4.

#### **3.3.2 Changes in Circumstances**

There are no changed circumstances involving new significant impacts or substantially more severe significant impacts. No substantial changes to baseline conditions used in the NFO Plan EIR have been identified. As a result, the impacts of the proposed project are within the scope of the certified EIR as documented in Chapter 4.

#### **3.3.3 New Information**

New information has been made available since certification of the NFO Plan EIR in the form of revised CEQA Guidelines and a revised Appendix G Environmental Checklist Form. Most recently, the State Office of Planning and Research (OPR) amended the checklist on December 28, 2018, and San Mateo County subsequently updated its Initial Study Environmental Evaluation Checklist to reflect the revised Appendix G checklist. The updated County checklist is presented in Chapter 4. For ease of reference and consistency with the 2011 EIR, the checklist presented in Chapter 4 also includes the environmental review questions from the 2011 NFO Plan EIR. Refer to Appendix B for a summary of the most recent changes to the County's environmental checklist.

In addition, as described in Chapter 4, several new County and regional plans have been adopted since certification of the NFO Plan EIR, such as the Bay Area Air Quality Management District's 2017 Clean Air Plan.

The revised environmental checklist and other new information does not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts, nor does it alter the feasibility of mitigation or alternatives previously considered in the certified EIR. There is no other new information that requires the evaluation of new mitigation measures or alternatives to the NFO Plan EIR.

### **3.3.4 Adequacy of EIR Mitigation**

The proposed project does not result in new significant environmental impacts that have not been previously disclosed in the certified NFO Plan EIR. The certified EIR mitigation measures remain adequate to fully address the proposed project's potential adverse environmental effects. No new mitigation is required for the project.

## **3.4 ENVIRONMENTAL CHECKLIST EVALUATION CATEGORIES**

The purpose of the environmental checklist presented in Chapter 4 is to evaluate whether any of the criteria enumerated in CEQA Guidelines Section 15162(a) requiring the preparation of a subsequent EIR are applicable to the proposed project (i.e., changed circumstances, project changes, or new information of substantial importance that may result in a new or substantially more severe significant impact than identified in the NFO Plan EIR; see Section 3.2). The checklist used in this Consistency Analysis was obtained from the County and represents the County's most recent CEQA Guidelines Appendix G checklist. The row titles of the checklist include the full range of environmental topics as presented in Appendix G of the State CEQA Guidelines, with some modifications made by the County. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact because it was analyzed and addressed with mitigation measures (if necessary) in the certified NFO Plan EIR. For instance, the environmental categories might be answered with a "no" in the checklist because the impacts associated with the project were adequately addressed in the EIR, and the environmental impact significance conclusions of the EIR remain unchanged.

The purpose of each column of the checklist is described below.

*“Where Impact was Analyzed”*

This column provides a cross-reference to the pages of the NFO Plan EIR where information and analysis may be found relative to the environmental issue listed under each topic.

*“Do Proposed Changes Involve New Significant Impacts?”*

This column indicates the significance of the environmental impacts of the project-specific features not considered in the NFO Plan and its EIR (e.g., a specific off-site intersection improvement).

*“Any New Circumstances Involving New or Substantially More Severe Significant Impacts?”*

Pursuant to CEQA Guidelines Section 15162(a)(2), this column indicates whether there have been changes to the project site or the vicinity (the circumstances under which the project would be undertaken) that have occurred subsequent to the prior environmental documents, which would result in the current project having new significant environmental impacts that were not considered in the prior environmental documents or having substantial increases in the severity of previously identified significant impacts.

Neither CEQA nor the CEQA Guidelines define the term “substantial”; however, CEQA Guidelines Section 15382 defines the term “significant effect on the environment” as:

. . . a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

*“Any New Information Requiring New Analysis or Verification?”*

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified as complete is available, requiring an update to the analysis of the EIR to verify that the environmental conclusions and mitigation measures remain valid. If the new information shows that: (A) the project will have one or more significant effects not discussed in the prior environmental documents; (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, the question would be answered “yes,” requiring the preparation of a subsequent EIR or supplement to the EIR (CEQA Guidelines Section 15163). However, if the additional analysis completed as part of the environmental checklist review finds that the conclusions of the prior environmental document remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered “no” and no additional EIR documentation (subsequent EIR or supplement to the EIR) would be required. Any project-specific studies or reports are listed in this column.

Notably, where the only basis for preparing a subsequent EIR or a supplement to an EIR is a new significant impact or a substantial increase in the severity of a previously identified significant impact, a new EIR might be unnecessary if the project applicant agrees to one or more mitigation measures that can reduce the significant effect(s) at issue to less than significant levels. (See *River Valley Preservation Project v. Metropolitan Transit Development Board* [1995] 37 Cal.App.4th 154, 168.)

*“Do Prior Environmental Documents’ Mitigations Address/Resolve Impacts?”*

This column indicates whether the prior environmental documents and adopted CEQA Findings provide mitigation measures to address effects in the related impact category. In some cases, the mitigation measures have already been implemented. A “yes” response will be provided in either instance. If “NA” is indicated, the environmental checklist review concludes that there was no impact, or the impact was less than significant and, therefore, no mitigation measures are needed.

### **3.5 DISCUSSION AND MITIGATION SECTIONS**

To clarify the answers, a discussion of the checklist issues is provided under each environmental category. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

In addition, applicable mitigation measures from the NFO Plan EIR that would apply to the proposed project are included in the Mitigation Monitoring and Report Program (MMRP) attached as Appendix A to this Consistency Analysis document.

Finally, a discussion and conclusion regarding the need for additional environmental documentation is contained in each section.

## 4 ENVIRONMENTAL CHECKLIST

### 4.1 AESTHETICS

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>1. Aesthetics. Would the project:</b>				
a. Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?	NFO Plan EIR, p. 4-15.	No	No	NA
b. Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Scoped out at Notice of Preparation stage.  There are no designated State Scenic Highways in, adjacent to, or near the NFO Plan Area.	No	No	NA
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	NFO Plan EIR, pp. 4-14 to 4-15.	No	No	NA
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	NFO Plan EIR, p. 4-16.	No	No	NA



e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?	Scoped out at Notice of Preparation stage.  There are no designated State Scenic Highways in, adjacent to, or near the NFO Plan Area.	No	No	NA
f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
g. Visually intrude into an area having natural scenic qualities?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
h. Cast shadow that substantially impairs the beneficial use, important values, or livability of any shadow-sensitive use, including public parks, plazas, or open spaces areas, or shadow-sensitive portions of residential parcels? <i>(Note: This question is no longer part of the County's environmental review checklist).</i>	NFO Plan EIR, p. 4-16.	No	No	NA

### 4.1.1 Discussion

#### Would the project:

#### a) Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts to scenic vistas (EIR, p. 4-15). The analysis noted that there are no officially designated scenic vistas within North Fair Oaks and, therefore, no scenic vistas or view corridors would be substantially obstructed or degraded by future development in accordance with the NFO Plan. The NFO Plan EIR concluded that the impacts of the NFO Plan on scenic vistas would be less than significant.

The County Zoning Regulations allow for a maximum building height of 60 feet and a three-story minimum in the Commercial Mixed Use-1 (CMU-1) District (San Mateo County Zoning Regulations Chapter 29.1 CMU-1 District, Section 6567.4). At four (4) stories above grade and reaching a top of roof height of 48 feet along both El Camino Real and Northumberland Avenue, the proposed hotel building would meet the maximum building height and building story regulations of the NFO Plan and CMU-1 District. Refer to Table 4-1 in Section 4.1.1 f) for a description of the proposed project's consistency with other CMU-1 District Development

Standards.

In conclusion, the project would be consistent with the development standards of the CMU-1 Zoning District and the Commercial Mixed Use (Medium High Density) land use designation under the NFO Plan and would not result in a substantial adverse effect on a scenic vista.

**b) Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

Impacts to scenic resources were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The project would redevelop an already developed site that contains no scenic resources. As such, the development of the project would not damage or destroy any scenic resource.

Regarding the project's impacts on trees, see the discussion in Section 4.4, Biological Resources.

Regarding the project's impacts to historic buildings, see the discussion in Section 4.5, Cultural Resources.

**c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

The NFO Plan EIR evaluated whether the implementation of the NFO Plan would result in impacts on visual character and quality (EIR, pp. 4-14 to 4-15). The analysis noted that the NFO Plan would promote a more appealing and coherent visual character in the Plan Area. Policies under the Plan would enhance the visual character and quality of the community (e.g., "complete streets" standards, street design guidelines, and expansion of street canopy). Intensification and redevelopment of underutilized properties would result in a more unified and coherent development character, thereby improving the quality of both internal and external views of the Plan Area. Proposed building heights, design regulations and guidelines, and streetscape improvements would ultimately improve the visual quality and character of the Plan Area. Under the NFO Plan, building height and setback guidelines would orient higher intensities toward non-residential corridors and away from public spaces and existing smaller scale residential development. Thus, the Plan would harmonize large scale buildings along mixed-use corridors with existing smaller scale buildings along adjoining local streets by stepping down building heights or providing setbacks. The NFO Plan EIR concluded the impacts of the NFO Plan on visual character and quality would be less than significant.

At four (4) stories above grade along El Camino Real and Northumberland Avenue, the project meets the maximum building height and building story regulations of the NFO Plan and CMU-1 District for the project parcel (i.e., maximum 60 feet building height and minimum of three stories). The project is consistent with setback regulations of the NFO Plan (see Section 4.1.1 a) for further discussion of the project building's consistency with height, setback, and setback regulations). The project would also incorporate street trees, a narrow landscape strip between the building frontage and sidewalk along Northumberland Avenue, and trees, shrubs, and groundcover in the two proposed bio-retention areas. The project's proposed trees would extend the street canopy from the existing residential neighborhood to the north/northeast of the

project site.

**d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on light, glare, and sky glow impacts (EIR, p. 4-16). The analysis noted that future development under the Plan would result in additional lighting and increased light emanating from the Plan Area. However, new development will be subject to lighting standards set forth in the Plan and required to meet lighting power allowances for the applicable zone for newly installed outdoor lighting equipment under Title 24 of the California Building Code. Compliance with these standards and allowances is expected to adequately control unnecessary brightness of lighting, debilitating glare, and sky glow. Due to compliance with these regulations, the NFO Plan EIR concluded that the potential for light and glare impacts resulting from the NFO Plan would be less than significant.

The project would be consistent with the applicable Title 24 and NFO Plan standards. Pursuant to Section 6567.6 of the County Zoning Regulations, the project would have dark-sky compliant exterior and interior lighting designed and located so that direct rays and glare are confined to the premises, with the exception of street lighting on El Camino Real and Northumberland Avenue, which would light the public sidewalk. Project light fixtures would not project light toward the sky.

**e) Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?**

Impacts to designated Scenic Highways and State or County Scenic Corridors were scoped out of the NFO Plan EIR at the Notice of Preparation stage as the Plan Area does not include a designated Scenic Highway, nor is it within a State or County Scenic Corridor.

The project is not adjacent to a designated Scenic Highway nor a State or County Scenic Corridor.

**f) If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?**

This significance criterion was not part of the County's environmental checklist at the time the NFO Plan EIR was prepared.

The project is a permitted use (County Code Section 6567.3 Permitted Uses) and would comply with the design and development standards of the CMU-1 District. Table 4-1, Project Consistency with CMU-1 District Development Standards, shows the project's consistency, as currently designed, with applicable development standards contained within County Code Chapter 29.1, CMU-1 District, Section 6567.4 Development Standards. The project would also comply with the County's Design Standards for Private Development (County Zoning Regulations Section 6566.16), which include but are not limited to buildings oriented toward the primary adjoining street (i.e., El Camino Real); varied façade articulation, roof heights, and stepbacks; varied vertical and horizontal elements; high quality, durable roofing and wall materials; ground-level parking and parking access in the side or rear of the project; on-site stormwater capture and treatment features; underground utility lines if new distribution lines are required; and street trees and bicycle parking in the public right-of-way. The project also would comply with the CMU-1 district performance standards (County Zoning Regulations Section 6567.6), which include noise levels not exceeding levels permitted by the County Noise Control Ordinance (see Section 4.13, Noise), dark-sky compliant exterior and interior lighting, and

screened storage and regular disposal of trash. The new project driveway on Northumberland Avenue would meet County Public Works standards for driveway siting and design. With its compliance with the CMU-1 zoning standards, the proposed project would improve the appearance and visual character of the project site and its surrounding vicinity, aligning with the goals and vision of the NFO Community Plan.

**Table 4-1 Project Consistency with CMU-1 District Development Standards**

Criterion	Applicable Development Standard			Project Consistency
<b>Minimum Parcel Area</b> (§6567.4 1.)	5,000 sq. ft.			12,487 sq. ft.
<b>Minimum Parcel Width</b> (§6567.4 1.)	50 ft			>50 ft (approximately 55 feet minimum width)
<b>Building Setbacks</b> (§6567.4 2.a)	<u>Front Setback</u> <i>(all other cases)</i> 0 feet up to 10 feet max.	<u>Side Setback</u> 0 feet.	<u>Rear Setback</u> <i>(all other cases)</i> 15 feet up to 40 feet of building height and 22 feet above 40 feet of building height.	<p><u>Front Setback:</u> The project would provide a minimum front setback of 7 feet, 11<sup>3/4</sup> inches measured from the closest point of the building to the southern property line (not back of curb) along El Camino Real.</p> <p><u>Side Setback:</u> The project would provide side setbacks of 0 feet measured from the closest point of the building up to the property line along the western and eastern (Northumberland Avenue) property lines.</p> <p><u>Rear Setback:</u> The project proposes rear (northern) property line setbacks that vary from 15 feet for the first 25 feet of the building from grade to 22 feet for the portion of the building that exceeds 25 feet.</p>
<b>Building Frontage</b> (§6567.4 2.b)	<p>(1) Parcels facing El Camino Real must be developed with an El Camino Real frontage, with front and rear required setback determined by this orientation.</p> <p>(3) Signage and awnings may extend up to 5 feet into setbacks, consistent with the design standards in Sections 6566.15 and 6566.16.</p> <p>(5) Corner parcels on El Camino Real must have an El Camino Real frontage and an El Camino Real entrance, but may also have a corner entry, or an</p>			<p><u>Building Frontage:</u></p> <p>(1) The project, which contains parcels facing El Camino Real, would be developed with an El Camino Real frontage.</p> <p>(3) The project does not propose signage or awnings that would extend into setbacks.</p> <p>(5) The project site contains a corner parcel on El Camino Real. The project proposes an El Camino Real frontage and an El Camino</p>

<b>Table 4-1 Project Consistency with CMU-1 District Development Standards</b>		
<b>Criterion</b>	<b>Applicable Development Standard</b>	<b>Project Consistency</b>
	additional entry on the side street.	Real pedestrian entrance into the hotel. The project would also provide an additional, vehicular entry into the parking garage from a side street (Northumberland Avenue).
<b>Maximum Building Floor Area</b> (§6567.4 3.)	<p>a. Maximum building floor area shall include the floor area of all stories of all buildings and accessory buildings on a parcel. Maximum building floor area specifically includes: (1) the floor area of all stories, excluding non-habitable space, as measured from the outside face of all exterior walls, and (2) the area of all decks, porches, and balconies or other areas covered by a waterproof roof which extends four or more feet from exterior walls.</p> <p>b. The maximum floor area for institutional uses shall be 100 percent of the total parcel area, for commercial uses shall be 150 percent of the total parcel area, and for mixed-use development shall be 200 percent of the total parcel area.</p> <p>c. Fully or partially enclosed areas dedicated to parking shall be excluded from maximum building floor area.</p>	The project proposes a hotel building, a commercial use. The proposed hotel building would have a gross floor area of 18,715 sq. ft. (not including parking area) as compared to the total parcel area of 12,487 sq. ft. As such, the total floor area of the hotel would be approximately 150 percent of the total parcel area, consistent with requirement (b).
<b>Building Height</b> (§6567.4 4.)	The maximum building height shall be 50 feet for residential development, 60 feet for commercial development, 60 feet for institutional development, and 60 feet for mixed use development. The minimum building height is three stories, except in the case that a Use Permit is secured.	The project building, a hotel that constitutes commercial development, would measure 48 feet from at grade to top of roof (not including elevator vestibules, stairwell penthouses, or screening for rooftop mechanical equipment). The hotel would measure 50 feet in height inclusive of the rooftop wall intended to screen mechanical equipment from view.
<b>Signs</b> (§6567.4 5.)	a. Prohibited Signs. The following signs shall be prohibited: (1) Any sign that, because of its location, construction, colors, or operating characteristics, can	The project proposes two signs, one per street side. The signs will be integrated into the architecture of the building and do not exceed

**Table 4-1 Project Consistency with CMU-1 District Development Standards**

Criterion	Applicable Development Standard	Project Consistency
	<p>be confused with or obscure a traffic control device or emergency vehicle. (2) Signs having animated, moving, rotating, inflatable, or flashing parts. (3) Signs emitting intense and focused beams of light, including beacons. (4) Off-premises signs. (5) Abandoned signs. (6) Billboards. (7) Any sign that because of its location, construction or other characteristics will impede pedestrian movement or safety or will limit transparency of ground floor non-residential use.</p> <p>b. Maximum Number of Signs. The maximum number of signs allowed on a parcel is one sign per parcel, or one sign per each 200 feet of parcel street frontage, or one sign per use, whichever is greatest.</p> <p>c. Maximum Total Sign Display Area. The maximum total display area for all signs on a parcel is three-quarters square foot per foot of parcel street frontage.</p> <p>d. Maximum Window Sign Area. Signs located within windows and visible to the public shall not exceed 25% of the area of the window within which the sign is located. Window sign area does not count towards Maximum Total Sign Display Area.</p> <p>e. Maximum Sign Height. The maximum height of signs on a parcel is as follows: (1) Attached signs shall not exceed the height of the building or structure to which the sign is attached and shall not extend above the roofline. (2) Freestanding signs shall not exceed fifteen (15) feet.</p> <p>f. Sign Projection. Attached signs shall not project more than five feet from the building or structure to which the sign is attached. Attached or freestanding signs shall not project beyond any parcel boundary except signs may project into the public right-of-way subject to the approval of the Director of Public Works, and on El Camino Real,</p>	<p>the height of the building. Neither of the two proposed signs would exceed three-quarters square foot per foot of parcel street frontage. The project does not propose window signs. The proposed signs would not incorporate any features of prohibited signs per requirement a.</p>

<b>Table 4-1 Project Consistency with CMU-1 District Development Standards</b>		
<b>Criterion</b>	<b>Applicable Development Standard</b>	<b>Project Consistency</b>
	<p>subject to the approval of Caltrans.</p> <p>g. Sign Design. The design of signs on the parcel shall reflect the architectural design of the building or structure with which the sign is associated, and incorporate unifying colors, materials, and features.</p>	
<p><b>Screening</b> (§6567.4 6.)</p>	<p>a. Refuse, waste removal, and outdoor service/storage areas, where allowed, shall be screened with a six (6) foot solid wall or opaque fence/gate when the area is visible from a public right-of-way or residentially zoned parcel.</p> <p>b. A minimum six (6), not to exceed eight (8), foot masonry wall shall be erected along the entire common property line where a commercial or mixed use abuts a residentially zoned parcel. Other fencing along property lines shall be of opaque materials when visible from a public way or residentially zoned parcel. The Community Development Director may approve modifications to this standard.</p> <p>c. Mechanical equipment (e.g., air conditioning, heating, compressor, generator, venting units) or other utility hardware on the roof, ground, or buildings shall be screened with opaque and sound attenuating materials compatible with the building, when visible from or adjacent to a public right-of-way or residentially-zoned parcel.</p> <p>d. Fences, walls or screens shall not include barbed or concertina wire, or chain-link fence with or without slats.</p>	<p>The project does not propose outdoor service/storage areas. All service areas would be contained within the hotel building. The partially enclosed parking spaces in the rear of the project site would be screened from view from Northumberland Avenue and the adjacent residentially zoned parcel to the north by a 6-foot masonry wall.</p> <p>The project would screen rooftop mechanical equipment from view for the adjacent public right-of-way with rooftop walls.</p> <p>The project proposes a 6-foot masonry wall that would run along the eastern property line from the hotel building to the northeast corner of the site and along the northern property line to screen the rear portion of project site from the adjacent multi-family residential parcels. Project walls would not include barbed or concertina wire, nor chain-link components.</p>

The proposed project would redevelop the three subject parcels, one of which is identified as an underutilized parcel in Figure 2.6 of the NFO Plan. The project would redevelop the site for the intended regional serving uses, encouraging redevelopment of the El Camino Real commercial corridor, per Goal 2.2 of the NFO Plan.

Therefore, following the approval of a Zoning Amendment and General Plan Amendment that would re-zone the 11 Northumberland Avenue parcel to the CMU-1 District, the project would comply with all applicable General Plan and Zoning Ordinance provisions regarding Design

Review.

**g) Visually intrude into an area having natural scenic qualities?**

This significance criterion was not part of the County's environmental checklist at the time the NFO Plan EIR was prepared.

The project is located within an urbanized area on an already developed site. Therefore, it would not intrude into an area having natural scenic qualities.

**h) Cast shadow that substantially impairs the beneficial use, important values, or livability of any shadow-sensitive use, including public parks, plazas, or open spaces areas, or shadow-sensitive portions of residential parcels?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in shade and shadow impacts (EIR, p. 4-16). The analysis noted that the NFO Plan permits building heights of up to (6) stories in the highest intensity areas near the potential transit station if it is developed, which would result in an increase in shadows cast by development. The Plan's design guidelines encourage building massing with greater intensities on major streets and lower intensities adjacent to existing residential development. Resulting shadows would not be expected to impair the livability and beneficial uses of light-sensitive uses and spaces. The NFO Plan EIR concluded the Plan's impacts associated with shade and shadow would be less than significant.

The proposed project building would be four (4) stories along Northumberland Avenue and four (4) stories along El Camino Real. The project is consistent with the setback and stepback regulations for parcels within the CMU-1 Zoning District. The proposed hotel building meets the maximum building height standard allowed for the project parcels. Therefore, the project would not create any new unforeseen shadow impacts requiring additional mitigation measures.

#### **4.1.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative aesthetic impacts (EIR, pp. 4-16 to 4-17). The policies of the Plan and other existing plans, regulations, and guidelines would adequately address localized visual quality and compatibility. The NFO Plan EIR concluded that the Plan would be expected to result in beneficial impacts or less than significant impacts with respect to visual character and quality, scenic vistas, scenic highways, light, glare and sky glow, and shade and shadow, and that cumulative aesthetics impacts would be less than significant.

The project would comply with NFO Plan policies and other existing plans, regulations, and guidelines and, therefore, would not result in any significant, cumulatively considerable impacts to aesthetics and visual resources.

#### **4.1.3 Mitigation Measures**

No significant aesthetic impacts were identified in the NFO Plan EIR and, therefore, no mitigation measures were required.

#### **4.1.4 Conclusion**

The conclusions of the NFO Plan EIR relating to aesthetics remain valid. The proposed project is consistent with the NFO Plan EIR and requirements of the NFO Plan CMU-1 Zoning District and Commercial Mixed-Use (Medium High Density) land use designation. There is no evidence



of substantial changes to the circumstances under which the NFO Plan EIR aesthetic impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant aesthetic impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.2 AGRICULTURE AND FORESTRY RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification ?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>2. Agriculture and Forestry Resources.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. <b>Would the project:</b>				
a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Scoped out at Notice of Preparation stage.  Resources do not exist in NFO Plan Area.	No	No	NA
b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?	Scoped out at Notice of Preparation stage.  No agricultural zoning, Open Space Easements, or Williamson Act contracted lands exist in NFO Plan Area.	No	No	NA
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	Scoped out at Notice of Preparation stage.  Resources do not exist in NFO Plan Area.	No	No	NA

d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussel sprouts?	<p>Scoped out at Notice of Preparation stage.</p> <p>NFO Plan Area is not within the Coastal Zone.</p> <p>Resources do not exist in NFO Plan Area.</p>	No	No	NA
e. Result in damage to soil capability or loss of agricultural land?	<p>Scoped out at Notice of Preparation stage.</p> <p>Resources do not exist in NFO Plan Area.</p>	No	No	NA
<p>f. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?</p> <p><i>Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.</i></p>	<p>Scoped out at Notice of Preparation stage.</p> <p>No forest land nor timberland zoning exists in the NFO Plan Area.</p>	No	No	NA

### 4.2.1 Discussion and Conclusion

Agriculture and forestry impacts were scoped out of the NFO Plan EIR at the Notice of Preparation stage as these resources do not exist in the NFO Plan Area. The project site does not contain any agriculture or forestry resources and, therefore, the project would not have potential impacts on agriculture or forestry resources.

### 4.3 AIR QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>3. Air Quality.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. <b>Would the project:</b>				
a. Conflict with or obstruct implementation of the applicable air quality plan?	NFO Plan EIR, pp. 5-21 to 5-22.	No	Yes. BAAQMD adopted a new air quality plan, the 2017 Clean Air Plan.  Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	NA
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	NFO Plan EIR pp. 5-18 to 5-28.	No	Yes. BAAQMD has developed and published new CEQA significance thresholds.  Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	Yes

c. Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?	NFO Plan EIR, pp. 5-18 to 5-28.	No	Yes. BAAQMD has developed and published new CEQA significance thresholds.	Yes
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	NFO Plan EIR, p. 5-29.	No	No	Yes

### 4.3.1 Discussion

#### Would the project:

##### a) Conflict with or obstruct implementation of the applicable air quality plan?

The NFO Plan EIR evaluated whether the implementation of the Plan would be consistent with the Bay Area 2010 Clean Air Plan (EIR, pp. 5-21 to 5-22). The analysis noted that according to the BAAQMD CEQA Guidelines, in order to meet the threshold of significance for operational-related criteria air pollutant and precursor emissions impacts for plans, a proposed plan must: (1) be consistent with current air quality plan control measures; and (2) result in a projected rate of increase in vehicle use less than or equal to its projected rate of increase in population.

The Bay Area 2010 Clean Air Plan updated the Bay Area 2005 Ozone Strategy, which included seven transportation control measures that require local participation. A number of NFO Plan Land Use goals would assist in implementing the Clean Air Plan transportation control measures. The EIR lists these goals:

- Goal LU1: Encourage mixed-use development along major commercial corridors and within industrial areas to support a vibrant, urban community that integrates a range of amenities in close proximity to surrounding residential neighborhoods.
- Goal LU2: Promote revitalization through redevelopment of underutilized and vacant land in North Fair Oaks to serve local and regional needs, and to support community and economic development.
- Goal LU3: Amend and streamline land use categories to strengthen neighborhood and community character and to incentivize needed and appropriate development.
- Goal LU4: Encourage transit-oriented development around a future multi-modal transit center.

According to the NFO Plan EIR, existing land uses within the NFO Plan Area generate an estimated 51,020 daily vehicle trips. Land uses at buildout of the NFO Plan in 2035 would generate an estimated 81,248 daily vehicle trips, which would represent a 59 percent increase in vehicle use. The 2010 population within the NFO Plan Area was estimated at 15,477 persons. The development of an additional 3,024 housing units under the NFO Plan would result in a projected increase in population of 11,794 persons, an increase of 76 percent. Therefore, the projected increase in vehicle use under the NFO Plan would be less than the projected increase in population. As such, the NFO Plan would be consistent with the Clean Air Plan, and the EIR concluded that the regional criteria pollutant and precursor impacts of the NFO Plan would be less than significant.

The air quality conditions in North Fair Oaks and the San Francisco Bay Area Air Basin have not

substantially changed from that described in the NFO Plan EIR (pp. 5-7 to 5-11), and the proposed project would remain subject to air quality plans and regulations that are substantially the same or more stringent than those considered in the NFO Plan EIR (DEIR pp. 5-11 to 5-17).

New information related to air quality plans was considered. Specifically, the BAAQMD adopted a new air quality plan, the 2017 Clean Air Plan. The 2017 Clean Air Plan is a comprehensive plan designed to improve Bay Area air quality and protect public health. It addresses four categories of pollutants: ozone and ozone precursors (e.g., reactive organic gases, or ROG, and oxides of nitrogen, or NOX), fine particulate matter, toxic air contaminants (TACs), and greenhouse gases (GHG). The plan includes 85 distinct control measures to help the region reduce air pollutants and has a long-term strategic vision which forecasts what a clean air Bay Area will look like in the year 2050. The control measures aggressively target the largest source of GHG, ozone pollutants, and particulate matter emissions – transportation. The 2017 Clean Air Plan includes more incentives for electric vehicle infrastructure, off-road electrification projects such as Caltrain and shore power at ports, and reducing emissions from trucks, school buses, marine vessels, locomotives and off-road equipment. The topics and issues addressed by this new information were generally known at the time of the 2010 EIR. For example, the BAAQMD's 2010 Clean Air Plan addressed ozone attainment and provided information on particulate matter emissions in the SFBAAB. Therefore, this new information is not considered to be of substantial importance because it does not show the project would result in a new significant or substantially more severe significant environmental effect that could not have been known at the time the NFO Plan EIR was certified.

The project would redevelop an underutilized parcel and serve regional hospitality needs in a high-quality transit corridor/transit priority area, contributing to the redevelopment of the El Camino Real commercial corridor. As such, the project would comply with NFO Plan Goal 2.2. The project is also consistent with General Plan Policy 12.21 (Local Circulation Policies), which encourages minimal through traffic in residential areas and adequate access for emergency vehicles. The project has been reviewed and conditionally approved by the Menlo Park Fire Protection District (MPFPD) with regard to emergency vehicle access. The project VMT Analysis concluded the project meets all screening criteria that exempts the proposed development from further CEQA analyses, does not provide more parking than is required of the project, and would not displace affordable housing (North Fair Oaks Community Council 2022). Further, the project is consistent with the development assumptions of the NFO Plan EIR. The project's proposed building size and number of hotel rooms are consistent with the standards of the CMU-1 District, as discussed in Section 4.11, Land Use and Planning, of this consistency analysis.

The NFO Plan EIR projected the Plan would result in an additional 30,200 daily vehicle trips, 2,060 morning peak hour trips, and 2,870 evening peak hour vehicle trips. According to the VMT analysis prepared for the proposed project, the project would generate 277 daily vehicle trips, 25 morning peak hour trips, and 21 evening peak hour trips (Hexagon 2021, p. 4), which is well within the overall trip generation assumed in the NFO Plan EIR.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in short-term construction emissions (EIR, pp. 5-18 to 5-21). The analysis noted that demolition or construction activities facilitated by the NFO Plan may generate temporary emissions of ROG (reactive organic gas), NO<sub>x</sub> (nitrogen oxide), and PM<sub>10</sub> (particulate matter with particles that

have aerodynamic diameters less than or equal to 10 microns [ $\mu\text{m}$ ]), exceeding BAAQMD thresholds of significance that apply to exhaust and evaporative emissions from construction activities. In addition, related construction dust could cause localized health and nuisance impacts on adjacent residential sensitive receptors. These possible effects represent a potentially significant impact.

State law requires retrofitting or replacement of construction equipment and large trucks, which will decrease future NO<sub>x</sub> and particulate matter emissions. The NFO Plan EIR included Mitigation Measure 5-1, which will decrease short-term temporary emissions resulting from demolition and construction activities by requiring dust control measures and best management controls on emissions by diesel-powered construction equipment. See Mitigation Measure 5-1 in the attached MMRP in Appendix A. The NFO Plan EIR concludes that implementation of Mitigation Measure 5-1 would reduce the short-term construction-related air quality impact of the NFO Plan to less than significant.

The project would comply with State law and would implement the required dust control measures and best management controls on emissions by diesel-powered construction equipment required by Mitigation Measure 5-1.

The NFO Plan EIR evaluated whether the implementation of the Plan would result in community risk and hazard impacts (EIR, pp. 5-23 to 5-28). The analysis noted that future development in accordance with the NFO Plan could expose sensitive receptors to levels of toxic air contaminants (TACs) or PM<sub>2.5</sub> that cause an unacceptable cancer risk or hazard, which represents a potentially significant impact. Specifically, the NFO Plan would permit and facilitate the development of new sensitive receptors (e.g., new homes) in locations near arterial roadways and the Caltrain line. Screening modeling indicates that sensitive receptors within the NFO Plan Area would be exposed to levels of TACs and or PM<sub>2.5</sub> that could cause an unacceptable cancer risk or hazard near the following roadways and train lines. Table 5.5 from the Draft NFO Plan EIR identifies the screening level exposures for these sources below.

Table 5.5

**SCREENING SETBACK DISTANCES FOR SOURCES OF TACs AND PM<sub>2.5</sub>**

Source	Distance in Feet <sup>1</sup>	Notes
El Camino Real	<100 feet	Due to TAC cancer risk
Arterial roadways	<10 feet	Due to TAC cancer risk
Caltrain	100 feet	No impact if Caltrain electrified.
Dumbarton Rail Corridor	<100 feet	Impact only if train service developed using diesel-powered locomotives
Stationary sources (e.g., dry cleaners)	<300 feet	Based on ARB guidance and planned phase-out of perchloroethylene by 2023
Stationary sources (other)	<100 feet	

SOURCE: Illingworth & Rodkin, 2011; BAAQMD, 2011; MIG, 2011.

<sup>1</sup> As measured from the edge of the nearest through travel lane or rail track.

The NFO Plan EIR indicated there are currently less than approximately 16,000 daily vehicle streets on arterial street segments (not including El Camino Real, Marsh Road, and Middlefield Road) in the Plan Area. According to the BAAQMD Risk and Hazard Screening Tables for San Mateo County (October 2010 version), roadways with average daily traffic volumes lower than 20,000 trips do not result in significant cancer risk and PM<sub>2.5</sub> exposures at distances greater than 10 feet from the roadway. Therefore, new residential uses or other sensitive receptors located within 10 feet of an arterial roadway (other than El Camino Real, Marsh Road, or

Middlefield Road) could be exposed to a significant cancer risk.

The NFO Plan EIR included Mitigation Measure 5-2, which requires a site-specific health risk assessment or implementation of all listed building and design measures intended to protect sensitive receptors from health risks associated with proximity to the above TAC and PM<sub>2.5</sub> sources. See Mitigation Measure 5-2 in the attached MMRP (Appendix A). The NFO Plan EIR concluded that with implementation of applicable mitigation options under Mitigation Measure 5-2, the potential TAC and PM<sub>2.5</sub> exposure impacts of the NFO Plan would be reduced to a less than significant level.

The project site is located within 10 feet of an arterial roadway (i.e., Northumberland Avenue). However, the project does not propose residential uses, and hotel occupants would not be considered sensitive receptors due to their occupying the hotel on a transient basis and being subject to elevated air quality emissions for a brief duration. Further, neither the County General Plan nor the NFO Plan categorizes hotel occupants as sensitive receptors (County of San Mateo 2011). The project's proximity to Northumberland Avenue, therefore, would not result in a significant air quality impact.

The NFO Plan EIR also identified stationary sources of air pollutant emissions within the NFO Plan Area (EIR, pp. 5-25 to 5-26). There are no existing major stationary sources of TACs or PM<sub>2.5</sub> in the Plan Area; however, the BAAQMD lists dry cleaners and emergency generators within or near the Plan Area for which specific emissions or exposure information is not available. BAAQMD and the California Air Resources Board (CARB) regulations restrict operation of emergency generator engines to 50 hours or less per year for testing or routine maintenance. Emergency generators are estimated to pose a potentially significant cancer risk at distances of up to 100 feet. Sources of air pollutant emissions complying with applicable BAAQMD permit requirements generally would not be considered to have an individual significant air quality impact. Stationary sources that are exempt from BAAQMD permit requirements due to low emissions would also be considered to not have a significant air quality impact.

According to NFO Plan EIR Figure 5.1, the closest stationary source of emissions to the project site is a graphics arts printing operations facility, Te Connectivity, located approximately 2,870 feet to the northeast at 501 Oakside Avenue (Plant ID 13213) (EIR, p. 5-26). Considering the Te Connectivity facility is located over 1,000 feet (BAAQMD's standard screening distance for cancer risk, non-carcinogenic hazard, and PM<sub>2.5</sub> concentrations [BAAQMD 2022]) from the project site, it is unlikely that the Te Connectivity facility would present a health risk to project staff and hotel guests due to potential cancer risk, non-carcinogenic hazard, and PM<sub>2.5</sub> concentrations.

Table 4-2 summarizes the BAAQMD-permitted stationary sources within 1,000 feet of the proposed project site and corresponding cancer risk, non-carcinogenic hazard, and PM<sub>2.5</sub> concentrations resulting from these sources.



<b>Table 4-2 Health Risks from Existing Emission Sources</b>						
<b>Plant ID</b>	<b>Plant Name</b>	<b>Plant Type</b>	<b>Cancer Risk (per million)<sup>(A)</sup></b>	<b>Hazard Index<sup>(B)</sup></b>		<b>PM<sub>2.5</sub> (µg/m<sup>3</sup>)<sup>(C)</sup></b>
				<b>Chronic</b>	<b>Acute</b>	
15854	Target Corporation – T0321	Department Store	0.005	0.000	n/a	0.000
11077	El Camino Auto Body	Automotive Body, Paint, and Interior Repair and Maintenance	n/a	0.001	n/a	n/a
<b>Total Risk</b>			<b>0.005</b>	<b>0.001</b>	<b>n/a</b>	<b>0.000</b>
<b>BAAQMD Threshold (Individual Project)</b>			<b>10</b>	<b>1</b>	<b>1</b>	<b>0.3</b>
<b>BAAQMD Threshold (Cumulative Threshold)</b>			<b>100</b>	<b>10</b>	<b>10</b>	<b>0.8</b>
Source: BAAQMD 2023 (A) Increased cancer risk level expressed in terms of excess cancer cases per million population. BAAQMD threshold represents the cancer burden or number of excess cancer cases that could occur in a general population such as community or city based on a lifetime of exposure (70 years) to carcinogens. (B) Non-carcinogenic risk level expressed in terms of the sum of all hazard quotients for all chemicals a receptor is exposed to, or Hazard Index. (C) PM <sub>2.5</sub> concentration units are micrograms per cubic meter (µg/m <sup>3</sup> ). BAAQMD threshold represents the annual average PM <sub>2.5</sub> receptor exposure that should not be exceeded. (D) n/a indicates the facility does not pose/there is no data available from the BAAQMD for the specific risk.						

As Table 4-2 shows, BAAQMD data indicates the two permitted stationary sources of air pollutants near the project site would not result in substantial adverse health risks. The emissions sources both individually and cumulatively do not exceed the BAAQMD's risk thresholds. Further, none of the stationary sources included in Table 4-2 above is located within the NFO Plan EIR's 100-ft screening setback distance to protect sensitive receptors from health risks associated with stationary sources of air pollutant emissions. In addition, as discussed previously, the occupants of the proposed hotel would not be considered sensitive receptors due to their occupying the hotel on a transient basis, and the County General Plan and NFO Plan do not categorize hotels as sensitive uses. Therefore, air pollutant concentrations from the stationary emissions sources in the project site vicinity would not be considered to have a significant individual or cumulative air quality impact on project occupants, and Mitigation Measure 5-2 does not apply to the project.

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in localized carbon monoxide concentrations impacts (EIR, p. 5-22 to 5-23). The analysis noted that development facilitated by the NFO Plan would generate new vehicle trips and change traffic patterns. The consequential pollutant of greatest concern is CO (carbon monoxide). Monitoring data from all ambient air quality monitoring stations in the Bay Area indicate that existing carbon monoxide levels are currently below national and California ambient air quality standards. Monitored CO levels have decreased substantially since 1990 due to newer vehicles with greatly improved exhaust emission control systems replacing older vehicles. The Bay Area has been designated as attainment for the CO standards. However, although current CO levels in the Bay Area are well below ambient air quality standards and there have been no exceedances of CO standards in the Bay Area since 1991, elevated levels of CO still warrant analysis because CO hotspots (occurrences of localized high CO concentrations) could occur near busy, congested intersections.

According to the BAAQMD, a project would have a less than significant impact if the project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. Since intersections affected by the NFO Plan would have volumes less than the threshold of 44,000 vehicles per hour, the NFO Plan EIR concludes that the Plan's impacts related to localized CO concentrations would be less than significant.

The project is consistent with the NFO Plan EIR development assumptions. The CMU-1 District and Commercial Mixed Use (Medium High Density) land use designations allow for the construction of hotel uses at the land use intensity proposed by the project. The NFO Plan EIR projects the Plan will result in an additional 30,200 daily vehicle trips, 2,060 morning peak hour trips, and 2,870 evening peak hour vehicle trips. According to the VMT analysis prepared for the proposed project, the project would generate 277 daily vehicle trips, 25 morning peak hour trips, and 21 evening peak hour trips (Hexagon 2021, p. 4), which is well within the trip generation assumed in the NFO Plan EIR.

**c) Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?**

See Section 4.3.1 b) for discussion of impacts caused by short-term construction emissions and for discussion of community risk and hazard impacts.

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in odor impacts caused by mixed-use development (EIR, p. 5-29). The analysis noted that mixed use development in accordance with the NFO Plan could result in food service uses (e.g., restaurants), painting facilities, or dry-cleaning facilities in close proximity or in the same building as residential or other odor-sensitive uses. The NFO Plan Area contains numerous auto service uses, including auto body shops with paint spraying operations. Although controlled by BAAQMD permits and regulations, these types of uses can produce solvent type odors that may be objectionable. Without proper controls or setbacks, there is a potential for land use conflicts that could result in odor complaints. Therefore, this possibility represents a potentially significant impact.

The NFO Plan EIR included Mitigation Measure 5-3, which requires measures that would reduce odor impacts associated with cooking or restaurant uses, paint spraying operations (e.g., auto body shops), cleaning operations (e.g., dry cleaners), or other uses with the potential to cause odors. Mitigation Measure 5-3 also requires measures to identify and adequately disclose potential odor impacts in notices to prospective buyers and tenants of new residential dwellings within 300 feet of existing uses with the potential to cause odors. See Mitigation Measure 5-3 in the attached MMRP (Appendix A). The NFO Plan EIR concluded that Mitigation Measure 5-3 would reduce such impacts to a less than significant level.

The project is a hotel development and does not propose housing units that would be available to prospective buyers or tenants. As such, regardless of whether the project site is located within 300 feet of existing uses with the potential to cause odors, this impact would be less than significant, and Mitigation Measure 5-3 is not applicable.

### **4.3.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative air quality impacts (EIR, pp. 5-29 to 5-30). The NFO Plan EIR concluded that since, with mitigation measures, the NFO Plan would not

have a significant impact according to the latest BAAQMD CEQA Air Quality Guidelines, the Plan would also not result in cumulatively considerable contribution to a significant cumulative impact on regional air quality.

The project would be subject to and would comply with Mitigation Measure 5-1.

#### **4.3.3 Mitigation Measures**

See Mitigation Measure 5-1 in the attached MMRP (Appendix A).

#### **4.3.4 Conclusion**

The conclusions of the NFO Plan EIR relating to air quality remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR air quality impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant air quality impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.4 BIOLOGICAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>4. Biological Resources. Would the project:</b>				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	NFO Plan EIR, p. 6-8.	No	No	NA
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Scoped out at Notice of Preparation stage. Resources do not exist in the NFO Plan Area.	No	No	NA
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Scoped out at Notice of Preparation stage. Resources do not exist in the NFO Plan Area.	No	No	NA
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?	NFO Plan EIR, pp. 6-8 to 6-9.	No	No	Yes
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?	NFO Plan EIR, p. 6-9.	No	No	NA

f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Scoped out at Notice of Preparation stage. Resources do not exist in the NFO Plan Area.	No	No	NA
g.	Be located inside or within 200 feet of a marine or wildlife reserve?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
h.	Result in loss of oak woodlands or other non-timber woodlands?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA

#### 4.4.1 Discussion

##### Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on special-status species (EIR, p. 6-8). The analysis noted that special-status species are not expected to occur within the NFO Plan Area because of a lack of suitable habitat, the small size and fragmented nature of remaining habitat, prior disturbance, and the current level of human activity. Therefore, the NFO Plan EIR concluded that impacts of the NFO Plan on special-status species would be less than significant.

The project site is already developed and does not contain suitable habitat for any species identified as a candidate, sensitive, or special-status species. The project would not have a substantial adverse effect on candidate, sensitive, or special-status species.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Impacts to riparian habitat and other sensitive natural communities were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The project site is previously developed and does not contain riparian habitat nor other sensitive natural community. The project would not result in impacts to riparian habitat or other sensitive natural community.

- c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Impacts to federally protected wetlands were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The project site is previously developed and does not contain federally protected wetlands. According to the U.S. Fish and Wildlife Service's (USFWS) National Wetlands Inventory (NWI), the project site does not contain nor is located in the vicinity of wetlands of any kind (USFWS 2023). Therefore, no state protected wetlands occur on or near the project site, and the project would not impact a state protected wetland.

**d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in migratory wildlife impacts (EIR, pp. 6-8 to 6-9). The analysis noted that wildlife use within the NFO Plan Area is expected to be relatively low due to the absence of natural habitat, the proximity of streets and development, and the lack of protective cover. The NFO Plan Area is limited in its function for wildlife movement due to its extensively developed nature. Birds (e.g., house sparrow, starling, crow, etc.) and wildlife such as opossums and small rodents typically associated with developed properties would be expected to occur.

Proximity to the Don Edwards National Wildlife Refuge on Bair Island and San Francisco Bay makes the Plan Area accessible to migratory birds. Nesting birds, including raptors, are protected by the California Department of Fish and Game (CDFG) Code Section 3503. Passerines (songbirds) and non-passerines (landbirds) are further protected under the Federal Migratory Bird Treaty Act (MBTA). Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment, which represents a potentially significant impact.

To mitigate this potentially significant impact, the NFO Plan EIR included Mitigation Measure 6-1, which requires specific timing of tree removal/trimming as well as ground-disturbing activities. If construction is unavoidable during the timing required by Mitigation Measure 6-1, a qualified biologist must survey for nesting birds before the removal or trimming of any tree and prior to start of ground disturbing activities. Tree removal, tree pruning, or grading activities shall be conducted outside of the nesting season to the maximum practicable extent. The California Department of Fish and Wildlife (CDFW) biologists have defined the nesting season as February 1<sup>st</sup> through August 15<sup>th</sup>. If other timing restrictions make it impossible to avoid the nesting season, the trees shall be surveyed by a qualified professional to identify nesting birds. Active nests shall be avoided. If an active nest is found, follow-up surveys shall be conducted to confirm when the nest is no longer active. Delay removal or pruning activity within 300 feet of an active nest until the nest is no longer active unless authorization for removal from the wildlife agency with jurisdiction is obtained. If a nest is disturbed during tree pruning or removal, contact a local wildlife rehabilitator or rescue service and CDFW, and follow instructions for care of the disturbed wildlife. See Mitigation Measure 6-1 in attached MMRP. The NFO Plan EIR concluded that with implementation of Mitigation Measure 6-1, the NFO Plan would result in less than significant impacts to migratory wildlife.

There is no natural habitat, including trees, nor are there water resources located on the project site. As such, Mitigation Measure 6-1 does not apply to the project.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in potential loss of heritage trees or significant trees (EIR, p. 6-9). The analysis noted that development in

accordance with the NFO Plan would be subject to the County's Heritage Tree Ordinance and Significant Trees Ordinance. Any project that would involve the removal of any tree or community of trees protected by the Heritage Tree Ordinance or Significant Trees Ordinance would be required to first obtain a permit from the County and comply with any conditions of the permit, including replacement plantings and protection of remaining trees during construction. As a result, the NFO Plan EIR concluded that the potential impacts of the NFO Plan on Heritage Trees and Significant Trees would be less than significant.

The project site does not contain any natural habitat, including trees. As such, the project would not conflict with any local policy or ordinance protecting biological resources, including the County's Heritage and Significant Tree Ordinances.

**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

Impacts related to conflicts with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other habitat conservation plans were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The project site is not covered by any Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan.

**g) Be located inside or within 200 feet of a marine or wildlife reserve?**

This significance criterion was not included in the NFO Plan EIR.

The project site is not located within 200 feet of a marine or wildlife reserve. No impact would occur.

**h) Result in loss of oak woodlands or other non-timber woodlands?**

This significance criterion was not included in the NFO Plan EIR.

The project site is currently developed and located in an urban area that does not contain oak woodlands nor non-timber woodlands. The project would not result in the loss of oak woodlands or other non-timber woodlands. No impact would occur.

#### **4.4.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative biological resources impacts (EIR, p. 6-9). The NFO Plan EIR concluded that with implementation of Mitigation Measure 6-1, the contribution of the Plan to potentially significant biological resources impacts would be less than significant. No cumulatively considerably contribution to a significant cumulative biological resources impact was identified; therefore, no mitigation for cumulative biological resources impacts was required.

The project site does not contain any natural habitat, including trees. Mitigation Measure 6-1 does not apply to the project.

#### **4.4.3 Mitigation Measures**

The NFO Plan EIR included Mitigation Measure 6-1. Mitigation Measure 6-1 does not apply to the project.

#### **4.4.4 Conclusion**

The conclusions of the NFO Plan EIR relating to biological resources remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR biological resources impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant biological resources impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.



## 4.5 CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>5. Cultural Resources. Would the project:</b>				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	NFO Plan EIR, pp. 8-14 to 8-17.	No	No	Yes
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	NFO Plan EIR, pp. 8-12 to 8-13.	No	No	Yes
c. Disturb any human remains, including those interred outside of formal cemeteries?	NFO Plan EIR, pp. 8-12 to 8-13.	No	No	Yes

### 4.5.1 Discussion

#### Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on historic resources (EIR, pp. 8-14 to 8-17). Recorded historic properties within the Plan Area are included in Table 8.1 of the Plan EIR, shown below.

Table 8.1  
RECORDED HISTORIC PROPERTIES WITHIN THE COMMUNITY PLAN AREA

Primary Number	Street Address	Year Built	National Register Status Code <sup>1</sup>
	721 3 <sup>rd</sup> Street	1940	6Y
	96 Buckingham Avenue	1924	6Y
	20 Dexter Street	1929	6Y
	2829 Marlborough Avenue	1908	6Y
	723 Marsh Road	1963	6Y
	2600 Middlefield Road	1972	6Y
	3600 Middlefield Road	1926	6Y
	500 Warrington Avenue	1950	6Y
P-41-000422	Peninsula Commute Service (San Francisco & San Jose Railway)		
P-41-000425	Hetch-Hetchy Bay Division Pipeline		

SOURCE: Office of Historic Preservation, Directory of Properties in the Historic Property Data File for San Mateo County, March 15, 2011.

<sup>1</sup>The appropriate code that best describes a potential resource's relationship to the national Register of Historic Places is entered on standard historical inventory forms DPR 523A. Each of the recorded buildings listed above has a status code of 6Y, meaning they have been determined ineligible for the National Register by consensus through a process pursuant to Section 106 of the National Historic Preservation Act, but have not been evaluated for the California Register or Local Listing.

EIR Table 8.1 shows there are ten (10) previously recorded historic properties within the NFO Plan Area: eight (8) recorded buildings which have been determined ineligible for the National Register of Historic Places, but have not been evaluated for potential eligibility for the California Register of Historical Resources or for local listing; and two recorded structures, the Peninsula Commute Service (also known as the San Francisco & San Jose Railway) and the Hetch Hetchy Bay Division Pipeline. There may also be additional unrecorded buildings, structures, or objects 45 years or older within the Plan Area that are of potential historical value.

Future development on properties within the NFO Plan Area that contain a potentially significant historic resource (i.e., a recorded historic resource or an unrecorded building or structure 45 years or older of historical significance) may cause the demolition, destruction, or alteration of a significant historic resource such that the significance of the resource is "materially impaired." This possibility represents a potentially significant impact. The NFO Plan EIR included Mitigation Measure 8-2, which applies to any individual discretionary project within the NFO Plan Area that the County determines may involve a property that contains a potentially significant historic resource. The measure requires an evaluation of any involved potentially significant resources, and if the evaluation determines that the project could have a potentially significant impact, a set of measures would apply, including adherence to Secretary Standards, relocation, or documentation depending on feasibility. See Mitigation Measure 8-2 in the attached MMRP (Appendix A). The NFO Plan EIR concluded that implementation of this measure would reduce the Plan's impacts to historic resources to less than significant unless the resource is irretrievably materially impaired as a result of the project.

The project site does not contain any recorded historic resources. Currently, the project site contains two buildings housing a restaurant and salon, a parking lot, a trash enclosure, and fencing. The two on-site buildings were constructed in 1954 and, as such, are more than 45 years old (Essel 2019). The nearest recorded historic property within the Plan Area is the Hetch-Hetchy Bay Division Pipeline located approximately 80 feet southeast of the project site across

Northumberland Avenue. The project site is not located within the Hetch-Hetchy Bay Division Pipeline right-of-way. Project activities would be fully contained within the project site, and the project would not impact the Hetch-Hetchy Bay Division Pipeline. The project site does not contain any recorded historic resources. The project site appears to have been occupied by a building as early as 1943 (Essel 2019). 11 Northumberland Avenue was occupied by a residence as early as 1943. 2561 El Camino Real was occupied by a restaurant as early as 1959; various retail businesses have since occupied the one-story building at 2561 El Camino Real. 2567 El Camino Real has been occupied by restaurants, retail businesses, and private residents over time following the construction of the existing two-story building in 1954. By 1974, the residence at 11 Northumberland Avenue had been redeveloped into the present-day parking lot.

If determined necessary by the County, the project would comply with Mitigation Measure 8-2 (see MMRP in Appendix A). Implementation of Mitigation Measure 8-2 could reduce the project's impacts to historical resources to less than significant; in the unlikely event that a historic resource is irretrievably materially impaired by the proposed project, the impact would remain significant and unavoidable, as defined in EIR Mitigation Measure 8-2.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on archaeological resources (EIR, pp. 8-12 to 8-13). The analysis noted that the NFO Plan Area contains three (3) recorded archaeological resources, P-41-000086, P-41-000299, and P-41-000303, all of which are prehistoric Native American habitation sites. Given the location of the NFO Plan Area within valley lands approximately 1/2-mile from the historic San Francisco Bay shoreline near the locations of former intermittent and perennial watercourses, there is a moderate to high potential for the presence of additional unrecorded Native American resources within the NFO Plan Area. There are no previously recorded historic-period archaeological resources within the NFO Plan Area. Based on review of historical literature and maps, there is a moderate to high potential for the presence of unrecorded historic-period archaeological resources within the NFO Plan Area.

Development in accordance with the NFO Plan could disrupt, alter, or eliminate as-yet undiscovered prehistoric or historic-period archaeological sites, potentially including Native American remains. This possibility represents a potentially significant impact. The NFO Plan EIR included Mitigation Measure 8-1, which requires identification of the three (3) recorded Native American habitation sites within the Plan Area, measures protecting these sites, and measures applicable in the inadvertent discovery of archaeological resources or Native American remains. See Mitigation Measure 8-1 in attached MMRP (Appendix A). The NFO Plan EIR concluded that implementation of this mitigation measure would reduce the Plan's impacts to archaeological resources to less than significant.

The project does not appear to be located within one of the three (3) recorded Native American habitation sites, though the location of any other undiscovered archaeological resources in the project vicinity cannot be confirmed at this time. In the event of inadvertent discovery of archaeological resources, including tribal cultural resources, and/or human remains, the project would comply with Mitigation Measure 8-1. Implementation of Mitigation Measure 8-1 would reduce the project's impacts to archaeological resources and human remains to less than significant.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

See Section 4.5.1 b) for a discussion of impacts on archaeological resources and human remains.

#### **4.5.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative cultural resources impacts (EIR, p. 8-18). The NFO Plan EIR concludes that implementation of Mitigation Measure 8-1 would reduce the impacts of the Plan, and, therefore, reduce the Plan's contribution to significant cumulative impacts on archaeological resources to less than significant. However, the Plan EIR concluded that cumulative impacts related to historic resources would be considerable and therefore significant and unavoidable because, without consideration of a specific development proposal, it would not be known whether Mitigation Measure 8-2 would be feasible to mitigate potential impacts of a subsequent project to less than significant. The Plan EIR included Mitigation Measure 8-4 to address the cumulative impacts of the updated Plan, which would remain cumulatively considerable and thus significant and unavoidable.

The absence of potentially significant historic resources on the project site cannot be confirmed at this time. The project would be subject to and comply with Mitigation Measure 8-2 and Mitigation Measure 8-4.

#### **4.5.3 Mitigation Measures**

See Mitigation Measure 8-1, Mitigation Measure 8-2, and Mitigation Measure 8-4 in the attached MMRP (Appendix A).

#### **4.5.4 Conclusion**

The conclusions of the NFO Plan EIR relating to cultural resources remain valid. It appears none of the three (3) recorded Native American habitation sites identified in the NFO Plan EIR is located on the project site. However, Mitigation Measure 8-1 applies to the project and would be implemented in the event of inadvertent discovery of archaeological resources. Mitigation Measure 8-2 could apply if deemed necessary by the County. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR cultural resources impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant cultural resources impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.6 ENERGY

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>6. Energy. Would the project:</b>				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	NFO Plan EIR, p. 17-4.	No	No	NA
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA

### 4.6.1 Discussion

#### Would the project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

This significance criterion was not included in the NFO Plan EIR. The Plan EIR noted in Chapter 17, CEQA-Required Assessment Conclusions, that development under the Community Plan would irreversibly commit construction materials and non-renewable energy resources required for projects (EIR, p. 17-4). However, because development facilitated by the NFO Plan would be required to comply with California Code of Regulations (CCR) Title 24 energy regulations, the Plan would not be expected to use energy in a wasteful, inefficient, or unnecessary manner. The EIR concluded impacts of the Plan related to consumption of non-renewable and slowly renewable energy resources would be less than significant because the projects would not use unusual amounts of energy or construction materials.

Development under the Plan would consume energy for building space heating and cooling and water heating, and energy associated with water use and wastewater treatment. Energy use also includes natural gas consumption within the Plan Area as well as emissions outside the Plan Area from the generation of electricity (EIR, p. 7-15). New residential development and all substantial residential rehabilitation projects in the unincorporated County, including the Plan Area, are required to achieve LEED (Leadership in Energy and Environmental Design) Certification, or at least 50 or more GreenPoints on the appropriate GreenPoint Rated Checklist per the County's Green Building Ordinance (EIR, p. 7-13). Green building design features include, but are not limited to, features that promote water use efficiency; optimize energy performance and rely upon renewable energy sources; maintain minimum indoor environmental quality (including air quality, and light and noise levels); and support the responsible sourcing of building materials and storage and collection of construction and operational waste and recyclables. The County Green Building Ordinance is consistent with the State Building Energy

Efficiency Standards, which requires all new buildings in the state to incorporate energy saving features. Compliance with the Green Building Ordinance would ensure applicable development under the Plan would have a less than significant impact on the consumption of energy resources from project operations.

The project would consume energy resources from diesel fuels during project construction to power construction equipment, and from electricity and natural gas use during project operation. The project building would be required to comply with CCR Title 24 energy regulations, which would be enforced via the County Green Building Ordinance. The project is subject to and would comply with the County Green Building Ordinance, which would reduce potential impacts from the project's greenhouse gas emissions associated with energy use to less than significant.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

This significance criterion was not included in the NFO Plan EIR. See discussion under Section 4.6.1 a). The project is subject to and would comply with the County Green Building Ordinance, which is consistent with the State Building Energy Efficiency Standards. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

#### **4.6.2 Cumulative Discussion**

The NFO Plan EIR did not analyze the Plan's cumulative energy impacts. However, the NFO Plan EIR analyzed the Plan's impacts on non-renewable and slowly renewable resources and energy consumption and concluded they would be less than significant because projects implemented under the Plan would not use unusual amounts of energy or construction materials (EIR, p. 17-4). The Plan would be required to comply with California Code of Regulations (CCR) Title 24 energy regulations, which would reduce the potential for energy to be used in a wasteful, inefficient, or unnecessary manner. The NFO Plan EIR did not identify the use of energy resources under Plan implementation as a cumulatively considerable impact.

The project would consume both non-renewable energy resources for project construction and operations. The project is subject to and would comply with the County Green Building Ordinance and CCR Title 24.

#### **4.6.3 Mitigation Measures**

No significant impacts related to energy consumption and resources were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.6.4 Conclusion**

The conclusions of the NFO Plan EIR relating to energy resources remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR energy resources impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant energy resources impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.7 GEOLOGY AND SOILS

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>7. Geology and Soils. Would the project:</b>				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in: <ul style="list-style-type: none"> <li>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? <i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i></li> <li>ii. Strong seismic ground shaking?</li> <li>iii. Seismic-related ground failure, including liquefaction and differential settling?</li> <li>iv. Landslides?</li> <li>v. Coastal cliff/bluff instability or erosion? <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i></li> </ul>	NFO Plan EIR, p. 9-9.	No	No  Wayne Tig & Associates, Inc., Geotechnical Investigation Proposed Four-Story Hotel 2561-2567 El Camino Real Redwood City, California, May 2021	NA
b. Result in substantial soil erosion or the loss of topsoil?	NFO Plan EIR, pp. 9-9 to 9-10.	No	No  Wayne Tig & Associates, Inc., Geotechnical Investigation Proposed Four-Story Hotel 2561-2567 El Camino Real Redwood City, California, May 2021	NA
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral	NFO Plan EIR, pp. 9-9 to 9-10.	No	No  Wayne Tig & Associates, Inc.,	NA

spreading, subsidence, severe erosion, or collapse?			Geotechnical Investigation Proposed Four-Story Hotel 2561-2567 El Camino Real Redwood City, California, May 2021	
d. Be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property?	NFO Plan EIR, pp. 9-9 to 9-10.	No	No  Wayne Tig & Associates, Inc., Geotechnical Investigation Proposed Four-Story Hotel 2561-2567 El Camino Real Redwood City, California, May 2021	NA
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Scoped out at Notice of Preparation stage.  Resources do not exist in NFO Plan Area.	No	No	NA
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	NFO Plan EIR, p. 8-17.	No	No	Yes

### 4.7.1 Discussion

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:**
- i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**  
*Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.*
  - ii. **Strong seismic ground shaking?**
  - iii. **Seismic-related ground failure, including liquefaction and differential settling?**
  - iv. **Landslides?**
  - v. **Coastal cliff/bluff instability or erosion?**  
*Note: This question is looking at instability under current conditions. Future, potential instability is discussed in Section 4.8 (Climate Change).*



The NFO Plan EIR evaluated whether the implementation of the Plan would result in seismic hazards impacts (EIR, p. 9-9). The analysis noted that development and its occupants within the NFO Plan Area could be exposed to seismic hazards, including risk of loss, injury, or death. The main feature generating seismic activity in the San Francisco Bay region is the tectonic plate boundary between the North American and Pacific plates. Locally, this boundary is referred to as the San Andreas Fault Zone, which includes the San Andreas Fault and numerous other active faults. The active San Andreas Fault is oriented roughly parallel to the hills located southwest of the Plan Area, with a local splay, known as the Canada Fault.

The easternmost edge of the Alquist-Priolo Earthquake Fault Zone for the Canada Fault is located approximately three miles southwest of the NFO Plan Area, near Canada College and Interstate 280. Therefore, the potential for surface fault rupture within the NFO Plan Area is low.

County Hazards Mitigation maps, prepared using data from the Association of Bay Area Governments (ABAG), indicate that the NFO Plan Area has a moderate to high potential for liquefaction. Portions of the NFO Plan Area that are highly susceptible to liquefaction hazards would also be considered susceptible to lateral spreading. Additionally, portions of the NFO Plan Area that contain loose or uncontrolled (non-engineered) fill may be susceptible to differential settlement, and portions of the NFO Plan Area located within former tidal flats would be expected to be susceptible to settlement due to native soils of low strength and potential unconsolidated fill, and to differential settlement where fill abuts native soil.

No mitigation measures were required, as seismic hazards would be adequately mitigated by existing laws, regulations, and policies, including the California Building Code, site-specific geotechnical investigations required by the Seismic Hazards Mapping Act due to liquefaction hazards, and the County's development review procedures. The NFO Plan EIR therefore concluded that the NFO Plan's impacts related to seismic hazards would be less than significant.

Wayne Ting & Associates, Inc. (WTAI) prepared a geotechnical investigation for the project titled "Geotechnical Investigation Proposed Four-Story Hotel 2561-2567 El Camino Real Redwood City, California" and dated May 16, 2021. According to the investigation, the nearest active faults are the Monte Vista Fault and San Andreas Fault, located approximately three miles southwest and 4.2 miles southwest of the project site, respectively (WTAI 2021, p. 3). According to the California Department of Conservation, the project site is not located within a State-designated Earthquake Fault Zone (California Department of Conservation 2023). Therefore, fault rupture is not a significant geologic hazard at the site. The potential for lateral spreading at the project site is low due to the absence of open-faced slope in the vicinity (WTAI 2021, p. 5). The project site is not located on or adjacent to a coastal cliff or bluff, and therefore would not result in any impacts to coastal cliff or bluff instability or erosion. The flat topography of the project site and vicinity precludes the potential for landslides.

According to the California Department of Conservation, the project site is located within a State-designated Liquefaction Zone (California Department of Conservation 2023). The project site's underlying soils consist of highly expansive clay and silty sand soil types (WTAI 2021, p. 2). Therefore, there is a potential for liquefaction and liquefaction-induced differential seismic settlement on site due to the site's underlying soils (WTAI 2021, p. 6). To account for these potential risks, the project would incorporate the geotechnical report's recommendations for grading and excavation, foundation and structure design, pavement and parking lot design, trench backfill for new utilities infrastructure, and general construction requirements (WTAI 2021, pp. 5-8), subject to review and approval by the County.

**b) Result in substantial soil erosion or the loss of topsoil?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in soils-related hazards impacts (EIR, pp. 9-9 to 9-10). The analysis noted that soils within the NFO Plan Area are predominately clays and silty clays, which are expansive soils with high shrink-swell potential. However, the flat topography within the NFO Plan Area results in a low potential for soil erosion. The organic and expansive soils within the NFO Plan Area are subject to subsidence.

According to the NFO Plan EIR, no mitigation measures were required, as soils-related hazards would be mitigated by compliance with established State and County Code regulations for excavation, foundation design, and building construction, including the California Building Code and San Mateo General Plan, which require completion of site-specific design-level geotechnical investigations where necessary. Further, erosion and sedimentation control measures including dust control and timing of grading activity would be included as conditions of approval in the project staff report to ensure all disturbed areas are stabilized. These measures would be implemented prior to the commencement of any grading activity or construction work. The NFO Plan EIR therefore concluded the NFO Plan's impacts related to soils-related hazards would be less than significant.

The geotechnical investigation prepared for the project found that the site contains highly expansive surficial soils (WTAI 2021, p. 2). To reduce potential for damage to the proposed at-grade building and pavement, the project would implement the geotechnical report's site preparation, grading, and foundation design recommendations to reduce potential impacts to less than significant. In addition, the applicant has prepared an erosion control plan to control on-site erosion and off-site sedimentation during project construction activities. The project erosion control plan includes the temporary installation of fiber role sediment barriers around the perimeter of the project site, stormwater inlet protection devices, and a stabilized construction staging and wash area during the construction period (Figure 2-11 Erosion Control Plan). The project erosion control plan also includes erosion control notes, including the City's standard erosion notes, that would serve as BMPs to control erosion and off-site sedimentation during project construction. Implementation of the project erosion control plan would further reduce the potential for substantial soil erosion and the loss of topsoil.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, or collapse?**

See discussion under Section 4.7.1 a) and Section 4.7.1 b) on impacts related to seismic and soils-related hazards.

**d) Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?**

See discussion under Section 4.7.1 a) and Section 4.7.1 b) on impacts related to seismic and soils-related hazards.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

Impacts related to the use of septic tanks and alternative wastewater disposal systems were scoped out of the NFO Plan EIR at the Notice of Preparation stage because sewers are available throughout the NFO Plan Area.

The project would not use septic tanks or alternative wastewater disposal systems. The project

would not result in impacts related to septic tanks or alternative wastewater disposal systems.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in the disturbance of paleontological resources (EIR, p. 8-17). The analysis noted that ground-disturbing activities during previous development of the Plan Area would likely have disturbed, altered, or eliminated paleontological resources that may have existed within the Plan Area. However, development in accordance with the NFO Plan could potentially disrupt, alter, or eliminate as-yet undiscovered paleontological resources. This possibility represents a potentially significant impact. The NFO Plan EIR included Mitigation Measure 8-3, which requires certain procedures to be followed in the inadvertent discovery of paleontological resources. The NFO Plan EIR concluded that implementation of this measure would reduce the Plan's impacts to paleontological resources to less than significant.

In the event of an inadvertent discovery of paleontological resources, the project would comply with Mitigation Measure 8-3.

#### **4.7.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative geology and soils impacts (EIR, p. 9-10). The NFO Plan EIR concluded that the policies contained in the San Mateo County General Plan Soil Resources Element and Natural Hazards Element, along with mandated individual project compliance with federal, State, and local regulations addressing building construction, would render the contribution of the Plan to cumulative, Countywide geology and soils (except paleontological resources) impacts less than significant.

The project would be subject to and shall comply with the policies contained in the San Mateo County General Plan and with federal, State, and local regulations addressing building construction. A geotechnical investigation was prepared for the project. The project would be required to implement the recommendations contained in the project geotechnical investigation through the County development proposal review process.

The NFO Plan EIR analyzed the Plan's cumulative paleontological resources impacts in its analysis of cumulative cultural resources impacts (EIR, p. 8-18). The Plan EIR concluded that implementation of Mitigation Measure 8-3 would reduce the impacts of the Plan, and therefore reduce the Plan's contribution to significant cumulative impacts on paleontological resources to less than significant.

The project would also be subject to and comply with Mitigation Measure 8-3 regarding paleontological resources.

#### **4.7.3 Mitigation Measures**

See Mitigation Measure 8-3 in the attached MMRP (Appendix A).

#### **4.7.4 Conclusion**

The conclusions of the NFO Plan EIR relating to geology and soils remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR geology and soils impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and

could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant geology and soils impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.8 CLIMATE CHANGE

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>8. Climate Change. Would the project:</b>				
a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?	NFO Plan EIR, pp. 7-14 to 7-17.	No	No  Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	NA
b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	NFO Plan EIR, pp. 7-14 to 7-17.	No	No	NA
c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA

e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?	NFO Plan EIR, p. 11-14.	No	No	NA
f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	NFO Plan EIR, p. 11-13.	No	No	NA
g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?	NFO Plan EIR, p. 11-13.	No	No	NA

#### 4.8.1 Discussion

##### Would the project:

##### a) **Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to direct or indirect generation of greenhouse gas (GHG) emissions (EIR, pp. 7-14 to 7-17). The analysis noted that ongoing occupancy and operation of development under the NFO Plan would result in a net increase in CO<sub>2</sub> (carbon dioxide) and other greenhouse gas emissions due primarily to transportation, energy use and solid waste disposal. The NFO Plan EIR concluded that buildout of the NFO Plan Area under the Plan would result in annual GHG emissions of 115,122 metric tons of CO<sub>2</sub>e (carbon dioxide equivalent) in 2020 and 107,159 metric tons of CO<sub>2</sub>e in 2030. Based on a service population of 36,703 at buildout, the NFO Plan would result in CO<sub>2</sub>e emissions of 3.1 metric tons per year per the service population in 2020 and 2.9 metric tons per year per the service population in 2030. Estimated GHG emissions in both years would fall below the BAAQMD significance threshold of 4.6 metric tons per year per service population.

The project is consistent with the development assumptions of the NFO Plan EIR. The Commercial Mixed Use (Medium High Density) land use designation for the project site, permits hotel uses at the intensity proposed by the project (i.e., FAR of 1.5 and 69 hotel rooms).

Mobile sources (i.e., transportation emissions) are the most considerable contribution to greenhouse gas emissions. The NFO Plan EIR projects the Plan will result in an additional 30,200 daily vehicle trips, 2,060 morning peak hour trips, and 2,870 evening peak hour vehicle trips. At 277 daily vehicle trips, 25 morning peak hour trips, and 21 evening peak hour trips (Hexagon, p. 4), the project trip estimates are well within those assumed in the overall NFO Plan EIR. As such, the project's traffic-related GHG emissions are well within those projected in the NFO Plan EIR.

The project is subject to and would comply with the County Green Building Ordinance, which requires that the project either score 50 GreenPoints or higher on the appropriate GreenPoint

Rated Checklist, including the minimum number of points per category and meeting the prerequisites applicable on the appropriate GreenPoint Rated Checklist, or obtain LEED® certification.

Compliance with the Green Building Ordinance would further reduce the project's greenhouse gas emissions associated with energy use and solid waste disposal.

**b) Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

As discussed in Section 4.8.1 a), the project is subject to and would comply with the County Green Building Ordinance which requires the project either score 50 GreenPoints or higher on the appropriate GreenPoint Rated Checklist, including the minimum number of points per category and meeting the prerequisites applicable on the appropriate GreenPoint Rated Checklist, or obtain LEED® certification. The County Green Building Ordinance is included as a GHG reduction topic area in the San Mateo County Energy Efficient Climate Action Plan (2013), which contains goals and measures under 11 topic areas to reduce emissions. The project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, including the County Green Building Ordinance and the County Energy Efficient Climate Action Plan.

**c) Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?**

This significance criterion was not included in the NFO Plan EIR.

The project site is already developed with urban uses and does not contain forestland. Therefore, the project would not result in the loss of forestland or conversion of forestland to non-forest use, and no related impacts would occur.

**d) Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?**

This significance criterion was not included in the NFO Plan EIR.

The project site is not located on or adjacent to a coastal cliff or bluff and, therefore, the project would not expose structures or infrastructure to accelerated coastal cliff or bluff erosion due to rising sea levels, or otherwise. No impact would occur.

**e) Expose people or structures to a significant risk of loss, injury or death involving sea level rise?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in flooding impacts related to sea level rise (EIR, pp. 11-14 to 11-15). The analysis noted that regional sea level rise predictions for the San Francisco Bay region project a 16-inch rise in sea level by mid-century and a 55-inch rise by the end of the century. According to Bay Conservation and Development Commission (BCDC) maps of shoreline areas vulnerable to sea level rise, none of the Plan Area would be vulnerable to a 16-inch sea level rise and a limited number of parcels located on Bay Road, Spring Street, Willow Street, and Charter Street in the northwestern portion of the Plan Area may be vulnerable to a 55-inch sea level rise. With increased flooding potential in the future, development in accordance with the Plan could place people, structures, and other improvements at an increased risk of injury or loss from flooding.

To prevent significant impacts related to sea level rise, the NFO Plan EIR included Mitigation Measure 11-1, which requires implementation of flood damage avoidance requirements required for development within 100-year flood hazard area under the National Flood Insurance Program and County Code. See Mitigation Measure 11-1 in the attached MMRP (Appendix A).

The project site is located in an Area of Minimal Flood Hazard (Zone X), according to the FEMA's Flood Insurance Rate Maps (FIRM) (FEMA 2019). Further, according to the National Oceanic and Atmospheric Administration's (NOAA) Office for Coastal Management Sea Level Rise Viewer, the project site is not located in an area vulnerable to sea level rise (NOAA 2023). As such, the project would not expose people or structures to a significant risk of loss, injury, or death due to sea level rise. Mitigation Measure 11-1 does not apply to the project.

**f) Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in 100-year flood impacts (EIR, p. 11-13). The analysis noted that the NFO Plan Area contains no properties within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Maps (FIRM). Therefore, the NFO Plan EIR concluded that the NFO Plan would not place people or structures at unacceptable risk of injury or loss from flooding, and the flooding-related impacts of the NFO Plan would be less than significant.

According to FEMA's FIRM mapping (FEMA 2019), the project is not located in an existing 100-year flood hazard or special hazard area and, therefore, would not place structures in such an area.

**g) Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?**

See Section 4.8.1 e) and Section 4.8.1 f) for discussion of 100-year flood impacts.

## **4.8.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative GHG emissions (EIR, p. 7-16). The NFO Plan EIR concluded that the GHG emissions from ongoing occupancy and operation of development within the NFO Plan Area would represent a less-than-considerable contribution to the significant cumulative impact of global climate change.

The project is consistent with the assumptions of the NFO Plan EIR relating to GHG emissions impacts. The project would also be subject to and comply with the Green Building Ordinance, thus further reducing GHG emissions.

The NFO Plan EIR analyzed the Plan's cumulative flooding impacts from predicted sea level rise (EIR, p. 11-15). The NFO Plan EIR concluded that cumulative development in the low-lying areas near the San Francisco Bay could place people, structures, and other improvements at an increased risk of injury or loss, which could represent a significant cumulative impact. However, a portion of the Plan Area would be vulnerable to 16-inch sea level rise and implementation of Mitigation Measure 11-1 would reduce cumulative flooding impacts related to predicted sea level rise in the Plan Area to less than cumulatively considerable and less than significant.

The project is consistent with the assumptions of the NFO Plan EIR. The project site is not located in a 100-year flood hazard area or an area of special flood hazard. Therefore, the project is not subject to the projected 16- or 55-inch sea level rise and would not be subject to



Mitigation Measure 11-1.

### **4.8.3 Mitigation Measures**

No significant GHG emissions impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

Mitigation Measure 11-1 is not applicable.

### **4.8.4 Conclusion**

The conclusions of the NFO Plan EIR relating to climate change impacts remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR climate change impacts, including GHG emissions impacts and flooding impacts related to predicted sea level rise, were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant climate change impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.9 HAZARDS AND HAZARDOUS MATERIALS

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>9. Hazards and Hazardous Materials. Would the project:</b>				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?	NFO Plan EIR, p. 10-10.	No	No	NA
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	NFO Plan EIR, pp. 10-11 to 10-13.	No	No  Essel Environmental Engineering and Consulting, Phase I Environmental Site Assessment, Mixed-Use Property 2561-2567 El Camino Real & 11 Northumberland Avenue Redwood City, California 94063, Project No. 19264, October 2019	NA
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	NFO Plan EIR, p. 10-11.	No	No	NA
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	NFO Plan EIR, pp. 10-12 to 10-13.	No	No  Essel Environmental Engineering and Consulting, Phase I Environmental Site Assessment, Mixed-Use Property 2561-2567 El Camino Real & 11	NA

			Northumberland Avenue Redwood City, California 94063, Project No. 19264, October 2019	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?	Scoped out at Notice of Preparation stage.  NFO Plan Area not covered by an airport land use plan or within two miles of a public airport.	No	No	NA
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	NFO Plan EIR, p. 10-13.	No	No	NA
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Scoped out at Notice of Preparation stage.  NFO Plan Area not in the vicinity of wildlands.	No	No	NA
h. Place housing within an existing 100 year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	NFO Plan EIR, p. 11-13.	No	No	NA
i. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?	NFO Plan EIR, p. 11-13.	No	No	NA
j. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Scoped out at Notice of Preparation stage.  The Plan Area is not subject to flooding resulting from dam or levee failure.	No	No	NA

k. Inundation by seiche, tsunami, or mudflow?	<p>Scoped out at Notice of Preparation stage.</p> <p>The Plan Area is not located close enough to San Francisco Bay to be affected by a seiche. The Plan Area is not subject to tsunami inundation. The Plan Area is not subject to risk from mudflow.</p>	No	No	NA
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### 4.9.1 Discussion

#### Would the project:

**a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in hazardous materials transport, use or disposal impacts (EIR, p. 10-10). The NFO Plan EIR noted future non-residential development in accordance with the updated Community Plan could involve the storage, use and disposal of potentially hazardous materials, including building maintenance supplies, paints and solvents, pesticides and herbicides for landscaping and pest control, vehicle maintenance products, and the like. The County would require all new commercial, industrial, and other uses within the Community Plan area to follow applicable regulations and guidelines regarding the storage and handling of hazardous waste. Hazardous materials are required to be stored and handled according to manufacturer's directions and local, state, and federal regulations. Some of these regulations include posting of signs, Fire Department approval of Hazardous Materials Business Plans, and specialized containment facilities. The NFO Plan EIR concluded that the Plan's impacts associated with the transport, use, or disposal of hazardous materials are less than significant.

The proposed project is a hotel building. Hotel staff, including cleaning staff and maintenance and operations staff, would routinely use and dispose of common household hazardous materials, such as those described above. Any products that include hazardous materials would be disposed of pursuant to the County's Household Hazardous Waste Program.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts due to risk of upset or accidents (EIR, p. 10-11). It included a map of the locations of known hazardous materials release sites, in and near the Plan Area, including leaking underground storage tank (LUST) cleanup sites, State Response sites (confirmed release sites where the Department of Toxic Substances Control [DTSC] is involved in remediation), other DTSC cleanup sites, or other spill or leak investigation and cleanup sites (EIR, Figure 10.1, p. 10-3). Due to existing federal, State, and local regulation and oversight of hazardous materials, the NFO Plan EIR concluded that the Plan's impacts associated with the risk to the public or the

environment from upset and accident conditions involving the release would be less than significant.

The project site is currently developed with a restaurant (one single-story building), a salon (one two-story building), four apartment units (also located in the two-story building), a parking lot, a trash enclosure, and fencing. Adjacent uses include single-family and multi-family residences, commercial and retail facilities, and parking lots. The project site is not shown as a location of a known hazardous materials release site in NFO Plan EIR Figure 10.1. A Phase I Environmental Site Assessment (Phase I ESA) was prepared by Essel Environmental Engineering and Consulting ("Essel"), titled, "Phase I Environmental Site Assessment, Mixed-Use Property 2561-2567 El Camino Real & 11 Northumberland Avenue Redwood City, California 94063, Project No. 19264," and dated October 2019. The Phase I ESA was developed to identify Recognized Environmental Conditions (RECS) in connection with the previous and current uses and ownership of the project site. RECS include the presence or likely presence of hazardous substances or petroleum products on a property (in this case, the project site) under conditions that indicate a significant release or significant threat of a release into the ground, groundwater, or surface water. De minimis conditions (i.e., inconsequential conditions lacking significance) are not considered RECS.

The Phase I ESA investigated the historical use of the three project parcels through the review of historical records (Essel 2019, p. 2). The project site appears to have been occupied by a building as early as 1943. 11 Northumberland Avenue was occupied by a residence as early as 1943. 2561 El Camino Real was occupied by a restaurant as early as 1959; various retail businesses have since occupied the one-story building at 2561 El Camino Real. 2567 El Camino Real has been occupied by restaurants, retail businesses, and private residents over time following the construction of the existing two-story building in 1954. By 1974, the residence at 11 Northumberland Avenue had been redeveloped into the present-day parking lot. Historically, no issues of environmental concern were identified at any of the three parcels that constitute the project site. Further, the Phase I ESA noted no historical issues of environmental concern were identified at any of the properties in the site vicinity.

The Phase I noted the presence of three propane tanks, containers of cooking oil, dish soap, hand soap, all-purpose cleaner, bleach, window cleaner, condensed milk, food coloring, and other cooking materials associated with the bakery/café at 2561 El Camino Real; numerous containers of nail polish, rubbing alcohol, lotion, all-purpose cleaner, and other chemicals related to the hair salon business at 2567 El Camino Real; several spray bottles of household cleaners, a few bottles of bleach, hand soap, air fresheners, and other typical household and personal hygiene products in the apartment units; and a full 55-gallon drum of cooking oil located between the existing on-site buildings during the site reconnaissance conducted as part of the Phase I ESA (Essel 2019, p. 1).

The Phase I ESA concluded there are RECs conditions associated with the project site (Essel 2019, p. 3). One de minimis condition is present on site: one full 55-gallon stainless steel drum of used cooking oil stored in the alleyway between the two buildings. No secondary containment was observed below the drum, and signs of spills on the surrounding floor and walls were observed. According to the Phase I ESA, because of the nature of the contents and the concrete-paved underlying floor, it is unlikely that spills from the AST impacted the subsurface. The Phase I ESA recommended no further investigation of the site at this time (i.e., as of 2019).

There is the potential for hazardous materials spills or releases to have occurred following the completion of the Phase 1 ESA in October 2019. As discussed above, the project site is not shown as a location of a known hazardous materials release site in Plan EIR Figure 10.1. However, Figure 10.1 shows a hazards materials release site located in the vicinity northwest of

the project site. The nearby hazardous materials release site is listed as a California State Water Board Spills, Leaks, Investigation, and Cleanup (SLIC) site in Plan EIR Figure 10.1. According to the Phase I ESA, the nearby SLIC site, located at 2537 El Camino Real approximately 226 feet north-northwest of the project site, is the former Beach Cleaners/Clean N Press/Clean N Press For Less (“Beach Cleaners”) site (Essel 2019, p. 25). According to the Phase I ESA, the site was occupied by a dry-cleaning facility from 1988 to 1997. The facility underwent soil and groundwater testing for potential contaminants related to dry-cleaning operations beginning in 1997. Testing confirmed the presence of tetrachloroethene (PCE) on site. Soil excavation and groundwater extraction took place on March 31, 1998, and groundwater monitoring wells were installed north of the facility in the downgradient direction on September 3, 1998. The monitoring wells confirmed the source of the soil and groundwater contamination had been removed and the levels of contamination had been reduced. A No Further Action (NFA) letter was issued for this facility on February 16, 2001, by the San Francisco Bay Regional Water Quality Control Board (RWQCB) stating that no further active remediation or monitoring is required.

Due to the success of the cleanup actions and the contaminants having migrated north away from the site, the Phase I ESA concluded the former Beach Cleaners site is not expected to be of significant concern to the site. The State Water Board’s GeoTracker database supports this conclusion. The former Beach Cleaners site (SLT2O226322) has a status of “Complete – Case Closed” as of 5/6/2009, meaning a closure letter or other formal closure decision document has been issued for the site (State Water Board 2023). The site’s GeoTracker entry notes contaminated soils were excavated and removed and groundwater was extracted from the area. Some contaminated soil could not be excavated due to the soil’s proximity to the building foundation, but a vapor barrier and passive venting system were installed as mitigation. As such, the proximity of the project site to the Beach Cleaners site is not likely to result in adverse environmental effects.

There is one additional hazardous materials site located in the project vicinity. GeoTracker lists the Target Stores site (T0608100531), located approximately 490 feet north of the project site at 2485 El Camino Real, a former leaking underground storage tank (LUST) site. The contaminant of concern at the Target Stores site was gasoline, which leaked into surrounding soils and groundwater. To mitigate the on-site hazardous materials leak, contaminated materials were excavated (soils) or pumped and treated (groundwater). Currently, the site has a cleanup status of “Completed – Case Closed” as of 3/22/2001. Due to the intervening distance between the Target Stores site and the previously undertaken actions to remedy the LUST conditions at the Target Stores site, the Target Stores site is not expected to be of significant concern to the project site. There are no other sites which are included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 in the project vicinity (CalEPA 2023, DTSC 2023).

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in impacts related to asbestos and lead-based paint exposure (EIR, pp. 10-11 to 10-12). The analysis noted that existing structures within the NFO Plan Area may contain asbestos-containing insulation, siding, finishes and other asbestos-containing building materials, and, depending on the period in which the buildings were constructed, may contain lead-based paint. As such, asbestos or lead-based paint present within older structures could be released into the environment during demolition or construction activities, which could result in soil contamination or pose a health risk to construction workers or future occupants if not managed in accordance with existing laws and regulations.

Any building demolition or rehabilitation activities within the NFO Plan Area would be required to comply with regulations pertaining to the removal and proper disposal of asbestos and lead-based paint. Section 19827.5 of the California Health and Safety Code requires that local

agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. Additionally, the demolition or removal of asbestos-containing building materials is subject to the limitations of BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing, which requires special handling of asbestos-containing material (e.g., by keeping materials continuously wetted). The Rule prohibits any visible emissions of asbestos-containing material to outside air.

California Occupational Safety and Health Administration (CalOSHA) regulates worker exposure to lead-based paint during construction through respiratory protection, protective clothing, and hygiene facilities. A CalOSHA certified asbestos and lead-based paint contractor would prepare a site-specific asbestos and lead hazard control plan with recommendations for the containment of asbestos or lead-based paint materials during demolition activities, for appropriate disposal methods and locations, and for protective clothing and gear for abatement personnel.

The Phase I ESA concluded that due to the age of the two on-site buildings (1954), asbestos-containing materials (ACM) and/or lead-based paint (LBP) may be present (Essel 2019, p. 3). The project proposes to remove the existing on-site structures. The Phase I ESA recommends continued sampling and testing for suspect building materials and surfaces for ACMs and LBP prior to any substantial renovation or demolition activities and the preparation of an operations and maintenance (O&M) plan for the building to maintain presumed and identified materials in-place prior to abatement activities (Essel 2019, pp. 3-4). The project shall comply with all applicable Health and Safety Codes, BAAQMD, and CalOSHA regulations pertaining to the removal and proper disposal of asbestos and lead-based paint, as noted in the NFO Plan EIR.

Project operations would include routine use of common household chemicals. Hazardous waste from household chemicals would be disposed of according to local, State, and federal hazardous materials and waste regulations.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to hazardous materials near schools, and concluded that the Plan's impacts would be less than significant (EIR, p. 10-11). The analysis noted that there are a number of schools located within the NFO Plan Area or within ¼-mile of the Plan Area. The NFO Plan EIR concluded that with existing federal, State, and local regulation and oversight of hazardous materials, the potential impact to these schools from additional hazardous materials transport, use, or disposal in the NFO Plan Area, or from the risk of upset and accident conditions involving the release of hazardous materials, would be less than significant.

The project is a hotel building. Routine transport, use, or disposal of hazardous materials would be limited to common household hazardous waste and chemicals. There are no schools on the project site. The closest school, Hoover Elementary School, is located approximately 0.5 miles north at 701 Charter Street. The project's potential impact on the nearest school from hazardous materials transport, use, or disposal would be less than significant due to intervening distance and structures, and existing local, State, and federal oversight and regulation.

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

See discussion under Section 4.9.1 b) regarding impacts due to reasonably foreseeable upset or accident conditions.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

Safety hazard impacts related to public airports and public use airports were scoped out of the Plan EIR at Notice of Preparation stage as the NFO Plan Area is not covered by an airport land use plan or within two (2) miles of a public airport/public use airport.

The project site is not covered by an airport land use plan, nor is it within two miles of a public airport or public use airport.

The project site is not in the vicinity of a private airstrip.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in emergency response impacts (EIR, p. 10-13). The San Mateo County Sheriff's Office, Office of Emergency Services provides disaster planning for all types of natural and technological disasters. The EIR analysis noted that following established County practice, a traffic control plan would be developed and implemented by the County for each individual project affecting a major travel route in order to maintain access to properties within the project limits and emergency access to and through the Plan Area, and to minimize traffic disruption, congestion, and traffic safety hazards. Any need for traffic lane reductions or street closure due to construction would be short-term, temporary, and localized, and adequately managed through standard County traffic management practices implemented in the traffic control plan. The NFO Plan EIR concluded that the Plan would not interfere with emergency response or evacuation, or interfere with locally-adopted emergency response or evacuation plans. Therefore, the potential impact of the NFO Plan on emergency response would be less than significant.

The project applicant shall submit a traffic control plan, as required by standard County practice, to manage any congestion caused by the project during construction and operation.

- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

Impacts related to wildland fires were scoped out of the Plan EIR at Notice of Preparation stage as the NFO Plan Area is not in the vicinity of wildlands.

The project site is not in the vicinity of wildlands. See Section 4.20, Wildfire, below.

- h) Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

See Section 4.8, Climate Change, for discussion of potential flooding impacts due to predicted sea level rise.

- i) Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?**



See Section 4.8, Climate Change, for discussion of potential flooding impacts due to predicted sea level rise.

**j) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

Impacts related to failure of a levee or dam were scoped out of the NFO Plan EIR at the Notice of Preparation stage as there are no levees or dams in the vicinity of the NFO Plan Area. The Plan Area is not subject to flooding resulting from dam or levee failure.

The project site is not in the vicinity of any levees or dams.

**k) Inundation by seiche, tsunami, or mudflow?**

Impacts related to inundation by seiche, tsunami, or mudflow were scoped out of the NFO Plan EIR at the Notice of Preparation stage. The Plan Area is not located close enough to San Francisco Bay to be affected by a seiche. The Plan Area is not subject to tsunami inundation. The Plan Area is not subject to risk from mudflow.

According to the California Department of Conservation, the project site is not located in a State-designated tsunami hazard area (California Department of Conservation 2021). As such, the project site would not be subject to tsunami inundation. As noted above, the project site is not located close enough to San Francisco Bay to be affected by a seiche. The project site is flat and far from hillsides; as such, the site is not subject to risk from mudflow. Therefore, the project would have no impact related to seiche, tsunami, or mudflow.

## **4.9.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative hazards and hazardous materials impacts (EIR, p. 10-13). The NFO Plan EIR concluded that with applicable federal and State laws, regulations, standards and oversight, and local policies and programs, the cumulative impact to the public or the environment from hazardous materials would be less than significant.

The project would be subject to and comply with applicable Federal and State laws, regulations, standards and oversight, and local policies and programs.

## **4.9.3 Mitigation Measures**

No significant hazards and hazardous materials impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

## **4.9.4 Conclusion**

The conclusions of the NFO Plan EIR relating to hazards and hazardous materials remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR hazards and hazardous materials impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant hazards and hazardous materials impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.10 HYDROLOGY AND WATER QUALITY

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>10. Hydrology and Water Quality. Would the project:</b>				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?	NFO Plan EIR, pp. 11-11 to 11-13.	No	No	NA
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Scoped out at Notice of Preparation stage.  No impact on groundwater resources is expected because the Plan Area is predominantly developed.	No	No	NA
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: i) Result in substantial erosion or siltation on- or off-site; ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) Create or contribute runoff water which would exceed	NFO Plan EIR, pp. 11-11 to 11-13.	No	No	NA

	the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) Impede or redirect flood flows?				
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	[Flood Hazard] NFO Plan EIR, p. 11-13.  [Tsunami and Seiche] Scoped out at Notice of Preparation stage.  The Plan Area is not located close enough to San Francisco Bay to be affected by a seiche. The Plan Area is not subject to tsunami inundation.	No	No	NA
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	NFO Plan EIR, pp. 11-11 to 11-13.	No	No	NA
f.	Significantly degrade surface or groundwater water quality?	NFO Plan EIR, pp. 11-11 to 11-13.	No	No	NA
g.	Result in increased impervious surfaces and associated increased runoff?	NFO Plan EIR, pp. 11-11 to 11-13.	No	No	NA

#### 4.10.1 Discussion

##### Would the project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in construction period water quality impacts (EIR, pp. 11-11 to 11-12). The analysis noted that construction activities within the Plan Area may substantially degrade the quality of downstream

receiving waters and waters of the San Francisco Bay. Without proper controls, construction activities, in particular activities involving soil disturbance, excavation, cutting/filling, and grading could result in increased erosion on site and sediments, pollutants, and excess nutrients being carried to receiving waters, which could increase turbidity and sedimentation, disrupt aquatic habitats, impair beneficial uses, and violate waste discharge requirements. Storage of excavated soil and pavement on a project site and subsequent off-site hauling could expose this material to both wind and water erosion that could adversely affect downstream drainage facilities and waterways. In addition, spilled or improperly used construction materials, such as fuel, paint, cement, or solvents, could be washed into Plan Area storm drains or seep into the underlying groundwater.

However, any individual private development or public improvement project that would disturb an area larger than one (1) acre or create 10,000 square feet or more of impervious surface area would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Permit from the State Water Board. The terms of this permit require applicants to prepare a Stormwater Pollution Prevention Plan (SWPPP) to demonstrate that project development (construction and operation) would not cause any increase in sedimentation, turbidity, or hazardous material concentrations within downstream receiving waters. Design requirements and implementation measures for individual development-specific erosion and sedimentation controls would be set forth in the applicant's SWPPP in accordance with State and State Water Board design standards and with the County's NPDES Permit Requirements Checklist and Stormwater Pollution Prevention Program. During construction, the County Public Works Department would monitor implementation of the development's approved SWPPP, with a particular focus on erosion control. The NFO Plan EIR concluded that potential construction period water quality impacts of the NFO Plan would be adequately controlled through the implementation of existing County and State Water Board requirements and, therefore, would be less than significant.

The project site is less than one (1) acre in size and the project does not propose over 10,000 sq. ft. of *net new* impervious surface area; therefore, the project would not be required to obtain an NPDES General Construction Permit from the State Water Board. The project would prepare and implement a SWPPP explaining how the project would not result in any increase in sedimentation, turbidity, or hazardous material concentrations within downstream receiving waters. The SWPPP would include design requirements and implementation measures for erosion and sediment control.

Implementation of the SWPPP in compliance with the County NPDES Permit would ensure the project does not violate any water quality standards or waste discharge requirements.

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in long-term water quality impacts (EIR, pp. 11-12 to 11-13). The analysis noted that stormwater runoff from within the Plan Area, if not properly controlled before discharge, could substantially degrade water quality, disrupt aquatic habitats, impair beneficial uses, or violate waste discharge requirements. Trash, particulate matter, oil, grease, and building chemicals that collect on streets, parking areas, roofs, open storage areas, and other impervious surfaces are then washed into drainages and could impair runoff water quality. Increased use of herbicides, pesticides, and fertilizers associated with landscaping could also contaminate receiving waters. The number of vehicle trips generated within the Plan Area is also expected to increase, which is expected to result in a proportionate increase in the deposition of vehicle-related pollutants. New commercial operations could contaminate surfaces if potential pollutants are spilled or stored or disposed of improperly.

The San Francisco Bay Water Board Municipal Regional Permit Provision C.3 requirements

apply to projects that create or replace more than 10,000 square feet of impervious area (5,000 square feet for certain types of projects). Project applicants are required to develop and implement best management practices required by the San Mateo County's Countywide Storm Water Pollution Prevention Program (STOPPP). Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity. Measures to implement these regulatory requirements include non-point source pollutant controls, and active pre-discharge and passive pre-discharge treatment controls. The NFO Plan EIR concluded that the potential long-term water quality impacts of the Plan would be adequately controlled through the implementation of existing County and Water Board requirements and therefore, would be less than significant.

Currently, the project site contains 638 sq. ft. of pervious area and 11,850 sq. ft. of impervious surface area. Post-project, the project site would have 1,890 sq. ft. of pervious area and 10,598 sq. ft. of impervious area, resulting in the replacement of 10,598 sq. ft. of impervious surface area and a net decrease of 1,252 sq. ft. of impervious surface area. As the project would replace more than 10,000 square feet of impervious area, it would be subject to the San Francisco Bay Water Board Municipal Regional Permit Provision C.3 requirements. The project would also comply with the STOPPP and prepare and implement a Stormwater Control Plan and a Stormwater Facility Operation and Maintenance Plan.

Implementation of these project stormwater management plans in compliance with regional and County regulations will ensure the project does not violate any water quality standards or waste discharge requirements.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Impacts related to depleted groundwater supplies were scoped out of the NFO Plan EIR at the Notice of Preparation stage. No impact on groundwater resources is expected because the Plan Area is predominantly developed.

The project would not use or interfere with groundwater and, therefore, would not result in groundwater-related impacts.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:**

**i) Result in substantial erosion or siltation on- or off-site;**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in stormwater drainage system impacts (EIR, p. 11-11). The analysis noted that future development in accordance with the NFO Plan would mostly consist of alterations of, additions to, and redevelopment of existing improved properties. While land uses and the density and intensity of development may change, there would be limited change from existing conditions in terms of impervious surface area and stormwater runoff. Development may result in increased impervious area on some parcels. New development would be required to implement on-site stormwater detention so that there is no increase in stormwater runoff from the site during a 10-year storm event. New development would be required to implement Low Impact Development

(LID) measures, such as water reclamation and bioretention, that promote storage and treatment of stormwater. The LID measures can be on site, regional or a combination thereof. There is no requirement for existing development to correct current problems. Proposed fill may be required to be offset by storage such that there is no net impact on flood levels. Therefore, the NFO Plan EIR concluded that impacts of the Plan on storm drainage would represent a less than significant impact.

The project site currently contains a restaurant, salon, and commercial parking lot, and the majority of the project site is covered by impervious surfaces. The project would be required to implement LID measures to store and treat stormwater, and other measures that would result in no increase in stormwater runoff from the site during a 10-year storm event. The project proposes the construction of one self-retaining area (permeable pavement), one self-treating area (permeable pavement), and two bio-retention areas to collect and treat on-site stormwater runoff. In addition, the hotel building would be outfitted with gutters, and the project site would be developed with underground storm drain lines and two pump stations to collect and treat stormwater before conveying runoff to the storm drain main along El Camino Real and curb drain on Northumberland Avenue.

**ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

See Section 4.10.1 a) for a discussion of stormwater drainage system impacts.

**iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

See Section 4.10.1 a) for a discussion of stormwater drainage system impacts.

See Section 4.19, Utilities and Service Systems, for a discussion of wastewater collection impacts.

**iv) Impede or redirect flood flows?**

See Section 4.8, Climate Change, for discussion of potential 100-year flood impacts.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

The NFO Plan EIR noted that the NFO Plan Area contains no properties within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Maps (FIRM) (p. 11-13).

The project site is not located in a flood hazard area.

Impacts related to inundation by seiche and tsunami were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

According to the California Department of Conservation, the project site is not located in a State-designated tsunami hazard area (California Department of Conservation 2021). As such, the project site would not be subject to tsunami inundation. As noted above, the project site is not located close enough to San Francisco Bay to be affected by a seiche.

Therefore, the project would have no impact related to flood hazard, tsunami, or seiche.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

See Section 4.10.1 a) for discussion of construction period and long-term water quality impacts.

Impacts related to depleted groundwater supplies were scoped out of the NFO Plan EIR at the Notice of Preparation stage. The project would not use or interfere with groundwater and, therefore, would not result in related impacts.

**f) Significantly degrade surface or groundwater water quality?**

See Section 4.10.1 a) and Section 4.10.1 e) for discussion of construction period and long-term water quality impacts.

**g) Result in increased impervious surfaces and associated increased runoff?**

See Section 4.10.1 a) for a discussion of stormwater drainage system impacts.

#### **4.10.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative hydrology and water quality impacts (EIR, pp. 11-15 to 11-16). The NFO Plan EIR concluded that the contribution of the NFO Plan to potentially significant cumulative hydrology and water quality impacts is not considered cumulatively considerable because each new development would be required to mitigate its own site-specific impacts. Project applicants would also be required to develop and implement BMPs required by the San Mateo County's STOPPP. Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

The project would be subject to compliance with these requirements in the conditions of approval in the project staff report.

#### **4.10.3 Mitigation**

No significant hydrology and water quality impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.10.4 Conclusion**

The conclusions of the NFO Plan EIR relating to hydrology and water quality remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR hydrology and water quality impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant hydrology and water quality impacts resulting from the project.

Therefore, no additional analysis under CEQA is required for the project.

## 4.11 LAND USE AND PLANNING

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>11. Land Use and Planning. Would the project:</b>				
a. Physically divide an established community?	NFO Plan EIR, pp. 12-16 to 12-17.	No	No	NA
b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	NFO Plan EIR, pp. 12-18 to 20.	No	No	NA
c. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
d. Conflict with any applicable habitat conservation plan or natural community conservation plan?	Scoped out at Notice of Preparation stage. Resources do not exist in the NFO Plan Area.	No	No	NA
e. Result in the congregating of more than 50 people on a regular basis?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
f. Result in the introduction of activities not currently found within the community?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA



g. Create a significant new demand for housing?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
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### 4.11.1 Discussion

#### Would the project:

##### a) Physically divide an established community?

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts associated with the physical arrangement of the community (EIR, pp. 12-16 to 12-17). The analysis noted the existing arrangement of the community. The neighborhood commercial uses are located along commercial corridors such as portions of Middlefield Road and 5<sup>th</sup> Avenue. Existing general commercial uses are located along El Camino Real and portions of Middlefield Road. Industrial uses are concentrated along portions of the SPR tracks and to the north of Fair Oaks Avenue west of 2nd Avenue. The railroad tracks, the parcels along the tracks, and 13.8 acres of vacant property divide the neighborhoods.

The NFO Plan includes numerous objectives, goals, policies, development standards, and design guidelines designed specifically to improve the existing physical connections (for pedestrians, bicycles, transit, and vehicles), and create new connections between the neighborhoods of North Fair Oaks and between North Fair Oaks and surrounding communities. These improved connections would provide a land use context more supportive of pedestrians and bicycles and increasing pedestrian and bicycle safety. Additionally, Plan-facilitated infill development on vacant land and intensification and revitalization of underutilized properties would result in more consolidated, coherent, and compatible land use patterns and physical connections, as well as a more unified development character.

The NFO Plan EIR concluded that the impacts of the Plan on the physical arrangement and cohesion of the North Fair Oaks community and surrounding communities would represent a beneficial effect.

The project site consists of three parcels, one of which is designated as underutilized under the NFO Plan (NFO Plan, Figure 2.6, p. 42). The redevelopment of the three project parcels would utilize the site for the intended regional serving uses, encouraging redevelopment of the El Camino Real commercial corridor, as envisioned by the NFO Plan. The project would be subject to and comply with the NFO objectives, goals, policies, development standards, and design guidelines intended to improve and create physical connections.

##### b) Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts due to inconsistencies with plans and policies (EIR, pp. 12-18 to 12-20). The analysis noted that the NFO Plan would be substantially consistent with, and would serve to implement, applicable policies of the San Mateo County General Plan. NFO Plan Land Use Goal 2.3 requires the

County to “[u]pdate the County’s General Plan map and zoning ordinance to be consistent with the new Plan land use map and land use designations for North Fair Oaks.” According to the NFO Plan, Goal 2.3 will, “strengthen neighborhood and community character and to incentivize needed and appropriate development.” The NFO Plan was closely coordinated with the County’s Housing Element, as well as the County’s ongoing update to the Housing Element to address critical needs and priorities in North Fair Oaks in a consistent manner.

The NFO Plan is also considered substantially consistent with the Metropolitan Transportation Commission’s Transportation 2035 Plan primarily because the NFO Plan designated and would facilitate future growth near potential new transit opportunities. The NFO Plan EIR also concluded that the NFO Plan is substantially consistent with the FOCUS Program, the Middlefield Pedestrian Safety Project, the California High Speed Rail Project, and the Dumbarton rail corridor project. Based on these conclusions, the NFO Plan EIR considered the NFO Plan substantially consistent with other applicable land use plans, policies, and regulations, thereby resulting in a less than significant impact.

The project complies with the NFO Plan, as the NFO Plan is a component of the County’s General Plan (Board of Supervisors, Resolution Nos. 071714 – 071715). See Section 4.1.1 a) and Section 4.1.1 f) for discussion of the project’s consistency with the NFO Plan and the development, design, and performance standards of the CMU-1 Zoning District.

See Section 4.4, Biological Resources. The NFO EIR noted special-status species are not expected to occur within the NFO Plan Area because of a lack of suitable habitat, the small size and fragmented nature of remaining habitat, prior disturbance, and the current level of human activity. Impacts to riparian habitat, federally protected wetlands, and other sensitive natural communities were scoped out of the NFO Plan EIR at the Notice of Preparation stage because said resources do not exist in the Plan Area. The Plan EIR did not analyze potential impacts to marine and wildlife reserves or oak woodlands and non-timber woodlands because these resources do not occur in the Plan Area. Wildlife use within the NFO Plan Area is expected to be relatively low due to the absence of natural habitat, the proximity of streets and development, and the lack of protective cover. The NFO Plan Area is limited in its function for wildlife movement due to its extensively developed nature. However, construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment in the Plan Area, which represents a potentially significant impact. As a result, the NFO Plan EIR concluded the Plan would have a less than significant impact to biological resources with implementation of Mitigation Measure 6-1, which requires specific timing of tree removal/trimming as well as ground-disturbing activities.

The project site is already developed and contains no natural habitat. As a result, Mitigation Measure 6-1 does not apply to the project.

See Section 4.10, Hydrology and Water Quality. The NFO Plan EIR concluded the Plan would not have significant impacts on hydrology and water quality. The project would implement LID measures to collect and treat stormwater on site and would comply with applicable water quality control standards and regulations through the development and implementation of a Stormwater Control Plan and a Stormwater Facility Operation and Maintenance Plan.

The project would not conflict with any applicable County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- c) **Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?**

This significance criterion was not included in the NFO Plan EIR.

The project would develop a 69-room hotel building where a restaurant, salon, apartment units, and a parking lot are currently located. While the project would increase the development intensity of an already developed area through redevelopment of the project site, the NFO Plan identified one of the project parcels as an underutilized parcel (NFO Plan, Figure 2.6, p. 42), and the NFO Plan supports the new development and redevelopment of underutilized land throughout the Plan Area as key goals of the NFO land use designations (NFO Plan, p. 20). The project would require the upscaling of off-site sanitary sewer mains and water mains and new connections for electricity, natural gas, sanitary sewer, and water (domestic, irrigation, and fire); also, the project would add new connections to existing utility mains, improve existing connections, and upscale existing utility mains rather than introduce new or expanded public utilities. Utility improvements would serve only the project site and would not extend to off-site locations nor encourage off-site development. The project would include an open-air patio garden and hotel lounge; these facilities would be fully contained on site and would not be accessible to the general public. The project consists of the introduction of a new commercial facility; the introduction of this new commercial facility is consistent with the development intensity intended in the CMU-1 District. As such, the project hotel building would not increase development intensity in a way that constitutes a significant impact.

While the project would increase the development intensity of the project site, the redevelopment would be consistent with the NFO Plan, which supports the redevelopment of underutilized land through NFO Plan Goal 2.2.

**d) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

Impacts related to conflicts with adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other habitat conservation plans were scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The project is not within a habitat conservation plan or a natural community conservation plan.

**e) Result in the congregating of more than 50 people on a regular basis?**

This significance criterion was not included in the NFO Plan EIR. As a hotel development, the project would result in the congregating of more than 50 guests on a regular basis. However, guests would not permanently occupy the project building and the number of hotel guests present in the project building at any one time would be limited to an extent by the number of hotel guestrooms. Project operations would be fully contained within the project site and would not result in any impacts.

**f) Result in the introduction of activities not currently found within the community?**

This significance criterion was not included in the NFO Plan EIR. However, the NFO Plan EIR notes that existing land uses in North Fair Oaks can be classified into four general categories: residential (365.2 acres), commercial (41.3 acres), industrial (117.2 acres), and institutional/public (33.5 acres). The remaining approximately 240 acres are dedicated to road and railroad rights-of-way. Existing general commercial uses are located along El Camino Real and portions of Middlefield Road. Approximately 23.2 acres of commercial parcels are either vacant or underutilized; these are concentrated along Middlefield Road and El Camino Real.

The proposed project is a hotel development with 69 guest rooms. The NFO Plan Area currently

contains several hotels located along El Camino Real. Additional hotels are located in the immediate vicinity of the Plan Area along El Camino Real. The project would not introduce activities not currently found in the community, as hotel uses currently exist in and adjacent to the Plan Area along El Camino Real.

**g) Create a significant new demand for housing?**

This significance criterion was not included in the NFO Plan EIR.

As a hotel development, the project would accommodate temporary guests and would not create a significant new demand for housing.

#### **4.11.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative impacts related to land use and planning (EIR, p. 12-20). The NFO Plan EIR concluded that the NFO Plan would result in beneficial effects on the physical arrangement of the community and substantial conformance with other applicable plans, policies, and regulations. Therefore, these effects would collectively constitute a less than considerable, and therefore less than significant, contribution to associated cumulative land use impacts.

The project is consistent with the land use standards, guidelines, and policies of the NFO Plan, and does not conflict with other applicable plans, policies, and regulations.

#### **4.11.3 Mitigation Measures**

No significant land use and planning impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.11.4 Conclusion**

The conclusions of the NFO Plan EIR relating to land use and planning remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR land use and planning impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant land use and planning impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.12 MINERAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>12. Mineral Resources. Would the project:</b>				
a. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?	Scoped out at Notice of Preparation stage.  Mineral resources do not exist in NFO Plan Area.	No	No	NA
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	Scoped out at Notice of Preparation stage.  Mineral resources do not exist in NFO Plan Area.	No	No	NA

### 4.12.1 Discussion and Conclusion

Mineral resource impacts were scoped out of the NFO Plan EIR at the Notice of Preparation stage because no mineral resources exist in the NFO Plan Area, and the Plan Area is already developed with urban land uses. The project site does not contain any mineral resources. The project would have no impact on mineral resources.

## 4.13 NOISE

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>13. Noise. Would the project result in:</b>				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	NFO Plan EIR, pp. 13-12 to 13-16, 13-19 to 13-21.	No	No	Yes
b. Generation of excessive ground-borne vibration or ground-borne noise levels?	NFO Plan EIR, pp. 13-16 to 13-19.	No	No	Yes
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?	<p>[Airport Land Use Plan/Public Airport] Scoped out at Notice of Preparation stage.</p> <p>The project is outside the noise contours published in San Carlos Airport Land Use Plan.</p> <p>[Private Airstrip] Criterion not included in the NFO Plan EIR.</p> <p>The project is not located near a private airstrip.</p>	No	No	NA

### 4.13.1 Discussion

#### Would the project:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to demolition and construction period noise (EIR, pp. 13-12 to 13-16). The analysis noted that demolition and construction activities associated with the NFO Plan could temporarily

increase noise levels at nearby residential and commercial sensitive receptors. Noise levels at 50 feet from the demolition or construction equipment source could reach approximately 105 dBA, resulting in intermittent interference with typical existing residential and business activities, and exceeding the County's noise ordinance limits. This possibility represents a potentially significant impact.

To mitigate the potential impacts resulting from demolition and construction of development within the NFO Plan Area, the NFO Plan EIR included Mitigation Measure 13-1, which requires a Construction Plan that will identify a procedure for coordination with nearby noise-sensitive facilities so that construction activities can be scheduled to minimize noise disturbance.

Mitigation Measure 13-1 also requires that construction be limited to between the hours of 7:00 a.m. and 6:00 p.m. weekdays, and between 9:00 a.m. and 5:00 p.m. on Saturdays. Demolition and construction equipment controls are also required under Mitigation Measure 13-1. See Mitigation Measure 13-1 in attached MMRP (Appendix A). With implementation of Mitigation Measure 13-1, the NFO Plan EIR concluded that the NFO Plan would result in less than significant intermittent, short-term, project construction-period noise impacts.

The project would be required to comply with the demolition and construction controls of the Mitigation Measure 13-1 in order to reduce any impacts related to construction-period noise.

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in impacts associated with exposure to noise levels exceeding standards (EIR, pp. 13-19 to 13-20). The analysis noted that multi-family residential and other noise-sensitive land uses within the Plan Area would be exposed to various existing and anticipated noise sources, including traffic, Caltrain, and Dumbarton rail operations. Where projected future exterior noise levels exceed 60 dBA CNEL, interior noise levels may exceed the California Building Code standard of 45 dBA CNEL or County noise standards. Specifically, land uses proposed within 200 to 300 feet of the Caltrain line and the proposed Dumbarton rail corridor and within 120 feet of the centerline of El Camino Real and other major roadways would be exposed to noise levels of 60 dBA CNEL or higher. This would represent a potentially significant impact.

To mitigate these potentially significant impacts, the NFO Plan EIR included Mitigation Measure 13-4, which requires a noise study for sensitive uses within 120 feet of the centerline of El Camino Real. The noise study must identify noise reduction measures necessary to achieve compatibility with County noise standards and California Building Code noise compatibility standards. See Mitigation Measure 13-4 in the attached MMRP (Appendix A). With implementation of Mitigation Measure 13-4, the NFO Plan EIR concluded that the Plan would result in less than significant impacts related to exposure to noise levels exceeding standards.

The project is located within 120 feet of the centerline of the El Camino Real. According to the San Mateo County General Plan, noise sensitive land uses include "residential and the following institutional uses: hospitals, schools, and libraries" (San Mateo County General Plan Noise Policy 16.7, p. 16.2P). Because hotel land uses do not fall under the definition of noise sensitive land uses in the General Plan, the project's proposed hotel land use is not considered a noise sensitive land use. As such, while the proposed hotel building would be located within 120 feet of the centerline of El Camino Real, a noise study for sensitive uses is not required, and Mitigation Measure 13-4 does not apply. However, the project applicant still intends to hire an acoustical engineer to prepare and submit a project noise study prior to receiving building permit(s) to ensure the project complies with County and State building code noise requirements.

Additionally, the NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to permanent noise level increases (EIR, pp. 13-20 to 13-21). The analysis noted that the NFO Plan would result in a permanent change in noise levels by facilitating new

development in North Fair Oaks. The Plan is expected to introduce commercial uses adjacent to, or below, existing or proposed residential uses in mixed-use developments. In addition, new residential development could generate noise that may adversely affect existing or proposed noise-sensitive uses.

Chapter 4.88 of the San Mateo County Code of Ordinances regulates noise, including exterior noise levels at sensitive receptors (single or multiple family residences, schools, hospitals, churches, and public libraries) and interior noise levels within dwelling units. Unnecessary, excessive, or annoying noise levels would be adequately controlled by the County's established development review procedures and subsequent enforcement of the Noise Ordinance.

Therefore, the NFO Plan EIR concluded that impacts related to permanent noise level increases from new development facilitated by the NFO Plan would be represent a less than significant impact.

As discussed above, the project does not include noise sensitive land uses per County General Plan policy. The project would include equipment that may generate noise. Mechanical equipment would be located on the roof of the building and connected to the hotel's guest rooms and common areas. This equipment would be required to comply with the County's Noise Ordinance as a condition of approval included in the project staff report. The exposed portion of the project's parking garage located in the rear portion of the property would contain car lifts (in addition to the noise generally produced by a parking garage) that may produce noise that may disturb occupants of the adjacent residences to the north-northeast. The project proposes a six-foot masonry wall to be constructed along the perimeter of the rear portion of the project site to screen the site from adjacent and nearby residential uses and to dampen noise that may be produced in the rear portion of the project site, as recommended by County staff. The proposed perimeter masonry wall and compliance with the Noise Ordinance would reduce the project's potential permanent noise impacts on project residents and nearby noise-sensitive land uses, including the single-family and multi-family residential uses located north, northeast, and east of the project site, to less than significant levels.

**b) Generation of excessive ground-borne vibration or ground-borne noise levels?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to exposure to temporary construction ground-borne vibration (EIR, pp. 13-16 to 13-18). The analysis noted that demolition and construction activities associated with development activity facilitated by the Plan could generate substantial temporary ground-borne vibration exceeding standard vibration thresholds, which could interfere with normal activities or cause a nuisance for or damage to adjacent properties. Specifically, Plan-facilitated development could involve construction on fill where pile driving may be required to support new building foundations. Other activities during project construction—such as use of building demolition equipment, jackhammers, rock drills, and other high-power or vibratory tools and rolling stock equipment (e.g., tracked vehicles and compactors)—could potentially generate substantial vibration in the immediate project vicinity. Temporary excessive ground-borne vibration would represent a potentially significant impact.

Depending on the proximity of existing structures to the construction area and the methods of construction used, high vibration levels may affect nearby properties. There are two primary concerns with construction-induced vibration—the potential to damage a nearby structure and the potential to interfere with the enjoyment of nearby daily activities. Construction-induced vibration that can be structurally damaging to a building is very rare and has been observed only in instances where the structure is already in a high state of disrepair and when the construction activity occurs immediately adjacent to the structure. Human perception of vibration varies with the individual and is a function of physical setting and the type of vibration.



To mitigate these impacts, the NFO Plan EIR included Mitigation Measure 13-2, which requires conditions in individual project demolition and construction contractor agreements that stipulate certain vibration abatement measures, such as restricted hours during which to perform vibration-generating activity, notification to nearby properties, a pre-construction survey documenting conditions of nearby historic structures, and monitoring of pile-driving vibration levels. The NFO Plan EIR concluded that with implementation of these measures, the NFO Plan's potential intermittent and short-term vibration impacts would be reduced to less than significant.

The project would comply with Mitigation Measure 13-2 and, therefore, would ensure the project would not generate or expose people to excessive construction-related ground-borne vibration or ground-borne noise levels.

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in impacts related to permanent ground-borne vibration impacts (EIR, p. 13-19). The analysis noted that development facilitated by the Plan would not be expected to introduce any permanent new sources of significant ground-borne vibration. However, the Plan would permit new multi-family and single-family residential development within 100 feet of the Caltrain tracks or the Dumbarton rail corridor. Where new residential or other vibration sensitive uses are proposed within 100 feet or less of the Caltrain tracks or the proposed Dumbarton rail corridor, a potentially significant vibration impact could occur.

To mitigate this potentially significant impact, the NFO Plan EIR included Mitigation Measure 13-3, which requires projects within 100 feet of the Caltrain tracks or the proposed Dumbarton rail corridor to complete a detailed site-specific vibration study demonstrating that ground-borne vibrations associated with rail operations either would not exceed applicable FTA ground-borne vibration impact assessment criteria, or would be reduced to below the applicable FTA criteria thresholds through building design and construction measures. The NFO Plan EIR concluded that implementation of this measure would reduce the NFO Plan's potential permanent intermittent vibration impacts to less than significant.

The project is not located within 100 feet of the proposed Dumbarton rail corridor and, therefore, Mitigation Measure 13-3 does not apply to the project. The project would not expose hotel guests to excessive ground-borne vibration or ground-borne noise levels.

**c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?**

The airport land use plan/public airport significance criterion was scoped out of the Plan EIR.

The Plan Area is located approximately three miles southeast of the San Carlos Airport, the nearest airport, well outside the projected 55 dBA CNEL contour published in the San Carlos Airport Land Use Plan (EIR, p. 13-11). As a result, the project site is also located well outside the San Carlos Airport's projected 55 dBA CNEL contour.

The private airstrip significance criterion was not included in the NFO Plan EIR. No private airstrips exist in or near the Plan Area.

The project is not located near a private airstrip.

#### **4.13.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative noise impacts (EIR, pp. 13-21 to 13-23). The

NFO Plan EIR concluded that less than significant cumulative noise level increases are predicted throughout most of the Plan Area, except along Bay Avenue from Woodside Road to Fifth Avenue, and along Middlefield Road from Fifth Avenue to Eighth Avenue. Cumulative impacts related to these two road segments would be significant and unavoidable even after implementation of Mitigation Measure 13-5.

The project site is not located in close proximity to either of these road segments. Mitigation Measure 13-5 does not apply to the project.

#### **4.13.3 Mitigation Measures**

See Mitigation Measures 13-1 and 13-2 in the attached MMRP (Appendix A).

#### **4.13.4 Conclusion**

The conclusions of the NFO Plan EIR relating to noise remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR noise impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant noise impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.14 POPULATION AND HOUSING

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>14. Population and Housing. Would the project:</b>				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	NFO Plan EIR, pp. 14-10 to 14-14.	No	No	NA
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	NFO Plan EIR, p. 14-13.	No	No	NA

### 4.14.1 Discussion

#### Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

The NFO Community Plan is a plan deliberately intended to accommodate growth. The NFO Plan EIR evaluated whether the implementation of the Plan would result in growth inducing impacts (EIR, pp. 14-10 to 14-13). The analysis noted that the NFO Plan would result in planned population growth and would foster economic growth, stimulate private investment, and increase the community's supply of housing, including affordable housing. The Plan EIR concluded that the Plan could provide for the development of up to 3,024 residential units, 180,000 square feet of retail uses, 155,000 square feet of office uses, 210,000 square feet of industrial uses, 110,000 square feet of institutional uses, and 3.8 acres of parks and recreation uses within the Plan Area by 2035. This development would result in an estimated 11,794 new residents and 1,905 new jobs in the Plan Area. The NFO Plan is consistent with the general vision goals, objectives, and policies of the San Mateo County General Plan.

The NFO Plan EIR concluded that the potential environmental impacts of development within North Fair Oaks induced by the Plan had been evaluated at a program level and would be less than significant. However, the location, timing, nature, extent, and severity of the potential environmental impacts of any given project were too speculative to predict or evaluate.

The project is a hotel development that would not provide permanent housing units. On average, the hotel would serve 40 to 50 guests per day. Any increase in population in North Fair

Oaks due to the project would be temporary, as hotel guests would occupy the hotel guestrooms on a short-term, temporary basis. As such, the project would not directly generate population growth. The project would utilize existing infrastructure, including roads and utilities, though improvements, such as new connections and upscaling, to off-site utilities would be needed to serve the project (see Section 4.19, Utilities and Service Systems). The project would not indirectly induce unplanned population growth because the project proposes the use of existing infrastructure. Therefore, the project would not directly or indirectly induce unplanned population growth in the NFO Plan Area. No impact would occur.

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in temporary and permanent employment impacts (EIR, p. 14-13). The analysis noted that development facilitated by the NFO Plan would result in new temporary construction jobs and permanent employment opportunities within the Plan Area. The NFO Plan would generate an estimated 1,905 direct new jobs within the Plan Area by 2035. These new jobs and the resulting activity are considered a beneficial impact.

The project would contribute to job growth in the hospitality sector through the hiring of hotel staff. The project proposal includes an estimated 10 to 15 hotel staff. The project would provide operations, maintenance, landscaping, housekeeping, and administrative jobs necessary to provide services to the hotel's guests and maintain the new building, resulting in new employment opportunities.

**b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts related to the displacement of people or housing (EIR, p. 14-13). The analysis noted that redevelopment of properties within the Plan Area could result in the demolition and loss of housing units and the associated displacement of people, and a need for the construction of replacement housing. The location, timing, nature, extent, and severity of the potential environmental impacts of any given new housing development project within the Plan Area was too speculative to predict or evaluate at the project level in the NFO Plan EIR. Parcel-specific housing projects are subject to their own project level environmental review to evaluate their specific characteristics and changes in the environmental setting over time.

The project would develop a 69-room hotel building on the project site, which is currently occupied by a restaurant, salon, apartment units, and parking lot. The existing two-story building currently occupied by a salon on the ground floor also contains two residential units on the ground floor and two apartment units on the second floor. It is unknown whether these apartment units are currently occupied. Regardless of whether the on-site dwelling units are currently occupied, the project's removal of several on-site apartments would not be considered removal of substantial housing due to the minimal number of units that would be removed, and the housing needs of any potential tenants currently occupying the on-site dwelling units would be absorbed by other existing housing developments in North Fair Oaks and the greater project vicinity. As such, demolition of the existing buildings on site would not necessitate the construction of replacement housing elsewhere. Therefore, while the project would remove several apartment units and could potentially displace existing tenants of those units (if they are occupied), the number of units and people displaced would not be substantial. The project's impact would be less than significant. The project would not create a more severe significant population and housing impact compared to the level of impact described in the NFO Plan EIR.

#### **4.14.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative population and housing impacts (EIR, p. 14-14). The NFO Plan EIR concluded that cumulative impacts related to growth inducement, and displacement of people or housing would be less than significant.

The project is consistent with the NFO Plan EIR.

#### **4.14.3 Mitigation Measures**

No significant population and housing impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.14.4 Conclusion**

The conclusions of the NFO Plan EIR relating to population and housing remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR population and housing impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant population and housing impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.15 PUBLIC SERVICES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>15. Public Services:</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	NFO Plan EIR, pp. 15-21 to 22.	No	No	NA
ii. Police protection?	NFO Plan EIR, pp. 15-17 to 15-18.	No	No	NA
iii. Schools?	NFO Plan EIR, pp. 15-24 to 15-25.	No	No	NA
iv. Parks?	NFO Plan EIR, pp. 15-31 to 15-32.	No	No	NA
v. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?	NFO Plan EIR, pp. 15-7 to 15-8, 15-14 to 15-16, 15-34 to 15-35.	No	No	NA

### 4.15.1 Discussion

**Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

#### i) Fire protection?

The NFO Plan EIR evaluated whether the implementation of the Plan would result in fire and emergency medical services impact (EIR, pp. 15-21 to 15-22). The analysis noted that development pursuant to the NFO Plan would result in an estimated 11,794 new residents and

1,905 new jobs in the NFO Plan Area. This additional development would contribute to an increase in service calls and an incremental need for additional staffing and equipment to maintain fire protection/EMS response time goals and staffing ratios.

The NFO Plan EIR also noted that development under the NFO Plan would be subject to the policies, regulations, and standards of the County, including appropriate standards for emergency access roads, emergency water supply, and fire preparedness, capacity, and response. New developments may also incorporate up-to-date fire protection features and technology (e.g., smoke alarms and interior sprinkling systems). In addition, new development within the Plan Area would be required to incorporate design features identified in the California Building Code, and the Redwood City Fire Department and Menlo Park Fire Protection District (MPFPD) would review and comment on the design of any project that could affect fire or public safety.

The MPFPD has concluded that the projected potential growth in the Plan Area may result in the need for larger fire suppression apparatus (e.g., quint/aerial ladder truck), more than one apparatus (e.g., engine and squad), and more personnel, which would require the District to either expand the Fire Station 5 site or relocate to accommodate the additional equipment and personnel. Additionally, as new development in the Plan Area occurs over time, traffic control devices may need to be modified or eliminated in order for the District to meet acceptable response time standards. The installation of such equipment, as deemed necessary as Plan Area growth occurs over time, could be coordinated with traffic mitigations identified in Chapter 16 (Transportation) of the NFO Plan EIR.

In a process independent of the NFO Plan, the MPFPD is planning to prepare a development impact fee study applicable to structures over three stories in height. This fee has not yet been implemented. The Fire District passed a resolution (Feb 2016) that requested local jurisdictions (including San Mateo County) to enact an impact fee based on the District's nexus study; however, the jurisdictions have refused to implement, so the District passed a resolution to withdraw the request to the local jurisdictions in order to negotiate fees directly with developers (MPFPD 2017). The NFO Plan would also bring additional annual revenue to the County in the form of increased local property taxes and sales taxes that would help offset the increased demand for fire and emergency medical services by funding increases in firefighters, administrative personnel, training, and equipment.

The NFO Plan EIR concluded that the Plan would result in less than significant impacts to fire protection services.

As a hotel building, the project would require services from the MPFPD. The project's initial application materials have undergone preliminary review by MPFPD, and MPFPD's initial comments have been incorporated into the project design (e.g., the requirement for a new fire hydrant on El Camino Real). MPFPD will provide conditions of approval to be included in the project staff report to ensure the project complies with all applicable fire access and safety requirements. The project is consistent with the development assumptions of the NFO Plan EIR. The project site's Commercial Mixed Use (Medium High Density) land use designation and CMU-1 (Commercial Mixed Use-1) Zoning District under the NFO Plan permit hotels with a use permit. The project's proposed FAR of 1.5 meets the CMU-1 District's maximum FAR of 1.5 for commercial uses. Therefore, the project is within the expected density assumed under the NFO Plan EIR.

## ii) **Police protection?**

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in police service impacts (EIR, pp. 15-17 to 15-18). The analysis noted that the anticipated additional

development pursuant to the NFO Plan would result in an associated increase in service calls and a commensurate incremental need for additional staffing and equipment to maintain the County's response time goals. However, the Sheriff's Office has concluded that the effect of the Plan on the Office's ability to patrol, gain access, and respond within the Plan Area would be negligible. The Office noted that development under the NFO Plan may result in the temporary or permanent change of location for the Sheriff's Office Sub-Station at 4th Avenue and Middlefield Road.

The NFO Plan will revitalize and activate the NFO Plan Area, which may help reduce crime by bringing more people into the Area, upgrading municipal services and infrastructure, and incorporating up-to-date security features and technology as newer developments are built. Further, development under the NFO Plan would generate additional annual County revenue in the form of increased local property taxes and sales taxes that would help offset the increased demand for police service by funding increases in police personnel, training, and equipment.

The project is consistent with the development assumptions of the NFO Plan EIR. As discussed in the previous sections, the project's proposed hotel building with 69 guestrooms is permitted in the CMU-1 Zoning District with a use permit.

### iii) **Schools?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on schools (EIR, pp. 15-24 to 15-25). The analysis noted development under the NFO Plan would generate additional students attending the Redwood City School District and the Sequoia Union High School District. Based on the current number of school students living in North Fair Oaks, the RCSD forecasts that the Plan, at buildout, would generate approximately 468 new students to the District. Under current statutes and case law, payment of the required school impact fees would address the impact of the Plan on school services to the furthest extent permitted by law. The Sequoia Union High School District collects school impact fees from residential and non-residential development within the Plan Area, and a portion of the fee is distributed to the Redwood City School District.

The project is a hotel building that would not contain permanent housing units. The project would not generate new students.

### iv) **Parks?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts on parks and recreational facilities (EIR, pp. 15-31 to 15-32). The analysis noted that the estimated 11,794 additional residents with the NFO Plan would generate a need for additional parkland and recreational facilities. Parks and recreational facilities may also be required as part of new development projects. Current and future residents of North Fair Oaks have convenient access to nearby public parks and recreational facilities in neighboring Redwood City. The Redwood City 2010 General Plan EIR concluded that potential physical deterioration of Redwood City parks and recreation facilities (including those utilized by residents of North Fair Oaks, which is in the Redwood City planning Sphere of Influence) would be less than significant through the continued application of the City's parkland dedication/in lieu fee program in combination with implementation of Redwood City New General Plan policies and strategies (e.g., Parks, Recreation, and Community Services Strategic Plan), and ongoing maintenance of improvements to existing facilities undertaken by the City through its park planning and implementation programs. The City of Redwood City coordinated its 2010 General Plan with County staff in order to help ensure that future growth anticipated in North Fair Oaks under the Redwood City 2010 General Plan closely reflects the growth anticipated in the NFO Plan.

The project is consistent with the development assumptions of the NFO Plan EIR. As discussed



in the previous sections, the project's proposed hotel is permitted in the CMU-1 Zoning District with a use permit. Additionally, the project would provide a private patio garden and lounge area for hotel guests and is not expected to generate a direct demand for recreation facilities.

v) **Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?**

See discussion of water, wastewater, and solid waste disposal and recycling impacts in Section 4.19, Utilities and Service Systems.

#### **4.15.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative public services. (EIR, pp. 15-18, 15-22 to 15-23, 15-25 to 15-26.) The NFO Plan EIR concludes that cumulative impacts related to police service would be less than significant; cumulative impacts related to fire protection and emergency medical service would be less than significant; and cumulative impacts related to schools would be less than significant.

The project is consistent with the NFO Plan and would comply with all applicable policies and regulations related to public services.

#### **4.15.3 Mitigation Measures**

No significant public services impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.15.4 Conclusion**

The conclusions of the NFO Plan EIR relating to public services remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR public services impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant public services impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.16 RECREATION

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>16. Recreation. Would the project:</b>				
a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	NFO Plan EIR, pp. 15-31 to 15-32.	No	No	NA
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	NFO Plan EIR, pp. 15-31 to 15-32.	No	No	NA

### 4.16.1 Discussion

#### Would the project:

- a) **Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

See discussion of impacts on parks above in the Public Services section.

The project would provide a private patio garden and lounge area to serve hotel guests. The proposed hotel is not expected to generate a direct demand for new recreation facilities. It is anticipated that hotel guests would utilize existing parks and recreational facilities in the project vicinity during their short-term stays in the proposed hotel building. Hotel guests would not permanently occupy the hotel building, and existing parks and recreational facilities in the vicinity can reasonably accommodate the temporary, short-term increases in parks and facilities usage that may be generated by hotel guests. Hotel staff may also increase the use of nearby parks and recreational facilities; however, the small (i.e., 10-15 people) number of staff proposed by the project are not expected to generate parks and recreational facilities demand that would result in or accelerate substantial physical deterioration of the parks and recreational facilities. Therefore, the project is not expected to cause or accelerate physical deterioration of any nearby recreational facilities.

- b) **Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?**

See discussion of impacts on parks above in the Public Services section.

The project would provide a private patio garden and lounge area to serve the hotel guests. The project is not expected to generate a direct demand for recreation facilities, as discussed above in Section 4.16.1 a). The project would not require the construction or expansion of recreational facilities.

#### **4.16.2 Cumulative Discussion**

The NFO Plan EIR analyzes the Plan's cumulative recreation impacts (EIR, p. 15-32). The NFO Plan EIR concludes parks and recreation development fees, as applicable in neighboring jurisdictions, would be assessed in those communities (e.g., Redwood City). In addition, parks and recreational facilities may also be required as part of new development projects. Therefore, cumulative impacts on parks and recreation would be less than significant.

The project is consistent with the NFO Plan EIR. As described above, the project would not contribute to any cumulatively considerable recreation impacts.

#### **4.16.3 Mitigation Measures**

No significant public services or recreation impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

#### **4.16.4 Conclusion**

The conclusions of the NFO Plan EIR relating to recreation remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR recreation impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant recreation impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.17 TRANSPORTATION

Environmental Issue Area	Where Impact Was Analyzed in the NFO Final EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>17. Transportation/Traffic. Would the project:</b>				
a. Conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?	NFO Plan EIR, pp. 16-27 to 16-45.	No	No  Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	NA
b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Criteria for Analyzing Transportation Impacts?	Criterion was not part of checklist when NFO Plan EIR was prepared.  CEQA Guidelines Section 15064.3, Subdivision (b) Criteria for Analyzing Transportation Impacts came into effect on July 1, 2020.	No	No  Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	NA
d. Result in a change in air traffic patterns, including either an increase in traffic leaves or a change in location that results in significant safety risks?	Scoped out at Notice of Preparation stage.  The Plan Area is not located within an airport land use plan and the Plan would have no impact on air traffic patterns.	No	No	NA

d. Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	NFO Plan EIR, pp. 16-45 to 16-46, 16-57 to 16-58.	No	No	NA
e. Result in inadequate emergency access?	NFO Plan EIR, p. 10-13.	No	No	NA
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	NFO Plan EIR, pp. 16-41 to 16-45.	No	No	NA
g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
h. Result in inadequate parking capacity?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
			Hexagon Transportation Consultants, VMT Analysis and Traffic Impact Study for the Proposed Hotel Located at 2567 El Camino Real in San Mateo County, California, October 12, 2021	

#### 4.17.1 Discussion

##### Would the project:

- a) **Conflict with an applicable plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?**

##### Roadway Facilities

The NFO Plan EIR projected the Plan would result in an additional 30,200 daily vehicle trips, 2,060 morning peak hour trips, and 2,870 evening peak hour vehicle trips. The NFO Plan EIR analyzed the intersection at El Camino Real (SR 82)/Dumbarton Avenue, the closest study intersection, located approximately 1,265 feet southeast of the project site. The El Camino Real/Dumbarton Avenue intersection is under Caltrans jurisdiction. Using the County level of

service (LOS) standard, the NFO Plan EIR concluded that the buildout of the NFO Plan would not result in potentially significant impacts to the El Camino Real/Dumbarton Avenue intersection.

Hexagon Transportation Consultants (Hexagon) prepared a VMT analysis to analyze the project's potential transportation impacts. At 277 daily vehicle trips, 25 morning peak hour trips, and 21 evening peak hour trips (Hexagon 2021, p. 4), the project trip estimates are well within that assumed overall in the NFO Plan EIR.

According to San Mateo County's *Traffic Impact Study Requirements* dated September 1, 2013, projects that would generate over 500 trips per day or over 100 trips during the peak hour would require a traffic impact study. As noted above, the gross project trips generated by the proposed hotel would be 277 daily trips, including 25 AM peak hour trips (10 inbound trips and 15 outbound trips), and 21 PM peak hour trips (12 inbound trips and 9 outbound trips). As a result, the project is not required to prepare a traffic impact study (Hexagon 2021, p. 3), and the project's potential impact on Level of Service (LOS) at El Camino Real (SR 82)/Dumbarton Avenue, or any of the other study intersections included in the NFO Plan EIR, was not evaluated.

At the time the EIR was certified, evaluation of LOS was included in Appendix G of the CEQA Guidelines as the required measure by which project transportation impacts were evaluated. The NFO Plan EIR evaluated ten (10) intersections in the Plan Area to determine whether the NFO Plan would cause any of the study intersections to deteriorate from acceptable to unacceptable LOS, constituting a significant transportation impact. On July 1, 2020, the provisions of CEQA Guidelines Section 15064.3, Subdivision (b) Criteria for Analyzing Transportation Impacts took effect. The updated CEQA Guidelines specify that, with exception to roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact; rather, vehicle miles traveled (VMT) is the appropriate metric for evaluating a project's transportation impacts. Additionally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. As a result of this change to the CEQA Guidelines, adverse changes in LOS no longer constitute a significant environmental impact under CEQA; however, local jurisdictions can still calculate LOS to assess local impacts to traffic congestion *outside of the CEQA process*, and projects can be conditioned to address LOS changes.

As described above, the project's potential impacts on intersections analyzed in the NFO Plan EIR were not evaluated because the project did not meet the screening threshold. Regardless of whether the project would increase traffic at any study intersection included in the NFO Plan EIR, the project would not result in a new significant or substantially more severe significant impact under CEQA than identified in the NFO Plan EIR because adverse changes in LOS no longer constitute a significant environmental impact under CEQA.

See Section 4.17.1 b) for discussion on the project's consistency with Section 15064.3, Subdivision (b) of the CEQA Guidelines. Pursuant to CEQA Guidelines Section 15064.3, the proposed project would not result in a significant impact related to VMT.

Therefore, the project would have less than significant impacts on roadway facilities in the project vicinity.

#### *Pedestrian and Bicycle Facilities*

Pedestrian and bicycle facilities impacts are analyzed in the NFO Plan EIR (EIR, pp. 16-41 to 16-43). Implementation of the NFO Plan would generate pedestrian and bicycle trips, which would use the existing and planned circulation network in the NFO Plan Area. Currently,

sidewalks and pedestrian paths exist along the vast majority of roadways within the Plan Area. Further, the NFO Plan would enhance pedestrian conditions by setting standards for pedestrian-oriented street design features, setting standards for new building frontages, promoting a mix of uses in new developments that would bring trip origins and destinations closer together to encourage walking, and recommending directional and wayfinding signage. The NFO Plan also included recommendations to support implementation of currently planned bicycle improvements and identified several strategies to further enhance the connectivity of the bicycle system within North Fair Oaks. The NFO Plan EIR concluded that the Plan's impact on pedestrian and bicycle facilities will be less than significant.

Sidewalks are located along the north side of El Camino Real and along the west side of Northumberland Avenue in the project vicinity. The project would improve the sidewalks on El Camino Real and Northumberland Avenue. The project's impacts to pedestrian facilities would be less than significant.

There are no existing bike lanes within the NFO Plan Area in the vicinity of the project site according to NFO Plan EIR Figure 16.6 (EIR, p. 16-19). However, there are two proposed bike facilities, a proposed Class II or Class III on-street bike facility on El Camino Real and a proposed Class I Pedestrian/Bike Path within the Hetch-Hetchy Bay Division Pipeline ROW, located in the immediate vicinity of the project site. The project would not impact either of the proposed bike facilities in the vicinity because project activities would be fully contained within the project site. The project would not remove any bicycle facilities, nor would it conflict with any adopted plans or policies for new bicycle facilities.

#### Transit Facilities

Transit facilities impacts are also analyzed in the NFO Plan EIR (EIR, pp. 16-43 to 16-45). The EIR identified potential impacts to transit facilities because the Plan would generate additional transit trips, which would place substantial additional demands on the existing and planned SamTrans, Caltrain and High Speed Rail Authority transit network in the Plan Area. NFO Plan EIR Mitigation Measure 16-7 requires the County to coordinate with SamTrans, Caltrain, the High Speed Rail Authority, and other appropriate transit authorities to ensure that existing and future transit services within the vicinity of NFO Plan are capable of accommodating potential Plan-related increases in transit demand. However, the NFO Plan EIR concluded that the impacts of the Plan on transit service must be deemed significant and unavoidable at the time the EIR was drafted given the anticipated long-term Plan Area buildout period and the uncertainty of the existing and proposed transit facilities, equipment, and services beyond the County's jurisdiction made it impossible to determine whether service improvements would be implemented concurrently with increased demand such that acceptable service levels would be maintained.

SamTrans Route KX runs along El Camino Real immediately south of the project site and provides service to the multi-city express connections to Caltrain stations, San Francisco International Airport, and downtown San Francisco (EIR, pp. 16-12 – 16-13). SamTrans Route 72 runs along Northumberland Avenue and El Camino Real adjacent to the project site and connects Redwood City to the Woodside Plaza Shopping Center (EIR, pp. 16-12 – 16-13). The project site is located in the vicinity of two SamTrans bus stops: one stop located immediately adjacent to the project site on the north side of El Camino Real and one stop within approximately 180 feet walking distance from on the south side of El Camino Real. The project would not remove any transit facilities, nor would it conflict with an adopted plan or policy associated with new transit facilities.

#### Transportation Demand Management (TDM) Measures

The project VMT analysis determined the project is not required to prepare a traffic impact study (Hexagon 2021, p. 3). The project is not required to develop and implement incorporate transportation demand management (TDM) measures to reduce travel demand generated by the project.

### Parking

Parking capacity impacts were not included in Plan EIR.

The project would be required to provide 48 total parking spaces, which is the amount of parking required for areas in North Fair Oaks which are zoned Commercial Mixed Use-1 (CMU-1), according to County Zoning Regulations (Hexagon 2021, p. 3). Therefore, the project's proposal to provide 48 parking spaces for guests and staff would be sufficient to accommodate the project's parking demand and satisfy County Code parking requirements (Hexagon 2021, p. 3).

### **b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) Criteria for Analyzing Transportation Impacts?**

This significance criterion was not included in the NFO Plan EIR, as CEQA Guidelines Section 15064.3, Subdivision (b), Criteria for Analyzing Transportation Impacts, took effect on July 1, 2020. Section 15064.3, Subdivision (c) determined that vehicle miles traveled (VMT) is the appropriate measure for evaluating a project's transportation impacts, which were previously evaluated using vehicle Level of Service (LOS) standards. VMT refers to the amount and distance of automobile travel attributable to a project. While VMT is not a new measure, as it has been used previously in CEQA analysis to characterize a project's GHG emissions or energy impacts, it is now required for consideration of a project's potential transportation-related impacts.

On September 23, 2020, San Mateo County adopted VMT interim guidelines to be used with new development projects (Hexagon 2021, p. 1). The County's VMT interim guidelines are intended to satisfy the California Environmental Quality Act (CEQA) VMT impact analysis requirements. The County's VMT interim guidelines provide VMT thresholds, baselines, and criteria to evaluate VMT impacts for new development projects. The guidelines also provide screening criteria for new developments. The San Mateo County VMT interim guidelines state that significance criteria guidance has not been published for hotel projects. Therefore, the County will review on a case-by-case basis.

San Mateo County's VMT interim guidelines provide screening criteria that exempt developments from further CEQA transportation impact analysis. Per these guidelines, projects that meet all the listed screening criteria and are located in a Transit Priority Area are assumed to have a less than significant VMT impact:

- ½ mile from high quality transit stop/rail station, where high quality transit is a fixed route bus service with service intervals no longer than 15 minutes during peak commute hours;
- Floor area ratio > 0.75;
- Does not replace affordable residential units with a smaller number of moderate/high income housing units;
- Does not provide more parking than required; and
- Consistent with Sustainable Communities Strategy.



According to the project's VMT analysis, the proposed project would meet all the screening criteria set forth in the San Mateo County VMT interim guidelines (Hexagon 2021, p. 3). Therefore, the project would not require a detailed CEQA transportation analysis. Project VMT impacts would be less than significant.

**c) Result in a change in air traffic patterns, including either an increase in traffic leaves or a change in location that results in significant safety risks?**

This significance criterion was scoped out of the NFO Plan EIR at the Notice of Preparation stage.

The Plan Area is not located within an airport land use plan, and the Plan would have no impact on air traffic patterns.

**d) Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The project would not increase hazards to a geometric design feature. The project would replace and improve existing sidewalks along El Camino Real and Northumberland Avenue. The project proposes a new driveway along Northumberland Avenue, which would be required to meet County standards for driveways, including design and adequate sight distances. The project is a commercial use that is compatible with the existing commercial uses in the project vicinity, including a number of hotels and motels located on El Camino Real to the northwest and southeast.

**e) Result in inadequate emergency access?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in emergency response impacts (EIR, p. 10-13). The San Mateo County Sheriff's Office, Office of Emergency Services provides disaster planning for all types of natural and technological disasters. The EIR analysis noted that following established County practice, a traffic control plan would be developed and implemented by the County for each individual project affecting a major travel route in order to maintain access to properties within the project limits and emergency access to and through the area, and to minimize traffic disruption and congestion, and traffic safety hazards. Any need for traffic lane reductions or street closure due to construction would be short-term, temporary, and localized, and adequately managed through standard County traffic management practices implemented in the traffic control plan. The NFO Plan EIR concluded that the Plan would not interfere with emergency response or evacuation or interfere with locally adopted emergency response or evacuation plans. Therefore, the potential impact of the Plan on emergency response would be less than significant.

The project site currently has one driveway providing interior site access from Northumberland Avenue and access along the building frontage from El Camino Real and Northumberland Avenue. The project would remove the existing driveway and establish a new parking garage driveway farther south along the western property line. The new driveway would provide emergency and fire vehicle access to the interior of the new building. Emergency access would continue to be maintained along El Camino Real and Northumberland Avenue. El Camino Real and Northumberland Avenue would serve as aerial fire apparatus access roads, allowing emergency and fire vehicles to access the southern and eastern sides of the new building.

The project would create a traffic control plan as required by standard County practice. Further, the project's site plan has been preliminarily reviewed by the Menlo Park Fire Protection District (MPFPD), which provided comments on site design, including the need for a new fire hydrant to

serve the project, and required coordination items to be included in the project permit drawings. MPFPD would also provide conditions of approval to ensure adequate emergency access to be incorporated into the staff report for the project.

**f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

See Section 4.17.1 a) for a discussion of the project's consistency with adopted policies, plans, or programs regarding public transit, bicycle, and pedestrian facilities.

**g) Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?**

This significance criterion was not included in the NFO Plan EIR.

See Section 4.17.1 a) for a discussion of the project's impacts on pedestrian traffic and facilities.

**h) Result in inadequate parking capacity?**

This significance criterion was not included in the NFO Plan EIR.

See Section 4.17.1 a) for a discussion of the project's impacts related to parking capacity.

## **4.17.2 Cumulative Discussion**

The NFO Plan EIR concluded that the buildout of the NFO Plan would result in potentially significant impacts to several study intersections at a cumulative level (NFO Plan EIR, pp. 16-54 – 16-57). The NFO Plan EIR included Mitigation Measures 16-9 through 16-14 to reduce the potential significance of the Plan's impacts on the study intersections that would experience potential significant impacts at the cumulative level. Mitigation Measures 16-10, 16-11, and 16-12 would reduce potentially significant impacts on the respective intersections to less than significant. Mitigation Measures 16-9, 16-13, and 16-14 would lessen the impacts to the respective intersections in the cumulative scenario, but impacts would remain significant and unavoidable. The project VMT Analysis determined the project does not require the preparation of a Transportation Impact Analysis per San Mateo County's *Traffic Impact Study Requirements* and, as such, the project would not have significant impacts on any intersection, including the study intersections included in the NFO Plan EIR. Further, any potential project impacts on the NFO Plan EIR study intersections would not constitute a new significant or substantially more severe significant impact under CEQA than identified in the NFO Plan EIR because LOS is no longer used to determine the significance of transportation impacts under CEQA. Mitigation Measures 16-9 through 16-14 are not applicable to the project.

The NFO Plan EIR also concluded that safety issues related to at-grade rail crossings would be a potentially significant cumulative impact and would remain significant and unavoidable even with implementation of Mitigation Measure 16-8 (EIR, p. 16-57).

As described above, the project is not located in the vicinity of an at-grade rail crossing and would have a less than significant impact to at-grade railroad crossings. The project would not have a cumulatively considerable impact related to at-grade railroad crossings.

## **4.17.3 Mitigation Measures**

Mitigation Measures 16-1 through 16-15 are not applicable to the project. No mitigation

measures are required.

#### **4.17.4 Conclusion**

The conclusions of the NFO Plan EIR relating to transportation and traffic remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR transportation and traffic impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant transportation and traffic impact resulting from the project. VMT was incorporated into the CEQA Guidelines as an Appendix G Checklist issue area following the certification of the NFO Plan EIR, but VMT is not a new CEQA issue, and it has been used previously to characterize a project's GHG emissions or energy impacts under CEQA. Also, the proposed project meets all the screening criteria of the County's VMT interim guidelines. Therefore, no additional analysis under CEQA is required for the project.

## 4.18 TRIBAL CULTURAL RESOURCES

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>18. Tribal Cultural Resources. Would the project:</b>				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Criterion was not part of checklist when NFO Plan EIR was prepared.  Tribal Cultural Resources was not an Appendix G environmental issue area when NFO Plan EIR was certified.	No	No	Yes

### 4.18.1 Discussion

**Would the project:**

- a) **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical**

- Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or**
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

The NFO Plan EIR did not include this environmental issue because the category of "Tribal Cultural Resources" was added to Appendix G of the CEQA Guidelines after the NFO Plan EIR was published. See Section 4.5, Cultural Resources, which discusses the NFO Plan EIR's analysis regarding impacts to cultural resources, including archeological resources. The Plan EIR's analysis regarding potential cultural resources impacts also applies to potential impacts to tribal cultural resources.

The analysis noted that the NFO Plan Area contains three (3) recorded archaeological resources, P-41-000086, P-41-000299, and P-41-000303, all of which are prehistoric Native American habitation sites. There is a moderate to high potential for the presence of additional unrecorded Native American resources within the NFO Plan Area. There are no previously recorded historic-period archaeological resources within the NFO Plan Area. Based on review of historical literature and maps, there is a moderate to high potential for the presence of unrecorded historic-period archaeological resources within the NFO Plan Area.

Development in accordance with the NFO Plan could disrupt, alter, or eliminate as-yet undiscovered prehistoric or historic-period archaeological sites, potentially including Native American remains. This possibility represents a potentially significant impact. The NFO Plan EIR included Mitigation Measure 8-1, which requires identification of the three (3) recorded Native American habitation sites within the Plan Area, measures protecting these sites, and measures applicable in the inadvertent discovery of archaeological resources. See Mitigation Measure 8-1 in the attached MMRP (Appendix A). The NFO Plan EIR concluded that implementation of this measure would reduce the Plan's impacts to archaeological resources to less than significant.

The project site does not appear to be located within one of the three (3) recorded Native American habitation sites. For cultural preservation reasons, the locations of any such sites are not revealed in public documents. In the event of inadvertent discovery of archaeological resources, including tribal cultural resources, the project would comply with Mitigation Measure 8-1. Implementation of Mitigation Measure 8-1 would reduce the project's impacts to tribal cultural resources to less than significant.

#### **4.18.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative cultural resources impacts (EIR, p. 8-18). The NFO Plan EIR concluded that implementation of Mitigation Measure 8-1 would reduce the impacts of the Plan and, therefore, reduce the Plan's contribution to significant cumulative impacts on archaeological resources to less than significant. While the NFO Plan EIR did not directly address the Plan's cumulative tribal cultural resources impacts, Mitigation Measure 8-1 would also reduce the Plan's contribution to significant cumulative impacts to tribal cultural resources to less than significant. The project would be subject to and comply with Mitigation Measure 8-1.

#### **4.18.3 Mitigation Measures**

See Mitigation Measure 8-1 in the attached MMRP (Appendix A).

#### **4.18.4 Conclusion**

The conclusions of the NFO Plan EIR relating to cultural resources remain valid. None of the three recorded Native American habitation sites identified in the NFO Plan EIR appears to be located on the project site. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR cultural resources impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant cultural resources impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issue Area	Where Impact Was Analyzed in the NFO Plan EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>19. Utilities and Service Systems. Would the project:</b>				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	NFO Plan EIR, pp. 11-11, 15-7 to 15-9, 15-14 to 15-16.	No	No  Luk Associates, Attachment Q (Water Demand Projection Worksheet), 2022  Luk Associates, Attachment L (Sewage Generation Projection Worksheet), 2022	NA
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	NFO Plan EIR, pp. 15-7 to 15-9.	No	No  Luk Associates, Attachment Q (Water Demand Projection Worksheet), 2022	NA
c. Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	NFO Plan EIR, pp. 15-14 to 15-16.	No	No  Luk Associates, Attachment L (Sewage Generation Projection Worksheet), 2022	NA
d. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	NFO Plan EIR, pp. 15-34 to 15-35.	No	No	NA
e. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	NFO Plan EIR, pp. 15-34 to 15-35.	No	No	NA

f. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?	Criterion not included in the NFO Plan EIR.  Future development in accordance with the Plan would need to comply with and participate in applicable demolition/construction and household/commercial solid waste recycling regulations and programs. As such, the NFO Plan EIR did not evaluate this issue.	No	No	NA
g. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
h. Generate any demands that will cause a public facility or utility to reach or exceed its capacity?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA

#### 4.19.1 Discussion

##### Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

##### Water

The NFO Plan EIR evaluated whether the implementation of the Plan would result in water distribution, fire flow, and emergency storage impacts (EIR, pp. 15-7 to 15-8). The analysis noted that because water systems are sized primarily to meet fire flow capacity, some replacement of local water lines may be required to serve future, larger developments in the Plan Area. Also, local improvements may be needed if higher density development occurs in a location currently served by undersized lines.

Under existing County development permitting procedures, each individual future development



project within the Plan Area would be required to: (1) pay applicable County development and connection fees, (2) pay its fair share toward necessary water system facilities to support the proposed development's water infrastructure needs, and (3) submit final project water system design specifications and construction modifications for approval by the Public Works Department. In addition, new service connections and/or the effects of higher density development may require localized pipe replacement. Temporary construction-period traffic, noise, air quality, water quality and other potential impacts would be mitigated through the County's standard construction mitigation practices. Therefore, the NFO Plan EIR concluded that the environmental impact of the NFO Plan related to water distribution facilities and fire flow would be less than significant.

The project would comply with the County development permitting procedures that require payment of applicable County development and connection fees, payment of the project's fair share toward necessary water system facilities, and submission of final water system design specifications and construction modifications for approval by the Public Works Department. Any construction required to accommodate the project's water supply would comply with the County's standard construction practices.

### Wastewater

The NFO Plan EIR also evaluated whether the implementation of the Plan would result in wastewater collection impacts. (EIR, pp. 15-14 to 15-15.) The analysis notes that additional development pursuant to the NFO Plan would generate an increase in wastewater requiring collection and treatment. Net new development under the NFO Plan would result in an estimated additional wastewater generation in the NFO Plan Area of approximately 2,399 Residential Unit Equivalents (RUE). The 2,399 RUEs equate to approximately 527,780 gpd (gallons per day), or 95 percent of total water demand; this is consistent with standard, professionally recognized ratios of wastewater generation to water demand (e.g., nearby City of Redwood City calculation formulas).

Table 15.2  
PROJECTED WASTEWATER GENERATION DEMAND (RUE)<sup>1</sup>

<u>Opportunity Area</u>	<u>Net Increase with Community Plan Update Buildout</u>
El Camino Real/5th Avenue Area	460
Middlefield Road/Transit Area	1,252
Edison Way Industrial Area	106
Northern Industrial Area	581
<b>TOTAL:</b>	<b>2,399</b>

SOURCE: Wagstaff/MIG, BKF. Draft North Fair Oaks Community Plan--Infrastructure, May 2011.

<sup>1</sup> RUE = Residential Unit Equivalent. One RUE = approximately 220 gallons per day; 2,399 RUEs = 527,780 gpd. See footnote in subsection 15.2.1.

Wastewater collection service within the NFO Plan Area is provided by the Fair Oaks Sewer Maintenance District (FOSMD) and the West Bay Sanitary District (WBSD), wastewater conveyance to the treatment plant is provided by City of Redwood City, and wastewater treatment is provided by Silicon Valley Clean Water (SCVW; formerly South Bayside System Authority (SBSA)). The NFO Plan EIR analysis notes that net new development allowed under the Plan could generate a total of approximately 0.507 million gallons per day (mgd) average dry weather flow (ADWF) of wastewater, or a net increase of approximately 0.528 mgd ADWF.

The NFO Plan EIR stated Redwood City (the permittee) is allocated 13.8 mgd of ADWF capacity at the SVCW wastewater treatment facility and uses up to approximately 9 mgd of its capacity. As of 2016, Redwood City is allocated maximum capacity rights of 11.4 mgd ADWF with an additional 2.685 mgd available for purchase (SVCW 2019). The Plan EIR concluded available treatment capacity is adequate to meet the estimated net increase of 527,780 gpd (0.528 mgd) ADWF with the NFO Plan. Redwood City has been allocated 30.5 mgd of peak wet weather flow (PWWF) treatment capacity at the SVCW treatment facility. According to the Plan, Redwood City has on occasion exceeded its PWWF allocation and according to the Plan EIR, Redwood City's highest PWWF rate was 29.22 mgd in January 2008, which approached but did not exceed its allocated capacity. The NFO Plan EIR concluded that the impact of new development allowed under the Plan on wastewater treatment capacity would be less than significant.

Sewer lines serving the Plan Area would be upgraded by individual development project applicants to ensure adequate capacity for residential, commercial, and industrial demand. Under existing County development permitting procedures, each individual future development project within the NFO Plan Area would be required to: (1) pay applicable County development and connection fees, (2) pay its fair share toward necessary sewer system facilities to support the proposed development's sewer infrastructure needs, and (3) submit final project water system design specifications and construction modifications for approval by the Public Works Department. Temporary construction-period traffic, noise, air quality, water quality and other potential impacts would be mitigated through the County's standard construction mitigation practices.

Therefore, the NFO Plan EIR concluded that the environmental impact of the NFO Plan related to wastewater treatment facilities and fire flow would be less than significant.

The project is within the El Camino Real/5<sup>th</sup> Avenue Opportunity Area and is consistent with development assumptions of the NFO Plan EIR. The project site currently generates wastewater as the site is occupied by a restaurant, salon, and apartment units, and contains plumbed wastewater utilities. (See Section 4.19.1 b). The project would generate approximately 12,782 gpd of wastewater (Luk Associates 2022a). As a result, project-generated wastewater would not exceed the estimated 101,200 gpd of wastewater that is anticipated to be produced in the overall El Camino Real/5<sup>th</sup> Avenue Opportunity Area or the projected total net increase in wastewater generation from Plan buildout (527,780 gpd). The Fair Oaks Sewer District has indicated it would continue to serve the project site following project implementation because there is sufficient sewer capacity to serve the proposed project. The Fair Oaks Sewer District noted the project applicant will be required to replace approximately 400-1,000 linear feet of pipes within the Sewer District.

In accordance with County policy to mitigate any new net sewer flow increase into the existing system, the project would construct sewer improvements based on the net sewer flow estimated for the project and using the County's preferred calculation methodology. Further, the project would comply with the County development permitting procedures and pay applicable County development and connection fees, pay its fair share toward necessary sewer system facilities, and submit final project water system design specifications and construction modifications for approval by the Public Works Department. Any construction required to accommodate the project's wastewater treatment would comply with the County's standard construction practices.

*Stormwater Drainage*

See discussion under Section 4.10, Hydrology and Water Quality. The NFO Plan EIR evaluated whether the implementation of the Plan would result in stormwater drainage systems impacts and concludes the impacts of the Plan on storm drainage would represent a less than significant impact. The project would be required to implement LID measures to store and treat stormwater, and other measures that would result in no increase in stormwater runoff from the project site during a 10-year storm event. The project would comply with County development permitting procedures, pay applicable County development and connection fees, pay its fair share toward necessary stormwater drainage facilities, and submit final project stormwater system design specifications and construction modifications for approval by the Public Works Department. Any construction required to accommodate the project's stormwater collection and treatment would comply with the County's standard construction practices.

*Electric Power, Natural Gas, and Telecommunications*

While the NFO Plan EIR did not specifically address the NFO Plan's impacts on electric power, natural gas, or telecommunications facilities, under existing County development permitting procedures each individual future development project within the NFO Plan Area would be required to: (1) pay applicable County development and connection fees, (2) pay its fair share toward necessary facilities to support the proposed development's infrastructure needs, and (3) submit final project electrical power, natural gas, and telecommunications systems design specifications and construction modifications for approval by the Public Works Department. Temporary construction-period traffic, noise, air quality, water quality and other potential impacts would be mitigated through the County's standard construction practices.

The project would require off-site utilities improvements to install electricity and natural gas connections, water supply connections for domestic, irrigation, and fire water uses, and sanitary sewer connections. Off-site sanitary sewer and water utilities would require upscaling. The project would comply with the County development permitting procedures. Any construction required to accommodate the project's electrical power, natural gas, or telecommunications systems would comply with the County's standard construction practices. Project impacts on electrical power, natural gas, and telecommunications facilities would be less than significant.

**b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in water supply impacts (EIR, pp. 15-7 to 15-8). The analysis notes that additional development pursuant to the NFO Plan would generate a projected net increase in water demand of approximately 555,560 gpd.

Table 15.1  
PROJECTED WATER DEMAND (GPD)<sup>1</sup>

Opportunity Area	Net Increase with Community Plan Update Buildout
El Camino Real/5th Avenue Area	106,490
Middlefield Road/Transit Area	289,950
Edison Way Industrial Area	24,500
Northern Industrial Area	134,620
<b>TOTAL:</b>	<b>555,560</b>

SOURCE: Wagstaff/MIG, BKF. Draft North Fair Oaks Community Plan--Infrastructure, May 2011.

<sup>1</sup> gpd = gallons per day

California Water Service (Cal Water) and the City of Redwood City will supply water to the NFO Plan Area, and future growth in North Fair Oaks is expected by both water suppliers in their respective Urban Water Management Plans. As required by state law, any individual development proposal that meets Senate Bill (SB) 610 criteria (i.e., water demand equivalent to 500 dwelling units) must have prepared a Water Supply Assessment to evaluate water supply availability. In addition, each individual project developer would be responsible for funding the design and construction of necessary water infrastructure upgrades. Based on these requirements and conclusions, the Plan EIR concluded the water supply impact of the NFO Plan would be less than significant.

The project is within the El Camino Real/5<sup>th</sup> Avenue Opportunity Area and is consistent with development assumptions of the NFO Plan EIR. The project would receive water service from Cal Water, one of the two water service providers in the Plan Area. The project applicant estimates the project would result in a domestic water demand (i.e., indoor water demand plus landscaping) of approximately 13,514 gpd (Luk Associates 2022b). As a result, project-generated water demand would not exceed the 106,490 gpd estimated net increase in water demand projected for the El Camino Real/5<sup>th</sup> Avenue Opportunity Area under Plan buildout, or the projected total net increase in water demand from Plan buildout, 555,560 gpd. Cal Water has indicated its ability to continue to serve the project site following project implementation (North Fair Oaks Community Council 2022). Cal Water noted upgrades to the water mains on Northumberland Avenue and El Camino Real may be required.

- c) **Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

See discussion under Section 4.19.1 a) regarding wastewater collection and treatment impacts.

- d) **Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts to solid waste and recycling services (EIR, pp. 15-34 to 15-35). Demolition and construction activities, and the operation of new development facilitated by the Plan, would generate additional solid waste. The South Bayside Waste Management Authority Service does not anticipate any impact on Recology's ability to handle the waste hauling needs under the proposed Plan. Property owners would be required to comply with all provisions of the San Mateo County Ordinance Code, Title 4, Sanitation and Health, Chapter 4.04--Solid Waste

Collection, Transport and Disposal; and Chapter 4.1 05--Recycling and Diversion of Debris from Construction and Demolition, Section 4.105.01 O(a); as well as the San Mateo County Green Building Program (Sections 1401-1408 of the County Code). Future development under the Plan would not be expected to generate an inordinate amount of solid waste--i.e., a rate inconsistent with adopted policies and regulations--either during demolition/construction or operation/occupancy--and would be served by a landfill with sufficient capacity to accommodate Plan demolition/construction debris and annual solid waste disposal needs. The NFO Plan EIR concluded that the impact of development allowed under the Plan on solid waste and recycling services would represent a less than significant impact.

The project would comply with County requirements regarding solid waste disposal and recycling.

**e) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

The NFO Plan EIR evaluated whether the implementation of the Plan would result in impacts to solid waste and recycling services (EIR, pp. 15-34 to 15-35). Demolition and construction activities, and the operation of new development facilitated by the Plan, would generate additional solid waste. The South Bayside Waste Management Authority Service did not anticipate any impact on Recology's ability to handle the waste hauling needs under the proposed Plan. Property owners would be required to comply with all provisions of the San Mateo County Ordinance Code, including Title 4, Sanitation and Health, Chapter 4.04--Solid Waste Collection, Transport, Storage, and Disposal; Chapter 4.105--Recycling and Diversion of Debris from Construction and Demolition; and San Mateo County Green Building Program (Sections 1401-1408 of the County Code). Future development under the Plan would not be expected to generate an inordinate amount of solid waste--i.e., a rate inconsistent with adopted policies and regulations--either during demolition/construction or operation/occupancy--and would be served by a landfill with sufficient capacity to accommodate Plan demolition/construction debris and annual solid waste disposal needs. The NFO Plan EIR concluded that the impact of development allowed under the Plan on solid waste and recycling services would represent a less than significant impact.

According to CalRecycle's Service Section Solid Waste Generation Rates for hotels, a hotel produces approximately two pounds (lbs) of solid waste per hotel room per day (CalRecycle 2023). Considering the project would develop 69 hotel rooms, the project would generate approximately 138 lbs of solid waste per day, and approximately 50,370 lbs of solid waste per year. The project would comply with County requirements regarding solid waste disposal and recycling.

**f) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

This significance criterion was scoped out of the Plan EIR.

The project would comply with all applicable federal, State, and local statutes and regulations related to solid waste.

**g) Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?**

This significance criterion was not included in the NFO Plan EIR.

See discussion under Section 4.6.1 a) regarding project energy consumption, Section 4.10.1 c) regarding water conservation measures, and Section 4.19.1 f) regarding solid waste reduction.

**h) Generate any demands that will cause a public facility or utility to reach or exceed its capacity?**

This significance criterion was not included in the NFO Plan EIR.

See discussion under Section 4.19.1 a) regarding impacts to water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities.

See discussion under Section 4.19.1 d) and Section 4.19.1 e) regarding impacts to solid waste disposal facilities.

### **4.19.2 Cumulative Discussion**

The NFO Plan EIR analyzed the Plan's cumulative utilities and service systems impacts (EIR, pp. 11-15, 15-9, 15-16, and 15-35). The EIR concluded that cumulative impacts related to stormwater drainage would be less than significant; cumulative impacts related to water service would be less than significant; cumulative impacts related to wastewater service would be less than significant; and cumulative impacts related to solid waste and recycling services would be less than significant. Though the NFO Plan EIR did not specifically address cumulative impacts related to electrical power, natural gas, and telecommunications facilities, cumulative impacts related to these facilities would be less than significant.

The project would be consistent with the Plan EIR's analysis of potential cumulative utilities and service systems impacts under the proposed buildout, as the addition of proposed project's hotel use would not cause development in the Plan Area to approach nor exceed the proposed buildout under the Plan.

### **4.19.3 Mitigation Measures**

No significant utilities and service systems impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

### **4.19.4 Conclusion**

The conclusions of the NFO Plan EIR relating to utilities and service systems remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR utilities and service systems impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant utilities and service systems impact resulting from the project. Therefore, no additional analysis under CEQA is required for the project.

## 4.20 WILDFIRE

Environmental Issue Area	Where Impact Was Analyzed in the NFO Final EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>20. Wildfire.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Criterion was not part of checklist when NFO Plan EIR was prepared.	No	No	NA

### 4.20.1 Discussion

**If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**

- a) **Substantially impair an adopted emergency response plan or emergency evacuation plan?**

- b) **Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**
- c) **Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**
- d) **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

See Section 4.9.1 g) under Hazards and Hazardous Materials. This environmental issue area and accompanying significance criteria were not included in Appendix G Checklist when the NFO Plan EIR was certified. Evaluation of wildland fire hazard was scoped out of the Plan EIR during the Notice of Preparation phase because the Plan Area is not subject to wildland fire hazard. The Plan Area is highly urbanized and contains no wildland areas.

The Plan EIR concludes there would be no impact related to wildfire hazards. The nearest state responsibility area and lands classified as very high fire hazard severity zones (VHFHSZ) are located approximately 3.67 miles southwest of the project site (CAL FIRE 2022). The project would not have impacts related to wildfire hazards.

#### **4.20.2 Cumulative Discussion**

The NFO Plan EIR did not analyze the Plan's wildfire hazard impacts. The Plan EIR concludes there would be no impact related wildfire because evaluation of wildland fire hazard was scoped out of the Plan EIR. There would also be no cumulative impact related to wildfire.

#### **4.20.3 Mitigation Measures**

No significant wildfire impacts were identified in the NFO Plan EIR, and no mitigation measures were required.

The project would not result in wildfire impacts.

#### **4.20.4 Conclusion**

The conclusions of the NFO Plan EIR relating to wildfire remain valid. The project is consistent with the NFO Plan EIR. There is no evidence of substantial changes to the circumstances under which the NFO Plan EIR wildfire impacts were analyzed. There is also no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the NFO Plan EIR was certified, that would show a new or more severe significant wildfire impact resulting from the project.

Therefore, no additional analysis under CEQA is required for the project.



## 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue Area	Where Impact Was Analyzed in the NFO EIR.	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Do Prior Environmental Documents' Mitigations Address/Resolve Impacts?
<b>21. Mandatory Findings of Significance.</b>				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	NFO Plan EIR, Sections 4-4, Biological Resources, and 4-5, Cultural Resources.	No	Yes, discussed throughout environmental checklist.	Yes
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	NFO Plan EIR, Sections 4-1 through 4-7.	No	Yes, discussed throughout environmental checklist.	Yes
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	NFO Sections 4.3, Air Quality, 4.8, Hazards and Hazardous Materials, and 4-12, Noise.	No	Yes, discussed throughout environmental checklist.	Yes

### 4.21.1 Conclusion

Following the certification of the NFO Plan EIR, there have been regulatory changes. However, pursuant to the discussions throughout this environmental checklist, no new significant impacts or substantially more severe significant impacts have been identified.

All adopted, applicable mitigation in the NFO Plan EIR would be implemented in the project. Further, the project would be conditioned to require implementation of the applicable mitigation measures discussed in this environmental checklist. Therefore, no new significant impacts would occur with implementation of the project.

**RESPONSIBLE AGENCIES**

AGENCY	YES	NO	TYPE OF APPROVAL
U.S. Army Corps of Engineers (USACE)		X	
State Water Resources Control Board (State Water Board)		X	
Regional Water Quality Control Board	X		Stormwater Control Plan; Stormwater Facility Operation and Maintenance Plan
State Department of Public Health		X	
San Francisco Bay Conservation and Development Commission (BCDC)		X	
U.S. Environmental Protection Agency (EPA)		X	
County Airport Land Use Commission (ALUC)		X	
California Department of Transportation (CalTrans)	X		
Bay Area Air Quality Management District		X	
U.S. Fish and Wildlife Service		X	
Coastal Commission		X	
County	X		Use Permit; Building Permit(s); Grading Permit; Design Review Approval; County Encroachment Permit for El Camino Real and Northumberland Avenue
Fair Oaks Sewer Maintenance District (Sewer District)	X		All appropriate permits for installation of additional sewer connections
CalWater (Water District)	X		Legal easement for improvements to water system

MITIGATION MEASURES	YES	NO
The mitigation measures in the Environmental Impact Report certified for the North Fair Oaks Community Plan (NFO Plan) have been proposed in project application.	X	
Other mitigation measures are needed.		X
<p>The following mitigation measures from the North Fair Oaks Plan are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines (see Appendix A: Mitigation Monitoring and Report Program for full mitigation measures)</p> <ul style="list-style-type: none"> <li>• Mitigation Measure 5-1</li> <li>• Mitigation Measure 8-1</li> <li>• Mitigation Measure 8-2</li> <li>• Mitigation Measure 8-3</li> <li>• Mitigation Measure 8-4</li> <li>• Mitigation Measure 13-1</li> <li>• Mitigation Measure 13-2</li> </ul>		

**DETERMINATION** (to be completed by the lead agency). On the basis of this initial evaluation:

Pursuant to Section 15168(c) (*Program EIR*) of CEQA Guidelines, County Planning Staff has concluded that the project is within the scope of the project covered by the Program Environmental Impact Report (Program EIR) certified for the North Fair Oaks Community Plan in 2011, and that the project as proposed would have no new effects and would require no new mitigation measures. Further, in addition to the conditions of approval that would be included in the project staff report, the project is required to implement all applicable mitigation measures adopted in the Program EIR. Therefore, no additional environmental document is required.

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Signature

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Date

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Title

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## APPENDIX A: MITIGATION MONITORING AND REPORTING PROGRAM

Note: S = Significant / LS = Less than Significant / SU = Significant Unavoidable Impact / NA = Not Applicable

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b>AIR QUALITY</b>					
<b>Impact 5-1: Short-Term Construction Emissions.</b> Demolition or construction activities facilitated by the updated Plan may generate temporary emissions of ROG, NOx and PM10 that exceed BAAQMD thresholds of significance. In addition, related construction dust could cause localized health and nuisance impacts on adjacent residential sensitive receptors. These possible effects represent a	S	<b>Mitigation 5-1.</b> Grading, demolition, or construction activity for future discretionary development projects within the Plan Area shall be conditioned to implement the following or similar best management practices:  (a) The following dust control measures by construction contractors, where applicable:  During <i>demolition</i> of existing structures: <ul style="list-style-type: none"> <li>• Water active demolition areas to control dust generation during demolition of structures and break-up of pavement.</li> <li>• Cover all trucks hauling demolition debris from the site.</li> <li>• Use dust-proof chutes to load debris into trucks whenever feasible.</li> </ul>	County	LS	Applicable to all grading, demolition, or construction activity.



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b><i>potentially significant impact.</i></b>		<p>During all <i>construction phases</i>:</p> <ul style="list-style-type: none"> <li>• Water all active construction areas at least twice daily.</li> <li>• Water or cover stockpiles of debris, soil, sand, or other materials that can be blown by the wind.</li> <li>• Cover all trucks hauling soil, sand, and other loose materials, or require all trucks to maintain at least two feet of freeboard.</li> <li>• Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.</li> <li>• Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites.</li> <li>• Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.</li> <li>• Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>graded areas inactive for ten days or more).</p> <ul style="list-style-type: none"> <li>• Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.).</li> <li>• Limit traffic speeds on unpaved roads to 15 miles per hour.</li> <li>• Install sandbags or other erosion control measures to prevent silt runoff to public roadways.</li> <li>• Replant vegetation in disturbed areas as quickly as possible.</li> <li>• Consult with the BAAQMD prior to demolition of structures suspected to contain asbestos to ensure that demolition/construction work is conducted in accordance with BAAQMD rules and regulations.</li> </ul> <p>(b) The following best management controls on emissions by diesel-powered construction equipment used by construction contractors, where applicable:</p> <ul style="list-style-type: none"> <li>• When total construction projects at any one time would involve</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>greater than 270,000 square feet of development or demolition, a mitigation program to ensure that only equipment that would have reduced NOx and particulate matter exhaust emissions shall be implemented. This program shall meet BAAQMD performance standards for NO standards--e.g., should demonstrate that diesel-powered construction equipment would achieve fleet-average 20 percent NOx reductions and 45 percent particulate matter reductions compared to the year 2010 ARB statewide fleet average.</p> <ul style="list-style-type: none"> <li>• Ensure that visible emissions from all on-site diesel-powered construction equipment do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired or replaced immediately.</li> <li>• The contractor shall install temporary electrical service whenever possible to avoid the</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>need for independently powered equipment (e.g., compressors).</p> <ul style="list-style-type: none"> <li>• Diesel equipment standing idle for more than three minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were on- site and away from residences.</li> <li>• Signs shall be posted to alert workers that diesel equipment standing idle for more than five minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were on- site and away from residences.</li> <li>• Properly tune and maintain equipment for low emissions.</li> </ul> <p>Implementation of these BAAQMD-identified “feasible control measures” for construction</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		emissions would reduce the short-term construction-related air quality impact of the updated Plan to <b><i>less than significant</i></b> .			
<b>Impact 5-2: Community Risk and Hazard Impacts.</b> Future development in accordance with the updated Plan could expose sensitive receptors to levels of toxic air contaminants (TACs) or PM2.5 that cause an unacceptable cancer risk or hazard, which represents a <b><i>potentially significant impact</i></b> .	S	<p><b>Mitigation 5-2.</b> For future discretionary development intended for occupancy by sensitive receptors located within the following specified distances from the identified sources of TACs and PM2.5 within the Plan Area, the County shall implement one of the mitigation measure options listed below:</p> <ul style="list-style-type: none"> <li>• El Camino Real – 100 feet,</li> <li>• Caltrain and Dumbarton rail corridor – 100 feet,</li> <li>• Dry cleaning operations – 300 feet (see Figure 5.1), and</li> <li>• Other stationary sources — 100 feet (see Figure 5.1).</li> </ul> <p>(Site-specific modeling for future development projects proposed within these distances may provide a data basis upon which this buffer distance may be reconsidered and reduced.)</p> <p>(1) Change the updated Plan proposed land use map to avoid</p>	County	LS	Not applicable. The project is a hotel development. Hotel occupants are not considered sensitive receptors.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>the siting of new sensitive receptors (e.g., residential uses) within these setback areas.</p> <p>(This mitigation option may be considered by the County to be inconsistent with the basic objectives of the updated Plan to provide additional housing along these corridors in order to generate additional vitality and foot traffic, ridership for transit, and social and business activity.)</p> <p>(2) <u>Alternatively</u>, require future individual discretionary development projects within the Plan Area that would place air quality sensitive receptors within these specified distances from identified sources, to either:</p> <p>(a) For projects within the specified distances from identified sources, conduct a site-specific health risk assessment using air quality dispersion modeling methodologies and screening thresholds recommended by the BAAQMD to demonstrate that, despite a location within the screening setback distances,</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>modeled site-specific exposures would be less-than-significant.</p> <p><u>or</u></p> <p>(b) Mitigate anticipated community risks and hazards through implementation of the following mitigations:</p> <ul style="list-style-type: none"> <li>Where residential uses or other sensitive receptors are proposed to be located within the setback distances specified above or identified through site-specific health risk assessment using air quality dispersion modeling to indicate potentially significant exposure, air filtration units shall be installed and maintained. The air filtration systems shall be installed to achieve BAAQMD effectiveness performance standards in removing PM2.5 from indoor air. The system effectiveness requirement shall be determined during final design, when the exact level of exposure is known, based on proximity to these sources;</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<ul style="list-style-type: none"> <li>• Locate ventilation air intakes and operable windows away from these sources;</li> <li>• Where appropriate, install passive (drop-in) electrostatic filtering systems, especially those with low air velocities (i.e., 1 mph);</li> <li>• Consider tiered plantings of trees, such as redwood, deodar cedar, live oak and oleander, between sensitive uses and these sources;</li> <li>• Consider plan implementation phasing that delays occupancy of units with highest exposure so that source emissions regulations and vehicle fleet turnover that would result in lower emissions may take more effect and lower exposure levels (since emission rates will decrease in the future, projects developed later in the updated Plan buildout timeframe would have less exposure);</li> <li>• Avoid locating truck loading</li> </ul>			



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>zones near sensitive units;</p> <ul style="list-style-type: none"> <li>Require rerouting of nearby heavy-duty truck routes;</li> <li>Enforce illegal parking and/or idling restrictions on heavy-duty trucks in the vicinity; and</li> <li>Install indoor air quality monitoring units in buildings.</li> </ul> <p>With implementation of either one of these mitigation options, the potential TAO and PM2.5 exposure impacts of the updated Plan would be reduced to a less-than-significant level. Potential future preparation and implementation by the County of a Community Risk Reduction Plan (CRRP) to bring TAC and PM2.5 concentrations for the entire community down below BAAQMD thresholds of significance as an alternative to addressing associated community health risk on a project-by-project basis would also reduce this impact to <b>less than significant</b>.</p>			
<b>Impact 5-3: Odor Impacts of Mixed Use Development.</b>	S	<b>Mitigation 5-3.</b> Discretionary approvals within the Plan Area for food service (e.g., restaurants) or	County	LS	Not applicable. The project does not

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
Development in accordance with the updated Plan could result in food service uses (e.g., restaurants) or other odor-generating uses in close proximity to or in the same building as residential or other odor-sensitive uses. This possibility represents a <b>potentially significant impact</b> .		<p>other odor generating uses located in close proximity to or in the same building as residential or other odor sensitive uses shall be conditioned to implement a combination of the following measures to reduce odors and potential conflicts and complaints:</p> <ul style="list-style-type: none"> <li>for restaurant or cooking uses, use of such devices as integral grease filtration or grease removal systems, baffle filters, electrostatic precipitators, water cooling/cleaning units, disposable pleated or bag filters, activated carbon filters, oxidizing pellet beds, and catalytic conversion, as well as proper packaging and frequency of food waste disposal, and exhaust stack and vent location with adequate consideration of nearby receptors; and</li> <li>for new residential dwellings within 300 feet of existing paint spraying operations (e.g., auto body shops), cleaning operations (e.g., dry cleaners), or other uses with</li> </ul>			propose residential uses. Hotels are not considered an odor sensitive use.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>the potential to cause odors, identification and adequate disclosure of potential odor impacts in notices to prospective buyers or tenants.</p> <p>With implementation of this mitigation, the potential odor impacts of the updated Plan would be reduced to a <b><i>less-than-significant level</i></b>.</p>			
<b>BIOLOGICAL RESOURCES</b>					
<b>Impact 6-1: Migratory Wildlife Impacts.</b> Grading and construction activities associated with development in accordance with the updated Plan could temporarily reduce nesting opportunities for resident and migratory bird species that are protected by the Migratory Bird Treaty Act. This possibility	S	<b>Mitigation 6-1:</b> During the County's development review process for discretionary approvals for development within the Plan Area, the County shall require tree removal and trimming, as well as ground disturbing activities, to be scheduled to take place outside of the breeding season for migratory bird species (February 15 to August 31). If construction is unavoidable during this time, a qualified biologist shall conduct a survey for nesting birds no more than three days prior to the removal or trimming of any tree and prior to the start of ground disturbing activities. If active nests are not present, project activities	County	LS	Not applicable. The project site does not contain any natural habitat, including trees.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
represents a <b><i>potentially significant impact</i></b> .		can proceed as scheduled. If active nests of protected species are detected, a buffer shall be established around the nest based on consultation with CDFG and based on CDFG standards, which buffer shall remain in place until the County has determined, in consultation with a qualified biologist, that the buffer is no longer necessary to avoid disturbance to the nest. With implementation of this measure, potential impacts of the updated Plan on nesting birds would be reduced to a <b><i>less-than-significant level</i></b> .			
<b>CULTURAL AND HISTORIC RESOURCES</b>					
<b>Impact 8-1: Impacts on Archaeological Resources.</b> Fourteen previous cultural resource studies have surveyed approximately 10 percent of the Plan Area. The Plan Area contains three recorded archaeological	S	<b>Mitigation 8-1:</b> The County shall implement the following measures: (a) With the assistance of a professional archaeologist on the CHRIS list of consultants who meets the Secretary of the Interior's Professional Qualifications Standards, County staff shall identify and keep confidential the locations of the three recorded Native American habitation sites within the Plan Area, P-41-000086, P-41-000299, and P-41-000303.	County	LS	Applicable. Subsection (c) is applicable if an archeological resource is encountered during construction of the project. Subsections (a) and (b) are applicable only if the project is

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>resources, P-41-000086, P-41-000299, and P-41-000303, all prehistoric Native American habitation sites. Given the location of the Plan Area within valley lands approximately 1/2-mile from the historic San Francisco Bay shoreline near the locations of former intermittent and perennial watercourses, there is a moderate to high potential for the presence of additional unrecorded Native American resources within the Plan Area. There are no previously recorded historic- period archaeological resources within</p>		<p>(b) Before approval of any discretionary project that could affect any of the three recorded Native American habitation sites within the Plan Area, P-41-000086, P-41-000299, and P-41-000303, a professional archaeologist on the CHRIS list of consultants who meets the Secretary of the Interior's Professional Qualifications Standards shall assess the resources and provide project-specific recommendations.</p> <p>(c) If prehistoric or historic-period archaeological resources are encountered during future construction within the Plan Area, work shall be temporarily halted in the vicinity of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated, recorded and determined appropriate treatment of the resource, in consultation with the County. Project personnel shall not collect cultural resources. Cultural resources shall be recorded on DPR 523 historic resource recordation forms. Native</p>			<p>located within any of the three recorded Native American habitation sites, or if archaeological resources are encountered during construction.</p>

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
the Plan Area. Based on review of historical literature and maps, there is a moderate to high potential for the presence of unrecorded historic-period archaeological resources within the Plan Area. Development in accordance with the updated Plan could disrupt, alter or eliminate as-yet undiscovered prehistoric or historic-period archaeological sites, potentially including Native American remains. This possibility represents a <b>potentially significant impact</b> .		American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies. If it is determined that the proposed development could damage a unique archaeological resource, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. This measure would reduce the potential impact on archaeological resources to <b>less than significant</b> .			
<b>Impact 8-2: Impacts on Historic Resources.</b> There	S	<b>Mitigation 8-2.</b> For any individual discretionary project within the Plan Area that the County determines may involve a property	County	LS/SU	Applicable. The absence of potentially significant

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>are ten previously recorded historic properties within the Plan Area: eight recorded buildings which have been determined ineligible for the National Register of Historic Places but have not been evaluated for potential eligibility for the California Register of Historical Resources or for local listing; and two recorded structures, the Peninsula Commute Service (also known as the San Francisco &amp; San Jose Railway) and the Hetch Hetchy Bay Division Pipeline. There may also be additional unrecorded buildings,</p>		<p>that contains a potentially significant historic resource (i.e., a recorded historic resource or an unrecorded building or structure 45 years or older), the resource shall be evaluated by County Planning Department staff, and if warranted, shall be assessed by a qualified professional on the CHRIS list of consultants who meet the Secretary of the Interior's Professional Qualifications Standards to determine whether the property is a significant historical resource and whether or not the project may have a potentially significant adverse effect on the historical resource. If, based on the recommendation of the qualified professional, the County determines that the project may have a potentially significant effect, the County shall require the applicant to implement the following mitigation measures:</p> <p>(a) Adhere to one or both of the following "Secretary Standards":</p> <ul style="list-style-type: none"> <li>• Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing</li> </ul>			<p>historical resources on the project site cannot be confirmed at this time.</p>

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>structures or objects 45 years or older within the Plan Area that are of potential historical value.</p> <p>Future development on properties within the Plan area that contain a potentially significant historic resource (i.e., a recorded historic resource or an unrecorded building or structure 45 years or older) may cause the demolition, destruction or alteration of a significant historic resource such that the significance of the resource is “materially impaired.” This possibility represents a</p>		<p>Historic Buildings; or</p> <ul style="list-style-type: none"> <li>• Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer.</li> </ul> <p>The qualified professional shall make a recommendation to the County as to whether the project fully adheres to the Standards for Rehabilitation, and any specific modifications necessary to do so. The final determination as to a project’s adherence to the Standards for Rehabilitation shall be made by the County body with final decision-making authority over the project. Such a determination of individual project adherence to the Secretary Standards will constitute mitigation of the project historic resource impacts to a less than significant level (CEQA Guidelines section 15064.5).</p> <p>(b) If measure (a) is not feasible, the historic resource shall be moved to a new location compatible with the original character and use of the historical resource, and its historic features and compatibility in orientation, setting, and general environment</p>			



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b><i>potentially significant impact.</i></b>		<p>shall be retained, such that the resource retains its eligibility for listing on the California Register. If neither measure (a) nor measure (b) is feasible, the County shall, as applicable and to the extent feasible, implement the following measures in the following order:</p> <p>(c) Document the historic resource before any changes that would cause a loss of integrity and loss of continued eligibility. The documentation shall adhere to the Secretary of the Interior's Standards for Architectural and Engineering Documentation. The level of documentation shall be proportionate with the level of significance of the resource. The documentation shall be made available for inclusion in the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) Collections in the Library of Congress, the California Historical Resources Information System and the Bancroft Library, as well as local libraries and historical societies, such as the North Fair Oaks Community Library.</p> <p>(d) Retain and reuse the historic</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>resource to the maximum feasible extent and continue to apply the Secretary of the Interior's Standards for Rehabilitation to the maximum feasible extent in all alterations, additions and new construction.</p> <p>(e) Through careful methods of planned deconstruction to avoid damage and loss, salvage character-defining features and materials for educational and interpretive use on-site, or for reuse in new construction on the site in a way that commemorates their original use and significance.</p> <p>(f) Interpret the historical significance of the resource through a permanent exhibit or program in a publicly accessible location on the site or elsewhere within the Plan Area.</p> <p>Implementation of measures (b), (c), (d), (e) and/or (f) would reduce the potentially significant impact on historic resources. However, without knowing the characteristics of the potentially affected historic resource or the subject future individual development proposal, the County cannot determine with certainty that these measures</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		would reduce the potential impacts of the individual project on historic resources to a less-than-significant level. Consequently, this impact may remain significant and unavoidable.			
<b>Impact 8-3: Disturbance of Paleontological Resources.</b> Development in accordance with the updated Plan could potentially disrupt, alter or eliminate as-yet undiscovered paleontological resources. This possibility represents a <b><i>potentially significant impact.</i></b>	S	<b>Mitigation 8-3:</b> If paleontological resources are encountered during future grading or excavation in the Plan Area, work shall avoid altering the resource and its stratigraphic context until a qualified paleontologist has evaluated, recorded and determined appropriate treatment of the resource, in consultation with the County. Project personnel shall not collect cultural resources. Appropriate treatment may include collection and processing of “standard” samples by a qualified paleontologist to recover micro vertebrate fossils; preparation of significant fossils to a reasonable point of identification; and depositing significant fossils in a museum repository for permanent curation and storage, together with an itemized inventory of the specimens. This measure would reduce the potential impact on paleontological resources to a	County	LS	Applicable to all grading or excavation activity.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		less-than-significant level.			
<b>Impact 8-4: Cumulative Cultural Resources Impacts.</b> The loss of significant archaeological, historical and paleontological resources due to a development activity facilitated by the updated Plan would represent a cumulatively considerable contribution to a loss of cultural resources throughout San Mateo County and the surrounding region, and thus a <b>significant cumulative impact</b> .	S	<b>Mitigation 8-4:</b> Implementation of Mitigations 8-1 and 8-3 would reduce the impacts of the updated Plan, and thus the project contribution to significant cumulative impacts on archaeological resources and paleontological resources, to a less-than-significant level. However, it cannot be determined at this time, without consideration of a specific development proposal, whether it would be feasible under Mitigation 8-2 to mitigate to a less-than-significant level the impacts on historic resources of any given subsequent individual development project within the Plan Area that involves a potentially significant historic resource, and so the contribution of the updated Plan to cumulative impacts on cultural resources would remain cumulatively considerable and thus <b>significant and unavoidable</b> .	County	SU	Applicable. See Impact 8-2 above.
<b>HYDROLOGY AND WATER QUALITY</b>					
<b>Impact 11-1: Flooding impacts Related to Sea</b>	S	<b>Mitigation 11-1.</b> Future individual development projects on properties within the Plan Area	County	LS	Not applicable. The project site is not

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p><b>Level Rise.</b> A limited number of parcels located on Bay Road, Spring Street, Willow Street and Charter Street in the northwestern portion of the Plan Area could be subject to flooding due to predicted sea level rise associated with global climate change. With increased flooding potential in the future, development in accordance with the updated Plan could place people, structures and other improvements in these areas at an increased risk of injury or loss from flooding. This possibility represents a</p>		<p>subject to flooding as a result of predicted sea level rise shall be required to comply with specific flood damage avoidance requirements commonly required for development within 100-year flood hazard areas under the National Flood Insurance Program and Chapter 35.5, Flood Hazard Areas, of the San Mateo County Code of Ordinances, even if such projects do not lie within an Area of Special Flood Hazard as identified by FEMA. These requirements may include, but are not limited to, raising the elevation of habitable space above anticipated flood heights, creating 'freely communicating' structures that allow flood waters to pass through lower levels of buildings, and ensuring that site design does not result in a reduction of floodplain areas which could result in increasing flooding conditions downstream. Implementation of this measure would reduce flooding impacts related to predicted sea level rise associated with global climate change to a less-than-significant level.</p>			<p>located in a designated flood hazard area.</p>

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<i>potentially significant impact.</i>					
<b>NOISE AND VIBRATION</b>					
<b>Impact 13-1: Demolition and Construction Period Noise.</b> Demolition and construction activities associated with the updated Plan could temporarily increase noise levels at nearby residential and commercial sensitive receptors. Noise levels at 50 feet from the demolition or construction equipment source could reach approximately 105 dBA, resulting in intermittent interference with typical existing residential and business activities, and exceeding the	S	<b>Mitigation 13-1.</b> Reduce demolition- and construction-period noise impacts on nearby residences in the Plan Area by incorporating conditions in project demolition and construction contract agreements that stipulate the following conventional construction-period noise abatement measures: • Construction Plan. Prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with nearby noise-sensitive facilities so that construction activities can be scheduled to minimize noise disturbance. • Construction Scheduling. Ensure that noise-generating construction activity is limited to between the hours of 7:00 a.m. and 6:00 p.m. weekdays, 9:00 a.m. and 5:00 p.m. on Saturdays, and does not occur at any time on	County	LS	Applicable to all demolition and construction activity.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
County's noise ordinance limits. This possibility represents a <b><i>potentially significant impact</i></b> .		<p>Sundays, Thanksgiving or Christmas.</p> <ul style="list-style-type: none"> <li>• Construction Equipment Mufflers and Maintenance. Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.</li> <li>• Equipment Locations. Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project site.</li> <li>• Construction Traffic. Route all construction traffic to and from the construction sites via designated truck routes where possible. Prohibit construction-related heavy truck traffic in residential areas where feasible.</li> <li>• Quiet Equipment Selection. Use quiet construction equipment, particularly air compressors, wherever possible.</li> <li>• Temporary Barriers. Construct solid plywood fences around construction sites adjacent to residences, operational businesses, or noise-sensitive land uses.</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<ul style="list-style-type: none"> <li>• Temporary Noise Blankets. Temporary noise control blanket barriers should be erected, if necessary, along building facades adjoining construction sites. This mitigation would only be necessary if conflicts occurred which were not able to be resolved by scheduling. (Noise control blanket barriers can be rented and quickly erected.)</li> <li>• <i>Noise Disturbance Coordinator.</i> For larger construction projects, the County may choose to require project designation of a “Noise Disturbance Coordinator who would be responsible for responding to any local complaints about construction noise. The Disturbance Coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the Disturbance Coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. (The project sponsor should be responsible for</li> </ul>			



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>designating a Noise Disturbance Coordinator, posting the phone number, and providing construction schedule notices. The Noise Disturbance Coordinator would work directly with an assigned County staff member.)</p> <ul style="list-style-type: none"> <li>Implementation of these measures would reduce this intermittent, short-term, project construction-period noise impact to a <b><i>less-than-significant level</i></b>.</li> </ul>			
<p><b>Impact 13-2: Exposure to Temporary Construction Ground-Borne Vibration.</b> Demolition and construction activities associated with Plan Update-facilitated development activity could generate substantial temporary ground-borne vibration</p>	S	<p><b>Mitigation 13-2.</b> Reduce ground-borne vibration levels during individual, site-specific future project demolition and construction periods in the Plan Area by incorporating conditions in individual project demolition and construction contractor agreements that stipulate the following ground-borne vibration abatement measures:</p> <ul style="list-style-type: none"> <li>Ensure that vibration-generating activity is limited to between the hours of 7:00 a.m. and 6:00 p.m. weekdays, 9:00 a.m. and 5:00 p.m. on Saturdays, and does not occur at any time on Sundays, Thanksgiving or Christmas.</li> </ul>	County	LS	Applicable to all demolition and construction activity.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
(e.g., from pile driving) exceeding standard vibration thresholds, which could interfere with normal activities or cause a nuisance for or damage to adjacent properties. Temporary excessive ground-borne vibration would represent a <b>potentially significant impact</b> .		<ul style="list-style-type: none"> <li>• Notify occupants of land uses located within 200 feet of pile-driving activities of the project construction schedule in writing.</li> <li>• Investigate in consultation with County staff possible pre-drilling of pile holes as a means of minimizing the number of pile driving blows required to seat the pile.</li> <li>• Conduct a pre-construction site survey documenting the condition of any historic structure located within 200 feet of proposed pile driving activities.</li> <li>• Monitor pile driving vibration levels to ensure that vibration does not exceed appropriate thresholds for the potentially affected building (5mm/sec or 0.2 inches/sec ppv for structurally sound buildings). Implementation of these measures would reduce this potential intermittent and short-term Plan Update-related vibration impact to a less-than-significant level.</li> </ul>			
<b>Impact 13-3: Permanent Ground-Borne Vibration Impacts.</b> Development facilitated by the	S	<b>Mitigation 13-3:</b> Before the development of new habitable buildings in the Plan Area within 100 feet of the centerline of the Caltrain tracks or Dumbarton rail corridor,	County	LS	Not applicable. The project site is not located within 100 feet of the Caltrain tracks

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>updated Community Plan would not be expected to introduce any permanent new sources of significant groundborne vibration. However, the Plan Update would permit new multifamily and single-family residential development within 100 feet of the Caltrain tracks or the Dumbarton rail corridor. Groundborne vibration levels are typically less than the FTA criteria for frequent events (72 VdB) at a distance of approximately 100 feet or more from the centerline of the Caltrain tracks or the</p>		<p>completion of a detailed site-specific vibration study shall be required demonstrating that groundborne vibrations associated with rail operations either (1) would not exceed applicable FTA groundborne vibration impact assessment criteria (see Table 13.4), or (2) can be reduced to below the applicable FTA criteria thresholds through building design and construction measures (e.g., stiffened floors, modified foundations). Implementation of this measure would reduce this potential intermittent vibration impact to a <b><i>less-than-significant level</i></b>.</p>			<p>or Dumbarton rail corridor.</p>

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
Dumbarton rail corridor. Therefore, where new residential or other vibration sensitive uses are proposed within 100 feet or less of the Caltrain tracks or the Dumbarton rail corridor, a <b><i>potentially significant vibration impact</i></b> could occur.					
<b>Impact 13-4: Exposure to Noise Levels Exceeding Standards.</b> The occupants of new residential and other noise-sensitive development facilitated in the Plan Area by the Plan Update could be exposed to noise levels in excess of County noise standards and California	S	<b>Mitigation 13-4.</b> All proposed new multi-family residential or other noise-sensitive uses within 300 feet of the existing Caltrain line and proposed Dumbarton rail corridor, and within 120 feet of El Camino Real and other arterial roadways, shall submit for County approval a noise study, consistent with the requirements of the California Building Code, to identify noise reduction measures necessary to achieve compatibility with County noise standards and California Building Code noise compatibility standards. The noise study shall be approved by the	County	LS	Not applicable. The project is a hotel development. Hotels are not considered a noise-sensitive use per Policy 16.7 of the County General Plan.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
Building Code standards, which would represent a <b><i>potentially significant impact</i></b> .		<p>County's Planning and Building Department prior to issuance of a building permit. Identified noise reduction measures, in order of preference so that windows can be opened, may include:</p> <ul style="list-style-type: none"> <li>• Site and building design so as to minimize noise in shared residential outdoor activity areas by locating such areas behind the buildings, in courtyards, or orienting the terraces toward the interior of lots rather than streets;</li> <li>• Site and building design so as to minimize noise in the most intensively occupied and noise-sensitive interior spaces of units, such as bedrooms, by placing such interior spaces and their windows and other openings in locations with less noise exposure;</li> <li>• Design of windows, doors, and other sound transmission paths such as ventilation openings, walls, and roofs to achieve a high Sound Transmission Class (STC) rating and/or other noise-attenuating characteristics.</li> <li>• Installation of forced air mechanical ventilation systems in all units exposed to noise levels exceeding Title 24 standards to</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		allow residents the option of reducing noise by keeping the windows closed. Implementation of these measures to the satisfaction of the County's Planning and Building Department would reduce this impact to a less-than-significant level.			
<b>Impact 13-5: Cumulative Plus Project Noise Impacts.</b> Cumulative plus project traffic noise levels are expected to increase by 3 dBA, and traffic resulting from the updated Community Plan would contribute at least 1 decibel to the cumulative traffic noise level increase, along the following two street segments:  <ul style="list-style-type: none"> <li>• Bay Avenue between Woodside Road and</li> </ul>	S	<b>Mitigation 13-5.</b> Implementation of some combination of the following traffic noise reduction measures on Bay Avenue from Woodside Road to Fifth Avenue and on Middlefield Road from Fifth Avenue to Eighth Avenue would mitigate this impact:  <ul style="list-style-type: none"> <li>• <i>Pave streets with reduced-noise pavement types such as rubberized or open grade asphalt.</i> Reduced-noise pavement types would reduce noise levels by 2 to 3 dBA depending on the existing pavement type, traffic speed, traffic volumes, and other factors. Case studies have shown that the replacement of standard dense grade asphalt with open grade or rubberized asphalt can reduce traffic noise levels along residential streets</li> </ul>	County	SU	Not applicable. The project site is not located along Bay Avenue between Woodside Road and Fifth Avenue nor along Middlefield Road between Fifth Avenue and Eighth Avenue.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>Fifth Avenue, and</p> <ul style="list-style-type: none"> <li>• Middlefield Road between Fifth Avenue and Eighth Avenue.</li> </ul> <p>Noise-sensitive receptors along these street segments would be exposed to a substantial cumulative increase in traffic noise levels. The updated Community Plan would result in a cumulatively considerable contribution to this cumulative noise impact, representing a <b>significant cumulative impact</b>.</p>		<p>by 2 to 3 dBA. A possible noise reduction of 2 dBA would be expected using conservative engineering assumptions. Project-generated traffic noise increases could be reduced to a less-than-significant level along Bay Avenue from Woodside Road to Fifth Avenue and Middlefield Road from Fifth Avenue to Eighth Avenue. In order to provide permanent mitigation, all future repaving would needed to consist of "quieter" pavements.</p> <ul style="list-style-type: none"> <li>• <i>Construct new or larger noise barriers.</i> New or larger noise barriers could reduce noise levels by 5 dBA L<sub>dn</sub>. The final design of such barriers, including an assessment of their feasibility and cost-effectiveness, should be completed during final design.</li> <li>• <i>Install traffic calming measures to slow traffic along Bay Avenue and Middlefield Road.</i> Traffic calming measures could provide a qualitative (i.e., perceived if not measurable)</li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>improvement by smoothing out the rise and fall in noise levels caused by speeding vehicles.</p> <ul style="list-style-type: none"> <li>• <i>Provide sound insulation treatments to affected buildings.</i> Sound-rated windows and doors, mechanical ventilation systems, noise insulation, and other noise-attenuating building materials could reduce noise levels in interior spaces.</li> </ul> <p>Measures such as repaving with reduced-noise pavement types, the replacement or construction of noise barriers, traffic calming, and sound insulation could reduce the project contribution to cumulative traffic noise at affected sensitive receptors on Bay Avenue from Woodside Road to Fifth Avenue and on Middlefield Road from Fifth Avenue to Eighth Avenue to a less-than-significant level.</p> <p>However, each of these measures involves other non-acoustical considerations. For example, other engineering considerations may require continued use of dense grade asphalt.</p>			



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		Installation of noise barriers may be inconsistent with desired community character and local aesthetic goals. Installation of noise barriers and sound insulation treatments on private property would require agreements with each affected property owner. These measures therefore may not be feasible to reduce the project contribution to cumulative traffic noise at every affected sensitive receptor, or such measures may not be desired by the County or by affected individual property owners. Therefore, the contribution of the updated Community Plan to cumulative noise impacts is considered to represent an unavoidable, cumulatively considerable, effect—i.e., a <b>significant and unavoidable Impact</b> .			
<b>TRANSPORTATION AND TRAFFIC</b>					
<b>Impact 16-1. El Camino/Fifth Avenue Intersection Impacts.</b> Under Existing Plus	S	<b>Mitigation 16-1.</b> Restripe the southbound approach to one dedicated left turn lane, one dedicated right turn lane, and one shared left turn/ right turn lane. This mitigation would	County	LS	Not applicable. The project would not have an impact on this intersection.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
Project conditions, intersection operations would deteriorate from acceptable LOS C (existing) to unacceptable LOS D during the AM peak hour, which would represent a <b>potentially significant impact</b> under Caltrans criteria.		improve the intersection to LOS C during the AM peak hour and therefore would reduce the project impact to a <b>less-than-significant level</b> .			
<b>Impact 16-2: Middlefield Road/Woodside Road Intersection Impacts.</b> Under Existing Plus Project conditions, intersection operations would deteriorate from acceptable LOS D (existing) to unacceptable LOS F during the PM peak hour, which would represent a <b>potentially significant impact</b>	S	<b>Mitigation 16-2.</b> Modify traffic signal operations to include a westbound right turn overlap phase and a northbound right turn overlap phase. This mitigation would improve the intersection to LOS E during the PM peak hour and therefore would reduce the project impact to a <b>less-than-significant level</b> .	County	LS	Not applicable. The project would not have an impact on this intersection.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
under C/CAG criteria.					
<b>Impact 16-3: Middlefield Road/Avenue Intersection Impacts.</b> Under Existing Plus Project conditions, intersection operations would deteriorate from acceptable LOS C (existing) to unacceptable LOS F during the AM peak hour, and from unacceptable LOS E (existing) to unacceptable LOS F during the PM peak hour, which would represent a <b>potentially significant impact</b> under San Mateo County criteria.	S	<b>Mitigation 16-3.</b> In the northbound and southbound directions, prohibit on-street parking within the vicinity of the intersection, shift the through/right turn lane and stripe a dedicated left turn lane; modify traffic signal operations from split phase to concurrent northbound and southbound travel with protected left turn phasing; prohibit parking in the eastbound direction within the vicinity of the intersection and stripe a dedicated eastbound right turn lane. This mitigation would improve the intersection to LOS C during the AM peak hour, and therefore would reduce the project impact to a <b><i>less-than-significant level</i></b> .	County	LS	Not applicable. The project would not have an impact on this intersection.
<b>Impact 16-4: Middlefield Road/Semicircular Road Intersection Impacts.</b> Under	S	<b>Mitigation 16-4.</b> In the eastbound direction, prohibit on-street parking within the vicinity of the intersection, and stripe a dedicated left turn lane, resulting	County	LS	Not applicable. The project would not have an impact on this

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>Existing Plus Project conditions, intersection operations would deteriorate from unacceptable LOS E (existing) to unacceptable LOS F during the AM peak hour, and from unacceptable LOS D (existing) to unacceptable LOS F during the PM peak hour, which would represent a <b>potentially significant impact</b> under San Mateo County criteria.</p>		<p>in one left turn lane, one through lane, and one shared through/right turn lane; modify traffic signal operations to the following phases:</p> <ul style="list-style-type: none"> <li>• Phase 1: NE Semicircular Rd through movement and WB Middlefield Rd through and unprotected left (as exists currently)</li> <li>• Phase 2: EB Middlefield Rd through phase and WB Middlefield Rd through and unprotected left turn</li> <li>• Phase 3: EB Middlefield Rd through and protected left turn</li> <li>• Phase 4: Pedestrian only phase for Semicircular Rd crossing (as exists currently)</li> <li>• Phase 5: NB and SB phases with unprotected left turns (as exists currently)</li> </ul> <p>This mitigation would improve the intersection to LOS D during the AM and PM peak hours, and therefore would reduce the project impact to a <b>less-than-significant level</b>.</p>			<p>intersection.</p>

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b>Impact 16-5: Fifth Avenue/Bay Road Intersection Impacts.</b> Under Existing Plus Project conditions, intersection operations would deteriorate from acceptable LOS D (existing) to unacceptable LOS F during the AM peak hour, and from acceptable LOS C (existing) to unacceptable LOS F during the PM peak hour, which would represent a <b>potentially significant impact</b> under City of Redwood City criteria.	S	<b>Mitigation 16-5.</b> The Redwood City Traffic Impact Mitigation Fee Program includes the installation of a traffic signal at this intersection as a planned capital improvement. As a condition of approval for future individual discretionary development projects within the Plan Area, require project fair-share contribution toward the installation of this traffic signal. This mitigation would improve the intersection to LOS C during the AM peak hour, and therefore would reduce the project impact to a <b>less-than-significant level</b> .	County	LS	Not applicable. The project would not have an impact on this intersection.
<b>Impact 16-6: Bay Road/Woodside Road Intersection Impacts.</b> Under Existing Plus Project conditions, intersection	S	<b>Mitigation 16-6.</b> The MTC Transportation 2035 Plan and the Redwood City Traffic Impact Mitigation Fee Program identify the widening of Woodside Road to six travel lanes between El Camino Real and US 101 as a	County	LS	Not applicable. The project would not have an impact on this intersection.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
operations would deteriorate from acceptable LOS C (existing) to unacceptable LOS D during the AM peak hour, and from acceptable LOS C (existing) to unacceptable LOS E during the PM peak hour, which would represent a <b>potentially significant impact</b> under Caltrans criteria.		planned capital improvement. As a condition of approval for future individual discretionary development projects within the Plan Area, require project fairshare contribution toward the addition of a southbound through lane and optimization of cycle length. This mitigation would improve the intersection to LOS C during the AM and PM peak hours, and therefore would reduce the project impact to a <b>less-than-significant level</b> .			
<b>Impact 16-7: Transit Facilities Impacts.</b> The Existing Plus Project scenario would generate additional transit trips, which would place substantial additional demands on the existing and planned SamTrans, Caltrain and High Speed Rail Authority transit	S	<b>Mitigation 16-7.</b> The County shall coordinate with SamTrans, Caltrain, the High Speed Rail Authority, and other appropriate transit authorities to ensure that existing and future transit services within the vicinity of North Fair Oaks are capable of accommodating potential Plan Update-related increases in transit demand. Given the anticipated long-term Plan Area buildout period and the uncertainty of the existing and proposed transit facilities, equipment, and services	County	SU	Not applicable. The project would not have a potentially significant impact on transit facilities.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
network in the Plan Area. This would represent a <b><i>potentially significant impact</i></b> .		beyond the County's jurisdiction, it cannot be determined at this time whether service improvements would be implemented concurrently with increase demand such that acceptable service levels would be maintained. Therefore, the impacts of the Community Plan on transit service are currently deemed to be <b><i>significant and unavoidable</i></b> .			
<b>Impact 16-8: Safety Impacts at At-Grade Railroad Crossings.</b> Development facilitated by the Plan Update may result in substantial additional automobile, bicycle, and/or pedestrian traffic at existing at-grade railroad crossings in the Plan Area vicinity and potentially contribute to safety issues at these railroad crossings. This would represent <b>a</b>	S	<b>Mitigation 16-8.</b> As a condition of approval for future individual discretionary development projects within the Plan Area that would generate substantial additional multi-modal trip (i.e., motor vehicles or pedestrians) crossing volume at at-grade railroad crossings in the project vicinity, require project implementation of the following: • Transportation Impact Studies (TIS) for At-Grade Railroad Crossings. The TIS, otherwise required to be prepared for proposed developments under the Plan Update, in accordance with standard City policies and practices, will evaluate potential impacts to at-grade railroad crossings resulting from project-	County	LS	Not applicable. The project is not located in the vicinity of a rail crossing and would not generate substantial additional multi-modal trip crossing volume at at-grade railroad crossings.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b><i>potentially significant impact.</i></b>		<p>related traffic. The TIS shall examine whether the proposed development would generate substantial multi-modal trips crossing at-grade railroad crossings which could substantially increase hazards between incompatible uses (e.g., motor vehicles and trains, pedestrians and trains). Such analysis may include a Diagnostic Review for each railroad crossing.</p> <ul style="list-style-type: none"> <li>• If required, the Diagnostic Review must be completed with all affected properties and stakeholders, in coordination with the California Public Utilities Commission (CPUC). It will include: roadway and rail descriptions; collision history; traffic volumes for all modes; train volumes; vehicular speeds; train speeds; and existing rail and traffic controls. Based on the Diagnostic Review and the number of projected trips, the TIS will evaluate if the proposed development increases hazards at the crossing. For example, vehicle traffic generated by a proposed development may cause vehicle queuing at intersections resulting</li> </ul>			



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>in traffic spilling back onto at-grade railroad crossings.</p> <ul style="list-style-type: none"> <li>• Where the TIS identifies substantially hazardous crossing conditions caused by the proposed development, mitigations relative to the development's contribution to the crossing, as necessary, shall be applied through project redesign and/or incorporation of improvements to reduce potential adverse impacts. Proposed improvements must be coordinated with CPUC and affected railroads and all necessary permits/approvals obtained, including a GO 88-B Request (Authorization to Alter Highway Rail Crossings). These improvements may include: <ul style="list-style-type: none"> <li>– installation of additional warning signage;</li> <li>– improvements to warning devices at existing rail crossings;</li> <li>– installation or improvement to automobiles and/or pedestrian control gates;</li> <li>– installation of concrete panels to provide a smooth crossing surface;</li> <li>– reduction in the flangeway gap to improve pedestrian and bicyclist</li> </ul> </li> </ul>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		<p>safety;</p> <ul style="list-style-type: none"> <li>– installation of median separation to prevent vehicles from driving around railroad crossings;</li> <li>– improvements to traffic signaling at intersections adjacent to crossings (e.g., signal preemption);</li> <li>– prohibition of parking within 100 feet of the crossings to improve the visibility of warning devices and approaching trains;</li> <li>– where sound walls, landscaping, buildings, etc., would be installed near crossings, maintain the visibility of warning devices and approaching trains;</li> <li>– elimination of driveways near crossings;</li> <li>– installation of vandal-resistant fencing or walls to limit the access of pedestrians onto the railroad right-of-way; and/or</li> <li>– installation of grade separations at crossings.</li> </ul> <p>This mitigation measure shall be applied by the County on individual development projects (case-by-case), as appropriate. The incorporation of improvements identified in this mitigation measure could reduce the</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		development's impact to the at-grade railroad crossing to a less-than-significant level. However, to the extent that installation of safety mechanisms is not feasible (physically, financially or otherwise), impacts would remain significant and unavoidable. More detailed individual project-specific analysis of this impact and effectiveness of the mitigation measure at specific at-grade railroad crossings is not feasible in this programmatic EIR: therefore, it is conservatively concluded that this mitigation measure may not mitigate the identified significant impact to a less-than-significant level, and the impact remains potentially significant and unavoidable. Therefore, this EIR conservatively identifies the Plan Update impact on railroad crossing safety as significant and unavoidable.			
<b>Impact 16-9: Cumulative Plus Project Impact on El Camino Real/Fifth Avenue Intersection.</b> Under Cumulative	S	<b>Mitigation 16-9.</b> Implement Mitigation 16-1: restripe the southbound approach to one dedicated left turn lane, one dedicated right turn lane, and one shared left turn/right turn lane. Under the Cumulative Plus Project	County	SU	Not applicable. See Impact 16-1 above.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p>Plus Project conditions, intersection operations would deteriorate from an unacceptable LOS D (No Project, 37.0 seconds average delay) to unacceptable LOS D (50.1 seconds average delay) during the AM peak hour, and from acceptable LOS C (No Project) to unacceptable LOS D delay during the PM peak hour, which would represent a <b><i>potentially significant impact</i></b> under Caltrans criteria.</p>		<p>condition during the AM peak hour, this mitigation would result in a projected LOS C; however, during the PM peak hour, the intersection would still operate at LOS D.</p> <p>Additional capacity would be needed at this intersection to mitigate the Cumulative Plus Project impact. Constructing additional lanes would require obtaining additional right-of-way and relocation of utilities, and would contradict the purpose of the Plan Update to create a pedestrian, bicycle, and transit-friendly environment. Achievement of an "acceptable" vehicular LOS standard at this intersection would not encourage development of the pedestrian friendly, mixed-use, transit-oriented environment. Typically, construction of additional intersection lanes can worsen conditions for pedestrian and bicycle travel by increasing exposure to conflicts with vehicles and deteriorating the nonmotorized environment. Also, since this intersection is controlled by Caltrans, this improvement</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		would exceed the County's authority to implement. This impact is therefore considered <b><i>significant and unavoidable</i></b> .			
<b>Impact 16-10: Cumulative Plus Project Impact on Middlefield Road/Woodside Road Intersection.</b> Under Cumulative Plus Project conditions, intersection operations would deteriorate from an acceptable LOS E (No Project) to unacceptable LOS F during both the AM and PM peak hour, which would represent a <b><i>potentially significant impact</i></b> under C/CAG criteria.	S	<b>Mitigation 16-10.</b> Implement Mitigation 16-2: modify traffic signal operations to include a westbound right turn overlap phase and a northbound right turn overlap phase. This mitigation would improve the intersection to LOS E during the AM and PM peak hours and would therefore reduce the project impact to a <b><i>less-than-significant level</i></b> .	County	LS	Not applicable. See Impact 16-2 above.
<b>Impact 16-11: Cumulative Plus Project Impact on Middlefield Road/Fifth</b>	S	<b>Mitigation 16-11.</b> Implement Mitigation 16-3: in the northbound and southbound directions, prohibit on-street parking within the vicinity of the intersection, shift	County	LS	Not applicable. See Impact 16-3 above.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b>Avenue Intersection.</b> Under Cumulative Plus Project conditions, intersection operations would deteriorate from an acceptable LOS C (No Project) to unacceptable LOS E during the AM peak hour, and from unacceptable LOS F (No Project, 83.9 seconds average delay) to unacceptable LOS F (254.5 seconds average delay) during the PM peak hour, which would represent a <b><i>potentially significant impact</i></b> under San Mateo County criteria.		the through/right turn lane and stripe a dedicated left turn lane; modify traffic signal operations from split phase to concurrent northbound and southbound travel with protected left turn phasing; prohibit parking in the eastbound direction within the vicinity of the intersection; and stripe a dedicated eastbound right turn lane.  This mitigation would improve the intersection to LOS C during the AM peak hour and LOS E during the PM peak hour. While the PM peak hour would still not meet the LOS standard, the mitigation would decrease average delay to a level that is lower than under Cumulative No Project conditions. Therefore, the project's contribution to this cumulative impact would be reduced to a <b><i>less-than-significant level</i></b> .			
<b>Impact 16-12: Cumulative Plus Project Impact on Middlefield Road/Semicircular</b>	S	<b>Mitigation 16-12.</b> Implement Mitigation 16-4: in the eastbound direction, prohibit on-street parking within the vicinity of the intersection, and stripe a	County	LS	Not applicable. See Impact 16-4 above.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<p><b>Road Intersection.</b> Under Cumulative Plus Project conditions, intersection operations would deteriorate from an acceptable LOS D (No Project) to unacceptable LOS E and LOS F during the AM and PM peak hour, respectively, which would represent a <b>potentially significant impact</b> under San Mateo County criteria.</p>		<p>dedicated left turn lane, resulting in one left turn lane, one through lane, and one shared through/right turn lane; modify traffic signal operations to the following phases:</p> <ul style="list-style-type: none"> <li>• Phase 1: NE Semicircular Rd through movement and WB Middlefield Rd through and unprotected left (as exists currently)</li> <li>• Phase 2: EB Middlefield Rd through phase and WB Middlefield Rd through and unprotected left turn</li> <li>• Phase 3: EB Middlefield Rd through and protected left turn</li> <li>• Phase 4: Pedestrian only phase for Semicircular crossing (as exists currently)</li> <li>• Phase 5: NB and SB phases with unprotected left turns (as exists currently)</li> </ul> <p>This intersection is projected to operate at LOS D during the AM and PM peak hours. With the addition of project generated trips, the intersection is projected to</p>			

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		operate at LOS E during the AM peak hour and LOS F during the PM peak hour under the Cumulative plus Project scenario. The mitigation measure would mitigate the project's impact at this intersection. The proposed mitigation would improve the intersection to LOS D during the AM and PM peak hours and therefore would reduce the project impact to a <i>less-than-significant level</i> .			
<b>Impact 16-13: Cumulative Plus Project Impact on Middlefield Road/Marsh Road Intersection.</b> Under Cumulative Plus Project conditions, intersection operations would deteriorate from an acceptable LOS C (No Project) to unacceptable LOS E during the PM peak hour, which would represent a <i>potentially</i>	S	<b>Mitigation 16-13.</b> As identified in the Menlo Gateway Project Draft EIR, construction of a southbound left turn lane from Middlefield Road onto Marsh Road, or similar traffic mitigations, could improve intersection operation to acceptable LOS D during the PM peak hour. However, this mitigation measure may require obtaining additional right-of-way from adjacent developed properties, and is therefore potentially infeasible. Additionally, since the intersection is in the jurisdiction of the Town of Atherton, this improvement would exceed the County's authority to implement. It is recommended that	County	SU	Not applicable. The project would not have an impact on this intersection.



Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
<b>significant impact</b> under Town of Atherton criteria.		the County coordinate with the Town of Atherton to consider implementation of the mitigation. Until such time as this mitigation is considered feasible, the impact is considered <b>significant and unavoidable</b> .			
<b>Impact 16-14: Cumulative Plus Project Impact on Bay Road/Woodside Road Intersection.</b> Under Cumulative Plus Project conditions, intersection operations would deteriorate from an unacceptable LOS C (No Project) to unacceptable LOS E and LOS F during the AM and PM peak hour, respectively, which would represent a <b>potentially significant impact</b> under Caltrans criteria.	S	<b>Mitigation 16-14.</b> Construction of an additional northbound through lane, an additional southbound through lane, and a dedicated westbound right turn lane, plus addition of an overlap signal phase to coincide with the existing southbound left turn phase, would improve operation at this intersection to acceptable LOS C during the AM and PM peak hours. However, this mitigation measure may require obtaining additional right-of-way from adjacent developed properties, and is therefore potentially infeasible. Constructing additional lanes would also require relocation of utilities, and would contradict the purpose of the Plan Update to create a pedestrian, bicycle, and transit-friendly environment. Typically, such intersection improvements can worsen conditions for pedestrian and	County	SU	Not applicable. The project would not have an impact on this intersection.

Impacts	Potential Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Potential Significance With Mitigation	Applicability to 2567 El Camino Real Hotel Project
		bicycle travel by increasing exposure to conflicts with vehicles and deteriorating the non-motorized environment. Additionally, this intersection is controlled by Caltrans, this improvement would exceed the County's authority to implement. This impact is therefore considered <b>significant and unavoidable</b> .			
<b>Impact 16-15: Cumulative Plus Project Safety Impacts at At-Grade Railroad Crossings.</b> Development facilitated under Cumulative Plus Project conditions may result in additional automobile, bicycle, and/or pedestrian traffic at the existing at-grade railroad crossings and potentially contribute to safety issues along the railroad crossings.	S	<b>Mitigation 16-15.</b> Implement Mitigation 16-8. As discussed under that mitigation, it is conservatively concluded that the mitigation would not mitigate the identified significant impact to a less-than-significant level, and the impact would remain <b>significant and unavoidable</b> .	County	LS	Not applicable. The project would not have an impact on this intersection.

<b>Impacts</b>	<b>Potential Significance Without Mitigation</b>	<b>Mitigation Measures</b>	<b>Mitigation Responsibility</b>	<b>Potential Significance With Mitigation</b>	<b>Applicability to 2567 El Camino Real Hotel Project</b>
This would represent a potentially significant cumulative impact.					

## APPENDIX B: SUMMARY OF CHANGES TO COUNTY INITIAL STUDY CHECKLIST

The following table is excerpted from the April 10, 2019 Planning Commission Meeting staff report on information item PLN 2019-00123, California Environmental Quality Act Guidelines Update. The table summarizes the changes to the County's Initial Study Checklist resulting from the State's updates to the CEQA Guidelines checklist. Checklist questions previously adopted that discuss environmental impacts/resources specific to San Mateo County have been retained (e.g., *For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?*) The table is meant to provide a general guide to how the environmental checklist questions contained in this consistency analysis differ from the checklist questions used at the time the NFO Plan EIR was prepared.

Initial Study Checklist Modifications Summary		
Section	Category	Modifications
All	Document-wide	<ul style="list-style-type: none"> <li>- Where identified, replaced <i>significant</i> with <i>substantial</i></li> <li>- Where identified, section headers and numbering updated.</li> <li>- Minor grammatical modifications (e.g., <i>State to state</i>)</li> </ul>
1	Aesthetics	<ul style="list-style-type: none"> <li>- Clarification of non-urbanized areas and impacts on existing visual character and quality of public views, as opposed to private views.</li> <li>- Explanation of public views as experienced from a publicly accessible vantage point.</li> <li>- In urbanized areas, analysis of regulations governing scenic quality is added.</li> </ul>
2	Agricultural and Forest Resources	No modifications.
3	Air Quality	<ul style="list-style-type: none"> <li>- Removal of duplicative analysis regarding violations of air quality standards while retaining compliance with applicable air quality plan and project generation of non-attainment criteria pollutant.</li> <li>- Analysis of <i>other emissions</i> resulting in odors added.</li> </ul>
4	Biological Resources	<ul style="list-style-type: none"> <li>- Removal of qualifier that federally protected wetlands are defined by Section 404 of the Clean Water Act but retaining the provision to protect federally protected wetlands as well as adding state protected wetlands.</li> </ul>

5	Cultural Resources	No substantial modifications (relocation of geologic resource question to Section 7).
6	Energy [New Section]	- Addition of two questions regarding potentially significant impacts of inefficient energy resource consumption during project construction or operation, and conflict or obstruction of a state or local renewable energy or energy efficiency plan
7	Geology and Soils	- Modification of language from exposure of <i>people or structures</i> to the project's <i>direct or indirect</i> cause of potential adverse seismic, liquefaction, landslides, erosion, or cliff/bluff instability effects.  Additional question regarding <i>directly or indirectly destroying a unique paleontological resource or site or unique geologic feature</i> .
8	Climate Change	No modifications.
9	Hazards and Hazardous Materials	- Additional language to include impacts of <i>excessive noise</i> on people residing or working in the project area when located within an adopted airport land use plan area or within 2 miles of a public airport.  <i>Removal</i> of references to wildland fires and inclusion of that analysis in Section 20 [new section].
10	Hydrology and Water Quality	- Additional language regarding the project effects on surface or ground water quality, ground water supplies, sustainable groundwater basin management, and alteration of drainage patterns through additional impervious surface. - Addition of two questions regarding <i>flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation and conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan</i> .
11	Land Use and Planning	Removal of repetitive language
12	Mineral Resources	No modifications.
13	Noise	- Expanding on potential noise levels in excess of established standards, to include <i>temporary or permanent increase in ambient noise levels in the vicinity of the project</i> .  Expanding the public airport/public use airport to also include the <i>vicinity of a private airstrip</i> .
14	Population and Housing	- Clarification of population growth in an area to a <i>substantial unplanned population growth in an area</i> .  Expanding analysis of <i>low or moderate income housing</i> to the displacement of <i>substantial numbers of existing people or</i>

		<i>housing.</i>
15	Public Services	No modifications.
16	Recreation	No modifications.
17	Transportation	<ul style="list-style-type: none"> <li>- Removal of repetitive language and clarifying analysis to focus on comprehensive circulation system program, ordinance, or policy.</li> <li>- Removal of analysis of a congestion management program and, instead, consistency with CEQA Section 15064.3(b) Criteria for Analyzing Transportation Impacts which bases a project's transportation impacts on Vehicle Miles Traveled, instead of Level of Service, and proximity to an existing major transit stop/high quality transit corridor.</li> </ul>
18	Tribal Cultural Resources	No modifications.
19	Utilities and Service Systems	<ul style="list-style-type: none"> <li>- Expanding analysis of new water or wastewater treatment to include relocation and expansion of water, wastewater, storm water, drainage, electric power, natural gas, or telecommunications facilities.</li> <li>- Expanding water supply availability analysis to include <i>reasonably foreseeable future development during normal, dry and multiple dry years.</i></li> <li>- Removal of landfill capacity serving the project to the project's <i>generation of solid waste in excess of State or location standards, or in excess of local infrastructure capacity, or impair attainment of solid waste reduction goals.</i></li> </ul>
20	Wildfire [New Section]	- New section added to address project's proximity to state responsibility areas or lands classified as very high fire hazard severity zones.
21	Mandatory Findings of Significance	No modifications.
N/A	Responsible Agencies List	- Added State Department of Fish and Wildlife to agency list.
N/A	Mitigation Measures and Determination	No modifications.

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